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September 22, 2015

VIA EMAIL

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Re: Southern California Edison's Comments to the Draft Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project

To Whom It May Concern:

This letter and accompanying attachments contain the comments of Southern California Edison Company ("SCE") on the Draft Environmental Impact Report/Draft Environmental Impact Statement ("DEIR/DEIS") for the West of Devers Upgrade Project ("WOD Upgrade Project" or "Proposed Project"). SCE appreciates the time and effort that went into developing the DEIR/DEIS and submits these comments in order to ensure that the analysis in the Final EIR/EIS is both complete and accurate.

I. INTRODUCTION

In the DEIR/DEIS, the California Public Utilities Commission ("CPUC") concludes that the Phased Build Alternative (an alternative developed by the authors of the document, the CPUC and the Bureau of Land Management ("BLM")), is the environmentally superior alternative.[1] For inexplicable reasons, the authors of the document have proposed a Phased Build Alternative which deviates significantly from the very purpose of the Proposed Project, contravenes the policy of the State of California to efficiently provide for the delivery of renewable energy resources to customer load, may be technically infeasible to construct, and creates higher net environmental impacts than the Proposed Project due to:

- visual impacts,
- physical footprint, and
- a requirement to enter the project corridor for extensive construction activities not once, but twice, to construct a project alternative that is inferior to the Proposed Project.

As demonstrated below, the DEIR/DEIS conclusion that the Phased Build Alternative is environmentally superior is fatally flawed.

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[1] The BLM will select its Environmentally Superior Route in the Final EIR/EIS.

First, the Phased Build Alternative does not meet most of the project objectives and therefore is not a viable alternative under the California Environmental Quality Act ("CEQA"). The Phased Build Alternative does not meet the project objectives articulated by the authors in the DEIR/DEIS, nor does it meet SCE's project objectives (which should be adopted as the project objectives in the Final Environmental Impact Report ("FEIR/FEIS")). Simply put, the Phased Build Alternative fails to meet the basic purpose and need for the Proposed Project.

Second, the Phased Build Alternative is not feasible as defined by CEQA. For an alternative to be considered feasible, CEQA requires that it is capable of being developed in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. That is not the case here. The Phased Build Alternative is technologically flawed, raising questions of whether it can be safely constructed in the right-of-way ("ROW"). In order to install the Phased Build Alternative's 795 Aluminum Conductor Composite Reinforced ("ACCR") conductor, planned wire sites would need to be modified and new wire sites would be required. These wire sites may need to be located within areas not previously analyzed. These areas could potentially be environmentally sensitive or located outside the existing ROW. The DEIR/DEIS does not recognize this important aspect of the Phased Build Alternative's features, thereby omitting these meaningful impacts— impacts that would not be caused by the Proposed Project. Given these undesirable characteristics of the Phased Build Alternative, SCE considers it to be technologically infeasible under CEQA.

The Phased Build Alternative is also legally and economically constrained because the construction methods necessary to construct the Phased Build Alternative will require extended double-, triple- or quadruple-line outages of the existing transmission system that is being modified. The California Independent System Operator ("CAISO") is unlikely to approve such extensive outages which could place the system at risk of not meeting reliability standards. Even if it did, such outages would lead to substantial generator curtailment, causing significant economic loss to generators currently connecting to the West of Devers lines. Additionally, the Phased Build Alternative would be legally infeasible if the Morongo Band of Mission Indians were to determine that by failing to obtain a CPCN for the Proposed Project, SCE has not met its contractual and legal obligations contained in the Proposed Transaction.[2] The Phased Build Alternative is also infeasible from a regulatory perspective, as it only satisfies a portion of the need for the project. The Phased Build Alternative provides for approximately one third less, or about 1000 MW less deliverability, compared to the Proposed Project. If the Phased Build Alternative were constructed, it is reasonably foreseeable that additional transmission capacity would be needed in the near-term, and there is currently not enough time to license and construct such a project, as transmission projects take many years to successfully license and construct. This risk is accentuated by the passage of SB 350 and increasing the RPS to 50% by 2030, which will likely have the effect of spurring additional renewable generation, the transmission of which is a key objective of the Proposed Project.

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[2] As discussed in SCE's Application and testimony, SCE and Morongo Transmission entered into a Development and Coordination Agreement that provides Morongo Transmission the option to lease transfer capability right in a portion of the Proposed Project in exchange for the Morongo Tribe's consent to the ROW agreement that permits the Proposed Project to be built across the tribal trust lands of the Morongo Tribe. In sum, this transaction is referred to as the Proposed Transaction.

Third, the Phased Build Alternative would result in greater environmental impacts than the Proposed Project by requiring SCE to remobilize construction efforts multiple times over subsequent phases to achieve what could have been accomplished in a single coordinated construction effort, resulting in extended disturbance periods, reduced efficiencies, and greater impacts. These increased environmental effects factor into the infeasibility of the Phased Build Alternative under CEQA.

Fourth, without fully analyzing or understanding the scope of the Phased Build Alternative, the DEIR/DEIS asserts that the Phased Build Alternative would have a reduced construction timeframe and would cost less than the Proposed Project. This is wrong. This unsubstantiated conclusion in the DEIR/DEIS completely misses and understates the necessary project scope elements, design and engineering work, conductor procurement and testing efforts, and construction requirements needed to actually build the Phased Build Alternative. The DEIR/DEIS then errs by making an inapt comparison of the cost of the Phased Build Alternative to SCE's Proposed Project, as it does not consider the reduced capacity of the first phase of the Phased Build Alternative, as well as the cost of the next phase of the Phased Build Alternative.

Further, the introduction of an entirely new alternative based on the "Project Alternative Assessment A Power Flow Analysis" prepared by the CPUC's transmission consultant, ZGlobal,[3] and then the selection of that alternative as the environmentally superior alternative, is inconsistent with how Certificate of Public Convenience and Necessity ("CPCN") applications are evaluated by the CPUC. The CEQA track of the proceeding evaluates the environmental impacts of the proposed project and a reasonable range of alternatives. SCE recognizes that it is appropriate for the DEIR/DEIS to consider alternatives that were not included in SCE's Proponent's Environmental Assessment ("PEA") if the CPUC and BLM determine that is necessary under CEQA and the National Environmental Policy Act ("NEPA"). However, here, the CPUC and BLM developed an entirely new alternative based on an untested and flawed analysis by ZGlobal. This is inappropriate because the CEQA track of the proceeding is not the place where the need determination should be made. Instead, the need determination will be established in the case-in-chief, where SCE will have the opportunity to file its own testimony, rebut counter testimony, and cross-examine witnesses. It puts the cart before the horse to rely on ZGlobal's analysis in the DEIR/DEIS before it has been subjected to critique in the case-in-chief. As explained in the attached comments, ZGlobal's analysis is fatally flawed—it does not adequately evaluate system needs and cannot be relied upon for transmission planning purposes or to determine the scope of the Proposed Project. It is misleading to the public and decision-makers to present the Phased Build Alternative as a viable environmental option when it fails to meet the project objectives and may be infeasible to implement. At a minimum, the DEIR/DEIS needs to clarify that the system planning assessment underpinning the Phased Build Alternative is preliminary and untested and may change following the case-in-chief testimony.

The DEIR/DEIS requires SCE to obtain a variance from local jurisdictions if SCE's construction will conflict with local noise ordinances. The CPUC has made clear that regulated public utilities are not required to obtain local agency discretionary approvals related to the construction of major transmission lines, such as the Proposed Project, including local noise

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[3] DEIR/DEIS, Appendix 5, "Alternatives Screening Report."

variances. This well-established authority is grounded in the California Constitution, the Public Utilities Code, and General Order 131-D. Further, CEQA does not require a local agency noise variance to address this impact because all feasible mitigation measures are already being applied to reduce the noise impacts. A variance may also be infeasible under CEQA. Despite SCE's protests, in recent transmission licensing projects, the CPUC has ordered SCE to obtain a variance from local jurisdictions. In some of those instances, local agencies have declined to grant variance requests in a reasonable period of time, nothwithstanding SCE's best efforts. For these reasons, the requirement to obtain a variance from local noise ordinances should be stricken from the DEIR/DEIS or, at a minimum, modified based on the language proposed by SCE.

SCE also has serious concerns about the visual analysis in the DEIR/DEIS. The mitigation for construction impacts, for both SCE's Proposed Project and the Phased Build Alternative, creates a process whereby, *after* the EIR/EIS is approved, staff will *re-analyze* every spur road, retaining wall, and ground disturbance area within Segments 2, 3, 4 and 6, resulting in an unknown number of project design changes even though the information is already available to include such analysis in the EIR/EIS. These design changes may raise new environmental or engineering constraints, which could lead to further delays and uncertainty. This mitigation strategy is fundamentally flawed and not allowed under CEQA. For operational impacts, the DEIR/DEIS identifies four discrete locations with significant visual impacts. For the large majority of the Proposed Project's 48 corridor miles, impacts will either be beneficial or less than significant. Nevertheless, the DEIR/DEIS imposes onerous mitigation measures across the entirety of the project. Simply put, this is not consistent with CEQA. Mitigation can only be required to reduce significant impacts and if this is applied, it must be limited in scope by having an "essential nexus" to the nature of the impact and be "roughly proportional" to the scale of the impact. SCE proposes removal of applicable mitigation measures in order to make the DEIR/DEIS compliant with CEQA.

Lastly, SCE asserts that the renewable solar generation projects utilizing the West of Devers lines are more appropriately analyzed in the DEIR/DEIS as "cumulative impacts" rather than "connected actions." As explained in Section VIII, below, NEPA sets forth a specific test for determining whether or not projects should be considered "connected actions" for purposes of environmental analysis. Here, the renewable solar generation projects should be considered "cumulative impacts" not "connected actions," as per the NEPA standard.

In addition to the general comments described herein, SCE has also prepared a detailed narrative demonstrating that the Phased Build Alternative does not meet the need for the WOD Upgrade Project, as well as a specific comment table specifically addressing various sections of the DEIR/DEIS. These documents are attached as Attachment A and B, respectively.

II. THE PHASED BUILD ALTERNATIVE DOES NOT MEET MOST OF THE PROJECT OBJECTIVES AND SHOULD BE REJECTED

A. CEQA Requires Alternatives To Meet Most Of The Project Objectives

CEQA requires an EIR to focus on alternatives that can eliminate or reduce significant environmental impacts while attaining most of the project objectives. CEQA Guidelines § 15126.6(a)-(b).

Case law recognizes using the applicant's project objectives to determine the reasonable range of alternatives. In *Sierra Club v. County of Napa*, 121 Cal. App. 4th 1490 (2004), the court upheld an agency's reliance on the project applicant's objectives both to narrow the scope of alternatives, and, ultimately, to reject some alternatives as infeasible. In *Sierra Club*, Beringer winery submitted an application to the County of Napa to develop a 1.4 million square foot winery. In proposing the project, Beringer identified several objectives related to expanding and consolidating its wine-making and warehousing facilities. *Id.* at 1496.

The County's EIR concluded that Beringer's project would have significant and unavoidable impacts on wetlands. The EIR analyzed six alternatives to the project, but eliminated three of the alternatives as infeasible for "not meeting Beringer's objectives." *Id.* The County then proceeded to approve Beringer's Proposed Project. Sierra Club challenged the approval, asserting that the project objectives were drawn too narrowly. The Court of Appeal upheld the County's approval, finding that "the project is the only feasible means of accomplishing Beringer's objective." *Id.* at 1508.

SCE is aware of case law supporting a lead agency's discretion to change an applicant's project objectives to ensure a full range of alternatives are analyzed in the EIR in order to reduce environmental impacts. *See, e.g., Save Round Valley Alliance v. County of Inyo*, 157 Cal. App. 4th 1437 (2007) (applicant's narrow project objectives could not be used to avoid consideration of alternative site with fewer environmental impacts). However, SCE is not familiar with any case where a lead agency eliminated an applicant's project objectives that were aimed at reducing environmental impacts and meeting regulatory standards, as is the case here.[4]

Specifically, for West of Devers, SCE identified six basic objectives:[5]

1. Allow SCE to meet its obligation to integrate and fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid.

2. Consistent with prudent transmission planning, maximize the use of existing transmission line rights-of-way to the extent practicable.

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[4] It is important to note that the Phased Build Alternative fails to reduce environmental impacts while also failing to meet the project need, as described in more detail below.

[5] Proponent's Environmental Assessment, Section 1.3.

3. Meet project need while minimizing environmental impacts.

4. Facilitate progress toward achieving California's RPS goals in a timely and cost-effective manner by SCE and other California utilities.

5. Comply with applicable Reliability Standards and Regional Business Practice developed by NERC, WECC, and the CAISO; and design and construct the project in conformance with SCE's approved engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects.

6. Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable.

In turn, the DEIR/DEIS identifies the following three "Basic Project Objectives"[6]:

- Basic Project Objective 1: To upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 megawatts (MW).

- Basic Project Objective 2: To support achievement of State and federal renewable energy goals.

- Basic Project Objective 3: To maximize the availability of remaining space in the corridor to the extent practicable, so future use of the corridor for additional transmission line upgrades is not precluded.

Accordingly, the DEIR/DEIS *eliminates* SCE's project objectives #3 (minimizing environmental impact), #5 (comply with reliability standards) and #6 (construct facilities in a timely and cost-effective manner, while minimizing service interruptions) and *narrows* objective #1 by focusing only on the first phase of solar generation projects instead of the reasonably foreseeable projects identified by SCE and the CAISO. The DEIR/DEIS does not explain the basis for eliminating objectives #3, 5 and 6, which are aimed at reducing environmental impacts and utility customer costs while maintaining reliability.

As described next, the Phased Build Alternative does not ensure that SCE's objectives #1, 3, 5 and 6 can be met. Furthermore, even if SCE's objectives are ignored, the Phased Build Alternative does not meet two out of the three "Basic Project Objectives" identified in the DEIR/DEIS.

B. The Analysis Of The Phased Build Alternative Is Flawed

As described in more detail in Attachment A, SCE believes that the technical analysis that led to the conclusion that the Phased Build Alternative met the Basic Project Objectives is severely

[6] DEIR/DEIS, pp. A-11-A-14.

flawed. There are numerous errors in the underlying assumptions, as well as the alleged capabilities of the Phased Build Alternative.

SCE believes that the Phased Build Alternative would likely require additional transmission elements such as a Remedial Action Scheme ("RAS") and 600 MVAr of shunt capacitance, consisting of several smaller capacitor banks installed at multiple locations. These additional transmission elements were not analyzed for environmental or cost impact in the DEIR/DEIS, leading to a smaller scope and impact than the Phased Build Alternative would actually have.

Further, the ZGlobal studies used the CAISO's reliability base cases without making the necessary changes to the generation dispatch assumptions to determine delivery network upgrade is flawed and inconsistent with the CAISO's deliverability study methodology. The generation dispatch levels set by the CAISO in the Reliability base cases are intended to eliminate any network upgrades driven by the addition of new generation and only identify upgrades needed to serve the load forecast. For example, the CAISO's 2024 Reliability Base Case that was used to validate the DEIR/DEIS Phase Build Alternative limits Photovoltaic and Solar Thermal to 36% and Wind resources to 0% of its maximum capability. This low generation dispatch level is inadequate to identify delivery network upgrades needed to provide FCDS. Using the reliability base cases without accounting for the deliverability requirements of the generation that has executed agreements and that are in queue presents an inaccurate forecast of the actual system needs in the West of Devers corridor.

Additionally, as described in more detail in Attachment A, the ZGlobal studies inaccurately stated that the amount of generation that needs the WOD Upgrade Project for deliverability was 1,881 MW. This amount ignores 985 MW that are already interconnected and have Full Capacity Deliverability Status as a result of the Interim West of Devers Project, which will not provide any deliverability benefits once the WOD Upgrade Project is constructed.

C. The Phased Build Alternative Does Not Meet Most Of SCE's Project Objectives

As stated above, the Phased Build Alternative would not allow SCE to meet objectives #1, 3, 5 and 6. With respect to objective #1, as described in Attachment A to this letter, the Phased Build Alternative would limit the amount of new generation that could be interconnected and fully delivered. Only one of the Power Flow Cases analyzed by the DEIR/DEIS found the Phased Build Alternative to be feasible.[7] However, this Case limited the amount of generation that would be interconnected in the Blythe and Dessert Center areas to only 1,387 MW. This is far less than the 1,859 MW that already has executed interconnection requests requiring the WOD Upgrade Project for Full Capacity Deliverability Status ("FCDS") and completely ignores the remaining generation in queue. Currently there are 6,072 MW of generation in the CAISO queue that would all require the WOD Upgrade Project to support FCDS. While not all of that generation may ultimately develop, given that the total designated Renewable Resource Portfolio for Riverside East and the Imperial area (to meet the 33% renewable goal by 2024) is 4,767 MW, SCE believes that the Phased Build Alternative significantly limits the ability of renewable projects in those areas to be developed and have FCDS. In other words, for purposes of CEQA, it is reasonably foreseeable that some of the 6,072 MW of generation and in the CAISO queue will be developed, and it is *not*

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[7] DEIR/DEIS, Appendix 5, Attachment 2, ZGlobal Case 3, pg. 10.

reasonable to assume that none of this generation will be developed. This risk is accentuated by the passage of SB 350 and increasing the RPS to 50% by 2030, which will likely have the effect of spurring additional renewable generation.

With respect to objective #3, the Phased Build Alternative does not meet the Project need while minimizing environmental impact. As described in Section IV.B below, the Phased Build Alternative would lead to greater environmental impacts as future phases would be needed in the near term future.

With respect to objective #5, SCE believes that the Phased Build Alternative would require additional transmission upgrades not identified in the DEIR/DEIS that would need to be installed in order to alleviate reliability concerns.

Further, the Phased Build Alternative also does not meet objective #6. As described in Section III.B below, construction of the Phased Build Alternative would require extensive double-line outages, and potentially some triple- and quadruple-line outages, which may violate reliability criteria. The construction of additional phases would involve significant curtailment of generation that is already interconnected and delivering power.

Given the CEQA mandate that the Project Alternatives must meet and attain most of the project objectives, SCE cannot understand how the DEIR/DEIS could conclude that the Phased Build Alternative would meet the project objectives, either as stated by SCE or even in the reduced form as set forth in the DEIR/DEIS, as discussed next.

D. The Phased Build Alternative Does Not Meet Two Of The Three "Basic Objectives" Identified In The DEIR/DEIS

First, the Phased Build Alternative does not meet the DEIR/DEIS's Basic Objective 1 to increase system deliverability by at least 2,200 MW. In the ZGlobal Study, only one case (Case 3) supported the 795 ACCR conductor as a feasible alternative conductor, and that case only adds a small fraction of the transmission capability needed to meet the renewable project deliverability needs of the Proposed Project. As further described in Attachment A, a detailed review of Case 3 indicates that it only assumed 1,387 MW of generation resources at Red Bluff and Colorado River Substations. Today, there is already 1,050 MW of generation in service at Red Bluff and Colorado River Substations.[8] Therefore, based on Case 3, there would only be 337 MW of additional new resources that could be developed at both Colorado River and Red Bluff Substations, significantly less than the 1,929 MW[9] with executed generator interconnection agreements at this time and significantly less than the Basic Objective 1 minimum deliverability requirement. Moreover, Case 3's assumption of only 337 MW of new generation at Colorado River and Red Bluff Substations significantly downplays the importance of both the Colorado River and Red Bluff Substations for

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[8] The WOD upgrade has been identified by CAISO and SCE as a required Delivery Network Upgrade for generation projects located Colorado River and Red Bluff Substations. The Colorado River and Red Bluff Substations are designed to interconnect renewable developments in the Blythe and Desert Center areas. The flow from Colorado River and Red Bluff Substations ultimately flow through the WOD corridor.

[9] The 1,929 MW consist four projects (Q294, 365, 576, and 643AE), totaling 1,359MW, require the WOD upgrades for FCDS and two projects (Q17 and 219) totaling 570MW that would increase the flow on the WOD corridor.

interconnecting new renewable resources. It is reasonably foreseeable, indeed, even highly likely, that there will be more than 337 MW of new generation connecting at Colorado River and Red Bluff Substations. Given the reasonable foreseeability of such generation, it is improper under CEQA and NEPA to exclude this generation in the development of an alternative to the project.

The Phased Build Alternative[10] was assumed to provide 3,000 MW of deliverability. This assumption was not supported by any study performed by ZGlobal. To determine the actual MW of deliverability provided by the Phase Build Alternative, a deliverability study is needed consistent with the CAISO's deliverability study methodology. Since ZGlobal's Case 6 determined that the use of the 795 ACCR conductor would limit the flow through the West of Devers corridor to 1,900 MW due to system instability and excessive reactive power losses, SCE believes that the use of 795 ACCR conductor could introduce a new bottleneck that would limit the MW of deliverability. This would ultimately lead to a project that does not maximize the use of this critical transmission corridor.

These flaws highlight the error in developing an entirely new alternative based on a third-party analysis before SCE is given a chance to review and critique the analysis and cross-examine its preparers in the case-in-chief. ZGlobal's analysis is fatally flawed and does not adequately evaluate system needs and cannot be relied upon for transmission planning purposes or to determine the scope of the Proposed Project. At a minimum, the DEIR/DEIS needs to clarify that the system planning assessment underpinning the Phased Build Alternative is preliminary and untested and may change following the case-in-chief testimony. SCE believes that upon such scrutiny, the Phased Build Alternative will be shown to be far inferior in its ability to deliver incremental renewable energy.

Second, the Phased Build Alternative does not meet Basic Project Objective 2: to support achievement of State and federal renewable energy goals because the Phased Build Alternative would significantly limit the corridor transfer capability. SCE's review of the ZGlobal studies found that the Phased Build Alternative would limit the corridor transfer capability to approximately 1,900 MW.[11] As President Picker recently stated, "long-standing state policies incorporated as the Garamendi Principles call for expanding transmission within existing corridors."[12] Here, the Phased Build Alternative conflicts with that policy, as it limits the corridor capacity. As a result of limiting the corridor capability, the Phased Build Alternative would purposely introduce a barrier to the achievement of State and federal renewable energy goals. Given that West of Devers is a critical corridor for renewable developments in the Riverside East and Imperial Valley areas, the Phased Build Alternative would become a barrier for future renewable generation development in these areas to achieve deliverability. The total designated Renewable Resource Portfolio for Riverside East and Imperial zones to meet 33% by 2024 is 4,767MW as identified in the Revised 2015-2016 Renewable Portfolios Transmittal Letter.[13] The Phase Build Alternative would become a barrier to facilitate SCE's and other California utilities' requirement of achieving and maintaining California's 33% Renewable Resource Portfolio. This

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10 DEIR/DEIS Appendix 5, page Ap. 5-48.

11 ZGlobal Case 6 Study, Appendix 5, Attachment 2, pg. 12.

12 Concurrence of Commissioner Picker, D.15-05-004.

13 http://www.caiso.com/planning/Pages/TransmissionPlanning/2015-2016TransmissionPlanningProcess.aspx.

limitation of the Phased Build Alternative and its inability to meet Basic Project Objective 2 is magnified by the passage of SB 350, which increases the RPS to 50% by 2030.

III. THE PHASED BUILD ALTERNATIVE IS NOT FEASIBLE UNDER CEQA AND SHOULD BE REJECTED

CEQA defines "feasible" as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors.[14] Based on this definition, the Phased Build alternative is not feasible under CEQA because it cannot be accomplished in a successful manner within a reasonable period of time, taking into account:

- Technology constraints with the 795 ACCR conductor (as opposed to the 1590 ACSR conductor proposed by SCE). The unique wire stringing limitations of the 795 ACCR conductor would require SCE to expand the sizes of currently planned wire stringing sites and to add new sites. These sites may need to be located within environmentally sensitive areas not previously analyzed, or outside of the ROW, potentially resulting in the need for purchase or condemnation of property.

- Legal and economic constraints that limit the feasibility of assuming multiple outages required for the Phased Build Alternative. Based on SCE's experience, it is not likely that the CAISO would approve extended double-, triple- or quadruple-line outages on the West of Devers lines for the Phased Build Alternative. However, even if CAISO did approve such outages, it would lead to substantial generator curtailment, causing significant economic loss to generators currently connecting to the West of Devers lines.

- Regulatory constraints associated with the Phased Build Alternative's assumption that subsequent corridor upgrades can be completed "just in time" to meet increased demand. The time required to obtain new approvals from the CPUC and BLM may make it infeasible to construct upgrades to the Phased Build Alternative in time to meet system deliverability requests, creating a major potential risk to reliability. This risk is accentuated by the passage of SB 350 and increasing the RPS to 50% by 2030, which will likely have the effect of spurring additional renewable generation.

- Environmental constraints caused by the increased environmental impacts from the Phased Build Alternative, which will require SCE to remobilize construction efforts multiple times over subsequent phases to achieve what could have been accomplished in a single, coordinated construction effort contemplated by the Proposed Project, resulting in extended disturbance periods, reduced efficiencies and greater impacts.

The following subsections and Section IV describe each of these constraints in more detail and additional information is included in our broader comments. In short, even if some constraints can be minimized or avoided, the combination of feasibility constraints results in a conclusion that

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[14] Public Resources Code § 21061.1; CEQA Guidelines § 15364.

the Phased Build Alternative cannot be successfully completed in a reasonable period of time. For these reasons, the Phased Build Alternative is not a feasible option under CEQA and should be rejected.

A. Construction of The Phased Build Alternative May Be Technically Infeasible

The DEIR/DEIS did not take into account critical construction factors that render the Phased Build Alternative significantly more difficult, and potentially infeasible, to construct. Because these construction constraints are potentially insurmountable, SCE cannot say with certainty that the Phased Build Alternative can be safely constructed in the West of Devers corridor. SCE, therefore, asserts that the Phased Build Alternative is not feasible due to construction constraints, as described in more detail below.

The Phased Build Alternative specifies the use of 795 ACCR conductor as opposed to the 1590 ACSR ("Aluminum Conductor Steel Reinforced)" conductor proposed by SCE for the Proposed Project. According to 3M, the manufacturer of 795 ACCR conductor,[15] there are specific maximum allowable bending angles that cannot be exceeded when pulling ACCR conductor.[16] In contrast, the bending constraints for the 1590 ACSR conductor proposed by SCE, are significantly less restrictive.[17] The practical effect of this difference is that SCE's Proposed Project allows constructing wire sites (the large footprint temporary sites needed to station conductor reels and pulling equipment) at a much greater angle from the path of the transmission line being constructed. These greater angles are not possible when using the less flexible 795 ACCR conductor proposed in the Phased Build Alternative. This technical difference has major environmental consequences that are completely ignored in the DEIR/DEIS.

In order to safely construct the Phased Build Alternative in the West of Devers corridor, SCE would need to establish new wire sites and/or expand proposed wire sites to accommodate wire stringing of 795 ACCR conductor. The corridor traverses rugged terrain, and several residential communities have been developed adjacent to the corridor, limiting prospective real estate available for stringing setup areas. There are very few locations where SCE could site additional pulling and tensioning locations to support the installation requirements of the 795 ACCR conductor without conducting extensive grading or locating wire sites outside the existing ROW.

SCE was well aware of the ROW constraints when it planned the Proposed Project. The wire sites were carefully chosen so as to minimize earth moving, disturbance to residents, disturbance to jurisdictional waterways, critical habitats and condemnation of residential parcels. Preliminary examination of the Phased Build Alternative indicates that SCE would be required to redesign the wire stringing plan to support stringing of 795 ACCR conductor to assure pulling

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15 Manufacturer 3M is referenced in Appendix 5 to the DEIR/DEIS as the manufacturer of the 795 ACCR conductor.

16 3M website at http://multimedia.3m.com/mws/media/585820O/3m-accr-installation-maintenance-guidelines.pdf.

17 *IEEE Guide to the Installation of Overhead Transmission Line Conductors*, IEEE Std. 524 -2003, The Institute of Electrical and Electronics Engineers, Inc., March 12, 2004.

angles are maintained within manufacturer recommendations. Revisions to the wire stringing plan would include modifications to existing and new wire sites. These wire sites could be located in environmentally sensitive areas and/or require additional rights outside of the current ROW that could require condemnation. Without completing a new wire stringing plan that fully evaluates the physical topography of the corridor, the location of the new and existing towers, and the wire stringing angle limitations of the conductor, SCE cannot establish the feasibility of installing 795 ACCR conductor as an alternative to 1590 ACSR conductor. Even if it is feasible to relocate wire sites within areas suitable to limit wire stringing angle to within the manufacturer's specification, the environmental effects of such relocations need to be acknowledged. The DEIR/DEIS not only fails to assess the feasibility of construction with the different conductor type, it also fails to analyze or acknowledge the significant environmental impact thereof.

B. Legal and Economic Constraints Limit The Feasibility Of Multiple Outages Required By The Phased Build Alternative

The Phased Build Alternative would require multiple outages of the currently existing West of Devers 220 kV transmission lines, over a significant period of time. The current West of Devers corridor contains four 220 kV circuits. In order to safely upgrade or make changes to that corridor, some of these existing lines must be de-energized. De-energizing circuits is commonly referred to as taking an outage. Because the four circuits in the West of Devers corridor are currently operating at full capacity, SCE designed the construction plan for the Proposed Project specifically to limit the amount and duration of required outages consistent with SCE's Basic Project Objective #6. More importantly, the Proposed Project construction plan limits both the number of double-line outages (de-energization of two circuits at one time) and the duration of such outages. SCE could safely construct the Proposed Project while limiting any required double-line outages to less than 24 hours in duration. In contrast, in order to safely construct the Phased Build Alternative, SCE would need to take multiple double-, and possibly triple- or quadruple-line, outages of up to six months in duration.[18] This means that for up to six months at a time, multiple times during the four-plus-year construction schedule, two or more of the four circuits in the West of Devers corridor would be out of service.

SCE does not control when outages are allowed, as the scheduling of outages is solely within the jurisdiction of the CAISO. As SCE explained in response to the Energy Division's data request questions ALT-17A and ALT-17B, however, SCE suspects that the CAISO is not likely going to approve extended double-, triple- or quadruple-line outages on the existing West of Devers lines due to the negative system impacts such extended and significant outages would cause. However, even if CAISO did approve such outages, it would lead to significant generator curtailment, causing significant economic loss to those generators currently connecting to the West of Devers line and would not meet SCE's Basic Project Objective #6. If the Phased Build

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[18] The Phased Build Alternative requires, in part, stringing conductor on existing towers, whereas the Proposed Project requires stringing conductor on new towers. With minor exceptions, the Proposed Project design placed the new towers in such a location that the construction could proceed without having to de-energize more than one of the four existing 220 kV circuits for long periods of time. Because the Phased Build Alternative requires stringing conductor on currently existing towers, that alternative will require additional outages. Furthermore, the bending angle constraints of the Phased Build Alternative limit the placement of wire sites, such that more outages will be required in order to maintain clearance for safe construction.

Alternative were constructed, the curtailment impact of the line outages would be even further magnified for future phases of construction on the West of Devers lines. In that scenario, when subsequent upgrades are required, the corridor would be further loaded, leading to even more curtailment when subsequent construction double-, triple- or quadruple-line outages would be required. These costs limit the economic feasibility of the Phased Build Alternative.

C. The Phased Build Alternative Is Infeasible From a Regulatory Perspective

The time required to obtain new approvals from the CPUC and BLM may make it infeasible to construct upgrades to West of Devers in time to meet system deliverability requests, creating an inability to meet the interconnection requirements for renewable projects which may be required to meet RPS goals. The Phased Build Alternative is premised on a dubious assumption that new phases can be constructed "just in time" as new demand materializes. The DEIR/DEIS simply states that "future phases" under the Phased Build Alternative will be constructed "as generation projects become certain and capacity is clearly required."[19]

This gloss belies the complexity involved with building new transmission infrastructure in California – a process driven by multi-year planning cycles at the CAISO and CPUC, an extended environmental review and approval process, and a construction schedule often extended due to environmental factors such as nesting birds. The DEIR/DEIS fails to analyze the feasibility of achieving the upgrades in a reasonable period of time, particularly if needs develop faster than the DEIR/DEIS assumes.

The DEIR/DEIS does not address *which* agency will determine that "capacity is clearly required" (i.e., whether the CAISO who already found the need to exist, or the CPUC will also determine system need?), *in what proceeding* this determination will be made (i.e., as part of the CAISO's Transmission Planning Process, or a new CPUC proceeding focused on transmission planning and forecasting?), or whether this determination *will be made early enough* to ensure that SCE has time to prepare an application (which will require extensive environmental studies and engineering design), complete the CEQA/NEPA review, obtain all necessary approvals and complete construction in the challenging corridor before the new demand is online.

CPUC staff has acknowledged that it can take four to nine years to prepare an application, permit and construct a new transmission line.[20] Using the West of Devers Project as an example, SCE filed its CPCN Application in October 2013 and under the current pace, a decision is not likely until 2016, which is well over 2 years since the application was filed. Taking into account engineering, environmental studies and time to develop the PEA, it will have been 4 years prior to even getting a decision on the project, let alone the approximately 48-months minimum it is anticipated to take to build the project. Even assuming upgrades are not needed until 2024 as indicated in the DEIR/DEIS ("it may be 10 years [i.e., by 2024] before additional upgrades are

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19 DEIR/DEIS, p. C-25.

20 CPUC, "Processes for Planning and Permitting Electric Transmission Projects in California," (Oct. 2011), available at http://www.cpuc.ca.gov/NR/rdonlyres/6D4D8AA9-CF49-4194-A4C6-DF394317EA6B/0/CPUCSidesFresnoAssmblyComTransmissionOct242011.pdf, Slide 7.

needed"),[21] SCE would have to begin the application and PEA *years in advance, before 2020*, given the following estimated timelines:

- Approximately 6 to 12 months to update environmental studies for the PEA, including for biological and cultural resources;
- Approximately 9 to 12 months to prepare the PEA, engineering design and application;
- Approximately 18 to 30 months to obtain approvals from the CPUC and, if needed, BLM, including the environmental review and public involvement process, which makes timing difficult to predict because areas of controversy can substantially extend the process; and
- Approximately 48 months or more to complete construction, resulting in a total time period of approximately **7 to 9 years**.

Based on this timing, the Phased Build Alternative would require SCE to re-start the application process to upgrade West of Devers to meet needs in 2024 well before the end of 2022, which is the earliest this alternative project could be operational. In other words, the alternative creates a "do loop" where SCE must re-start the permitting process for the next phase, before the first phase is even energized. Even if the CPUC and BLM could support such a rapid re-start, let alone allow SCE to conduct its environmental studies and engineering on a future not yet completed base line, it is far from clear that SCE could obtain other agency approvals in a timely manner (e.g., endangered species take coverage) or satisfy other obligations. And if needs materialize before 2024, the likelihood of completing the upgrades in time becomes even less tenable.

Taken as a whole, it is simply not feasible under the current regulatory framework to assume the West of Devers Upgrade Project can be re-permitted to accommodate subsequent upgrades needed by 2024 or earlier.

IV. THE PHASED BUILD ALTERNATIVE DOES NOT REDUCE ENVIRONMENTAL IMPACTS COMPARED TO THE PROPOSED PROJECT

A. By "Chopping Up" Or "Segmenting" The Project, The DEIR/DEIS Ignores The Environmental Impacts Of The Whole Of The Action, Which CEQA And NEPA Prohibit

CEQA requires an analysis of the "whole of an action, which has the potential for physical impact on the environment." CEQA Guidelines § 15378(a). In other words, CEQA prohibits a lead agency from "chopping up" a single project into smaller individual subprojects to avoid responsibility for considering the environmental impact of the project as a whole. *Orinda Ass'n v. Board of* Supervisors, 182 Cal. App. 3d 1145, 1171 (1986); *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora*, 155 Cal. App. 4th 1214, 1223 (2007) (CEQA "cannot

[21] DEIR/DEIS, p. C-25.

be avoided by chopping up Proposed Projects into bite-sized pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial."). This is often referred to as a prohibition against "piecemealing" a larger project.

In the seminal case of *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal. 3d 376 (1988), the California Supreme Court set aside an EIR for failing to analyze the impacts of a reasonably foreseeable multi-phase project. The case involved a plan by the University of California to move its school of pharmacy to a new building, of which only about one-third was initially available. *Id.* at 393. The EIR acknowledged that the school would eventually occupy the remainder of the building, but the EIR only discussed the environmental effects relating to the initial move. *Id.* at 396. The court concluded that the EIR should have analyzed both phases. *Id.* at 399. In so holding, the court announced the following test: "[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." *Id.* at 396.

NEPA has a similar prohibition against "segmenting" a project to avoid full environmental review. *See, W. Radio Servs. Co. v. Glickman*, 123 F.3d 1189, 1194 (9th Cir. 1997) ("NEPA prevents an agency from illegally segmenting projects in order to avoid consideration of an entire action's effects on the environment").

The DEIR/DEIS does exactly what CEQA and NEPA prohibit by "chopping up" or "segmenting" the Proposed Project to focus solely on an initial phase instead of the whole of the action. The DEIR/DEIS does this by creating an artificially narrow "Basic Project Objective 1" designed to "increase system deliverability by at least 2,200 MW," which the DEIR/DEIS acknowledges covers only "the ***initial*** group of 5 solar power generation projects that was planned."[22]

However, as explained in Section II, above, Basic Project Objective 1 improperly ignores subsequent upgrades that are reasonably foreseeable to occur, and, indeed, are very likely to occur in the near term. The reasonable foreseeability of future generation is made even more likely when viewed through the lens of recent policy developments that will encourage renewable generation in California. On January 5, 2015, Governor Brown announced a goal to increase California's Renewables Portfolio Standard to 50% by 2030, and on April 29, 2015, Governor Brown issued Executive Order B-30-15, establishing statewide greenhouse gas reduction targets of 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050. The 50% RPS was recently codified into law with the passage of SB 350. Further, the California Air Resources Board has relied heavily on increasing renewable generation as a key goal for achieving greenhouse gas reductions. In addition, on September 26, 2014, the DEIR/DEIS for the Desert Renewable Energy Conservation Plan ("DRECP") was released, advancing plans to facilitate development of renewable resources within the DRECP area. Furthermore, the Commission itself in conjunction with the California Energy Commission have recently begun the process to establish a Renewable Energy Transmission

[22] DEIR/DEIS, p. A-11.

Initiative ("RETI") 2.0 initiative that describes the *inevitable* need for more transmission infrastructure to meet these State policy goals.

The DEIR/DEIS' approach to Basic Project Objective 1 is analogous to the EIR that was overturned in *Laurel Heights*, where the lead agency inappropriately focused on only the initial phase of a multi-phase project. Instead, the DEIR/DEIS should evaluate the deliverability need identified by the Proposed Project, which constitutes the whole of the action.

The Phased Build Alternative is a false solution because it only purports to satisfy the narrow system deliverability needs identified in Basic Project Objective 1, while recognizing that "future phases" "would be implemented as generation projects become certain and capacity is clearly required."[23] The DEIR/DEIS' attempt to rationalize a piecemealed approach is that "it may be 10 years [i.e., by 2024] before additional upgrades are needed."[24] This assumption is wrong on multiple fronts.

First, it is not accurate that additional upgrades will not be needed until 2024. The ZGlobal report relied upon by the DEIR/DEIS shows significant reliability violations in the 2019 "Cluster 7" scenario, which includes projects that will rely on the WOD Upgrade Project to achieve full deliverability. In other words, the Phased Build Alternative does not even fully meet the deliverability needs of projects slated to come online at the time the Proposed Project becomes operational, let alone meet the needs of subsequent future projects. For an additional critique of this assumption, see Section III.C.

Second, even assuming the DEIR/DEIS is correct that additional upgrades are not needed until 2024, the Phased Build Alternative fails to account for the fact that, as proposed, the first phase of this alternative would not be operational until the end of 2022 at the earliest, a *mere 2 years* before a "future" need date for a second phase beginning sometime in 2024. Because it can take years to prepare an application and obtain final approval from the CPUC and BLM,[25] SCE would be forced to submit an application for upgrades needed in 2024 while the project is under construction. See Section V, below, for more discussion of the risks of regulatory delays.

In short, the Phased Build Alternative would force a "do loop" of environmental review by segmenting the analysis into two or more separate environmental review cycles instead of a single document, which is not permitted by CEQA or NEPA. The DEIR/DEIS's approach of relying on a second phase to handle the reasonably foreseeable system need as a way to justify not building the entire project now, but then ignoring the second phase for purposes of environmental review is not only internally inconsistent, it is impermissible under CEQA and NEPA. While some future

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23 DEIRDEIR/DEIS, p. C-25. "Future phases" could include: "Reconductor the newly constructed 220 kV structures with higher capacity conductors; Replace the retained 220 kV structures with new, stronger 220 kV structures in order to carry heavier, higher capacity conductors; Install a single- or double-circuit 500 kV or 220 kV line in the vacant space remaining in the ROW." *Id*.

24 *Id*.

25 CPUC staff has indicated that it can take four to nine years to prepare the application, permit and construct a new transmission line. *See* CPUC, "Processes for Planning and Permitting Electric Transmission Projects in California," (Oct. 2011), available at http://www.cpuc.ca.gov/NR/rdonlyres/6D4D8AA9-CF49-4194-A4C6-DF394317EA6B/0/CPUCSidesFresnoAssmblyComTransmissionOct242011.pdf, Slide 7.

upgrades may not be well enough defined to be fully analyzed (e.g., the possibility of a new 500 kV line), it is *simply not correct* that no upgrades beyond the bare minimum needed to meet the initial phase are reasonably foreseeable. Therefore, to comply with CEQA and NEPA, the evaluation of the Phased Build Alternative must, at a minimum, be revised to address not just Basic Project Objective 1, but all reasonably foreseeable upgrades needed to meet system deliverability requests.

B. Phased Build Alternative Would Result In *Greater Environmental Impacts* Than The Proposed Project

The segmented approach of the Phased Build Alternative actually results in *greater environmental impacts* than the Proposed Project because it does not meet the system need. As such, it will force an additional project in the near-term to then meet the system need, thereby requiring multiple rounds of construction activities, possibly in short succession, prolonging the duration of noise and air pollutant exposure, while increasing land disturbance and associated impacts. In addition, the Phased Build Alternative requires additional construction impacts that are not required to construct SCE's Proposed Project.

1. The Phased Build Alternative Would Cause Additional Impacts Necessary for Wire-Stringing Operations

The DEIR/DEIS erroneously concluded that the environmental impact of the Phased Build Alternative will be less than those associated with SCE's Proposed Project. The assumption that the re-use of existing 220 kV double circuit structures for use with 795 ACCR would be less impactful than replacement of the 220 kV structures for use with 1590 ACSR fails to take into account numerous construction and other negative environmental impacts that will be caused by the Phased Build Alternative. It is clear that this assumption was made in the DEIR/DEIS without completing a full analysis of all that would be required in order to reuse towers with the 795 ACCR conductor, as well as the numerous feasibility issues associated with construction.

As discussed above, the Phased Build Alternative will require SCE to expand currently planned wire sites and to add new sites. While SCE has not completed its full analysis of all the additional wire sites that would be necessary, initial review has identified a significant number of additional wire sites would be required to construct the Phase Build Alternative. These additional wire sites would cause added disturbance and environmental impact that is not anticipated by the construction of the Proposed Project. In addition, due to the wire-stringing bending constraints of the 795 ACCR conductor, the wire-stringing sites planned for SCE's Proposed Project would need to be expanded to reduce the break-over angle. Expansion of these sites, where feasible, would result in additional disturbance area, a significant expansion of civil upgrades, and the potential for impacting sensitive species. The additional sites, as well as the expansion of sites, would significantly increase the overall project disturbance area and would result in additional noise, dust, visual, and other resource area impacts, as explained in the comment table.

2. The Phased Build Alternative Results in Towers That Will Not Be Aligned Which Can Lead to Conductor Blow-out And Increased Visual Impacts

Re-use of existing structures and construction of new structures, as called for in the Phased Build Alternative, will result in structures that will not line up in the ROW next to each other. In contrast, the Proposed Project pairs the new set of structures adjacent to each other (to the extent feasible) in order to minimize the visual impact of the structures and to achieve matched spacing between structures and lengths of conductor (commonly referred to as "spans"). Although the design of the Phased Build Alternative leads to additional visual impacts as compared to the Proposed Project, the DEIR/DEIS does not contain any visual simulations of the Phased Build Alternative, and as such, the public has not been provided with the opportunity to review and comment. This is a serious concern, as the Phased Build Alternative would result in towers that are not aligned and most likely more structures in the West of Devers corridor than the Proposed Project. In addition, the difference in conductor spans between the two adjacent lines could also create the potential for conductor contact between circuits and/or structures due to conductor sway during windy conditions (technically referred to "blow-out").

In order to eliminate the potential blow-out impact resulting from new and existing structures that are offset and do not have similar conductor spans, SCE would need to add additional structures on both the existing and new tower lines. Moreover, it may not be feasible to locate adequate additional structures to mitigate the impact of offset structures and mismatched conductor spans. Assuming additional structures could be installed, this scope of work would significantly increase the overall project disturbance area and would result in additional noise, dust, visual, and other resource area impacts as explained in the comment table. The impact of these additional structures were not even considered – much less, fully analyzed – in the DEIR/DEIS.

V. THE PHASED BUILD ALTERNATIVE IS NOT COST-EFFECTIVE AND WOULD DELAY THE PROJECT'S IN-SERVICE DATE

Based only on conceptual and speculative information, the DEIR/DEIS asserts that the Phased Build Alternative would have a reduced construction timeframe and would cost less than SCE's detailed, fully-planned Proposed Project. This analysis incorrectly dismisses the overall delay the Phased Build Alternative would cause to the project's in-service date and understates the necessary project scope elements, additional design and engineering work, new procurement and testing efforts and construction requirements in order to actually build the Phased Build Alternative.[26] SCE has not had sufficient time to develop a cost estimate for the Phased Build Alternative and cannot say with certainty that the cost to construct the Phased Build Alternative would be more or less than the cost to construct SCE's Proposed Project. SCE will continue to work through the missing scope elements to better understand the impact to the construction cost.

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[26] The DEIR/DEIS also ignores several SCE responses to Energy Division data requests in which SCE explained how alternatives that either reuse a portion of the existing double circuit 220 kV structures or move any new 220 kV structures closer to the center of the ROW would create many construction challenges and result in an overall delay to the project of at least 12 to 24 months. See, for example, SCE's responses to Data Request Numbers ALT-14, ALT-15A, ALT-15B, ALT-15C, ALT-17A, and ALT-17B.

Beyond the missing and understated scope elements for the Phased Build Alternative, the DEIR/DEIS cost assertion is flawed because it erroneously compares the cost-effectiveness of SCE's Proposed Project (with full capacity) against the much lesser capacity of the Phased Build Alternative, without taking into account the cost of the necessary next phase of the latter project needed to get the equivalent capacity, in order to make an "apples to apples" comparison. A simply analogy makes this clear: if we need to build a two story building, but decide today to build just the first story and then build the second story two years later, it is inaccurate to compare the cost of building just the first story to what it would cost to build both stories at one time—the valid analysis must compare the cost of a two-story building built over two years to the equivalent two-story building built all at once. It is hard to foresee a situation where the two-phased build out results in a lower cost than the Proposed Project, and SCE will evaluate this in more detail as it prepares for testimony in the case-in-chief. For these reasons, and as described in more detail below, the Phased Build Alternative is not cost-effective and would take longer to complete as compared to SCE's Proposed Project.

The DEIR/DEIS failed to accurately account for electrical and construction limitations associated with the Phased Build Alternative's 795 ACCR conductor. These limitations increase the scope of the project, thereby increasing the schedule and the costs. First, based on the electrical limitations, and as recognized by the study prepared by ZGlobal, a Special Protection System and 600 MVar of shunt capacitance would be needed for this project. Both of these elements are unaccounted for in the Phased Build Alternative's conceptual scope and would result in additional time and costs. Second, there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS:

- the need for interset structures to mitigate the potential of conductor sway or blow-out associated with mismatched conductor spans;
- the need for additional temporary structures and wire to minimize the need for line outages;
- the addition of new and expansion of proposed wire sites;
- the need for additional mobilization and demobilization of construction crews and additional environmental monitoring made necessary by more difficult outage requirements.

These added construction requirements would necessitate additional costs and would also cause delays to the project schedule, resulting in additional project management and project support costs.

SCE sought further information from the Energy Division regarding the schedule and cost assumptions included in the DEIR/DEIS, and the Energy Division was only able to provide limited information. Notwithstanding the assumptions that were not provided, the Energy Division did include a few assumptions that must be addressed. The Energy Division's response correctly assumes that there would be a reduction in labor costs associated with removing fewer of the existing 220 kV structures, as well as labor and material cost savings associated with constructing fewer new 220 kV structures. The Energy Division's response also correctly assumes that the 795 ACCR conductor is significantly more costly than the Proposed Project's conductor (double-bundle 1590 ACSR conductor), however, it fails to calculate the impact of the difference. Based on limited research, the 795 ACCR conductor seems to be approximately 4-5 times as costly as 1590 ACSR conductor. Taking into account the assumption that the Phased Build Alternative would require

approximately 45% less conductor (single vs. double-bundle), the conductor costs for the Phased Build Alternative would still be significantly more than that for the Proposed Project.

The Energy Division's response, then, implausibly asserts that the labor cost for conductor installation would be 35 to 40% less than conductor installation for the Proposed Project, based on the assumption that installing a single conductor takes less time to install than a double-bundle conductor. This conclusion is flawed, as the construction limitations associated with a more limited bending angle for the 795 ACCR conductor would actually increase the labor cost for installing this conductor. Furthermore, pulling single conductor has no real labor savings as compared to double-bundle conductor because the "double-bundle" is pulled together, not separately, and single conductor cannot be pulled faster.

In addition to the increased labor cost to install the 795 ACCR conductor, there would be additional costs associated with the wire-pulling equipment that would be needed, as well as potentially increased costs for the line hardware materials used to attach the conductors to the transmission structures. These costs do not appear to be reflected in the Energy Division's assumptions.

Lastly, the Energy Division's response asserts there would be a cost savings from eliminating the need for the subtransmission scope, as the Phased Build Alternative assumes that there would be sufficient space to pull the new conductor through Segment 1 without relocating the subtransmission lines.[27] Therefore, this presumed savings may not actually be realized.

The DEIR/DEIS correctly recognizes that the 795 ACCR conductor has higher electrical losses when compared to the electrical losses of the Proposed Project conductor. In this same general discussion, the DEIR/DEIS asserts that electrical losses have an economic consequence, but those consequences do not appear to be accounted for in asserting that the Phased Build Alternative would be less costly than SCE's Proposed Project. SCE has started to analyze the cost of electrical losses. Early indications suggest that these electrical losses are not trivial and could reach into several millions of dollars per year more for the Phased Build Alternative than for the Proposed Project.

As explained in SCE's responses to data requests, the Phased Build Alternative would require additional design and engineering work, additional conductor procurement and testing, and cause construction delays that would extend the overall project in-service date by approximately two years. This delay would increase the costs of the Phased Build Alternative associated with extended project management, project support and environmental compliance. Additional costs could also be identified after the necessary design and engineering is completed, in order to get to an equivalent engineering level and scope definition as the Proposed Project. If the necessary engineering and scope definition is not completed until after the Commission's decision is issued and the Phased Build Alternative is subsequently found to be infeasible or requiring further environmental review, SCE would have to re-open the CPCN process through a petition for modification to request the changes needed to make it constructible and/or environmentally-

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[27] SCE's Proposed Project called for the removal and relocation of two miles of 66 kV subtransmission lines to make space in the West of Devers corridor for the upgraded and relocated 220 kV transmission lines.

compliant. This could add up to an additional 12 months of delay further impacting cost and schedule.

The flaw in the assertion that the Phased Build Alternative is less costly than the Proposed Project is most apparent in the failure to conduct a comparable cost-effectiveness analysis, taking into account costs and differences in capacity. In comparing economic projects or even policy-driven projects, it is standard to develop a cost-effectiveness analysis that includes capacity. In this case, the use of double-bundle 1590 ACSR conductor provides substantially more capacity compared to the 795 ACCR conductor. Based on this simplifying fact, and not factoring into account other project-driven costs such as the cost of electrical losses, the construction cost of the Phased Build Alternative would need to be substantially less than the construction cost of the Proposed Project in order to conclude that the Phased Build Alternative is less costly than the Proposed Project. SCE asserts that based on its high-level understanding of the scope of the Phased Build Alternative, this is not the case.

The phased-approach of the Phased Build Alternative would result in greater overall costs, impacts, and risks. A phased-approach is less efficient than the single, coordinated construction effort contemplated by the Proposed Project, as it would result in duplicating many activities, which exacerbates the environmental impacts and overall costs. Examples include repeating environmental studies, engineering studies, licensing activities, and having to effectively construct twice. A phased-approach also interjects additional risks that can be significant. A lower transfer capability would limit the network's ability to meet deliverability requirements of generators, increase system constraints, and cause other potential system problems, all of which could result in even greater costs to ratepayers.

For all of the reasons stated above, the DEIR/DEIR should state that although the Phased Build Alternative would result in some schedule and cost reductions associated with removing and installing fewer 220 kV structures, the Phased Build Alternative does not meet SCE's Project Objectives #4 and #6 because it would delay the project's in-service date and would not be as cost-effective as the SCE's Proposed Project, due to other scope elements of the Phased Build Alternative, a much smaller increase in transfer capability, and the fact that the next phase would result in another round of design, engineering, licensing, construction and environmental costs and impacts.

VI. THE REQUIREMENT TO OBTAIN A VARIANCE FROM LOCAL JURISDICTIONS FOR NOISE IMPACTS SHOULD BE STRICKEN OR REVISED

The DEIR/DEIS concludes that the Proposed Project will result in a significant and unavoidable impact from construction noise (Impact N-1). Mitigation Measures N-1a and N-1b would reduce the impact, but it would remain significant and unavoidable.

SCE requests clarification of additional language in the DEIR/DEIS regarding local agency variances for certain construction activities. Specifically, the DEIR/DEIS states:

> With implementation of the recommended mitigation measures, the construction activities would either comply with local noise

> ordinances, *or SCE would request a variance from each affected jurisdiction. SCE would similarly request a variance if there is a need to work outside of normal daytime, weekday hours*.[28]

Similarly, Mitigation Measure N-1a provides in pertinent part:

> Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) *or an alternative schedule established by the local jurisdiction*.[29]

The CPUC has made clear that regulated public utilities are not required to obtain local agency discretionary approvals related to the construction of major transmission lines such as the Proposed Project, including local noise variances. For example, in the CEQA Findings of Fact for Tehachapi Renewable Transmission Project, the CPUC reiterated this determination:

> "the CPUC has preemptive authority over local jurisdictions with regard to the regulation of electrical power lines and electric facilities constructed by public utilities. (See CPUC General Order 131-D.) Therefore, the Project and other **projects subject to the CPUC's jurisdiction are not required to obtain approvals from local agencies, including variances from local noise ordinances**."[30]

This well-established authority is grounded in the California Constitution, the Public Utilities Code, and General Order 131-D.[31]

Further, CEQA does not require a local agency noise variance to address Impact N-1 for at least three reasons. First, CEQA requires mitigation measures to reduce significant environmental impacts, but a noise variance does not reduce or eliminate a significant environmental impact. Instead, a variance allows legal non-compliance of otherwise applicable noise standards in certain circumstances. Although the Proposed Project will likely result in construction activities that exceed some local noise standards, this is typical for major infrastructure projects, including, but not limited to, transmission line projects. In many cases, after-hours or extended construction *reduces* disturbances by minimizing the impact on local traffic and the public. Limiting construction

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28 DEIR, p. D.13-17 (emphasis added).

29 DEIR, p. D.13-18 (emphasis added).

30 TRTP Findings of Fact, p. 290 (emphasis added).

31 The California Constitution, Article XII, Section 8, states, a "city, county, or other public body may not regulate matters over which the Legislature grants regulatory power to the [Public Utilities] Commission...." Public Utilities Code Section 701 states, "[t]he Commission may supervise and regulate every public utility in the State and may do all things, whether specifically designated in this part or in addition thereto, which are necessary and convenient in the exercise of such power and jurisdiction." Further, General Order 131-D "clarifies that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction." General Order 131-D, Section XIV(B).

activities to regular hours could ultimately increase environmental impacts overall by increasing disruptions and delaying other aspects of the project.

Second, if SCE is unable to obtain a local noise variance within a reasonable period of time despite SCE's best efforts, then the mitigation is considered "infeasible" for purposes of CEQA, as defined above. CEQA disallows the imposition of infeasible mitigation. Recent history demonstrates that, in some circumstances, it has been not been feasible to obtain local noise variances within a reasonable period of time, even after using best efforts.

Third, the purpose of any such variance request is to ensure appropriate standards are put in place to minimize noise disturbances to sensitive receptors while allowing construction activities to proceed based on the project schedule. To the extent that a noise variance request is included in the EIR/EIS, this purpose can be satisfied by either receiving an approval from the affected local agency or, if the local agency declines to act on a request in a reasonable period of time, then by the CPUC staff. In either instance, SCE would not proceed with the applicable construction activities until authorized.

For these reasons, SCE prefers having the variance language stricken from the EIR/EIS. If the language is not removed, SCE proposes revised language in the body of its comments to address this issue, which, at a minimum, should be incorporated into the EIR/EIS.

VII. THE VISUAL RESOURCES ANALYSIS IS FLAWED AND NOT CONSISTENT WITH CEQA

The DEIR/DEIS analysis of Visual Resources identifies significant impacts during construction and imposes mitigation measures that are fundamentally flawed and not consistent with CEQA.

A. For Construction Activities, Sweeping Mitigation Would Require Staff to Re-Analyze The Project Post-Approval, Resulting In An Unknown Number Of Design Changes Even Though Information Is Available Now To Include The Analysis In The EIR/EIS

For construction activities (Impact VR-4), the DEIR/DEIS concludes that, within Segments 2, 3, 4 and 6, construction of the Proposed Project on hilltops and hillsides may create views of newly graded terrain, which constitutes a potentially significant impact. To mitigate this impact, Mitigation Measure VR-4a requires SCE to submit a "map book and description of **all** access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6" (emphasis added), which will be analyzed by the CPUC's Visual Specialist "to assess in-line visibility of these Proposed Project features" from undefined "sensitive viewing locations." Based on this post-approval analysis, SCE may be required to redesign the project to address findings and recommendations from the CPUC and BLM visual specialists.

In essence, Mitigation Measures VR-4a creates a process whereby, *after* the EIR/EIS is approved, staff will *re-analyze* every spur road, retaining wall, and ground disturbance area within Segments 2, 3, 4 and 6 resulting in an unknown number of project design changes even though the information is already available and could be included in the EIR/EIS. These design changes may raise new environmental or engineering constraints, which could lead to further delays and

uncertainty. These concerns are even further magnified when the process created by Mitigation Measure VR-4 is applied to the Phased Build Alternative, as there has only been minimal engineering conducted on the Phased Build Alternative to-date, in contrast to the extensive, detailed engineering that SCE has already completed for the Proposed Project. This mitigation strategy is fundamentally flawed and not allowed under CEQA.

First, CEQA requires an EIR to evaluate and conclude whether specific activities are significant, not simply reach generalized findings. An EIR cannot merely label an impact significant without first providing a detailed discussion and analysis supporting the specific impact conclusion.

Between the PEA and SCE's responses to data requests, there is ample information about the Proposed Project's ground disturbance, retaining walls and spur roads to determine which specific construction activities and locations may cause significant impacts to visual resources. In other words, the EIR/EIS must identify *which specific* spur roads, retaining walls or grading areas will result in a potentially significant impact and not simply conclude that such activities could generically cause potentially significant impacts across the entirety of Segments 2, 3, 4 and 6.

Evidence indicates that there are few, if any, areas within Segments 2, 3, 4 and 6 where construction ground disturbance, retaining walls and spur roads will result in a potentially significant visual impacts requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established right-of-way with existing transmission line infrastructure, substantially reducing the potential for significant visual impacts.

Second, Mitigation Measure VR-4a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some locations with potentially significant impacts within Segments 2, 3, 4 and 6 does not justify a post-approval analysis for the entirety of Segments 2, 3, 4 and 6. CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. In cases where mitigation measures include future analysis, the mitigation measure must identify specific performance standards by which the analysis will be applied. CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis.

While some impact determinations require post-approval analysis, that is *not* the case here. SCE has already submitted the large majority of information contemplated by Mitigation Measure VR-4a. This means the analysis can be completed in the EIR/EIS, which is what CEQA and NEPA intend. To the extent that some additional analysis is required, it should be limited to specific locations where: (1) the EIR identifies a potentially significant impact, not the entirety of the Segment 2, 3, 4 and 6; and (2) the final design is materially different from the design that SCE has already provided.

Third, to the extent that SCE must incorporate additional design features to mitigate potentially significant impacts from ground disturbance, retaining walls or spur roads, the options should be clearly identified in Mitigation Measure VR-4a. Additionally, these options should explain the potential schedule and cost impacts to allow the Commission and the public to have a full understanding of the proposed mitigation. Accordingly, Mitigation Measure VR-4a should identify the design measures that SCE can apply prior to final design to ensure visual impacts are

reduced to less than significant levels. Post-approval evaluation by the CPUC's Visual Specialist can then be limited to determining whether SCE has applied the appropriate measures.

SCE has respectfully proposed removal of Mitigation Measure VR-4a to address this comment.

B. For Operational Impacts, the DEIR/DEIS Applies Onerous Mitigation Across the Entire Project Even Though Only A Select Few Locations Result in Significant Visual Impacts

For operational visual impacts, the DEIR/DEIS identifies four discrete locations where there will be significant visual impacts. For the large majority of the project's 48 corridor miles, impacts as a result of SCE's Proposed Project will be either beneficial or less than significant. Nevertheless, the DEIR/DEIS imposes onerous mitigation measures across the entirety of the project.

Under CEQA, mitigation can only be required to reduce significant impacts, and where mitigation is applied, it must be limited in scope by having an "essential nexus" to the nature of the impact and be "roughly proportional" to the scale of the impacts of the project.

In contrast to the clear limits imposed by CEQA, the DEIR/DEIS applies Mitigation Measures VR-8a and VR-9a across the entirety of the project, not just the locations where a significant visual impact would occur. The DEIR recommends that Measures VR-8a and VR-9a apply to sections with a less than significant impact to "further reduce the adverse visual effects," and to sections with beneficial impacts to "further ensure that the resulting impacts are an improvement and are, in fact, beneficial."

Simply put, this approach is not consistent with CEQA. Mitigation measures should only be applied to reduce significant environmental impacts, not to "further reduce" less than significant impacts or to ensure that beneficial impacts occur. As proposed, Mitigation Measures VR-8a and VR-9a would impose substantial costs and effort on SCE that are not connected to or roughly proportional to the limited nature of the impact.

As discussed in the PEA, SCE will reduce visual impacts across the entirety of the project by applying design features intended to reduce visual effects, including revegetation, recontouring, use of appropriate materials, light shielding, and glare reduction as appropriate. However, except for the limited locations identified in the DEIR/DEIS where significant visual impacts will occur, no additional mitigation is permitted under CEQA. As such, SCE respectfully proposes removal of Mitigation Measures VR-8a and VR-9a.

VIII. SOLAR PROJECTS ARE NOT "CONNECTED ACTIONS" UNDER NEPA AND ARE MORE APPROPRIATELY ANALYZED AS CUMULATIVE IMPACTS

The DEIR/DEIS identifies seven solar generation projects ("Solar Generation Projects") as "connected actions." Under NEPA, actions are connected if they: "(i) automatically trigger other actions which may require environmental impact statements; (ii) cannot or will not proceed unless other actions are taken previously or simultaneously; (iii) are interdependent parts of a larger action and depend on the larger action for their justification." 40 C.F.R. § 1508.25(a)(1).

It is well settled law that the Ninth Circuit applies "an 'independent utility' test to determine whether multiple actions are so connected as to mandate consideration in a single EIS." *Cal. ex rel. Imperial Cnty. Air Pollution Control Dist. v. U.S. Dept. of the Interior*, 767 F. 3d 781, 795 (9th Cir. 2014) (quoting *Great Basin Mine Watch v. Hankins*, 456 F. 3d 955, 969 (9th Cir. 2006) (quoting *Wetland Actions Network v. U.S. Army Corps of Eng'rs*, 222 F. 3d 1105, 1118 (9th Cir. 2000)).

Independent utility is established "when one of the projects might reasonably have been completed without the existence of the other, the two projects have independent utility and are not 'connected' for NEPA's purposes.'" *Sierra Club v. Bureau of Land Mgmt.*, No. 13-15383, 2015 U.S. App. LEXIS 8728 (9th Cir. May 27, 2015) (citing *Pac. Coast Fed. of Fishermen's Ass'ns v. Blank*, 693 F.3d 1084, 1098 (9th Cir. 2012) (citing *Great Basin Mine Watch v. Hankins*, 456 F. 3d 955, 969 (9th Cir. 2000)).

Multiple actions can have independent utility even if they have "overlapping, but not co-extensive, goals." *Pac. Coast Fed. of Fishermen's Ass'ns*, 693 F.3d at 1098-1099 ("While it is true the record is replete with statements about how Amendments 20 and 21 are linked, two actions are not connected simply because they benefit each other or the environment.) This point was squarely addressed by the Ninth Circuit in *Sylvester v. U.S. Army Corps of Eng'rs*, 884 F. 2d 394 (9th Cir. 1989), where a developer proposed a resort in Squaw Valley, California, which included skiing facilities, a resort village, and a golf course. The golf course was to be located on a meadow, while the resort and ski runs were to be situated on neighboring uplands. The meadows contained pockets of wetlands, which triggered NEPA review of the proposed plan by the Army Corps of Engineers. In its evaluation of the Proposed Project, the Army Corps considered only the impacts of the golf course, and not the impacts of the rest of the resort complex, because it viewed its jurisdiction to extend only to the meadows containing the wetlands. A third party challenged the Army Corps' decision, asserting that the Army Corps improperly limited the scope of its NEPA analysis to the golf course rather than reviewing the environmental impact of the entire proposed resort. The district court granted the third-party's request for a preliminary injunction enjoining the construction of the proposed golf course.

The Ninth Circuit reversed. While acknowledging that federal agencies cannot divide projects to avoid meaningful NEPA review, the Ninth Circuit held that the Army Corps' decision to limit its review to only the wetlands was proper because "each could exist without the other, although each would benefit from the other's presence." *Id*., at 400.

Applied here, West of Devers and the Solar Generation Projects are not connected actions because "one of the projects might reasonably have been completed without the existence of the other," meaning "the two projects have independent utility and are not 'connected' for NEPA's purposes." *See Sierra Club v. Bureau of Land Mgmt.*, No. 13-15383, 2015 U.S. App. LEXIS 8728 (9th Cir. May 27, 2015).

Even though SCE proposed the WOD Upgrade Project in part to satisfy the full deliverability requests of certain generators, including the Solar Generation Projects, SCE identified independent purposes for the project. Specifically, other independent purposes of West of Devers include:

- Support California's greenhouse gas reduction program;

- Support federal renewable energy goals;
- Support goals of the California Energy CPUC Integrated Energy Policy Report; and
- Support the Desert Renewable Energy Conservation Plan.

By supporting these other objectives, the WOD Upgrade Project has utility that is independent of the objective to interconnect the Solar Generation Projects. As such, the WOD Upgrade Project has independent utility from the Solar Generation Projects. Similarly, the Solar Generation Projects have independent utility separate from the WOD Upgrade Project, such as facilitating the goals of the DRECP and meeting state and federal renewable energy goals.

In contrast, the DEIR/DEIS does not properly apply the independent utility test. The DEIR/DEIS concludes the Solar Generation Projects are connected actions because the WOD Upgrade Project is needed to ensure the full deliverability of these projects. SCE does not dispute this fact. However, even though the Solar Generation Projects need the WOD Upgrade Project for full deliverability, the projects are not connected actions under NEPA because the WOD Upgrade Project has independent utility. As the Ninth Circuit held in *Sylvester*, two projects can have independent utility even if each project benefits the other.

A conclusion of independent utility is supported by the fact that the WOD Upgrade Project and the Solar Generation Projects will each undergo separate and complete environmental review. The Ninth Circuit has emphasized that the purpose behind the connected actions requirement is to ensure that environmental review is not avoided by segmentation. *See Pac. Coast Fed. of Fishermen's Ass'ns*, 693 F.3d at 1099 ("Perhaps more important than parsing NMFS's words or predicting whether it would adopt one Amendment without the other is answering the question whether, in preparing separate EISs, NMFS evaded its duty to fully study the combined effects of Amendments 20 and 21. This is the real concern behind [40 C.F.R.] § 1508.25.")

With the Solar Generation Projects, as in *Pac. Coast Fed.*, "This 'divide and conquer' concern is not present here." *Id*. The Solar Generation Projects will each undergo full environmental review under CEQA and/or NEPA, as appropriate. In addition, the Solar Generation Projects will be analyzed as cumulative impacts even if not considered connected actions, ensuring that environmental effects are not being ignored. *See,* 179 Interior Board of Land Appeals (IBLA) 148, 173 (2010) ("[Plaintiff] offers no argument or evidence that any cumulative impact is likely to be ignored or overlooked were the [transmission] line and any of the identified wind farm projects to be considered separately.")

Instead of being connected actions, the Solar Generation Projects are more properly analyzed as cumulative impacts. CEQA requires an EIR to evaluate cumulative impacts of a project, which are defined as two or more individual effects which, when considered together, are considerable or compound or increase other environmental impacts. CEQA Guidelines § 15355. "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects." CEQA Guidelines § 15355(b).

NEPA also requires consideration of cumulative effects, defined as "the impact on the

environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 C.F.R. § 1508.7. While courts have held that "reasonably foreseeable" actions do not include "highly speculative" harms, they do include impacts "'sufficiently likely to occur that a person of ordinary prudence would take it into account in reaching a decision.'" *City of Shoreacres v. Waterworth*, 420 F.3d 440, 453 (5th Cir. 2005).

Here, because the Solar Generation Projects are reasonable foreseeable future projects related to West of Devers, but not connected actions, they should be considered in the cumulative impacts analysis of the DEIR/DEIS.

IX. CONCLUSION

SCE has identified multiple issues associated with the Phased Build Alternative and certain of the mitigation measures proposed in the DEIR/DEIS. From the information presented in this letter and the associated attachments, the Phased Build Alternative is not the Environmentally Superior Alternative and must be discarded in the FEIR/FEIS as a project alternative, or, at a minimum, the FEIR/FEIS should identify its serious feasibility constraints and increased environmental impacts compared to the Proposed Project. The Phased Build Alternative's failure to meet most of the basic project objectives, its greater environmental impacts, and the feasibility issues identified herein demonstrate that it is not an environmentally superior alternative to the Proposed Project and therefore should be rejected.

Very truly yours,

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Attachment A
SCE's Transmission Planning Assessment of the
DEIR/DEIS's Phased Build Alternative

Attachment A provides a summary of SCE's review of the DEIR/DEIS's Phased Build Alternative. This document concludes that the Phased Build Alternative has serious flaws and that SCE's Proposed Project is superior to the Phased Build Alternative based on several factors, as described below.

1. The DEIR/DEIS Confuses the Conductor Name Plate Capacity With the Maximum Corridor Transfer Capability.

The conductor name plate provides an indication of the maximum flow that can be carried on the conductor under normal and emergency conditions in the absence of other system limitations. In the case of the West of Devers ("WOD") corridor, the maximum flow capability is approximately 3,000 MW with the use of 795 ACCR conductor and 4,800 MW for the double-bundle 1590 ACSR conductor. This maximum value ensures the power flow stays within the emergency thermal rating of the conductor upon the loss of any two transmission lines west of Devers Substation in accordance with the NERC Reliability Standards, and includes the reliance on a Remedial Action Scheme (RAS) that trips generation so the power flow stays within allowable limits. The 3,000 MW for the 795 ACCR conductor and 4,800 MW for the double-bundle 1590 ACSR is based on conductor name plate limitation and does not take in account any other system conditions.

To determine the actual flow that can be carried on the WOD corridor with the use of a specific conductor, thorough power flow and dynamic stability analyses are required. These complete set of analyses are needed to evaluate other critical system parameters, such as reactive losses, voltage condition, and power angles. As such, the conductor name plate capacity all by itself does not equal system deliverability or capability.

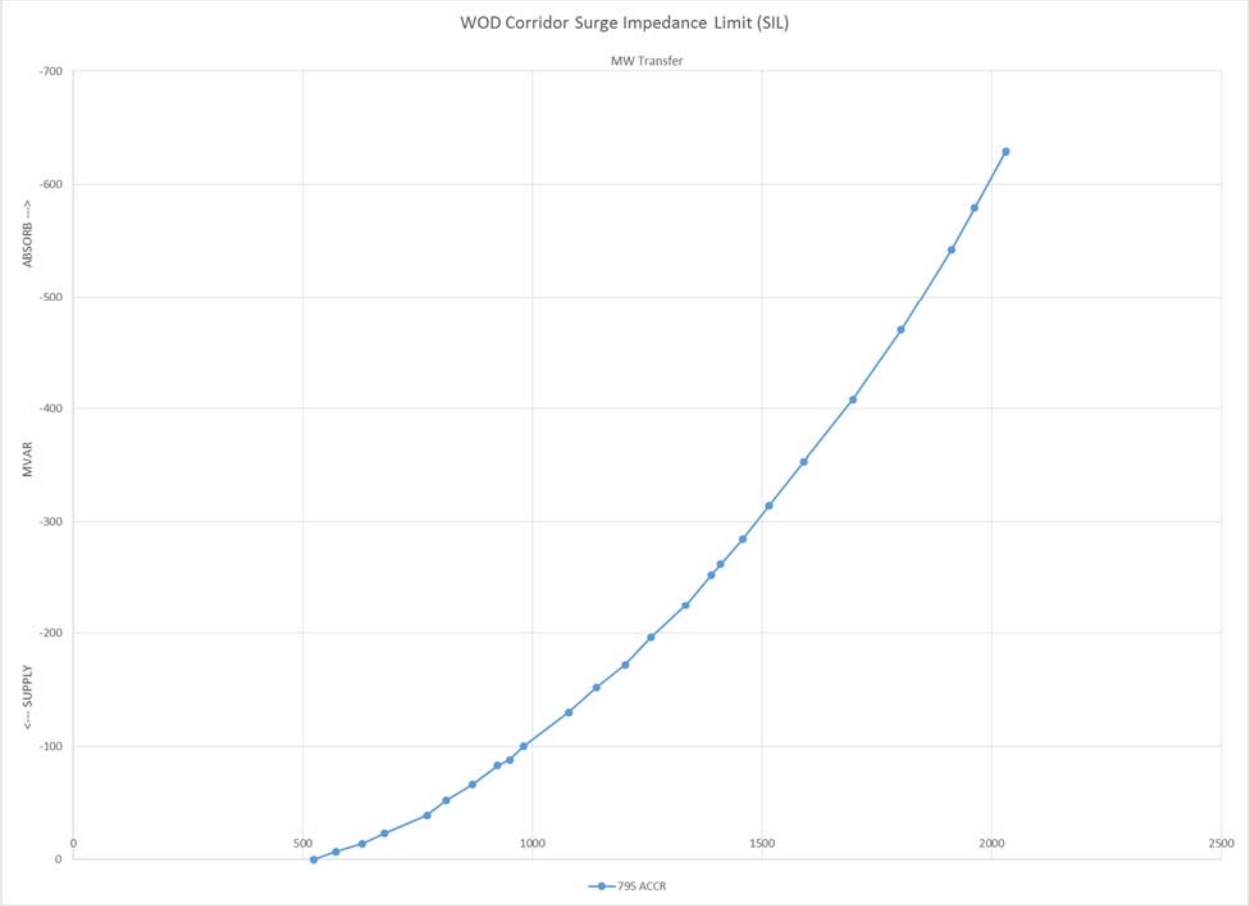
For example, in the power flow analysis conducted by ZGlobal in Case 6, the use of 795 ACCR conductor would limit the flow through the WOD corridor to approximately 1,900 MW due to system voltage instability caused by excessive reactive power losses.[1] This is due to the high impedance of 795 ACCR conductor coupled with the amount of current flowing through the conductor. When the loading through the WOD corridor exceeds the 795 ACCR conductor's Surge Impedance Loading (SIL),[2] the 795 ACCR conductor acts like a shunt reactor - absorbing reactive power (MVAR) from the system, which is referred to as MVAR losses on the line. This results in a decrease in system voltage, leading to a higher

[1] DEIR/DEIS, Appendix 5, Attachment 2, Power Flow Analysis report completed by ZGlobal, Case #6 conclusion, p. 12.

[2] Surge Impedance Loading (SIL) is the MW loading of a transmission line at which a natural reactive power balance occurs.

potential for system voltage instability. Thus, the 1,900 MW limitation safeguards against system voltage instability due to the excessively high MVAR losses on the 795 ACCR conductor.

As illustrated in the SIL chart below, the reactive losses on the 795 ACCR conductor are approximately 570 MVAR when the flow through the WOD corridor is approximately 1,900 MW.



In addition to the excessive MVAR losses limiting the maximum flow on the WOD corridor, the higher impedance of 795 ACCR conductor would incrementally increase the flow on the transmission lines parallel to the WOD corridor, such as the Valley – Alberhill 500 kV line. ZGlobal's Case 6 demonstrated that the use of 795 ACCR would increase the loading on the Valley – Alberhill 500 kV line by 4% as compared to the double-bundle 1590 ACSR conductor.[3] The Valley – Alberhill 500 kV line has been identified in previous Generation Interconnection Studies to be the next system limitation for delivering resources west of

[3] The 4% increase is the difference between the loading on Valley – Alberhill on table B2 and B3 provided by ZGlobal in DEIR, Appendix 5, Attachment 2, Appendix A "Analysis results tables & Power Flow Plots," pp. 24 and 26.

Devers Substation, and therefore the use of 795 ACCR conductor would expedite the need for additional system upgrades.

In contrast, the use of double-bundle conductor doubles the SIL and minimizes the MVAR losses, thus the potential for voltage instability is minimized. In addition, the double-bundle 1590 ACSR conductor has a lower impedance value, which allows higher flow through the WOD corridor under comparable assumptions; up to approximately 3000 MW, before the next system upgrade is triggered.

2. The ZGlobal Analysis Supporting the Phased Build Alternative Is Flawed.

A. The ZGlobal Study Misapplies System Reliability Study Methodology to Resource Deliverability Analysis.

The purpose of performing System Reliability studies is to identify reliability network upgrades needed to serve the study year load forecast. The CAISO's Reliability base cases dispatch generation throughout the CAISO's control grid and limits local renewable resources to certain dispatch levels in an attempt to segregate upgrades required for new generation from upgrades needed to serve load. In other words, the dispatch levels set by the CAISO in the Reliability cases are intended to eliminate any network upgrades needed for new generation and only identify network upgrades needed to meet the study year load forecast. For example, the CAISO's 2024 Reliability Base Case that was used to validate the DEIR/DEIS Phase Build Alternative limits Photovoltaic and Solar Thermal to 36% and Wind resources to 0% of its maximum capability. This way, any reliability network upgrades identified from the CAISO's 2024 Reliability studies would be solely triggered as a result of the need to serve 2024 system load forecast.

In contrast, the CAISO develops Policy Base Cases to identify delivery network upgrades to ensure that generation capacity is not constrained from a Resource Adequacy perspective. The deliverability study methodology simultaneously dispatches all generation resources in a cluster area seeking full deliverability status to identify delivery network upgrades.

Given that the delivery network upgrades cannot be identified in the Reliability base case, the conclusion of the DEIR/DEIS that the Phased Build Alternative would provide 2,200 MW of deliverability based on CAISO's 2024 Reliability Base Case[4] is flawed. To adequately determine the actual MW of deliverability that can be achieved by the Phase Build Alternative, a deliverability study is needed that is consistent with the CAISO's deliverability study methodology.

[4] DEIR/DEIS, Appendix 5, Consideration of CEQA/NEPA Criteria under Project Objectives Purpose and Need, p. Ap.5-48.

B. The ZGlobal Studies Did Not Demonstrate That the Use of 795 ACCR Conductor As Proposed in the Phased Build Alternative Would Increase System Deliverability by At Least 2,200 MW.

The Phased Build Alternative relied on a power flow analysis prepared by ZGlobal, included in Appendix 5 of the DEIR/DEIS, to determine that the alternative conductor (795 ACCR conductor) would increase system deliverability to 2,200 MW. However, none of the ZGlobal Cases demonstrated that the selection of 795 ACCR conductor would actually increase system deliverability by at least 2,200 MW.

ZGlobal's Case 3 was the only Case which concluded that the 795 ACCR conductor is a feasible alternative conductor. However, Case 3 did not properly model Basic Project Objective 1, which is to increase system deliverability by at least 2,200 MW to meet the CAISO's initial group of five solar power generation projects interconnecting at Colorado River and Red Bluff Substations.[5] A detailed review of Case 3 indicates that this Case only assumed 1,387 MW of generation resources at Colorado River and Red Bluff substations, which is significantly less than 2,200 MW identified in the DEIR's Basic Project Objective 1. In addition, today, there are 1,050 MW of generation is on line at Colorado River and Red Bluff substations. Therefore, based on Case 3, only a total of 337 MW of additional new resources could develop at both Colorado River and Red Bluff substations, which is significantly less than 1,929 MW[6] with executed generator interconnection agreements at this time.

Assuming only 337 MW of new generation at Colorado River and Red Bluff Substations significantly downplays the importance of both the Colorado River and Red Bluff Substations for interconnecting new renewable resources. The unrealistically low level of generation at Colorado River and Red Bluff Substations ignores the resources currently under development. The renewable generation projects are aligning their in-service dates with completion of the WOD Upgrade Project to minimize potential curtailments and obtain Full Capacity Deliverability Status (FCDS).[7]

Furthermore, with the inclusion of Cluster 8, there are sixteen (16) generation projects totaling 6,072 MW, which would all require the WOD Upgrade Project to support FCDS. Five (5) projects have executed GIAs with SCE for a total of 1,859 MW that require the WOD Upgrade Project for FCDS.

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5 DEIR/DEIS Executive Summary, Basic Project Objective 1, p. ES-6.

6 The 1,929 MW consist four projects (Q294, 365, 576, and 643AE), totaling 1,359MW, require the WOD upgrades for FCDS and two projects (Q17 and 219) totaling 570MW that would increase the flow on the WOD corridor.

7 Refer to the generation projects letters provided in SCE's testimony and in SCE's response to data request ALT-17D

In addition, Base Project Objective 1[8] indicates that the Phase Build Alternative would provide FCDS to generation listed in Table Ap.5-3 of Appendix 5 and this conclusion was satisfied by utilizing the CAISO's 2024 Reliability Base Case (Case 3). Table Ap.5-3 includes 10 generation projects, totaling 3,029 MW, with an interconnection request to Colorado River and Red Bluff Substations. Case 3 limits the generation resources dispatched at Colorado River and Red Bluff Substations to 1,387 MW and therefore does not demonstrate that the Phase Build Alternative would provide FCDS to generation listed in table Ap.5-3.

Based on the reasons above, Case 3 does not demonstrate that 795 ACCR conductor would meet the Basic Project Objective 1 of increasing deliverability to at least 2,200 MW for those resources which are seeking interconnection at the Colorado River and Red Bluff Substations.

The DEIR/DEIS Phased Build Alternative's failure to meet the Basic Project Objective 1 of increasing deliverability to 3,000 MW of the output from new generation projects[9] is further revealed to be flawed by reviewing the ZGlobal studies for Case 6. Case 6 modeled the use of 795 ACCR conductor and included approximately 2,628 MW of new not yet existing generation resources at Colorado River and Red Bluff Substations. ZGlobal concluded that the use of 795 ACCR conductor under the Case 6 study assumptions was "not technically feasible." (ZGlobal)[10] This conclusion clearly states that the use of 795 ACCR conductor cannot possibly accommodate 2,628 MW of new generation at Colorado River and Red Bluff Substations.

Given that Case 3 was based on an incorrect assumption of the generation levels at Colorado River and Red Bluff Substations, and Case 6 concluding that the 795 ACCR is "not technically feasible," the power flow analysis conducted by ZGlobal failed to demonstrate that the 795 ACCR alternative conductor would meet the DEIR/DEIS's stated Objective 1.

C. <u>ZGlobal Misrepresented the MW Capacity That Require the WOD Upgrades.</u>

The following statement by ZGlobal is incorrect "This leaves approximately 1881 MW requiring the WOD upgrades – a greater than 300 MW decrease from the original TC Study requirement of 2200 MW".[11]

The DEIR/DEIS interpreted the CAISO's response out of context. Generation projects listed in Table 1 in the CAISO's response only includes projects in the queue that would

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8 DEIR/DEIS, Appendix 5, Basic Project Objective 1, p. Ap.5-48.

9 DEIR/DEIS, Appendix 5, Project Objectives Purpose and Need section, p. Ap.5-48.

10 DEIR/DEIS, Appendix 5, Attachment 2, Power Flow Analysis report completed by ZGlobal, Case #6 conclusion, p. 12.

11 DEIR/DEIS, Appendix 5, Attachment 2, A Power Flow Analysis report provided by ZGlobal, p. 6.

be adversely impacted by a delay to the WOD Upgrade Project. This list did not include projects that were granted FDCS with the existing facilities or FCDS with the inclusion of the Interim WOD Project. While those projects that are currently utilizing the Interim WOD Project would not be adversely impacted by a delay in the project, they ultimately need the WOD Upgrade Project. The Interim WOD Project is a temporary mitigation solution that is not electrically compatible with the WOD Upgrade Project and would be removed upon completion of the WOD Upgrade Project. Therefore, the 1,881 MW assumption must additionally account for two Transition Cluster projects (Q193, and 294) totaling 985 MW that would need a solution robust enough to grant the requested FCDS to these two projects on a permanent basis. As such, the WOD Upgrade Project must provide FCDS for at least 2,866 MW (1,881 MW described by ZGlobal and 985 MW for Q193 and Q294) and not 2,200 MW as described in Basic Objective 1.

In addition, the capacity provided by the WOD Upgrade Project should not be limited to 2,866 MW. Instead, it should be designed to provide additional transfer capability for future developments such as new generation resources seeking interconnection to Red Bluff and Colorado River Substations as part of Queue Cluster 8. Currently, there are seven (7) projects in CAISO's Cluster 8, totaling over 3,600 MW that submitted interconnection requests seeking FCDS for their proposed generation facilities. These new generation projects would also rely on the WOD Upgrade Project to support FCDS. Therefore, the use of 795 ACCR conductor does not provide adequate support for expected generation developments at both Colorado River and Red Bluff Substations.

D. <u>The DEIR/DEIS Made Flawed Assumption About the WOD Upgrade Project Based Upon the Entire CAISO Queue.</u>

The following statement made in the ZGlobal analysis is inapplicable to the WOD Upgrade Project: "The CAISO queue overall, through Cluster #7, had approximately 1179 projects submitted. The number of projects withdrawn is 892. That represents a nearly 76% drop out rate. Of the 1179 projects submitted for study by the CAISO, 97 have gone commercial, or ~ 8%."[12] The use of a 76% dropout and 8% commercial rate as blanket assumptions of what future generation will develop at Colorado River and Red Bluff Substations are flawed assumptions. Using the assumption that only 8% of the generation projects would be developed and stating that SCE's Proposed Project would be underutilized would lead to under-sizing the project as opposed to right-sizing the project to meet the need of renewable generators in the area.

Comparative analysis of the development of the WOD Upgrade Project to the development of SCE's Tehachapi Renewable Transmission Project (TRTP) shows why the use of blanket assumptions across the board are misleading assumptions. In the case of TRTP, a total of 73 projects that would utilize TRTP sought interconnection at the 220 kV voltage level. Of those 73 projects, 38 projects have withdrawn and 13 projects have already gone commercial with 8 additional projects currently under construction. In

[12] DEIR/DEIS, Appendix 5, Attachment 2, p. 6.

contrast to the overall CAISO dropout rate, SCE has seen only a 52% dropout rate and a 18% commercial rate that will increase to 29%, both of which are significant improvements to the 76% dropout rate and 8% commercial rate included in the DEIR/DEIS. In fact, based on the number of interconnection request in the Tehachapi area, the TRTP will be fully utilized once its construction is completed. This further demonstrates that generation projects develop where transmission line capacity is available. Another example is the Eldorado – Ivanpah Transmission Project (EITP). The EITP had a total of 18 projects with interconnection requests that would require the EITP upgrade. Of those 18 projects, 7 projects have withdrawn and 3 projects have gone commercial with 3 additional projects that are currently under construction. Again, in contrast of the overall CAISO dropout rate, the EITP has a 39% dropout rate and 33% commercial rate. These figures clearly demonstrate that a blanket assumption based on statistics of the entire queue are not applicable across the board and that the rates are expected to improve in areas where transmission projects, such as the WOD Upgrade Project, are developed.

3. The Phased Build Alternative Would Fail to Meet the Project Objectives.

A. <u>The Phased Build Alternative Would Fail to Fulfill the DEIR/DEIS Basic Project Objective 2.</u>

The Phase Build Alternative would not fulfill Basic Objective 2 since this alternative significantly limits the corridor's transfer capability. In evaluating the Phase Build Alternative, the DEIR/DEIS analysis demonstrates that the corridor capacity (actual power flow capability) would be limited to approximately 1,900 MW (per ZGlobal Case 6 Studies). As a result of limiting the corridor capability, the Phased Build Alternative would introduce a barrier to the achievement of State and Federal renewable energy goals and would accelerate the need to again upgrade the WOD corridor. Footnote 2 on Ap. 5-53 of the Appendix 5 in the DEIR/DEIS indicates that since the Phased Build Alternative is a smaller upgrade to the SCE Proposed Project, the renewable resources portfolio might be shifted from Riverside East Renewable Energy Zone to different zones based on RPS Calculator V.5. The need to shift resources from one renewable energy zone to another when performing the Deliverability Analysis is a clear indicator that the use of the 795 ACCR conductor in the Phase Build Alternative creates a barrier to the integration of resources in the Riverside East area. SCE's Proposed Project provides sufficient transfer capability on the WOD Corridor, allowing significantly more renewable generation to be developed and delivered from the Riverside East zone to the LA Basin load centers. In order to meet Basic Objective 2, the WOD Upgrade Project should be designed to maximize the corridor capacity consistent with prudent long-term planning, the State's greenhouse gas reduction goals, and renewable energy goals, while taking into account the overall environmental and cost impacts.

B. The Phased Build Alternative Would Fail to Meet the DEIR/DEIS Basic Project Objective 3.

The inclusion of Basic Project Objective 3 in the DEIR/DEIS suggests that the CPUC and BLM recognize that the WOD corridor is a critical path for renewable development in the Riverside East and Imperial Valley zones. Such identification has been made in several regional studies such as DRECP,[13] PEIS[14] and the CPUC's LTPP,[15] yet the proposed Phased Build Alternative limits the corridor transfer capacity. SCE agrees with the premise that it is important to maximize the availability of remaining space in the corridor to the extent practicable, so future use of the corridor for additional transmission lines is not precluded. However, it is critical to first maximize the capacity of any initial upgrade undertaken within this critical corridor, and do so in a manner that is the least environmentally impactful and reduces costs taken as a whole. Then and only then should project goals ensure that the future use of the corridor is not precluded. In essence, following the Garamendi Principles and ensuring capacity is maximized within the corridor by utilizing the SCE proposed double-bundle 1590 ACSR conductor would eliminate the need to build the next phase, thus reducing environmental impacts and costs and would also defer the need for a new 500 kV or 220 kV transmission lines through the WOD corridor until State policy goals and/or generator development triggers the additional need.

In addition, the Phased Build Alternative was proposed with the understanding that an expansion to the corridor would likely be needed in the near future.[16] The fact that the Phased Build Alternative would be constructed only to have to be torn-down within a few years after construction is not indicative of good transmission planning practices.

Given that it is anticipated that more generation projects will come online during the construction time frame of the initial phase of the Phased Build Alternative, taking the transmission lines in the WOD corridor out of service again for construction of the next phase of upgrades would require significant generation curtailment during construction.

SCE's Proposed Project, would maximize the existing transmission corridor transfer capability to meet California's long-term needs in light of the State's numerous environmental goals. SCE designed the project in a manner to minimize future environmental impact and waste associated with multiple tear-down and rebuild activities.

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[13] Transmission Technical Group Alternative 5.

[14] Final Programmatic Environmental Impact Statement, Vol. 2, pp. 9.4-143. http://www.blm.gov/wo/st/en/prog/energy/geothermal/geothermal_nationwide/Documents/Final_PEIS.html.

[15] Assigned Commissioner's Ruling on Assumptions, Scenarios, and Portfolios of February 27, 2014 in R.13-12-010.

[16] DEIR/DEIS, Cumulative Scenario and Impact, Future 500 kV Transmission line in WOD corridor, p. E-13.

4. The Phased Build Alternative Would Create Unacceptable Outcomes.

A. The Phased Build Alternative Would Inappropriately Reduce and Change SCE's Project Objectives.

In the Proponent's Environmental Assessment (PEA), and as updated in the April 17, 2015 testimony, SCE explained that the purpose of the WOD Upgrade Project was to eliminate the limited transmission transfer capability that currently exists on the transmission lines that connect the Devers Substation to the El Casco, San Bernardino, and Vista Substations in order to:

- Integrate Planned Generation Resources
- Comply with terms of Generator Interconnection Agreements that SCE has entered into with various generators
- Facilitate the FCDS of new electric generation resources being developed in the Blythe and Desert Center Areas
- Facilitate Progress Toward Achieving Renewables Portfolio Standard Goals By Providing Transmission Upgrades to Deliver Renewable Generation in Blythe and Desert Center Areas
- Accommodate increased flows from Path 42
- Enable Distributed Generation (DG) in the Devers area to achieve FCDS
- Support Integration of Small Scale Generation
- Support California's GHG Reduction Program
- Support Goals of the CEC integrated energy policy report
- Support Desert Renewable Energy Conservation Plan
- Support the power flow increase associated with the proposed Delaney-Colorado River 500 kilovolt (kV) project

The DEIR/DEIS dismisses the majority of these objectives, and then further reduces the Proposed Project's purpose and need.

The DEIR/DEIS's Basic Project Objective 1, for example, limits the system deliverability increase to the initial five solar power generation projects totaling 2,200 MW from the CAISO's transition cluster, ignoring the fact that transmission capacity is required for subsequent generation development in the Blythe and Desert Center areas for these resources to achieve the FCDS.

Basic Project Objective 1 would not allow for additional transfer capacity that is reasonably expected to be required and adversely impacts the following West of Devers

Upgrade Project's Purpose and Need:[17]

- Maximize import capability (MIC) out of IID
- Provide for the requested FCDS of seven (7) WDT projects totaling 108 MW seeking interconnection in the Devers and Valley areas
  Provide for deliverability to Distributed Generation located in the Devers area
- Provide additional transfer capability to accommodate the flow increase due to CAISO's approved Delaney–Colorado River 500 kV project. The Delaney-Colorado River project would help to support the deliverability for generation projects located in the Imperial Valley area
- Support reasonably expected generation development beyond the five Transition Cluster generation projects initially identified to trigger the need for the WOD Upgrade Project
- Support California's GHG Reduction Program

B. <u>The Phased Build Alternative Would Trigger Additional Transmission System Upgrades That Were Not Evaluated in the DEIR/DEIS.</u>

As noted in the Consideration of CEQA/NEPA Criteria Section,[18] the Phased Build Alternative relied on a Power Flow Analysis prepared by ZGlobal to determine if the alternative conductor (795 ACCR conductor) would increase the system deliverability by 2,200 MW. The results of Case 6 concluded that the proposed 795 ACCR conductor is in fact NOT technically feasible to increase system deliverability without additional system upgrades. However, these additional upgrades were not considered in the DEIR/DEIS. Case 6 shows that the implementation of a RAS and the installation of 600 MVAr shunt capacitance, consisting of several smaller capacitor banks installed at undisclosed locations, would be required with the use of the 795 ACCR conductor. These facilities are not required as part of SCE's Proposed Project that uses a double-bundle 1590 ACSR conductor to meet the generation interconnection request up to cluster 7. Case 6 modeled the use of 795 ACCR conductor, assumed use of a RAS, added 600 MVAR of reactive support at undisclosed locations, and included approximately 2,628 MW of new not yet existing generation resources at Colorado River and Red Bluff Substations. These additional upgrades need to be evaluated in the DEIR/EIS as they would have environmental, schedule, cost impacts, and may not even be feasible given large size and limited substation land availability. Moreover, the conclusion of Case 6 demonstrates that the use of a 795 ACCR conductor is extremely short-sighted as it does not adequately support expected generation developments at both Colorado River and Red Bluff substations.

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[17] As described in SCE's Proponents Environmental Assessment Chapter 1, and updated in SCE's April 17, 2015 testimony.

[18] DEIR/DEIS, Project Objectives Purpose and Need section, p. Ap.5-48.

C. The Phased Build Alternative Would Adversely Impact the Fundamental Project Purpose of Integrating Planned Generation Resources.

At the time SCE prepared its PEA, the CAISO and SCE generation interconnection studies identified ten (10) generation projects totaling 2,479 MW that required the Proposed Project to obtain FCDS, of which three projects had executed GIAs with SCE for a total of 1,485 MW. Currently, the inclusion of Cluster 8 and modifications to prior queued projects details are provided below, the number of the interconnection requests has increased to sixteen (16) generation projects, totaling 6,072 MW. The WOD Upgrade Project as proposed would be required to provide FCDS for these 16 generation projects.[19] Given the limitations of transfer capability corresponding to the use of 795 ACCR conductor for the Phased Build Alternative, the amount of deliverability is significantly reduced in comparison to SCE's Proposed Project, creating a barrier for renewable development in the Colorado River and Red Bluff substation areas. Thus, the proposed WOD Upgrade Project is a critical project for renewable development in the Riverside East and Imperial Valley. The total designated Renewable Resource Portfolio for Riverside East and Imperial area to meet 33% by 2024 is 4,767 MW. The Phase Build Alternative would become an impediment in achieving and maintaining California's 33% RPS and for the further increase to 50% renewables as required under SB 350.

Details of the changes that affect the generation interconnection information provided in the PEA are:

- Two generation projects, totaling 985 MW (Q193 and Q294), were granted FCDS on a temporary basis via the Interim West of Devers Project. The Interim West of Devers Project will be removed after the completion of the Proposed Project as it would provide no additional capacity or benefits to the system. Therefore, the capacity provided by the WOD Upgrade Project must account for these projects.
- Five generation projects which include the two projects granted FCDS on a temporary basis, totaling 1,859 MW, have executed LGIAs. See Table 1.1
- Two generation projects, totaling 200 MW which have requested FCDS are in GIA negotiation.[20] See Table 1.2
- Two new generation projects (Cluster 7), totaling 400 MW have requested FCDS for their proposed generation facilities. These new generation projects require the WOD Upgrade Project to achieve FCDS. LGIAs for these two projects are currently expected no later than December 2016.[21] See Table 1.3

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[19] Some projects may require additional upgrades beyond the WOD Upgrade Project to achieve the FCDS and would be determined by CAISO.

[20] Q421 has made the first and second required financial posting, Q790 has made the initial financial security posting and the project is currently parked waiting for TP deliverability allocation.

[21] Cluster 7 projects have provided their interconnection financial security in accordance with the CAISO tariff. This posting was due 90 days after the completion of its Phase 1 study, the second posting shall be made 180 calendar days after the issuance of the final Phase 2 interconnection study report.

- Seven new generation projects (Cluster 8), totaling over 3,600 MW have submitted interconnection request where the Interconnection Customers have requested FCDS for their proposed generation facilities. These new generation projects would also rely on the WOD Upgrade Project to support FCDS. See Table 1.4.
- Two generation projects (Q588 and Q797) have withdrawn from the interconnection process.
- Three generation projects, totaling 720 MW (Q17, Q219, and Q138) have executed GIAs, which impact flows and need to be accounted for even though they do not rely on the WOD Upgrade Project for FCDS. See Table 1.5.

The resulting MW capacity of the generation projects requesting interconnection to Colorado River and Red Bluff substations depend on the proposed WOD Upgrade Project to support FCDS increased from 2,479 MW to 6,072 MW, of which 1,859 MW have executed GIAs.

Given the large amount of impending generation projects in CAISO's queue in the Colorado River and Red Bluff Substation areas, permitting for a subsequent expansion of the WOD corridor would need to be initiated prior to completion of construction of the Phased Build Alternative.

Table 1.1

Interconnection Projects Require the WOD Upgrades for FCDS With Executed LGIAs

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
294	Solar PV	Colorado River 220 kV Bus	485	LGIA – Executed In-service date: 12/2016-2/2020
365	Solar Thermal	Red Bluff 220 kV Bus	500	LGIA - Executed In-service date: 12/2020-11/2021
193	Solar PV & Solar Thermal	Colorado River 220 kV Bus	500	LGIA - Executed Already in-service
576	Solar PV	Colorado River 220 kV Bus	224	LGIA – Executed In-service date: 09/2018
643AE	Solar PV	Red Bluff 220 kV Bus	150	LGIA – Executed In-service date: 08/2019

Total	1,859 MW

Table 1.2

Interconnection Projects Require the WOD Upgrades for FCDS Under GIA Negotiation

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
421	Solar PV	Red Bluff 220 kV Bus	50	LGIA - Under Negotiation Propose In-service date: 12/2020
970	Solar PV	Colorado River 220 kV Bus	150	LGIA – Under Negotiation* Propose In-service date: 09/2018
		Total	200 MW	

* LGIA is pending as a result of the IC's election to "Park" the project until the 2016 TP Deliverability Allocation

Table 1.3

Interconnection Projects Require the WOD Upgrades for FCDS in Phase 2 Study

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
1070	Solar PV	Red Bluff 220 kV Bus	250	Study Phase-QC7 Phase II Propose In-service date: 12/2018
1071	Solar PV	Colorado River 220 kV Bus	150	Study Phase-QC7 Phase II Propose In-service date: 5/2019

Total	400 MW

Table 1.4

Interconnection Projects Would Depend on the WOD Upgrades for FCDS in Phase 1 Study

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
1194	Natural Gas	Colorado River 220 kV Bus	600	Study Phase-QC8 Phase I Propose In-service date: 6/2020
1192	Solar PV	Colorado River 220 kV Bus	463	Study Phase-QC8 Phase I Propose In-service date: 12/2020
1198	Solar PV	Colorado River 220 kV Bus	150	Study Phase-QC8 Phase I Propose In-service date: 12/2020
1196	Solar PV	Colorado River 220 kV Bus	400	Study Phase-QC8 Phase I 4/2022
1193	Hydro Pump Storage	Red Bluff 220 kV Bus	1400	Study Phase-QC8 Phase I Propose In-service date: 1/2022
1200	Solar PV	Red Bluff 220 kV Bus	200	Study Phase-QC8 Phase I 12/2018
1197	BAT	Red Bluff 220 kV Bus	400	Study Phase-QC8 Phase I Propose In-service date: 9/2018
Total			3,613 MW	

Table 1.5

Interconnection Projects Would Impact the Flow on the WOD Corridor With Executed GIAs

CAISO Queue #	Technology	Point of Interconnection	Project MW	Comments
17	Combined Cycle	Colorado River 500 kV Bus	520	LGIA – Executed Propose In-service date: 1/2018
138	Wind Turbine	Devers – Vista No.1 220 kV Line	150	LGIA – Executed Propose In-service date: 9/2020
146	Solar PV	Red Bluff 220 kV Bus	150	LGIA – Executed Already in-service
147	Solar PV	Red Bluff 220 kV Bus	400	LGIA – Executed Already in-service
219	Combined Cycle	Colorado River 500 kV Bus	50	LGIA – Executed Propose In-service date: 1/2018
		Total	1,270 MW	

D. The Phased Build Alternative Would Increase the Power Losses Throughout the System.

The use of 795 ACCR conductor would increase the power losses through the WOD corridor and throughout the system compared to the use of double-bundle 1590 ACSR conductor. Given the 795 ACCR conductor resistance is almost four times larger than the double-bundle 1590 ACSR conductor and the power losses are a function of the conductor resistance and the square of the line current, as compared with the double-bundle 1590 ACSR conductor the use of 795 ACCR conductor would increase the system power losses by 62 MW when those lines are operating to their maximum line current

capability. Out of 62 MW losses throughout the system, approximately 30 MW is lost through the WOD corridor.[22]

E. The Phased Build Alternative Would Create Operational Complexity.

The proposed Phased Build Alternative would require the implementation of a RAS to trip generation projects to mitigate instability and thermal overloads along with the installation of a large amount of reactive support. In addition, the implementation of a RAS as a result of limited transfer capability provided by the Phased Build Alternative may trigger the need for generation curtailment to maintain generation tripping up to the CAISO planning standard of 1,400 MW (as defined in the ISO Transmission Planning Standards ISO SPS3).

In contrast, SCE's Proposed Project would provide sufficient transfer capability to meet the immediate and imminent system needs up to cluster 7 (2,459 MW) without any additional upgrades.

F. The Phased Build Alternative Would Adversely Impact Generation Developments.

Given that the Phased Build Alternative would require new engineering and design work, a delay to the completion of the project would occur. SCE anticipates that if the CPUC ultimately selects the Phased Build Alternative, there would be a two-year delay to the project. As discussed in the PEA and the associated data requests, a delay to the completion of the WOD Upgrade Project would adversely impact generation development for the following reasons:

- Delay to the development of renewable resources, since the WOD upgrade is required for generation achieve FCDS.
- Possible impact to ongoing Power Purchase Agreement negotiations
- Potential failure for generators to comply with the terms of existing PPAs.
- Likely present financial adversity to generation projects and threaten the viability of generation development.
- A delay to the WOD Upgrade Project may cause generation projects to postpone their respective commercial operation dates to align with a modified WOD project timeline, potentially adversely impacting such projects' environmental studies, permits, and financial obligations/opportunities.
- Possible delay to increase MIC for IID, consequently, place at risk the financial viability of generation development in the IID area that is dependent upon the MIC increase to meet existing PPA terms and/or the terms of ongoing PPA negotiations.

[22] The actual line losses would vary based on a number of factors including, for example, the amount of energy flowing through the lines, the ambient conditions such as temperature and wind speed, and the duration of various levels of current flow.

Please refer to the generation projects letters provided in SCE's testimony and in SCE's response to data request ALT-17D to better understand the potential impacts to the generation projects in the Eastern area form the possible delay to the WOD Upgrade Project.

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
EXECUTIVE SUMMARY		
ES-2	**Description of the Proposed Project-Connected Actions** A number of solar generation projects appear to depend on the WOD Upgrade Project in order to move to construction and operation, because there currently is inadequate transmission capacity west of Devers Substation. The following generation projects are analyzed as actions connected to the WOD Project: —Palen Solar Electric Generating System II, LLC (CAISO Queue 365) – 500 MW Solar Power Tower —Desert Harvest, LLC (CAISO Queue 643AE) – 150 MW Solar Photovoltaic (PV) —Project 1: Connecting to Blythe-Eagle Mountain 161 kV line (CAISO Queue 421) – 50 MW Solar PV —Project 2: Connecting at Red Bluff Substation 230 kV (CAISO Queue 1070) – 250 MW Solar PV —Project 3: Connecting at Colorado River Substation 230 kV (CAISO Queue 576) – 224 MW Solar PV —Project 4: Connecting at Colorado River Substation 230 kV (CAISO Queue 970) – 150 MW Solar PV —Project 5: Connecting at Colorado River Substation 230 kV (CAISO Queue 1071) – 150 MW Solar PV	Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's analysis of actions connected to the WOD Upgrade Project.
ES-6	**CPUC and BLM Project Objectives** Having taken into consideration the six objectives set forth by SCE above, the CPUC and BLM identified three basic project objectives…	Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's identification of three basic project objectives for the WOD Upgrade Project as opposed to the six project objectives identified by SCE in the PEA for the Proposed Project.
ES-6	**CPUC and BLM Project Objectives** Basic Project Objective 1: to upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW. The first Basic Project Objective reflects the aim to provide increased deliverability of electricity, defined in terms of megawatts (MW), for existing and planned generating facilities that are located far from the utility load centers in the Los Angeles basin. Before the Proposed Project was planned, the transmission transfer capability of the WOD 220 kV corridor was limited to approximately 550 MW. Since then, several generators with plans to be online before the Proposed Project's estimated completion date in 2020 requested interconnection to the system. In order to accommodate and deliver the initial group of 5 solar power generation projects that was planned, totaling 2,200 MW (CAISO, 2010), the minimum total capability that would need to be achieved by the Proposed Project or any alternative is 2,750 MW. Accordingly, the first Basic Project Objective is to increase deliverability by at least 2,200 MW.	Please see SCE's accompanying cover letter and Attachment A for a detailed description of SCE's argument that Basic Project Objective 1 does not sufficiently meet the need for the WOD Upgrade Project.

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
ES-6	**CPUC and BLM Project Objectives** Basic Project Objective 2: to support achievement of State and federal renewable energy goals. The second Basic Project Objective is directly related to the first, because the projects that plan to rely on the Proposed Project for delivering electricity to the Los Angeles basin are primarily solar generation projects. Therefore, an increase in the capacity of the WOD transmission lines would directly improve the ability for numerous renewable generation projects to interconnect. Aside from the resources imported via transmission lines from outside of the SCE territory, all of the interconnecting projects are solar powered, as described in SCE's Application and PEA Sections 1.1 and 1.2. California's renewable energy goals are defined on the CPUC's website (CPUC, 2015): Established in 2002 under Senate Bill 1078, accelerated in 2006 under Senate Bill 107 and expanded in 2011 under Senate Bill 2, California's Renewables Portfolio Standard (RPS) is one of the most ambitious renewable energy standards in the country. The RPS program requires investor-owned utilities (IOUs), electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33% of total procurement by 2020. The CPUC states that California's three large utilities collectively served 22.7% of their 2013 retail electricity sales with renewable power. The federal government also has prioritized the development of renewable energy, but has not set specific development targets for the country as a whole.	Please see SCE's accompanying cover letter and Attachment A regarding SCE's concerns about Basic Project Objective 2.
ES-10 through ES-11	**CEQA and NEPA Requirements for Alternatives** Under CEQA, alternatives to the Proposed Project are identified and evaluated in accordance with CEQA Guidelines. CEQA Guidelines (Section 15126(a)) state: An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.	Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting the conclusion that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project.
ES-15	**Phased Build Alternative** Under the heading phased build alternative, The high-performance conductors would maximize power transfer and avoid structurally overloading the existing towers. In this alternative, the existing 66 kV sub-transmission system would not be affected and the replacement 66 kV line that would move to Iowa Street under the Proposed Project would not be required.	Based on preliminary review of the Phased Build Alternative, SCE cannot confirm the 66 kV line would not be affected as there is not sufficient space to safely string conductor without a shoo-fly or multiple line outages. Please see SCE's accompanying cover letter for additional information related to these construction constraints.
ES-16	**Phased Build Alternative** Footnote 3: The Phased Build Alternative would have capacity for all the generation included in the CAISO 2024 Reliability Base Case (see EIR/EIS Appendix 5 (Alternatives Screening Report), Attachment 2, pages 5-6 and Table A4). This scenario includes 3,754 MW of Total Generation On-line and 6,901 MW of Total Generation Capacity, as well as the power flow on the system resulting from import of 1,400 MW from the Imperial Irrigation District into the Los Angeles Basin.	Please see SCE's accompanying cover letter and Attachment A for reasons as to why the CAISO 2024 Reliability Base Case should not be used in considering alternatives to the Proposed Project.

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
ES-16	**Phased Build Alternative- Description** **Retain existing double-circuit towers.** The existing double-circuit towers would be retained. Prior to reconductoring approximately 20% of the existing structures would be strengthened and their heights increased.	Appendix 5, attachment 3 confirms SCE's original response in Data Request 10 stating that the single conductor Drake 795 ACCR conductor would require a 30% increase in strength or height for the structures. Further, structure height increases would require SCE to evaluate the means and methods for performing the work. For example, existing tower foundations may not support the increase in structure height, thus, requiring new foundations and possibly new towers to be constructed for this alternative. Please make the following revision to the DEIR language: Prior to reconductoring, approximately ~~20%~~ 30% of the existing structures would likely be replaced to provide increased strength~~ened~~ and/or ~~their~~ height~~s increased~~.
ES-16	**Phased Build Alternative- Description** **Allow for future capacity expansion within the existing corridor with several optional future phases**. These phases would be implemented as generation projects become certain and capacity is clearly required. Because the Phased Build Alternative would accommodate projects now defined in the CAISO's 2024 Reliability Base Case, it may be 10 years before additional upgrades are needed. The future phases could include: –Reconductoring the newly constructed 220 kV structures with higher capacity conductors; –Replacing the retained 220 kV structures with new, stronger 220 kV structures in order to carry heavier, higher capacity conductors; –Install a single- or double-circuit 500 kV or 220 kV line in the vacant space remaining in the ROW.	Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's characterization of optional future phases to the WOD Upgrade Project.
ES-16	**Phased Build Alternative- Description** **Install high-capacity conductors on all four circuits.** Both the new and existing 220 kV double-circuit towers would have the "795 Drake" Aluminum Conductor Composite Reinforced (ACCR) installed.	This bullet point referencing installation of the high capacity conductor in the executive summary conflicts with the description for conductor installation as seen in Appendix 5, specifically in Segment 1 (Etiwanda-San Bernardino and San Bernardino-Vista). For clarity, please make the following revision: **Install high-capacity conductors on all four circuits.** Both the new and existing 220 kV double-circuit towers would have the "795 Drake" Aluminum Conductor Composite Reinforced (ACCR) installed with the exception of Segment 1, where only two of the existing four circuits would use the high capacity conductor.
ES-16	**Rationale for Full Analysis.** The Phased Build Alternative is retained for analysis because it would reduce the environmental impacts of the Proposed Project by greatly reducing the amount of construction dis-turbance in comparison with the Proposed Project.	Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting the conclusion that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project.
ES-67	Also, less power would flow through the transmission lines in this alterna-tive compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference.	Because electrical interference is based on system voltage as opposed to power flow, the alterative would not have a difference in potential impacts as compared to the Proposed Project. Please delete the following from the DEIR: ~~Also, less power would flow through the transmission lines in this alterna-tive compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference.~~

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
ES-71	Under heading ES.6.2 Environmentally Superior/Preferred Alternative, and the Phased Build Alternative, The Phased Build Alternative is preferred over the Proposed Project because it would reduce construction impacts by eliminating the need to remove and reconstruct the existing 220 kV structures and relocate the existing 66 kV subtransmission lines.	The sentence implies that all of the 220 kV structures would not need to be removed and reconstructed, when in fact, the Phased Build Alternative calls for the removal and reconstruction of the single-circuit structures. As such, the following revision is suggested: The Phased Build Alternative is preferred over the Proposed Project because it would reduce construction impacts by eliminating the need to remove and reconstruct the double circuit ~~existing~~ 220 kV structures and relocate the existing 66 kV subtransmission lines.
ES-71	The Phased Build Alternative would not require implementation of the Iowa Street 66 kV Underground Alternative, since the existing 66 kV system would not be affected.	Based on SCE's preliminary review of the Phased Build Alternative, SCE cannot confirm the 66 kV line would not be affected as there is not sufficient space for safely stringing conductor without a shoo-fly or multiple line outages. Please see SCE's accompanying cover letter for additional information related to construction constraints.
INTRODUCTION		
A-3	Footnote 1- Pursuant to 25 U.S.C. §323.	Pursuant to 25 U.S.C. §~~323~~ 81.
A-5	**A.2.1.3 Review of SCE's Purpose and Need** As a result, SCE proposes to remove all existing 220 kV structures and replace them with larger capacity 220 kV structures.	As described in the Proposed Project, SCE proposes the reuse of some of the existing double-circuit 220 kV structures and as such recommends the following edit: As a result, SCE proposes to remove ~~all~~ a majority of the existing 220 kV structures and replace them with larger capacity 220 kV structures.
A-11	**CPUC and BLM Project Objectives** Having taken into consideration the objectives and purpose and need set forth by SCE (Sections A.2.1.1 and A.2.1.2), the CPUC and BLM identified 3 basic project objectives. These objectives are used by the CPUC and BLM to evaluate alternatives and to define a range of reasonable alternatives to the Proposed Project. The evaluation of alternatives in this EIR/EIS provides information on whether each alternative could feasibly accomplish most or all of these basic objectives.	Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's identification of three basic project objectives for the WOD Upgrade Project as opposed to the six project objectives identified by SCE in the PEA for the Proposed Project.

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
A-11	**A.2.3 CPUC and BLM Project Objectives** Basic Project Objective 1: To upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW. The first Basic Project Objective reflects the aim to provide increased deliverability of electricity, defined in terms of MW, for existing and planned generating facilities that are located far from the utility load centers in the Los Angeles basin. Before the Proposed Project was planned, the transmission transfer capability of the WOD 220 kV corridor was limited to approximately 550 MW. Since then, several generators with plans to be online before the Proposed Project's estimated completion date in 2020 requested interconnection to the system. In order to accommodate and deliver the initial group of 5 solar power generation projects that was planned, totaling 2,200 MW (CAISO, 2010), the minimum total capability that would need to be achieved by the Proposed Project or an alternative is 2,750 MW. Accordingly, the first Basic Project Objective is to increase deliverability by at least 2,200 MW. The initial 5 projects are described in Section A.2.1.4.1 above, Table A-3, and in 2010 they were the following: —NextEra Desert Center Blythe, LLC (Genesis McCoy): 500 MW —NextEra Blythe Solar Energy Center, LLC: 1,000 MW —Palen SEGS II, LLC (Palen) subsidiary of BrightSource Energy: 500 MW —Project interconnecting at Blythe–Eagle Mountain 161 kV line: 50 MW —Project interconnecting at Colorado River 220 kV: 150 MW The EIR/EIS team completed independent power flow modeling to evaluate the capacity of the current transmission system, the Proposed Project, and several sensitivities. The report of these studies is presented as Attachment 2 to EIR/EIS Appendix 5 (Alternatives Screening Report). The CAISO's 2024 Reliability Base Case, from the CAISO's 2013/2014 transmission planning process (one of the base cases used in the alternative analysis) represents the view from the CAISO's and SCE's perspective (a collaborative effort) of the level of generation deemed viable (based on a number of criteria) and to be in place and operational in 2024. The generation level from all renewable and conventional resources within the Eastern Bulk system for the region under analysis is: —Total Generation On-line: 3,754 MW —Total Generation Capacity: 6,901 MW The power flow modeling for the WOD Upgrade Project, and potential alternatives that would need to meet this objective, uses the 2024 Reliability Base Case	Please see SCE's accompanying cover letter and Attachment A for a detailed description of SCE's argument that Basic Project Objective 1 does not sufficiently meet the need for the WOD Upgrade Project and the CAISO 2024 Reliability Base Case should not be used in considering alternatives to the Proposed Project.
A-12	Basic Project Objective 2: to support achievement of State and federal renewable energy goals. The second Basic Project Objective is directly related to the first, because the projects that plan to rely on the Proposed Project for delivering electricity to the Los Angeles basin are primarily solar generation projects. Therefore, an increase in the capacity of the WOD transmission lines would directly improve the ability for numerous renewable generation projects to interconnect. Aside from the resources imported via transmission lines from outside of the SCE territory, all of the interconnecting projects are solar powered, as described in SCE's Application and PEA Sections 1.1 and 1.2. See also Section A.2.1.4.1 (above).	Please see SCE's accompanying cover letter and Attachment A for SCE's concerns about Basic Project Objective 2.
A-13	**A.3 Definition of Connected Actions and Related Projects** Table A-6. Project Analysis Determinations	Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's analysis of actions connected to the WOD Upgrade Project.

<table>
<tr><th>PAGE</th><th>DEIR/DEIS LANGUAGE</th><th>SOUTHERN CALIFORNIA EDISON'S COMMENT</th></tr>
<tr><td>A-16</td><td>SCE would apply to BIA for the grant of ROW across the new 3-mile alignment across the Morongo tribal land and for the replacement and upgrade aspects of the transmission line.</td><td>The BIA will not be approving SCE's construction in the tribal trust lands. Instead, BIA will consider that construction as a reasonably foreseeable impact in determining whether or not to approve the ROW grant. Please make the following revisions:

SCE would apply to BIA for the grant of ROW across the new 3-mile alignment across the Morongo tribal land. ~~and for the replacement and upgrade aspects of the transmission line.~~</td></tr>
<tr><td>A-16</td><td>No local discretionary (e.g., use) permits are required, since the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of SCE facilities in California. SCE would still have to obtain all ministerial building and encroachment permits from local jurisdictions, and the CPUC's General Order 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions. The CPUC's authority does not preempt special districts, such as the South Coast Air Quality Management District, or other State agencies or the federal government.</td><td>The CPUC's General Order 131-D does not state that SCE must comply with local building, design and safety standards as indicated in the DEIR/DEIS. General Order 131-D, Section XIV, Part B explains that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations or electric facilities constructed by public utilities subject to the Commission's Jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters. For accuracy, please make the following revision.

No local discretionary (e.g., use) permits are required, since the CPUC has preemptive jurisdiction over the construction, maintenance, and operation of SCE facilities in California. <u>However, the CPUC's General Order 131-D requires SCE to consult with local agencies in locating its project.</u> ~~SCE would still have to obtain all ministerial building and encroachment permits from local jurisdictions, and the CPUC's General Order 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions.~~ The CPUC's authority does not preempt special districts, such as the South Coast Air Quality Management District, or other State agencies or the federal government.</td></tr>
<tr><td>A-17</td><td>Table A-7 Permits that may be Required for the West of Devers Upgrade Project</td><td>Please add to the table the following under the Tribal Lands header.

<table><tr><th>Agency</th><th>Jurisdiction</th><th>Requirements</th></tr><tr><td><u>U.S. Environmental Protection Agency</u></td><td><u>Tribal Lands</u></td><td><u>Clean Water Act Section 402, General Permit for Storm Water Discharges Associated with Construction Activities On Tribal Land</u></td></tr></table></td></tr>
</table>

<table>
<tr><th>PAGE</th><th>DEIR/DEIS LANGUAGE</th><th>SOUTHERN CALIFORNIA EDISON'S COMMENT</th></tr>
<tr><td>A-17</td><td>Table A-7 Permits that may be Required for the West of Devers Upgrade Project</td><td>In addition to FAA 7460-1, SCE will also apply for FAA 7460-2 Notice of Actual Construction or Alteration which is required 5 days after reaching the maximum height. Please include the 7460-2 in the requirements section added below:
<table>
<tr><th>Agency</th><th>Jurisdiction</th><th>Requirements</th></tr>
<tr><td>Federal Aviation Administration (FAA)</td><td>Air safety near San Bernardino International Airport and Banning Municipal Airport</td><td>• Form 7460–1, Notice of Proposed Construction or Alteration; Permit and Notice to Airmen
• <u>Form 7460-2 Notice of Actual Construction or Alteration</u></td></tr>
</table></td></tr>
<tr><td>A-17</td><td>Table A-7 Permits that may be Required for the West of Devers Upgrade Project:</td><td>Please remove the reference to Section 401 and update the description of the 404 permit.
<table>
<tr><th>Agency</th><th>Jurisdiction</th><th>Requirements</th></tr>
<tr><td>U.S. Army Corps of Engineers (USACE), Los Angeles District</td><td>Construction or operation of facilities which may result in any discharge into U.S. navigable waters</td><td>• Section ~~401~~/404 Permit – ~~streambed alteration/crossing~~ <u>discharge of fill material into jurisdictional waters</u></td></tr>
</table></td></tr>
<tr><td>A-17</td><td>Under State or Regional Agencies:
Regional Water Quality Control Board (RWQCB) – Colorado River Office (Region 7) and Santa Ana Office (Region 8)"</td><td>Please remove the "Clean Water Act 401 certification" from the RWQCB section and add it under a new Section for State Water Resources Control Board (SWRCB).
<table>
<tr><th colspan="3">State or Regional Agencies</th></tr>
<tr><td>Regional Water Quality Control Board (RWQCB) – Colorado River Office (Region 7) and Santa Ana Office (Region 8)</td><td>Protection of surface waters under the Clean Water Act</td><td>• ~~Clean Water Act Section 401 certification~~
• Clean Water Act Section 402, General Permit for Storm Water Discharges Associated with Construction Activities</td></tr>
<tr><td><u>State Water Resources Control Board (SWRCB)</u></td><td><u>Protection of surface waters under the Clean Water Act</u></td><td>• <u>Clean Water Act Section 401 certification</u></td></tr>
</table></td></tr>
</table>

<table>
<tr><th>PAGE</th><th>DEIR/DEIS LANGUAGE</th><th>SOUTHERN CALIFORNIA EDISON'S COMMENT</th></tr>
<tr><td>A-17</td><td>South Coast Air Basin and Coachella Valley</td><td>Please see addition to South Coast Air Basin and Coachella Valley added in "and portion of the Salton Sea Air Basin".
<table>
<tr><th colspan="3">State or Regional Agencies</th></tr>
<tr><td>South Coast Air Quality Management District (SCAQMD)</td><td>South Coast Air Basin and Coachella Valley <u>and portion of the Salton Sea Air Basin</u></td><td>• Fugitive Dust Control Plan</td></tr>
</table></td></tr>
<tr><td colspan="3">DESCRIPTION OF THE PROPOSED PROJECT</td></tr>
<tr><td>None</td><td></td><td>As explained to the CPUC/BLM, SCE proceeded with additional engineering for the Proposed Project during the agencies preparation of the DEIR/DEIS in order to meet the in-service date for the West of Devers Upgrade Project. The modifications to the Proposed Project description as a result of this additional engineering analysis would generally reduce impacts described in the DEIR/DEIS.</td></tr>
<tr><td>B-1</td><td>Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;</td><td>As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations:

<s>Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;</s></td></tr>
<tr><td>B-1</td><td>The existing WOD corridor traverses a combination of residential, commercial, agricultural, recreation, and open space land uses. The existing structures and existing conductor would be removed and replaced within the existing ROW, except for an approximately 3-mile portion of Segment 5 on the Morongo Band of Mission Indians (Morongo) Reservation that would be in new ROW.</td><td>SCE suggests including the word "primarily" as indicated below in order to be consistent with verbiage elsewhere in the DEIR/DEIS:

The existing WOD corridor traverses a combination of residential, commercial, agricultural, recreation, and open space land uses. The existing structures and existing conductor would be removed and replaced <u>primarily</u> within the existing ROW, except for an approximately 3-mile portion of Segment 5 on the Morongo Band of Mission Indians (Morongo) Reservation that would be in new ROW.</td></tr>
<tr><td>B-1</td><td>Originally, the upgrades west of Devers Substation were planned as part of the Devers–Palo Verde No.2 Project (DPV2). Proposed by SCE in 2005, DPV2 involved construction of a new 230-mile 500 kV line from the Harquahala Substation in Arizona to the Devers Substation in North Palm Springs, California, as well as upgrading an additional 50 miles of 220 kV transmission lines west of Devers Substation. The original WOD proposed upgrades included replacing two existing single-circuit 220 kV lines with a new double-circuit 220 kV line and reconductoring a third 220 kV line between Devers Substation and San Bernar-dino Junction; reconductoring of 4.8 miles of 220 kV transmission line between San Bernardino Junction and Vista Substation; and reconductoring of 3.4 miles of 220 kV transmission line between San Bernar-dino Junction and San Bernardino Substation located in San Bernardino County, California.</td><td>SCE recommends the following explanation clarifying the original need for the West of Devers Upgrade Project that was considered in 2005 as compared to the need for today's Proposed Project, which should be included in this section. Please revise to add the following:

<u>The reason for the scope difference between the original WOD project as part of the Devers – Palo Verde No.2 and the current Proposed WOD upgrade is that the original WOD project scope was limited to 1200MW flow increase associated with the Devers – Palo Verde No.2 project, while the scope of the Proposed Project is to maximize the transfer capability on the WOD corridor to accommodate the renewable resources development in Riverside East.</u></td></tr>
</table>

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
B-1	Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations ~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~
B-1	Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. ~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~
B-2	FN1- However, the replacement and upgrade project is subject to BIA approval.	The BIA will not be approving SCE's construction in the tribal trust lands. Instead, BIA will consider that construction as a reasonably foreseeable impact in determining whether or not to approve the ROW grant. Please remove the following footnote: ~~However, the replacement and upgrade project is subject to BIA approval~~.
B-2	Under the heading of " The main differences…, the 1st bullet states: Replacement Structures Due to Heavier Conductor: SCE's proposes to use heavier (higher capacity) conductors. The existing 220 kV structures would not support the greater weight and SCE is proposing to remove and replace all structures in the corridors.	For clarification please change the word "heavier" to "SCE's standard": Replacement Structures Due to Heavier Conductor: SCEproposes to use ~~heavier~~ SCE's standard (higher capacity) conductors. The existing 220 kV structures would not support the greater weight and SCE is proposing to remove and replace all structures in the corridors.
B-4	Under the heading Segment 1: San Bernardino (MP SB0 to MP SB3.5), the last sentence on the second paragraph states : Transmission line work within Segment 1 would include removal of approximately 45 220 kV LSTs, installation of approximately 49 220 kV structures, and modifications to 1 existing LST within the existing ROW.	As a result of additional engineering analysis, the following changes have been identified: Transmission line work within Segment 1 would include removal of approximately 45 220 kV LSTs, installation of approximately ~~49~~ 46 220 kV structures, and modifications to 1 existing LST within the existing ROW.
B-4	Under the heading Segment 2: Colton, Grand Terrace and Loma Linda (MP 0 to MP 5.2) the last sentence on the second paragraph states : Transmission work within Section 2 would include removal of approximately 25 double-circuit LSTs, installation of approximately 28 structures, and modifications to 4 existing structures.	As a result of additional engineering analysis, the following changes have been identified: Transmission work within Section 2 would include removal of approximately ~~25~~ 23 double-circuit LSTs, installation of approximately ~~28~~ 25 structures, and modifications to ~~4~~ 6 existing structures.
B-5	Under the heading Segment 3: San Timoteo Canyon (MP 5.2 to MP 15.2) the last sentence on the second paragraph states : Project work within Segment 3 would include removal of approximately 118 LSTs, installation of approximately 104 structures, and modifications to 4 existing structures.	As a result of additional engineering analysis, the following changes have been identified: Project work within Segment 3 would include removal of approximately 118 LSTs, installation of approximately ~~104~~ 102 structures, and modifications to 4 existing structures.

<table>
<tr><th>PAGE</th><th>DEIR/DEIS LANGUAGE</th><th>SOUTHERN CALIFORNIA EDISON'S COMMENT</th></tr>
<tr><td>B-5</td><td>Under the heading Segment 4: Beaumont and Banning (MP 15.2 to MP 27.4) the last sentence on page B-5 states :
Project work within Segment 4 would include removal of 161</td><td>As a result of additional engineering analysis, the following changes have been identified:
Project work within Segment 4 would include removal of ~~161~~ 160</td></tr>
<tr><td>B-6</td><td>Under the heading Segment 4: Beaumont and Banning (MP 15.2 to MP 27.4) the first sentence on page B-6 states:
structures, installation of approximately 112 structures, and modifications to 5 existing structures.</td><td>As a result of additional engineering analysis, the following changes have been identified:
structures, installation of approximately ~~112~~ 111 structures, and modifications to ~~5~~ 6 existing structures.</td></tr>
<tr><td>B-6</td><td>Under the heading Segment 6: Whitewater and Devers (MP 36.9 to MP 45) the last sentence on the second paragraph states:
Project work within Segment 6 includes removal of 112 structures, installation of 79 structures, and modifications to 5 exist-ing structures.</td><td>As a result of additional engineering analysis, the following changes have been identified:
Project work within Segment 6 includes removal of ~~112~~ 117 structures, and installation of ~~79~~ 85 structures, ~~and modifications to 5 exist-ing structures.~~</td></tr>
<tr><td>B-7</td><td>Table B-1. Typical Transmission Structure Dimensions
Type of Structure | Proposed Number of Structures | Approximate Height Above Ground | Approximate Pole Diameter | Approximate Auger Hole Depth | Approximate Auger Diameter
LST | 394 | 110–189 feet | N/A | 15–50 feet | 3.0–7.0 feet at each leg
TSP | 76 | 110–200 feet | 3.0–7.0 feet | 30–60 feet | 5–12 feet</td><td>As a result of additional engineering analysis, the following changes have been identified:
Please see attached file "WODUP Tables B-1 and B-2 Rev.xlsx and updated Table B-1 below:
Table B-1. Typical Transmission Structure Dimensions
Type of Structure | Proposed Number of Structures | Approximate Height Above Ground | Approximate Pole Diameter | Approximate Auger Hole Depth | Approximate Auger Diameter
LST | ~~394~~384 | 110–193~~189~~ feet | N/A | 15–50 feet | 3.0–7.0 feet at each leg
TSP | ~~76~~83 | 110–198~~200~~ feet | 3.0–10.0 ~~7.0~~ feet | 30–60 feet | 5–14~~12~~ feet</td></tr>
<tr><td>B-7</td><td>Under Table B-1. Typical Transmission Structure Dimensions states:
Source: SCE, 2013.</td><td>Please see revised text:
Source: SCE, ~~2013~~ 2015.</td></tr>
<tr><td>B-7</td><td>Footnote 1 under Table B-1. Typical Transmission Structure Dimensions states:
1 - Includes 38 TSPs in Segment 5 per agreement between SCE and Morongo.</td><td>As a result of additional engineering analysis, the following changes have been identified:
1 - Includes ~~38~~ 34 TSPs in Segment 5 per agreement between SCE and Morongo.</td></tr>
<tr><td>B-7</td><td>The second sentence on the first paragraph under Table B-1. Typical Transmission Structure Dimensions states:
As part of the entire Proposed Project, approximately 5 TSPs, 153 H-frame structures, 408 LSTs, 29 three-pole structures, and approximately 562 miles of con-ductor would be removed, as shown in Table B-2.</td><td>As a result of additional engineering analysis, the following changes have been identified:
As part of the entire Proposed Project, approximately 5 TSPs, 153 H-frame structures, ~~408~~ 413 LSTs, 29 three-pole structures, and approximately 562 miles of con-ductor would be removed, as shown in Table B-2.</td></tr>
</table>

<table>
<tr><th>PAGE</th><th>DEIR/DEIS LANGUAGE</th><th>SOUTHERN CALIFORNIA EDISON'S COMMENT</th></tr>
<tr><td>B-7</td><td>Table B-2. Transmission 220 kV Removal and Installation Per Segment
<table>
<tr><th>Segment 1</th><th>Segment 2</th><th>Segment 3</th><th>Segment 4</th><th></th><th>Segment 5</th><th>Segment 6</th><th>Total</th></tr>
<tr><td colspan="8">Proposed Project Removals</td></tr>
<tr><td>Double-circuit lattice steel tower</td><td>44</td><td>25</td><td>33</td><td>37</td><td>33</td><td>28</td><td>200</td></tr>
<tr><td>Single-circuit lattice steel tower</td><td>1</td><td>0</td><td>85</td><td>61</td><td>34</td><td>30</td><td>211</td></tr>
<tr><td>H-frame</td><td>0</td><td>0</td><td>0</td><td>53</td><td>55</td><td>45</td><td>153</td></tr>
<tr><td>Three-pole structure</td><td>0</td><td>0</td><td>0</td><td>10</td><td>10</td><td>9</td><td>29</td></tr>
<tr><td>Single-circuit TSP</td><td>0</td><td>0</td><td>0</td><td>0</td><td>5</td><td>0</td><td>5</td></tr>
<tr><td>Conductor (miles)</td><td>59</td><td>31</td><td>120</td><td>148</td><td>108</td><td>96</td><td>562</td></tr>
<tr><td>OHGW (miles)</td><td>7</td><td>5</td><td>50</td><td>63</td><td>45</td><td>40</td><td>210</td></tr>
<tr><td colspan="8">Proposed Project Installation</td></tr>
<tr><td>Double-circuit lattice steel tower</td><td>46</td><td>19</td><td>94</td><td>98</td><td>60</td><td>77</td><td>394</td></tr>
<tr><td>Double-circuit tubular steel pole</td><td>1</td><td>7</td><td>10</td><td>14</td><td>38</td><td>2</td><td>72</td></tr>
<tr><td>Single-circuit tubular steel pole</td><td>2</td><td>2</td><td>0</td><td>0</td><td>0</td><td>0</td><td>4</td></tr>
<tr><td>Circuit length (miles)</td><td>14</td><td>10</td><td>40</td><td>48</td><td>36</td><td>32</td><td>180</td></tr>
<tr><td>Conductor (miles)</td><td>87</td><td>67</td><td>264</td><td>320</td><td>250</td><td>211</td><td>1,199</td></tr>
<tr><td>OPGW (miles)</td><td>7</td><td>6</td><td>22</td><td>26</td><td>20</td><td>18</td><td>99</td></tr>
<tr><td colspan="8">Proposed Project Existing Structures To Be Modified</td></tr>
<tr><td>Double-circuit lattice steel tower</td><td>1</td><td>4</td><td>4</td><td>5</td><td>0</td><td>5</td><td>19</td></tr>
</table></td><td>As a result of additional engineering analysis, the following changes have been identified.
Please see attached file "WODUP Tables B-1 and B-2 Rev.xlsx and updated Table B-1.</td></tr>
<tr><td>B-7</td><td>Under Table B-2. Transmission 220 kV Removal and Installation Per Segment states:
Source: SCE, 2013.</td><td>Please see revised text.
Source: SCE, ~~2013~~ 2015.</td></tr>
</table>

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
B-8	Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee sub- stations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. ~~Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee sub- stations to accommodate the 66 kV subtransmission line relocations. The required substation modifications would not result in any change to the height or width of the existing substation facilities.~~
B-8	Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee sub-stations to accommodate the 66 kV subtransmission line relocations. The required substation modifica-tions would not result in any change to the height or width of the existing substation facilities.	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. ~~Additionally, SCE would replace the circuit breakers and foundations at the Timoteo and Tennessee sub-stations to accommodate the 66 kV subtransmission line relocations. The required substation modifica-tions would not result in any change to the height or width of the existing substation facilities.~~
B-10	B.2.2.6 Timoteo Substation Timoteo Substation is an existing 66/12 kV substation located near the intersection of Redlands Boule- vard and Mountain View Avenue in the City of Loma Linda, as shown on Figure B-11g. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER. The 66 kV switchrack has six positions. The following work would be carried out at two positions: - Replacement of two oil-type 66 kV CBs with new SF6 gas-type CBs; - Installation of 12 surge arresters; and - Replacement of existing equipment foundations to accommodate new equipment and reconnect to existing conduit and grounding.	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. ~~B.2.2.6 Timoteo Substation~~ ~~Timoteo Substation is an existing 66/12 kV substation located near the intersection of Redlands Boule- vard and Mountain View Avenue in the City of Loma Linda, as shown on Figure B-11g. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.~~ ~~The 66 kV switchrack has six positions. The following work would be carried out at two positions:~~ ~~- Replacement of two oil-type 66 kV CBs with new SF6 gas-type CBs;~~ ~~- Installation of 12 surge arresters; and~~ ~~- Replacement of existing equipment foundations to accommodate new equipment and reconnect to existing conduit and grounding.~~
B-10	B.2.2.7 Tennessee Substation Tennessee Substation is an existing 66/12 kV substation located at Avenue E and 18th Street in the City of Yucaipa, as shown on Figure B-11h. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER. The 66 kV switchrack has six positions. The following work would be conducted at one position: □ Replacement of one oil-type 66 kV CB with a new SF6 gas-type CB; □ Installation of six surge arresters; and □ Replacement of existing equipment foundations to accommodate new equipment and reconnect to existing conduit and grounding.	Please remove the following references to the Tennessee Substation. ~~B.2.2.7 Tennessee Substation~~ ~~Tennessee Substation is an existing 66/12 kV substation located at Avenue E and 18th Street in the City of Yucaipa, as shown on Figure B-11h. The Proposed Project would modify 66 kV equipment within the existing switchrack and protective relay equipment inside the MEER.~~ ~~The 66 kV switchrack has six positions. The following work would be conducted at one position:~~ ~~□ Replacement of one oil-type 66 kV CB with a new SF6 gas-type CB;~~ ~~□ Installation of six surge arresters; and~~ ~~□ Replacement of existing equipment foundations to accommodate new equipment and reconnect to existing conduit and grounding.~~

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
B.11	**B.2.2.8 Substation Lighting** Approximately 10 new and 30 replacement lights would be installed on the switchracks for upgraded line positions at Devers, El Casco, Vista, San Bernardino, Timoteo, and Tennessee Substations.	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. **B.2.2.8 Substation Lighting** Approximately 10 new and 30 replacement lights would be installed on the switchracks for upgraded line positions at Devers, El Casco, Vista, and San Bernardino~~, Timoteo, and Tennessee~~ Substations.
B-15	Dental 12 kV Distribution Circuit relocation would be approximately 1.0 mile in length and would reconnect in a new underground system, which would originate on the north side of mission Road and east of Mountain View Avenue and extend southeasterly for approximately 1.0 mile to California Street. The 12 kV underground system would then extend south along California Street for approximately 500 feet to Barton Road. At this location, the 12 kV circuit would transition from underground to overhead via a distribution riser pole and reconnect to the existing Dental 12 kV circuit.	As a result of additional engineering analysis, the following changes have been identified: Dental 12 kV Distribution Circuit relocation would be approximately 1.0 mile in length and would reconnect in a new underground system, which would originate on the north side of mission Road and east of Mountain View Avenue and extend southeasterly for approximately 1.0 mile to California Street. The 12 kV underground system would then extend south along California Street for approximately 500 feet to Barton Road. At this location, the 12 kV circuit would transition from underground to overhead via a distribution riser pole and reconnect to the existing Dental 12 kV circuit. Included on the Dental is a reconductor of approximately 0.3mi of 3W 1/0ACSR and a new overhead three phase bank for the removal of an existing overhead three phase bank in the transmission corridor. This reconductor may require approximately four distribution pole replacements.
B-15	Intern 12 kV Distribution Circuit relocation would be approximately 2.0 miles in length and would be relocated in the same new underground system described for the Dental 12 kV circuit. The Intern 12 kV circuit would transition from underground to overhead via a distribution riser pole at Barton Road, then continue west from California Street for 0.5 miles to Mayberry Street as underbuild (installing distribution circuit facilities under the 66 kV subtransmission circuit on the same structure) on an existing subtransmission pole. The new underbuild may require approximately 11 subtransmission structures be replaced.	As a result of additional engineering analysis, the following changes have been identified: Intern 12 kV Distribution Circuit relocation would be approximately 2.0 miles in length and would be relocated in the same new underground system described for the Dental 12 kV circuit. The Intern 12 kV circuit would transition from underground to overhead via a distribution riser pole at Barton Road, then continue west from California Street for 0.5 miles to Mayberry Street as underbuild (installing distribution circuit facilities under the 66 kV subtransmission circuit on the same structure) on an existing subtransmission pole. The new underbuild may require approximately ~~11~~ one subtransmission structures be replaced and one new subtransmission structure.
B-15 through 16	2. Connect the existing Devers-Valley OPGW to the MEER in Banning Substation. □□Install approximately 690 feet of fiber optic cable in a new underground conduit between the existing Devers-Valley No. 2 500 kV structure M21-T3 to an existing distribution pole on Coyote Trail approximately 3,200 feet west of Old Idyllwild Road. From this existing distribution pole on Coyote Trail, install approximately 4,100 feet of new fiber optic cable east on existing distribution poles (combination of public and private lands) to a location 350 feet south of Old Idyllwild Road. From this location, install approximately 470 feet of fiber optic cable in new underground conduit to cross under the existing Devers-Valley 500 kV ROW to an existing distribution pole. From this location, install fiber optic cable overhead on a combination of distribution and subtransmission poles for approximately 2,100 feet to Wesley Street. The fiber optic cable would then extend east along Wesley Street for approximately 1,300 feet to existing SCE ROW and then north for approxi-mately 3,300 feet to East Lincoln Street. It would transition underground at this location and install approximately 230 feet of fiber optic cable and new underground conduit into the MEER at Banning Substation.	As a result of additional engineering analysis, the following changes have been identified: 2. Connect the existing Devers-Valley OPGW to the MEER in Banning Substation. □□Install approximately 690 feet of fiber optic cable in a new underground conduit between the existing Devers-Valley No. 2 500 kV structure ~~M21-T3~~ M21 T1 to an existing distribution pole on Coyote Trail approximately 3,200 feet west of Old Idyllwild Road. The new underground conduit would be installed by directional bore. From this existing distribution pole on Coyote Trail, install approximately 4,100 feet of new fiber optic cable east on existing distribution poles (combination of public and private lands) to a location 350 feet south of Old Idyllwild Road. From this location, install approximately 470 feet of fiber optic cable in new underground conduit to cross under the existing Devers-Valley 500 kV ROW to an existing distribution pole. From this location, install fiber optic cable overhead on a combination of distribution and subtransmission poles for approximately 2,100 feet to Wesley Street. The fiber optic cable would then extend east along Wesley Street for approximately 1,300 feet to existing SCE ROW and then north for approximately 3,300 feet to East Lincoln Street. It would transition underground at this location and install approximately ~~230~~ 280 feet of fiber optic cable and new ~~underground~~ conduit ~~into the MEER at Banning Substation~~ to an existing trench in Banning Substation and would additionally install approximately 170 feet of fiber optic cable trench to Banning Substation MEER.

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
B-16 through 17	3. Connect the existing Devers-Valley OPGW to the MEER in Maraschino Substation. □□Install approximately 1,500 feet of fiber optic cable and new underground conduit from the exist-ing Devers-Valley No. 2 500 kV structure M24-T3 to an existing distribution pole on Highland Springs Avenue approximately 300 feet south of Breckenridge Avenue. From this location, install approximately 1,700 feet of fiber optic cable on existing distribution poles along Highland Springs Avenue to approximately 190 feet south of Crooked Creek. At this location, the fiber optic cable would transition underground and extend 2,900 feet in existing underground conduit north to an existing vault approximately 300 feet north of Potrero Boulevard. From the existing vault, approxi-mately 1,000 feet of fiber optic cable and new conduit would be installed to East First Street. From East First Street, the fiber optic cable and conduit would extend west for approximately 600 feet to an existing manhole. From the existing manhole, the fiber optic cable would extend west within existing underground conduit for approximately 12,600 feet to a distribution riser pole 200 feet west of Beaumont Avenue. The fiber optic cable would be installed overhead for approxi-mately 3,200 feet on First Street to Veile Avenue. The fiber optic cable would then extend north on Veile Avenue on existing subtransmission poles for approximately 1,600 feet. From this loca-tion, the fiber optic cable would transition underground for 400 feet in an existing underground conduit and cable trench to the MEER located in Maraschino Substation. 4. Connect the Redlands Inland Empire District Office-San Bernardino fiber optic cable through pro-posed conduit and on proposed and existing poles. □□From the MEER located inside San Bernardino approximately 2,000 feet of fiber optic cable would be installed in an existing conduit and cable trench to a riser pole located outside of San Bernar-dino Substation on San Bernardino Avenue. From this location, approximately 1,260 feet of fiber optic cable would be installed on existing subtransmission poles extending east to Marigold Avenue. From this location, the telecommunications facilities would then be co-located on the newly relocated San Bernardino–Redlands-Timoteo 66 kV Subtransmission Line. The co-location of telecommunications would require approximately 6,140 feet of fiber optic cable be installed on new subtransmission structures in private and public rights-of-way to the first structure on Bryn Mawr Avenue just north of the proposed subtransmission TSP riser pole. The telecommunications facilities would transition underground at this location which would require the installation of approximately 560 feet of new conduit and fiber optic cable to an existing pole on the south side of Redlands Boulevard just west of Bryn Mawr Avenue. At this location, the new fiber optic cable would then transition overhead via a telecommunications riser and would connect to the existing fiber optic cable.	As a result of additional engineering analysis, the following changes have been identified: 3. Connect the existing Devers-Valley OPGW to the MEER in Maraschino Substation. □□Install approximately ~~1,500~~ 425 feet of fiber optic cable and new underground conduit from the exist-ing Devers-Valley No. 2 500 kV structure M24~~-T3~~ T1 to an existing distribution vault located on the west side of Highland Springs Avenue and the north boundary of the SCE 500kV right of way. From this location fiber optic cable would be installed north approximately 5,565 feet in existing conduit to an existing distribution vault approximately 300 feet north of Potrero Boulevard. ~~pole on Highland Springs Avenue approximately 300 feet south of Breckenridge Avenue. From this location, install approximately 1,700 feet of fiber optic cable on existing distribution poles along Highland Springs Avenue to approximately 190 feet south of Crooked Creek. At this location, the fiber optic cable would transition underground and extend 2,900 feet in existing underground conduit north to an existing vault approximately 300 feet north of Potrero Boulevard.~~ From the existing vault, approxi-mately 1,000 feet of fiber optic cable and new conduit would be installed to East First Street. From East First Street, the fiber optic cable and conduit would extend west for approximately 600 feet to an existing manhole. From the existing manhole, the fiber optic cable would extend west within existing underground conduit for approximately 12,600 feet to a distribution riser pole 200 feet west of Beaumont Avenue. The fiber optic cable would be installed overhead for approxi-mately 3,200 feet on First Street to Veile Avenue. The fiber optic cable would then extend north on Veile Avenue on existing subtransmission poles for approximately 1,600 feet. From this loca-tion, the fiber optic cable would transition underground for 400 feet in an existing underground conduit and cable trench to the MEER located in Maraschino Substation. As a result of additional engineering analysis, the following changes have been identified: 4. Connect the Redlands Inland Empire District Office-San Bernardino fiber optic cable through pro-posed conduit and on proposed and existing poles. □□From the MEER located inside San Bernardino approximately 2,000 feet of fiber optic cable would be installed in an existing conduit and cable trench to a riser pole located outside of San Bernar-dino Substation on San Bernardino Avenue. From this location, approximately 1,260 feet of fiber optic cable would be installed on existing subtransmission poles extending east to Marigold Avenue. From this location, the telecommunications facilities would then be co-located on the newly relocated San Bernardino–Redlands-Timoteo 66 kV Subtransmission Line. The co-location of telecommunications would require approximately 6,140 feet of fiber optic cable be installed on new subtransmission structures in private and public rights-of-way to the first structure on Bryn Mawr Avenue just north of the proposed subtransmission TSP riser pole. The telecommunications facilities would transition underground at this location which would require the installation of approximately ~~560~~ 400 feet of new conduit and fiber optic cable to an existing pole on the south side of Redlands Boulevard just ~~west~~ east of Bryn Mawr Avenue. At this location, the new fiber optic cable would then transition overhead via a telecommunications riser and would connect to the existing fiber optic cable. Please add new language below to the project description. 6. Connect El Casco-Banning Fiber Optic Cable (10132) to Devers-Vista Skywrap (09033) tap to Maraschino substation. □ Install approximately 790 feet of fiber optic cable on existing poles on Oak Valley Parkway west from an existing splice located at Oak View Drive to a distribution pole approximately 300 feet east of Golf Club drive. From this pole install approximately 1,150 feet of fiber optic cable and new conduit west crossing Interstate 10 to an existing distribution vault east of Desert Lawn Drive.

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
		7. Connect El Casco Fiber optic Cable (10132) to Vista-Moreno fiber Optic Cable (10131) tap to El Casco □ Install approximately 615 feet of fiber optic cable in existing underground conduit from a distribution vault on San Timoteo Canyon Road approximately 3,650 feet east of the railroad crossing at the El Casco Substation to the existing an riser pole. New conduit and fiber optic cable would be extended west from the existing conduit approximately 155 feet to an existing distribution pole. From this distribution pole approximately 3,060 feet of overhead fiber optic cable would be installed crossing the railroad to an existing pole with an existing pole on the west side of the access road to the El Casco Substation.
B-17	6. Connect Devers-Vista OPGW to the MEER in Banning Substation □□From the new 220 kV structure (Structure 5S54), install approximately 500 feet of fiber cable and new underground conduit to an existing distribution pole located approximately 660 feet north of Summit Drive on San Gorgonio Avenue. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in Banning Substation. 7. Connect Devers-Vista OPGW to the MEER in Maraschino Substation □□From the new 220 kV structure (Structure 4S37), install approximately 350 feet of fiber optic cable and new underground conduit to an existing manhole located on Oak View Drive approximately 320 feet north of Parkview Street. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in Maraschino Substation. 8. Connect the Devers-Vista OPGW to the MEER in El Casco Substation □□From the new 220 kV structure (Structure 3S02), install approximately 200 feet of fiber optic cable and new underground conduit to an existing manhole located in the existing SCE ROW immedi-ately south of the El Casco Substation. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in El Casco Substation. □□From the new 220 kV structure (Structure 3S25), install approximately 200 feet of fiber optic cable and new underground conduit to an existing distribution pole located nearby. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in El Casco Substation. 9. Connect the Devers-Vista OPGW and Devers–El Casco OPGW to the MEER in Devers Substation. □□From the new 220 kV structure (Structure 6N07), install approximately100 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located inside Devers Substation. □□From the new 220 kV structure (Structure 6S07), install approximately350 feet of fiber optic cable and new underground conduit to an existing cable trench located inside Devers Substation.	As a result of additional engineering analysis, the following changes have been identified, as a result of the changes please update the numbering of the bullets point as shown below: ~~6~~8 Connect Devers-Vista OPGW to the MEER in Banning Substation □□From the new 220 kV structure (Structure ~~5S54~~ 4S01), install approximately 500 feet of fiber cable and new underground conduit to an existing distribution pole located approximately 660 feet north of Summit Drive on San Gorgonio Avenue. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in Banning Substation. ~~7~~9. Connect Devers-Vista OPGW to the MEER in Maraschino Substation □□From the new 220 kV structure (Structure ~~4S37~~ 4S35), install approximately ~~350~~ 2012 feet of fiber optic cable and new underground conduit to an existing ~~manhole~~ distribution pole ~~located~~ on Oak View ~~Drive~~ Parkway approximately ~~320~~ 690 feet ~~north~~ east of ~~Parkview Street~~ Noble Creek across from Noble Creek Park. The new fiber optic cable would riser up the distribution pole and connect ~~in that manhole to~~ an existing fiber optic cable that extends to the MEER in Maraschino Substation. ~~8~~10. Connect the Devers-Vista OPGW to the MEER in El Casco Substation □□From the new 220 kV structure (Structure 3S02), install approximately 200 feet of fiber optic cable and new underground conduit to an existing manhole located in the existing SCE ROW immedi-ately south of the El Casco Substation. The new fiber optic cable would connect in that manhole to an existing fiber optic cable that extends to the MEER in El Casco Substation. □□From the new 220 kV structure (Structure 3S25), install approximately 200 feet of fiber optic cable and new underground conduit to an existing distribution pole located nearby. The new fiber optic cable would connect on that pole to an existing fiber optic cable that extends to the MEER in El Casco Substation. ~~9~~11. Connect the Devers-Vista OPGW and Devers–El Casco OPGW to the MEER in Devers Substation. □□From the new 220 kV structure (Structure ~~6N07~~ 6N10), install approximately ~~100~~ 1,805 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located beside the driveway to the ~~inside~~ Devers Substation. The fiber optic cable would then continue in existing conduit to the 220 kV MEER in Devers Substation. □□From the new 220 kV structure (Structure ~~6S07~~ 6S10), install approximately ~~350~~ 1,110 feet of fiber optic cable and new underground conduit to an existing ~~cable trench located inside~~ manhole located inside WOD Interim Reactors. The fiber optic The fiber optic cable would then continue in existing conduit to the 200kV MEER in Devers Substation.

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
B-17	10. Connect the Devers–El Casco OPGW and El Casco–San Bernardino OPGW to the MEER in El Casco Substation. □□From the new 220 kV structure (Structure 4N65), install approximately 850 feet of fiber optic cable and new underground conduit to an existing distribution manhole located outside El Casco Substation. □□From the new 220 kV structure (Structure 3N02), install approximately 200 feet of fiber optic cable and new underground conduit to an existing telecommunications manhole located outside El Casco Substation.	As a result of additional engineering analysis, the following changes have been identified: 1~~0~~. Connect the Devers–El Casco OPGW and El Casco–San Bernardino OPGW to the MEER in El Casco Substation. □□From the new 220 kV structure (Structure ~~4N65~~ 4N64), install approximately 850 feet of fiber optic cable and new ~~underground~~ conduit to an existing distribution manhole located outside El Casco Substation. From this manhole the fiber optic cable would continue in existing conduit to the 220kV MEER in the El Casco Substation. □□From the new 220 kV structure (Structure 3N02), install approximately ~~200~~ 350 feet of fiber optic cable and new underground conduit to an existing ~~telecommunications manhole located outside El Casco Substation.~~ Cable trench located inside El Casco Substation. The fiber optic cable would then continue to the El Casco 220kV MEER. □□From the new 220 kV structure (Structure 3N02), install approximately 115 feet of fiber optic cable and new underground conduit to new 220 kV structure (Structure 4N64),
B-18	11. Connect the El Casco–San Bernardino OPGW and San Bernardino–Vista OPGW to the MEER in San Bernardino Substation. □□From the new 220 kV structure (Structure 1E26), install approximately 350 feet of fiber optic cable and new underground conduit to an existing manhole. Install approximately 1,550 feet of fiber optic cable in existing conduit and 60 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation. □□From the new 220 kV structure (Structure 1W26), install approximately 350 feet of fiber optic cable and new underground conduit. Install approximately 315 feet of fiber optic cable in an exist-ing cable trench to the MEER inside San Bernardino Substation. 12. Connect the Devers-Vista OPGW to the MEER in Vista Substation. □□From the new 220 kV structure (Structure 2N37), install approximately 1,000 feet of fiber optic cable and new underground structures to the MEER inside Vista Substation. Fiber Optic Cable Removal. The removal of the existing fiber optic cable (located on the OHGW) from the existing 220 kV structures is described in Section B.2.1.1, 220 kV Transmission Line Segments. Addi-tionally, removal of the fiber optic portions from the 220 kV existing structures to connections in the field and/or at existing substations would be required and are described below: □□Removal of approximately 250 feet of fiber optic cable from conduit and 600 feet from a cable trench within Vista Substation. □□Removal of approximately 325 feet of fiber optic cable from conduit between existing Structure M17-T2 (existing Devers-Vista No. 2 220 kV structure) and a riser pole 660 feet north of Summit Drive on San Gorgonio Avenue. □□Removal of approximately 225 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the manhole located on Oak View Drive approximately 320 feet north of Parkview Street.	As a result of additional engineering analysis, the following changes have been identified: 1~~3~~. Connect the El Casco–San Bernardino OPGW and San Bernardino–Vista OPGW to the MEER in San Bernardino Substation. □□From the new 220 kV structure (Structure 1E26), install approximately ~~350~~ 40 feet of fiber optic cable and new underground conduit to ~~an existing~~ new manhole. From the new manhole install approximately 490 feet of fiber optic cable and new conduit to an existing manhole inside the San Bernardino Substation. From this existing manhole the fiber optic cable would continue in existing conduit to the MEER inside San Bernardino Substation. ~~Install approximately 1,550 feet of fiber optic cable in existing conduit and 60 feet of fiber optic cable in an existing cable trench to the MEER inside San Bernardino Substation.~~ □□From the new 220 kV structure (Structure 1W26), install approximately ~~350~~ 55 feet of fiber optic cable and new underground conduit to the new manhole installed for the route from Structure 1E26. From the new manhole the fiber optic cable would continue in existing conduit to the MEER inside San Bernardino Substation. ~~Install approximately 315 feet of fiber optic cable in an exist-ing cable trench to the MEER inside San Bernardino Substation.~~ 1~~2~~. Connect the Devers-Vista OPGW to the MEER in Vista Substation. □□From the new 220 kV structure (Structure ~~2N37~~ 2N36), install approximately 1,~~000~~ 420 feet of fiber optic cable and new conduit to an existing manhole inside the Vista substation, from the existing manhole install fiber optic cable in existing conduit to the MEER inside Vista Substation. ~~underground structures to the MEER inside Vista Substation.~~ **Fiber Optic Cable Removal.** The removal of the existing fiber optic cable (located on the OHGW) from the existing 220 kV structures is described in Section B.2.1.1, 220 kV Transmission Line Segments. Addi-tionally, removal of the fiber optic portions from the 220 kV existing structures to connections in the field and/or at existing substations would be required and are described below: □□Removal of approximately 250 feet of fiber optic cable from conduit and 600 feet from a cable trench within Vista Substation. □□Removal of approximately 325 feet of fiber optic cable from conduit between existing Structure M17-T2 (existing Devers-Vista No. 2 220 kV structure) and a riser pole 660 feet north of Summit Drive on San Gorgonio Avenue. □□Removal of approximately 2,595 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the riser pole located on Oak View Drive and Oak valley Parkway.~~Removal of~~

PAGE	DEIR/DEIS LANGUAGE	SOUTHERN CALIFORNIA EDISON'S COMMENT
		~~approximately 225 feet of fiber optic cable from conduit between existing Structure M24-T2 (existing Devers-Vista No. 2 220 kV structure) and the manhole located on Oak View Drive approximately 320 feet north of Parkview Street.~~
B-21	Under the heading 220 kV Transmission Line and the discussion of Segment 3B, the bullets under the third paragraph states: make determinations on the following structures (for lighting) and spans (for marker balls): □ 46 structures and 0 spans in Segment 1 □ 6 structures and 14 spans in Segment 2 □ 0 structures and 46 spans in Segment 3 □ 14 structures and 22 spans in Segment 4 □ 60 structures and 2 spans in the eastern portion of Segment 5 □ 0 structures and 10 spans in Segment 6	Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified: make determinations on the following structures (for lighting) and spans (for marker balls): □ 47 ~~46~~ structures and ~~0~~ 2 spans in Segment 1 □ 12 ~~6~~ structures and 14 spans in Segment 2 □ ~~0~~ 8 structures and ~~46~~ 56 spans in Segment 3 □ ~~14~~ 16 structures and ~~22~~ 23 spans in Segment 4 □ ~~60~~ 88 structures and ~~2~~ 8 spans in the eastern portion of Segment 5 □ 0 structures and 10 spans in Segment 6
B-21	**220 kV Transmission Line.** SCE anticipates that over the entire length of the Proposed Project (220 kV transmission lines component) approximately 220 structures and spans would be submitted to the FAA in order that the FAA could make the ultimate determinations for potential hazards. The structures requiring notification are more likely to trigger appurtenances that make structures or conductor spans more visible to aircraft. FAA's recommendations could include installation of lights on proposed new structures, or they could suggest installation of orange, yellow and white marker balls on certain conductor spans.	Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified: **220 kV Transmission Line.** SCE anticipates that over the entire length of the Proposed Project (220 kV transmission lines component) approximately ~~220~~ 171 structures and 113 spans would be submitted to the FAA in order that the FAA could make the ultimate determinations for potential hazards. The structures requiring notification are more likely to trigger appurtenances that make structures or conductor spans more visible to aircraft. FAA's recommendations could include installation of lights on proposed new structures, or they could suggest installation of orange, yellow and white marker balls on certain conductor spans.
B-21	Under the heading of 220 kV Transmission Line and the second paragraph on page B-21 states: Due to the proximity to the Banning Airport and potential feasibility issues with the route preferred by the Morongo Tribe, SCE submitted early FAA notification and received determinations from the FAA for the structures in the western most portion of Segment 5. FAA has indicated that 18 structures on the west end of the Morongo Reservation would benefit from lighting on the west end of the Morongo Reservation in order to consider them as "no hazard" facilities (see EIR/EIS Appendix 1B) (SCE, 2014).	Based on additional engineering analysis and updated analysis by SCE's aviation consultant, the following changes have been identified: Due to the proximity to the Banning Airport and potential feasibility issues with the route preferred by the Morongo Tribe, SCE submitted early FAA notification and received determinations from the FAA for the structures in the western most portion of Segment 5. FAA has indicated that 18 structures on the west end of the Morongo Reservation would benefit from lighting on the west end of the Morongo Reservation in order to consider them as "no hazard" facilities (see EIR/EIS Appendix 1B) (SCE, 2014).SCE anticipates four additional structures will benefit from lighting based on final engineering and resubmittal to the FAA.

<table>
<tr><td>B-22</td><td>Table B-4. Approximate Land Disturbance Summary for the Proposed Project</td><td>SCE has updated Table B-11 with revised acreages and, therefore, Table B-4 will need to be updated as well.</td></tr>
<tr><td>B-23</td><td>B.3.1.1 Staging Areas and other Work Areas
Table B-5. Potential Staging Yard Locations
Table B-6. Potential Staging Yard Approximate Land Disturbance</td><td>SCE has included an additional Material Staging Yard, due to the potential for any one of the yards listed in Table B-5 to be occupied and unavailable prior to SCE commencing with construction. SCE has also updated Figure B-16 to include the additional yard. A memo supporting the environmental analysis of this additional yard and concluding that the addition of this yard would not result in any additional impacts beyond those already described in the DEIR/DEIS is attached. See attached file "WODUP_MatichYardAssessement.pdf".

<table><tr><td>Yard Name</td><td>Location</td><td>Condition</td><td>Approximate Area (acres)</td></tr><tr><td><u>Matich Material and Equipment Staging Area</u></td><td><u>Southwest corner of E Theodore Street and N Hathaway</u></td><td><u>Previously Disturbed; Vacant</u></td><td><u>21</u></td></tr></table></td></tr>
<tr><td>B-24</td><td>Modifications or upgrades to the existing Vista, San Bernardino, El Casco, Etiwanda, Timoteo, Tennessee, and Devers Substations would be confined inside each existing site boundary fence for all the facilities.</td><td>As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Modifications or upgrades to the existing Vista, San Bernardino, El Casco, Etiwanda, ~~Timoteo, Tennessee,~~ and Devers Substations would be confined inside each existing site boundary fence for all the facilities.</td></tr>
<tr><td>B-27</td><td>Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.</td><td>As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.~~</td></tr>
<tr><td>B-27</td><td>Work at Etiwanda Substation would occur within the existing Mechanical and Electrical Equipment Room (MEER) and include replacement of protective relay equipment. Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.</td><td>As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Work at Etiwanda Substation would occur within the existing Mechanical and Electrical Equipment Room (MEER) and include replacement of protective relay equipment. ~~Work at Tennessee and Timoteo Substations would include replacement of circuit breakers and foundations.~~</td></tr>
</table>

B-27

Retaining walls may be required along some of the access roads. Retaining wall locations are preliminarily assumed to occur within areas identified for proposed grading. For the purposes of the environ-mental analysis, it is estimated that the project will have approximately 4,010 linear feet of retaining wall structures spread amongst the various project segments. The specific number of retaining wall structures and locations would be identified during final engineering. Retaining walls could range between 5 and 20 feet in exposed height.

Table B-10. Approximate Length of New Retaining Wall Per Segment

	Segment 1	**Segment 2**	**Segment 3**	**Segment 4**	**Segment 5**	**Segment 6**	**Total**
Retaining wall (feet)	0	810	2,050	350	400	400	4,010

As a result of additional engineering analysis, the following changes have been identified:

Retaining walls may be required along some of the access roads. Retaining wall locations are preliminarily assumed to occur within areas identified for proposed grading. For the purposes of the environ-mental analysis, it is estimated that the project will have approximately ~~4,010~~ 3,168 linear feet of retaining wall structures spread amongst the various project segments. The specific number of retaining wall structures and locations would be identified during final engineering. Retaining walls could range between ~~5~~ 2 and ~~20~~ 18 feet in exposed height.

The estimated length of new retaining walls for each segment is summarized in Table B-10, Approximate Length of New Retaining Wall per Segment, and shown in Figure B-17.

Table B-10. Approximate Length of New Retaining Wall Per Segment

Retaining wall (feet)	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
	0	~~810~~ 1124	~~2050~~ 1192	~~350~~ 431	~~400~~ 231	~~400~~ 190	~~4010~~ 3,168

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Found in Table B-9. Substation Cut/Fill Grading and Surface Improvements Summary

Timoteo Substation			
Substation equipment foundations, cut	Concrete	70	5
Substation equipment foundations, import	Concrete	60	4
Site fill	Soil	10	1
Tennessee Substation			
Substation equipment foundations, cut	Concrete	30	2
Substation equipment foundations, import	Concrete	40	2
Site cut	Soil	10	—

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

~~Timoteo Substation~~			
~~Substation equipment foundations, cut~~	~~Concrete~~	~~70~~	~~5~~
~~Substation equipment foundations, import~~	~~Concrete~~	~~60~~	~~4~~
~~Site fill~~	~~Soil~~	~~10~~	~~1~~
~~Tennessee Substation~~			
~~Substation equipment foundations, cut~~	~~Concrete~~	~~30~~	~~2~~
~~Substation equipment foundations, import~~	~~Concrete~~	~~40~~	~~2~~
~~Site cut~~	~~Soil~~	~~10~~	~~—~~

B-31

Table B-11. Transmission Approximate Land Disturbance

Project Feature	Site Quantity	Approximate Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored (Temporary)	Approximate Total Acres Permanently Disturbed
Guard structures	667	150 feet × 50 feet	114.8	114.8	0.0
Remove existing lattice steel tower1	408	220 feet × 220 feet	453.3	453.3	0.0
Remove existing tubular steel pole1	5	220 feet × 150 feet	3.8	3.8	0.0
Remove existing 220 kV wood H-frame & wood 3 pole structures1	182	175 feet × 125 feet	91.4	91.4	0.0
Construct new lattice steel tower2	413	220 feet × 220 feet	458.9	355.6	103.3
Construct new tubular steel pole2	76	220 feet × 150 feet	57.6	53.0	4.6
Conductor stringing setup area3	123	600 feet × 150 feet	254.1	254.1	0.0
Conductor splicing setup areas3	14	200 feet × 150 feet	9.6	9.6	0.0
Existing access roads to be improved4	130.0	linear miles × 18 feet'	283.6	0.0	283.6
New access roads4	20	linear miles × 18 feet	43.6	0.0	43.6
Crane pads, walls, cut slopes	—	—	2919.7	2840.5	79
Total Estimated Disturbance Acreage		4690.6	4176.3	514.3	

As a result of additional engineering analysis, and for consistency with the updated structure counts provided in comments above, the following changes have been identified:

Please make the following revision to the DEIR language.

Table B-11. Transmission Approximate Land Disturbance

Project Feature	Site Quantity	Approximate Disturbed Acreage Calculation (L × W)	Approximate Total Acres Disturbed During Construction	Approximate Total Acres to be Restored (Temporary)	Approximate Total Acres Permanently Disturbed
Guard structures	667	150 feet × 50 feet	114.8	114.8	0.0
Remove existing lattice steel tower1	~~408~~ 413	220 feet × 220 feet	~~453.3~~ 458.9	~~453.3~~ 458.9	0.0
Remove existing tubular steel pole1	5	220 feet × 150 feet	3.8	3.8	0.0
Remove existing 220 kV wood H-frame & wood 3 pole structures1	182	175 feet × 125 feet	91.4	91.4	0.0
Construct new lattice steel tower2	~~413~~ 384	220 feet × 220 feet	~~458.9~~ 426.7	~~355.6~~ 330.7	~~103.3~~ 96
Construct new tubular steel pole2	~~76~~ 83	220 feet × 150 feet	~~57.6~~ 62.9	~~53.0~~ 57.9	~~4.6~~ 5.0
Conductor stringing setup area3	123	600 feet × 150 feet	254.1	254.1	0.0
Conductor splicing setup areas3	14	200 feet × 150 feet	9.6	9.6	0.0
Existing access roads to be improved4	130.0	linear miles × 18 feet'	283.6	0.0	283.6
New access roads4	20	linear miles × 18 feet	43.6	0.0	43.6
Crane pads, walls, cut slopes	—	—	2919.7	2840.5	79
Total Estimated Disturbance Acreage			~~4690.6~~ 4669.2	~~4176.3~~ 4161.8	~~514.3~~ 507.5

B-31	Under Table B-11. Transmission Approximate Land Disturbance states: Source: SCE, 2013. 1 - Includes the removal of existing conductor, teardown of existing structure, and removal of foundation 2' below ground surface. 2 - Includes structure assembly& erection conductor& OPGW installation. Area to be restored after construction. Portion of ROW within 20' of ALL structures to remain cleared of vegetation. Permanently disturbed areas for LST = 0.25 acres, TSP=0.06 acres, LWS=0.05 acres, and H-Frame=0.06 acres. 3 - Based on 9,000' standard conductor reel lengths, conductor size, number of circuits, route design, and terrain. 4 - Based on approximate length of road in miles x driveable road width of 14'–22' with 2' of berm on each side of road. The disturbed acreage calculations are estimates based upon SCE's preferred area of use for the described project feature, the width of the existing right-of-way, or the width of the proposed right-of-way and, they do not include any new access/spur road information; they are subject to revision based upon final engineering and review of the project by SCE's Construction Manager and/or Contractor awarded project. Footing/Base Volume and Area Calculations (approximate): □□Average TSP depth 30 feet deep, 7-foot diameter, quantity 1 per TSP: earth removed for footing = 42.8 c.y.; surface area = 38.5 sq.ft. □□Average LWS/Wood pole depth 12 feet deep, 2.5-foot diameter, quantity 1 per LWS/wood pole; earth removed for pole base 2.2 c.y.; surface area = 4.9 sq.ft. □□Average Wood H-Frame depth 12 feet deep, 2.5-foot diameter, qty 2 per H-Frame: earth removed for pole base= 4.4 c.y.; surface area = 9.8 sq.ft. Permanent areas of disturbance were calculated based on the footprint of the structures with an additional 20-foot buffer around the structures reserved for operation and maintenance purposes and the utilization of the crane pad for O&M activities. Acres permanently disturbed are assumed to be project areas where the disturbance will continue to be used during Operations and Maintenance (O&M) Activities post construction. Areas that would be stabilized or revegetated per requirements identified in Section 4.4 Biological Resources and not used for O&M have been assumed to be temporarily impacted (Acres to be Restored).	Please see revised language. Source: SCE, ~~2013~~ 2015. 1 - Includes the removal of existing conductor, teardown of existing structure, and removal of foundation 2' below ground surface. 2 - Includes structure assembly& erection conductor& OPGW installation. Area to be restored after construction. Portion of ROW within 20' of ALL structures to remain cleared of vegetation. Permanently disturbed areas for LST = 0.25 acres, TSP=0.06 acres, LWS=0.05 acres, and H-Frame=0.06 acres. 3 - Based on 9,000' standard conductor reel lengths, conductor size, number of circuits, route design, and terrain. 4 - Based on approximate length of road in miles x driveable road width of 14'–22' with 2' of berm on each side of road. The disturbed acreage calculations are estimates based upon SCE's preferred area of use for the described project feature, the width of the existing right-of-way, or the width of the proposed right-of-way and, they do not include any new access/spur road information; they are subject to revision based upon final engineering and review of the project by SCE's Construction Manager and/or Contractor awarded project. Footing/Base Volume and Area Calculations (approximate): □□Average TSP depth 30 feet deep, 7-foot diameter, quantity 1 per TSP: earth removed for footing = 42.8 c.y.; surface area = 38.5 sq.ft. □□Average LWS/Wood pole depth 12 feet deep, 2.5-foot diameter, quantity 1 per LWS/wood pole; earth removed for pole base 2.2 c.y.; surface area = 4.9 sq.ft. □□Average Wood H-Frame depth 12 feet deep, 2.5-foot diameter, qty 2 per H-Frame: earth removed for pole base= 4.4 c.y.; surface area = 9.8 sq.ft. Permanent areas of disturbance were calculated based on the footprint of the structures with an additional 20-foot buffer around the structures reserved for operation and maintenance purposes and the utilization of the crane pad for O&M activities. Acres permanently disturbed are assumed to be project areas where the disturbance will continue to be used during Operations and Maintenance (O&M) Activities post construction. Areas that would be stabilized or revegetated per requirements identified in Section 4.4 Biological Resources and not used for O&M have been assumed to be temporarily impacted (Acres to be Restored).

<table>
<tr>
<td>B-32</td>
<td>The first paragraph under Table B-12. Subtransmission Approximate Land Disturbance states:

The foundation process begins with the drilling of the holes using truck- or track-mounted excavators with various diameter augers to match the diameter requirements of the structure type. LSTs typically require an excavated hole approximately 3 feet to 7 feet in diameter and approximately 15 feet to 50 feet deep; TSPs typically require an excavated hole approximately 5 feet to 12 feet in diameter and approxi-mately 30 feet to 60 feet deep. On average, each footing for a LST structure would project approximately 2 to 5 feet above ground level; TSP footings would project approximately 1 to 3 feet above ground level within franchise areas and approximately 2 to 4 feet above ground level in uninhabited areas.</td>
<td>As a result of additional engineering analysis, the following changes have been identified:

The foundation process begins with the drilling of the holes using truck- or track-mounted excavators with various diameter augers to match the diameter requirements of the structure type. LSTs typically require an excavated hole approximately 3 feet to 7 feet in diameter and approximately 15 feet to 50 feet deep; TSPs typically require an excavated hole approximately 5 feet to ~~12~~ 14 feet in diameter and approxi-mately 30 feet to 60 feet deep. On average, each footing for a LST structure would project approximately 2 to 5 feet above ground level; TSP footings would project approximately 1 to 3 feet above ground level within franchise areas and approximately 2 to ~~4~~ 5 feet above ground level in uninhabited areas.</td>
</tr>
<tr>
<td>B-33</td>
<td>The first sentence/paragraph on page B-33 states:

each site, LSTs would require approximately 20 to 310 cubic yards of concrete delivered to each struc-ture location and, TSPs would require approximately 25 to 270 cubic yards of concrete delivered to each structure location.</td>
<td>As a result of additional engineering analysis, the following changes have been identified:

each site, LSTs would require approximately 20 to 310 cubic yards of concrete delivered to each struc-ture location and, TSPs would require approximately 25 to ~~270~~ 370 cubic yards of concrete delivered to each structure location.</td>
</tr>
<tr>
<td>B-45</td>
<td>B.3.5.1 Access

Once the underground infrastructure is in place, the crews would install cable in two of the four conduits.</td>
<td>As a result of additional engineering analysis, the following changes have been identified:

Once the underground infrastructure is in place, the crews would install cable in two of the ~~four~~ six conduits.</td>
</tr>
<tr>
<td>B-46</td>
<td>
<table>
<tr><th>Project Feature</th><th>Site Quantity</th><th>Disturbed Acreage Calculation (L × W)</th><th>Approximate Total Acres Disturbed During Construction</th><th>Approximate Total Acres to be Restored</th><th>Approximate Total Acres Permanently Disturbed</th></tr>
<tr><td>Vault</td><td>10</td><td>55' × 40'</td><td>0.5</td><td>0.5</td><td>0</td></tr>
</table>
</td>
<td>
<table>
<tr><th>Project Feature</th><th>Site Quantity</th><th>Disturbed Acreage Calculation (L × W)</th><th>Approximate Total Acres Disturbed During Construction</th><th>Approximate Total Acres to be Restored</th><th>Approximate Total Acres Permanently Disturbed</th></tr>
<tr><td>Vault/Manhole</td><td>10</td><td>55' × 40'</td><td>0.5</td><td>0.5</td><td>0</td></tr>
</table>
</td>
</tr>
</table>

B-47	***Underground Telecom Facilities Installation – Fiber Optic Cable*** New underground conduit and structures would typically be installed using a backhoe. The trench would be excavated to approximately 12 to 18 inches wide and a minimum of approximately 36 inches deep. The ground disturbance area for the trenching would be approximately 25 feet wide by the specific length of the excavation. PVC conduit would be placed in the trench and covered with approximately 8 inches of concrete slurry, then backfilled and compacted. For manholes and pull boxes, a hole is exca-vated between approximately 4 to 10 feet deep, 5 to 8 feet long, and 4 to 8 feet wide. The ground dis-turbance area for the manhole installation is approximately 40 feet wide by 50 feet long. The distur-bance is due to activities associated with the conduit and structure installation and concrete encase-ment. The manhole or pull box would be lowered into place, connected to the conduits, and backfilled with 2-sack concrete/sand slurry. Excess soil would be hauled to an approved disposal facility in accord-ance with all applicable laws or may be used as fill material for transmission, subtransmission, distribu-tion, or substation project elements. Construction activities would typically include the use of a backhoe, dump trucks, crew trucks, and concrete trucks. See Figure B-23, Typical Telecommunications Duct Bank, for the standard telecommunications duct bank configuration. See Figure B-24, Typical Manhole Design, for the standard manhole configuration. The fiber optic cable would be installed throughout the length of the underground conduit and struc-tures by first installing an innerduct, which provides for protection and identification of the cable. The innerduct would be pulled in the conduit from structure to structure using a pull rope and pulling machine, or truck-mounted hydraulic capstan. After installation of the innerduct, the fiber optic cable would be pulled through the innerduct using similar equipment.	As a result of additional engineering analysis, the following changes have been identified: ***Underground Telecom Facilities Installation – Fiber Optic Cable*** New underground conduit and structures would typically be installed using a backhoe. The trench would be excavated to approximately 12 to 18 inches wide and a minimum of approximately 36 inches deep. The ground disturbance area for the trenching would be approximately 25 feet wide by the specific length of the excavation. PVC conduit would be placed in the trench and covered with approximately 8 inches of concrete slurry, then backfilled and compacted. For manholes and pull boxes, a hole is exca-vated between approximately 4 to 10 feet deep, 5 to 8 feet long, and 4 to 8 feet wide. The ground dis-turbance area for the manhole installation is approximately 40 feet wide by 50 feet long. The distur-bance is due to activities associated with the conduit and structure installation and concrete encase-ment. The manhole or pull box would be lowered into place, connected to the conduits, and backfilled with 2-sack concrete/sand slurry. Excess soil would be hauled to an approved disposal facility in accord-ance with all applicable laws or may be used as fill material for transmission, subtransmission, distribu-tion, or substation project elements. Construction activities would typically include the use of a backhoe, dump trucks, crew trucks, and concrete trucks. See Figure B-23, Typical Telecommunications Duct Bank, for the standard telecommunications duct bank configuration. See Figure B-24, Typical Manhole Design, for the standard manhole configuration. <u>New underground conduit would be installed by direction bore in this manner. Existing utilities that would be crossed or are in close proximity to the bore would be physically located by digging a pot hole with a backhoe or vacuum truck. A bore pit approximately two feet wide and ten feet long is then dug with a backhoe on each end of the proposed bore. The horizontal bore rig is set up at one of the bore pits. Setup includes anchoring the rig to the ground with augers attached to the front. The bore machine spins the drill head while inserting drilling rods behind the head as it is pushed through the ground. Drilling fluid under high pressure assist in drilling, moves the dirt loosened by the drill head, and holds the hole formed in the drilling process. Excess drilling fluid accumulated in the bore pits is vacuumed up and disposed of at safe site. The depth and direction of the bore is monitored and controlled by telemetry between the bore head and a devise held on the surface by a worker. The bore head is guided to the second bore pit where the drill head is removed and a reamer is installed on the drilling steel. The conduit that has been glued together and laid in line with the bore is then attached to the reamer. The conduit is installed in the bore as the reamer is pulled back to the bore rig. The bore pits are used for other bores going the opposite direction or will be part of the excavation for a manhole.</u> The fiber optic cable would be installed throughout the length of the underground conduit and struc-tures by first installing an innerduct, which provides for protection and identification of the cable. The innerduct would be pulled in the conduit from structure to structure using a pull rope and pulling machine, or truck-mounted hydraulic capstan. After installation of the innerduct, the fiber optic cable would be pulled through the innerduct using similar equipment.
B-57	Segment 6, Model 2 27.3 31.9	Please add Northern for the current values shown and add Southern with the respective values: Segment 6, Model 2 <u>Northern</u> 27.3 <u>Northern</u> 31.9 <u>Southern 28.4</u> <u>Southern 75.3</u>

B-59	• Arranging the conductors in a triangular configuration to maximize field cancellation.
	• Placing the conductors for the transmission line in the right-of-way at the greatest distance from build-ings housing priority land uses to reduce magnetic field exposure along the entire route, except where the location of existing utilities prevent strategic line placement.
	• Moving the conductors further from the edge of the right-of-way near high priority groups including school, day care, hospital and residential land uses.
		Please remove the current options listed and include the common magnetic field reduction options SCE utilizes to comply with the CPUC EMF Policy:
		• ~~Arranging the conductors in a triangular configuration to maximize field cancellation.~~
		• ~~Placing the conductors for the transmission line in the right-of-way at the greatest distance from build-ings housing priority land uses to reduce magnetic field exposure along the entire route, except where the location of existing utilities prevent strategic line placement.~~
		• ~~Moving the conductors further from the edge of the right-of-way near high priority groups including school, day care, hospital and residential land uses.~~
		• Increasing the distance from electrical facilities by:
		  ○ Increasing pole (structure) height,
		  ○ Increasing the width of right-of-way, and/or
		  ○ Locating power lines closer to the centerline of the corridor.
		• Reducing conductor (phase) spacing.
		• Arrange conductors to reduce magnetic field.
		• Converting single-phase circuits to split-phase circuits.

B-59	**Proposed EMF Reduction Measures.** The Preliminary Field Management Plan for the Proposed Project (EIR/EIS Appendix 4) includes each of these measures, as "no cost" and "low cost" magnetic field reduc-tion steps:	For clarification, please make the following revision: **Proposed EMF Reduction Measures.** The Preliminary Field Management Plan for the Proposed Project (EIR/EIS Appendix 4) includes each of these measures, as "no cost" ~~and~~ or "low cost" magnetic field reduction steps:
B-58	Segment 6, Model 2 27.3 31.9	Please add Northern for the current values shown and add Southern with the respective values: Segment 6, Model 2 Northern 13.0 Northern 0.9 Northern 137.2 Northern 54.8 Southern 156.2 Southern 53.9 Southern 164.0 Southern 63.9

B-63	**APM-BIO-9** **Jurisdictional Water Permits.** Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA and the SWRCB appropriate Regional Water Quality Control Boards in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits. The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, the EPA and the SWRCB Regional Boards as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA, SWRCB, and CDFW. Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP	For clarification regarding agency involvement for jurisdictional water permits for the Proposed Project, please make the following revision: **APM BIO-9** **Jurisdictional Water Permits.** Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA and the SWRCB ~~appropriate Regional Water Quality Control Boards~~ in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits. The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, the EPA and the SWRCB ~~Regional Boards~~ as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA, SWRCB, and CDFW. Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.
B-67	**Project 1:** Connecting to Blythe-Eagle Mountain 161 kV line (CAISO Queue 421)	SCE is aware that the Point of Interconnection for this project was changed from Blythe – Eagle Mountain 161kV to Red Bluff Substation 220 kV bus. Please make the following revision: **Project 1:** ~~Connecting to Blythe-Eagle Mountain 161 kV line~~ Red Bluff Substation 220 kV bus (CAISO Queue 421)
B-67	**Table B-22. Connected Actions – Solar Generation Projects** **Confidential Projects Requesting Interconnection** **Project 3:** Connecting at Colorado River Substation 230 kV (CAISO Queue 576)	**Known Projects with Interconnection Agreements** SCE would like to clarify that Project 3 has executed an interconnection agreement in July 2015 that presumes implementation of WOD Upgrade Project and achieving deliverability via Colorado River Substation. The Solar Star Blythe Mesa (Queue 576) was filed at FERC on July 31, 2015.
B-77	Figure B-2b	Please see attached file "WODUP_Figure B-2b_Rev.pdf" updating Figure B-2b.
B-105	Figure B-10	Please see attached file "WODUP_Figure B-10_Rev.pdf" updating Figure B-10.
B-125	Location 2: Removal of 12kV and Relocation on the New 66kV Structures.	Please remove location 2 from the map and legend, there is no overhead 12kV on Nevada St from Lugonia Ave to Almond Ave. ~~Location 2: Removal of 12kV and Relocation on the New 66kV Structures.~~

D.3-12

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
Timoteo Substation	1.4	0.3	0.1	0.1	6.4
Tennessee Substation	1.5	0.3	0.1	0.1	6.7
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	6,948.0	927.9	489.3	294.6	3,764.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations and revise the totals in the table as follows:

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
~~Timoteo Substation~~	~~1.4~~	~~0.3~~	~~0.1~~	~~0.1~~	~~6.4~~
~~Tennessee Substation~~	~~1.5~~	~~0.3~~	~~0.1~~	~~0.1~~	~~6.7~~
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	~~6,948.0~~ 6,945.1	~~927.9~~ 927.2	~~489.3~~ 488.6	~~294.6~~ 294.4	~~3,764.4~~ 3,751.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

ALTERNATIVES

C-3	**Basic Project Objective 1:** to upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW.	Please see SCE's accompanying cover letter and Attachment A: for reasons as to why Basic Project Objective 1 does not sufficiently meet the need for the WOD Upgrade Project.
C-7	**Phased Build Alternative** Fully meets all basic project objectives.	Please see SCE's accompanying cover letter and Attachment A: for concerns related to the Phased Build Alternative.
C-8	**500 kV Towers Alternative** Fully meets all basic project objectives	The conclusion that the 500 kV Towers Alternative meets all basic project objectives is not supported by the information included in the DEIR/DEIS. The DEIR/DEIS did not include a power flow study that would be needed to make such a conclusion.

C-25	The alternative would reduce environmental impacts, while still providing capacity for all the generation included in the CAISO 2024 Reliability Base Case. This scenario includes 3,754 MW of Total Generation On-line and 6,901 MW of Total Generation Capacity from all renewable and conventional resources, as well as the power flow on the system resulting from import of 1,400 MW from the Imperial Irrigation District into the Los Angeles Basin.	Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's lack of evidence supporting conclusions that the alternatives retained for full analysis would avoid or substantially lessen significant effects for the Proposed Project as well as and why the CAISO 2024 Reliability Base Case is incorrect for use in considering alternatives to the Proposed Project.
C-38	The SPS is also known as the existing West of Devers Remedial Action Scheme.	For clarification, please make the following revision: The SPS is also known as the ~~existing West of Devers~~ Devers Remedial Action Scheme.
C-39	**West of Devers Interim Project.** In 2011, CAISO found that placing series reactors on the Devers–San Bernardino 230 kV line and Devers–El Casco 230 kV line could balance the line loading on the existing WOD transmission lines. These reactors were installed in 2013; when needed, these reactors have been redirecting power flows onto the 500 kV system between the Devers and Valley Substations (also see Section B.1.1, Historical Background in Project Area).	The WOD interim is in-service all the time, please make the following revision: **West of Devers Interim Project.** In 2011, CAISO found that placing series reactors on the Devers–San Bernardino 230 kV line and Devers–El Casco 230 kV line could balance the line loading on the existing WOD transmission lines. These reactors were installed in 2013; ~~when needed,~~ these reactors have been redirecting power flows onto the 500 kV system between the Devers and Valley Substations (also see Section B.1.1, Historical Background in Project Area).
AGRICULTURE		
D.2-2	Agriculture plays a large economic role in both Riverside and San Bernardino Counties. In Riverside County, approximately 5 percent of the County's unincorporated areas are designated for agricultural use (County of Riverside 2008a, 2008b). In the 2007 USDA Agricultural Census, there were 3,463 farms in Riverside County with an average size of 102 acres (USDA, 2008). The gross value of the County's agricultural com-modities was $1.25 million in 2012 (14th in the state). Riverside County's top agricultural commodities were milk, ornamental nursery plants, grapes, and hay.	Based on review of the Riverside County Agricultural report referenced, please make the following revision: Agriculture plays a large economic role in both Riverside and San Bernardino Counties. In Riverside County, approximately 5 percent of the County's unincorporated areas are designated for agricultural use (County of Riverside 2008a, 2008b). In the 2007 USDA Agricultural Census, there were 3,463 farms in Riverside County with an average size of 102 acres (USDA, 2008). The gross value of the County's agricultural com-modities was $1.25 ~~m~~billion in 2012 (14th in the state). Riverside County's top agricultural commodities were milk, ornamental nursery plants, grapes, and hay.
D.2-3	In San Bernardino County, approximately 2 percent of the County's unincorporated areas are designated for agriculture (County of San Bernardino, 2009). In 2007, there were 1,405 farms in the County with an average size of 366 acres. The gross value was of the County's agricultural commodities was $466,505 (24th in the state). San Bernardino County's top agricultural commodities were milk, eggs, cattle, and hay.	Based on review of the San Bernardino County agricultural report referenced, please make the following revision: In San Bernardino County, approximately 2 percent of the County's unincorporated areas are designated for agriculture (County of San Bernardino, 2009). In 2007, there were 1,405 farms in the County with an average size of 366 acres. The gross value ~~was~~ of the County's agricultural commodities in 2012 was $582,229,000 ~~$466,505~~ (~~24~~ 18th in the state). San Bernardino County's top agricultural commodities were milk, eggs, cattle, and hay.

D.2-8 and 9	**D.2.3.2 CEQA Significance Criteria** The significance criteria listed below are based on the Environmental Checklist form in Appendix G of the CEQA guidelines. They are used to determine whether a project and its alternatives would result in significant impacts to agricultural resources as defined by CEQA. According to the CEQA Checklist, a project causes a potentially significant impact if it would: □ Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use; □ Conflict with existing zoning for agricultural use, or a Williamson Act contract; □ Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)); □ Result in the loss of forest land or conversion of forest land to non-forest use; or □ Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use. The project vicinity does not contain forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Pro-duction (as defined by Government Code Section 51104(g)).1 Therefore, impacts to forest land are not addressed further in this EIR. Impacts related to Williamson Act lands are also not addressed further because the nearest Williamson Act lands are 0.8 miles from the Proposed Project. For the purposes this analysis, impacts would be potentially significant if the Proposed Project would: □ Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farm-land), as designated by the Farmland Mapping and Monitoring Program, to non-agricultural use; □ Conflict with existing zoning for agricultural use; □ Involve other changes in the existing environment which, due to their location or nature, would impair the use of agricultural land. The third criteria addresses impairment of agricultural land rather than conversion in order to better capture indirect impacts and potential impacts to surrounding agricultural operations.	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following: ~~□ Involve other changes in the existing environment which, due to their location or nature, would impair the use of agricultural land.~~ ~~The third criteria addresses impairment of agricultural land rather than conversion in order to better capture indirect impacts and potential impacts to surrounding agricultural operations.~~

D.2-9	Impact AG-2: Project would conflict with existing zoning for agricultural use The Proposed Project would cross 267 acres of land zoned for agricultural use. The Proposed Project would be located on land zoned for agriculture in the cities of Banning, Loma Linda, and Redlands and in Riverside County. Agricultural zoning in the project vicinity is described in more detail in Section D.2.1 (Environmental Setting). In addition, City of Grand Terrace uses an Agriculture Overlay Zone in some areas under its jurisdiction, including portions of the project vicinity. Public utility transmission lines and poles are an allowable use in all of the agriculture zones affected by the Proposed Project. Therefore, the Proposed Project would not conflict with the use of lands zoned for agriculture. Potential construction impacts to agricultural operations would be temporary and would not conflict with zoning designations. The use of the transmission line and access roads during operations would be consistent with agricultural zoning	Impact AG-2 states that the project does not conflict with zoning for agricultural use but the discussion fails to include an explanation that the CPUC has preemptive jurisdiction over the Proposed Project as explained in Section A.4.3 Other Agencies. It is recommended that the following language be added: Impact AG-2: The <u>CPUC has preemptive jurisdiction over the Project, as such, the following information is provided for informational purposes only.</u> Project would conflict with existing zoning for agricultural use The Proposed Project would cross 267 acres of land zoned for agricultural use….
D.2-9	Paragraph 2, Sentence 4: The following is stated: Transmission infrastructure and new roads would permanently convert 3.5 acres of Important Farmland to non-agricultural use.	Please make the following revisions to acknowledge that tower removals would result in a benefit: : Transmission infrastructure and new roads would permanently convert **3.5** acres of Important Farmland to non-agricultural use. This is an <u>overestimation as it does not take into account acreage that may be converted back to agricultural uses with the removal of the existing transmission lines.</u>
D.2-10	**D.2.3.3 Impacts and Mitigation Measures** ***Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land*** Temporary impacts could include damage to equipment, crops, and livestock from increased traffic on farm roads; water and soil contamination; suppression of plant growth by fugitive dust; soil erosion; and the spread of weeds.	The statement that the Proposed Project could result in damage to equipment and/or damage due to increased traffic is unsubstantiated. Please make the following revision: Temporary impacts could include damage to ~~equipment,~~ crops~~,~~ and livestock ~~from increased traffic on farm roads;~~ water and soil contamination; suppression of plant growth by fugitive dust; soil erosion; and the spread of weeds.

D.2.10 through 11	***Mitigation Measures for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land*** **AG-3a Establish agreement and coordinate construction activities with agricultural landowners.** Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that will be used for construc-tion and operation of the project, access and spur roads, staging areas, and other project-related activities. The purpose of this agreement will be to set forth the use of Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricul-tural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE. SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil prepara-tion, regrading, and reseeding. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.	Mitigation Measure AG-3a as written is unnecessarily restrictive and disproportionate to the potential temporary impact. AG-3a could result in project delay due to inability to procure agreements mandated by this mitigation measure. In addition, SCE has existing easement rights that grant SCE the right to construct without having to secure an additional agreement within the existing ROW. Please make the following revisions: **AG-3a Establish agreement and coordinate construction activities with agricultural landowners.** Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall ~~secure a signed agreement~~ coordinate with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that is currently being used for agricultural purposes and that will be used for construc-tion and operation of the project, access and spur roads, staging areas, and other project-related activities. Should SCE require an additional agreement, such as a temporary entry permit or temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing or newly acquired/upgraded easement right to perform construction activities. The purpose of this agreement will be to set forth the use of agriculturally utilized Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricul-tural operations would be minimized as feasible, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE and also in accordance with the existing easement language, if construction activities occur within the existing SCE ROW. SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons as feasible. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE and also in accordance with the existing easement language. This could include activities such as soil prepara-tion, regrading, and reseeding. SCE restoration activities performed will vary dependent upon the language within the existing or newly acquired/upgraded easement document. This measure applies to agricultural landowners with agriculturally utilized land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland that is currently utilized for agriculture through the submittal of a signed temporary construction easement or grant of easement agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction. If SCE is unable to coordinate construction activities or enter into a temporary construction easement with any of the land owners, due to an inability to agree to the terms of the agreement or for any other reason, SCE shall notify the CPUC/BLM and the CPUC/BLM shall allow the project construction to continue absent such an agreement.

D.2-11	Mitigation Measure for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land AG-3a Establish agreement and coordinate construction activities with agricultural landowners. Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project related activities. The purpose of this agreement will be to set forth the use of Prime Farmland, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricultural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE. SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeding. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.	Mitigation Measure AG-3a is unnecessarily restrictive and disproportionate to the potential temporary impact. Additionally, AG-3a would allow project opponents the ability to delay the project by refusing to enter into agreements mandated by this mitigation measure. SCE recommends that mitigation measure AG.3a include the following language: • Southern California Edison (SCE) shall <u>coordinate</u> with property owners of Important Farmland (Prime Farmland, Farmland of Statewide Importance, Unique Farmland) that will be used for construction and operation of the project, access and spur roads, staging areas, and other project related activities. <u>Should SCE require an additional agreement, such as a temporary entry permit or temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing or newly acquired/ upgraded easement right to perform construction activities.</u> • "…avoiding construction during peak planting, growing, and harvest seasons." Peak planting, growing and harvest seasons are undefined times that may vary depending on crop type and the particular landowner. Including such a requirement has the potential to impact SCE's ability to construct the project. As explained in Section B.3.10 Construction Schedule and Sequence, the construction of the Proposed Project would be complex, given the need to keep existing WOD facilities operational during construction and the need to construct safely when in proximity to energized lines. Construction of the Proposed Project is primarily dependent on outages from the CAISO and such a constraint as avoiding construction during peak planting, growing, and harvest seasons which is undefined represents a requirement that is disproportional the impact the document is assessing. • If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil preparation, regrading, and reseeding. SCE restoration activities performed will vary dependent upon the language within the existing or newly acquired/ upgraded easement document.
D.2-12	**D.2.3.5 CEQA Significance Determination for Proposed Project and Connected Actions** ***Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III for Proposed Project; Class II for Connected Actions)*** Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use. The scale of this impact is very small, well below the signifi-cance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).	Consistent with the comment provided above, please make the following revision: ***Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III for Proposed Project; Class II for Connected Actions)*** Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use~~.~~ <u>; this would be an overestimation as it does not take into account acreage that may be converted back to agricultural uses with the removal of the existing transmission lines.</u>". The scale of this impact is very small, well below the signifi-cance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).

D.2-12	**D.2.3.5 CEQA Significance Determination for Proposed Project and Connected Actions** ***Impact AG-1: Project would permanently convert Important Farmland to non-agricultural use (Class III for Proposed Project; Class II for Connected Actions)*** Construction and operation of the Proposed Project would permanently convert 3.5 acres of designated Important Farmland to non-agricultural use. The scale of this impact is very small, well below the signifi-cance threshold of 10 acres of Prime Farmland or 40 acres of non-Prime Farmland. Therefore, this impact would be less than significant, and no mitigation is required (Class III).	The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.2-12	***Impact AG-2: Project would conflict with existing zoning for agricultural use (No Impact for Proposed Project; Class II for Connected Actions)*** Both the Desert Center and the Blythe areas include lands that are enrolled in Williamson Act contracts, as well as lands zoned for agricultural use. Depending on the location of the connected actions in these areas, construction and operation would disturb existing agriculture and may require the cancellation of existing Williamson Act contracts. Typical mitigation for this type of impact would be to establish a Wil-liamson Act agricultural preserve in the event that an existing Williamson Act is cancelled. This would reduce impacts to a less than significant level. Conflicts with other agricultural zoning could be mini-mized through the creation of an agricultural easement or agricultural land mitigation program. With mitigation if required, impacts to agricultural zoning would be less than significant (Class II).	The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.2-13	***Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)*** The Proposed Project would temporarily disturb a total of 31.6 acres of designated Important Farmland (26.1 acres of Prime Farmland, 4.7 acres of Farmland of Statewide Importance, and 0.8 acres of Unique Farmland). Surrounding agricultural land may also be affected by temporary construction impacts. These impacts would be minimized through the implementation of Mitigation Measures AG-3a (Establish agreement and coordinate construction activities with agricultural landowners), AQ-1a (Control Fugitive Dust), AQ-1b (Control Off-Road Equipment Emissions), LU-2a (Prepare construction notification plan), HH-1a (Prepare a hazardous materials and waste management plan), HH-2a (Prepare a soil management plan), and HH-3a (Identify pesticide/herbicide contamination). With these measures, impacts would be less than significant.	The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

D.2-13	***Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)*** The Proposed Project would temporarily disturb a total of 31.6 acres of designated Important Farmland (26.1 acres of Prime Farmland, 4.7 acres of Farmland of Statewide Importance, and 0.8 acres of Unique Farmland). Surrounding agricultural land may also be affected by temporary construction impacts. These impacts would be minimized through the implementation of Mitigation Measures AG-3a (Establish agreement and coordinate construction activities with agricultural landowners), AQ-1a (Control Fugitive Dust), AQ-1b (Control Off-Road Equipment Emissions), LU-2a (Prepare construction notification plan), HH-1a (Prepare a hazardous materials and waste management plan), HH-2a (Prepare a soil management plan), and HH-3a (Identify pesticide/herbicide contamination). With these measures, impacts would be less than significant.	The DEIR should clarify that the potential mitigation measures referenced with respect to connected actions will not be imposed on SCE nor are they required to be implemented prior to construction of the West of Devers project.
D.2-14	Impact AG-2: Project would conflict with existing zoning for agricultural use Limited areas of land zoned for agriculture would be affected under this alternative. Transmission lines and transmission structures are allowed uses in agriculture zoned areas. The amount of agricultural land affected would be similar under both the Proposed Project and the Tower Relocation Alternative. An extended construction period and the use of temporary shoo-flies would not conflict with agricultural zoning.	As explained above, Impact AG-2 states that the project does not conflict with zoning for agricultural use, but the discussion fails to include an explanation that the CPUC has preemptive jurisdiction over the Proposed Project as explained in Section A.4.3 Other Agencies. It is recommended that the following language be added as follows: Impact AG-2: The <u>CPUC has preemptive jurisdiction over the Project, therefore, the following information is provided for informational purposes only.</u> Limited areas of land zoned for agriculture would be affected under this alternative.

D.2-14	**D.2.4.1 Tower Relocation Alternative** ***Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class III)*** Moving selected transmission structures 50 feet from their proposed positions would not require changes in the existing environment that would impair the use of agricultural land. The same access roads and the same number of pads would be required as under the Proposed Project. An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land.	The statement that "An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land." is inconsistent with findings made for the Proposed Project (which consists of the same type of work) as well as with language further down on the page as follows: **CEQA Significance Determination for Tower Relocation Alternative** ***Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land (Class II)*** Relocating a proposed transmission structure to a new position nearby in the ROW would not impair the use of agricultural land more than it might have been impaired by the Proposed Project. The same mitigation measures applied to the Proposed Project would apply under the Tower Relocation Alternative. These are Mitigation Measure AG-3a, AQ-1a, AQ-1b, LU-2a, HH-1a, HH-2a, and HH-3a, described in Sec-tion D.2.3.3. With implementation of these mitigation measures, impacts would be less than significant (Class II). SCE suggests the following revisions for consistency: **D.2.4.1 Tower Relocation Alternative** ***Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land*** ~~Moving selected transmission structures 50 feet from their proposed positions would not require changes in the existing environment that would impair the use of agricultural land. The same access roads and the same number of pads would be required as under the Proposed Project. An additional year on the construction schedule and the temporary placement of shoo-flies would not impair the use of agricultural land.~~ Relocating a proposed transmission structure to a new position nearby in the ROW would not impair the use of agricultural land more than it would have been impaired by the Proposed Project. The same mitigation measures applied to the Proposed Project would apply to the Tower Relocation Alternative. These are Mitigation Measure AG-3a, AQ-1a, AQ-1b, LU-2a, HH-1a, HH-2a, and HH-3a, described in Sec-tion D.2.3.3. With implementation of these mitigation measures, impacts would be less than significant (Class II).

D.2 -17	***Mitigation Measures for Impact AG-3: Project would involve changes in the existing environment which would impair the use of agricultural land*** **AG-3a Establish agreement and coordinate construction activities with agricultural landowners.** Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall secure a signed agreement with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that will be used for construc-tion and operation of the project, access and spur roads, staging areas, and other project-related activities. The purpose of this agreement will be to set forth the use of Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricul-tural operations would be minimized, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE. SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed area in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE. This could include activities such as soil prepara-tion, regrading, and reseeding. This measure applies to agricultural landowners with land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland through the submittal of a signed agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction.	Mitigation Measure AG-3a as written is unnecessarily restrictive and disproportionate to the potential temporary impact. AG-3a could result in project delay due to inability to procure agreements mandated by this mitigation measure. In addition, SCE has existing easement rights that grant SCE the right to construct without having to secure an additional agreement within the existing ROW. Please make the following revision: **AG-3a Establish agreement and coordinate construction activities with agricultural landowners.** Sixty (60) days prior to the start of project construction, Southern California Edison (SCE) shall ~~secure a signed agreement~~ coordinate with property owners of Important Farmland (Prime Farm-land, Farmland of Statewide Importance, Unique Farmland) that is currently being used for agricultural purposes and that will be used for construc-tion and operation of the project, access and spur roads, staging areas, and other project-related activities. Should SCE require an additional agreement, such as a temporary construction easement, it would be for temporary purposes outside of the existing SCE ROW whereby SCE does not have an existing easement right to perform construction activities. The purpose of this agreement will be to set forth the use of agriculturally utilized Prime Farm-land, Farmland of Statewide Importance, Unique Farmland during construction in order to: (1) schedule proposed construction activities at a location and time when damage to agricul-tural operations would be minimized as feasible, and (2) ensure that any areas damaged or disturbed by construction are restored to a condition mutually agreed upon by the landowner and SCE and also in accordance with the existing easement language, if construction activities occur within the existing SCE ROW. SCE shall coordinate with the agricultural landowners in the affected areas where Important Farmland will be temporarily disturbed in order to determine when and where construction should occur in order to minimize damage to agricultural operations. This includes avoiding construction during peak planting, growing, and harvest seasons as feasible. If damage or destruction does occur, SCE shall perform restoration activities on the disturbed in order to return the area to a pre-determined condition or the pre-construction condition, whichever option is agreed upon by the landowner and SCE and also in accordance with the existing easement language. This could include activities such as soil prepara-tion, regrading, and reseeding. This measure applies to agricultural landowners with agriculturally utilized land that is impacted by the Proposed Project. SCE shall provide proof of the continued use of Important Farmland that is currently utilized for agriculture through the submittal of a signed temporary construction easement or grant of easement agreement between an individual property owner and SCE. The signed agreements shall be submitted to the CPUC for review and approval prior to the start of construction. If SCE is unable to coordinate construction activities or enter into a temporary construction easement with any of the land owners, due to an inability to agree to the terms of the agreement or for any other reason, SCE shall notify the CPUC/BLM and the CPUC/BLM shall allow the project construction to continue absent such an agreement.
AIR QUALITY		
D.3-5	Sensitive receptors in the Blythe Area include agricultural uses, recreational resources, and residences in the City of Blythe and unincorporated Riverside County.	Please remove "agricultural uses," because agricultural uses are not considered sensitive receptors for air quality. Sensitive receptors in the Blythe Area include ~~agricultural uses~~, recreational resources, and residences in the City of Blythe and unincorporated Riverside County.

D.3-7	The AQMP is the current (2012) comprehensive attainment strategy for ozone and PM2.5. The AQMP identifies the rules and regulations and contingency measures that demonstrate how the region will achieve the necessary overall emission reductions to attain the federal 24-hour PM2.5 standard in 2014, with a possibility of up to a five-year extension by U.S. EPA to 2019, if needed. An update of the plan is planned for 2016. The 2012 AQMP also provides an update to demonstrate progress in attaining the 8-hour ozone standard in 2023 (SCAQMD, 2013).	It is relevant to note that the 2012 AQMP specifically takes into consideration emissions from the Proposed Project. SCE recommends including the following language when discussing the 2012 AQMP: Estimated annual NOx emissions on Federal Lands associated with the Proposed Project are described in the 2012 AQMP as follows: Southern California Edison (SCE) is currently in the process of, or has plans to construct six linear transmission line projects which would traverse federal lands within the jurisdiction of the [SCAQMD]. The projects are: (1) Devers-Palo Verde No. 2 Transmission Project (DPV2); (2) Tehachapi Renewable Transmission Project (TRTP); (3) Falcon Ridge Substation Project (Falcon Ridge); (4) Path 42 Upgrade Project (Path 42); (5) West of Devers Interim Projects (WOD Interim); and (6) West of Devers Upgrade Project (WOD Upgrade). SCE submitted to the District the NOx emissions estimates expected to be generated during the construction of these transmission lines from 2012 to 2022. The total estimated NOx emissions from these six projects within the South Coast Air Basin are 95 tons per year for 2012; 55 tons per year for 2013; 10 tons per year for 2014; 20 tons per year for 2015; 50 tons per year for 2016 and 2017; and 20 tons per year for 2018 through 2022. These emissions have been accounted for in the general conformity set aside account for NOx." (SCAQMD 2012:III-2-53)
D.3-8	D.3.3 Environmental Impacts of the Proposed	Add "Project" at the end of the heading D.3.3 Environmental Impacts of the Proposed Project
D.3-11	The factors are used in conjunction with SCE's preliminary understanding of equipment activity and construction schedule, which means that the results are estimates based on assumptions that would be refined by SCE after final engineering.	SCE would like to clarify that should the assumptions not be changed as a result of final engineering, SCE would not refine the equipment activity and construction schedule from what has been included in this DEIR/DEIS.

D.3-12

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
Timoteo Substation	1.4	0.3	0.1	0.1	6.4
Tennessee Substation	1.5	0.3	0.1	0.1	6.7
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	6,948.0	927.9	489.3	294.6	3,764.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

Please remove the following references to Timoteo and Tennessee Substations.

Table D.3-8. Construction-Phase Regional Emissions Impacts (lb/day)

Project Component	NOx	VOC	PM10	PM2.5	CO
Devers Substation	59.0	8.1	3.4	2.7	40.8
El Casco Substation	53.3	7.2	2.9	2.4	33.3
Vista Substation	53.4	7.4	3.0	2.4	35.1
San Bernardino Substation	61.5	8.4	4.1	2.9	40.4
Etiwanda Substation	0.2	0.0	0.0	0.0	2.0
~~Timoteo Substation~~	~~1.4~~	~~0.3~~	~~0.1~~	~~0.1~~	~~6.4~~
~~Tennessee Substation~~	~~1.5~~	~~0.3~~	~~0.1~~	~~0.1~~	~~6.7~~
220 kV Transmission Line	4,009.0	525.9	243.2	155.9	2,259.0
Shoo-Fly	1,739.3	241.3	165.0	87.7	837.6
66 kV Subtransmission Line	828.2	111.5	57.1	34.8	448.6
Telecommunications System	141.2	17.4	9.9	5.6	54.6
Total Peak Daily Construction	~~6,948.0~~ 6,945.1	~~927.9~~ 927.2	~~489.3~~ 488.6	~~294.6~~ 294.4	~~3,764.4~~ 3751.4
Total Peak Construction with APMs	5,558.4	927.9	378.3	271.6	3,764.4
SCAQMD Regional Threshold for Construction	100	75	150	55	550

D.3-13

Summary for Construction Emissions of Criteria Pollutants. Controlling dust and equipment exhaust emissions would be necessary to avoid causing any new violations or contributing substantially to exist-ing violations of the ambient air quality standards and to avoid interfering with the established attain-ment plans. The Proposed Project would be required to implement dust controls required by SCAQMD Rules 403 and 403.1 so that dust does not remain visible in the atmosphere beyond the edge of the right-of-way or create a nuisance off-site.

In order to remain consistent with SCAQMD Rule 403 (d)(1)(A), SCE recommends referencing "property line" instead of "right-of-way".

Summary for Construction Emissions of Criteria Pollutants. Controlling dust and equipment exhaust emissions would be necessary to avoid causing any new violations or contributing substantially to exist-ing violations of the ambient air quality standards and to avoid interfering with the established attain-ment plans. The Proposed Project would be required to implement dust controls required by SCAQMD Rules 403 and 403.1 so that dust does not remain visible in the atmosphere beyond the edge of the ~~right-of-way~~ property line or create a nuisance off-site.

D.3-13	***Mitigation Measures for Impact AQ-1*** **AQ-1a Control fugitive dust.** SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures: □□Traffic speeds on unpaved roads shall not exceed 15 miles per hour. □□A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites. □□Unpaved roads, substation areas, and staging areas shall be watered three times daily when being used by construction vehicle traffic, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions. □□Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered. □□Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet. □□Soil truck loads shall be covered and gate seals on dump trucks shall be tight. □□Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.	To maintain consistency with air quality regulations and concerns with implementation and enforcement as currently drafted, please make the following revisions. Bullet 2: As it related to the requirement to traffic route plan, SCE has already identified access from paved and unpaved roads that have been provided to the CPUC. As a general construction practice, SCE already selects the most efficient route to minimize unpaved road travel. The measure requests SCE to reduce unpaved road travel, however, such a requirement would not result in a substantial or quantifiable reduction in fugitive dust emissions. Bullet 3: Substation and staging areas (as identified in Table B-5) are going to be rocked and, therefore, stabilized which mitigates the need for watering. SCE intends to comply with Rule 403 to minimize fugitive dust, therefore, prescribing an activity "three times daily" may be insufficient or excessive depending on precipitation and/or soil saturation. Bullet 7: Due to the potential and frequency of winds to be in excess of 15 mph in the project area the measure has been revised to more suitably reflect the ability to construct the project while maintaining the intent of the regulation. SCE has demonstrated on previous projects within this project area the ability to successfully prevent fugitive dust under high wind conditions during construction. ***Mitigation Measures for Impact AQ-1*** **AQ-1a Control fugitive dust.** SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures: □□Traffic speeds on unpaved roads shall not exceed 15 miles per hour. ~~□□A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.~~ □□SCE will provide maps to its construction contractors that show the travel routes that should be followed to minimize unpaved road use. □□~~w~~When being actively used by construction vehicle traffic, ~~U~~unpaved roads and project disturbance areas ~~,substation areas, and staging areas~~ shall be watered, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations, ~~three times daily~~ in sufficient quantities to maintain compliance with AQMD and jurisdictional requirements. ~~or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions.~~ □□Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered. □□Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet. □□Soil truck loads shall be covered and gate seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements. □□Construction activities that occur on unpaved surfaces shall be discontinued during periods ~~of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and~~ when ~~those~~ activities are causing visible dust plumes that cannot be mitigated by approved dust suppression methods. ~~All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.~~

D.3-13	□□Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered. □□Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet. □□Soil truck loads shall be covered and gate seals on dump trucks shall be tight. □□Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.	□□Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered. □□Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet. □□Soil truck loads shall be covered and gate seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements. □□Construction activities that occur on unpaved surfaces shall be discontinued during periods ~~of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and~~ when ~~those~~ activities are causing visible dust plumes that cannot be mitigated by approved dust suppression methods. ~~All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.~~
D.3-14	The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;	Please add clarifying language as follows: The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments (i.e watering, soil binders, etc…) that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;
D.3-14	Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area.	Please add clarifying language as follows: Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area or right-of-way (ROW).
D.3-19	***Impact AQ-2: Construction would generate emissions of toxic air contaminants (Class III for Proposed Project; Class II for Connected Actions)*** Construction activities for the connected actions would be in a localized area, unlike the Proposed Project where activities would occur throughout the transmission corridor. The localized nature of the connected action construction could result in excessive concentrations of TACs……Impacts from the generation of TACs during construction of the connected actions would be less than significant with mitigation (Class II).	The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.3-19	***Impact AQ-3: Operation, maintenance, and inspections would generate dust and exhaust emissions (Class III for Proposed Project; Class II for Connected Actions)*** The connected actions involve the construction of solar generation facilities in the Desert Center and Blythe areas… The impact of operation, maintenance, and inspection activities in terms of generating dust and exhaust emissions would be less than signifi-cant with implementation of recommended mitigation (Class II).	The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

<table>
<tr>
<td>D.3-24 through 25</td>
<td>D.3.4.3 Phased Build Alternative

Impact AQ-1: Construction would generate dust and exhaust emissions of criteria pollutants

Impact AQ-2: Construction would generate emissions of toxic air contaminants (Class III for Proposed Project; Class II for Connected Actions)

Impact AQ-1: Construction would generate dust and exhaust emissions of criteria</td>
<td>As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional emissions impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.</td>
</tr>
<tr>
<td>D.3-25</td>
<td>MITIGATION MEASURE

AQ-1c: Control helicopter emissions. Helicopter emissions shall be reduced by the following methods and measures:

 Helicopter idling will occur only when necessary for safe operation and emergency readiness purposes.

 Helicopter operators shall use the smallest practical and available helicopter for each lift operation.

 Fugitive dust from helicopter rotor wash will be reduced through the implementation of the following measures:

– The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency neces-sary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;

– Enough land area shall be obtained for each helicopter staging area not located on existing paved airfields or other large paved sites, so that rotor wash does not create visible fugitive dust emissions outside of the controlled staging area.

– Helicopter operations will take flight paths (i.e. elevation above ground) that will eliminate dust emissions from rotor wash when travelling between the helicopter staging area and the work sites.

– The helicopter work sites shall be watered prior to helicopter visits. Alternatively, other soil stabilizers shall be applied at a frequency necessary to create and maintain a surface soil crust while helicopter visits are occurring at the work site.

Location Construction activity in all segments.
Monitoring / Reporting Action CPUC/BLM monitor verifies that helicopter use and helicopter staging areas are managed as specified.
Effectiveness Criteria Dust caused by rotor wash does not remain visible beyond staging areas or work sites, and helicopter operator contracting agreements include the specifications.</td>
<td>Contracts entered into by SCE and construction contractors require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and lastly, construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please make the following edits:

Location Construction activity in all segments.
Monitoring / Reporting Action CPUC/BLM monitor verifies that helicopter use and helicopter staging areas are managed as specified.
Effectiveness Criteria Dust caused by rotor wash does not remain visible beyond staging areas or work sites<u>.</u><s>, and helicopter operator contracting agreements include the specifications.</s></td>
</tr>
</table>

D.3-27	***Mitigation Measures for Impact AQ-1*** **AQ-1a Control fugitive dust.** SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures: □□Traffic speeds on unpaved roads shall not exceed 15 miles per hour. □□A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites. □□Unpaved roads, substation areas, and staging areas shall be watered three times daily when being used by construction vehicle traffic, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions. □□Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered. □□Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet. □□Soil truck loads shall be covered and gate seals on dump trucks shall be tight. □□Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1. □□Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered. □□Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet. □□Soil truck loads shall be covered and gate seals on dump trucks shall be tight. □□Construction activities that occur on unpaved surfaces shall be discontinued during periods of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and when those activities are causing visible dust plumes. All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.	To maintain consistency with air quality regulations and to address SCE's concerns with implementation and enforcement as currently drafted in the DEIR/DEIS, please make the following revisions: ***Mitigation Measures for Impact AQ-1*** **AQ-1a Control fugitive dust.** SCE shall develop a Fugitive Dust Control Plan and at least 60 days prior to construction submit the plan to the CPUC/BLM and SCAQMD for review and approval. The approved plan shall be implemented for all construction activities that may be a source of fugitive dust. Any fugitive dust control requirements in the SCAQMD rules and regulations, specifically Rule 403 and Rule 403.1, that are in addition to or more stringent than the requirements listed below shall be implemented and included in the plan. The plan shall include the following feasible measures: □□Traffic speeds on unpaved roads shall not exceed 15 miles per hour. ~~□□A traffic route plan shall be developed to identify and limit the access and egress points from unpaved roads, while also reducing the amount of unpaved road travel necessary to access the transmission structure work sites.~~ □□SCE will provide maps to its construction contractors that show the travel routes that should be followed to minimize unpaved road use. □□~~w~~When being actively used by construction vehicle traffic, ~~U~~unpaved roads and project disturbance areas ~~,substation areas, and staging areas~~ shall be watered, or non-toxic soil stabilizers shall be applied per manufacturer's recommendations, ~~three times daily~~ in sufficient quantities to maintain compliance with AQMD and jurisdictional requirements. ~~or non-toxic soil stabilizers shall be applied per manufacturer's recommendations at a frequency necessary to maintain no visible vehicle travel dust emissions.~~ □□Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered. □□Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet. □□Soil truck loads shall be covered and gate seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements. □□Construction activities that occur on unpaved surfaces shall be discontinued during periods ~~of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and~~ when ~~those~~ activities are causing visible dust plumes that cannot be mitigated by approved dust suppression methods. ~~All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule~~ □□Inactive excavated or graded soils and soil piles shall be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or shall be covered. □□Drop heights from excavators and loaders shall be minimized to a distance no more than 5 feet. □□Soil truck loads shall be covered and gate seals on dump trucks shall be tight when traveling on public roadways per California Vehicle Code §23114 requirements. □□Construction activities that occur on unpaved surfaces shall be discontinued during periods ~~of wind gusts exceeding 25 miles per hour, or when average wind speeds exceed 15 miles per hour, and~~ when ~~those~~ activities are causing visible dust plumes that cannot be mitigated by approved dust suppression methods. ~~All grading and excavation activities shall be suspended when wind speeds exceed 30 miles per hour. Wind speed measurement methods shall be consistent with the SCAQMD Implementation Handbook for Rule 403 and Rule 403.1.~~ ~~403.1.~~

D.3-28	The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;	To ensure that either watering, soil binders or other methods would be considered appropriate for dust suppression at these locations. Please make the following revision: The helicopter staging areas, that are not on existing paved airfields or other large paved sites, shall be treated with soil amendments (i.e watering, soil binders, etc.) that shall be applied at a frequency necessary to create and maintain surface soil crusts where rotor wash creates fugitive dust emissions;
BIOLOGICAL RESOURCES – VEGETATION		
D.4-3	One sensitive forbland community is found on the route. The *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is a seasonal community dominated by rancher's fiddleneck (*Amsinckia intermedia*) and numerous native and naturalized annual and perennial forbs and grasses. This alliance occupies upland slopes and valleys, and fallow fields with well-drained loamy soils. The *Amsinckia* Herbaceous Alliance has a Global and State Rarity ranking of G4/S4 (Sawyer et al., 2009), meaning that the community is at fairly low risk of extinction or elimination due to an extensive range or many populations or occurrences, but with possible cause for concern as a result of local recent declines, threats, or other factors. This commu-nity is found in one small area in the San Timoteo Badlands along Segment 3, near Mile Point (MP) 7.0.	The rarity rank of G4/S4 is not high enough to consider it as a significant impact. CDFW provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp) The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDB but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA. SCE recommends that the reference to this plant community be deleted. Based on The Manual of California Vegetation (Manual), 2nd edition, Amsinckia intermedia does not form an alliance. Rather, it is A. menziesii and A. tessellata that form the sensitive alliance. In the Remarks section the manual comments on other Amsinckia spp. but not A. intermedia. Further, the Alliance that has been reference has the following characteristics, based on the Manual: 1) A. menziesii and/or A. tessellata is seasonally co-dominant in the herbaceous layer 2) A. menziesii > 10% relative cover in herbacous layer or Vulpia bromoides co-dominates with A. menziesii and Plagiobothrys canescens. DEIR does not provide a valid reference as to why this species was included as independent plant community. Therefore, the plant community being described in the DEIR may not fall within this plant community alliance. A. intermedia does not form a sensitive forbland community based on the current and accepted CDFW sensitive plant community list. Suggested Revision: ~~One sensitive forbland community is found on the route. The *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is a seasonal community dominated by rancher's fiddleneck (*Amsinckia intermedia*) and numerous native and naturalized annual and perennial forbs and grasses. This alliance occupies upland slopes and valleys, and fallow fields with well-drained loamy soils. The *Amsinckia* Herbaceous Alliance has a Global and State Rarity ranking of G4/S4 (Sawyer et al., 2009), meaning that the community is at fairly low risk of extinction or elimination due to an extensive range or many populations or occurrences, but with possible cause for concern as a result of local recent declines, threats, or other factors. This commu-nity is found in one small area in the San Timoteo Badlands along Segment 3, near Mile Point (MP) 7.0.~~
D.4-6	Aeolian sand narrative	For Table D.4-1, Aeolian Sand is a habitat subclass within the Desert Scrub plant community and the narrative should address it as such.

D.4-7	Stabilized and partially stabilized desert dunes and sand fields are classified by CDFW as G4/S3 (CDFG, 2010), meaning that they are considered vulnerable and at moderate risk of extinction.	CDFG 2010 does not recognize and "stabilized and partially stabilized desert dune and sand fields." Further, the G4/S3 classification is reserved for plant communities. In addition, the reference being cited here is a list of sensitive plant communities. No plant communities are listed for what is being described as Aeolian sand habitat. Therefore, the DEIR/DEIS should not make the assertion that these dunes have been classified under CDFW rarity rankings. Furthermore, the DEIR/DEIS should not conclude that this dune habitat is sensitive based on the information provided. In addition, there are a number of dunes in California authorized for recreational purposes . Simply because Aeolian sand habitat is present does not automatically make it a sensitive resource unless a sensitive plant community also is present. Suggested Revision: ~~Stabilized and partially stabilized desert dunes and sand fields are classified by CDFW as G4/S3 (CDFG, 2010), meaning that they are considered vulnerable and at moderate risk of extinction.~~
D.4-8	Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations, depicts the locations of federal- and state-listed and state designated species of special concern that were observed during surveys conducted between 2011 and 2013.	Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations, depicts the locations of federal- and state-listed and state designated ~~species of special concern~~ rare plants that were observed during surveys conducted between 2011 and 2013.
D.4-9	***California Department of Fish and Wildlife Jurisdiction*** All of the potential USACE jurisdictional areas would also be considered CDFW jurisdictional. In addition, 196 drainages that did not meet the USACE nexus criteria, but showed evidence of a bed and bank (e.g., not categorized as swales) were also identified and are potentially subject to CDFW jurisdiction. Riparian vegetation, such as willows and mulefat, associated with these drainages is also potentially under CDFW jurisdiction.	As Morongo lands are not subject to the state's jurisdiction and SCE did not conduct a significant nexus determination, the following clarification is recommended: ***California Department of Fish and Wildlife Jurisdiction*** All of the potential USACE jurisdictional areas outside of those found on the Morongo Indian Reservation land would also be considered CDFW jurisdictional. ~~In addition, 196 drainages that did not meet the USACE nexus criteria, but showed evidence of a bed and bank (e.g., not categorized as swales) were also identified and are potentially subject to CDFW jurisdiction~~. Riparian vegetation, such as willows and mulefat, associated with these drainages is also potentially under CDFW jurisdiction.
D.4-9	***Regional Water Quality Control Board Jurisdiction*** Areas of potential Regional Water Quality Control Board (RWQCB) jurisdiction coincide with the identi-fied limits of potential USACE jurisdiction, per the September 2004 Workplan (SWRCB, 2004). These areas may be subject to RWQCB jurisdiction through provisions in the CWA. In addition, areas that are potentially subject to CDFW jurisdiction, but do not qualify as USACE jurisdic-tion (i.e., isolated areas with a bed and bank that do not connect to a TNW and isolated wetlands), may also be subject to RWQCB jurisdiction through Porter-Cologne. The drainages in the western half of the Proposed Project study area (Segments 1–4), which flow into the Santa Ana River, will be subject to jurisdiction by Region 8 (Santa Ana RWQCB) of the SWRCB. The drainages in the eastern part of the Proposed Project study area (Segments 4–6), which flow into the Salton Sea, are regulated by Region 7 (Colorado River RWQCB) of the SWRCB. This includes the depressional feature (Drainage 182B) on the reservation (Segment 5).The regional boundary within the Proposed Project study area is approximately the border (generally Highland Springs Avenue) between the cities of Beaumont and Banning in River-side County.	The Proposed Project crosses multiple Regional Board boundaries and tribal land and is subject to regulation under Section 401 by the SWRCB. SCE recommends the following changes:, ***State~~Regional~~ Water ~~Quality~~ Resources Control Board Jurisdiction*** The Proposed Project falls within the jurisdictional boundaries of the Santa Ana Regional Water Quality Control Board (RWQCB) in the western part of the project, and within the jurisdictional boundaries of the Colorado River RWQCB in the eastern part of the project. In situations where projects extend into multiple Regional Board boundaries, the project is subject to regulation by the SWRCB. Areas of potential ~~Regional Water Quality Control Board (RWQCB)~~ SWRCB jurisdiction coincide with the ~~identi-fied~~ limits of potential USACE jurisdiction, per the September 2004 Workplan (SWRCB, 2004). These areas may be subject to ~~RWQCB~~ SWRCB jurisdiction through provisions in the CWA. In addition, areas that are potentially subject to CDFW jurisdiction, but do not qualify as USACE ~~jurisdic-tion~~ jurisdiction (i.e., isolated areas with a bed and bank that do not connect to a TNW and isolated wetlands), may also be subject to ~~RWQCB~~ SWRCB jurisdiction through Porter-Cologne. ~~The drainages in the western half of the Proposed Project study area (Segments 1–4), which flow into the Santa Ana River, will be subject to jurisdiction by Region 8 (Santa Ana RWQCB) of the SWRCB. The drainages in the eastern part of the Proposed Project study area (Segments 4–6), which flow into the Salton Sea, are regulated by Region 7 (Colorado River RWQCB) of the SWRCB. This includes the depressional feature (Drainage 182B) on the reservation (Segment 5).The regional boundary within the Proposed Project study area is approximately the border (generally Highland Springs Avenue) between the cities of Beaumont and Banning in River-side County.~~ Additionally,

		project areas that fall within the Morongo Indian Reservation are not subject to regulation by the SWRCB. Regulation under Section 401 of the Clean Water Act is under the jurisdiction of the U.S. Environmental Protection Agency (EPA).
D.4.12	**Devers Staging Yard (Segment 6; Riverside County, CV-MSHCP).** Use of the area may result in impacts to disturbed desert scrub (up to 10.0 acres) within the staging yard which could support special-status plant species. No sensitive vegetation communities are present within the disturbance areas. Potential jurisdictional drainage features are present and would be impacted by construction and use of the stag-ing yard.	Please make the following revision: **Devers Staging Yard (Segment 6; Riverside County, CV-MSHCP).** The Devers Staging Yard is an existing staging yard.~~Use of the area may result in impacts to disturbed desert scrub (up to 10.0 acres) within the staging yard which could support special-status plant species~~. No sensitive vegetation communities are present within the disturbance areas. Potential jurisdictional drainage features are present and would be impacted by construction and use of the stag-ing yard.
D.4-14	Five sensitive vegetation communities are found on Segment 3 (see Section D.4.1.1, Vegetation): • *Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is found in one small area in the Badlands near MP 7.0.	For consistency with the same comment as 4-3, please remove *Amsinckia* Herbaceous Alliance (Fiddleneck Fields): Four ~~Five~~ sensitive vegetation communities are found on Segment 3 (see Section D.4.1.1, Vegetation): • ~~*Amsinckia* Herbaceous Alliance (Fiddleneck Fields) is found in one small area in the Badlands near MP 7.0.~~
D.4 -16	**Special-status Plants** One special-status species, chaparral sand-verbena (Abronia villosa var. aurita), has a high potential to occur in Segment 4 and four additional special-status species were observed during surveys: Yucaipa onion (Allium marvinii), Plummer's mariposa-lily, smooth tarplant, and Engelmann oak (Quercus engelmannii). Please see Table Ap.7-1 and Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations (Appendix 7). Several special-status plant species have a low or moderate potential to occur within Segment 4, including Nevin's barberry and Mojave tarplant.	Please remove the incorrect reference to smooth tarplant as the Botanical Surveys in 2012 and 2013 did not find that species on Segment 4: **Special-status Plants** One special-status species, chaparral sand-verbena (*Abronia villosa* var. *aurita*), has a high potential to occur in Segment 4 and ~~four~~ three additional special-status species were observed during surveys: Yucaipa onion (*Allium marvinii*), Plummer's mariposa-lily, ~~smooth tarplant,~~ and Engelmann oak (*Quercus engelmannii*). Please see Table Ap.7-1 and Figures Ap.7-3a through Ap.7-3k, Special-status Species Observations (Appendix 7). Several special-status plant species have a low or moderate potential to occur within Segment 4, including Nevin's barberry and Mojave tarplant.
D.4-16	**D.4.1.2.4 Segment 4: Beaumont and Banning** Segment 4 is approximately 12.0 miles long and extends from the El Casco Substation east to the west-ern edge of the Morongo Indian reservation at San Gorgonio Avenue in the City of Banning; see Figure B-5a, Proposed Transmission Line Route – Segment 4. The entire segment is within Riverside County and within the WR-MSHCP plan area. No part of Segment 4 is covered by the CV-MSHCP, nor is it on BLM or reservation lands; see Figures Ap.7-1a through Ap.7-1k, Land Management and Critical Habitat Areas (in Appendix 7).	There is a parcel of Morongo Indian Reservation Land that the ROW Crosses west of Sunset in Banning. Revise the segment description for consistency and update Fig. Ap. 7-1a-1k accordingly: **D.4.1.2.4 Segment 4: Beaumont and Banning** Segment 4 is approximately 12.0 miles long and extends from the El Casco Substation east to the western edge of the Morongo Indian reservation at San Gorgonio Avenue in the City of Banning; see Figure B-5a, Proposed Transmission Line Route – Segment 4. The entire segment is within Riverside County and within the WR-MSHCP plan area. The ROW crosses a parcel of Morongo Indian Reservation Land west of Sunset Avenue in Banning. No part of Segment 4 is covered by the CV-MSHCP, nor is it on BLM ~~or reservation~~ lands; see Figures Ap.7-1a through Ap.7-1k, Land Management and Critical Habitat Areas (in Appendix 7).
D.4-19	Three sensitive vegetation communities and habitat types are found on Segment 6 (Section D.4.1.1): □□*Lepidospartum squamatum* Shrubland Alliance (Scalebroom Scrub) is found along the Whitewater River and several smaller washes. □□*Ericameria paniculata* Shrubland Alliance (Black-stem Rabbitbrush Scrub) is found in a small area near Devers Substation. □□Aeolian (wind-blown) sand habitat is found east of the Whitewater River and in the Whitewater River wash.	For consistency with the same comment as 4-7, please delete Aeolian (wind-blown) sand habitat as a sensitive vegetation community: ~~Three~~ Two sensitive vegetation communities and habitat types are found on Segment 6 (Section D.4.1.1): □□*Lepidospartum squamatum* Shrubland Alliance (Scalebroom Scrub) is found along the Whitewater River and several smaller washes. □□*Ericameria paniculata* Shrubland Alliance (Black-stem Rabbitbrush Scrub) is found in a small area near Devers Substation. □□~~Aeolian (wind-blown) sand habitat is found east of the Whitewater River and in the Whitewater River wash.~~ .
D.4-20	Examples of sensitive habitats in this area are aeolian sand (described in Section D.4.1.1), including active desert dunes and partially stabilized desert dunes, and desert dry wash woodland.	For consistency with the same comment as 4-7, please make the following revision: Examples of sensitive habitats in this area are ~~aeolian sand (described in Section D.4.1.1), including active desert dunes and partially stabilized desert dunes, and~~ desert dry wash woodland.

D.4-20	***Wetlands and other waters.*** There are numerous dry (episodic or ephemeral) washes and channels here. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, and RWQCB jurisdiction.	Please make the following revision: ***Wetlands and other waters.*** There are numerous dry (episodic or ephemeral) washes and channels here. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, SWRCB and ~~RWQCB~~ EPA jurisdiction.
D.4-21	***Wetlands and other waters*.** The Colorado River is located east of Blythe. The river itself is considered waters of the state and waters of the U.S. Riparian and wetland vegetation, wash habitat, and irrigation or drainage canals along the river, its floodplain, and its tributary washes also may meet jurisdictional criteria. Further to the west, outside the agricultural areas, there are numerous dry (episodic or ephem-eral) washes and channels. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, and RWQCB jurisdiction. Irrigation channels and stock ponds may be found within the agricultural areas; depending on the situation these may also be jurisdictional.	There are no proposed impacts to any waters within the Colorado River watershed. SCE recommends that this section be deleted , however if this section should remain, please make the following revision: ***Wetlands and other waters*.** The Colorado River is located east of Blythe. The river itself is considered waters of the state and waters of the U.S. Riparian and wetland vegetation, wash habitat, and irrigation or drainage canals along the river, its floodplain, and its tributary washes also may meet jurisdictional criteria. Further to the west, outside the agricultural areas, there are numerous dry (episodic or ephem-eral) washes and channels. These washes rarely carry surface flow except during rainstorms or during floods originating from heavy precipitation higher in the watershed. As described in Section D.4.1.1, under the federal Clean Water Act and State Fish and Game Code, these channels may be subject to USACE, CDFW, SWRCB and ~~RWQCB~~ EPA jurisdiction. Irrigation channels and stock ponds may be found within the agricultural areas; depending on the situation these may also be jurisdictional.
D.4-21	**Clean Water Act (33 USC Sections 1251-1376).** Regulates the chemical, physical, and biological integrity of the nation's waters. Section 401 of the Clean Water Act (CWA) requires that an applicant obtain State certification for discharge into waters of the United States. The Regional Water Quality Control Boards administer the certification program in California. Section 404 of the CWA establishes a permit program, administered by the U.S. Army Corps of Engineers (USACE), to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Individual projects may qualify under "Nationwide General Permits," or may require project-specific "Individual Permits."	Please make the following revision: **Clean Water Act (33 USC Sections 1251-1376).** Regulates the chemical, physical, and biological integrity of the nation's waters. Section 401 of the Clean Water Act (CWA) requires that an applicant obtain State certification for discharge into waters of the United States. The State Water Resources Control Board and Regional Water Quality Control Boards administer the certification program in California, and the EPA administers the certification program on sovereign tribal land. Section 404 of the CWA establishes a permit program, administered by the U.S. Army Corps of Engineers (USACE), to regulate the discharge of dredged or fill material into waters of the United States, including wetlands. Individual projects may qualify under "Nationwide General Permits," or may require project-specific "Individual Permits."
D.4-23	**D.4.3.1 Approach to Impact Assessment** The Proposed Project includes a construction phase, projected to take place over approximately 36 to 48 months. Following construction, temporary disturbance areas would be revegetated according to applic-able mitigation measures. Revegetation efforts, along with implementation and monitoring of other mit-igation measures identified herein, would necessitate ongoing vehicle access and soil disturbance beyond the completion of construction. This phase is referred to as the Proposed Project's "restoration" phase in the following analysis. Additionally, vehicle access and other project activities would continue during operation and mainte-nance (O&M), throughout the life of the Proposed Project. Each potential impact to vegetation is described, to indicate whether it is a direct or indirect impact; whether its effects would be permanent, long-term or short-term; and whether it would occur during one or more of the Proposed Project's phases, including construction, restoration, or O&M.	The Draft EIR/EIS should state that O&M associated with the Proposed Project would be less than or at most equivalent to O&M to the existing facilities in this section. As such, these are not new impacts as compared to existing conditions.
D.4-24	**D.4.3.1.1 Applicant Proposed Measures** The PEA includes a series of Applicant Proposed Measures (APMs) proposed by SCE to reduce or avoid impacts to biological resources. The APMs are considered to be commitments made by SCE, and they are assumed to be implemented in this evaluation of impacts to biological resources. SCE's APMs addressing vegetation and special-status plants are presented in Table D.4-3. APMs that relate strictly to wildlife are presented in Section D.5. The additional mitigation measures recommended in this analysis generally incorporate the APMs, while adding conditions or details to protect resources	The quoted text, below, needs clarification, it is not the objective of CEQA or NEPA to protect resources to the extent feasible. Rather, in the case of CEQA significant impacts must be mitigated to below a level of significance, unless the Lead Agency provides a Statement of Overriding Consideration. The additional mitigation measures recommended in this analysis generally incorporate the APMs, while adding conditions or details to protect resources to the extent feasible.

	to the extent feasible. Therefore, the APMs in Table D.4-3 are superseded by mitigation measures provided.	
D.4-26	**Jurisdictional Water Permits.** Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, and the appropriate Regional Water Quality Control Boards in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits. The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, CDFW, and the Regional Boards as appropriate. The plan would describe measures to accomplish restoration, provide criteria for restoration success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE and CDFW. Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP [Determination of Biologically Equivalent or Superior Preservation] that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.	Please make the following revisions: **Jurisdictional Water Permits** Jurisdictional waters permits would be obtained from CDFW under Cal. Fish & Game Code Section 1602, and from USACE, EPA, and the ~~appropriate Regional Water Quality Control Boards~~ State Water Resources Control Board in accordance with Sections 404 and 401 of the Clean Water Act, to address unavoidable impacts to State and Federal jurisdictional waters. Impacts would be mitigated based on the terms of the permits. The applicant would develop a Habitat Mitigation and Monitoring Plan (HMMP) for affected jurisdictional areas within established riparian areas, as needed, for review and approval by the USACE, EPA, CDFW, and the SWRCB ~~Regional Boards~~ as appropriate. The plan would describe measures to accomplish restoration or revegetation, provide criteria for ~~restoration~~ success, and specify compensation ratios. Monitoring and reporting requirements and the duration of post-construction monitoring would be specified. A copy of the final HMMP would be provided to the CPUC, USACE, EPA and CDFW. Regarding any affected Riparian/Riverine drainages and habitat areas in Segments 3 and 4 in Western Riverside County, if SCE participates in the WR-MSHCP, SCE would prepare a DBESP [Determination of Biologically Equivalent or Superior Preservation] that would include mitigation measures consistent with the HMMP as previously described. The RCA would request USFWS and CDFW concurrence with the MSHCP "findings of consistency," as well as DBESP approval. Subsequent coordination on any biological issues would be addressed through consultation with the RCA. The RCA would determine the need for additional consultation with the USFWS and CDFW.
D.4-29	The Proposed Project also would affect wetland or riparian habitat, vegetation and habitat that may support special-status plants or animals, and vegetation types designated by CDFW (CDFG, 2010) as "communities with highest inventory priority." These habitats include alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, desert scrub, riparian woodland, aeolian sand, and grassland/forbland potentially supporting Stephens' kangaroo rat, or native grasslands (i.e., grassland/forbland with 10 percent or greater relative cover of native perennial grasses).	Chaparral and desert scrub are not considered sensitive plant communities. CDFW provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp) The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDB but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA. If these plant communities are included due to their value as special-status species habitat, mitigation should only apply to locations where specific special-status species are known to occur. Chaparral, Desert Scrub, and Aeolian Sand should be deleted because they are not by themselves sensitive vegetation communities and specific special- status species known to occur in these communities along the ROW are not clearly identified: The Proposed Project also would affect wetland or riparian habitat, vegetation and habitat that may support special-status plants or animals, and vegetation types designated by CDFW (CDFG, 2010) as "communities with highest inventory priority." These habitats include alluvial scrub, coast live oak woodland, coastal sage scrub, ~~chaparral, desert scrub~~, riparian woodland,

		~~aeolian sand~~, and grassland/forbland potentially supporting Stephens' kangaroo rat, or native grasslands (i.e., grassland/forbland with 10 percent or greater relative cover of native perennial grasses).
D.4-29	***Mitigation Measures for Impact VEG-1: Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats.*** **VEG-1a Conduct biological monitoring and reporting.** The following provisions shall apply to the approved project. **Lead biologist:** SCE shall nominate a lead biologist and submit the nominee's resume to the CPUC and BLM for concurrence, no less than 60 days prior to the start of any ground-disturbing activities, including those occurring prior to site mobilization (including, but not limited to geotechnical borings or hazardous waste evaluations). At minimum the lead biologist will hold a bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field; have at least three years of experience in field biology and at least one year of direct field experience with biological resources found in or near the project area. The resume shall demonstrate to the satisfaction of the CPUC and BLM the appropriate education and experience to accomplish the assigned biological resources tasks. The lead biologist will be SCE's primary point of contact to CPUC, BLM, CDFW, and USFWS regarding any biological resources issues and implementation of related mitigation mea-sures and permit conditions throughout project construction and post-construction restoration work. In addition, the lead biologist will be responsible for supervising and training biological monitors (below), and preparing and submitting all monitoring reports and notifications (below). If the lead biologist is replaced, the specified information of the proposed replacement must be submitted to the CPUC and BLM at least ten working days prior to the termination or release of the preceding lead biologist. In an emergency, SCE shall immediately notify the CPUC and BLM to discuss the qualifications and approval of a short-term replacement while a permanent lead biologist is proposed for consideration. **Biological monitors:** SCE shall assign qualified biological monitors to the project to monitor all work activities during the construction phase. Monitors are responsible for ensuring that impacts to special-status species, native vegeta-tion, wildlife habitat, and sensitive or unique biological resources are avoided to the fullest extent safely possible. Monitors are also responsible to ensure that work activities are con-ducted in compliance with APMs, mitigation measures, permit conditions, and other project requirements. Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demon-	SCE's existing team structure includes a staff Project Lead Biologist assigned to the project. The Project Lead Biologist manages the entire biology field team, is familiar with the biological resources in the project area, and would be the primary point of contact to CPUC, BLM, CDFW, and USFWS staff; thus, therefore there is no reason to "nominate" a lead biologist as indicated in the measure. The Project Lead Biologist, in compliance with the Biological Opinion, will designate a Field Contact Representative (FCR) who will additionally be responsible for compliance with project mitigation measures, field monitors, and conservation measures outlined in the Biological Opinion. The Authorized or Qualified Biologist may also serve as the FCR, and the resumes of the FCR will be submitted to the agencies for approval. Additionally, this measure does not acknowledge the existing O&M activities occurring along the WOD project ROW. The maintenance currently occurring on the existing lines is greater than or at most equal to the maintenance that will be required for the WOD project. Due to this existing baseline environmental condition, the proposed O&M vegetation and habitat removal impacts would be less than significant without this mitigation measure following construction of the WOD Project. Lastly, pre-construction activities such as geotechnical investigation and hazardous waste evaluations do not create the same level of impacts as construction activity. Further, a FCR may not be in place during preconstruction activities. As such, a requirement to have a Lead Biologist – or a Field Contact Representative - approved prior to conducing these activities is not necessary as long as SCE avoids impacts to biological resources. For the reasons stated above, please make the following revisions: ***Mitigation Measures for Impact VEG-1: Land clearing for construction ~~and future operations and maintenance~~ would cause loss or degradation of vegetation and habitat, including sensitive habitats.*** **VEG-1a Conduct biological monitoring and reporting.** The following provisions shall apply to the approved project. ~~**Lead biologist:** SCE shall nominate a lead biologist and submit the nominee's resume to the CPUC and BLM for concurrence, no less than 60 days prior to the start of any ground-disturbing activities. , including those occurring prior to site mobilization (including, but not limited to geotechnical borings or hazardous waste evaluations). At minimum the lead biologist will hold a bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field; have at least three years of experience in field biology and at least one year of direct field experience with biological resources found in or near the project area. The resume shall demonstrate to the satisfaction of the CPUC and BLM the appropriate education and experience to accomplish the assigned biological resources tasks.~~ SCE's ~~The~~ lead biologist will be SCE's primary point of contact to CPUC, BLM, CDFW, and USFWS regarding any biological resources issues and implementation of related mitigation mea-sures and permit conditions throughout project construction and post-construction restora-tion work. In addition, the lead biologist will ~~be responsible~~ have oversight of ~~for~~ supervising and of training bio-logical monitors (below), and preparing and submitting all monitoring reports and notifica-tions (below). ~~If the lead biologist is replaced, the specified information of the proposed replacement must be submitted to the CPUC and BLM at least ten working days prior to the termination or release of the preceding lead biologist. In an emergency, SCE shall immediately notify the CPUC and BLM to discuss the qualifications and approval of a short-term replacement while a permanent lead biologist is proposed for consideration.~~

	strate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks. SCE shall provide training to biological monitors, in addition to WEAP (see Mitigation Measure VEG-1b) and prior to the monitor commencing field duties, on biological resources present or potentially present on the Proposed Project, as well as mitigation measures, permit requirements, project protocols, and the duties and responsibilities of a biological monitor. Biological monitors shall inform construction crews daily of any environmentally sensitive areas (ESAs), nest buffers, or other resource issues or restrictions that affect the work sites for that day. Biological monitors shall communicate with construction supervisors and crews as needed (e.g., at daily tailgate safety meetings ("tailboards"), by telephone, text message, or email) to provide guidance to maintain compliance with mitigation measures and permit conditions. SCE shall ensure that adequate numbers of monitors are assigned to effectively monitor work activities and that communications from biological monitors are promptly directed to crews at each work site for incorporation into daily work activities. If biological monitors are unavailable for a tailboard meeting, the construction supervisors shall communicate all ESA, nest buffers, or other resource restrictions to crews during the meeting. SCE shall ensure that biological monitors are provided with an accurate daily construction work schedule as well as updated information on any alterations to the daily construction work schedule. This information shall also be provided to CPUC monitors. SCE shall ensure that biological monitors are provided with up-to-date biological resource maps and construction maps in hardcopy or digital format. These maps shall also be provided to CPUC monitors. Monitors shall be familiar with the biological resources present or potentially present, ESAs, nest buffers, and any other resource issues at the site(s) they are monitoring, as well as the applicable mitigation measures and permit requirements. Monitors shall exhibit diligence in □□**Final report:** After construction has been completed, a final environmental compliance monitoring report shall be submitted to the CPUC and BLM for review and approval. This report shall be submitted within twelve (12) months of the completion of construction and shall include: – A summary of all non-compliance records occurring during the construction phase, and remedial actions applied for each one, with additional explanatory text and explanation of resolution of each substantial non-compliance incident (often termed "Level 3 non-compliance"); – A summary of all nest buffer incursions, including helicopter incursions, (see Mitigation Measure WIL-1c) occurring during the construction phase, with explanation of follow-up actions and resolution for each one; – Final compilations of permanent and temporary impact acreages by habitat and land use jurisdiction; – Summaries of all other monitoring reporting requirements, as specified in mitigation measures in the Vegetation and Wildlife Resources sections; and – Discussion of "lessons learned" during construction, and recommended or proposed measures to improve compliance for future projects.	**Biological monitors:** SCE shall assign qualified biological monitors to the project to monitor ~~all~~ work activities, where special status plant and wildlife, sensitive vegetation communities, special status species habitat and other regulated biological resources have the potential to occur, during the construction phase. Monitors are responsible for ensuring that impacts to special-status species, sensitive ~~native~~ vegeta-tion communities, special-status species ~~wildlife~~ habitat, and sensitive or unique biological resources are avoided or minimized to the fullest extent safely possible. Monitors are also responsible to ensure that work activities are con-ducted in compliance with APMs, mitigation measures, permit conditions, and other project requirements. Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demon-strate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks. SCE shall provide training to biological monitors, in addition to WEAP (see Mitigation Mea-sure VEG-1b) and prior to the monitor commencing field duties, on biological resources pres-ent or potentially present on the Proposed Project, as well as mitigation measures, permit requirements, project protocols, and the duties and responsibilities of a biological monitor. Biological monitors shall inform construction crews daily of any environmentally sensitive areas (ESAs), nest buffers, or other resource issues or restrictions that affect the work sites for that day. Biological monitors shall communicate with construction supervisors and crews as needed (e.g., at daily tailgate safety meetings ("tailboards"), by telephone, text message, or email) to provide guidance to maintain compliance with mitigation measures and permit conditions. SCE shall ensure that adequate numbers of monitors are assigned to effectively monitor work activities and that communications from biological monitors are promptly directed to crews at each work site for incorporation into daily work activities. If biological monitors are unavailable for a tailboard meeting, the construction supervisors shall commu-nicate all ESA, nest buffers, or other resource restrictions to crews during the meeting. SCE shall ensure that biological monitors are provided with an accurate daily construction work schedule as well as updated information on any alterations to the daily construction work schedule. This information shall also be provided to CPUC monitors. SCE shall ensure that biological monitors are provided with up-to-date biological resource maps and construction maps in hardcopy or digital format. These maps shall also be provided to CPUC monitors. Monitors shall be familiar with the biological resources present or potentially present, ESAs, nest buffers, and any other resource issues at the site(s) they are monitoring, as well as the applicable mitigation measures and permit requirements. Monitors shall exhibit diligence in □□**Final report:** After construction has been completed, a final environmental compliance monitoring report shall be submitted to the CPUC and BLM for review and approval. This report shall be submitted within twelve (12) months of the completion of construction and shall include: – A summary of all non-compliance records occurring during the construction phase, and remedial actions applied for each one, with additional explanatory text and explanation of resolution of each substantial non-compliance incident (often termed "Level 3 non-compliance"); – A summary of all nest buffer incursions, including helicopter incursions, (see Mitigation Measure WIL-1c) occurring during the construction phase, with explanation of follow-up actions and resolution for each one;

	Implementation locations: San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).	– Final compilations of permanent and temporary impact acreages by habitat and land use jurisdiction; – Summaries of all other monitoring reporting requirements, as specified in mitigation measures in the Vegetation and Wildlife Resources sections; and – Discussion of "lessons learned" during construction, and recommended or proposed measures to improve compliance for future projects. **Implementation locations:** San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).
D.4-31	Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.	Following Clarification Requested: • SCE Requests to be informed of the duration of the anticipated review period for resumes in order to schedule and retain qualified monitors prior to initiating work for work scheduling purposes. • Last sentence of this section is very subjective and we request additional detail. Suggested Revision: Resumes of all biological monitors, including specialty monitors (including but not limited to bat, nesting bird, and special-status species monitors), shall be provided for concurrence by the CPUC and BLM, prior to the monitor commencing field duties. CPUC and BLM, or their designee, will provide concurrence within 10 working days following submittal of resumes. The resumes shall demonstrate, to the satisfaction of the CPUC and BLM, the appropriate education and experience to accomplish the assigned biological resources tasks.
D.4-31	**Biological monitor duties and responsibilities:** Throughout the duration of construction, SCE shall conduct biological monitoring of all work activities in the project area, including work sites, yards, staging areas, access roads, and any area subject to project disturbance. All pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.) and post-construction restoration shall also be monitored by a biological monitor.	To ensure implementation for this portion of the mitigation measure is achievable, please include clarification related to the following: • SCE Requests clarification that not "all" work activities would require monitoring, rather, monitoring would be required where work activities have the potential to impact special-status biological resources. • Pre-construction Additionally, please make the following revision**:** **Biological monitor duties and responsibilities:** Throughout the duration of construction, SCE shall conduct biological monitoring of ~~all~~ work activities in the project area, including work sites, yards, staging areas, access roads, and any area subject to project disturbance, where there is a potential to impact impact sensitive plant or wildlife resources. ~~All pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.) and~~ Post-construction restoration shall also be monitored by a biological monitor in specific locations where restoration activities have the potential to impact sensitive plant or wildlife resources.
D.4-35	• Printed training materials, including photographs and brief descriptions of all special-status plants and animals that may be encountered on the project, including behavior, ecology, sensitivity to human activities, legal protection, penalties for violations, reporting requirements, and protection measures.	With the widespread availability of portable electronic devices, providing an option for distributing electronic copies will save resources. As such, please make the following revision: • Printed or electronic copies of training materials, including photographs and brief descriptions of all special-status plants and animals that may be encountered on the project, including behavior, ecology, sensitivity to human activities, legal protection, penalties for violations, reporting requirements, and protection measures.

D.4-37	For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall be responsible for a one-time replacement. If a second event occurs, no replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).	SCE should not be held responsible for events that are beyond SCE's control. ~~act's of God.~~ In the event of a fire, flood, or other disturbance the site conditions within the temporary impact areas may be no different than the surround vegetation. This statement assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas but provides no evidence to support this assumption. Suggested Revision: For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall not be responsible for replacement. N~~o~~o replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency).
D.4-37	On completion of project construction, SCE shall provide CPUC and BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, up to date ortho-rectified aerial imagery of the project area, and summary data of all discrepancies between final engineer-ing and "as-built" conditions for each vegetation or habitat type, within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM).	Providing updated ortho-rectified aerial imagery is an unnecessary additional expense. Current aerial imagery is readily available from various sources and is accurate. The provided GIS files should be sufficient to validate the actual vs. temporary impact areas. Please make the following revision: On completion of project construction, SCE shall provide CPUC and BLM with GIS shapefiles of all actual temporary and permanent disturbance areas, ~~up to date ortho-rectified aerial imagery of the project area,~~ and summary data of all discrepancies between final engineering and "as-built" conditions for each vegetation or habitat type, within each jurisdictional area (San Bernardino County, WR-MSHCP, CV-MSHCP, reservation, and BLM).
D.4-37 through 39	**VEG-1d Restore or revegetate temporary disturbance areas.** [Supersedes APM BIO-1 to provide further specificity.] This measure has two parts: Part A and Part B. Part A is applicable to all temporary disturbance areas, and Part B is applicable to disturbance occurring in sensitive vegetation types and special-status species habitats. For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall be responsible for a one-time replacement. If a second event occurs, no replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency). **Part A: Habitat restoration and revegetation for all temporary disturbance areas.** SCE shall prepare and implement a Habitat Restoration and Revegetation Plan (HRRP), to restore or revegetate all temporary disturbance areas, including temporary disturbance areas around tower construction sites, laydown or staging areas, temporary access and spur roads, cut and fill slopes, and locations of existing towers that are removed during construc-tion of the project. For temporary disturbances in agriculture, developed/disturbed, and most grassland/forbland (excluding suitable Stephens' kangaroo rat habitat and any areas with 10 percent or greater relative cover of native perennial grass species), the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion. The goals for sensitive vegetation and special-status species habitat are described in Part B of this Mit-igation Measure.	Included below are concerns related to VEG-1d and suggested revisions: **Paragraph 2:** In the event of a fire, flood, or other disturbance beyond the control of SCE, the site conditions within the temporary impact areas may be similar to those of the surrounding vegetation. The DEIR/DEIS assumes that surrounding native vegetation will respond better to fire, flood, or other disturbance than restoration areas, but provides no evidence to support this assumption. **Paragraph 3:** "Long-term restoration sites," that cannot be effectively revegetated or restored within the 5-year timeframe will need to be stabilized to prevent the potential for soil erosion. An additional sentence to account for this has been included. **Paragraph 13:** If SCE elects to take remedial action to ensure that success criteria are met within the 5 year period, SCE should not be penalized by being obligated to continue monitoring for another 5 years from the point of remedial action. SCE has an incentive to meet success criteria within the 5-year period and resetting the period would diminish the incentive. SCE recommends deletion of last sentence. **Part B, Paragraph 1:** See comments in 4-7. SCE recommends deleting aeolian, sand, chaparral, and desert scrub Aeolian sand, as they are not sensitive vegetation communities. CDFW provides background information regarding its List of Natural Communities for the State and presents some specific information regarding the codes it uses as well as Rarity ranking and global and State ranks for natural communities of interest. (Please see: http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp)

	The Draft HRRP shall be submitted to CPUC and BLM review and approval prior to the beginning of ground-disturbing activities. SCE shall incorporate all requested revisions in coordination with the CPUC and BLM and finalize the HRRP within 12 months from the start of construction. For all temporary disturbance areas, the HRRP shall include the following elements: □□A statement of revegetation goals and objectives for each portion of the project area, based on vegetation type and jurisdictional status of each site. □□Quantitative success criteria for each revegetation or restoration site or category. □□Implementation details, including but not limited to topsoil stockpiling and handling; post-construction site preparation; soil decompaction and recontouring; planting and seeding palettes to include only native, locally sourced materials with confirmed availability from suppliers; fall-season planting or seeding dates. □□Maintenance, including but not limited to irrigation or hand-watering schedule and equip-ment, erosion control, and weed control. □□Monitoring and Reporting, specifying monitoring schedule and data collection methods throughout establishment of vegetation with key indicators of successful or unsuccessful progress, and quantitative values to objectively determine success or failure at the conclusion of the monitoring period. □□Contingency measures such as re-planting, drainage repairs, adjustments to irrigation or weeding schedule, and extension of maintenance beyond the original schedule, to repair or remediate sites not on track to meet success criteria, or not meeting the criteria at the close of the originally scheduled monitoring period. The Integrated Weed Management Plan (Mitigation Measure VEG-2a) will be implemented throughout implementation of the HRRP. For all revegetation or restoration areas, only seed or potted nursery stock of locally occurring native species from a local source will be used for revegetation. Seeding and planting will be conducted as described in Chapter 5 of *Rehabilitation of Disturbed Lands in California* (Newton and Claassen, 2003). The list of plants observed during botanical surveys of the project area will be used as a guide to site-specific plant selection. For all revegetation or restoration areas, the HRRP will include objective, quantifiable success criteria, commensurate with the goals for each site. Monitoring of the reclamation, revegetation, or restoration sites will continue annually for no fewer than five (5) years or until the defined success criteria are achieved, whichever is later. SCE will be responsible for implementing remediation measures as needed. Following remediation work, each site will be subject to the success criteria and monitoring period as required for the initial reclama-tion, revegetation, or restoration. **Part B: Additional habitat restoration and revegetation requirements for sensitive vegeta-tion and special-status species habitat.** For temporary disturbances in grassland/forbland that is either suitable Stephens' kangaroo rat habitat, or has 10 percent or greater relative cover of native perennial grass species (see VEG-1c), and in all other vegetation types (alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, desert scrub, riparian woodland, and aeolian sand), the Habitat Resto-ration and Revegetation Plan will be	The information stipulates that: "For alliances with State ranks of S1-S3, all associations within them are also considered to be highly imperiled." It also specifies that analysts should "Refer to the current standard list of natural communities to determine if any of these types are considered of special concern (S1-S3 rank); if so, the CEQA Guidelines checklist (at IVb) should be considered." Communities ranked S4 or S5 are not included in this specification and are not mentioned regarding sensitivity. Thus, it should be understood that they may be of interest to the State and recognized by the CNDDB but communities ranked S4 or S5 are not considered imperiled to the extent that impacts to them warrant consideration as significant under CEQA. These vegetation communities have the potential to support sensitive wildlife species, however, only those habitats that are occupied require restoration for temporary impacts and compensation for permanent impacts to mitigate significant impacts. **Part B, Performance Standard Bullets:** Because this part of the MM seems to apply to grassland habitat considered suitable for SKR and other sensitive plant communities, SCE is requesting modifications to the MM, as described below. In the project area, some of the plant communities listed do not naturally exhibit 80% relative cover by native species. For example, desert and alluvial areas have a low absolute cover of native species due to large areas of bare ground. Further, many of California's ecosystems are highly invaded, resulting in naturally occurring communities that have less than 80% relative cover of native species. Therefore, the goals for total or absolute as well as native cover should be based on both the absolute and relative coverage attributed to the existing plant communities being replaced. Setting a standard at 80% native species could mean that SCE's restoration efforts must achieve coverage levels that exceed existing values in the on-site or adjacent plant communities. In addition, cover and density measure the same thing; so the references to both is confusing. SCE recommends using only cover or density in the MM. Requiring that all restoration sites must persist for at least 3 years without irrigation before monitoring is complete is excessive and inconsistent with the two year standard requirement typically established by the resource agencies. SCE recommends a two year requirement. Although some grassland/forbland habitat may be considered potentially suitable for Stephens' kangaroo rat, the habitat is not occupied by that species unless that species is present. If the habitat is not occupied, then the plant community is not sensitive nor does it support special status species (SKR). Requiring revegetation of this non-sensitive, predominantly ruderal plant community should not be required, unless the temporary loss is considered significant. Establishing performance standards and a 5-year monitoring requirement for a non-native grassland should not be required, as this vegetation rapidly becomes reestablished by itself following construction activities. SCE suggests replacing "suitable habitat" for SKR with "occupied habitat" for SKR. For the reasons stated abov,e please make the following revisions: **VEG-1d Restore or revegetate temporary disturbance areas.** [Supersedes APM BIO-1 to provide further specificity.] This measure has two parts: Part A and Part B. Part A is applicable to all temporary disturbance areas, and Part B is applicable to disturbance occurring in sensitive vegetation types and special-status species habitats. For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall <u>not</u> be responsible for ~~a one-time~~ replacement. ~~If a~~

	designed to replace the habitat values present prior to disturbance (i.e., native plant species cover, habitat structure, and soil or substrate condi-tions). The following performance standards must be met by the end of the monitoring period: □□At least 80 percent of the vegetation cover within the restoration area shall be native spe-cies that naturally occur in local native habitats; □□Absolute cover and density of native plant species within the restoration areas shall equal at least 60 percent of the pre-disturbance or reference vegetation cover; and □□The site shall have persisted successfully without irrigation or remedial planting for a min-imum of three years prior to completion of monitoring. For revegetation or restoration in these habitats, the HRRP will include (in addition to the components listed in Part A): □□A map depicting the locations of all temporary disturbance areas in these habitats, includ-ing a quantitative evaluation of native grass cover and Stephens' kangaroo rat habitat suitability in all mapped grassland/forbland areas, subject to requirements of Part B; □□An inventory of any temporary disturbance areas that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe (these will be cate-gorized as "long-term disturbance areas," to be addressed under habitat compensation, Mitigation Measure VEG-1e). **Reporting (for Part A and Part B).** For all revegetation or restoration areas, SCE will provide annual reports to the CPUC and BLM verifying the total vegetation acreage subject to tem-porary and permanent disturbance, identifying which items of the HRRP have been com-pleted, and which items are still outstanding. The annual reports will also include a summary of the reclamation, revegetation, or restoration activities for the year, a discussion of whether performance standards for the year were met, any remedial actions conducted and recommendations for remedial action, if warranted, that are planned for the upcoming year. Each annual report will be submitted within 90 days after completion of each year of revegetation and restoration work. **Implementation locations:** Parts A and B of this mitigation measure shall apply as follows: San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reserva-tion (recommended for all Morongo Tribal Lands).	~~second event occurs, a~~ No replanting is required, unless the event is caused by SCE's activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency). **Part A: Habitat restoration and revegetation for all temporary disturbance areas.** SCE shall prepare and implement a Habitat Restoration and Revegetation Plan (HRRP), to restore or revegetate all temporary disturbance areas, including temporary disturbance areas around tower construction sites, laydown or staging areas, temporary access and spur roads, cut and fill slopes, and locations of existing towers that are removed during construc-tion of the project. For temporary disturbances in agriculture, developed/disturbed, ~~and~~ most grassland/forbland (excluding ~~suitable~~ occupied Stephens' kangaroo rat habitat and any areas with 10 percent or greater relative cover of native perennial grass species), and for temporary disturbance areas that are stabilized because they cannot be effectively revegetated, the overall goals of the HRRP will be to minimize weed invasion, dust generation, and soil erosion. The goals for sensitive vegetation and special-status species habitat are described in Part B of this Mit-igation Measure. The Draft HRRP shall be submitted to CPUC and BLM review and approval prior to the beginning of ground-disturbing activities. SCE shall incorporate all requested revisions in coordination with the CPUC and BLM and finalize the HRRP within 12 months from the start of construction. For all temporary disturbance areas, the HRRP shall include the following elements: □□A statement of revegetation goals and objectives for each portion of the project area, based on vegetation type and jurisdictional status of each site. □□Quantitative success criteria for each revegetation or restoration site or category. □□Implementation details, including but not limited to topsoil stockpiling and handling; post-construction site preparation; soil decompaction and recontouring; planting and seeding palettes to include only native, locally sourced materials with confirmed availability from suppliers; fall-season planting or seeding dates. □□Maintenance, including but not limited to irrigation or hand-watering schedule and equip-ment, erosion control, and weed control. □□Monitoring and Reporting, specifying monitoring schedule and data collection methods throughout establishment of vegetation with key indicators of successful or unsuccessful progress, and quantitative values to objectively determine success or failure at the conclusion of the monitoring period. □□Contingency measures such as re-planting, drainage repairs, adjustments to irrigation or weeding schedule, and extension of maintenance beyond the original schedule, to repair or remediate sites not on track to meet success criteria, or not meeting the criteria at the close of the originally scheduled monitoring period. The Integrated Weed Management Plan (Mitigation Measure VEG-2a) will be implemented throughout implementation of the HRRP. For all revegetation or restoration areas, only seed or potted nursery stock of locally occurring native species from a local source will be used for revegetation. Seeding and planting will be conducted as described in Chapter 5 of *Rehabilitation of Disturbed Lands in California* (Newton and Claassen, 2003). The list of plants observed during botanical surveys of the project area will be used as a guide to site-specific plant selection. For all revegetation or restoration areas, the HRRP will include objective, quantifiable success criteria, commensurate with the goals for each site. Monitoring of the reclamation, revegetation, or restoration sites will continue annually for ~~no fewer than~~ five (5) years or until the defined success criteria are achieved~~, whichever is later~~. SCE will be responsible for implementing

remediation measures as needed. ~~Following remediation work, each site will be subject to the success criteria and monitoring period as required for the initial reclama-tion, revegetation, or restoration.~~

Part B: Additional habitat restoration and revegetation requirements for sensitive vegetation and special-status species habitat.
For temporary disturbances in grassland/forbland that is either ~~suitable~~ occupied Stephens' kangaroo rat habitat, or has 10 percent or greater relative cover of native perennial grass species (see VEG-1c), and in all other sensitive vegetation types (alluvial scrub, coast live oak woodland, coastal sage scrub, ~~chaparral, desert scrub,~~ and riparian woodland, ~~and aeolian sand~~), the Habitat Restoration and Revegetation Plan will be designed to replace the habitat values that were present prior to disturbance (i.e., native plant species cover, habitat structure, and soil or substrate conditions). The following performance standards must be met by the end of the monitoring period:

□□Performance standards for absolute (total) cover by all vegetation types and for relative cover by native species will be established by the HRRP and will depend on pre-construction conditions (i.e., total coverage and relative native cover) in the specific communities being replaced in each area or based on the absolute and relative native coverage values identified within adjacent communities that contain the same vegetation type and on similar slope aspect of the vegetation being re-established.
~~□□At least 80 percent of the vegetation cover within the restoration area shall be native species that naturally occur in local native habitats;~~
□□Absolute cover ~~and density~~ of ~~native~~ all plant species within the restoration areas shall equal at least ~~60~~ 80 percent of the total cover by vegetation within pre-disturbance or reference vegetation ~~cover~~; and
□□Native plant species in the restoration areas shall contribute at least 70 percent of the relative cover contributed by native species within pre-disturbance or reference vegetation; and
□□The site shall have persisted successfully without irrigation or remedial planting for a minimum of ~~three~~ two years prior to completion of monitoring.

For revegetation or restoration in these habitats, the HRRP will include (in addition to the components listed in Part A):

□□A map depicting the locations of all temporary disturbance areas in these habitats, includ-ing a quantitative evaluation of native grass cover and occupied Stephens' kangaroo rat habitat ~~suitability~~ in all mapped grassland/forbland areas, subject to requirements of Part B;

□□An inventory of any temporary disturbance areas occupied by special-status species that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe (these will be cate-gorized as "long-term disturbance areas," to be addressed under habitat compensation, Mitigation Measure VEG-1e).

Reporting (for Part A and Part B). For all revegetation or restoration areas, SCE will provide annual reports to the CPUC and BLM verifying the total vegetation acreage subject to tem-porary and permanent disturbance, identifying which items of the HRRP have been com-pleted, and which items are still outstanding. The annual reports will also include a summary of the reclamation, revegetation, or restoration activities for the year, a discussion of whether performance standards for the year were met, any remedial actions conducted and recommendations for remedial action, if warranted, that are planned for the upcoming year. Each annual report will be submitted within 90 days after completion of each year of revegetation and restoration work.

Implementation locations: Parts A and B of this ~~mitigation measure shall apply as follows: San Bernardino County (all); WR-MSHCP (within the WR-MSHCP regardless of SCE's PSE status); CV-MSHCP (within the CV-MSHCP regardless of SCE's PSE status); BLM (all); reserva-tion (recommended for all Morongo Tribal Lands).~~ mitigation measure applies to all

		locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's temporary habitat impacts will be restored, revegetated or stabilized according to the requirements of the MSHCP, and this mitigation measure will not apply within the applicable MSHCP area.
D.4-39 through 43	**VEG-1e Compensate for permanent habitat loss.** SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management. This compensation may be accomplished through participation in the WR-MSHCP, CV-MSHCP (within the respective MSHCP areas) if SCE obtains PSE status. This mitigation measure will be applicable to all per-manent project disturbance areas and to areas designated as temporary disturbance, but that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe. Habitat compensation for all permanent or long-term habitat loss that is not compensated through participation in the WR-MSHCP or CV-MSHCP will be accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions. SCE will prepare a Habitat Compensation Plan to be reviewed and approved by the CPUC, BLM, in consultation with the USFWS and CDFW. SCE will acquire and protect, in perpetuity, compensation habitat to mitigate impacts to bio-logical resources as detailed below. SCE shall be responsible for the acquisition, initial pro-tection and habitat improvement, and long-term maintenance and management of compen-sation lands. The compensation lands will be placed under conservation management to be funded through the terms described herein. The acreages of compensation land will be based upon final engineering calculation of impacted acreage for each resource and on ratios set forth in this measure, or in the USFWS Biological Opinion, the CDFW Streambed Alteration Agreement, the CDFW Incidental Take Permit, or the Consistency Determination, whichever presents a higher ratio. Acreages will be adjusted as appropriate for other alternatives or future modifications during implementation. Compensation will be provided for impacts to the following resources, at the ratios specified below (acres acquired and preserved to acres impacted). These ratios reflect multiple bio-logical resource values, including habitat suitability for special-status species and wildlife movement or biological connectivity. □□Previously disturbed lands (agriculture, developed/disturbed) and open water: n/a (no habitat compensation required) □□Chaparral, desert scrub, and grassland/forbland: 1:1 □□Alluvial scrub, coast live oak woodland, coastal sage scrub, riparian woodland, and aeolian sand: 3:1 The Habitat Compensation Plan will specify compensation acreage for each habitat type, based on final engineering and on MSHCP coverage as applicable. Final compensation requirements may be	Edits to VEG-1e are proposed for the following reasons: **Paragraph 1:** Inserted "approved in-lieu-fee compensatory mitigation bank" to clarify the option to use mitigation banks. **Paragraph 4:** The resource agencies are responsible for oversight on compensatory mitigation to special-status species. As such, special-status species habitat specific mitigation ratios as specified in the permit conditions, should supersede the ratios in VEG-1e. Ratios applied may vary based on the functions and values of disturbed habitat vs. the functions and values of the replacement habitat which should be taken into consideration and the ratios specified in VEG-1e should not be absolute. **Paragraph 5, Compensation Ratios:** Aeolian sand is not designated as a state sensitive natural community and is recommended to be deleted, as with chaparral, desert scrub and grassland/forbland, which are common communities along the project route and are not considered to be of special concern (ranked S-1 to S-3) by the. If the intent is to compensate for special-status species habitat, only habitat known to support them should require compensation, which would be required in the applicable resource agency permit condition. As stated in *Impact WIL-4: Project activities and facilities could cause adverse effects to habitat linkages or wildlife movement corridors, "…the Proposed Project would not cause increased barriers or hindrances to wildlife movement, no mitigation is recom-mended."* As such, compensation ratios should not be based on wildlife movement or biological connectivity, because the transmission line does not block wildlife movement. In addition, coastal sage scrub habitat along the project is generally patchy and its function and value as California gnatcatcher habitat is reduced, as evidenced by the negative survey results in 2012, 2013, and most recently in 2015. A 1:1 ratio is suggested for Coastal sage scrub, subject to revision based on subsequent permit conditions. **Paragraphs 10-32:** The information described in these paragraphs are typical requirements of compensatory mitigation included in resource agency permit conditions. The level of detail included this mitigation measure may lead to inconsistencies in requirements. It is recommended that this level of detail be removed from this mitigation measure to prevent future conflicts with subsequent permit conditions. A Habitat Compensation Plan will be prepared to comply with permit conditions which will include the details similar to the list below. **Suggested Revisions:** **VEG-1e Compensate for permanent habitat loss.** SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management, or through participation in an approved in-lieu-fee compensatory mitigation bank. This compensation may be accomplished through participation in the WR-MSHCP, CV-MSHCP (within the respective MSHCP areas) if SCE obtains PSE status. This mitigation measure will be applicable to all per-manent project disturbance

	adjusted to account for any deviations in project disturbance, accord-ing to the as-built shapefiles ortho-rectified aerial imagery (Mitigation Measure VEG-1c). **Compensation Land Selection Criteria.** Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands for impacts to biological resources will include all of the following: □□Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the project, taking into consideration soils, vege-tation, topography, human-related disturbance, wildlife movement opportunity, proxi-mity to other protected lands, management feasibility, and other habitat values, subject to review and approval by CPUC and BLM; □□To the extent that proposed compensation habitat may have been degraded by previous uses or activities, the site quality and nature of degradation must support the expectation that it will regenerate naturally when disturbances are removed; □□Be near larger blocks of lands that are either already protected or planned for protection, or which could feasibly be protected long-term by a public resource agency or a non-governmental organization dedicated to habitat preservation; □□Not have a history of intensive recreational use or other disturbance that might cause future erosion or other habitat damage, and make habitat recovery and restoration infeasible; □□Not be characterized by high densities of invasive species, either on or immediately adja-cent to the parcels under consideration, that might jeopardize habitat recovery and restoration; □□Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat; □□Must provide wildlife movement value equal to that on the project site, based on topog-raphy, presence and nature of movement barriers or crossing points, location in relation-ship to other habitat areas, management feasibility, and other habitat values; and □□Have water and mineral rights included as part of the acquisition, unless the CPUC and BLM, in consultation with CDFW and USFWS, agree in writing to the acceptability of land without these rights. **Review and Approval of Compensation Lands Prior to Acquisition.** SCE shall submit a Draft Habitat Compensation Plan for review and approval by the CPUC and BLM describing the parcel(s) intended for protection. This Plan will discuss the suitability of the proposed parcel(s) as compensation lands in relation to the selection criteria listed above. **Management Plan.** SCE or approved third party will prepare a management plan for the compensation lands in consultation with the entity that will be managing the lands. The goal of the management plan will be to support and enhance the long-term viability of the bio-logical resources. The Management Plan will be submitted for review and approval to the CPUC and BLM, in consultation with CDFW and USFWS.	areas and to areas designated as temporary disturbance, but that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe. Habitat compensation for all permanent or long-term habitat loss that is not compensated through participation in the WR-MSHCP or CV-MSHCP will be accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions. SCE will prepare a Habitat Compensation Plan to be reviewed and approved by the CPUC, BLM, in consultation with the USFWS and CDFW. SCE will acquire and protect, in perpetuity, compensation habitat to mitigate impacts to sensitive bio-logical resources as detailed below. SCE shall be responsible for the acquisition, initial pro-tection and habitat improvement, and long-term maintenance and management of compen-sation lands. The compensation lands will be placed under conservation management to be funded through the terms described herein. The acreages of compensation land will be based upon final engineering calculation of impacted acreage for each resource and on ratios set forth in this measure, or will be superseded with the ratios in the USFWS Biological Opinion, the CDFW Streambed Alteration Agreement, the CDFW Incidental Take Permit, or the Consistency Determination~~., whichever presents a higher ratio.~~ Acreages will be adjusted as appropriate for other alternatives or future modifications during implementation. Compensation will be provided for impacts to the following resources, at the ratios specified below (acres acquired and preserved to acres impacted). These ratios reflect multiple bio-logical resource values, including habitat suitability for special-status species. ~~and wildlife movement or biological connectivity~~. □□Previously disturbed lands (agriculture, developed/disturbed) and open water: n/a (no habitat compensation required) □□~~Chaparral, desert scrub, and grassland/forbland~~ Coastal sage scrub: 1:1 □□Alluvial scrub, coast live oak woodland, ~~coastal sage scrub~~, and riparian woodland~~, and acolian sand~~: 3:1 The Habitat Compensation Plan will specify compensation acreage for each habitat type, based on final engineering, resource agency permit conditions and on MSHCP coverage, as applicable. Final compensation requirements may be adjusted to account for any deviations in project disturbance, accord-ing to the as-built shapefiles ortho-rectified aerial imagery (Mitigation Measure VEG-1c). ~~**Compensation Land Selection Criteria.** Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands for impacts to biological resources will include all of the following:~~ ~~□□Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the project, taking into consideration soils, vege-tation, topography, human-related disturbance, wildlife movement opportunity, proxi-mity to other protected lands, management feasibility, and other habitat values, subject to review and approval by CPUC and BLM;~~ ~~□□To the extent that proposed compensation habitat may have been degraded by previous uses or activities, the site quality and nature of degradation must support the expectation that it will regenerate naturally when disturbances are removed;~~ ~~□□Be near larger blocks of lands that are either already protected or planned for protection, or which could feasibly be protected long-term by a public resource agency or a non-governmental organization dedicated to habitat preservation;~~

	Compensation Lands Acquisition Requirements. SCE will comply with the following require-ments relating to acquisition of the compensation lands after the CPUC and BLM have approved the proposed compensation lands: □□**Preliminary Report.** SCE or an approved third party will provide a recent preliminary title report, initial hazardous materials survey report, biological resources analysis, and other necessary or requested documents for the proposed compensation land to the CPUC and BLM. All documents conveying or conserving compensation lands and all conditions of title are subject to review and approval by the CPUC in consultation with CDFW and USFWS. For conveyances to the State, approval may also be required from the California Department of General Services, the Fish and Game Commission, and the Wildlife Conser-vation Board. □□**Title/Conveyance.** SCE will acquire and transfer fee title to the compensation lands, a conservation easement over the lands, or both fee title and conservation easement, as required by the CPUC and BLM, in consultation with USFWS and CDFW. Any transfer of a conservation easement or fee title must be to CDFW, to a non-profit organization quali-fied to hold title to and manage compensation lands (pursuant to California Government Code section 65965), or to BLM or other public agency approved by the CPUC and BLM. If an approved non-profit organization holds fee title to the compensation lands, a conser-vation easement will be recorded in favor of CDFW or another entity approved by the CPUC and BLM. If an entity other than CDFW holds a conservation easement over the compensation lands, the CPUC and BLM may require that CDFW or another entity approved by the CPUC and BLM, in consultation with CDFW and USFWS, be named a third party beneficiary of the conservation easement. SCE will obtain approval of the CPUC and BLM of the terms of any transfer of fee title or conservation easement to the compensation lands. □□**Initial Protection and Habitat Improvement.** SCE will fund activities that the CPUC and BLM may require for the initial protection and habitat improvement of the compensation lands. These activities will vary depending on the condition and location of the land acquired, but may include trash removal, construction and repair of fences, invasive plant removal, and similar measures to protect habitat and improve habitat quality on the compensation lands. A non-profit organization, CDFW, or another public agency may hold and expend the habitat improvement funds if it is qualified to manage the compensation lands (pursuant to California Government Code section 65965), if it meets the approval of the CPUC and BLM, in consultation with USFWS and CDFW, and if it is authorized to participate in implementing the required activities on the compensation lands. If CDFW takes fee title to the compensation lands, the habitat improvement fund must be paid to CDFW or its designee. □□**Property Analysis Record.** Upon identification of the compensation lands, SCE will con-duct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate amount of the long-term maintenance and management fund to pay the in-perpetuity management of the compensation lands. The PAR or PAR-like analysis must be approved by the CPUC and BLM, in consultation with USFWS and CDFW, before it can be used to establish funding levels or management activities for the compensation lands.	~~□□Not have a history of intensive recreational use or other disturbance that might cause future erosion or other habitat damage, and make habitat recovery and restoration infeasible;~~ ~~□□Not be characterized by high densities of invasive species, either on or immediately adja-cent to the parcels under consideration, that might jeopardize habitat recovery and restoration;~~ ~~□□Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat;~~ ~~□□Must provide wildlife movement value equal to that on the project site, based on topog-raphy, presence and nature of movement barriers or crossing points, location in relation-ship to other habitat areas, management feasibility, and other habitat values; and~~ ~~□□Have water and mineral rights included as part of the acquisition, unless the CPUC and BLM, in consultation with CDFW and USFWS, agree in writing to the acceptability of land without these rights.~~ ~~**Review and Approval of Compensation Lands Prior to Acquisition.** SCE shall submit a Draft Habitat Compensation Plan for review and approval by the CPUC and BLM describing the parcel(s) intended for protection. This Plan will discuss the suitability of the proposed parcel(s) as compensation lands in relation to the selection criteria listed above.~~ ~~**Management Plan.** SCE or approved third party will prepare a management plan for the compensation lands in consultation with the entity that will be managing the lands. The goal of the management plan will be to support and enhance the long-term viability of the bio-logical resources. The Management Plan will be submitted for review and approval to the CPUC and BLM, in consultation with CDFW and USFWS.~~ ~~**Compensation Lands Acquisition Requirements.** SCE will comply with the following require-ments relating to acquisition of the compensation lands after the CPUC and BLM have approved the proposed compensation lands:~~ ~~□□**Preliminary Report.** SCE or an approved third party will provide a recent preliminary title report, initial hazardous materials survey report, biological resources analysis, and other necessary or requested documents for the proposed compensation land to the CPUC and BLM. All documents conveying or conserving compensation lands and all conditions of title are subject to review and approval by the CPUC in consultation with CDFW and USFWS. For conveyances to the State, approval may also be required from the California Department of General Services, the Fish and Game Commission, and the Wildlife Conser-vation Board.~~ ~~□□**Title/Conveyance.** SCE will acquire and transfer fee title to the compensation lands, a conservation easement over the lands, or both fee title and conservation easement, as required by the CPUC and BLM, in consultation with USFWS and CDFW. Any transfer of a conservation easement or fee title must be to CDFW, to a non-profit organization quali-fied to hold title to and manage compensation lands (pursuant to California Government Code section 65965), or to BLM or other public agency approved by the CPUC and BLM. If an approved non-profit organization holds fee title to the compensation lands, a conser-vation easement will be recorded in favor of CDFW or another entity approved by the CPUC and BLM. If an entity other than CDFW holds a conservation easement over the compensation lands, the CPUC and BLM may require that CDFW or another entity approved by the CPUC and BLM, in consultation with CDFW and USFWS, be named a third party beneficiary of the conservation easement. SCE will obtain approval of the CPUC and BLM of the terms of any transfer of fee title or conservation easement to the compensation lands.~~ ~~□□**Initial Protection and Habitat Improvement.** SCE will fund activities that the CPUC and BLM may require for the initial protection and habitat improvement of the compensation lands. These activities will vary depending on the condition~~

	Long-term Maintenance and Management Funding. SCE will provide funding to establish an account with non-wasting capital that will be used to fund the long-term maintenance and management of the compensation lands. The amount of money will be determined through an approved PAR or PAR-like analysis conducted for the compensation lands. SCE must obtain the BLM and Riverside County's approval of the entity that will receive and hold the long-term maintenance and management fund for the compensation lands. The CPUC and BLM will consult with USFWS and CDFW before deciding whether to approve an entity to hold the project's long-term maintenance and management funds. SCE will ensure that an agreement is in place with the long-term maintenance and man-agement fund holder/manager to ensure the following requirements are met: **– Interest.** Interest generated from the initial capital long-term maintenance and man-agement fund will be available for reinvestment into the principal and for the long-term operation, management, and protection of the approved compensation lands, includ-ing reasonable administrative overhead, biological monitoring, habitat improvements, patrol and law enforcement activities, and any other action that is approved by the CPUC and BLM and is designed to protect or improve the habitat values of the compen-sation lands. **– Withdrawal of Principal.** The long-term maintenance and management fund principal will not be drawn upon unless such withdrawal is deemed necessary by the CPUC and BLM, or by the approved third-party long-term maintenance and management fund manager, to ensure the continued viability of the species on the compensation lands. **– Pooling Long-Term Maintenance and Management Funds.** An entity approved to hold long-term maintenance and management funds for the project may pool those funds with similar non-wasting funds that it holds from other projects for long-term mainte-nance and management of compensation lands. However, for reporting purposes, the long-term maintenance and management funds for this project must be tracked and reported individually to the CPUC and BLM. **Other Expenses.** In addition to the costs listed above, SCE will be responsible for all other costs related to acquisition of compensation lands and conservation easements, including but not limited to the title and document review costs incurred from other state agency reviews, overhead related to providing compensation lands to CDFW or an approved third party, escrow fees or costs, environmental contaminants clearance, and other site cleanup measures. **Delegation.** The responsibility for acquisition of compensation lands may be delegated to a third party, by written agreement of the CPUC and BLM, in consultation with CDFW, prior to land acquisition, enhancement or management activities. **Implementation Locations:** This mitigation measure applies to all locations within San Ber-nardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's permanent habitat impacts will be compensated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.	~~and location of the land acquired, but may include trash removal, construction and repair of fences, invasive plant removal, and similar measures to protect habitat and improve habitat quality on the compensation lands. A non-profit organization, CDFW, or another public agency may hold and expend the habitat improvement funds if it is qualified to manage the compensation lands (pursuant to California Government Code section 65965), if it meets the approval of the CPUC and BLM, in consultation with USFWS and CDFW, and if it is authorized to participate in implementing the required activities on the compensation lands. If CDFW takes fee title to the compensation lands, the habitat improvement fund must be paid to CDFW or its designee.~~ ~~**Property Analysis Record.** Upon identification of the compensation lands, SCE will con-duct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate amount of the long-term maintenance and management fund to pay the in-perpetuity management of the compensation lands. The PAR or PAR-like analysis must be approved by the CPUC and BLM, in consultation with USFWS and CDFW, before it can be used to establish funding levels or management activities for the compensation lands.~~ ~~**Long-term Maintenance and Management Funding.** SCE will provide funding to establish an account with non-wasting capital that will be used to fund the long-term maintenance and management of the compensation lands. The amount of money will be determined through an approved PAR or PAR-like analysis conducted for the compensation lands. SCE must obtain the BLM and Riverside County's approval of the entity that will receive and hold the long-term maintenance and management fund for the compensation lands. The CPUC and BLM will consult with USFWS and CDFW before deciding whether to approve an entity to hold the project's long-term maintenance and management funds.~~ ~~SCE will ensure that an agreement is in place with the long-term maintenance and man-agement fund holder/manager to ensure the following requirements are met:~~ ~~**– Interest.** Interest generated from the initial capital long-term maintenance and man-agement fund will be available for reinvestment into the principal and for the long-term operation, management, and protection of the approved compensation lands, includ-ing reasonable administrative overhead, biological monitoring, habitat improvements, patrol and law enforcement activities, and any other action that is approved by the CPUC and BLM and is designed to protect or improve the habitat values of the compen-sation lands.~~ ~~**– Withdrawal of Principal.** The long-term maintenance and management fund principal will not be drawn upon unless such withdrawal is deemed necessary by the CPUC and BLM, or by the approved third-party long-term maintenance and management fund manager, to ensure the continued viability of the species on the compensation lands.~~ ~~**– Pooling Long-Term Maintenance and Management Funds.** An entity approved to hold long-term maintenance and management funds for the project may pool those funds with similar non-wasting funds that it holds from other projects for long-term mainte-nance and management of compensation lands. However, for reporting purposes, the long-term maintenance and management funds for this project must be tracked and reported individually to the CPUC and BLM.~~ ~~**Other Expenses.** In addition to the costs listed above, SCE will be responsible for all other costs related to acquisition of compensation lands and conservation easements, including but not limited to the title and document review costs incurred from other state agency reviews, overhead related to providing compensation lands to CDFW or an approved third party, escrow fees or costs, environmental contaminants clearance, and other site cleanup measures.~~ ~~**Delegation.** The responsibility for acquisition of compensation lands may be delegated to a third party, by written agreement of the CPUC and BLM, in consultation with CDFW, prior to land acquisition, enhancement or management activities.~~

		Implementation Locations: This mitigation measure applies to all locations within San Ber-nardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's permanent habitat impacts will be compensated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.
D.4-45	**Surface water flow.** Project activities could interrupt localized surface hydrology. For example, berms or channel crossings could impound stormwater runoff and sediment on the upstream sides. This impoundment could affect native vegetation and habitat by inundating, burying, or covering it in sediment. In addition, interruption, impoundment, or redirection of natural flows (including infrequent storm flows) could cause substantial erosion to downstream soils where flow is redirected, and prevent water and sediment from reaching downstream vegetation and habitat. This effect could reduce vegetation productivity and related wildlife habitat values (food, shade, and shelter) and reduce availability of silt and sand as habitat substrate for plants and wildlife downstream. Upstream inundation and downstream erosion also could eliminate vegetation and habitat for wildlife, including special-status species, by killing or uprooting plants and eroding or burying burrows. These effects may be limited to the Proposed Project's construction and or restoration phases, if surface contours and soil stability are returned to pre-disturbance conditions during restoration. Alternately, these effects could persist throughout the O&M phase if they are caused by permanent structures (such as impoundments at road crossings). SCE would implement APM HYDRO-1 through APM HYDRO-3 (see Table B-18) to minimize alteration of surface flows. Under these APMs, drainage improvements (e.g., channel crossings and downslope road drainageways) would be designed to maintain existing flow patterns; soil disturbance would be mini-mized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures; and erosion control plans would be incorporated into the construction bidding specifications to ensure compliance by SCE's contractor. APMs HYDRO-2 and HYDRO-3 are superseded by Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compli-ance with water quality permits). Mitigation Measure WR-2a would minimize or mitigate the effects of surface hydrology alterations. These measures include mulching, physical stabilization, dust suppression, berms, ditches, and sediment barriers, and ensure proper compliance with Storm Water Pollution Pre-vention Plan (SWPPP) requirements and Best Management Practices (BMPs).	Please make the following revision: **Surface water flow.** Project activities could interrupt localized surface hydrology. For example, berms or channel crossings could impound stormwater runoff and sediment on the upstream sides. This impoundment could affect native vegetation and habitat by inundating, burying, or covering it in sediment. In addi-tion, interruption, impoundment, or redirection of natural flows (including infrequent storm flows) could cause substantial erosion to downstream soils where flow is redirected, and prevent water and sedi-ment from reaching downstream vegetation and habitat. This effect could reduce vegetation pro-ductivity and related wildlife habitat values (food, shade, and shelter) and reduce availability of silt and sand as habitat substrate for plants and wildlife downstream. Upstream inundation and downstream erosion also could eliminate vegetation and habitat for wildlife, including special-status species, by killing or uprooting plants and eroding or burying burrows. These effects may be limited to the Proposed Project's construction and or restoration phases, if surface contours and soil stability are returned to pre-disturbance conditions during restoration. ~~Alternately, these~~ These effects could persist throughout the O&M phase if they are caused by permanent structures (such as impoundments at road crossings); however, the increased effects would be similar to the existing baseline conditions caused by existing O&M on the existing WOD ROW. SCE would implement APM HYDRO-1 through APM HYDRO-3 (see Table B-18) to minimize alteration of surface flows. Under these APMs, drainage improvements (e.g., channel crossings and downslope road drainageways) would be designed to maintain existing flow patterns; soil disturbance would be mini-mized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures; and erosion control plans would be incorporated into the construction bidding specifications to ensure compliance by SCE's contractor. APMs HYDRO-2 and HYDRO-3 are superseded by Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compli-ance with water quality permits). Mitigation Measure WR-2a would minimize or mitigate the effects of surface hydrology alterations. These measures include mulching, physical stabilization, dust suppression, berms, ditches, and sediment barriers, and ensure proper compliance with Storm Water Pollution Pre-vention Plan (SWPPP) requirements and Best Management Practices (BMPs).
D.4-45	**VEG-2a Prepare and implement an Integrated Weed Management Plan.** SCE shall prepare and imple-ment an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved. For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project	As acknowledged in this impact assessment, the project ROW is already heavily infested with weeds. After the IWMP has been fully implemented (and the post-construction restoration period is complete), SCE should not be obligated to monitor and survey during the O&M of the line. Please make the following revisions: **VEG-2a Prepare and implement an Integrated Weed Management Plan.** SCE shall prepare and imple-ment an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved.

	construction, restoration, and O&M. The IWMP will include the information defined in the following paragraphs.	For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction~~,~~ and restoration~~, and O&M~~. The IWMP will include the information defined in the following paragraphs.
D.4-45	**Monitoring.** The IWMP shall specify methods to survey for weeds during construction, res-toration, and O&M; and shall specify qualifications of botanists responsible for weed moni-toring and identification. It must include a monitoring schedule to ensure timely detection and immediate control of weed infestations to prevent further spread. Surveying and moni-toring for weed infestations shall occur at least two times per year, to coincide with the early detection period for early season and late season weeds (i.e., species germinating in winter and flowering in late winter or spring, and species germinating later in the season and flowering in summer or fall). It also must include methods for marking invasive weeds on the ROW, and recording and communicating these locations to weed control staff. The map of weed locations (discussed above) shall be updated at least once a year. The monitor-ing section shall also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.	After the IWMP has been fully implemented (and the post-construction restoration period is complete), SCE should not be obligated to monitor and survey during the O&M of the line. Please make the following revisions: **Monitoring.** The IWMP shall specify methods to survey for weeds during construction and restoration; ~~res-toration, and O&~~M; and shall specify qualifications of botanists responsible for weed moni-toring and identification. It must include a monitoring schedule to ensure timely detection and immediate control of weed infestations to prevent further spread. Surveying and moni-toring for weed infestations shall occur at least two times per year, to coincide with the early detection period for early season and late season weeds (i.e., species germinating in winter and flowering in late winter or spring, and species germinating later in the season and flowering in summer or fall). It also must include methods for marking invasive weeds on the ROW, and recording and communicating these locations to weed control staff. The map of weed locations (discussed above) shall be updated at least once a year. The monitor-ing section shall also describe methods for post-eradication monitoring to evaluate success of control efforts and any need for follow-up control.
D.4-46	**VEG-2a Prepare and implement an Integrated Weed Management Plan.** SCE shall prepare and imple-ment an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved. For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, restoration, and O&M. The IWMP will include the information defined in the following paragraphs. **Background.** An assessment of the Proposed Project's potential to cause spread of invasive non-native weeds into new areas, or to introduce new non-native invasive weeds into the ROW. This section must list known and potential non-native and invasive weeds occurring on the ROW and in the project region, and identify threat rankings and potential conse-quences of project-related occurrence or spread for each species. This assessment will include, but is not limited to, weeds that (1) are rated high or moderate for negative ecolog-ical impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006), and (2) aid and promote the spread of wildfires (such as cheatgrass, Saharan mustard, and medusa head). This section will identify control goals for each species (e.g., eradication, suppression, or containment) likely to be found within the Proposed Project area. **Pre-construction weed inventory.** SCE shall inventory the entire ROW, including all areas subject to ground-disturbing activity, including, but not limited to, tower pad preparation and construction areas,	Requiring an inventory of weeds over the entire ROW should not be necessary because substantial areas within the ROW will not be affected. Conversely, there are many areas outside the ROW that will be affected and should be included in the weed inventory effort. It should be sufficient to repeatedly survey the areas in and immediately adjacent to project areas subject to ground disturbing activities. Suggested Revision: **VEG-2a Prepare and implement an Integrated Weed Management Plan.** SCE shall prepare and imple-ment an Integrated Weed Management Plan (IWMP) describing the proposed methods of preventing or controlling project-related spread of weeds or new weed infestations. The IWMP also must meet BLM's requirements for NEPA disclosure and analysis if herbicide use is proposed for the project. A Draft IWMP shall be submitted to the CPUC and BLM for review and approval at least 60 days prior to SCE's application for Notice to Proceed, and no pre-construction activities (e.g., for geotechnical borings, hazardous waste evaluations, etc.), construction, equipment or crew mobilization, or project-related ground-disturbing activity shall proceed until the IWMP is approved. For the purpose of the IWMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture, the California Invasive Plant Council, or identified by BLM as special concern. The IWMP will include the contents listed below. The IWMP will be implemented throughout project construction, and restoration~~, and O&M~~. The IWMP will include the information defined in the following paragraphs. **Background.** An assessment of the Proposed Project's potential to cause spread of invasive non-native weeds into new areas, or to introduce new non-native invasive weeds into the ROW. This section must list known and potential non-native and invasive weeds occurring on the ROW and in the project region, and identify threat rankings and potential conse-quences of project-related occurrence or spread for each species. This assessment will include, but is not limited to, weeds that (1) are rated high or moderate for negative ecolog-ical impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006),

	tower removal sites, pulling and tensioning sites, assembly yards, and any potential new or improved access and spur roads. Weed occurrences shall be mapped and described according to density and area covered. The map will be updated at least once a year.	and (2) aid and promote the spread of wildfires (such as cheatgrass, Saharan mustard, and medusa head). This section will identify control goals for each species (e.g., eradication, suppression, or containment) likely to be found within the Proposed Project area. **Pre-construction weed inventory.** SCE shall inventory ~~the entire ROW, including~~ all areas subject to ground-disturbing activity, including, but not limited to, tower pad preparation and construction areas, tower removal sites, pulling and tensioning sites, assembly yards, and any potential new or improved access and spur roads. Weed occurrences shall be mapped and described according to density and area covered. The map will be updated at least once a year.
D.4-46 through 47	**Prevention.** The IWMP will specify methods to minimize potential transport of weed seeds onto the ROW, or from one section of the ROW to another. The ROW may be divided into "weed zones," based on known or likely invasive weeds in any portion of the ROW. The IWMP will specify inspection procedures for construction materials and equipment entering the Proposed Project area. Vehicles and equipment may be inspected and cleaned at entry points to specified portions of the ROW, and before leaving work sites where weed occurrences must be contained locally. Construction equipment shall be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Equipment shall be inspected to ensure it is free of any dirt or mud that could contain weed seeds, and the tracks, outriggers, tires, and undercarriage will be carefully washed, with special attention being paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g., pick-up trucks) that will be frequently entering and exiting the site will be inspected and washed on an as-needed basis. Tools such as chainsaws, hand clippers, pruners, etc., shall be cleaned of dirt and mud before entering project work areas. All vehicles will be washed off-site when possible. If off-site washing is infeasible, on-site cleaning stations will be set up at specified locations to clean equipment before it enters the work area. Wash stations will be located away from native habitat or special-status species occurrences. Wastewater from cleaning stations will not be allowed to run off the cleaning station site. When vehicles and equipment are washed, a daily log must be kept stating the location, date and time, types of equipment, methods used, and personnel present. The log shall contain the signature of the responsible crewmember. Written or electronic logs shall be available to BLM and CPUC monitors on request.	The requirements stipulating that vehicles and equipment "may" be inspected or "shall" be cleaned of dirt and mud that could contain weed seeds will be cumbersome to implement and may be ineffective. Requirements involving setting up "on-site cleaning stations" will be difficult or highly impractical to implement and requiring inspections and logs to be kept that all vehicles are checked will be very cumbersome and involve substantial cost to maintain inspectors at numerous entry points. In recognition of the facts that 1) the entire project area is heavily infested with many weed species, some of which all parties recognize it is beyond the scope of the project to manage, and 2) SCE will implement a program to control weeds whenever they appear in areas where they have not previously occurred, it would be highly preferable not to try to put wash stations at multiple locations or try to inspect vehicles at numerous entry points but rather to require the following standard protocol to be adhered to: Vehicles and equipment traveling between weed zones will require washing at commercial car washes. The following revisions are suggested: **Prevention.** The IWMP will specify ~~methods~~ <u>that vehicles and equipment traveling between weed zones will require washing at commercial car washes</u> to minimize potential transport of weed seeds onto the ROW, or from one section of the ROW to another. The ROW may be divided into "weed zones," based on known or likely invasive weeds in any portion of the ROW. The IWMP will specify inspection procedures for construction materials and equipment entering the Proposed Project area. ~~Vehicles and equipment may be inspected and cleaned at entry points to specified portions of the ROW, and before leaving work sites where weed occurrences must be contained locally. Construction equipment shall be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Equipment shall be inspected to ensure it is free of any dirt or mud that could contain weed seeds, and the tracks, outriggers, tires, and undercarriage will be carefully washed, with special attention being paid to axles, frame, cross members, motor mounts, underneath steps, running boards, and front bumper/brush guard assemblies. Other construction vehicles (e.g., pick-up trucks) that will be frequently entering and exiting the site will be inspected and washed on an as-needed basis.~~ Tools such as chainsaws, hand clippers, pruners, etc., shall be cleaned of dirt and mud before entering project work areas. ~~All vehicles will be washed off-site, when possible. If off-site washing is infeasible, on-site cleaning stations will be set up at specified locations to clean equipment before it enters the work area. Wash stations will be located away from native habitat or special-status species occurrences. Wastewater from cleaning stations will not be allowed to run off the cleaning station site. When vehicles and equipment are washed, a daily log must be kept stating the location, date and time, types of equipment, methods used, and personnel present. The log shall contain the signature of the responsible crewmember. Written or electronic logs shall be available to BLM and CPUC monitors on request.~~
D.4-48	Weed infestations will be treated at a minimum of once annually until eradication, suppression, or containment goals are met. For eradication, when no new seedlings or resprouts are observed for three	Because the entire project area is heavily infested with many weed species (some of which are unmanageable), SCE will implement a program to control weeds whenever they appear in areas where they have not previously occurred, and the project area is experiencing a long period of drought, SCE recommends the following revisions:

	consecutive, normal rainfall years, the weed occurrence can be considered eradicated and weed control efforts may cease for the site.	Weed infestations will be treated at a minimum of once annually until eradication, suppression, or containment goals are met per the IWMP. ~~For eradication, when no new seedlings or resprouts are observed, for three consecutive normal rainfall years, the weed occurrence can be considered eradicated and weed control efforts may cease for the site.~~
D.4-49	Potential impacts to jurisdictional drainages would be reduced through implementation of a Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) as described in Section 4.9 of the PEA (see page 4.9-21), and compliance with the conditions set forth in State and fede-ral permits or authorizations (California Fish & Game Code Sections 1600-1616 and CWA Sections 401 and 404). In addition, Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would further minimize or mitigate the effects of surface hydrology alterations. Mitigation Measure VEG-1d would require revegetation or restoration of tempo-rarily disturbed areas, including drainage features. Mitigation Measure VEG-1e would require compen-sation for permanent habitat loss, including drainage features. And Mitigation Measure VEG-3a would require restoration or compensation to achieve no net loss of wetland and watercourse habitat values. Taken together, these measures would effectively avoid or mitigate the Proposed Project's adverse impacts to biological resources within jurisdictional waters.	There should be no need to prepare an Erosion Control Plan (ECP) if a Storm Water Pollution Prevention Plan (SWPPP) is to be prepared and implemented. Please make the following revision: Potential impacts to jurisdictional drainages would be reduced through implementation of a Storm Water Pollution Prevention Plan (SWPPP) including Best Management Practices (BMPs) as described in Section 4.9 of the PEA (see page 4.9-21), and compliance with the conditions set forth in State and fede-ral permits or authorizations (California Fish & Game Code Sections 1600-1616 and CWA Sections 401 and 404). ~~In addition, Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would further minimize or mitigate the effects of surface hydrology alterations.~~ Mitigation Measure VEG-1d would require revegetation or restoration of tempo-rarily disturbed areas, including drainage features. Mitigation Measure VEG-1e would require compen-sation for permanent habitat loss, including drainage features. And Mitigation Measure VEG-3a would require restoration or compensation to achieve no net loss of wetland and watercourse habitat values. Taken together, these measures would effectively avoid or mitigate the Proposed Project's adverse impacts to biological resources within jurisdictional waters.
D.4-51	**No net wetlands loss and watercourse impacts minimization.** SCE shall prepare an HMMP which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. The no net loss standard shall be reached through (1) ecological restoration of temporarily disturbed areas to fully replace habitat extent and habitat value, and (2) compensation at a ratio of 1:1 to replace permanently impacted non-wetland jurisdictional areas, and at 3:1 to replace permanently impacted state or federally jurisdictional wetland areas. Restoration and compensation mitigation for impacts to jurisdictional waters shall conform to the requirements of Mitigation Measures VEG-1d (Restore or revegetate temporary disturbance areas) and VEG-1e (Compensate for permanent habitat loss). All wetlands and water-courses, whether intermittent or perennial, will be retained to the extent feasible, and appropriate setbacks or other means will be employed to prevent adverse impacts to sur-face waters or associated habitat values. The HMMP shall be subject to review and approval by the CPUC and BLM. All restoration or compensation mitigation described in the HMMP shall be implemented in full.	The mitigation measure should defer to the HMMP and the applicable permit for wetland mitigation requirements. is the mitigation ratio should be modified to reflect a typical ratio for non-wetland jurisdictional areas. . Please make the following revision: **No net wetlands loss and watercourse impacts minimization.** SCE shall prepare an HMMP which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. The no net loss standard shall be reached through (1) ecological restoration <u>or revegetation</u> of temporarily disturbed areas to fully replace habitat extent and habitat value, and (2) compensation ~~at a ratio of 1:1 to replace permanently impacted non-wetland jurisdictional areas, and at 3:1 to replace permanently impacted state or federally jurisdictional wetland areas~~ <u>at a mitigation ratio determined by the wetland/water permitting agencies during the 401/404 and 1602 permitting process</u>. Restoration and compensation mitigation for impacts to jurisdictional waters shall conform to the requirements of Mitigation Measures VEG-1d (Restore or revegetate temporary disturbance areas) and VEG-1e (Compensate for permanent habitat loss). All wetlands and water-courses, whether intermittent or perennial, will be retained to the extent feasible, and appropriate setbacks or other means will be employed to prevent adverse impacts to sur-face waters or associated habitat values. The HMMP <u>will incorporate permit requirements and</u> shall be subject to review and approval by the CPUC and BLM. All restoration or compensation mitigation described in the HMMP shall be implemented in full. <u>This mitigation measure will be superseded by the requirements of water permits.</u>
D.4-53	SCE shall conduct focused surveys for federal- and state-listed and other special-status plants. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 ranked species) impacted by project activities shall be documented in pre-construction survey reports.	Some species can already be determined as absent and SCE should not have to continue to survey for absent shrubs. Please make the following revision: SCE shall conduct focused surveys for federal- and state-listed and other special-status plants, <u>except for species already determined to be absent</u>. All special-status plant species (including listed threatened or endangered species, and all CRPR 1A, 1B, 2, 3, and 4 ranked species) impacted by project activities shall be documented in pre-construction survey reports.
D.4-53	**Preconstruction Survey.** (Second Paragraph)	Please make the following revision:

	If federally listed plants would be affected, SCE shall notify BLM and USFWS to review obtain the appropriate permits from CDFW and USFWS and comply with permit requirements. Additional conservation measures to protect or restore listed plant species or their habitat may be required by BLM, CDFW, or USFWS before impacts are authorized.	If state or federally listed plants would be affected, SCE shall notify CDFW ~~BLM~~ and USFWS to ~~review~~ obtain the appropriate permits ~~from CDFW and USFWS~~ and comply with permit requirements. Additional conservation measures to protect or restore listed plant species or their habitat may be required by BLM, CDFW, or USFWS before impacts are authorized.
D.4-53 through 54	**Native cactus and *Yucca*.** Most native cactus and shrubby *Yucca* species (Joshua tree and Mohave yucca) can be successfully salvaged and transplanted, and yuccas often provide an important vertical component to wildlife habitat. Therefore, native cactus (excluding chollas in the genus *Cylindropuntia*) and yuccas (excluding chaparral yucca, *Y. whipplei*), shall be avoided or salvaged according to the strategies described below.	The regulatory basis for this measure is not clear in the DEIR/DEIS. Avoidance can be done to the extent possible; however, barrel cactus (and other non-*Cylindropuntia* cacti) are prevalent in the eastern portions of the Proposed Project in numbers that may prove infeasible for translocation. The linear nature of the project would also allow wildlife to continue to use adjacent vertical vegetation components reducing the significance of removal of these types of plants to construct the project. Without a regulatory basis or significant impact under CEQA/NEPA, removal of this discussion is requested. ~~**Native cactus and *Yucca*.** Most native cactus and shrubby *Yucca* species (Joshua tree and Mohave yucca) can be successfully salvaged and transplanted, and yuccas often provide an important vertical component to wildlife habitat. Therefore, native cactus (excluding chollas in the genus *Cylindropuntia*) and yuccas (excluding chaparral yucca, *Y. whipplei*), shall be avoided or salvaged according to the strategies described below.~~
D.4-54	**Avoidance.** (Last Sentence of Section) At minimum, the buffer for trees or shrubs species shall be equal to twice the drip line (i.e., two times the distance from the trunk to the canopy edge) to protect and preserve the root systems. The buffer for herbaceous species shall be a minimum of 50 feet from the perimeter of the occupied habitat or the individual. If a smaller buffer is necessary due to other project constraints, SCE will develop and implement site-specific monitoring and put other measures in place to avoid the take of the species, with the approval of the CPUC and BLM, in consultation with USFWS and CDFW.	The requirement for an avoidance buffer for trees to be twice the distance of the drip line is excessive, particularly for non-listed species. Typically the avoidance buffer is out to the edge of the dripline. Please make the following revisions: At minimum, the buffer for trees or shrubs species shall be equal to ~~twice~~ the drip line (i.e., ~~two times the distance~~ from the trunk to the canopy edge) to protect and preserve the root systems. The buffer for herbaceous species shall be a minimum of ~~50~~10 feet from the perimeter of the occupied habitat or the individual. If a smaller buffer is necessary due to other project constraints, SCE will ~~develop and~~ implement site-specific monitoring and put other measures in place to avoid the take of the species, with the approval of the CPUC and BLM, in consultation with USFWS and CDFW.
D.4-54	**Off-site compensation**. SCE shall provide compensation lands consisting of habitat occupied by the impacted CRPR 1 or 2 ranked plants at a 1:1 ratio of acreage and number of plants for any occupied habitat affected by the project. Occupied habitat will be calculated on the project site and on the compensation lands as including each special status plant occurrence and a surrounding 100-foot buffer area. Off-site compensation shall be incorporated into the project's Habitat Compensation Plan (under Mitigation Measure VEG-1e), for review and approval by the CPUC and BLM in consultation with CDFW and USFWS.	The measure as currently written would be very difficult to implement. The count for individuals should be restricted to herbs, shrubs and trees or a density/acre count, depending on species. For example, it would be difficult to count the number of individual grasses, especially as growth patterns may not allow for individual counts. In addition, SCE should not have to categorically mitigate for a 100-foot buffer around each population because the buffer may not include suitable soils/habitat for the species. SCE recommends translocation, seed collection and re-seeding, or other *onsite* mitigation options as an alternative to off-site compensation for special status plants as described in APM Bio-7. (This measure is for SB County, BLM and Morongo only.) For the reasons stated above, please make the following revision: ~~**Off-site compensation**. SCE shall provide compensation lands consisting of habitat occupied by the impacted CRPR 1 or 2 ranked plants at a 1:1 ratio of acreage and number of plants for any occupied habitat affected by the project. Occupied habitat will be calculated on the project site and on the compensation lands as including each special status plant occurrence and a surrounding 100-foot buffer area. Off-site compensation shall be incorporated into the project's Habitat Compensation Plan (under Mitigation Measure VEG-1e), for review and approval by the CPUC and BLM in consultation with CDFW and USFWS.~~

D.4-54	**Salvage.** SCE shall consult with horticulturists at a qualified institution such as Rancho Santa Ana Botanic Garden (RSABG) regarding the feasibility and likely success of salvage efforts for each species.	There are other qualified specialists SCE can consult other than horticulturalists at qualified institutions. Please make the following revision: **Salvage.** SCE shall consult with a qualified restoration ecologist or a horticulturists at a qualified institution such as Rancho Santa Ana Botanic Garden (RSABG) regarding the feasibility and likely success of salvage efforts for each species.
D.4-55	For cacti and yuccas, the goal shall be maximum practicable survivorship of salvaged plants. The Plan will include at minimum: (a) species and locations of plants identified for salvage; (b) criteria for determining whether an individual plant is appropriate for salvage; (c) the appropriate season for salvage; (d) equipment and methods for collection, transport, and re-planting plants or seed banks, to retain intact soil conditions and maximize success; (e) for shrubs, cacti, and yucca, a requirement to mark each plant to identify the north-facing side prior to transport, and replant it in the same orientation; (f) details regarding storage of plants or seed banks for each species; (g) location of the proposed recipient site, and detailed site preparation and plant introduction techniques for top soil storage, as applicable; (h) a description of the irrigation, weed control, and other maintenance activities; (i) success criteria, including specific timeframe for survivor-ship and reproduction of each species; and (j) a detailed monitoring program, commensurate with the Plan's goals.	See comment to "Native cactus and *Yucca"* section on Page D.5-53, above. The regulatory need for this mitigation is not clear in the DEIR/DEIS and deleting the requirement to salvage cacti and yucca is recommended, unless they are special-status species: ~~For cacti and yuccas, the goal shall be maximum practicable survivorship of salvaged plants.~~ The Plan will include at minimum: (a) species and locations of plants identified for salvage; (b) criteria for determining whether an individual plant is appropriate for salvage; (c) the appropriate season for salvage; (d) equipment and methods for collection, transport, and re-planting plants or seed banks, to retain intact soil conditions and maximize success; (e) for shrubs, ~~cacti, and yucca,~~ a requirement to mark each plant to identify the north-facing side prior to transport, and replant it in the same orientation; (f) details regarding storage of plants or seed banks for each species; (g) location of the proposed recipient site, and detailed site preparation and plant introduction techniques for top soil storage, as applicable; (h) a description of the irrigation, weed control, and other maintenance activities; (i) success criteria, including specific timeframe for survivorship and reproduction of each species; and (j) a detailed monitoring program, commensurate with the Plan's goals.
D.4-55	**VEG-5b Ensure MSHCP equivalency and consistency.** If SCE does not obtain PSE status under either the WR-MSHCP or CV-MSHCP, SCE shall prepare an analysis equivalent to the WR-MSHCP Consistency Analysis or the CV-MSHCP Joint Project Review Requirements, as appropriate. This analysis shall identify any potential conflict with the WR-MSHCP or CV-MSHCP and specify detailed measures that it will implement, as a non-participant in either plan, to pre-vent such conflict through habitat compensation or other measures. The analysis and its included specifications for avoiding MSHCP conflicts shall be subject to review and approval by CPUC and BLM, in consultation with CDFW, USFWS, the Western Riverside County Regional Conservation Authority, and the CVCC. The analysis and full implementation of each measure shall be completed prior to the start of any ground-disturbing activity within the WR-MSHCP or CV-MSHCP area. **Implementation locations:** WR-MSHCP (all, if SCE does not obtain PSE status); CV-MSHCP (all, if SCE does not obtain PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).	CEQA Guidelines state that impacts may be significant if the project would: • Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Conflicting with the plans described in the CEQA guidelines is not the same as failing to demonstrate equivalency/consistency as if the project proponent were a PSE. As such, if SCE does not obtain PSE Status, appropriate state and federal endangered species act permits and conditions would be applied to the project. Please make the following revision: **VEG-5b Ensure MSHCP ~~equivalency and~~ consistency.** If SCE does not obtain PSE status under either the WR-MSHCP or CV-MSHCP, SCE shall prepare an analysis to demonstrate that the project does not conflict with these MSHCPs. ~~equivalent to the WR-MSHCP Consistency Analysis or the CV-MSHCP Joint Project Review Requirements, as appropriate~~. This analysis shall identify any potential conflict with the WR-MSHCP or CV-MSHCP and specify detailed measures that it will implement, as a non-participant in either plan, to prevent such conflict through habitat compensation or other measures. The analysis and its included specifications for avoiding MSHCP conflicts shall be subject to review and approval by CPUC and BLM, in consultation with CDFW, USFWS, the Western Riverside County Regional Conservation Authority, and the CVCC. The analysis and full implementation of each measure shall be completed prior to the start of any ground-disturbing activity within the WR-MSHCP or CV-MSHCP area.
D.4-73 through D.4-77	**D.4.4.3 Phased Build Alternative** ***Impact VEG-1: Land clearing for construction and future operations and maintenance would cause loss or degradation of vegetation and habitat, including sensitive habitats*** ***Impact VEG-2: Project activities could cause indirect degradation of surrounding vegetation and habitat from dust, interrupted sand transport, interruption of surface water flows, or introduction and spread of invasive weeds***	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements require additional survey and/or study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional biological impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

	Impact VEG-3: Construction, operations, and maintenance activities would affect state or federally jurisdictional waters and wetlands through vegetation removal, placement of fill, erosion, sedimentation, or degradation of water quality ***Impact VEG-4: Construction, operations, and maintenance activities could cause direct or indirect loss of listed and special-status plants and direct or indirect effects to habitat for listed and special-status plants*** ***Impact VEG-5: Construction, operations, and maintenance activities may conflict with local policies or ordinances protecting biological resources, Habitat Conservation Plans, Natural Communities Conservation Plans, Multiple Species Habitat Conservation Plans, or other approved local, regional, state, or federal conservation plans***	
D.4-80	Mitigation Measure Veg-1d: Restore or revegetate temporary disturbance areas	Timing should be negotiable if success criteria is met sooner and subsequent follow-up monitoring demonstrates continued success of a restoration site within five years. Please revise as follows: **MITIGATION MEASURE** — **VEG-1d: Restore or revegetate temporary disturbance areas *(see full text in Section D.4.3.3)*** **Location** — All segments. **Monitoring / Reporting Action** — SCE submits Habitat Restoration and Revegetation Plan and annual monitoring reports; CPUC/BLM monitor approves plan and report format and content in consultation with CDFW and USFWS. **Effectiveness Criteria** — Restoration/revegetation of all temporary disturbance areas, including sensitive vegetation and special-status species habitat. **Responsible Agency** — CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS. **Timing** — Within 12 months from the start of construction; restoration phase; for ~~at least~~ 5 years post-construction or at such time as performance standards are met.

D.4-81	**Table D.4-7. Mitigation Monitoring Program Biological Resources – Vegetation** **VEG-2a** **Monitoring / Reporting Action**: SCE submits Integrated Weed Management Plan; CPUC/BLM monitoring approves plan in consultation with CDFW and USFWS. SCE conducts weed inventory/mapping and monitoring. SCE documents construction vehicle and equipment washing and submits documentation to CPUC/BLM monitor upon request. SCE submits monitoring reports to CPUC/BLM monitor as specified in Integrated Weed Management Plan. **Effectiveness Criteria**: Minimize introduction and spread of invasive plants. **Responsible Agency**: CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS. **Timing**: At least 60 days prior to SCE's application for Notice to Proceed; pre-construction, construction, post-construction restoration, and O&M phases.	As acknowledged in this impact assessment, the project ROW is already ~~heavily infested~~ populated with weeds. Upon completion of implementation of the IWMP (through the post-construction restoration period), SCE should not be obligated to monitor and survey during O&M of the line. SCE recommends the following revisions: **Table D.4-7. Mitigation Monitoring Program – Biological Resources – Vegetation** **Monitoring / Reporting Action**: SCE submits Integrated Weed Management Plan; CPUC/BLM monitoring approves plan in consultation with CDFW and USFWS. SCE conducts weed inventory/mapping and monitoring. SCE documents construction vehicle and equipment washing and submits documentation to CPUC/BLM monitor upon request. SCE submits monitoring reports to CPUC/BLM monitor as specified in Integrated Weed Management Plan. **Effectiveness Criteria**: Minimize introduction and spread of invasive plants. **Responsible Agency**: CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS. **Timing**: At least 60 days prior to SCE's application for Notice to Proceed; pre-construction, construction, and post-construction restoration phases.~~,~~ ~~and O&M phases~~.
D.4-81	**MITIGATION MEASURE**: **VEG-3a: Minimize impacts and ensure no net loss for jurisdictional waters and wetlands *(see full text in Section D.4.3.3)*** **Location**: All segments. **Monitoring / Reporting Action**: SCE submits a Habitat Mitigation and Monitoring Plan for affected jurisdictional areas; USACE, CDFW, RWQCB, and CPUC/BLM approve plan. **Effectiveness Criteria**: Minimize impacts to jurisdictional waters and wetlands and mitigate for unavoidable impacts through ecological restoration of temporarily disturbed areas and compensation for permanently disturbed areas. **Responsible Agency**: CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS, USACE, CDFW, RWQCB. **Timing**: Prior to, during, and after construction.	**MITIGATION MEASURE**: **VEG-3a: Minimize impacts and ensure no net loss for jurisdictional waters and wetlands *(see full text in Section D.4.3.3)*** **Location**: All segments. **Monitoring / Reporting Action**: SCE submits a Habitat Mitigation and Monitoring Plan for affected jurisdictional areas; USACE, CDFW, SWRCB, EPA,~~RWQCB,~~ and CPUC/BLM approve plan. **Effectiveness Criteria**: Minimize impacts to jurisdictional waters and wetlands and mitigate for unavoidable impacts through ecological restoration of temporarily disturbed areas and compensation for permanently disturbed areas. **Responsible Agency**: CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS, USACE, CDFW, ~~RWQCB~~SWRCB, EPA. **Timing**: Prior to, during, and after construction.

BIOLOGICAL RESOURCES – WILDLIFE		
D.5-9	Golden eagle has a low potential for occurrence on Segment 2. Foraging habitat is potentially present on the ROW and natural nesting habitat is potentially present within 4 miles of the ROW. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.	According to the Golden Eagle survey report (Appendix I to the BRTR (App. F of the PEA)), the only natural nesting habitat within 4 miles of the ROW is south of Banning, not near Segment 2. Please make the following revision: Golden eagle has a low potential for occurrence on Segment 2. Foraging habitat is potentially present on the ROW ~~and natural nesting habitat is potentially present within 4 miles of the ROW~~. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.
D. 5-10	Golden eagle has been observed foraging near El Casco Substation on or near Segment 3. Natural nesting habitat is potentially present within 4 miles of the ROW. Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.	According to the Golden Eagle survey report (Appendix I to the BRTR (App. F of the PEA)), the only natural nesting habitat within 4 miles of the ROW is south of Banning and south of Segments 4 and 5, not near Segment 3. Please make the following revision: Golden eagle has been observed foraging near El Casco Substation on or near Segment 3. ~~Natural nesting habitat is potentially present within 4 miles of the ROW.~~ Golden eagles may occasionally nest on large transmission towers, but the potential for nesting on the ROW is low.
D.5-13	The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 5. It was reported from the San Gorgonio River, approximately 2.5 miles south of the ROW, but the habitat where the transmission line would span the San Gorgonio River is not suitable (CPUC and BLM, 2006).	All CNDDB records for Sierra Madre (mountain) yellow-legged frog are listed as either extirpated or potentially extirpated. This should be noted in the DEIR/DEIS. Please make the following revision: The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 5. It was reported from the San Gorgonio River, approximately 2.5 miles south of the ROW, but the habitat where the transmission line would span the San Gorgonio River is not suitable (CPUC and BLM, 2006). <u>Further, all records for this species in the San Gorgonio Pass area are assumed to be extirpated.</u>
D.5-14	The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 6. There is a documented occurrence in the Whitewater River, approximately 3 miles north of I-10, but the habitat where the ROW crosses Whitewater Canyon is probably not suitable for this species due to intermittent surface flow. This species was not found during biological surveys (AMEC, 2012a).	For consistency with the comment above at 5-13, please make the following revision: The Sierra Madre (mountain) yellow-legged frog has a low potential for occurrence on Segment 6. There is a documented occurrence in the Whitewater River, approximately 3 miles north of I-10, but the habitat where the ROW crosses Whitewater Canyon is probably not suitable for this species due to intermittent surface flow. This species was not found during biological surveys (AMEC, 2012a). <u>Further, all records for this species in the San Gorgonio Pass area are assumed to be extirpated.</u>
D.5-25	**WIL-1a Conduct pre-construction biological resources surveys.** SCE shall assign qualified biologists to perform pre-construction biological surveys at each project work area and access route, and in the 500-foot area surrounding each work site or access route. Pre-construction sur-veys shall be planned and implemented to identify locations of special-status plants and wildlife and nesting birds occurring at work areas, other portions of the ROW, or in adjacent buffer areas. Specific pre-construction survey methods or protocols will vary according to the resources which may be present at any given site, and according to season. At minimum, SCE shall complete pre-construction surveys 10 days prior to beginning work in any given area, and repeat the surveys if the work site remains inactive for a period of ten days or more. During nesting season, a qualified biologist shall complete nesting bird surveys no more than four days prior to beginning work at any given area, and repeat the surveys regularly so long as work continues at the site during the nesting season.	A 500-foot buffer is unreasonable for most wildlife species and for some project features (e.g., access roads). Buffers will vary as appropriate based on habitat and target species, and as stipulated by project work plans and mitigation plans (e.g., NBMP). Due to the extensive network of existing access roads along portions of the project, it may not be feasible to complete pre-construction surveys within 10-days of construction along the existing access road and a 500 ft. buffer (based on special status species potential), particularly along Segments 2 and 3. As a result, this mitigation measure may not be possible to implement. Consistent with other terrestrial sensitive species surveys buffers, such as desert tortoise and Stephens' kangaroo-rat, the survey area should be limited to a resource and suitable habitat dependent buffer around the disturbance areas. Access roads that require heavy road improvement will also be surveyed out to the appropriate species specific survey buffer, 10 days prior to beginning road improvement work. Otherwise, access roads will not be surveys if they are only being used to travel between work areas.

		Suggested Revision: **WIL-1a Conduct pre-construction biological resources surveys.** SCE shall assign qualified biologists to perform pre-construction biological surveys at each project work area ~~and access route~~, and ~~in the~~ in a buffer up to 500-feet ~~foot area~~ surrounding each work site ~~or access route~~. Buffers areas will vary as appropriate based on habitat and target species, and as stipulated by project work plans and mitigation plans (e.g., NBMP). Access roads that require heavy road improvement will also be surveyed out to the appropriate species specific survey buffer, 10 days prior to beginning road improvement work. Otherwise, access roads will not be surveyed if they are only being used to travel between work areas. Pre-construction sur-veys shall be planned and implemented to identify locations of special-status plants and wildlife and nesting birds occurring at work areas, other portions of the ROW, or in adjacent buffer areas. Specific pre-construction survey methods or protocols will vary according to the resources which may be present at any given site, and according to season. At minimum, SCE shall complete pre-construction surveys 10 days prior to beginning work in any given area, and repeat the surveys if the work site remains inactive for a period of ten days or more. During nesting season, a qualified biologist shall complete nesting bird surveys no more than four days prior to beginning work at any given area, and repeat the surveys regularly so long as work continues at the site during the nesting season.
D.5-27	**WIL-1b** **Wildlife netting or exclusion fencing.** SCE may install temporary or permanent netting or fencing around equipment, work areas, or project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes, or prevent birds from nesting on equip-ment or facilities. Bird deterrent netting will be maintained free of holes and will be deployed and secured on the equipment in a manner that, insofar as possible, prevents wildlife from becoming trapped inside the netted area or within the excess netting. The biological monitor will inspect netting (if installed) twice daily, at the beginning and close of each work day. The biological monitor will inspect exclusion fence (if installed) weekly and will inform SCE of any needed repairs; SCE shall promptly repair any damage to the exclu-sion fencing.	Please make the following revision for consistency with the monitoring of netting as discussed as part of the Nesting Bird Management Plan: **Wildlife netting or exclusion fencing.** SCE may install temporary or permanent netting or fencing around equipment, work areas, or project facilities to prevent wildlife exposure to hazards such as toxic materials or vehicle strikes, or prevent birds from nesting on equip-ment or facilities. Bird deterrent netting will be maintained free of holes and will be deployed and secured on the equipment in a manner that, insofar as possible, prevents wildlife from becoming trapped inside the netted area or within the excess netting. Netting installed within established material yards will be inspected daily. The biological monitor will inspect netting that is installed on vegetation (if installed) twice daily, at the beginning and close of each work day. The biological monitor will inspect exclusion fence (if installed) weekly and will inform SCE of any needed repairs; SCE shall promptly repair any damage to the exclu-sion fencing.
D.5-27	**Dead animals.** Dead animals of non-special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate local animal control agency within 24 hours. A biological monitor shall safely move the carcass out of the road or work area as needed. Dead animals of special-status species found on project roads, work areas, or the ROW shall be reported to CDFW within one work day and the carcass handled as directed by CDFW.	Please make the following revision: **Dead animals.** Dead animals of non-special-status species found on project unpaved roads, work areas, or the ROW shall be reported to the appropriate local animal control agency within 24 hours. A biological monitor shall safely move the carcass out of the road or work area as needed. Dead animals of special-status species found on unpaved project roads, work areas, or the ROW shall be reported to CDFW within one work day and the carcass handled as directed by CDFW.
D.5-27 through 28	**Injured wildlife.** SCE shall create and implement guidelines for dealing with injured or entrapped wildlife found on or near project roads, work areas, or the ROW, whether or not the injuries are project-related, and provide these guidelines to all biological monitors. If an animal is entrapped, a qualified biological monitor shall free the animal if feasible, or work with construction crews to free the animal, in compliance with applicable safety regulations and project requirements. If biological monitors cannot free the animal or the animal is too large or dangerous for monitors to handle, SCE shall contact and work with animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible. SCE shall ensure that one or more qualified biological monitors receive training in the safe and proper handling and transport of injured wildlife and are provided with the appropriate equipment. These trained and equipped monitors shall be available to capture and trans-port injured wildlife to a local	SCE should only be responsible for project-related wildlife injuries. As such please make the following revisions: **Injured wildlife.** SCE shall create and implement guidelines for dealing with injured or entrapped wildlife found on or near project roads, work areas, or the ROW, ~~whether or not the injuries are project-related,~~ and provide these guidelines to all biological monitors. If an animal is entrapped, a qualified biological monitor shall free the animal if feasible, or work with construction crews to free the animal, in compliance with applicable safety regulations and project requirements. If biological monitors cannot free the animal or the animal is too large or dangerous for monitors to handle, SCE shall contact and work with animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible. SCE shall ensure that one or more qualified biological monitors receive training in the safe and proper handling and transport of injured wildlife and are provided with the appropriate equipment. These trained and equipped monitors shall be available to capture and trans-port injured wildlife to a local wildlife rehabilitator or veterinarian as needed. If the injured animal is too

	wildlife rehabilitator or veterinarian as needed. If the injured animal is too large or dangerous for monitors to handle, or a trained and equipped monitor is not available, SCE shall contact and work with a local wildlife rehabilitator, animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible. SCE shall bear the costs of veterinary treatment and rehabilitation for any injured wildlife found on or near project roads, work areas, or the ROW and any wildlife injured by project-related activities. Additionally, any entrapped or injured special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate resource agency within one work day.	large or dangerous for monitors to handle, or a trained and equipped monitor is not available, SCE shall contact and work with a local wildlife rehabilitator, animal control, CDFW, or other qualified party to obtain assistance for the animal as soon as possible. SCE shall bear the costs of veterinary treatment and rehabilitation for any ~~injured~~ wildlife ~~found on or near project roads, work areas, or the ROW and any wildlife~~ injured by project-related activities. Additionally, any entrapped or injured special-status species found on project roads, work areas, or the ROW shall be reported to the appropriate resource agency within one work day.
D.5-28	**Rattlesnake guidelines.** Prior to the start of construction, SCE shall prepare and implement guidelines for dealing with rattlesnakes found in or near project work areas and access roads and provide these guidelines to all biological monitors, safety staff, and other personnel. Killing or harming rattlesnakes or other wildlife is not authorized. If SCE determines that it is appropriate for biological monitors or other project personnel to handle rattlesnakes, SCE shall ensure that an adequate number of qualified individuals are trained in the safe and proper handling of rattlesnakes and provided with the appropriate safety and snake han-dling equipment, including a secure storage container for transporting snakes. These trained and equipped individuals shall be available to remove rattlesnakes found in or near project work areas and access roads as needed and relocate them to appropriate nearby habitat. Other project personnel shall not harass, or handle rattlesnakes, except as required to main-tain immediate safety or in accordance with the guidelines developed by SCE. Handling and relocation of rattlesnakes shall be documented, and the species of rattlesnake determined whenever possible. If a special-status rattlesnake is relocated, documentation shall be sub-mitted to CPUC, BLM, and CDFW. Alternately, SCE may determine that project personnel shall not handle or approach rattle-snakes. If so, the guidelines shall specify an alternate course of action for rattlesnake encounters, such as avoiding work activity near the snake and monitoring its location and activity until it leaves the area.	Prior to the start of construction, SCE will prepare and implement a Worker Environmental Awareness Program (WEAP) that includes guidelines for handling and/or avoiding rattlesnakes. The section below is therefore redundant and does not mitigate a specific significant impact. Please make the following revision: ~~**Rattlesnake guidelines.** Prior to the start of construction, SCE shall prepare and implement guidelines for dealing with rattlesnakes found in or near project work areas and access roads and provide these guidelines to all biological monitors, safety staff, and other personnel. Killing or harming rattlesnakes or other wildlife is not authorized. If SCE determines that it is appropriate for biological monitors or other project personnel to handle rattlesnakes, SCE shall ensure that an adequate number of qualified individuals are trained in the safe and proper handling of rattlesnakes and provided with the appropriate safety and snake han-dling equipment, including a secure storage container for transporting snakes. These trained and equipped individuals shall be available to remove rattlesnakes found in or near project work areas and access roads as needed and relocate them to appropriate nearby habitat. Other project personnel shall not harass, or handle rattlesnakes, except as required to main-tain immediate safety or in accordance with the guidelines developed by SCE. Handling and relocation of rattlesnakes shall be documented, and the species of rattlesnake determined whenever possible. If a special-status rattlesnake is relocated, documentation shall be sub-mitted to CPUC, BLM, and CDFW. Alternately, SCE may determine that project personnel shall not handle or approach rattle-snakes. If so, the guidelines shall specify an alternate course of action for rattlesnake encounters, such as avoiding work activity near the snake and monitoring its location and activity until it leaves the area.~~
D.5-28 through 31	**WIL-1c Prepare and implement a Nesting Bird Management Plan.** [Supersedes APM BIO-3] SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with CPUC, BLM, CDFW, and USFWS. The NBMP shall describe methods to minimize potential project effects to nesting birds, and avoid any potential for unauthorized take. Project-related disturbance including construction and pre-construction activities shall not proceed until approval of the NBMP by CPUC and BLM in consultation with CDFW and USFWS. **NBMP Content.** The NBMP shall include: (1) definitions of standard nest buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become nec-essary under special circumstances; (4) a rigorous monitoring protocol including qualifica-tions of monitors, monitoring schedule, and field methods, to ensure that any project-related effects to nesting birds will be minimized; and (5) a protocol for documenting and reporting any inadvertent contact or effects to birds or nests. The paragraphs below describe the NBMP requirements in further detail.	The following revisions to WIL-1c are requested due to the redundant detail included in the measure which will be included in the required Nesting Bird Management Plan. Having this level of detail in the Mitigation Measure may result in potential conflicts with the Nesting Bird Management Plan, which is intended to be an adaptive plan. In the unlikely event that a Nesting Bird Management Plan is not approved prior to the start of construction, a default buffer of 300 feet for common bird species and 500 feet for special status species would be implemented to avoid take of active bird nests. In addition, required avian surveys should begin Feb 1; however, general pre-construction surveys and sweeps would begin focusing on potential raptor and raven nesting as early as January 1. For the reasons above, please make the following revisions: **WIL-1c Prepare and implement a Nesting Bird Management Plan.** [Supersedes APM BIO-3] SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with CPUC, BLM, CDFW, and USFWS. The NBMP shall describe methods to minimize potential project effects to nesting birds, and avoid any potential for unauthorized take. Project-related disturbance

Background. The Background section of the NBMP shall include the following:

□□A summary of applicable state and federal laws and regulations, including definition of what constitutes a nest or active nest under state and federal law. This section shall describe SCE's proposed applicability of the NBMP in the event that state or federal regu-lations affecting nesting birds may be revised before project implementation.

□□A list of bird species potentially nesting on or near the ROW or other work areas, indicat-ing approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, veg-etation, structures, etc.), tolerance to disturbance (if known) and any conservation status for each species. This section will also note any species that do not require avoidance measures (e.g., rock pigeons).

□□A list of the types of project activities (construction, operations, and maintenance) that may occur during nesting season, with a short description of the noise, physical distur-bance, and lighting resulting from each activity.

□□A discussion of project activity scheduling, to avoid or minimize project impacts to nesting birds. Clearing of any vegetation, site preparation in open or barren areas, or other project-related activities that may adversely affect breeding birds shall be scheduled outside the nesting season, as feasible.
Pre-construction nest surveys. Pre-construction nest surveys will be conducted prior to any construction activities scheduled during the breeding period. For this project, the breeding period will be defined as January 1 through August 31. The NBMP shall describe the pro-posed field methods, survey timing, and qualifications of field biologists. Field biologist qual-ifications will be subject to review by CPUC and BLM. The biologists conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques such as those described in Martin and Guepel (1993). Nest surveyors will be instructed to focus their efforts on bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). Surveys shall be conducted in accordance with the following guidelines.

□□Surveys shall cover all potential nesting habitat within the ROW or other work areas and access routes and within 500 feet of these areas (100 feet for access routes). Where the 500-foot distance extends onto private property, SCE will make a reasonable effort to obtain permission to access the property for the surveys but, if permission cannot be obtained, then binocular surveys from the ROW boundary may be substituted for standard field survey methods.

□□Pre-construction surveys shall be conducted for each work area, no longer than 10 days prior to the start of construction activity. Additional follow-up surveys may be required if periods of construction inactivity exceed one week in any given area (an interval during which birds may establish a nesting territory and initiate egg laying and incubation).

□□Prior to the start of any nesting season construction activities, SCE shall provide the CPUC and BLM a report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); a list of species observed; and electronic data identifying nest locations and the boundaries of buffer zones. The electronic data set will be updated regularly throughout the nesting season. The format and contents of this report will be described in the draft NBMP and will be subject to review and approval by CPUC and BLM.

including construction and pre-construction activities shall not proceed within 300 feet of common bird species (500 feet for raptors, special-status species or listed threatened or endangered species, except for golden eagle as described in WIL-2f) until approval of the NBMP by CPUC and BLM in consultation with CDFW and USFWS.

NBMP Content. The NBMP shall include: (1) definitions of ~~standard~~ default nest avoidance buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become nec-essary ~~under special circumstances~~; (4) a rigorous monitoring protocol including qualifica-tions of monitors, monitoring schedule, and field methods, to ensure that any project-related effects to nesting birds will be minimized; and (5) a protocol for documenting and reporting any inadvertent contact or effects to birds or nests.

~~The paragraphs below describe the NBMP requirements in further detail.~~

~~**Background.** The Background section of the NBMP shall include the following:~~

~~□□A summary of applicable state and federal laws and regulations, including definition of what constitutes a nest or active nest under state and federal law. This section shall describe SCE's proposed applicability of the NBMP in the event that state or federal regu-lations affecting nesting birds may be revised before project implementation.~~

~~□□A list of bird species potentially nesting on or near the ROW or other work areas, indicat-ing approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, veg-etation, structures, etc.), tolerance to disturbance (if known) and any conservation status for each species. This section will also note any species that do not require avoidance measures (e.g., rock pigeons).~~

~~□□A list of the types of project activities (construction, operations, and maintenance) that may occur during nesting season, with a short description of the noise, physical distur-bance, and lighting resulting from each activity.~~

~~□□A discussion of project activity scheduling, to avoid or minimize project impacts to nesting birds. Clearing of any vegetation, site preparation in open or barren areas, or other project-related activities that may adversely affect breeding birds shall be scheduled outside the nesting season, as feasible.~~
Pre-construction nest surveys. Pre-construction nest surveys will be conducted prior to any construction activities scheduled during the breeding period. For this project, the breeding period will be defined as ~~January~~ February 1 through August 31. Pre-construction surveys and sweeps will begin focusing on potential raptor and raven nesting substrates as early as January 1. The NBMP shall describe the pro-posed field methods, survey timing, and qualifications of field biologists. Field biologist qual-ifications will be subject to review by CPUC and BLM. The biologists conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques such as those described in Martin and Guepel (1993). Nest surveyors will be instructed to focus their efforts on bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). ~~Surveys shall be conducted in accordance with the following guidelines.~~

~~□□Surveys shall cover all potential nesting habitat within the ROW or other work areas and access routes and within 500 feet of these areas (100 feet for access routes). Where the 500-foot distance extends onto private property, SCE will make a reasonable effort to obtain permission to access the property for the surveys but, if permission cannot be obtained, then binocular surveys from the ROW boundary may be substituted for standard field survey methods.~~

	Nest Buffers and Acceptable Activities The NBMP shall specify measures to delineate buffers on the work site, to consist of clearly visible marking and signage, as well as inspection procedures to ensure that markings and signage remain in place so long as the nest is active. Buffer locations shall be communicated to construction crews, inspectors, helicopter pilots, and other field personnel, and shall remain in effect until formally discontinued (when each nest is no longer active). The NBMP shall specify a procedure for written notification of release of nest buffer restrictions to field personnel when nests become inactive; these notifications shall be provided to CPUC, BLM, CDFW, and USFWS in daily reports. In addition, the NBMP shall specify measures to ensure the buffers are observed, including a direct communication and decision protocol to stop work within buffer areas. In some cases, active nests may be found while work is underway. Therefore, the NBMP shall include a protocol for stopping ongoing work within the buffer area, securing the work site, and removing personnel and equipment from the buffer. The NBMP shall describe proposed measures to avoid take or adverse effects to nests, such as buffer distances from active nests. These measures shall be based on the specific nature of the bird species and conservation status, and other pertinent factors. The NBMP will identify bird species (or groups of species) that are relatively tolerant or intolerant of human activities and specify smaller or larger buffer distances as appropriate for each species. If no information is available to specify a buffer distance for a species, then the NBMP shall specify 300 feet as a standard buffer distance, and 500 feet for raptors, special-status species or listed threatened or endangered species. All applicable avoidance measures, including buffer distances, must be continued until nest monitoring (below) confirms that the nestlings have fledged and dispersed, or the nest is no longer active. For each special-status species potentially nesting within or near project work areas, the NBMP shall specify applicable buffers and any additional nest protection measures, specialty monitoring, or restrictions on work activities. The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspection or BMP repair) including conditions and restrictions, and any monitor-ing required. The NBMP shall include pictorial representation showing buffer distances for ground buffers, vertical helicopter buffers, and horizontal helicopter buffers for nests near the ground and nests in towers. **Nest Buffer Modification or Reduction** At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist, approved by CPUC and BLM in consultation with the CDFW and USFWS. The NBMP shall provide a procedure and timing requirements for notifying CPUC, BLM, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format. **Nest deterrents.** The NBMP shall describe any proposed measures or deterrents to prevent or reduce bird nesting activity on project equipment or facilities, such as buoys, visual or auditory hazing	~~□□Pre-construction surveys shall be conducted for each work area, no longer than 10 days prior to the start of construction activity. Additional follow-up surveys may be required if periods of construction inactivity exceed one week in any given area (an interval during which birds may establish a nesting territory and initiate egg laying and incubation).~~ ~~□□Prior to the start of any nesting season construction activities, SCE shall provide the CPUC and BLM a report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity and qualifications of the surveyor(s); a list of species observed; and electronic data identifying nest locations and the boundaries of buffer zones. The electronic data set will be updated regularly throughout the nesting season. The format and contents of this report will be described in the draft NBMP and will be subject to review and approval by CPUC and BLM.~~ **Nest Buffers and Acceptable Activities** The NBMP shall specify measures to delineate buffers on the work site, to consist of clearly visible marking and signage, as well as inspection procedures to ensure that markings and signage remain in place so long as the nest is active. ~~Buffer locations shall be communicated to construction crews, inspectors, helicopter pilots, and other field personnel, and shall remain in effect until formally discontinued (when each nest is no longer active). The NBMP shall specify a procedure for written notification of release of nest buffer restrictions to field personnel when nests become inactive; these notifications shall be provided to CPUC, BLM, CDFW, and USFWS in daily reports. In addition, the NBMP shall specify measures to ensure the buffers are observed, including a direct communication and decision protocol to stop work within buffer areas. In some cases, active nests may be found while work is underway. Therefore, the NBMP shall include a protocol for stopping ongoing work within the buffer area, securing the work site, and removing personnel and equipment from the buffer.~~ ~~The NBMP shall describe proposed measures to avoid take or adverse effects to nests, such as buffer distances from active nests. These measures shall be based on the specific nature of the bird species and conservation status, and other pertinent factors.~~ ~~The NBMP will identify bird species (or groups of species) that are relatively tolerant or intolerant of human activities and specify smaller or larger buffer distances as appropriate for each species. If no information is available to specify a buffer distance for a species, then the NBMP shall specify 300 feet as a standard buffer distance, and 500 feet for raptors, special-status species or listed threatened or endangered species. All applicable avoidance measures, including buffer distances, must be continued until nest monitoring (below) confirms that the nestlings have fledged and dispersed, or the nest is no longer active.~~ ~~For each special-status species potentially nesting within or near project work areas, the NBMP shall specify applicable buffers and any additional nest protection measures, specialty monitoring, or restrictions on work activities.~~ ~~The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspection or BMP repair) including conditions and restrictions, and any monitor-ing required. The NBMP shall include pictorial representation showing buffer distances for ground buffers, vertical helicopter buffers, and horizontal helicopter buffers for nests near the ground and nests in towers.~~ **Nest Buffer Modification or Reduction** At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist, approved by CPUC and BLM in consultation with the CDFW and USFWS. ~~The NBMP shall provide a procedure and timing requirements for notifying CPUC, BLM, CDFW, and~~

	devices, bird repellents, securing of materials, and netting of materials, vehi-cles, and equipment. It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance and training for the contractor to properly install, maintain, and use nest deterrents; and daily monitoring of nest deterrents to ensure proper installation and functioning and prevent injury or entrapment of birds or other animals. In the event that an active nest is located on project facilities, materials or equipment, SCE will either (1) avoid disturbance or use of the facilities, mate-rials or equipment (e.g., by red-tag) until the nest is no longer active, or (2) coordinate with the CPUC, BLM, CDFW, and USFWS to obtain authorization to remove the nest. The NBMP shall describe the proposed procedure for removal of nests, including wildlife rehabilitation options. **Communication.** The NBMP shall specify the responsibilities of construction monitors in regards to nests and nest issues, and specify a direct communication protocol to ensure that nest information and potential adverse impacts to nesting birds can be promptly communi-cated from nest monitors to construction monitors, so that any needed actions can be taken immediately. The NBMP shall specify a procedure to be implemented following accidental disturbance of nests or project-related premature fledging, including wildlife rehabilitation options. It also shall describe any proposed measures, and applicable circumstances, to prevent take of precocial young of ground-nesting birds such as killdeer or quail. For example, chick fences may be used to prevent them from entering work areas and access roads. Finally, the NBMP will specify a procedure for removal of inactive nests, including verification that the nest is inactive and notification and approval process prior to removal. **Monitoring.** SCE shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures (above). The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to project work areas, bird nesting activity, project-related disturbance, and outcome of each nest. SCE shall monitor each nest until nestlings have fledged and dispersed or until the nest becomes inactive. In addition, monitoring shall include pre-construction surveys, daily sweeps of work areas and equip-ment, and any special monitoring requirements for particular activities (tree trimming, vege-tation removal, etc.) or particular species (noise monitoring, etc.). Nest monitoring shall con-tinue throughout the breeding season during each year of the project's construction activities. **Reporting.** Throughout the construction phase of the project, nest locations, project activi-ties in the vicinity of nests (including helicopter traces), and any adjustments to buffer areas shall be updated and available to CPUC monitors on a daily basis. All buffer reduction notifi-cations and prompt notifications of nest-related non-compliance and corrective actions will be made via email to CPUC monitors. The draft NBMP shall include a proposed format for daily reporting (e.g., spreadsheet available online, tracking each nest). In addition, the NBMP shall specify the format and content of nest data to be provided in regular monitoring and compliance reports. At the end of each year's nest season, SCE will submit an annual NBMP report to the CPUC, BLM, CDFW, and USFWS. The annual report shall describe all preconstruction survey work, monitoring data (including names of monitors, activities and sites visited throughout the season), all reductions from standard buffer distances, buffer incursions and nest disturbance, project-related take of nesting birds, injury or entrapment of birds or other animals due to nest deterrents, and nest outcomes for all nests docu-mented throughout the year.	~~USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format.~~ **Nest deterrents.** The NBMP shall describe any proposed measures or deterrents to prevent or reduce bird nesting activity on project equipment or facilities, such as buoys, visual or auditory hazing devices, bird repellents, securing of materials, and netting of materials, vehi-cles, and equipment. ~~It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance and training for the contractor to properly install, maintain, and use nest deterrents; and daily monitoring of nest deterrents to ensure proper installation and functioning and prevent injury or entrapment of birds or other animals. In the event that an active nest is located on project facilities, materials or equipment, SCE will either (1) avoid disturbance or use of the facilities, mate-rials or equipment (e.g., by red-tag) until the nest is no longer active, or (2) coordinate with the CPUC, BLM, CDFW, and USFWS to obtain authorization to remove the nest. The NBMP shall describe the proposed procedure for removal of nests, including wildlife rehabilitation options.~~ **Communication.** The NBMP shall specify the responsibilities of construction monitors in regards to nests and nest issues, and specify a direct communication protocol to ensure that nest information and potential adverse impacts to nesting birds can be promptly communi-cated from nest monitors to construction monitors, so that any needed actions can be taken immediately. ~~The NBMP shall specify a procedure to be implemented following accidental disturbance of nests or project-related premature fledging, including wildlife rehabilitation options. It also shall describe any proposed measures, and applicable circumstances, to prevent take of precocial young of ground-nesting birds such as killdeer or quail. For example, chick fences may be used to prevent them from entering work areas and access roads. Finally, the NBMP will specify a procedure for removal of inactive nests, including verification that the nest is inactive and notification and approval process prior to removal.~~ **Monitoring.** SCE shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures (above). The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to project work areas, bird nesting activity, project-related disturbance, and nest outcomes. ~~of each nest. SCE shall monitor each nest until nestlings have fledged and dispersed or until the nest becomes inactive. In addition, monitoring shall include pre-construction surveys, daily sweeps of work areas and equip-ment, and any special monitoring requirements for particular activities (tree trimming, vege-tation removal, etc.) or particular species (noise monitoring, etc.). Nest monitoring shall con-tinue throughout the breeding season during each year of the project's construction activities.~~ **Reporting.** Throughout the construction phase of the project, nest locations, project activi-ties in the vicinity of nests (including helicopter traces), and any adjustments to buffer areas shall be updated and available to CPUC monitors on a daily basis. All buffer reduction notifi-cations and prompt notifications of nest-related non-compliance and corrective actions will be made via email to CPUC monitors. ~~The draft NBMP shall include a proposed format for daily reporting (e.g., spreadsheet available online, tracking each nest). In addition, the NBMP shall specify the format and content of nest data to be provided in regular monitoring and compliance reports. At the end of each year's nest season, SCE will submit an annual NBMP report to the CPUC, BLM, CDFW, and USFWS. The annual report shall describe all preconstruction survey work, monitoring data (including names of monitors, activities and sites visited throughout the season), all reductions from standard buffer distances, buffer incursions and nest disturbance, project-related take of nesting birds, injury or entrapment of birds or other animals due to nest deterrents, and nest outcomes for all nests docu-mented throughout the year.~~ **Implementation locations:** San Bernardino County (all); WR-MSHCP (all, regardless of SCE's PSE status); CV-MSHCP (all, regardless of SCE's PSE status); BLM (all); reservation (recom-mended for all Morongo Tribal Lands).

	Implementation locations: San Bernardino County (all); WR-MSHCP (all, regardless of SCE's PSE status); CV-MSHCP (all, regardless of SCE's PSE status); BLM (all); reservation (recom-mended for all Morongo Tribal Lands).	
D.5-51	**WIL-2b Prepare and implement Raven Monitoring, Management, and Control Plan.** SCE shall pre-pare and implement a Raven Monitoring, Management, and Control Plan (Raven Plan) con-sistent with USFWS raven management guidelines and that meets the approval of the CPUC and BLM in consultation with USFWS, and CDFW. The purpose of the Raven Plan shall be to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, restoration, and O&M phases. The Plan shall address all project components and their potential effects on raven numbers and activity. The threshold for implementation of raven control measures shall be any increases in raven numbers from baseline conditions, as detected by monitoring to be imple-mented pursuant to the Plan. Regardless of raven monitoring results, SCE shall be respon-sible for all other aspects of raven management described in the Raven Plan, such as avoid-ance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. In addition, to offset the cumulative contribu-tions of the project to desert tortoise impacts from increased raven numbers, SCE shall con-tribute to the USFWS Regional Raven Management Program. SCE shall: **1. Prepare and Implement a Raven Management Plan** that shall include, but shall not be limited to the following components. The Plan shall be reviewed and approved by CPUC, BLM, USFWS, and CDFW prior to the start of construction activities. a. Identify all potential project activities, structures, components, and other effects that could provide predator subsidies or attractants, including potential sources of food and water, and nesting materials, as well as nest or perch sites. These will include, but will not be limited to: waste food material, road-killed animals, water storage, potential pooling from leaks, dust control, or wastewater, debris from brush clear-ing, and perch or roost sites on project facilities and infrastructure. b. Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities. c. Appoint a qualified biologist who will implement a monitoring schedule and field methods for the purpose of locating any ravens present the project vicinity and detecting any increase in raven numbers or activity. d. Specify raven activity thresholds for implementation of control measures. e. Describe control practices for ravens to be implemented as needed based on the monitoring results. f. Address monitoring and nest removal during construction and for the life of the project. g. Describe reporting schedules and requirements. **2. Contribute to the USFWS Regional Raven Management Program.** No later than 30 days prior to the start of construction, SCE shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of $105 per acre of long-term or permanent project disturbance to the national Fish and Wildlife Federation Renewable Energy Action Team raven control account. **Implementation locations:** This mitigation measure applies on BLM lands and is recom-mended on all Morongo Tribal Lands. No suitable desert tortoise habitat is present within San Bernardino County	The raven nesting opportunities currently present on the WOD corridor would be reduced by the Proposed Project. Implementation of this plan during construction and post-construction restoration along with the payment into the USFWS Regional Raven Management Program will more than adequately reduce the potential impact to less than significant, without requiring that this plan apply to O&M activities. Additionally, this measure should only apply to acreage impacts in suitable desert tortoise habitat. If SCE decides to become a PSE in CV-MSHCP, take of desert tortoise will be obtained and fees for impacts will have already been paid. This measure should not apply to the portion of the project in the CV-MSHCP. The preparation and implementation of a Raven Management Plan is typically required as a conservation or mitigation measure to minimize impacts to desert tortoise in a USFWS Biological Opinion or CDFW Incidental Take Statement, due to raven predation. Due to the limited distribution of desert tortoise individuals and habitat along the West of Devers Corridor and the existing nesting opportunities available (i.e. existing towers, billboards, trees, etc.), the existing conditions should be taken into consideration when developing the plan. For the reasons discussed above, please make the following revisions: **WIL-2b Prepare and implement Raven Monitoring, Management, and Control Plan.** SCE shall pre-pare and implement a Raven Monitoring, Management, and Control Plan (Raven Plan) con-sistent with USFWS raven management guidelines and that meets the approval of the CPUC and BLM in consultation with USFWS, and CDFW. The purpose of the Raven Plan shall be to minimize project-related predator subsidies and prevent any increases in raven numbers or activity within desert tortoise habitat during construction, and restoration~~, and O&M~~ phases. The Plan shall address all project components and their potential effects on raven numbers and activity. The threshold for implementation of raven control measures shall be any increases in raven numbers from baseline conditions, as detected by monitoring to be imple-mented pursuant to the Plan. Regardless of raven monitoring results, SCE shall be respon-sible for all other aspects of raven management described in the Raven Plan, such as avoid-ance and minimization of project-related trash, water sources, or perch/roost/nest sites that could contribute to increased raven numbers. In addition, to offset the cumulative contribu-tions of the project to desert tortoise impacts from increased raven numbers, SCE shall con-tribute to the USFWS Regional Raven Management Program. SCE shall: **1. Prepare and Implement a Raven Management Plan** that may ~~shall~~ include, but ~~shall~~ may not be limited to the following components. The plan will outline clear objectives and take into consideration the existing raven nesting opportunities and low distribution of desert tortoise within and adjacent to the ROW. The Plan shall be reviewed and approved by CPUC, BLM, USFWS, and CDFW prior to the start of construction activities. a. Identify all potential project activities, structures, components, and other effects that could provide predator subsidies or attractants, including potential sources of food and water, and nesting materials, as well as nest or perch sites. These will include, but will not be limited to: waste food material, road-killed animals, water storage, potential pooling from leaks, dust control, or wastewater, debris from brush clear-ing, and perch or roost sites on project facilities and infrastructure. b. Describe management practices to avoid or minimize conditions that might increase raven numbers and predatory activities. c. Appoint a qualified biologist who will implement a monitoring schedule and field methods for the purpose of locating any ravens present the project vicinity and detecting any increase in raven numbers or activity.

	and the WR-MSHCP; therefore, this mitigation measure does not apply in these jurisdictions. In the CV-MSHCP, this mitigation measure shall apply in its entirety regardless of SCE's PSE status.	d. Specify raven activity thresholds for implementation of control measures. e. Describe control practices for ravens to be implemented as needed based on the monitoring results. f. Address monitoring and nest removal during construction and for the life of the project. g. Describe reporting schedules and requirements. **2. Contribute to the USFWS Regional Raven Management Program.** No later than 30 days prior to the start of construction, SCE shall contribute to the USFWS Regional Raven Management Program by making a one-time payment of $105 per acre of long-term or permanent project disturbance to the national Fish and Wildlife Federation Renewable Energy Action Team raven control account. **Implementation locations:** This mitigation measure applies to impacts to suitable habitat on BLM lands and is recommended for all impacts to suitable habitat on all Morongo Tribal Lands. No suitable desert tortoise habitat is present within San Bernardino County and the WR-MSHCP; therefore, this mitigation measure does not apply in these jurisdictions. ~~In the CV-MSHCP,~~ This mitigation measure shall apply in its entirety to the CV-MSHCP area if SCE chooses not to become a ~~regardless of SCE's~~ PSE.
D.5-52	**WIL-2c Conduct surveys and avoidance for threatened or endangered riparian birds.** Construction activities shall avoid suitable habitat for listed riparian birds. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS and obtain appropriate take authoriza-tions or permits. SCE shall implement the conservation measures contained within these permits. If construction activities will occur during the breeding season potentially suitable habitat for listed riparian birds, a qualified biologist shall conduct protocol surveys of the project area and adjacent areas within 500 feet. USFWS protocol surveys shall be conducted for southwestern willow flycatcher, yellow-billed cuckoo, and least Bell's vireo. The surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur dur-ing the breeding season. Where protocol surveys determine that listed riparian birds are present, SCE shall conduct additional focused nest location surveys, to determine the loca-tions of nests and territories. Survey areas shall include a 500-foot buffer around project dis-turbance areas. Protocol surveys, shall be conducted within one year prior to the start of construction and shall continue annually during each nesting season until completion of construction and res-toration activities. At a minimum, surveys shall be conducted from 15 May to 17 July for southwestern willow flycatcher, from 10 April to 31 July for least Bell's vireo, and from 1 June to 31 August for yellow-billed cuckoo. These surveys may be modified through coordination with the USFWS, CDFW, BLM, and the CPUC based on the condition of habitat, the observation of the species, or avoidance of riparian areas during the breeding season. SCE shall submit documentation providing results of the protocol surveys for listed riparian birds to the CPUC and BLM for review and approval in consultation with USFWS and CDFW. If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review in consultation with USFWS and CDFW. In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers.	If SCE obtains PSE Status, yearly protocol surveys may not be required, in addition conditions of the Certificate of Inclusion or the Biological opinion should apply to the project and supersede requirements outlined in this measure intended to protect the species. **WIL-2c Conduct surveys and avoidance for threatened or endangered riparian birds.** Construction activities shall avoid suitable habitat for listed riparian birds. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS and obtain appropriate take authoriza-tions or permits. SCE shall implement the conservation measures contained within these permits. If construction activities will occur during the breeding season potentially suitable habitat for listed riparian birds, a qualified biologist shall conduct protocol surveys of the project area and adjacent areas within 500 feet. USFWS protocol surveys shall be conducted for southwestern willow flycatcher, yellow-billed cuckoo, and least Bell's vireo. The surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur dur-ing the breeding season. Where protocol surveys determine that listed riparian birds are present, SCE shall conduct additional focused nest location surveys, to determine the loca-tions of nests and territories. Survey areas shall include a 500-foot buffer around project dis-turbance areas. Protocol surveys, shall be conducted within one year prior to the start of construction and shall continue annually during each nesting season until occupied habitat is established, or as otherwise required by USFWS or through WR-MSHCP participation.. ~~completion of construction and res-toration activities. At a minimum, surveys shall be conducted from 15 May to 17 July for southwestern willow flycatcher, from 10 April to 31 July for least Bell's vireo, and from 1 June to 31 August for yellow-billed cuckoo.~~ These surveys may be modified through coordination with the USFWS, CDFW, BLM, and the CPUC based on the condition of habitat, the observation of the species, or avoidance of riparian areas during the breeding season. SCE shall submit documentation providing results of the protocol surveys for listed riparian birds to the CPUC and BLM for review and approval in consultation with USFWS and CDFW. If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis or as otherwise required by USFWS, CDFW, or through WR-MSHCP

	If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while listed riparian birds occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring. If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting birds, additional noise reduction tech-niques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to: □ Temporary noise barriers or sound walls □ Noise pads or dampers □ Replace and update noisy equipment □ Moveable task noise barriers □ Queue trucks to distribute idling noise □ Locate vehicle access points and loading and shipping facilities away from the nest site □ Reduce the number of noisy activities that occur simultaneously □ Relocate noisy stationary equipment away from the nest sites **Implementation locations:** This mitigation measure applies on BLM lands, throughout the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and within San Bernardino County, and is recommended on all Morongo Tribal Lands.	participation, until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review in consultation with USFWS and CDFW. In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and ~~1,000~~ 500-foot vertical helicopter disturbance-free buffer shall be established around the active nest and demarcated by fencing or flagging. These buffers may be adjusted in consultation with USFWS and CDFW based on the type of work activity performed. No construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads. If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting in the opinion of the qualified nesting bird monitor, construction within 500 feet will discontinue. If construction is to continue, prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while listed riparian birds occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring. If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting birds, additional noise reduction tech-niques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to: • Temporary noise barriers or sound walls • Noise pads or dampers • Replace and update noisy equipment • Moveable task noise barriers • Queue trucks to distribute idling noise • Locate vehicle access points and loading and shipping facilities away from the nest site • Reduce the number of noisy activities that occur simultaneously • Relocate noisy stationary equipment away from the nest sites **Implementation locations:** ~~This mitigation measure applies on BLM lands, throughout the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and within San Bernardino County, and is recommended on all Morongo Tribal Lands.~~ This mitigation measure applies to all locations within San Ber-nardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's impacts to threatened or endangered riparian birds will be mitigated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.
D.5-53	**WIL-2e Conduct surveys and avoidance for coastal California gnatcatcher.** SCE shall conduct proto-col level surveys for coastal California gnatcatchers (CAGN) in all areas of coastal sage scrub habitat that may be affected by the project. Survey areas will include a 500-foot buffer around project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied CAGN habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.	Participation in the WR-MSHCP as a PSE may result in different mitigation measure requirements. Language added to allow consistency with WR-MSHCP requirements if SCE becomes a PSE: **WIL-2e Conduct surveys and avoidance for coastal California gnatcatcher.** SCE shall conduct proto-col level surveys for coastal California gnatcatchers (CAGN) in all areas of coastal sage scrub habitat that may be affected by the project, unless otherwise required as a PSE under the WR-MSHCP or CV-MSHCP. Survey areas will include a 500-foot buffer around project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied

	Surveys shall be conducted by qualified and permitted biologists. Surveys shall be of ade-quate duration to verify potential nest sites if work is scheduled to occur during the breed-ing season. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for CAGN to the CPUC and BLM for review and approval in consultation with USFWS and CDFW. Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities. If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately and the observation will be included in the daily monitoring report. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review on a weekly basis. In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers. If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while CAGN occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construc-tion and demolition, using the same methodology that will be used to take noise mea-surements during monitoring. If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting CAGN, additional noise reduction tech-niques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to: □□Temporary noise barriers or sound walls □□Noise pads or dampers □□Replace and update noisy equipment □□Moveable task noise barriers □□Queue trucks to distribute idling noise □□Locate vehicle access points and loading and shipping facilities away from the nest site □□Reduce the number of noisy activities that occur simultaneously □□Relocate noisy stationary equipment away from the nest sites Construction activities shall avoid suitable habitat for CAGN, to the extent feasible. If suit-able habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain appropri-ate take authorization or permits. SCE shall implement the conservation measures con-tained within these permits. **Implementation locations:** This mitigation measure shall apply within San Bernardino County, throughout the WR-MSHCP lands (regardless of SCE's PSE status), and is recom-mended within Morongo Tribal Lands. No suitable CAGN habitat is present in the CV-MSHCP portions of the ROW or on BLM land, so this mitigation measure shall not apply within those areas.	CAGN habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas. Surveys shall be conducted by qualified and permitted biologists. Surveys shall be of ade-quate duration to verify potential nest sites if work is scheduled to occur during the breed-ing season. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for CAGN to the CPUC and BLM for review and approval in consultation with USFWS and CDFW. Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities, or as otherwise required by USFWS or through WR-MSHCP participation. If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately and the observation will be included in the daily monitoring report. All active nests shall be monitored on a weekly basis or as otherwise required by USFWS or through WR-MSHCP participation until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review on a weekly basis. In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and ~~1,000~~ 500-foot vertical helicopter disturbance-free buffer shall be established around the active nest and demarcated by fencing or flagging. These buffers may be adjusted in consultation with USFWS and CDFW based on type of work activity performed. No construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads. If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting in the opinion of the authorized nesting bird monitor, construction within 500 feet will discontinue. If construction is to continue, shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while CAGN occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construc-tion and demolition, using the same methodology that will be used to take noise mea-surements during monitoring. If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting CAGN, additional noise reduction tech-niques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to: □□Temporary noise barriers or sound walls □□Noise pads or dampers □□Replace and update noisy equipment □□Moveable task noise barriers □□Queue trucks to distribute idling noise □□Locate vehicle access points and loading and shipping facilities away from the nest site □□Reduce the number of noisy activities that occur simultaneously □□Relocate noisy stationary equipment away from the nest sites Construction activities shall avoid ~~suitable~~occupied habitat for CAGN, to the extent feasible. If ~~suitable~~occupied habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain appropri-ate take authorization, ~~or~~ permits, and/or PSE Status. SCE shall implement the conservation measures con-tained within these permits.

		Implementation locations: This mitigation measure shall apply within San Bernardino County, throughout the WR-MSHCP lands (regardless of SCE's PSE status), and is recom-mended within Morongo Tribal Lands. No suitable CAGN habitat is present in the CV-MSHCP portions of the ROW or on BLM land, so this mitigation measure shall not apply within those areas. This mitigation measure applies to all locations within San Ber-nardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's impacts to CAGN will be mitigated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.
D.5-55	**WIL-2f Conduct surveys and avoidance for golden eagle.** SCE shall implement the following mea-sures to document golden eagle occurrence in the project area and surrounding mountains. Survey schedule and requirements will be as identified below unless otherwise authorized by the CPUC and BLM in consultation with the USFWS and CDFW. □□**Annual Winter and Nesting Season Surveys.** Beginning at least one year prior to the start of construction, and continuing throughout the construction phase of the project, SCE shall contract with a qualified and permitted biologist to conduct winter season and nesting season surveys of golden eagle habitat use within a 10-mile radius of the project area. Nesting season surveys will determine occupancy, productivity, and chronology of known or newly discovered nesting territories within the 10-mile radius. Survey methods for the inventory shall be either ground-based or helicopter-based, as described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. Winter surveys will evaluate golden eagle occurrence and habitat use within the 10-mile radius during winter. □□**Winter Season Survey Data.** Data collected during winter season surveys shall include dates, times, locations, observation minutes, nest status, and weather conditions during field surveys; panoramic photographs from the survey locations, indicating areas viewed; and compilations of all golden eagle and other raptor observations for each survey date. □□**Nesting Season Inventory Data.** At a minimum, data collected during the nesting season surveys shall include the following: territory status (unknown, vacant, occupied, breeding successful, breeding unsuccessful); nest location, nest elevation; age class of golden eagles observed; nesting chronology; number of young at each visit; photographs; and substrate upon which nest is placed. □□**Determination of Unoccupied Territory Status.** A nesting territory or inventoried habitat shall be considered unoccupied by golden eagles only after completing at least two full surveys in a single breeding season. □□**Monitoring and Adaptive Management Plan.** If an occupied nest (as defined by Pagel et al., 2010) is detected within 10 miles of the project, SCE shall prepare and implement a Golden Eagle Monitoring and Management Plan for the duration of construction to ensure that project construction activities do not result in injury or disturbance to golden eagles. The monitoring shall implement the guidelines described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. The Monitoring and Management Plan shall be implemented upon its approval by CPUC and BLM, in consultation with USFWS and CDFW. Triggers for adaptive management shall include any evidence of project-related disturbance to nesting golden eagles,	This measure has been written for a wind energy project rather than a transmission line project. The following edits to the plan have been made for the following reasons: • Winter surveys are not required for transmission lines and should be removed from the mitigation measure. (Please consult with Ms. Heather Beeler at USFWS regarding this measure.) • Transmission line projects are required to perform a 2 mile buffer survey on projects, as recommended by USFWS. • There is no required permit to performing golden eagle surveys, just a biologist that meets the qualifications of USFWS to perform golden eagle surveys. • A monitoring and adaptive management plan is not necessary for this project as SCE will implement a 1 mile line of sight, 1/2 mile no line of sight buffer for all active eagle nests as recommended by USFWS. Please see below for suggested revisions: **WIL-2f Conduct surveys and avoidance for golden eagle.** SCE shall implement the following measures to avoid impacts to ~~document~~ golden eagle<u>s</u> ~~occurrence~~ in the project area and surrounding mountains. Survey schedule and requirements will be as identified below unless otherwise authorized by the CPUC and BLM in consultation with the USFWS and CDFW. □□**Annual ~~Winter and~~ Nesting Season Surveys.** Beginning at least one year prior to the start of construction, and continuing throughout the construction phase of the project, SCE shall contract with a qualified ~~and permitted~~ biologist to conduct ~~winter season and~~ nesting season surveys of golden eagle habitat use within a <u>2</u>~~10~~-mile radius of the project area. Nesting season surveys will determine occupancy, productivity, and chronology of known or newly discovered nesting territories within the <u>2</u> ~~10~~-mile radius. Survey methods for the inventory shall be either ground-based or helicopter-based, as described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. ~~Winter surveys will evaluate golden eagle occurrence and habitat use within the 10-mile radius during winter.~~ ~~□□**Winter Season Survey Data.** Data collected during winter season surveys shall include dates, times, locations, observation minutes, nest status, and weather conditions during field surveys; panoramic photographs from the survey locations, indicating areas viewed; and compilations of all golden eagle and other raptor observations for each survey date.~~ □□**Nesting Season Inventory Data.** At a minimum, data collected during the nesting season surveys shall include the following: territory status (unknown, vacant, occupied, breeding successful, breeding unsuccessful); nest location, nest

	including but not limited to: agitation behavior (displacement, avoidance, and defense); increased vigilance behavior at nest sites; changes in foraging and feeding behavior, or nest site aban-donment. The Monitoring and Management Plan shall include a description of adaptive management actions, to include, but not be limited to, cessation of construction activities that are deemed by a qualified biologist to be the source of golden eagle disturbance. □□**Reporting.** Golden eagle survey data and, if applicable, nest activity monitoring results and any adaptive management actions taken, will be provided to CPUC, BLM, CDFW, and USFWS in monthly monitoring reports, as seasonal data becomes available and if specific nest monitoring or any adaptive management actions are taken, and summarized in annual project monitoring reports.	elevation; age class of golden eagles observed; nesting chronology; number of young at each visit; photographs; and substrate upon which nest is placed. □□**Determination of Unoccupied Territory Status.** A nesting territory or inventoried habitat shall be considered unoccupied by golden eagles only after completing at least two full surveys in a single breeding season. □□**Monitoring and Avoidance ~~Adaptive Management Plan.~~** If an occupied nest (as defined by Pagel et al., 2010) is detected within 2 miles of the project, SCE shall implement a 1 mile line of sight avoidance buffer, or 1/2 mile non line of sight avoidance buffer for all active eagle nests, as recommended by USFWS. The nest will be monitored weekly when active construction activities occur within 2 miles of the nest. The buffer will be implemented around the occupied nest until a qualified biologist determines the nest is no longer occupied. This buffer may be modified in consultation with CPUC, BLM and USFWS. □□~~**Monitoring and Adaptive Management Plan.** If an occupied nest (as defined by Pagel et al., 2010) is detected within 10 miles of the project, SCE shall prepare and implement a Golden Eagle Monitoring and Management Plan for the duration of construction to ensure that project construction activities do not result in injury or disturbance to golden eagles. The monitoring shall implement the guidelines described in the Golden Eagle Technical Guidance (Pagel et al., 2010) or more current guidance from the USFWS. The Monitoring and Management Plan shall be implemented upon its approval by CPUC and BLM, in consultation with USFWS and CDFW. Triggers for adaptive management shall include any evidence of project-related disturbance to nesting golden eagles, including but not limited to: agitation behavior (displacement, avoidance, and defense); increased vigilance behavior at nest sites; changes in foraging and feeding behavior, or nest site aban-donment. The Monitoring and Management Plan shall include a description of adaptive management actions, to include, but not be limited to, cessation of construction activities that are deemed by a qualified biologist to be the source of golden eagle disturbance.~~ □□**Reporting.** Golden eagle survey data and, if applicable, nest activity monitoring results and any adaptive management actions taken, will be provided to CPUC, BLM, CDFW, and USFWS in monthly monitoring reports, as seasonal data becomes available and if specific nest monitoring or any adaptive management actions are taken, and summarized in annual project monitoring reports.
D.5-56	**WIL-2g: Conduct surveys and avoidance for burrowing owl** **Paragraph 2** "If active burrowing owl burrows are located within project work areas, SCE may passively relocate the owls, outside the nesting season only, by preparing and implementing a Burrowing Owl Passive Relocation Plan, as described below." An occupied burrow may not be disturbed during the nesting season (generally, but not limited to, February 1 to August 31), unless a qualified biologist determines, by non-invasive methods, that it is not occupied by a mated pair.	Clarification to burrowing owl relocation methods below. **Suggested Revision:** If active burrowing owl burrows are located within project work areas, SCE may passively relocate the owls, outside the nesting season only, by preparing and implementing a Burrowing Owl Passive Relocation Plan, as described below. The active burrowing owl burrow may be relocated during nesting season if a qualified biologist determines, by non-invasive methods, that it is not occupied by a mated pair.
D.5-57	**Wil-2i. Conduct surveys and avoidance for bats.** **Non-special status bats.** Any active bat roosts will be identified and clearly marked. An exclusion area will be estab-lished 165 feet from any active roost, and these areas will be avoided during construction	In order to clarify the description of "active bat roost," please make the following revisions: **Wil-2i. Conduct surveys and avoidance for bats.** **Non-special status bats.** Any active bat maternity roosts and occupied hibernaculum will be identified and clearly marked. An exclusion area will be estab-lished 165 feet from any active roost, and these areas will be avoided during construction

	Conduct surveys and avoidance for bats **Special status bats.** If special-status bat species occur at these roosting/nursery sites, then construction activities shall avoid these sites and a surrounding buffer distance of 300 feet.	**Conduct surveys and avoidance for bats.** **Special status bats.** If special-status bat species maternity roosts or occupied hibernaculum occur ~~at these roosting/nursery sites~~, then construction activities shall avoid these sites and a surrounding buffer distance of 300 feet.
D.5-57	**WIL-2h Conduct surveys and avoidance for special-status terrestrial herpetofauna**. Biological mon-itors shall conduct clearance surveys for terrestrial herpetofauna prior to construction each day, monitor construction activities for compliance, and submit monitoring reports to the CPUC and BLM for review on a weekly basis. Following the clearance surveys, either (1) exclusion fencing will be erected or (2) a biological monitor will be on the site during construction activities, to prevent take of special-status herpetofauna. If the installation of exclusion fencing is deemed necessary, the biological monitor shall direct the installation of the fence. If any terrestrial herpetofauna are found on the construction site, the animal will be allowed to move away from the construction site on its own, or a qualified biologist will relocate it nearby suitable habitat outside the construction area and place it in the shade of a shrub. If potentially suitable burrows or rock piles are found, they will be checked for occupancy. Occupied burrows will be flagged and avoided (employing a 50-foot buffer) during construction. If the burrow cannot be avoided, it will be excavated and the occupant relocated to an unoccupied burrow outside the construction area and of approximately the same size as the one from which it was removed. If an existing burrow is unavailable, the biologist will con-struct or direct the construction of a burrow of similar shape, size, depth, and orientation as the original.	This measure should only apply in areas with suitable habitat for special-status terrestrial herpetofauna. The following revisions are suggested: **WIL-2h Conduct surveys and avoidance for special-status terrestrial herpetofauna**. Biological mon-itors shall conduct clearance surveys in areas with suitable habitat for special-status terrestrial herpetofauna prior to construction each day, monitor construction activities for compliance, and submit monitoring reports to the CPUC and BLM for review on a weekly basis. Following the clearance surveys, either (1) exclusion fencing will be erected or (2) a biological monitor will be on the site during construction activities, to prevent take of special-status herpetofauna. If the installation of exclusion fencing is deemed necessary, the biological monitor shall direct the installation of the fence. If any terrestrial herpetofauna are found on the construction site, the animal will be allowed to move away from the construction site on its own, or a qualified biologist will relocate it nearby suitable habitat outside the construction area and place it in the shade of a shrub. If potentially suitable burrows or rock piles are found, they will be checked for occupancy. Occupied burrows will be flagged and avoided (employing a 50-foot buffer) during construction. If the burrow cannot be avoided, it will be excavated and the occupant relocated to an unoccupied burrow outside the construction area and of approximately the same size as the one from which it was removed. If an existing burrow is unavailable, the biologist will con-struct or direct the construction of a burrow of similar shape, size, depth, and orientation as the original.
D.5-59	**WIL-2j Conduct surveys and avoidance for special-status small mammals.** SCE shall implement pre-construction surveys for special-status small mammals including San Diego black-tailed jackrabbit, northwestern San Diego pocket, pallid San Diego pocket mouse, Palm Springs pocket mouse, Los Angeles pocket mouse, Palm Springs round-tailed ground squirrel, and San Diego desert woodrat in suitable habitats. SCE shall submit documentation providing pre-construction survey results to the CPUC and BLM for review and approval in consulta-tion with CDFW and USFWS. Prior to initiating construction-related activities, SCE shall pre-pare and implement construction minimization measures and habitat conservation mea-sures for review and approval by CPUC and BLM in consultation with USFWS and CDFW to minimize habitat loss and potential take. Active woodrat nests that may be occupied by *Neotoma lepida* shall be flagged and ground-disturbing activities shall be avoided within a minimum of 10 feet surrounding each active nest unless otherwise authorized by the CDFW and CPUC. If avoidance is not possible, SCE shall take the following sequential steps: (1) all understory vegetation will be cleared in the area immediately surrounding active nests followed by a period of one night without further disturbance to allow woodrats to vacate the nest, (2) each occupied nest will then be dis-turbed by a qualified wildlife biologist until all woodrats leave the nest and seek refuge off-site, and (3) the nest sticks shall be removed from the project site and piled at the base of a nearby shrub or tree. Relocated nests shall not be spaced closer than 100 feet apart, unless a qualified wildlife biologist has determined that a specific habitat can support a higher density of nests. SCE shall document all woodrat nests moved in weekly monitoring	To clarify the instance of the San Diego desert Woodrat, please make the following revision: **WIL-2j Conduct surveys and avoidance for special-status small mammals.** SCE shall implement pre-construction surveys for special-status small mammals including San Diego black-tailed jackrabbit, northwestern San Diego pocket, pallid San Diego pocket mouse, Palm Springs pocket mouse, Los Angeles pocket mouse, Palm Springs round-tailed ground squirrel, and San Diego desert woodrat in suitable habitats. SCE shall submit documentation providing pre-construction survey results to the CPUC and BLM for review and approval in consulta-tion with CDFW and USFWS. Prior to initiating construction-related activities, SCE shall pre-pare and implement construction minimization measures and habitat conservation mea-sures for review and approval by CPUC and BLM in consultation with USFWS and CDFW to minimize habitat loss and potential take. Active woodrat nests that may be occupied by San Diego desert woodrat *(Neotoma lepida intermedia)* shall be flagged and ground-disturbing activities shall be avoided within a minimum of 10 feet surrounding each active nest unless otherwise authorized by the CDFW and CPUC. If avoidance is not possible, SCE shall take the following sequential steps: (1) all understory vegetation will be cleared in the area immediately surrounding active nests followed by a period of one night without further disturbance to allow woodrats to vacate the nest, (2) each occupied nest will then be dis-turbed by a qualified wildlife biologist until all woodrats leave the nest and seek refuge off-site, and (3) the nest sticks shall be removed from the project site and piled at the base of a nearby shrub or tree. Relocated nests shall not be spaced closer than 100 feet apart, unless a qualified wildlife biologist has determined that a specific habitat can support a higher density of nests. SCE shall document all woodrat nests moved in weekly monitoring reports, and will include a written summary in each annual report to the CPUC, BLM, and CDFW. The resumes of the qualified biologists shall be provided to the CPUC and BLM (as appropriate) for

	reports, and will include a written summary in each annual report to the CPUC, BLM, and CDFW. The resumes of the qualified biologists shall be provided to the CPUC and BLM (as appropriate) for concurrence. **Implementation locations:** This mitigation measure shall apply within San Bernardino County, on BLM lands, within the WR-MSHCP and CV-MSHCP areas (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands.	concurrence. The San Diego desert woodrat is a covered species under the WR-MSHCP. If SCE becomes a PSE under the WR-MSHCP, woodrat nest avoidance would be implemented where practicable, however, this mitigation would not be required, as is consistent with the WR-MSHCP. **Implementation locations:** This mitigation measure shall apply within San Bernardino County, on BLM lands, within the WR-MSHCP (only if SCE does not obtain PSE status), and CV-MSHCP areas (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands
D.5-59	**WIL-2k. Conduct surveys and avoidance for American badger, ringtail, and desert kit fox.** Active dens shall be flagged and project activities within 200 feet (non-natal dens) or 500 feet (natal dens, or any active den during the breeding season) shall be avoided.	200 feet and 500 feet are excessive buffers. Recent projects have successfully implemented a 100ft buffer. SCE suggests the following revisions: **WIL-2k. Conduct surveys and avoidance for American badger, ringtail, and desert kit fox.** Active dens shall be flagged and project construction activities within ~~200 feet (non-natal dens) or 500~~ 100 feet (non-natal den, natal dens, or any active den during the breeding season) shall be avoided. Ingress/egress of construction equipment through buffers and low intensity activities such as BMP maintenance shall be exempt from the buffer restrictions.
D.5-60	**WIL-2k: Conduct surveys and avoidance for American badger, ringtail, and desert kit fox** **Paragraph 4** **Active and potentially active non-natal dens**. Outside the breeding season, any potentially active dens that would be directly impacted by construction activities shall be monitored by a qualified mammologist or biologist for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den may be excavated and backfilled by hand. If tracks are observed, the den may be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) for the next three to five nights to discourage continued use. After verification that the den is no longer active, the den may be excavated and back-filled by hand.	For additional clarification, please make the following revision:: **Active and potentially active non-natal dens**. Outside the breeding season, any potentially active dens that would be directly impacted by construction activities shall be monitored by a qualified mammologist or biologist for three consecutive nights using a tracking medium (such as diatomaceous earth or fire clay) or infrared camera stations at the entrance. If no tracks are observed in the tracking medium or no photos of the target species are captured after three nights, the den may be excavated and backfilled by hand. If tracks are observed, the den may be progressively blocked with natural materials (rocks, dirt, sticks, and vegetation piled in front of the entrance) or a one-way door installed over the den entrance for the next three to five nights to discourage continued use. After verification that the den is no longer active, the den may be excavated and back-filled by hand.
D5-83	**Table D.5-6. Mitigation Monitoring Program – Biological Resources, Wildlife** **Effectiveness Criteria** — Avoid take of desert tortoise. **Responsible Agency** — CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS. **Timing** — Within 14 days prior to construction, and during construction. **MITIGATION MEASURE** — **WIL-2b: Prepare and implement Raven Monitoring, Management, and Control Plan (full text in Section D.5.3.3)** **Location** — All areas with suitable desert tortoise habitat. **Monitoring / Reporting Action** — SCE submits a Raven Monitoring, Management, and Control Plan; CPUC/BLM monitor approves report format and contents in consultation with CDFW and USFWS. **Effectiveness Criteria** — Minimize project-related predator subsidies and prevent increases in raven numbers or activity within desert tortoise habitat.	The raven nesting opportunities currently present on the WOD corridor would be reduced by the Proposed Project. Implementation of this plan during construction and post-construction restoration along with the payment into the USFWS Regional Raven Management Program will more than adequately reduce the potential impact to less than significant without requiring this plan to apply to O&M activities. Please make the following revision: **Table D.5-6. Mitigation Monitoring Program – Biological Resources, Wildlife** **Effectiveness Criteria** — Avoid take of desert tortoise. **Responsible Agency** — CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS. **Timing** — Within 14 days prior to construction, and during construction. **MITIGATION MEASURE** — **WIL-2b: Prepare and implement Raven Monitoring, Management, and Control Plan (full text in Section D.5.3.3)** **Location** — All areas with suitable desert tortoise habitat.

<table>
<tr><td></td><td>Responsible Agency

Timing</td><td>CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Prior to the start of construction, and during construction, restoration, and O&M phases.</td><td>Monitoring / Reporting Action

Effectiveness Criteria

Responsible Agency

Timing</td><td>SCE submits a Raven Monitoring, Management, and Control Plan; CPUC/BLM monitor approves report format and contents in consultation with CDFW and USFWS.
Minimize project-related predator subsidies and prevent increases in raven numbers or activity within desert tortoise habitat.
CPUC; BLM Palm Springs–South Coast Field Office in coordination with CDFW and USFWS.
Prior to the start of construction, and during construction, <u>and</u> restoration<s>, and O&M</s> phases.</td></tr>
<tr><td colspan="5">CLIMATE CHANGE</td></tr>
<tr><td>D.6-9 through 10</td><td colspan="2">The non-recurring construction emissions applied over the anticipated 30-year service life of the Proposed Project results in an average rate of roughly 1,600 MTCO2e per year. This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011).</td><td colspan="2">The SCAQMD GHG threshold of 10,000 MTCO2e/yr is should be compared to construction GHG emissions amortized over 30 years and added to operational GHG emissions, in order to represent an annual amortization of total GHG emissions.

The DEIR currently compares only amortized construction emissions to the 10,000 MTCO2e/yr threshold, then also compares estimated operational emissions to the threshold separately.

SCE recommends adding amortized construction emissions to annual operational emissions, and comparing the total to the SCAQMD threshold (i.e. 1,600 + 49).</td></tr>
<tr><td>D.6-9</td><td colspan="2">This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011).</td><td colspan="2">SCE concurs that no mitigation is necessary to minimize GHG emissions. However, it may be beneficial to point out that Air Quality Mitigation Measures AQ-1b and AQ-1c would also reduce GHG emissions. The following language is suggested:

This level of amortized construction GHG emissions would be under the threshold level of 10,000 metric tons that applies to electric generating facilities for annual mandatory reporting of GHG (17 CCR 95101), and these emissions would also be below a threshold level of 10,000 metric tons that applies to annually recurring emissions (SCAQMD, 2011). <u>Furthermore, Air Quality Mitigation Measures AQ-1b, Control Off-Road Equipment Emissions and AQ-1c, Control Helicopter Emissions, which were intended to minimize criteria pollutant emissions, would also reduce GHG emissions during construction.</u></td></tr>
<tr><td>D.6-10</td><td colspan="2">Table D.6-4. Operation-Related GHG Emissions (MTCO2e/yr)

Table D.6-4. Operation-Related GHG Emissions (MTCO2e/yr)
Source | SF6 | Total CO2e
SF6 Losses from Circuit Breakers | 25 | 25
Maintenance Trucks | — | 1
Helicopters | — | 9
Pickup Trucks | — | 2
Boom/Crane Trucks | — | 12
Operations and Maintenance | 25 | 49</td><td colspan="2">Recommend revising "SF6" from the "Source" row of Table D.6-4 to read "SF6 as CO2e" for clarity.

Table D.6-4. Operation-Related GHG Emissions (MTCO2e/yr)
Source | SF6 <u>as CO2e</u> | Total CO2e
SF6 Losses from Circuit Breakers | 25 | 25
Maintenance Trucks | — | 1
Helicopters | — | 9
Pickup Trucks | — | 2
Boom/Crane Trucks | — | 12
Operations and Maintenance | 25 | 49</td></tr>
</table>

D.6-15 through D.6-17	**D.6.4.3 Phased Build Alternative** Impact GHG-1, GHG-2	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration for construction activities would result in additional emissions impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.
CULTURE RESOURCES		
D.7-1	First paragraph …, along with archaeological survey and evaluation reports prepared on SCE's behalf by LSA Associates, Inc. (LSA) and ASM Affiliates (ASM).	Please change for accuracy: along with archaeological survey and evaluation reports prepared on SCE's behalf by LSA Associates, Inc. (LSA) ~~and~~ ASM Affiliates (ASM), and SCE.
D.7-2	3rd Paragraph ASM 2014	Please correct this citation: ~~AMS 2014~~ DeCarlo and Winslow, 2015a
D.7-2	4th Paragraph surface observations and using intensive archival research	Please correct the methods and citations: surface observations, ~~using~~ intensive archival research and/or test excavations (DeCarlo and Winslow 2015a, 2015b, 2015c; LSA and Williams 2014; Williams and Belcourt 2015)
D.7-3	2nd Paragraph (McLean et al. 2013 and ASM, 2014)	Please correct the citations: (McLean et al., 2013 ~~and ASM, 2014)~~DeCarlo and Winslow, 2015a, 2015b, 2015c; LSA and Williams, 2014; Williams and Belcourt, 2015)
D.7-3	Throughout this section: Williams and Belcourt (2014)	In the DEIR/DEIS, the citation is used as the primary citation from pages 3-10. Because Williams and Belcourt are not the primary authors of the information provided, SCE recommends adding primary references as used in Williams and Belcourt. The next 41 comments add the primary references.
D.7-3	10,000 years of human cultural development and environmental adaptation. For the Colorado Desert region, resolution of chronological sequencing, the general rarity of cultural deposits dating to the archaic periods, the abundance of diversity of adaptive patterns and the chronology of occupation associated with Lake Cahuilla are issues that challenge modern researchers (Williams and Belcourt, 2014:7).	Please revise as follows: 10,000 years of human cultural development and environmental adaptation. (Crabtree 1981; Warren 1984; Schaefer 1994; Schaefer and Laylander 2007; Sutton et al. 2007). For the Colorado Desert region, resolution of chronological sequencing, the general rarity of cultural deposits dating to the archaic periods, the abundance of diversity of adaptive patterns and the chronology of occupation associated with Lake Cahuilla are issues that challenge modern researchers ~~(Williams and Belcourt, 2014:7).~~
D.7-3	However, an Early Pleisto-cene occupation of the California deserts has not been demonstrated, and current consensus recognizes Clovis as the earliest cultural complex represented (Williams and Belcourt, 2014:7).	Please revise as follows: However, an Early Pleisto-cene occupation of the California deserts has not been demonstrated, and current consensus recognizes Clovis as the earliest cultural complex represented ~~(Williams and Belcourt, 2014:7).~~(Moratto 1984).
D.7-3	Approximately 12,000–7000 before present (BP) during the Early Holocene, the area between San Ber-nardino and San Gorgonio Pass was occupied by Native American people.	Please revise as follows: Approximately 12,000–7000 before present (BP) during the Early Holocene, the area between San Ber-nardino and San Gorgonio Pass was occupied by Native American people (Moratto 1984:110–113).

D.7-3	The occurrence of extremely large and occasionally fluted bifaces associated with the use of the spear and atlatl marks sites from this time (Williams and Belcourt, 2014:7).	Please revise as follows: The occurrence of extremely large and occasionally fluted bifaces associated with the use of the spear and atlatl marks sites from this time ~~(Williams and Belcourt, 2014:7)~~ (Moratto 1984:81)~~.~~
D.7-3	In general, the WPLT toolkit commonly includes crescentics, large flake and core scrapers, choppers, scraper planes, hammerstones, different core types, drills, and gravers. A primary characteristic of WPLT sites is their location on the shores of pluvial lakes from northern central California to southern California. The Lake Mojave Complex is one of the best known expressions of the WPLT (Williams and Belcourt, 2014:7, 9).	Please revise as follows: In general, the WPLT toolkit commonly includes crescentics, large flake and core scrapers, choppers, scraper planes, hammerstones, different core types, drills, and gravers (Moratto 1984:93). A primary characteristic of WPLT sites is their location on the shores of pluvial lakes from northern central California to southern California (Moratto 1984:81, 103). The Lake Mojave Complex is one of the best known expressions of the WPLT ~~(Williams and Belcourt, 2014:7, 9).~~
D.7-4	com-parative unit for Early Man in the Mojave Desert.	Please revise as follows: com-parative unit for Early Man in the Mojave Desert (Warren and Crabtree 1986:184).
D.7-4	Flaked stone artifacts include large stemmed Lake Mojave and Silver Lake proj-ectile points, leaf-shaped bifaces, bifacial cores, crescentics, domed and keeled scrapers, shaft straight-eners, and large core-cobble tools (Williams and Belcourt, 2014:9).	Please revise as follows: Flaked stone artifacts include large stemmed Lake Mojave and Silver Lake proj-ectile points, leaf-shaped bifaces, bifacial cores, crescentics, domed and keeled scrapers, shaft straight-eners, and large core-cobble tools ~~(Williams and Belcourt, 2014:9)~~ (Hall 1993:19; Horne and McDougall 1997:9).
D.7-4	Pinto cultural com-plex has been demonstrated.	Please revise as follows: Pinto cultural com-plex has been demonstrated (Crabtree 1981:40; Sutton et al. 2007:238).
D.7-4	indicate an increased reliance on seed processing	Please revise as follows: indicate an increased reliance on seed processing (Hall 1993:21; Horne and McDougall 1997:9)
D.7-4	before 7000 years B.P., before the onset of severe Middle Holocene desiccation (Williams and Belcourt, 2014:9, 10).	Please revise as follows: before 7000 years B.P., before the onset of severe Middle Holocene desiccation ~~(Williams and Belcourt, 2014:9, 10).~~(Sutton et al. 2007)
D.7-4	Both lacustrine and terrestrial biotic economic resources were also identified (Williams and Belcourt, 2014: 10).	Please revise as follows: Both lacustrine and terrestrial biotic economic resources were also identified ~~(Williams and Belcourt, 2014: 10).~~ (McDonald 1992:131).
D.7-4	Milling equipment in the assemblage consists mostly of broken and fire-affected manos and metates that were often recycled as hammerstones, cooking stones, and as construction material in cache pits and hearths (Williams and Belcourt, 2014: 10).	Please revise as follows: Milling equipment in the assemblage consists mostly of broken and fire-affected manos and metates that were often recycled as hammerstones, cooking stones, and as construction material in cache pits and hearths ~~(Williams and Belcourt, 2014: 10).~~ (McDonald 1992:240).
D.7-4	northern margins of the Lake Cahuilla basin going back at least 3,000 years (Williams and Belcourt, 2014: 10, 11).	Please revise as follows: northern margins of the Lake Cahuilla basin going back at least 3,000 years ~~(Williams and Belcourt, 2014: 10, 11).~~ (Love and Dahdul 2002)

D.7-5	transition zone occupied by both the Cahuilla and Luiseño. During the ethnohistoric period, the Serrano were also present in the San Gorgonio Pass, and the Cahuilla were present in the San Jacinto Valley and San Timoteo Canyon (Williams and Belcourt, 2014: 11).	Please revise as follows: transition zone occupied by both the Cahuilla and Luiseño (Bean and Vane 1978). During the ethnohistoric period, the Serrano were also present in the San Gorgonio Pass, and the Cahuilla were present in the San Jacinto Valley and San Timoteo Canyon ~~(Williams and Belcourt, 2014: 11)~~.
D.7-5	The Cahuilla, Luiseño, and Serrano, are Takic-speaking people of the Uto-Aztecan linguistic stock. The Cahuilla and Luiseño are of the Cupan sub-group, while the Serrano (and Gabrielino) are of the Serrano-Gabrielino sub-group. Before the more recent Takic linguistic grouping, the Cahuilla, Luiseño, Gabrielino, and Serrano were included within the southern Californian branch of the Shoshonean family. Cahuilla, Serrano, and Luiseño settlement patterns and culture are further addressed in the following Ethno-graphic section (Williams and Belcourt, 2014: 11).	Please revise as follows: The Cahuilla, Luiseño, and Serrano, are Takic-speaking people of the Uto-Aztecan linguistic stock (Bean and Vane 1979, Miller 1984). The Cahuilla and Luiseño are of the Cupan sub-group, while the Serrano (and Gabrielino) are of the Serrano-Gabrielino sub-group (Miller 1984). Before the more recent Takic linguistic grouping, the Cahuilla, Luiseño, Gabrielino, and Serrano were included within the southern Californian branch of the Shoshonean family by Kroeber (1907, 1925). Cahuilla, Serrano, and Luiseño settlement patterns and culture are further addressed in the following Ethno-graphic section ~~(Williams and Belcourt, 2014: 11)~~.
D.7-5	Speakers of the Uto-Aztecan family were located in the Great Basin, southern California, and an area stretching from southern Arizona into northwest and central Mexico	Please revise as follows: Speakers of the Uto-Aztecan family were located in the Great Basin, southern California, and an area stretching from southern Arizona into northwest and central Mexico (Miller 1984).
D.7-5	Additionally, after A.D. 1600, the desiccation of Lake Cahuilla resulted in an intensification of land use in the San Gorgonio Pass, the San Jacinto Plain, and Perris Valley regions that was reflected into the ethnohistoric period (Williams and Belcourt, 2014: 11, 12).	Please revise as follows: Additionally, after A.D. 1600, the desiccation of Lake Cahuilla resulted in an intensification of land use in the San Gorgonio Pass, the San Jacinto Plain, and Perris Valley regions that was reflected into the ethnohistoric period ~~(Williams and Belcourt, 2014: 11, 12).~~ (Bean et al. 1991; Wilke 1974, 1978; Schaefer 1994).
D.7-5	a time characterized by warm and arid conditions referred to as the Medieval Warm Period (approximately A.D 800 to 1350) (Williams and Belcourt, 2014: 12).	Please revise as follows: a time characterized by warm and arid conditions referred to as the Medieval Warm Period (approximately A.D 800 to 1350) ~~(Williams and Belcourt, 2014: 12).~~ (Sutton et al. 2007).
D.7-5	According to some, the shoreline of Lake Cahuilla fluctuated, the habitats were unstable and unreliable, and lakeshore settlement patterns must have been seasonal. Others argue that Lake Cahuilla was stable and supported year-round, or nearly year-round, settlement bases (Williams and Belcourt, 2014: 12).	Please revise as follows: According to ~~some~~ Weide (1974), the shoreline of Lake Cahuilla fluctuated, the habitats were unstable and unreliable, and lakeshore settlement patterns must have been seasonal. ~~Others~~ Wilke (1978) argue that Lake Cahuilla was stable and supported year-round, or nearly year-round, settlement bases ~~(Williams and Belcourt, 2014: 12).~~
D.7-5 & 6	Based on the concept of Lake Cahuilla providing a stable habitat that supported year-round settlement, it was inferred that the sudden drying up of Lake Cahuilla resulted in the permanent shift of populations from the lakeshore to locations of low desert or upland resources, such as Coachella Valley or the Peninsular Range. However, it is unclear if the shift in lakeshore populations after the final recession of the lake reflects a more subtle, rather than a major, readjustment in settlement change. If the hypoth-esis of Lake Cahuilla being used more as a secondary, seasonal resource is taken into account, then the drying up of the lake would not have had such a dramatic effect on regional settlement patterns (Williams and Belcourt, 2014: 12).	Please revise as follows: Based on the concept of Lake Cahuilla providing a stable habitat that supported year-round settlement, Wilke (1978) inferred that the sudden drying up of Lake Cahuilla resulted in the permanent shift of populations from the lakeshore to locations of low desert or upland resources, such as Coachella Valley or the Peninsular Range. However, it is unclear if the shift in lakeshore populations after the final recession of the lake reflects a more subtle, rather than a major, readjustment in settlement change. If the hypoth-esis of Lake Cahuilla being used more as a secondary, seasonal resource is taken into account, then the drying up of the lake would not have had such a dramatic effect on regional settlement patterns Wilke (1978; Schaefer 1994). ~~(Williams and Belcourt, 2014: 12)~~.

D.7-6	The studies further hypothesized that settle-ments may have been clustered at more reliable water sources during this time, such as the coast, Lake Cahuilla, or Lake Elsinore (Williams and Belcourt, 2014: 13).	Please revise as follows: The studies further hypothesized that settle-ments may have been clustered at more reliable water sources during this time, such as the coast, Lake Cahuilla, or Lake Elsinore ~~(Williams and Belcourt, 2014: 13)~~ (Goldberg 2001).
D.7-6	On the other hand, the Eastside Reservoir Project's Late Prehistoric (A.D. 1200 to 1540) and Protohis-toric (A.D. 1540 to 1770s) periods coincide with the Little Ice Age, generally dated from A.D. 1400 to 1875. During these periods, the climate was cooler and moister, and the sites identified within the Eastside Reservoir Project area reflect a substantial increase in diversity and number, longer occupation periods, and more sedentary land use. Intensification of land use also occurred in neighboring San Gor-gonio Pass and Perris Valley. However, the role that the desiccation of Lake Cahuilla played in the popu-lation growth and in the intensification of land use in these areas is still not entirely clear (Williams and Belcourt, 2014: 13).	Please revise as follows: On the other hand, the Eastside Reservoir Project's Late Prehistoric (A.D. 1200 to 1540) and Protohis-toric (A.D. 1540 to 1770s) periods coincide with the Little Ice Age, generally dated from A.D. 1400 to 1875 (Goldberg 2001; Sutton et al. 2007). During these periods, the climate was cooler and moister, and the sites identified within the Eastside Reservoir Project area reflect a substantial increase in diversity and number, longer occupation periods, and more sedentary land use. Intensification of land use also occurred in neighboring San Gor-gonio Pass and Perris Valley (Bean et al. 1991, Wilke 1974). However, the role that the desiccation of Lake Cahuilla played in the popu-lation growth and in the intensification of land use in these areas is still not entirely clear ~~(Williams and Belcourt, 2014: 13)~~. (Schaefer 1994; Laylander 2006).
D.7-6	Due to the inland geographical location of the Cahuilla and Serrano territories, the Spanish institutions did not directly affect them as much (Williams and Belcourt, 2014:13).	Please revise as follows: Due to the inland geographical location of the Cahuilla and Serrano territories, the Spanish institutions did not directly affect them as much ~~(Williams and Belcourt, 2014:13)~~. (Strong 1929; Bean 1978).
D.7-7	The Cahuilla relied on hunting rabbits and other small game, and gathering acorns, mesquite and screw beans, pinyon nuts, and cactus bulbs for subsistence. In addition, Cahuilla practiced proto-agriculture where corn, beans, squash, and melon were harvested. Cahuilla used stone mortars and pestles, manos and metates, wooden mortars, baskets, pottery, arrow shaft straighteners, willow and mesquite bows and arrows, and numerous ceremonial instruments (Williams and Belcourt, 2014:14).	Please revise as follows: The Cahuilla relied on hunting rabbits and other small game, and gathering acorns, mesquite and screw beans, pinyon nuts, and cactus bulbs for subsistence. In addition, Cahuilla practiced proto-agriculture where corn, beans, squash, and melon were harvested. Cahuilla used stone mortars and pestles, manos and metates, wooden mortars, baskets, pottery, arrow shaft straighteners, willow and mesquite bows and arrows, and numerous ceremonial instruments ~~(Williams and Belcourt, 2014:14)~~. (Bean 1972, 1978; Caricco et al. 1982).
D.7-7	Sedentary villages were located in diverse ecological zones, and exploitation of resource areas was strictly controlled by owner-ship of resource territories along family, lineage, and village lines (Williams and Belcourt, 2014:14).	Please revise as follows: Sedentary villages were located in diverse ecological zones, and exploitation of resource areas was strictly controlled by owner-ship of resource territories along family, lineage, and village lines ~~(Williams and Belcourt, 2014:14).~~ (Strong 1929).
D.7-7	These summer-fall camps were also subdivisions of the primary winter camp, being occupied by smaller clan subdivisions of the larger clan-group (Williams and Belcourt, 2014:14, 15).	Please revise as follows: These summer-fall camps were also subdivisions of the primary winter camp, being occupied by smaller clan subdivisions of the larger clan-group ~~(Williams and Belcourt, 2014:14, 15).~~ (Bean and Shipek 1978; White 1963).
D.7-7	Researchers document the Serrano as highly mobile, utilitarian-based societies, residing in per-manent villages with satellite camps spread throughout their territories. Plant and animal resources were widely dispersed across the landscape. Therefore, many collecting and food processing areas were used throughout the year as different resources became available in various life zones. The Serrano were loosely organized into exogamous clans that served as the largest autonomous political and landholding unit. There was no form of pan-tribal political union among the clans, all bonds being strictly ceremonial in nature with alignments arising along lines of economic, marital, or ceremonial reciprocity. In addition to forming bonds with other Serrano clans, they also formed alliances with Cahuilla, Chemehuevi, Gabrielino, and Cupeño groups (Williams and Belcourt, 2014: 15)	Please revise as follows: Researchers document the Serrano as highly mobile, utilitarian-based societies, residing in per-manent villages with satellite camps spread throughout their territories (Bean et al. 1981; Kroeber 1925). Plant and animal resources were widely dispersed across the landscape. Therefore, many collecting and food processing areas were used throughout the year as different resources became available in various life zones (Davis 1974). The Serrano were loosely organized into exogamous clans that served as the largest autonomous political and landholding unit (Strong 1929). There was no form of pan-tribal political union among the clans, all bonds being strictly ceremonial in nature with alignments arising along lines of economic, marital, or ceremonial reciprocity. In addition to forming bonds with other Serrano clans, they also formed alliances with Cahuilla, Chemehuevi, Gabrielino, and Cupeño groups ~~(Williams and Belcourt, 2014: 15)~~ (Bean and Smith 1978:572).

D.7-7	Serrano subsistence included gathering, hunting, and (occasionally) fishing. Material culture included a wide variety of implements, including baskets; pottery; stone milling equipment; stone, wood, and bone implements; rabbit skin blankets; and woven nets and storage pouches.	Please revise as follows: Serrano subsistence included gathering, hunting, and (occasionally) fishing. Material culture included a wide variety of implements, including baskets; pottery; stone milling equipment; stone, wood, and bone implements; rabbit skin blankets; and woven nets and storage pouches (Drucker 1937).
D.7-7	The primary factor for village choice was proximity to a year-round water source (Williams and Belcourt, 2014:15).	Please revise as follows: The primary factor for village choice was proximity to a year-round water source ~~(Williams and Belcourt, 2014:15).~~ (Strong 1929; Bean and Smith 1978).
D.7-8	In the pursuit of deserted soldiers, Fages traveled from San Diego east to the desert in Imperial County and then northwest through the San Jacinto Mountains and San Jacinto Valley towards Riverside.	Please revise as follows: In the pursuit of deserted soldiers, Fages traveled from San Diego east to the desert in Imperial County and then northwest through the San Jacinto Mountains and San Jacinto Valley towards Riverside (Leech 2004).
D.7-8	Once reaching the Peninsular Range, the expeditions headed north-northwest, with Anza's route following a similar one as Fages' from the San Jacinto Mountains and northwest through Bautista Canyon into the San Jacinto Valley (Williams and Belcourt, 2014: 16).	Please revise as follows: Once reaching the Peninsular Range, the expeditions headed north-northwest, with Anza's route following a similar one as Fages' from the San Jacinto Mountains and northwest through Bautista Canyon into the San Jacinto Valley ~~(Williams and Belcourt, 2014: 16).~~ (Bulton 1930; Rolle 1963).
D.7-9	after a decline in mission activity occurred followed by the secularization of the missions in the 1830s (Williams and Belcourt, 2014: 16, 17).	Please revise as follows: after a decline in mission activity occurred followed by the secularization of the missions in the 1830s ~~(Williams and Belcourt, 2014: 16, 17).~~(Leech 2004).
D.7-9	This portion, the northern half of the San Jacinto Viejo Rancho, became known as the *Rancho San Jacinto Nuevo y Potrero* (Williams and Belcourt, 2014:17).	Please revise as follows: This portion, the northern half of the San Jacinto Viejo Rancho, became known as the *Rancho San Jacinto Nuevo y Potrero* ~~(Williams and Belcourt, 2014:17).~~ (Leach 2004).
D.7-9	As was the case with many early Spanish, Mexican, and American overland routes, the famed Coco-Maricopa Trail that began as an Indian trail served as a mail route between Sonora Mexico and Alta California and then later as the Bradshaw Trail (Williams and Belcourt, 2014:17)	Please revise as follows: As was the case with many early Spanish, Mexican, and American overland routes, the famed Coco-Maricopa Trail that began as an Indian trail served as a mail route between Sonora Mexico and Alta California and then later as the Bradshaw Trail ~~(Williams and Belcourt, 2014:17)~~ (Bean and Mason 1962).
D.7-9	Southern California was increasingly developed and occupied as more Americans migrated to the region in pursuit of land, gold and other minerals, agriculture, and speculation interests (Williams and Belcourt, 2014:17).	Please revise as follows: Southern California was increasingly developed and occupied as more Americans migrated to the region in pursuit of land, gold and other minerals, agriculture, and speculation interests ~~(Williams and Belcourt, 2014:17).~~ (Leach 2004).
D.7-10	Known as the Bradshaw Trail, the route followed ancient Cahuilla and Maricopa trails that linked wells and springs located throughout the desert (Williams and Belcourt, 2014:18).	Please revise as follows: Known as the Bradshaw Trail, the route followed ancient Cahuilla and Maricopa trails that linked wells and springs located throughout the desert ~~(Williams and Belcourt, 2014:18).~~ (Vredenburgh et al. 1981).

D.7-10	Until the coming of paved roads and automobiles in the 1930s, the railroad served as the major transportation artery across the deserts (Williams and Belcourt, 2014:18).	Please revise as follows: Until the coming of paved roads and automobiles in the 1930s, the railroad served as the major transportation artery across the deserts ~~(Williams and Belcourt, 2014:18).~~ (Fickwirth 1992; Myrick 1962).
D.7-10	Much of the old U.S. 60 is still preserved, with some sections in the desert remaining virtually untouched since it ceased to be a legislative route. Additional evidence of U.S. 60 can still be seen in stacks of highway survey monuments used by construction workers while upgrading the road to federal conditions as dictated by the 1926 mandate (Williams and Belcourt, 2014:18).	Please revise as follows: Much of the old U.S. 60 is still preserved, with some sections in the desert remaining virtually untouched because it ceased to be a legislative route. Additional evidence of U.S. 60 can still be seen in stacks of highway survey monuments used by construction workers while upgrading the road to federal conditions as dictated by the 1926 mandate ~~(Williams and Belcourt, 2014:18).~~(Cooper 2004).
D.7-10	The MWD also established better infrastructure in the desert with the grading of new roads, a water supply system, power lines, and telephone lines, leading to new towns associated with the construction of the CRA (Williams and Belcourt, 2014:18, 19).	Please revise as follows: The MWD also established better infrastructure in the desert with the grading of new roads, a water supply system, power lines, and telephone lines, leading to new towns associated with the construction of the CRA ~~(Williams and Belcourt, 2014:18, 19).~~ (Gruen 1988).
D.7-30	The following significance criteria apply to cultural resources: □ The Proposed Project would cause an adverse effect or substantial adverse change in the character-istic of a historic property or Traditional Cultural Property as defined by federal guidelines. □ The Proposed Project would cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines. □ The Proposed Project would cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.	Because impacts are likely but not inevitable, SCE recommends the following revisions: The following significance criteria apply to cultural resources: □ The Proposed Project ~~would~~ could cause an adverse effect or substantial adverse change in the character-istic of a historic property or Traditional Cultural Property as defined by federal guidelines. □ The Proposed Project ~~would~~ could cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines. □ The Proposed Project ~~would~~ could cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources.

D.7-30 through 31	The following significance criteria apply to cultural resources: □□The Proposed Project would cause an adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines. □□The Proposed Project would cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines. □□The Proposed Project would cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources. □□The Proposed Project could uncover, expose, and/or damage Native American human remains. Under all of these criteria, adverse changes and impacts include the following: □□Physical, visual, or audible disturbance resulting from construction, operation, and development that would affect the integrity of a resource or the qualities that make it eligible for the NRHP or CRHR; □□Exposure of cultural resources to vandalism or unauthorized collecting; □□A substantial increase in the potential for erosion or other natural processes that could affect cultural resources; or □□Neglect of a cultural resource that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe.	For accuracy, please revise as follows: ~~The following significance criteria apply to cultural resources:~~ According to the CEQA Checklist and Section 106, a project causes a potentially significant impact when the project will: • ~~The Proposed Project would~~ cause an adverse effect or substantial adverse change in the characteristic of a historic property or Traditional Cultural Property as defined by federal guidelines. • ~~The Proposed Project would~~ cause a substantial adverse change in the characteristics of a significant cultural resource or unique archaeological site as defined by State of California guidelines. • ~~The Proposed Project would~~ cause a substantial adverse change in the characteristics of a cultural resource included in a local register of historical resources. • ~~The Proposed Project could~~ uncover, expose, and/or damage Native American human remains. Under all of these criteria, adverse changes and impacts include the following: • Cause a physical, visual, or audible disturbance resulting from construction, operation, and development that would affect the integrity of a resource or the qualities that make it eligible for the NRHP or CRHR; • ~~Exposure of~~ expose cultural resources to vandalism or unauthorized collecting; • Cause a substantial increase in the potential for erosion or other natural processes that could affect cultural resources; or • Cause neglect of a cultural resource that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to a Native American tribe
D.7-33	Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties	No direct impacts to known historic properties were identified in the DEIR/DEIS. Please revise as follows: Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties
D.7-33	Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties	No direct impacts to known historic properties were identified in the DEIR/DEIS. Please revise as follows: Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties
D.7-33	Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties	Impacts are possible, but not inevitable. Please revise as follows: Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties
D.7-33	Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties	Impacts are possible, but not inevitable. Please revise as follows: Mitigation Measures for Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties

D.7-33	**Avoid environmentally sensitive areas.** SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Mea-sures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct con-struction monitoring). Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/his-toric resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environ-mentally Sensitive Areas (ESAs) for the duration of the Proposed Project	This measure addresses two different but separate activities - conducting surveys and protecting resources. Consistent with the heading, and because surveys are a standard regulatory requirement, please revise as follows: **Avoid environmentally sensitive areas.** ~~SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Mea-sures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct con-struction monitoring).~~ Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, ~~all historic properties/his-toric~~ these resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environ-mentally Sensitive Areas (ESAs) for the duration of the Proposed Project or as outlined in the Cultural Resource Management Plan.
D.7-34	CL-1c Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.	Please revise as follows: Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Worker's Environmental Training Program ~~training~~ so they are aware of the potential for inadvertently exposing buried archaeological deposits. ~~CL-1c~~ ~~Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.~~
D.7-35	Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains	The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows: Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains
D.7-35	Mitigation Measures for Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains	The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows: Mitigation Measures for Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains
D.7-36	Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties	The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows: Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties
D.7-36	Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains	The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows: Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains

D.7-36	Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties (Class II)	The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows: Impact CL-1: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to known historic properties (Class II)
D.7-36	***Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties (Class II)*** In the areas with connected solar projects, inadvertent direct impacts may occur to known historic prop-erties/historical resources during construction, operation and maintenance, and restoration involving ground disturbing activities. Indirect impacts could also result from inadvertent or malicious vandalism or unauthorized collection of cultural resources on the surface of sites and/or a visual disturbance resulting from construction, operation, and development that would affect the integrity of a resource. This impact is potentially significant, but will be mitigated to a less than significant level (Class II) with implementation of mitigation measures similar to Mitigation Measures CL-1a (Avoid environmentally sensitive areas), CL-1b (Develop Cultural Resources Management Plan), CL-1c (Train construction personnel), and CL-1d (Conduct construction monitoring).	The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.7-37	Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)	The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided, please revise as follows: Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ could cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)
D.7-37	***Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains (Class I)*** For the connected actions in the Desert Center and Blythe areas, unknown buried resources could be inadvertently unearthed during ground-disturbing activities. Destruction of potentially significant cultural resources would be a significant impact. In the event that a previously unknown archaeological resource is discovered, the implementation of mitigation measures similar Mitigation Measure CL-2a (Treatment of previously unidentified cultural resources) would ensure that impacts are reduced to a less than sig-nificant level (Class II). As well, unmarked burials could be inadvertently unearthed and would have to be properly treated in accordance with federal and state regulations. Nonetheless, the effect would be con-sidered adverse under the regulations in the NHPA, and therefore, treatment of the remains other than protection in place, would not reduce the impacts to a less than significant level. Impacts would remain significant (Class I).	The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.7-38	Two impacts related to cultural resources were identified for the Proposed Project.	Please revise as follows: ~~Two~~ Impact CL-1 and CL-2 ~~impacts~~ related to cultural resources were identified for the Proposed Project.
D.7-39	Two impacts related to cultural resources were identified for the Proposed Project.	Please revise as follows: ~~Two~~ Impact CL-1 and CL-2 ~~impacts~~ related to cultural resources were identified for the Proposed Project.

D.7-40	Two impacts related to cultural resources were identified for the Proposed Project.	Please revise as follows: ~~Two~~ Impact CL-1 and CL-2 ~~impacts~~ related to cultural resources were identified for the Proposed Project.
D.7-41	**D.7.4.3 Phased Build Alternative** Impact CL-1: Construction, operation and maintenance, and restoration would cause an adverse change to known historic properties Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional survey and associated additional impact analysis. The additional disturbance areas for construction activities could result in additional cultural impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.
D.7-43	Table D.7-14. Mitigation Monitoring Program – Cultural Resources	Please update these measures with the recommended changes listed above.
D.7-44	**CL-1a: Avoid environmentally sensitive areas.** SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Mea-sures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct con-struction monitoring). Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/his-toric resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environ-mentally Sensitive Areas (ESAs) for the duration of the Proposed Project	This measure addresses two different but separate activities - conducting surveys and protecting resources. Consistent with the heading, and because surveys are a standard regulatory requirement, please revise as follows: **CL-1a: Avoid environmentally sensitive areas.** ~~SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). Resources discovered during the surveys would be subject to Mitigation Mea-sures CL-1b (Develop Cultural Resource Management Plan [CRMP]) and CL-1d (Conduct con-struction monitoring).~~ Where operationally feasible, all NRHP- and CRHR-eligible resources shall be protected from direct project impacts by project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, ~~all historic properties/his-toric~~ these resources shall be avoided by all project construction, operation and maintenance, and restoration activities. Avoidance mechanisms shall include fencing off such areas as Environ-mentally Sensitive Areas (ESAs) for the duration of the Proposed Project or as outlined in the Cultural Resource Management Plan.
D.7-44	CL-1c Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing buried archaeological deposits.	Please revise as follows: Any excavation contract (or contracts for other activities that may have subsurface soil impacts) shall include clauses that require construction personnel to attend the Worker's Environmental Training Program ~~training~~ so they are aware of the potential for inadvertently exposing buried archaeological deposits.
D.7-45 through 47	None-Missing Reference	Please add the following: Bean, Lowell J. 1972. Mukat's People: The Cahuilla Indians of Southern California. University of California Press, Berkeley and Los Angeles. ____1978. Cahuilla. In California, edited by R.F. Heizer, pp. 575–587. Handbook of North American Indians, Vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington D.C.
D.7-45 through 47	None-Missing Reference	Please add the following: Bean, Lowell J., and William Marvin Mason. 1962. Diaries and Accounts of the Romero Expeditions in Arizona and California, 1823-26. W. Ritchie Press, Los Angeles.

D.7-45 through 47	None-Missing Reference	Please add the following: Bean, Lowell J., and Florence C. Shipek. 1978. Luiseño. In California, edited by R.F. Heizer, pp. 550–563. Handbook of North American Indians, vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.
D.7-45 through 47	None-Missing Reference	Please add the following: Bean, Lowell John, and Charles R. Smith. 1978. Gabrielino. In California, edited by R.F. Heizer, pp 538-549. Handbook of North American Indians, vol. 8, W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.
D.7-45 through 47	None-Missing Reference	Please add the following: Bean, Lowell J. and Sylvia B. Vane, eds. 1978. Persistence and Power: A Study of Native American Peoples in the Sonoran Desert and the Devers-Palo Verde High Voltage Transmission Line. With contributions by Lowell John Bean, Henry F. Dobyns, M. Kay Martin, Richard W. Stoffle, Sylvia Brakke Vane, and David R. M. White. Prepared by Cultural Systems Research, Inc. for Southern California Edison, Rosemead, California. California Historical Resources Information System, Eastern Information Center, University of California, Riverside. _____.1979. Native Americans of Western Riverside County California and the Devers-Mira Loma 500kV Transmission Line Route (Lamb-Canyon-Mira Loma Section). Prepared by Cultural Systems Research, Inc., Menlo Park, California, for Southern California Edison Company, Rosemead, California.
D.7-45 through 47	None-Missing Reference	Please add the following: Bean, Lowell J. Sylvia B. Vane, Michael Lerch, and Jackson Young. 1981. Native American Places in the San Bernardino National Forest, San Bernardino and Riverside Counties, California. Report prepared by Cultural Systems Research, Inc., Menlo Park, for the US Forest Service, South Zone Contracting Office, Arcadia, California.
D.7-45 through 47	None-Missing Reference	Please add the following: Bean, Lowell J., Sylvia B. Vane, and Jackson Young. 1991. The Cahuilla Landscape: The Santa Rosa and San Jacinto Mountains. Menlo Park, CA: Ballena Press.
D.7-45 through 47	None-Missing Reference	Please add the following: Bolton, Herbert E. 1930. Anza's California Expeditions, Vols. I–IV. University of California Press, Berkeley.
D.7-45 through 47	None-Missing Reference	Please add the following: Cooper, Casey. 2004. U.S. Highway 60. In, Historic California U.S. Highways. Electronic document, http://gbcnet.com/ushighways/US60/US60.html, accessed April 2005.
D.7-45 through 47	None-Missing Reference	Please add the following: Crabtree, Robert H. 1981. Archaeology. In A Cultural Resources Overview of the Colorado Desert Planning Units. Eric W. Ritter, Series editor. Report on file, PSSCFO, BLM, Palm Springs, CA.

D.7-45 through 47	None-Missing Reference	Please add the following: Davis, James T. 1974. Trade Routes and Economic Exchange Among the Indians of California. Publications in Archaeology, Ethnology, and History 3. Ballena Press, Ramona, California.
D.7-45 through 47	None-Missing Reference	Please add the following: DeCarlo, Matthew M., and Diane L. Winslow. 2015a. With contributions by Audry Williams and Andrew Belcourt. Engineering Refinements Survey and Recommendation of Eligibility for Cultural Resources with Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. _____2015b. With contributions by Audry Williams and Andrew Belcourt. Results of Archaeological Testing at Guachama Rancheria, P-36-002311; CA-SBR-2311H, for the Southern California Edison Company's West of Devers Upgrade Project, San Bernardino County, California. _____2015c. With contributions by Audry Williams and Andrew Belcourt. Cultural Resources Impact Assessment and Evaluation Status for the Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.
D.7-45 through 47	None-Missing Reference	Please add the following: Drucker, Philip. 1937. Culture Element Distributions: V, Southern California. University of California Anthropological Records 1(1).
D.7-45 through 47	None-Missing Reference	Please add the following: Fickewirth, A.A. 1992. California Railroads. Golden West Books, San Marino, California.
D.7-45 through 47	None-Missing Reference	Please add the following: Goldberg, Susan. 2001. Land Use, Mobility, and Intensification Evaluation and Refinement of the Model. In Metropolitan Water District of Southern California, Eastside Reservoir Project, Final Report of Archaeological Investigations, Volume IV: Prehistoric Archaeology Synthesis of Findings, edited by S. K. Goldberg, Chapt. 14. Report prepared by Applied Earthworks, Hemet, California for Metropolitan Water District of Southern California, Los Angeles.
D.7-45 through 47	None-Missing Reference	Please add the following: Gruen, J. Philip. 1998. Historic American Engineering Record, Colorado River Aqueduct from Colorado River to Lake Mathews, Parker Dam Vicinity, San Bernardino County, California. HAER CA-226. National Park Service, Washington, D.C.
D.7-45 through 47	None-Missing Reference	Please add the following: Hall, Matt E. 1993. Archaeology of Seven Prehistoric Sites in Tiefort Basin, Fort Irwin, San Bernardino County, California.
D.7-45 through 47	None-Missing Reference	Please add the following: Horne, Melinda C., and Dennis P. McDougall. 1997. Cultural Resource Survey in the Southern Portion of the National Training Center, Fort Irwin, San Bernardino County, California.

D.7-45 through 47	None-Missing Reference	Please add the following: Kroeber, Alfred L. 1907. Shoshonean Dialects of California. University of California Publications in American Archaeology and Ethnology 4(3):66–165. ____.1925. Handbook of the Indians of California. American Bureau of Ethnology Bulletin 78. Washington, D.C.
D.7-45 through 47	None-Missing Reference	Please add the following: Laylander, Don. 2006. The Regional Consequences of Lake Cahuilla. San Diego State University Occasional Archaeology Papers 1:59-77. http://soap.edu/Volume1/Lake Cahuilla/cahuilla.htm
D.7-45 through 47	None-Missing Reference	Please add the following: Love, Bruce, and Marian Dahdul. 2002. Desert Chronologies and the Archaic Period in the Coachella Valley. Pacific Coast Archaeology Society Quarterly 38(1–2).
D.7-45 through 47	None-Missing Reference	Please add the following: Lech, Steve. 2004. Along the Old Roads: A History of the Portion of Southern California That Became Riverside County, 1772–1893. Steve Lech, Riverside, California
D.7-45 through 47	None-Missing Reference	Please add the following: McDonald, A. Meg. 1992. Indian Hill Rockshelter and Aboriginal Cultural Adaptation in Anza-Borrego Desert State Park, southeastern California. Unpublished Ph.D. dissertation, Department of Anthropology, University of California, Riverside.
D.7-45 through 47	None-Missing Reference	Please add the following: Miller, Wick R. 1984. The Classification of the Uto-Aztecan Languages Based on Lexical Evidence. International Journal of American Linguistics 50(1):1–24.
D.7-45 through 47	None-Missing Reference	Please add the following: Moratto, Michael J. 1984. California Archaeology. Academic Press.
D.7-45 through 47	None-Missing Reference	Please add the following: Myrick, David F. 1962. Railroads of Nevada and Eastern California. Howell-North Books, Berkeley.
D.7-45 through 47	None-Missing Reference	Please add the following: Rolle, A. F. 1963. California: A History. Thomas Y. Crowell Company, New York, New York.
D.7-45 through 47	None-Missing Reference	Please add the following: Schaefer, Jerry. 1994. The Challenge of Archaeological Research in the Colorado Desert: Recent Approaches and Discoveries. Journal of California and Great Basin Anthropology 16(1):60–80.

D.7-45 through 47	None-Missing Reference	Please add the following: Schaefer, Jerry and Don Laylander. 2007. The Colorado Desert: Ancient Adaptations to Wetlands and Wastelands. In, California Prehistory: Colonization, Culture, and Complexity, edited by T. L. Jones and K. A. Klar, pp. 247–257. Alta Mira Press.
D.7-45 through 47	None-Missing Reference	Please add the following: Strong, William D. 1929. Aboriginal Society in Southern California. University of California Publications in American Archaeology and Ethnology 26(1):1–358. Berkeley.
D.7-45 through 47	None-Missing Reference	Please add the following: Sutton, Mark Q., Mark E. Basgall, Jill K. Gardner, and Mark W. Allen. 2007. Advances in Understanding Mojave Desert Prehistory. In, California Prehistory: Colonization, Culture, and Complexity. Edited by Terry L. Jones and Kathryn A. Klar, pp. 229–245. Alta Mira Press.
D.7-45 through 47	None-Missing Reference	Please add the following: Vredenburgh, Larry M., Gary L. Shumway, and Russell D. Hartill. 1981. Desert Fever: An Overview of Mining in the California Desert Living West Press, Canoga Park, California.
D.7-45 through 47	None-Missing Reference	Please add the following: Warren, Claude N. 1984. The Desert Region. In California Archaeology, edited by M. J. Moratto, pp. 339–430.Academic Press, Orlando, Florida.
D.7-45 through 47	None-Missing Reference	Please add the following: Warren, Claude N., and Robert H. Crabtree. 1986. Prehistory of the Southwestern Area. In Great Basin, edited by W. L. D'Azevedo, pp.183–193. Handbook of the North American Indians, Vol. 11. W.C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.
D.7-45 through 47	None-Missing Reference	Please add the following: Weide, David L. 1974. Regional Environmental History of the Yuha Desert. In Background to Prehistory of the Yuha Desert Region, edited by P.J. Wilke, pp. 9-20. Ballen Press Anthropological Papers 5. Ramona.
D.7-45 through 47	None-Missing Reference	Please add the following: White, Raymond C. 1963. Luiseño Social Organization. University of California Publications in American Archaeology and Ethnology 48(2):91–194.

D.7-45 through 47	None-Missing Reference	Please add the following: Wilke, Philip. 1974. Settlement and Subsistence at Perris Reservoir: A Summary of Archaeological Investigations. In Perris Reservoir Archaeology, edited by J. F. O'Connell, P. J. Wilke, T. F. King, and C. L. Mix, pp. 20–30. California Department of Parks and Recreation Reports No. 14. Sacramento. _____.1978. Late Prehistoric Human Ecology at Lake Cahuilla, Coachella Valley, California. Contributions of the University of California Archaeological Research Facility 38. University of California, Berkeley.
D.7-45 through 47	SCE (Southern California Edison). 2014. Archival Research and Evaluation Results of 33 Cultural Resources for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. Assembled by Williams, Audry, and Andrew Belcourt, with con-tributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall. August.	Please add the following: ~~SCE (Southern California Edison)~~ Williams, Audry, and Andrew Belcourt. 2014. With con-tributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall. ~~2014.~~ Archival Research and Evaluation Results of 33 Cultural Resources for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California. Prepared by SCE. ~~Assembled by Williams, Audry, and Andrew Belcourt, with con-tributions by Roderic McLean, Katie Vallaire, Natalie Brodie, and Jacqueline Hall.~~ August.
SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE		
D.8-1	In addition to the 220 kV upgrades, the Proposed Project includes: □ Upgrading substation equipment for 220 kV lines (Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations) and 66 kV lines (Timoteo and Tennessee Substations)	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. In addition to the 220 kV upgrades, the Proposed Project includes: □ Upgrading substation equipment for 220 kV lines (Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations) ~~and 66 kV lines (Timoteo and Tennessee Substations)~~
D.8-2	Substation Upgrades. The work required inside Etiwanda, Timoteo, and Tennessee Substations would consist of upgrades to and/or replacement of existing equipment.	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations: Substation Upgrades. The work required inside Etiwanda~~, Timoteo, and Tennessee~~ Substation~~s~~ would consist of upgrades to and/or replacement of existing equipment.
GEOLOGY AND SOILS		
D.9-27 through 28	***Impact G-1: Project structures could be damaged by surface fault rupture at crossings of active and potentially active faults (Class II)*** For solar projects in the Desert Center and Blythe areas, regional seismic events could expose facilities to damage. Implementation of designs that comply with state and local building codes and other regula-tions would reduce seismic effects by ensuring that occupied buildings are constructed to withstand seismic shaking. Consistent with regulations and facility design standards (e.g., California Building Code, Title 24, Part 2), solar projects would implement measures that would reduce the likelihood of structural failure in the event of an earthquake. This impact is less than significant with mitigation (Class II).	The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

D.9-28	***Impact G-3: Erosion could be triggered or accelerated due to construction activities (Class II)*** For the identified connected action projects, disturbance of existing soil and/or desert pavement could result in a substantial increase in on-site wind- and waterborne soil erosion. However, project design features, compliance with regulatory requirem tion measures referenced with respect to connected actions are not intended to be imposed on SCE nor are they required ent related to fugitive dust control, and standard SWPPP BMPs would ensure that erosion due to project construction activities is minimized. For example, the Desert Harvest Project would implement Mitigation Measures MM AIR-1 (Fugitive Dust Control Plan), MM AIR-2 (Fugitive Dust Control of Unpaved Roads), and MM WAT-4 (Surface Water Protection Plan and Drainage Design Specifications) and the Palen Project has similar requirements regarding com-pliance with air quality and water regulations. Comparable measures would apply to other solar proj-ects. Compliance with applicable regulations and mitigation measures of known projects would ensure that impacts are at a less than significant level with mitigation (Class II).	The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.9-29	***Impact G-5: Project structures could be damaged by problematic soils exposing people or structures to hazards (Class II)*** For solar facilities identified as connected actions, potential hazards could be effectively mitigated by incorporating recommendations contained in required project geotechnical evaluation. As well, structures must meet the requirements of all applicable federal, State, and county permits and building codes. Application of standard design and construction practices and implementation of typical mitigation measures would help avoid damage to project structures as result of problematic soils. Impacts would be less than significant with mitigation (Class II).	The DEIR/DEIS should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.9-33 through 35	**D.9.4.3 Phased Build Alternative** ***Impact G-1: Project structures could be damaged by surface fault rupture at crossings of active and potentially active faults*** ***Impact G-2: Project structures could be damaged by seismically induced groundshaking and/or ground failures, such as landslides and liquefaction-related phenomena, exposing people or structures to hazards*** ***Impact G-3: Erosion could be triggered or accelerated due to construction activities*** ***Impact G-4: Slope instability, such as landslides, could be triggered or accelerated due to construction activities*** ***Impact G-5: Project structures could be damaged by problematic soils exposing people or structures to hazards***	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional geology impacts beyond those analyzed for the Phased Build Alternative (in the DEIR/DEIS), and could be greater than those identified for the Proposed Project.
D10 HAZARDS AND HAZARDOUS MATERIALS		
D.10-4	Hazardous substances are defined by federal and State regulations to protect public health and the environment.	For accuracy, please make the following revisions: Hazardous substances are defined by federal and State regulations **in order** to protect **human** health and the environment.

D.10-5	Clean Water Act The United States Environmental Protection Agency (EPA) implements provisions of the CWA through a variety of regulations, including the National Contingency Plan and the Oil Pollution and Prevention Regulations.	For clarity, please make the following revision: The United States Environmental Protection Agency (EPA) implements provisions of the CWA through a variety of regulations, including the National Contingency Plan (NCP) and the Oil Pollution and Prevention Regulations.
D.10-6	Oil Pollution and Prevention Regulation The oil pollution regulation contains two major types of requirements: prevention requirements (SPCC Rule) and Facility Response Plan (FRP) requirements.	SPCC was not previously defined in Section D.10, although it may be defined in previous sections. Please make the following revision: The oil pollution regulation contains two major types of requirements: prevention requirements (Spill Prevention, Countermeasures, and Control (SPCC)) and Facility Response Plan (FRP) requirements.
D.10-6	Porter-Cologne Water Quality Control Act Porter-Cologne designated the State Water Resources Control Board as the ultimate authority over State water rights and water quality policy and established nine Regional Water Quality Control Boards (RWQCBs) to oversee water quality on a day-to-day basis at the local/regional level.	This is the first appearance of State Water Resources Control Board, which is later defined as SWRCB. It should be defined at this initial usage, please make the following revision: Porter-Cologne designated the State Water Resources Control Board (SWRCB) as the ultimate authority over State water rights and water quality policy and established nine Regional Water Quality Control Boards (RWQCBs) to oversee water quality on a day-to-day basis at the local/regional level.
D.10-10	**D.10.3.2 CEQA Significance Criteria** The significance criteria for assessing the impacts to hazardous materials are based on the Environmental Checklist in Appendix G of the CEQA guidelines. An impact would be considered significant if project construction or operation would: □□Create a significant hazard to the public or the environment through the routine transport, use, or dis-posal of hazardous materials. The routine storage and use of hazardous materials, principally fuels, lubricants, solvents, and paints at project staging areas, construction sites and substations could result in spills and leaks and the subsequent cleanup and disposal. □□Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Spills and acci-dental releases of fuel, oil, solvents and other hazardous materials could occur in staging yards, con-struction sites, substations, and along the transmission line during maintenance that could expose workers and the public to hazardous conditions. □□Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Gov-ernment Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. Project construction of new access roads, transmission structures, and substation upgrades could encounter pre-existing contaminated soil at known hazardous waste sites or at previ-ously unknown spill or waste sites. □□Create a significant hazard to workers that encounter residual pesticides and/or herbicides during grading or excavation in agricultural areas. Project construction on historic, recent or active agricul-tural land where the presence of residual pesticide and herbicide contamination of the soil could rep-resent a potential health hazard associated with exposure of construction workers and the public to contaminated soil.	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following: ~~□□Create a significant hazard to workers that encounter residual pesticides and/or herbicides during grading or excavation in agricultural areas. Project construction on historic, recent or active agricul-tural land where the presence of residual pesticide and herbicide contamination of the soil could rep-resent a potential health hazard associated with exposure of construction workers and the public to contaminated soil.~~

D.10-11	**HH-1a: Prepare a Hazardous Materials and Waste Management Plan. …** **Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet. □ **Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in designated areas where absorbent pad and trays are available. **Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 500 feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.	Please make the following clarifying revisions, including the reduction of the limitation from waters from 500 feet to 50 feet, as is typical for construction projects. **HH-1a: Prepare a Hazardous Materials and Waste Management Plan. …** □ **Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling ~~stations~~ would be located in ~~designated~~ areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet. □ **Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at <u>construction work areas,</u> helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in ~~designated~~ areas where absorbent pad and trays are available. **Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 50~~0~~ feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

D.10-13	HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following: □ Identifying impacted soil □ Assessing impacted soil □ Soil excavation □ Impacted soil storage □ Verification sampling □ Impacted soil characterization and disposal The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted. The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.	The mitigation measure to prepare a soil management plan is redundant of state, federal, and local requirements already in place. Please replace with the following as an alternative: ~~HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following: □ Identifying impacted soil □ Assessing impacted soil □ Soil excavation □ Impacted soil storage □ Verification sampling □ Impacted soil characterization and disposal The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted. The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.~~ **HH-2a: Observe exposed soil for evidence of contamination.** During grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor shall stop work until the material is properly characterized and appropriate measures are taken to protect human health and the environment. The contractor shall comply with all local, state, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials. Additionally, in the event that evidence of contamination is observed, the contractor shall document the exact location of the contamination and shall notify the CPUC or BLM, describing proposed actions. A weekly report listing encounters with contaminated soils and describing actions taken shall be submitted to the CPUC or BLM.
D.10-14	**HH-3a: Identify pesticide/herbicide contamination.** Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.	To clarify that SCE is only responsible for excavated materials impacted by the project, and to remove redundancies, as the regulatory agencies would be notified of the existence of hazardous materials by the hazardous wastes manifests, SCE suggests the following edits: **HH-3a: Identify pesticide/herbicide contamination.** Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated project materials containing elevated levels of pesticide or herbicide will require special handling and disposal ~~procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options.~~ In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

D.10-16	***Impact HH-1: Improper handling, storage, or accidental spills or releases of hazardous materials could result in harm to the public, project workers, or the environment (Class II)*** For connected solar projects in the Desert Center and Blythe areas, the potential for improper handling, storage, or accidental spills or releases of hazardous materials to harm to the public, project workers, or the environment would be reduced by implementation of typical mitigation measures. For both the Palen and Desert Harvest projects (CEC, 2014 and BLM, 2012), this impact was found to be less than sig-nificant with mitigation (Class II). With implementation of typical mitigation, Impact HH-1 also would be less than significant with mitigation for connected solar PV projects (Class II).	The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.10-16-17	***Impact HH-2: Ground disturbance could result in mobilization of contaminants currently existing in the soil, creating potential pathways of exposure to humans or other sensitive receptors (Class II for Proposed Project; Class II or Class III for Connected Actions)*** For the connected actions in the Desert Center area, based on the Phase I Environmental Site Assess-ment for the Palen Solar Power Project, this impact was found to be less than significant (Class III). For the Desert Harvest Solar Project, this impact was found to be less than significant with mitigation (Class II). For the other connected solar projects in the Desert Center and Blythe areas, Phase I Environ-mental Site Assessments would be required. The findings of the assessments would establish measures to treat any existing contamination discovered. This impact would be less than significant impact with typical mitigation applied (Class II).	The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.10-17	***Impact HH-3: Ground disturbance could result in mobilization of pesticides and herbicides in agricultural soils, creating potential pathways of exposure to humans or other sensitive receptors (Class II)*** For connected solar projects, Phase I Site Assessments and implementation of mitigation measures similar to those for the Proposed Project (see Section D.10.3.3) would reduce this impact to less than signifi-cant with mitigation (Class II).	The DEIR/DEIS should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.10-20 through 21	D.10.4.3 Phased Build Alternative Impact HH-1: Improper handling, storage, or accidental spills or releases of hazardous materials could result in harm to the public, project workers, or the environment Impact HH-2: Ground disturbance could result in mobilization of contaminants currently existing in the soil, creating potential pathways of exposure to humans or other sensitive receptors Impact HH-3: Ground disturbance could result in mobilization of pesticides and herbicides in agricultural soils, creating potential pathways of exposure to humans or other sensitive receptors	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional hazards and hazardous materials impacts beyond those analyzed for the Phased Build Alternative and could be greater than those identified for the Proposed Project.

D.10-24	**Table D.10-1. Mitigation Monitoring Program – Hazards and Hazardous Materials** **HH-1a: Prepare a Hazardous Materials and Waste Management Plan. …** **Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet. **Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in designated areas where absorbent pad and trays are available. **Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 500 feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.	Please see recommended clarifying edits, including the reduction of the limitation from waters from 500 feet to 50 feet, as is typical for construction projects: **Table D.10-1. Mitigation Monitoring Program – Hazards and Hazardous Materials** **HH-1a: Prepare a Hazardous Materials and Waste Management Plan. …** **Fueling and Maintenance of Construction Equipment:** Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Refueling and maintenance procedures may require vehicles and equipment to be refueled on site or by tanker trucks. Procedures will require the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling ~~stations~~ would be located in ~~designated~~ areas where absorbent pad and trays would be available. The fuel tanks would also contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials such as paints, solvents, and penetrants would be kept in an approved locker or storage cabinet. **Fueling and Maintenance of Helicopters:** Written procedures for fueling and maintenance of helicopters would be prepared prior to construction. Procedures may require helicopters be refueled at construction work areas, helicopter staging areas or local airports. Procedures would include the use of drop cloths made of plastic, drip pans and trays to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling areas would be located in ~~designated~~ areas where absorbent pad and trays are available. **Emergency Release Response Procedures:** An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. The plan must prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. Hazardous materials shall not be stored near drains or waterways. Fueling shall not take place within 50~~0~~ feet of drains or waterways. All construction personnel, including environmental monitors, would be made aware of state and federal emergency response reporting guidelines for accidental spills.

D.10-24	HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following: □ Identifying impacted soil □ Assessing impacted soil □ Soil excavation □ Impacted soil storage □ Verification sampling □ Impacted soil characterization and disposal The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted. The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.	The mitigation measure to prepare a soil management plan is redundant of state, federal and local requirements already in place. Please replace with the following as an alternative: ~~HH-2a: Prepare a Soil Management Plan. A Soil Management Plan shall be developed and implemented for construction of the Proposed Project. The objective of the Soil Management Plan is to provide guidance for the proper handling, onsite management, and disposal of impacted soil that might be encountered during construction activities. The plan would include practices that are consistent with the California Title 8, Occupational Safety and Health Administration (Cal-OSHA) regulations, as well as appropriate remediation standards that are protective of the planned use. Appropriately trained professionals would be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. The Soil Management Plan would provide guidelines for the following:~~ ~~□ Identifying impacted soil~~ ~~□ Assessing impacted soil~~ ~~□ Soil excavation~~ ~~□ Impacted soil storage~~ ~~□ Verification sampling~~ ~~□ Impacted soil characterization and disposal~~ ~~The plan shall outline how Project construction crews would identify, handle, and dispose of potentially contaminated soil; identify the qualifications of the appropriately trained professionals that would monitor soil conditions and conduct soil sampling during construction; coordinate laboratory testing; and oversee disposal. The Plan shall identify the anticipated field screening methods and appropriate regulatory limits to be applied to determine proper handling and disposal. The Soil Management Plan shall also include requirements for documenting and reporting incidents of encountered contaminants, such as documenting locations of occurrence, sampling results, and reporting actions taken to dispose of contaminated materials. In the event that potentially contaminated soils were encountered within the footprint of construction, soils would be tested and stockpiled. The appropriate Certified Unified Program Agency (CUPA) or RWQCB would determine whether further assessment is warranted.~~ ~~The Soil Management Plan shall be submitted to the CPUC and BLM 30 days prior to the start of construction for review and approval.~~ **HH-2a: Observe exposed soil for evidence of contamination.** During grading or excavation work, the construction contractor shall observe the exposed soil for visual evidence of contamination. If visual contamination indicators are observed during construction, the contractor shall stop work until the material is properly characterized and appropriate measures are taken to protect human health and the environment. The contractor shall comply with all local, state, and federal requirements for sampling and testing, and subsequent removal, transport, and disposal of hazardous materials. Additionally, in the event that evidence of contamination is observed, the contractor shall document the exact location of the contamination and shall notify the CPUC or BLM, describing proposed actions. A weekly report listing encounters with contaminated soils and describing actions taken shall be submitted to the CPUC or BLM.

D.10-24	**HH-3a: Identify pesticide/herbicide contamination.** Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan). As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options. In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.	To clarify that SCE is only responsible for excavated materials impacted by the project, and to remove redundancies, as the regulatory agencies would be notified of the existence of hazardous materials by the hazardous wastes manifests, please make the following revisions: **HH-3a: Identify pesticide/herbicide contamination.** Prior to construction, soil samples shall be collected in construction areas that where the land has historically or is currently being used for agriculture and would be subject to ground disturbance by the project. The sampling is to identify the possible presence of and to delineate the extent of pesticide and/or herbicide contamination. Excavated <u>project</u> materials containing elevated levels of pesticide or herbicide will require special handling and disposal procedures ~~consistent with the requirements of Mitigation Measure HH-2a (Prepare a soils management plan)~~. ~~As appropriate, State, Riverside County and San Bernardino County regulatory agencies shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options.~~ In the event pesticide or herbicide contamination is found, CPUC/BLM shall be notified of the event and shall be kept apprised of the steps taken to address the problem.

LAND USE AND BLM REALTY

D.11-2

Table D.11-2. General Plan Land Uses for the Proposed Project by Jurisdiction (acres)

Jurisdiction	Agricult	Commer	Industri	Offic	Ope n Spa	Publi c Facilit	Resident	Speci fic Plan	Transp or-tation	Total
Banning	81.6	7.6	36.2	44.4	152.3	4.6	155.3	0.0	0.0	482.0
Beaumont	0.0	9.3	0.0	0.0	123.4	0.0	115.9	0.6	0.0	249.3
Calimesa	0.0	7.6	0.0	0.0	0.0	0.0	20.2	111.3	0.0	139.1
Colton	0.0	0.0	0.0	0.0	0.0	0.0	0.0	71.3	0.0	71.3
Grand Terrace	0.0	0.0	0.0	0.0	0.0	0.0	5.9	0.0	0.0	5.9
Loma Linda	0.0	7.9	1.6	9.6	141.9	0.0	15.7	153.9	3.8	334.4
Palm Springs	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rancho	0.0	0.0	12.7[1]	0.0	0.0	0.0	0.0	0.0	0.0	12.7
Redlands	0.8	55.6	2.1	0.0	133.4	14.9	0.0	0.0	0.0	206.7
San Bernardino	0.0	0.0	0.0	0.0	0.0	0.0	3.1	0.0	0.0	3.1
Yucaipa	0.0	0.0	0.0	0.0	0.0	0.0	1.9[2]	0.0	0.0	1.9
County of	0.0	20.4	307.1	0.0	937.0	245.3	424.8	0.2	3.1	1,937.
County of San	0.0	67.2	38.4	3.8	16.7	1.8	53.3	0.0	3.3	184.5
TOTAL	82.4	175.5	385.4	57.8	1,504.	266.5	794.2	337.3	10.2	3,611.

1 - Acreage of Etiwanda Substation
2 - Acreage of Tennessee Substation

Please remove the following references to Tennessee Substation and Yucaipa.

Table D.11-2. General Plan Land Uses for the Proposed Project by Jurisdiction (acres)

Jurisdiction	Agricultura	Commercia	Industrial	Office	Open Space	Public Facilitie s	Residentia	Specifi c Plan	Transpor - tation	Total
Banning	81.6	7.6	36.2	44.4	152.3	4.6	155.3	0.0	0.0	482.0
Beaumont	0.0	9.3	0.0	0.0	123.4	0.0	115.9	0.6	0.0	249.3
Calimesa	0.0	7.6	0.0	0.0	0.0	0.0	20.2	111.3	0.0	139.1
Colton	0.0	0.0	0.0	0.0	0.0	0.0	0.0	71.3	0.0	71.3
Grand Terrace	0.0	0.0	0.0	0.0	0.0	0.0	5.9	0.0	0.0	5.9
Loma Linda	0.0	7.9	1.6	9.6	141.9	0.0	15.7	153.9	3.8	334.4
Palm Springs	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rancho Cucamonga	0.0	0.0	12.7[1]	0.0	0.0	0.0	0.0	0.0	0.0	12.7
Redlands	0.8	55.6	2.1	0.0	133.4	14.9	0.0	0.0	0.0	206.7
San Bernardino	0.0	0.0	0.0	0.0	0.0	0.0	3.1	0.0	0.0	3.1
~~Yucaipa~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~0.0~~	~~1.9[2]~~	~~0.0~~	~~0.0~~	~~1.9~~
County of Riverside	0.0	20.4	307.1	0.0	937.0	245.3	424.8	0.2	3.1	1,937.9
County of San Bernardino	0.0	67.2	38.4	3.8	16.7	1.8	53.3	0.0	3.3	184.5
TOTAL	82.4	175.5	385.4	57.8	1,504.7	266.5	794.2	337.3	10.2	3,611.0

1 - Acreage of Etiwanda Substation
2 - ~~Acreage of Tennessee Substation~~

D.11-11	LU-1a: Prepare construction notification plan. Sixty days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components: Public notice mailer. No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. If construction delays of more than seven days occur, an additional notice shall be prepared and distributed. Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities. Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.	To ensure that the mitigation measure can be implemented successfully, please make the following revisions: **LU-1a Prepare construction notification plan.** ~~Sixty~~ Forty-five days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components: **Public notice mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential proper-ties, retail and commercial businesses, wilderness and recreation facilities, and public facili-ties (e.g., schools and memorial parks). The notice shall state the type of construction activi-ties that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. ~~If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.~~ Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities. Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

D.11-10	For the purposes of this Land Use analysis, land use impacts may be significant if the Proposed Project would: □□Directly or indirectly disrupt an established or recently approved land use.	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following: ~~□□Directly or indirectly disrupt an established or recently approved land use.~~
D.11-13	***Impact LU-1: Project would disrupt an established or recently approved land use (Class II)*** Construction and operation of the connected solar projects could temporarily disrupt some existing land uses, including recreation and agriculture, and would cause temporary impacts related to traffic, noise, and aesthetics. With implementation of Mitigation Measure LU-1a (Prepare construction notification plan) and the mitigation measures identified above, this impact would be less than significant (Class II).	The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.11-15 through 16	**D.11.4.3 Phased Build Alternative** ***Impact LU-1: Project would disrupt an established or recently approved land use***	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study. The additional disturbance areas and the increased duration could result in additional land use impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

D.11-18	LU-1a: Prepare construction notification plan. Sixty days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components: Public notice mailer. No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential properties, retail and commercial businesses, wilderness and recreation facilities, and public facilities (e.g., schools and memorial parks). The notice shall state the type of construction activities that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. If construction delays of more than seven days occur, an additional notice shall be prepared and distributed. Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities. Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.	To ensure that the mitigation measure can successfully be implemented, please make the following revisions: **LU-1a Prepare construction notification plan.** ~~Sixty~~ Forty-five days prior to construction, SCE shall prepare and submit a Construction Notification Plan to the CPUC and BLM for approval. The Plan shall identify the procedures to ensure that SCE will inform property and business owners of the location and duration of construction, identify approvals that are needed prior to posting or publication of construction notices, and include template copies of public notices and advertisements (i.e., formatted text). The details of notification, as described below, may be modified in consultation with CPUC and BLM as warranted by circumstances. To ensure effective notification of construction activities, the plan shall address at a minimum the following components: **Public notice mailer.** No less than 15 days prior to construction that would affect property access, a public notice mailer shall be distributed. The notice shall identify construction activities that would restrict, block, or require a detour to access existing residential proper-ties, retail and commercial businesses, wilderness and recreation facilities, and public facili-ties (e.g., schools and memorial parks). The notice shall state the type of construction activi-ties that will be conducted, and the location and duration of construction. SCE shall mail the notice to all residents or property owners within 300 feet of the right-of-way and to specific public agencies with facilities that could be impacted by construction. ~~If construction delays of more than seven days occur, an additional notice shall be prepared and distributed.~~ Newspaper advertisements. Fifteen days prior to construction, within a route segment a newspaper advertisement shall be placed in local newspapers and bulletins of general circulation in the area. The advertisement shall state when and where construction will occur and provide information on the public liaison person and hotline identified below. If construction is delayed as noted above, an additional round of newspaper ads shall be placed to discuss the status and schedule of construction. Public venue notices. Thirty days prior to construction, notice of construction shall be posted at public venues such as trail crossings, rest stops, desert centers, resource management offices (e.g., Bureau of Land Management field offices, San Bernardino National Forest Ranger Station), and other public venues to inform residents and visitors of the purpose and schedule of construction activities. For public trail closures, SCE shall post information regarding the closure and any related trail detour at applicable resource management offices and post the notice within 2 miles north and south of any such point of trail closure and detour. For recreation facilities, the notice shall be posted along the access routes to known recreational destinations that would be restricted, blocked, or detoured and shall provide information on alternative recreation areas that may be used during the closure of these facilities. Public liaison person and toll-free information hotline. SCE shall identify and provide a public liaison person before and during construction to respond to concerns of neighboring property owners about noise, dust, and other construction disturbance. Procedures for reaching the public liaison officer via telephone or in person shall be included in notices distributed to the public. SCE shall also establish a toll-free telephone number for receiving questions or complaints during construction and shall develop procedures for responding to callers. Procedures for handling and responding to calls shall be addressed in the Construction Notification Plan. SCE shall provide CPUC and BLM an itemized monthly summary of complaints and inquiries received and their resolution. This shall include the name and telephone number of the caller, if provided, and the location and resolution of the complaint or inquiry.

MINERAL RESOURCES		
D.12-7	**MR-1a Coordinate with quarry operations.** Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management person-nel. The consultation will include identification of locations of active mining and coordina-tion of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant oper-ations. A plan to avoid or minimize interference with mining operations shall be prepared in conjunction with the quarry operators prior to construction. Prior to construction in the quarry area, SCE shall provide CPUC and BLM documentation that an agreement has been reached with the quarry	SCE's APM MIN-1 was not mitigating an impact and was included simply to note that coordination would occur with the quarry. It should be noted that SCE's typical property rights would support the construction regardless of mining activities. SCE recommends the following language be included in the mitigation measure: **MR-1a: Coordinate with quarry operations.** Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared by SCE documenting how coordination with the quarry operators is expected to occur. ~~in conjunction with the quarry operators prior to construction.~~ Prior to construction in the quarry area, SCE shall provide CPUC and BLM a copy of this plan. ~~documentation that an agreement has been reached with the quarry~~
D.12-8	***Impact MR-1: Construction activities would render known mineral resources inaccessible (Class II)*** For the connected solar projects, as with the Proposed Project, construction impacts to known mineral resources would be temporary and would not result in the loss of availability of those resources. Mitiga-tion Measure MR-1a (Coordinate with quarry operations) would reduce the potential to interfere with quarry (or mining) operations and render mineral resources temporarily inaccessible by coordination with operators and preparation of a plan to minimize interference with plant operations. This impact would be less than significant with mitigation (Class II).	The DEIR should clarify that the potential mitigation measures referenced for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.12-9 through 10	**D.12.4.3 Phased Build Alternative** ***Impact MR-1: Construction activities would render known mineral resources inaccessible***	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional mineral impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

<table>
<tr><td>D.12-11</td><td>MR-1a Coordinate with quarry operations. Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management person-nel. The consultation will include identification of locations of active mining and coordina-tion of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant oper-ations. A plan to avoid or minimize interference with mining operations shall be prepared in conjunction with the quarry operators prior to construction. Prior to construction in the quarry area, SCE shall provide CPUC and BLM documentation that an agreement has been reached with the quarry</td><td>SCE's APM MIN-1 was not mitigating an impact and was included simply to note that coordination would occur with the quarry. It should be noted that SCE's typical property rights would support the construction regardless of mining activities.

SCE recommends the following language be included in the mitigation measure:

MR-1a: Coordinate with quarry operations. Prior to construction within the Banning Rock Plant No. 66, SCE would consult with the plant owners and plant operations and management personnel. The consultation will include identification of locations of active mining and coordination of construction activities in and through those areas and to determine the best way to proceed with project construction, all with the goal of minimizing any disruption to plant operations. A plan to avoid or minimize interference with mining operations shall be prepared by SCE documenting how coordination with the quarry operators is expected to occur. ~~in conjunction with the quarry operators prior to construction.~~ Prior to construction in the quarry area, SCE shall provide CPUC and BLM a copy of this plan. ~~documentation that an agreement has been reached with the quarry~~</td></tr>
<tr><td colspan="2">D13 NOISE</td></tr>
<tr><td>D.13-14</td><td>SCE's description of the project does not include rock blasting or use of explosives for any portion of con-struction. Similarly, the project does not include splicing conductors through the use of implosive sleeves, which detonate explosives to fuse the conductors. However, if these construction methods were used, they would create instantaneous or short-term noise.</td><td>SCE's Proponent's Environmental Assessment (PEA) included a description of potential rock blasting as well as the potential use of implosive sleeves (SCE 2013, p 4.12-32). For consistency with SCE's PEA, please modify as follows:

SCE's description of the project ~~does not~~ included the potential for rock blasting and/or use of explosives for implosive sleeves during ~~or use of explosives for~~ ~~any portion of~~ con-struction. ~~Similarly, the project does not include splicing conductors through the use of implosive sleeves, which detonate explosives to fuse the conductors.~~ However, if these construction methods are ~~were~~ used, they would create instantaneous or short-term noise.</td></tr>
<tr><td>D.13-14</td><td>Construction of foundations for new towers, poles, and shoo-fly structures would require use of a drill rig or large auger at each location. Pile driving would not be needed. Access and spur roads would require use of graders, compactors, dozers, and trucks.</td><td>Currently the SCE civil designs include the installation of soldier pile walls which require the use of pile driving equipment. Please modify the DEIR/DEIS language as follows:

Construction of foundations for new towers, poles, and shoo-fly structures would require use of a drill rig or large auger at each location. Pile driving equipment could be used for the installation of solider pile-type retaining walls, though most are expected to be drilled piers. ~~would not be needed.~~ Access and spur roads would require use of graders, compactors, dozers, and trucks.</td></tr>
<tr><td>D.13-16</td><td>Table D.13-6. Construction Noise Levels Modeled for Specific Locations (dBA)
<table><tr><th>Location</th><th>Typical Receptor Distance (ft)</th><th>Receptor Jurisdiction</th><th>Lmax (dBA)</th><th>Leq (dBA)</th></tr><tr><td>San Bernardino Substation</td><td>875</td><td>Redlands</td><td>59.5</td><td>52.3</td></tr><tr><td>Vista Substation</td><td>50</td><td>Grand Terrace</td><td>84.4</td><td>83.3</td></tr><tr><td>El Casco Substation</td><td>950</td><td>Calimesa</td><td>55.1</td><td>49.5</td></tr><tr><td>Devers Substation</td><td>1,000</td><td>Riverside County</td><td>58.4</td><td>50.3</td></tr><tr><td>Etiwanda Substation</td><td>50</td><td>Rancho Cucamonga</td><td>75.0</td><td>71.0</td></tr><tr><td>Timoteo Substation</td><td>50</td><td>Loma Linda</td><td>77.6</td><td>77.3</td></tr><tr><td>Tennessee Substation</td><td>50</td><td>Yucaipa</td><td>77.6</td><td>77.3</td></tr><tr><td>Telecommunications Facilities</td><td>50</td><td>Typical Facilities</td><td>77.6</td><td>76.8</td></tr></table>Source: SCE, 2013 (PEA Appendix K).</td><td>As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations:

<table><tr><td>~~Timoteo Substation~~</td><td>~~50~~</td><td>~~Loma Linda~~</td><td>~~77.6~~</td><td>~~77.3~~</td></tr><tr><td>~~Tennessee Substation~~</td><td>~~50~~</td><td>~~Yucaipa~~</td><td>~~77.6~~</td><td>~~77.3~~</td></tr></table></td></tr>
</table>

D.13-16	Helicopter operations, especially if necessary at night to string conductor across the highways, would likely cause annoyance to residences in the vicinity.	Helicopters will not be used at night for construction of the WOD Upgrade Project,; please make the following revision: Helicopter operations~~, especially if necessary at night to string conductor across the highways,~~ would likely cause annoyance to residences in the vicinity.
D.13-16	Safety precautions may require homes near helicopter activity to be temporarily vacated, and this would help to minimize exposure of residents to helicopter noise.	Please make the following clarifying edits: In areas where ~~S~~safety precautions may require homes near helicopter activity to be temporarily vacated, SCE will utilize other methods to conduct the work that do not require helicopters in these locations, ~~and this would help to minimize exposure of residents to helicopter noise."~~
D.13-17	SCE identifies two specific helicopter models that would be used, the Bell 500 (MD 500) and the Kaman Kmax, which carries loads.	In the PEA, SCE referenced these two helicopters as models that would be "assumed" to be used for the purpose of impact analysis. The actual helicopter models used will be equivalent to those "assumed" for the purposes of analysis, i.e., light and medium duty helicopters. Please make the following revision: SCE identifies two specific helicopter models that would be typically used, the Bell 500 (MD 500) and the Kaman Kmax, which carries loads.
D.13-17	With implementation of the recommended mitigation measures, the construction activities would either comply with local noise ordinances, or SCE would request a variance from each affected jurisdiction.	Please see SCE's accompanying cover letter for additional discussion related to reasons why the requirement to obtain a variance from local jurisdictions for noise impacts should be stricken or revised. Given the CPUC's preemptive authority, please delete the reference to local noise variances: With implementation of the recommended mitigation measures, the construction activities would either comply with local noise ordinances, or SCE would inform the CPUC, BLM, and the impacted local jurisdiction of the potential for conflict with local noise ordinances.
D.13-18	***Mitigation Measures for Impact N-1*** Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction.	Please see SCE's accompanying cover letter for additional discussion related to reasons why the requirement to obtain a variance from local jurisdictions for noise impacts should be stricken or revised, and as noted if the language is not removed, SCE proposes revised language, as follows: ***Mitigation Measures for Impact N-1*** Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, ~~daytime, weekday hours (7:00 a.m. to 6:00 p.m.)~~ or an alternative schedule ~~established by~~ provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances.

D.13-18	Table D.13-9 presents the mitigation monitoring program for noise. **Table D.13-9. Mitigation Monitoring Program – Noise** **MITIGATION MEASURE** **N-1a: Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction: □ Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction. □ Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. □ Stationary noise sources (e.g., generators, pumps) and staging areas shall be shielded from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts. □ Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible. □ Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.	For consistency with the edits suggested in prior comments, please make the following revisions: **N-1a: Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction: □ Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, ~~daytime, weekday hours (7:00 a.m. to 6:00 p.m.)~~ or an alternative schedule ~~established by~~ provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances. □ Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. □ If noise levels at the adjacent noise sensitive receptor location exceed applicable jurisdictional criteria, ~~S~~stationary noise sources (e.g. generators, pumps) ~~and~~ at staging areas and on the ROW shall be shielded at the source to the extent necessary to meet the jurisdictional noise levels, if feasible. ~~from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, When utilized and if feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cuts.~~ □ Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible. □ Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.
D.13-18	**N-1b: Implement a helicopter noise control strategy**. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering within 250 feet of residences.	SCE is requesting that additional clarification relating to the duration of hovering be included in the mitigation measure to be consistent with SCE's PEA Volume 3, Page 4.12-26. Additionally, as the analysis suggests, the use of helicopter noise could only exceed local noise standards within the City of Banning and Calimesa, therefore it is appropriate that the mitigation measure be revised to specify that it only applies to helicopter use within those two jurisdictions: Please make the following revision: **N-1b: Implement a helicopter noise control strategy**. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet radial distance of residences. The noise control strategy should be applied to helicopter construction within the cities of Banning and Calimesa.
D.13-18	The description of the project (Section B, Description of Proposed Project) does not include use of explo-sives or blasting that could cause ground-borne vibration at levels capable of causing structural damage to buildings in the immediate vicinity. Other construction activities would not involve sources likely to cause any structural damage outside of the work areas. No impact-pile driving would occur.	As described in previous comments, the project may include blasting, the use of explosives for implosive sleeves, and pile driving. Please make the following revisions: The ~~description of the~~ Proposed Pproject ~~(Section B, Description of Proposed Project) does not include~~ may include the use of explo-sives or blasting that could cause ground-borne vibration; these would not be expected to be at levels capable of causing structural damage to buildings in the immediate vicinity. Other construction activities would not involve sources likely to cause any structural damage outside of the work areas. ~~No impact-pile driving would occur.~~

D.13-22	D.13.3.5 CEQA Significance Determination for Proposed Project and Connected Actions Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances (Class I)	As noted in the WOD PEA, the Proposed Project's construction activities would typically occur during the time periods allowed by the local jurisdiction's municipal code. Therefore, construction noise generated by the Proposed Project would result in less than significant impacts related to the exposure of persons to or generation of noise levels in excess of standards established in the local general plan, local noise ordinance, or applicable standards of other agencies.
D.13-23	***Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances (Class I)*** For connected actions in the Desert Center and Blythe areas, construction noise would be temporary and would be reduced by implementation of typical mitigation measures. Temporary construction noise was found less than significant with mitigation for both the Palen Solar Power Project and Desert Harvest Solar Project (Class II). For the other solar projects, where their locations are not known, con-struction noise occurring at the perimeter of the other solar projects would be the primary source of dis-ruption to the nearest receptor. The level of construction noise could occasionally be substantially higher than ambient noise levels if sensitive receptors are located adjacent to the work area. Mitigation would reduce the impact, but could violate local rules, standards, or ordinances. Further, construction may be required outside usually allowed hours under the applicable noise regulation. Therefore, Impact N-1 is considered significant and unavoidable for confidential connected actions (Class I).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.13-28 through 29	D.13.4.3 Phased Build Alternative Impact N-1: Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances Impact N-2: Construction activity would temporarily cause groundborne vibration	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional noise impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.
D.13-29	Corona noise levels at the edge of the ROW would be less than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) would not substantially increase due to corona noise for any segment of the Phased Build Alternative	Because of the reduced conductor size selected for the Phased Build Alternative, the conductor surface voltage gradient will be greater than it would be for the Proposed Project, therefore, the corona noise generated by the conductor will certainly be greater. However, when combined with other ambient noise, it is uncertain how much, if any, total noise would actually increase. Please make the following revisions: Corona noise levels at the edge of the ROW would be <u>greater</u> ~~less~~ than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) <u>could</u> ~~would~~ ~~not substantially~~ increase due to corona noise for any segment of the Phased Build Alternative.
D.13-30	Corona noise levels at the edge of the ROW would be less than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) would not substantially increase due to corona noise for any segment of the Phased Build Alternative	Because of the reduced conductor size selected for the Phased Build Alternative, the conductor surface voltage gradient will be greater than it would be for the Proposed Project, therefore, the corona noise generated by the conductor will certainly be greater. However, when combined with other ambient noise, it is uncertain how much, if any, total noise would actually increase. Please make the following revisions: Corona noise levels at the edge of the ROW would be <u>greater</u> ~~less~~ than those of the Proposed Project. For all locations, permanent day-night or 24-hour noise levels (Ldn or CNEL) <u>could</u> ~~would~~ ~~not substantially~~ increase due to corona noise for any segment of the Phased Build Alternative.

D.13-32	Table D.13-9 presents the mitigation monitoring program for noise. **Table D.13-9. Mitigation Monitoring Program – Noise** **MITIGATION MEASURE** **N-1a: Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction: □ Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule established by the local jurisdiction. □ Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. □ Stationary noise sources (e.g., generators, pumps) and staging areas shall be shielded from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts. □ Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible. □ Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.	Consistent with previous comments, please modify language to the following bullet points 1 and 3: **N-1a: Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction: □ Construction noise shall be confined to those hours specified by the local jurisdiction ordinances, ~~daytime, weekday hours (7:00 a.m. to 6:00 p.m.)~~ or an alternative schedule ~~established by~~ provided that SCE informs the CPUC, BLM, and the impacted local jurisdiction that construction work will occur outside of the hours specified by local jurisdiction noise ordinances. □ Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. □ If noise levels at the adjacent noise sensitive receptor location exceed applicable jurisdictional criteria, ~~S~~stationary noise sources (e.g. generators, pumps) ~~and~~ at staging areas and on the ROW shall be shielded at the source to the extent necessary to meet the jurisdictional noise levels, if feasible. ~~from adjacent noise-sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, When utilized and if feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cuts.~~ □ Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible. □ Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.
D.13-	MITIGATION MEASURE **N-1b: Implement a helicopter noise control strategy**. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering within 250 feet of residences.	SCE is requesting additional clarification relating to the duration for hovering be included in the mitigation measure to be consistent with SCE's PEA Volume 3, Page 4.12-26. Additionally, as the analysis suggests the use of helicopter noise could only exceed local noise standards within the City of Banning and Calimesa, therefore it is appropriate that the mitigation measure be revised so implementation is specific to only helicopter use within those two jurisdictions: Please make the following revision: **N-1b: Implement a helicopter noise control strategy**. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet radial distance of residences. The noise control strategy should be applied to helicopter construction within the cities of Banning and Calimesa.
D14 PALEOTOLOGICAL		
D.14-2	First paragraph, 3rd line of D.14.1.1 Regional Setting and Approach to Data Collection Paleontological resources, or fossils are the evidence of once-living organisms preserved in the rock record	Please revise as follow: Paleontological resources, or fossils are the evidence of once-living organisms preserved in the ~~rock~~ geologic record

D.14-16	First sentence of the first paragraph. The loss of any identifiable fossil that could yield information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.	The DEIR/DEIS incorrectly assumes that the Proposed Project will have unanticipated discoveries and that resource could not be avoided. Please revise as follows: Significant paleontological resources are defined as "identifiable" vertebrate fossils, uncommon invertebrates and plants, and trace fossils that provide a critical piece of paleobiological or geologic data, illustrate a geological principle, or occupy a unique stratigraphic position (SVP, 2010). The loss of any significant ~~identifiable fossil~~ paleontological resource ~~that could,~~ which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.
D14-18	*Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources*	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: *Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.*
D14-18	Under heading Impact PAL-1: Construction within these segments has the potential to destroy valuable resources, and mitigation is required.	The CEQA criteria relates to significance rather than value. Please revise as follows: Construction within these segments has the potential to destroy or disturb significant paleontological ~~valuable~~ resources, and mitigation is required
D14-18	*Mitigation Measures for Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources*	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: *Mitigation Measures for Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources*
D14-19	PAL-1b 4th bullet: The Plan shall define monitoring procedures and methodology, and shall specify that sedi-ments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. The Qualified Paleontological Monitor shall have at least a B.S in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material.	SCE suggests deleting the last sentence of this bullet and creating a separate bullet for qualification of monitors under PAL-1d Monitor construction for paleontological resources (see below). Please revise as follows: The Plan shall define monitoring procedures and methodology, and shall specify that sedi-ments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. ~~The Qualified Paleontological Monitor shall have at least a B.S in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material~~.
D14-19	PAL-1c Starting on the 5th line: Training shall inform all construction personnel that Environmentally Sensitive Areas (ESAs) include areas determined to paleontologically sensitive as defined on the paleontological sensitivity maps for the project, and must be avoided and that travel and construction activity must be confined to designated roads and areas.	An ESA is an exclusion zone that cannot be entered. All paleontological sensitive areas are not automatically an ESA. Please revise as follows: Training shall inform all construction personnel that designated Environmentally Sensitive Areas (ESAs) ~~include areas determined to paleontologically sensitive as defined on the paleontological sensitivity maps for the project~~, ~~and~~ must be avoided and that travel and construction activity must be confined to designated roads and areas.

D14-20	PAL-1c All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of ~~paleontological~~ resources.	SCE contracts for construction require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please remove this measure as follows: ~~PAL-1c~~ ~~All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources.~~
D14-20	PAL-1d Sediments of very low (PFYC 1), low (PFYC 2), or unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as determined by the Qualified Paleontologist).	There is no justification to require monitoring of very low (PFYC 1) or low (PFYC 2) sediments. Per SVP 2010, very low and low sediments do not require monitoring by a qualified paleontologist. Please revise as follows: Sediments of ~~very low (PFYC 1), low (PFYC 2), or~~ unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as outlined in the Plan ~~determined by the Qualified Paleontologist~~).
D14-20	PAL-1d Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construc-tion equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. The monitor will immediately (within 24 hours) report the discovery to the CPUC and BLM. Con-struction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance.	Edits to the mitigation measure are suggested for consistency for SVP 2010 and the order of discovery of resources. Please revise as follows: Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. ~~The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present~~. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construc-tion equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. ~~The monitor~~ SCE will ~~immediately (within 24 hours)~~ report the discovery to the CPUC and BLM <u>within 24 hours and/or as outlined in the Plan</u>. Con-struction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance. <u>If indicators of potential microvertebrate fossils are found, screening of a test sample shall be carried out as outlined in SVP 2010. This procedure will be outlined in the Plan.</u>

D.14-20	PAL-1d Removed qualification of monitors from section PAL-1b and add to PAL-1d **Monitor construction for paleontological resources.**	SCE suggests adding a new bullet point to PAL-1d to include all potential qualifications from SVP 2010. Please revise as follows: Paleontological resource monitors per SVP 2010 shall have the equivalent of the following qualifications: 1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or 2. AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or 3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project. 4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques
D.14-21	PAL-1e Second paragraph: All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all fieldwork is completed.	Please change themitigation measure to include time for analyzing remains in the lab prior to prepping them for curation., as follows: All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all ~~fieldwork~~ analyses are completed.
D.14-21	Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. lease revise as follows: Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.
D.14-21	Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).
D.14-22	One impact related to paleontological resources was identified for the Proposed Project.	Please revise as follows: ~~One impact related to paleontological resources was identified for t~~The Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.
D.14-22	Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

D.14-22	***Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class II)*** For the connected actions, construction-related ground disturbance resulting from development of con-nected action projects in Desert Center and Blythe areas could result in adverse impacts to paleontolog-ical resources, including disturbance, damage, or destruction of a significant fossil; destruction of a unique geologic feature associated with a paleontological site; or disturbance or destruction of a paleontological site, which results in the loss of scientific context of fossil remains. Should paleontological resources be discovered during construction-related activities associated with the projects, they would be subject to federal and State legal requirements discussed in Section D.14.2 above and would be required to imple-ment mitigation measures similar to Mitigation Measures PAL-1a through PAL-1e to reduce any adverse impacts to paleontological resources to less than significant levels (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.14-23	Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).
D.14-23	One impact related to paleontological resources was identified for the Proposed Project.	Please revise as follows: ~~One impact related to paleontological resources was identified for t~~The Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.
D.14-23	Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.
D.14-23	Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).
D.14-24	One impact related to paleontological resources was identified for the Proposed Project.	The analysis should state what the impact is. Please revise as follows: ~~One impact related to paleontological resources was identified for t~~The Proposed Project identified that, the loss of any significant paleontological resource, which yields information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact.
D.14-24	Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources.	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources.

D.14-24	Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources (Class III).	The DEIR/DEIS incorrectly assumes that the Proposed Project will destroy or disturb significant paleontological resources. Please revise as follows: Impact PAL-1: Construction of the project ~~would~~ could destroy or disturb significant paleontological resources (Class III).
D.14-24	**D.14.4.3 Phased Build Alternative** ***Impact PAL-1: Construction of the project would destroy or disturb significant paleontological resources***	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas could result in additional paleontological impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.
D.14-27	**PAL-1b: Develop Paleontological Resource Mitigation and Monitoring Plan.** Following completion and approval of the Paleontological Resources Report (required in Mitigation Measure PAL-1a) and prior to the start of ground-disturbing construction, the Applicant shall prepare and submit to CPUC and BLM for review and approval, a Paleontological Resources Mitigation and Monitoring Plan (Plan), consistent with the following requirements: □□The Plan shall be prepared by a Qualified Paleontologist and shall be based on Society of Vertebrate Paleontology (SVP) guidelines and meet all regulatory requirements. The qual-ified paleontologist shall have a Master's Degree or Ph.D. in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques. □□The Plan shall include a site-specific investigation to identify construction impact areas of moderate (PFYC 3a) to very high (PFYC 5) sensitivity for encountering significant resources and the approximate depths at which those resources are likely to be encountered for each component of each segment of the Proposed Project. □□The Plan shall require the qualified paleontological monitor to monitor all construction-related ground disturbance in sediments determined to have a moderate (PFYC 3a) to very high (PFYC 5) sensitivity. □□The Plan shall define monitoring procedures and methodology, and shall specify that sedi-ments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. The Qualified Paleontological Monitor shall have at least a B.S. in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material. □□The Plan shall state which resources will be avoided and which shall be recovered for their data potential. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources. The Plan shall also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting. □□The Plan shall specify that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be carried out by qualified, permitted paleontologists with the appropriate current Paleontological Resources Use Permit.	For the reasons described above, please revise as follows: PAL-1b: Develop Paleontological Resource Mitigation and Monitoring Plan. Following completion and approval of the Paleontological Resources Report (required in Mitigation Measure PAL-1a) and prior to the start of ground-disturbing construction, the Applicant shall prepare and submit to CPUC and BLM for review and approval, a Paleontological Resources Mitigation and Monitoring Plan (Plan), consistent with the following requirements: § The Plan shall be prepared by a Qualified Paleontologist and shall be based on Society of Vertebrate Paleontology (SVP) guidelines and meet all regulatory requirements. The qualified paleontologist shall have a Master's Degree or Ph.D. in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques. § The Plan shall include a site-specific investigation to identify construction impact areas of moderate (PFYC 3a) to very high (PFYC 5) sensitivity for encountering significant resources and the approximate depths at which those resources are likely to be encountered for each component of each segment of the Proposed Project. § The Plan shall require the qualified paleontological monitor to monitor all construction-related ground disturbance in sediments determined to have a moderate (PFYC 3a) to very high (PFYC 5) sensitivity. The Plan shall define monitoring procedures and methodology, and shall specify that sedi-ments of undetermined sensitivity shall be monitored on a part-time basis (as determined by the Qualified Paleontologist). Sediments with very low or low sensitivity will not require paleontological monitoring. ~~The Qualified Paleontological Monitor shall have at least a B.S in Geology or Paleontology, and demonstrated field experience in the collection and identification of fossil material~~. § The Plan shall state which resources will be avoided and which shall be recovered for their data potential. Where possible, recovery is preferred over avoidance in order to mitigate the potential for looting of paleontological resources. The Plan shall also detail methods of recovery, preparation and analysis of specimens, final curation of specimens at a federally accredited repository, data analysis, and reporting. § The Plan shall specify that all paleontological work undertaken by the Applicant on public lands administered by BLM shall be carried out by qualified, permitted paleontologists with the appropriate current Paleontological Resources Use Permit.

D.14-28	**PAL-1c: Train construction personnel.** Prior to the initiation of construction, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. The Applicant shall complete training for all construction personnel. Training shall inform all construction personnel of the procedures to be followed upon the discovery of paleontological materials. Training shall inform all construction personnel that Environmentally Sensitive Areas (ESAs) include areas determined to be paleontologically sensitive as defined on the paleontological sensitivity maps for the project, and must be avoided and that travel and construction activity must be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of protected fossils on or off the right-of-way by the Applicant, his representatives, or employees will not be allowed. Violators will be subject to prosecution under the appropriate State and federal laws and violations will be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order. The following issues shall be addressed in training or in preparation for construction: □□All construction contracts shall include clauses that require construction personnel to attend training so they are aware of the potential for inadvertently exposing subsurface paleonto-logical resources, their responsibility to avoid and protect all such resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources. □□The Applicant shall provide a background briefing for supervisory personnel describing the potential for exposing paleontological resources, the location of any potential ESAs, and procedures and notifications required in the event of discoveries by project personnel or paleontological monitors. Supervisory personnel shall enforce restrictions on collection or disturbance of fossils. □□Upon discovery of paleontological resources by paleontologists or construction personnel, work in the immediate area of the find shall be halted and the Applicant's paleontologist notified. Once the find has been inspected and a preliminary assessment made, the Appli-cant's paleontologist will notify the BLM and CPUC and proceed with data recovery in accordance with the approved Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Resource Mitigation and Monitoring Plan).	For the reasons described above, please revise as follows: PAL-1c: Train construction personnel. Prior to the initiation of construction, all construction personnel shall be trained regarding the recognition of possible subsurface paleontological resources and protection of all paleontological resources during construction. The Applicant shall complete training for all construction personnel. Training shall inform all construction personnel that designated Environmentally Sensitive Areas (ESAs) ~~include areas determined to paleontologically sensitive as defined on the paleontological sensitivity maps for the project~~, ~~and~~ must be avoided and that travel and construction activity must be confined to designated roads and areas. All personnel shall be instructed that unauthorized collection or disturbance of protected fossils on or off the right-of-way by the Applicant, his representatives, or employees will not be allowed. Violators will be subject to prosecution under the appropriate State and federal laws and violations will be grounds for removal from the project. Unauthorized resource collection or disturbance may constitute grounds for the issuance of a stop work order. The following issues shall be addressed in training or in preparation for construction: § All construction contracts shall include clauses that require construction personnel to attend <u>environmental</u> training so they are aware of the potential for inadvertently exposing subsurface paleontological resources, their <u>role in</u> ~~responsibility to~~ avoid<u>ing</u> ~~and protect all such~~ <u>paleontological</u> resources, and the penalties for collection, vandalism, or inadvertent destruction of paleontological resources. § The Applicant shall provide a background briefing for supervisory personnel describing the potential for exposing paleontological resources, the location of any potential ESAs, and procedures and notifications required in the event of discoveries by project personnel or paleontological monitors. Supervisory personnel shall enforce restrictions on collection or disturbance of fossils. § Upon discovery of paleontological resources by paleontologists or construction personnel, work in the immediate area of the find shall be halted and the Applicant's paleontologist notified. Once the find has been inspected and a preliminary assessment made, the Applicant's paleontologist will notify the BLM and CPUC and proceed with data recovery in accordance with the approved Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Resource Mitigation and Monitoring Plan).
D.14-29	**PAL-1e: Final reporting and curation.** At the conclusion of laboratory work and museum curation, a final report will be prepared describing the results of the paleontological monitoring efforts associated with the project. The report will include a summary of the field and laboratory methods, an overview of the Proposed Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository. All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all fieldwork is completed. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Applicant.	For the reasons described above, please revise as follows: PAL-1e: Final reporting and curation. At the conclusion of laboratory work and museum curation, a final report will be prepared describing the results of the paleontological monitoring efforts associated with the project. The report will include a summary of the field and laboratory methods, an overview of the Proposed Project area geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository. All significant fossils collected will be prepared in a properly equipped paleontology laboratory to a point ready for curation no more than 60 days after all ~~fieldwork~~ <u>analyses</u> is completed. Preparation will include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Following laboratory work, all fossils specimens will be identified to the lowest taxonomic level, cataloged, analyzed, and delivered to an accredited museum repository for permanent curation and storage. The cost of curation is assessed by the repository and is the responsibility of the Applicant.

D.14-29	**PAL-1d: Monitor construction for paleontological resources.** Based on the paleontological sensitivity assessment and Paleontological Resource Mitigation and Monitoring Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Mitigation and Monitoring Plan), the Applicant shall conduct full-time construction monitoring through its qualified paleontological monitor in areas determined to have moderate (PFYC 3a) to very high (PFYC 5) sensitivity. Sediments of very low (PFYC 1), low (PFYC 2), or unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as determined by the Qualified Paleontologist). Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. The monitor will immediately (within 24 hours) report the discovery to the CPUC and BLM. Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance.	For the reasons described above and consistent with SVP 2010, please revise as follows: PAL-1d: Monitor construction for paleontological resources. Based on the paleontological sensitivity assessment and Paleontological Resource Mitigation and Monitoring Plan consistent with Mitigation Measure PAL-1b (Develop Paleontological Mitigation and Monitoring Plan), the Applicant shall conduct full-time construction monitoring through its qualified paleontological monitor in areas determined to have moderate (PFYC 3a) to very high (PFYC 5) sensitivity. Sediments of ~~very low (PFYC 1), low (PFYC 2), or~~ unknown (PFYC 3b) sensitivity shall be monitored by a qualified paleontological monitor on a part-time basis (as outlined in the Plan ~~determined by the Qualified Paleontologist~~). Monitoring will entail the visual inspection of excavated or graded areas and trench sidewalls. ~~The monitor will also screen sediments to check for the presence of microvertebrates if they are believed to be present~~. In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily halt the construction equipment around the find until it is assessed for scientific significance, and collected. A temporary construction exclusion zone (i.e., environmentally sensitive area [ESA]) of at least 50 feet, consisting at a minimum of lath and flagging tape, will be erected around the discovery. The exclusion zone acts as a buffer around the discovery and is maintained for safety. ~~The monitor~~ SCE will ~~immediately (within 24 hours)~~ report the discovery to the CPUC and BLM within 24 hours and/or as outlined in the Plan. Construction activities can occur outside the buffer if it is safe to do so. The size of the buffer may be increased or decreased once the monitor adequately explores the discovery to determine its size and significance. If indicators of potential microvertebrate fossils are found, screening of a test sample shall be carried out as outlined in SVP 2010. This procedure will be outlined in the Plan. Paleontological resource monitors per SVP 2010 shall have the equivalent of the following qualifications: 1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or 2. AS or AA in geology, paleontology, or biology and demonstrated two years of experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or 3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project. 4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.
RECREATION		
D.15-15	**Coordinate construction schedule and activities with the authorized officer for the recrea-tion area.** No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the auth-orized officer of the recreation areas listed below. SCE shall schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with, and at the discretion of the authorized officer. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations of the authorized officer. SCE shall also prepare a public notice of construction activities con-sistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with the authorized officer, and provide this documenta-tion to the CPUC and the BLM 30 days prior to construction.	To ensure that mitigation measure R-1a can successfully be implemented, please make the following revision: **R-1a: Coordinate construction schedule and activities with ~~the authorized officer~~ a representative for the recreation area**. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with ~~the authorized officer~~ a representative of the recreation areas listed below. SCE shall use best efforts to schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with~~, and at the discretion of the authorized officer~~ the representative. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations ~~of the authorized officer~~ a representative. SCE shall also prepare a public notice of construction activities con-sistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with a representative ~~the authorized officer~~, and provide this documentation to the CPUC and the BLM 30 days prior to construction.

D.15-15	**Coordinate with local agencies to identify alternative recreation areas.** SCE shall coordi-nate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.	To ensure that mitigation measure R-1b can successfully be implemented, please make the following revision: **R-1b: Coordinate with local agencies to identify alternative recreation areas.** SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and as allowed by the facility representative and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.
D.15-16	***Impact R-2: Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value*** The proposed double-circuit structures would be greater in height than the single-circuit structures, and as such the Proposed Project would alter the viewshed along the ROW (see Section D.18.3, Visual Resources). However, the number of transmission lines that would traverse the recreational areas would decrease, allowing additional space for recreation.	To accurately characterize the change in viewshed, please make the following edits: The proposed double-circuit structures would be greater in height than the single-circuit structures and would reduce the overall number of structures from three to two, and as such the Proposed Project would alter the viewshed along the ROW (see Section D.18.3, Visual Resources). ~~However, t~~ The number of transmission lines that would traverse the recreational areas would decrease, allowing additional space for recreation.
D.15-16	Recreational resources that are located in the vicinity of the ROW would potentially be affected by the siting of a new transmission line.	To accurately characterize the change in viewshed, please make the following edits: Recreational resources that are located in the vicinity of the ROW would potentially be affected by the removal of an existing transmission line and siting of a new transmission line.
D.15-18	***Impact R-1: Construction activities would temporarily reduce access and visitation to recreation areas (Class II)*** For the connected actions, temporary conflicts regarding access to recreation areas during construction of the solar projects would depend on the final location of these projects relative to recreation areas. A short-term interference with visitation to a recreation site would create a potentially significant impact. Indirect impacts to recreation areas would also occur from construction-related noise, dust, and traffic that would diminish the value of nearby recreational facilities and would contribute to a decline in visita-tion. Imposing measures similar to Mitigation Measures R-1a and R-1b would reduce the impact to a less than significant level by ensuring that the construction time frame avoids the heavy recreational use periods and by identifying alternative areas for recreation to provide the users recreational options throughout the entire construction period (Class II).	The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

D.15-19	***Impact R-2: Presence of project facilities would change the character of a recreation area, diminishing its recreational value (Class I for Connected Actions)*** **Connected Actions.** The solar generation projects that are connected to the WOD Project would intro-duce energy infrastructure into a natural and undeveloped landscape that is characterized by its scenic resources. These projects would be visible from many recreation areas, especially in the Desert Center Area and the Blythe Area where many ACECs and wilderness areas are located. In particular, the CEC concluded that the impacts on local residents, the Desert Center Airport, and recreational visitors to the Chuckwalla Valley Raceway from the effects of glint and glare would be significant. The environmental review of the Solar Harvest project concluded that construction of the project would alter the existing character of the area and may affect surrounding recreational uses as a result of the altered viewshed, including a substantial adverse effect on the wilderness experience of dispersed and occasional visitors to the Joshua Tree Wilderness Area. It is likely that glint and glare for other solar PV projects would also be significant. Implementing mitigation measures similar to those imposed on the Proposed Project for visual resources would reduce impacts to the recreational experience of these resources to the extent feasible. However, the long-term impacts to the recreational value of these resources would remain sig-nificant and unavoidable (Class I).	The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.15-19	***Impact R-3: Presence of project facilities would permanently preclude recreational activities (Class II for Connected Actions)*** **Connected Actions.** The connected projects are not anticipated to limit or preclude access to regional, city, or private recreation areas. Unlike these recreation opportunities, most BLM-managed recreational opportunities are dispersed across the desert areas. Construction of solar generation projects on BLM lands would eliminate access to these affected lands for the life of the project and could alter access to other areas. Mitigation measures would be needed to require alternate access to areas made inaccessible; such measures would make the impact less than significant (Class II).	The DEIR should clarify that potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.15-22 through 23	**D.15.4.3 Phased Build Alternative** ***Impact R-1: Construction activities would temporarily reduce access and visitation to recreation areas*** ***Impact R-2: Presence of a transmission line or substation would change the character of a recreation area, diminishing its recreational value*** ***Impact R-3: Presence of a transmission line would permanently preclude recreational activities***	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional recreation impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

D.15-25	Table D.15-3. Mitigation Monitoring Program – Recreation MITIGATION MEASURE R-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the authorized officer of the recreation areas listed below. SCE shall schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with, and at the discretion of the authorized officer. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations of the authorized officer. SCE shall also prepare a public notice of construction activities con-sistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with the authorized officer, and provide this documentation to the CPUC and the BLM 30 days prior to construction. □ Rancho Mediterranean Park □ South Hills Preserve □ Lillian V. Miller Memorial Trail □ Rest areas □ Stetson Community Park □ Noble Creek Regional Park □ Trevino Community Park □ Bike lane on Barton Road, Beaumont Avenue, Drainage and SCE Corridor Class I path, Cherry Avenue □ Norton Younglove Preserve □ San Timoteo Canyon State Park □ Cherry Valley Lakes RV Campground □ Oak Valley Golf Club and Park □ Pacific Crest Trail	To ensure that mitigation measure R-1a can successfully be implemented, please make the following revision: Table D.15-3. Mitigation Monitoring Program – Recreation MITIGATION MEASURE R-1a: Coordinate construction schedule and activities with ~~the authorized officer~~ a representative for the recreation area. No less than 30 days prior to construction that would affect recreation areas, SCE shall coordinate construction activities and the project construction schedule with the ~~authorized officer~~ a representative of the recreation areas listed below. SCE shall use best efforts to schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with~~, and at the discretion of the authorized officer~~ the representative. SCE shall locate construction equipment to avoid temporary preclusion of recreation area use whenever feasible per the recommendations ~~of the authorized officer~~ a representative. SCE shall also prepare a public notice of construction activities con-sistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan). SCE shall document its coordination efforts with a representative ~~the authorized officer~~, and provide this documentation to the CPUC and the BLM 30 days prior to construction. □ Rancho Mediterranean Park □ South Hills Preserve □ Lillian V. Miller Memorial Trail □ Rest areas □ Stetson Community Park □ Noble Creek Regional Park □ Trevino Community Park □ Bike lane on Barton Road, Beaumont Avenue, Drainage and SCE Corridor Class I path, Cherry Avenue □ Norton Younglove Preserve □ San Timoteo Canyon State Park □ Cherry Valley Lakes RV Campground □ Oak Valley Golf Club and Park □ Pacific Crest Trail
D.15-26	MITIGATION MEASURE R-1b: Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.	To ensure that mitigation measure R-1b can successfully be implemented please make the following revision: MITIGATION MEASURE R-1b: Coordinate with local agencies to identify alternative recreation areas. SCE shall coordinate with the local parks and recreation departments regarding construction activities at the park and recreation facilities listed in R-1a, in order to identify alternative recreation sites that may be used by the public. SCE shall post a public notice at recreation facilities to be closed or have limited access during construction consistent with Mitigation Measure LU-1a (Prepare Construction Notification Plan) and as allowed by the facility representative and identify any alternative recreation sites. SCE shall document its coordination with the parks and recreation departments and shall submit this documentation to the CPUC and the BLM 30 days prior to initiating project construction.

D.15-13	**D.15.3.2 CEQA Significance Criteria** According to the CEQA Environmental Checklist for assessing the impacts to recreation, a project causes a potentially significant impact if it would: □□Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. □□Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Neither of these is applicable. The Proposed Project is a transmission project with a set construction period and a small operations workforce. It does not include an increase in population that would substantially increase the use of existing neighborhood and regional parks such that a substantial physical deterioration would occur; therefore, the first CEQA Environmental Checklist significance criterion is not applicable. The Proposed Project would not require construction of recreational facilities or require the expansion of recreational facilities; therefore the second criterion is not applicable to this project and is not addressed. Although not identified in the CEQA checklist, from previous transmission projects it is known that the Proposed Project could result in impacts to recreation that: □□Would directly or indirectly disrupt activities in established recreation areas and reduce access or visitation. □□Would substantially reduce the scenic, biological, cultural, geologic, or other important factors that contribute to the value of recreational facilities or areas.	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following: ~~Although not identified in the CEQA checklist, from previous transmission projects it is known that the Proposed Project could result in impacts to recreation that:~~ ~~□□Would directly or indirectly disrupt activities in established recreation areas and reduce access or visitation.~~ ~~□□Would substantially reduce the scenic, biological, cultural, geologic, or other important factors that contribute to the value of recreational facilities or areas.~~
D16 TRANSPORTATION AND TRAFFIC		
D.16-2	D.16.1.2 Environmental Setting by Segment Major regional highways in the project vicinity include Interstate (I) highways and State Routes (SR). These are I-10, I-215, SR-60, SR-62, SR-79, and SR-111. Average daily traffic on various segments of these highways is shown in Table D.16-1. These regional highways would be used by construction workers and materials delivery trucks to reach assembly points, yards, and work sites along the project's length.	The proposed project also has a telecommunication line that crosses SR-243 near the Banning Substation. Please revise the sentence as follows: Major regional highways in the project vicinity include Interstate (I) highways and State Routes (SR). These are I-10, I-215, SR-60, SR-62, SR-79, ~~and~~ SR-111, <u>and SR-243</u>.

D.16-13	**D.16.3.2 CEQA Significance Criteria** The significance criteria for transportation and traffic impacts are based on the CEQA Guidelines Appen-dix G Checklist and on comments received during scoping of the EIR/EIS. During scoping, concerns were expressed regarding levels of traffic on local roads, truck routes on the different project segments, the need for SCE to coordinate with local agencies on the construction schedule, and the repair of any dam-age to local roads. Several commenters requested that the EIR/EIS consider the impact of road closures and potential limited access to residential streets and individual residences and businesses. Based on these criteria, transportation or traffic impacts would be significant if: □□Construction would require the temporary closure of lanes or roadways that would significantly: reduce the performance of the circulation system; create disruption of traffic flow; increase traffic congestion; restrict the movements of emergency vehicles; disrupt bus transit service; impede pedestrian and bicycle movement; and/or restrict access to residences and businesses. □□Vehicle movements associated with construction worker trips or movement of materials and equipment would result in an unacceptable reduction in level of service on the roadways in the project area. □□Construction activities would conflict with planned transportation projects in the project area. □□An increase in roadway wear and deterioration would occur as a result of being used by heavy trucks or construction equipment. □□Construction activities would result in a temporary but substantial disruption of rail traffic. □□Construction or staging activities would increase the demand for or reduce the supply of parking spaces. □□Helicopter use during construction would pose risks to public safety and create excessive noise and dust. □□Project construction cranes or permanent structures would be at heights so as to create aviation hazards or adversely affect airport or heliport facility use.	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. The following criteria are provided in the CEQA Guidelines Appendix G Checklist: a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? e) Result in inadequate emergency access? f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? As such, please remove the following: ~~□□Construction would require the temporary closure of lanes or roadways that would significantly: reduce the performance of the circulation system; create disruption of traffic flow; increase traffic congestion; restrict the movements of emergency vehicles; disrupt bus transit service; impede pedestrian and bicycle movement; and/or restrict access to residences and businesses.~~ ~~□□Vehicle movements associated with construction worker trips or movement of materials and equipment would result in an unacceptable reduction in level of service on the roadways in the project area.~~ ~~□□Construction activities would conflict with planned transportation projects in the project area.~~ ~~□□An increase in roadway wear and deterioration would occur as a result of being used by heavy trucks or construction equipment.~~ ~~□□Construction activities would result in a temporary but substantial disruption of rail traffic.~~ ~~□□Construction or staging activities would increase the demand for or reduce the supply of parking spaces.~~ ~~□□Helicopter use during construction would pose risks to public safety and create excessive noise and dust.~~ ~~□□Project construction cranes or permanent structures would be at heights so as to create aviation hazards or adversely affect airport or heliport facility use.~~
D.16-15	***Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties*** **T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall	The analysis included under heading, *T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties*, does not demonstrate that temporary impacts as a result of construction of the Proposed Project are significant thus requiring mitigation. CEQA Guidelines section, 15126.4 (3) Mitigation measures are not required for effects which are not found to be significant, therefore mitigation measure T-1a should be removed from the DEIR/DEIS.

	prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reduc-ing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent pos-sible. Parking shall not be permitted in areas with dry vegetation that could pose a fire haz-ard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact informa-tion, and the date of contact, and shall summarize discussions and/or agreements reached, if any.	Additionally, the mitigation measure requires that SCE prepare a Construction Transportation Plan with the intent to reduce construction generated traffic on regional and local roadways, where construction traffic has the potential to "significantly affect regional and local roadways." The document does not demonstrate significance, nor contain any study identifying where construction traffic or when construction traffic would be considered significant, therefore as written, the mitigation measure cannot be successfully implemented as the document does not demonstrate when the mitigation would be required. The mitigation measure also requires, "…describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reducing construction-generated additional traffic on regional and local roadways." As explained in the Transportation and Traffic section of SCE's PEA, sufficient information redundant to the requirements of the mitigation measure has been included as part of the analysis prepared for SCE's Proposed Project and is included below for reference: • Construction workers commuting to the Proposed Project site(s) would use interstates, State highways, and local roadways (p. 4-16.2) • At the beginning of each day of construction, workers would arrive at the staging areas in personal vehicles and depart the staging area in work vehicles destined for the transmission corridor (p.4-16.18) • Construction workers would typically arrive at staging yards prior to 7:00 a.m., although it is expected that some workforce traffic may arrive during the a.m. peak commute period. The length of the work day would vary by season based on available sunlight. During winter, construction workers would typically leave prior to 4:00 p.m. During summer, construction workers would typically leave after 6:00 p.m. Therefore, during most of the year, construction worker trips would occur outside of the peak commute periods and there would be no impact on traffic during the morning (a.m.) and evening (p.m.) peak periods (p. 4-16.24) Based on the reasoning provided above, Mitigation Measure T-1a should be removed. ~~***Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties***~~ ~~**T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reduc-ing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent pos-sible. Parking shall not be permitted in areas with dry vegetation that could pose a fire haz-ard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.~~ ~~At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact informa-tion, and the date of contact, and shall summarize discussions and/or agreements reached, if any.~~

D.16-15	Mitigation Measure for Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area T-4a Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall iden-tify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached. At the end of major construction, SCE shall coordinate with each affected jurisdiction to con-firm what repairs would be required. Any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation when the coordination has been completed and when the repairs have been completed.	The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination, as compared to the benefit of said coordination. SCE recommends the following revision: **MITIGATION MEASURE — MM T-4a: Repair roadways damaged by construction activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, SCE shall coordinate repairs with the affected public agencies and ensure that any such damage is repaired to the pre-construction condition within 60 days from the end of all construction within each affected county. ~~T-4a Repair roadways damaged by construction activities. If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images upon request~~. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall iden-tify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached. At the end of major construction, ~~SCE shall coordinate with each affected jurisdiction to con-firm what repairs would be required. A~~any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation ~~when the coordination has been completed and~~ when the repairs have been completed.
D.16-20	**T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way.** SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fey Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM at least 60 days prior to construction in or across rail ROWs.	The lead time as written is overly burdensome and submittal of copies of permits or approvals may not be available that far in advance of work needing to occur. Please make the following edits: **T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way.** SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fey Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM ~~at least 60 days prior to construction in or across rail ROWs~~.
D.16-24	***Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties (Class II)*** Although connected solar projects are in rural or remote locations, their construction could require brief road or land closures during certain construction activities. Depending on the site location, project con-struction could briefly affect access to adjacent properties. Implementation of typical mitigation, such as a construction transportation plan, would ensure that this impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

D.16-24	***Impact T-2: Traffic related to project construction and operation would result in unacceptable levels of service on roadways in the project area (Class II)*** With regard to connected actions, the location of solar projects in areas with generally light traffic is not expected to result in unacceptable levels of service on roadways in the vicinity of the projects. However, implementation of a construction transportation plan, including adoption of carpooling and time-of-day arrival and departure of workers, would ensure that any level of service impacts are addressed. This would result in a less than significant impact with mitigation (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.16-24	***Impact T-3: Construction would conflict with planned transportation projects (Class II)*** While conflicts between connected solar projects and planned transportation projects are unlikely, imple-mentation of a requirement that project proponents coordinate with regional transportation management agencies would ensure that this impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.16-25	***Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area (Class II)*** As with the Proposed Project, heavy trucks and equipment can cause damage to roads leading to solar project sites. Implementation of a measure to require documentation of road conditions and appropriate repair or payment for damage would ensure that this impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.16-34 through 37	**D.16.4.3 Phased Build Alternative** ***Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties*** ***Impact T-2: Traffic related to project construction and operation would result in unacceptable levels of service on roadways in the project area*** ***Impact T-3: Construction would conflict with planned transportation projects*** ***Impact T-4: Construction vehicles and equipment would potentially damage roads in the project area*** ***Impact T-5: Construction activities would cause a temporary disruption to rail traffic or operations*** ***Impact T-6: Construction would result in the short-term elimination of parking spaces*** ***Impact T-7: Use of helicopters would have potential impacts on public safety and create nuisance conditions*** ~~***Impact T-8: Operations would affect aviation safety and activities associated with public airports***~~	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional transportation and traffic impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.

D.16-39	***Mitigation Measures for Impact T-1: Road or travel lane closures for construction would adversely affect traffic flow and congestion, emergency vehicle response, pedestrians/bicyclists routes, and access to adjacent residential and business properties*** **T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reduc-ing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent pos-sible. Parking shall not be permitted in areas with dry vegetation that could pose a fire haz-ard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact informa-tion, and the date of contact, and shall summarize discussions and/or agreements reached, if any.	Consistent with the rationale provided in the comments above, the following mitigation measure should be removed: ~~**T-1a Prepare Construction Transportation Plan.** Where construction traffic has the potential to significantly affect regional and local roadways by generating additional vehicle trips, SCE shall prepare a Construction Transportation Plan (CTP) describing alternate traffic routes, timing of commutes, methods of reducing crew-related traffic, and other methods for reduc-ing construction-generated additional traffic on regional and local roadways. The CTP also shall require construction workers to park personal vehicles at yards or designated assembly points and carpool to work locations in order to limit the number of construction-related vehicles on the road. At construction sites, vehicles shall be required to park within the project ROW or approved disturbance areas or on access roads to the maximum extent pos-sible. Parking shall not be permitted in areas with dry vegetation that could pose a fire haz-ard. SCE shall submit the CTP to Caltrans and the affected local jurisdictions for review and approval at least 30 days prior to commencing construction activities.~~ ~~At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed and shall provide a copy of the final CTP. This communication shall identify persons or agencies contacted, contact informa-tion, and the date of contact, and shall summarize discussions and/or agreements reached, if any.~~
D.16-42	**T-4a: Repair roadways damaged by construction activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images. At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall identify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached. At the end of major construction, SCE shall coordinate with each affected jurisdiction to confirm what repairs are required. Any damage is to be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM confirming documentation when the coordination has been completed and when the repairs have been completed.	The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination as compared to the benefit of said coordination. SCE recommends the following revision: **MITIGATION MEASURE — MM T-4a: Repair roadways damaged by construction activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, SCE shall coordinate repairs with the affected public agencies and ensure that any such damage is repaired to the pre-construction condition within 60 days from the end of all construction within each affected county. ~~**T-4a: Repair roadways damaged by construction activities.** If roadways, sidewalks, medians, curbs, shoulders, or other such features are damaged by the project's construction activities, as determined by the affected public agency, such damage shall be repaired and streets restored to their pre-project condition by SCE. Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all construction route public roads within 500 feet in each direction of project access points (i.e., locations where vehicles leave public roads to reach project sites), and shall provide the respective local jurisdictions, CPUC, BLM, and Caltrans (if applicable) with a copy of these images.~~ At least 15 days prior to construction, SCE shall provide a letter or email to CPUC and BLM confirming that the mitigation measure has been executed. This communication shall iden-tify persons or agencies contacted, contact information, and the date of contact, and shall summarize discussions and/or agreements reached. At the end of major construction~~, SCE shall coordinate with each affected jurisdiction to con-firm what repairs would be required. A~~any damage shall be repaired to the pre-construction condition within 60 days from the end of all construction, or on a schedule mutually agreed to by SCE and the jurisdiction. SCE shall provide CPUC and BLM ~~confirming~~ documentation ~~when the coordination has been completed and~~ when the repairs have been completed.

	T-5a: Obtain required permits or approvals for crossing or working in railroad rights-of-way. SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fey Railway) to ensure project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM at least 60 days prior to construction in or across rail ROWs.	The lead time as written is overly burdensome and submittal of copies of permits or approvals may not be available that far in advance of work needing to occur. Please make the following edits: **T-5a Obtain required permits or approvals for crossing or working in railroad rights-of-way.** SCE shall obtain permits/approvals from affected railway operators (Union Pacific Railroad and Burlington Northern Santa Fey Railway) to ensure that project construction activities in the rail ROW comply with each company's safety requirements and to avoid disruption to rail traffic. Copies of required permits or approvals shall be submitted to the CPUC and BLM ~~at least 60 days prior to construction in or across rail ROWs~~.
UTILITIES AND PUBLIC SERVICES		
D.17-9	Jurisdictions within this segment include unincorporated Riverside County and the Cities of Calimesa, Beaumont, and Banning. The City of Yucaipa is included in this segment as the Tennessee Substation is located here. Unincorporated River- side County is described in Section D.17.1.2.3, Segment 3: San Timoteo Canyon. Any new information for the County is provided below.	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. Jurisdictions within this segment include unincorporated Riverside County and the Cities of Calimesa, Beaumont, and Banning. ~~The City of Yucaipa is included in this segment as the Tennessee Substation is located here~~. Unincorporated River- side County is described in Section D.17.1.2.3, Segment 3: San Timoteo Canyon. Any new information for the County is provided below.
D.17-24	In addition to the CEQA Environmental Checklist significance criteria, the following criterion was used to assess impacts to utilities because the construction would cross a large number of existing electrical or other utility systems: □□Disrupt the existing utility system or cause a collocation accident	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following: ~~In addition to the CEQA Environmental Checklist significance criteria, the following criterion was used to assess impacts to utilities because the construction would cross a large number of existing electrical or other utility systems:~~ ~~□□Disrupt the existing utility system or cause a collocation accident~~
D.17-26 through 27	**UPS-1a Use non-potable water for construction purposes.** Use non-potable water for construction purposes. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from nonpotable sources, if available, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.	The environmental analysis does not provide evidence that the temporary use of water for construction of the Proposed Project would result in a significant impact that would require mitigation. H, however, for consistency with the paraphrasing of the mitigation measure UPS-1a, , "would require SCE to use non-potable water for dust control and soil compaction whenever feasible", please make the following revision: **UPS-1a Use non-potable water for construction purposes.** Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources <u>as feasible</u>~~, if available, and ensured in a water contract through a local water agency or district.~~ The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a mini-mum of 60 days prior to the start of construction.

D.17-32	***Impact UPS-1: Project construction and operation would increase the need for public services and utilities (Class II for Proposed Project; Class II or III for Connected Actions)*** With regard to the connected actions, except for fire services, construction and operation of the solar projects would have less than significant impacts (Class III) on utilities and public services. For fire ser-vices, the operational capabilities to handle technical rescues at electrical facilities, such as confined space/trench rescue/high angle rescue, may require additional staffing, training, and equipment. New or upgraded fire facilities may be required to accommodate additional staffing and fire rescue apparatus for solar facilities. Specialized rescue equipment also may be required in order to service the proposed gen-tie lines, which will require proper storage and maintenance to ensure optimal performance in the event of an emergency. The need for additional staff, equipment, or construction of fire response facili-ties would be a significant indirect environmental impact resulting from the implementation of the solar projects, particularly in the Desert Center and Blythe areas. The Palen Solar Power Project has included funding to help the RCFD with equipment and response times. In addition, it was concluded that compli-ance with all federal, State, and local safety requirements and providing mitigation to the RCFD (in the form of funding) would be adequate to assure protection from all fire hazards, and that new and expanded facilities are not needed. If fire/rescue facilities are constructed or acquired using funds provided by solar projects, the construc-tion of such facilities would be a significant indirect environmental impact resulting from the implemen-tation of these solar projects. Typically, solar energy facilities prepare and implement a Fire Manage-ment and Protection Plan to ensure that emergency fire precautions are employed during project con-struction. Compliance with Riverside County Ordinance 659 and the resultant impact fees for fire ser-vices would help ensure that adequate new or expanded facilities are in place for projects in the affected areas. Together, the compliance with Riverside County Ordinance 659 and payment of impact fees similar to mitigation from the Palen Solar Power Project would reduce this impact to less than sig-nificant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.17-33	***UPS-2: Construction would disrupt existing pipelines and utility systems or cause a collocation accident (Class II).*** Similar impacts would occur for connected actions when located in the vicinity of pipelines and utilities, and similar mitigation would be required (Class II)	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.17-39	**UPS-1a**: **Use non-potable water for construction purposes.** Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources, if available, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a minimum of 60 days prior to the start of construction.	The environmental analysis does not provide evidence that the temporary use of water for construction of the Proposed Project would result in a significant impact that would require mitigation. H, however, for consistency with the paraphrasing of the mitigation measure UPS-1a, , "would require SCE to use non-potable water for dust control and soil compaction whenever feasible", please make the following revision: **UPS-1a Use non-potable water for construction purposes.** Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources as feasible~~, if available, and ensured in a water contract through a local water agency or district.~~ The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the CPUC and BLM a mini-mum of 60 days prior to the start of construction.

VISUAL RESOURCES		
Figures D.18-1 through D.18-6	**General Comment identifying issues associated with CPUC Preferred Alternative** Figures D.18-1 through D.18-6 comprise a set of maps that are all on the same base – i.e. they all show the entire route and label the individual line segments. The six maps differ from one another only in that each of the maps presents the results of GIS visibility analyses run for each of the individual line segments.	The map set referenced does not provide enough information to track the analysis and assess the relevance and accuracy of the findings. This is particularly true for those findings related to the impacts of the alternatives, for which no simulations have been provided.
Figures D-18-8A through D.18-25.B	**General Comment identifying issues associated with CPUC Preferred Alternative** The key observation point (KOP) figures present an existing photo of each view and simulations for each view of what the view would look like with the project in place. In two cases, simulations are also provided that depict how the views would appear should the FAA require marker balls.	There are no simulations that depict the appearance of the project alternatives. Such simulations are necessary to provide a basis for comparing the visual effects of the proposed project with those of the project alternatives in order to determine whether, in what way, and to what extent the visual effects of the alternatives could be different from those of the proposed project. Thus, there is no evidence for the conclusion that there would be significant unmitigable impacts under the proposed project but that the impacts would be less than significant under the Phased Build Alternative.
D.18-10	**San Timoteo Canyon Road.** The linear viewpoint analysis addressed the full extent of San Timoteo Canyon Road (see Figure D.18-7C) from its intersection with Barton Road in the north to its southern terminus with Oak Valley Parkway, a linear distance of almost 11.5 miles (northbound travel direction). As shown in Table D.18-8, the Proposed Project would be either not visible (due to screening by terrain and roadside vegetation) or visible but not noticeable for approximately 46 percent of the combined (northbound-southbound) travel distance of slightly more than 22.6 miles. However, given the Proposed Project's relatively close proximity to San Timoteo Canyon Road and frequent superior (elevated) loca-tion along the southern ridgeline, the Proposed Project would be prominently visible for 43 percent of the combined travel distance. However, at no point would the Proposed Project appear to be a dominant visual feature.	For clarification, please make the following revision: **San Timoteo Canyon Road.** The linear viewpoint analysis addressed the full extent of San Timoteo Canyon Road (see Figure D.18-7C) from its intersection with Barton Road in the north to its southern terminus with Oak Valley Parkway, a linear distance of almost 11.5 miles (northbound travel direction). As shown in Table D.18-8, the Proposed Project would be either not visible (due to screening by terrain and roadside vegetation) or visible but not noticeable for approximately 46 percent of the combined (northbound-southbound) travel distance of slightly more than 22.6 miles. Given the Proposed Project's relatively close proximity to San Timoteo Canyon Road and frequent superior (elevated) loca-tion along the southern ridgeline, the Proposed Project would be prominently visible for 43 percent of the combined travel distance <u>consistent with the visibility of the current energy transmission infrastructure</u>. However, at no point would the Proposed Project appear to be a dominant visual feature.
D.18-11	Viewer Concern. High. Although energy transmission infrastructure dominates the foreground views from the park within the corridor, from adjacent residential neighborhoods, and from roads that are spanned by the ROW and adjacent to the park, viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #1, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same. The environmental setting fails to recognize or make mention of the prominence of the 66 kV lines that would be removed from the ROW. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

D.18-12	Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground views from the residential neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change.	The environmental setting recognizes, that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #2, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.
D.18-13	Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #3, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.
D.18.14	Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape, residents and travelers on San Timoteo Canyon Road would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridges) an adverse visual change	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #4, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting.

D.18-15	Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background ridges or sky) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #5, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same, and the view towards the mountains and sky is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.
D.18-15	Viewer Concern. High. Although energy transmission infrastructure dominates the foreground views from the park within the corridor, from adjacent residential neighborhoods, and from roads that are spanned by the ROW and adjacent to the park, viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #6, the Proposed Project incorporates the use of similar lattice steel structures. Although these towers are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the park is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

D.18-16	Viewer Concern. High. Visitors to the golf course and adjacent residents expect to see a landscape with high aesthetic appeal, characterized by a mosaic of natural and managed vegetative forms. Any additional intrusion of built structures with industrial character or blockage of views from any of the golf course grounds would be seen as an adverse visual change.	The environmental setting fails to recognize that energy transmission infrastructure dominates the foreground views from a variety of locations. The text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #7, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the greenbelt is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider that "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location becausee the number of structures would be reduced.
D.18-16	Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky and Mt. San Jacinto) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #8, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.

D.18-17	Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground of views from the adjacent neighborhood, residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #9, the Proposed Project incorporates the use of similar lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting, especially in regard to this location because the number of structures would be reduced.
D.18-18	Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape at the base of the hills, travelers on Bluff Street and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, hills, and mountains) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #10, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.
D.18-18	Viewer Concern. High. Although the foreground landscape is disturbed, and existing utility infrastructure is noticeable in views from Hathaway Street, travelers and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, hills, and mountains) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure is noticeable from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #11, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

D.18-18 through 19	**General Comment identifying issues associated with CPUC Preferred Alternative** ***KOP 11 – Hathaway Street in Banning*** Figure D.18-18A presents a life-size scale view to the northeast toward the Proposed Project across the southwest corner of the Morongo Tribal Lands, from the entrance to the Summit Ridge Apartments on Hathaway Street, in eastern Banning. The view encompasses the ROW as it passes across the corner of the tribal lands, north of I-10, and adjacent to the eastern border of the City of Banning. The San Bernar-dino Mountains provide a backdrop of visual interest in views to the north and northeast. **Visual Quality.** Low to Moderate. The foreground landscape is disturbed and undeveloped, is generally lacking features of visual interest, and exhibits minimal visual variety. Existing utility infrastructure (distantly visible) further compromises views of the background San Bernardino Mountains, which do provide a backdrop of visual interest. **Viewer Concern.** High. Although the foreground landscape is disturbed, and existing utility infrastruc-ture is noticeable in views from Hathaway Street, travelers and adjacent residents would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape fea-tures (background sky, hills, and mountains) an adverse visual change. **Viewer Exposure.** Moderate to High. The Proposed Project would be highly visible in the foreground views from travelers on Hathaway Street and adjacent residences. The number of viewers would be Low, and the duration of view would be Extended. Combining the four equally weighted factors (i.e., visibility, distance zone, number of viewers, and duration of view) results in an overall rating of Moder-ate to High for viewer exposure. **Overall Visual Sensitivity.** Moderate to High. For viewers in the vicinity of KOP 11, combining the equally weighted Low to Moderate visual quality, High viewer concern, and Moderate to High viewer exposure results in an overall rating of Moderate to High for visual sensitivity of the visual setting and viewing characteristics.	The discussion of visual quality and viewer concern should be revised to reflect the fact that the area in the immediate foreground of the view is used by the Orco Block Company. Because of this use of the site, the surface of the site is highly disturbed. Street View photos of the site taken from Hathaway Street in front of the apartment complex show large piles of concrete blocks stacked up in the area immediately to the east of the fence along Hathaway street, and a number of large, industrial-appearing features on the site, including several large steel buildings and a cluster of stacks and silos. Because of the presence of this Orco Block operation in the immediate foreground of the view, the view is far from pristine, and thus the level of visual quality would be more accurately characterized as low to moderate and the level of concern as moderate. The assessment of viewer exposure should be lowered to moderate, at most. In reality, the numbers of viewers and the duration of viewers and the duration of views would be lower than is asserted here. The Summit Ridge apartment complex is internally focused, with only some of the buildings fronting along Hathaway Street. As a result, for most of the units in the complex views toward the east where the proposed transmission line would be located, the views are blocked by the buildings on the east side of the complex. For those units located in buildings along the complex's eastern perimeter, views toward the proposed transmission alignment are screened by large trees planted in the landscape strip that borders the edge of the complex along Hathaway Street. For most residences of the Summit Ridge Apartment, views looking toward the project would only occur as they exit the apartment complex onto Hathaway Street. These views would be of short duration and given the need fordrivers to pay attention to traffic as they turn onto Hathaway Street, it is reasonable to assume that the attention paid to the distant view may be limited. For drivers traveling on Hathaway Street, the elapsed time on this segment of the street would be low and their view toward the transmission line alignment would be outside of their primary cone of vision. Taking into account the contextual factors and the at-most moderate level of viewer exposure, the overall level of visual sensitivity of this view should be reduced to moderate.
D.18-19	Viewer Concern. High. Although energy transmission infrastructure features prominently in the foreground landscape when viewed from the community center, visitors to the community center would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, and Mount San Jacinto) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #12, the Proposed Project incorporates the use of TSP structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

D.18-20	Viewer Concern. High. Although energy transmission infrastructure features prominently in the landscape visible within this community, residential viewers would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, or Mount San Jacinto if viewing to the south) an adverse visual change.	The environmental setting recognizes that energy transmission infrastructure dominates the foreground views from a variety of locations, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #13, the Proposed Project incorporates the use of lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain and for residences in this location are generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.
D.18-21	Viewer Concern. High. Although energy transmission infrastructure features prominently in the western San Gorgonio Pass landscape visible from the PCT and parking lot, trail users would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, or Mount San Jacinto) an adverse visual change.	The environmental setting fails to recognize the significance distance of energy transmission infrastructure from the current view. The text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #14, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.
D.18-22	Viewer Concern. High. Travelers on Whitewater Canyon Road, including residents from the nearby residential enclave of Bonnie Bell, would consider any increase in industrial character or built structural prominence in the canyon, or view blockage of the background sky and Mount San Jacinto an adverse visual change.	The environmental setting does not recognize that energy transmission infrastructure and wind generation facilities dominate the foreground views from a variety of locations. The text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #15, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.

D.18-23	Viewer Concern. High. Residential viewers in this portion of Whitewater would consider any increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky, ridges, and Mount San Jacinto) an adverse visual change.	The environmental setting does not recognize that energy transmission infrastructure and wind generation facilities dominate the foreground views from a variety of locations. The text subjectively states that , "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #16, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider that "any" change as an adverse visual change should be removed from the environmental setting.
D.18-23	Viewer Concern. High. SR 62 is an Officially Designated State Scenic Highway and, therefore, warrants a high rating for viewer concern. Although travelers on this stretch of SR 62 would not likely notice the change in conductors and structure configurations that would occur from the Proposed Project, given the existing structural context, any perceived increase in industrial character, structure prominence, or view blockage would be experienced as an adverse visual impact.	The environmental setting recognizes that energy transmission infrastructure changes would not likely be perceptible, however, the text subjectively states, "…any increase in industrial character, structure prominence or view blockage of higher value landscape," would result in an adverse visual change. As seen in the KOP #17, the Proposed Project incorporates the use lattice steel structures. Although these structures are taller, the industrial character would remain generally the same, the structure prominence is generally the same and the view towards the mountain is generally the same. The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change as an adverse visual change should be removed from the environmental setting.
D.18-24	Viewer Concern. High. Travelers on Iowa Street and adjacent residents would consider the introduction of prominent energy infrastructure with its associated industrial character and view blockage of higher value landscape features (background sky and mountains) an adverse visual change.	The environmental setting is not the proper location to put forth subjectivity about adverse visual change. Further, as presented, the document fails to demonstrate or describe with supporting evidence that a viewer would consider "any" increase in industrial character, structure prominence, or view blockage of higher value landscape features (background sky or ridgelines) an adverse visual change for this location. The analysis needs to be updated with supporting documentation, and the subjective conclusion that viewers would consider "any" change an adverse visual change should be removed from the environmental setting. Please see the suggested revision below: Viewer Concern. High. Travelers on Iowa Street currently see utility infrastructure as seen in KOP #18.~~and adjacent vresidents would consider the introduction of prominent energy infrastructure with its associated industrial character and view blockage of higher value landscape features (background sky and mountains) an adverse visual change~~.

D.18-33	**VR-1a Screen construction activities from view.** Construction yards, staging areas, and material and equipment storage areas, including storage sites for excavated materials, shall be visu-ally screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facil-ities to the CPUC and BLM for review and approval at least 60 days prior to the start of construction at that site.	Mitigation Measure VR-1a is unnecessarily restrictive; please make the following revisions: **VR-1a Screen construction activities from view.** Construction yards, staging areas, and material and equipment storage areas, ~~including storage sites for excavated materials,~~ shall be visu-ally screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facil-ities to the CPUC and BLM for review and approval at least ~~60~~ 7 days prior to the start of construction at that site.
D.18-34	**VR-2a Minimize vegetation removal and ground disturbance.** Only the minimum amount of vege-tation necessary for the construction of structures and facilities shall be removed during construction. In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.	The project as designed depicts the maximum amount of disturbance necessary for construction. Ultimately SCE's disturbance areas will be limited to the sufficient areas needed to feasibly construct the proposed project in a safe and efficient manner. As such please make the following revisions: **VR-2a Minimize vegetation removal and ground disturbance.** Only the minimum amount of vege-tation necessary for the construction of structures and facilities shall be removed during construction. ~~In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.~~

D.18-34	**VR-2a Limit ground disturbance in Segments 2, 3, and 6.** Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas. Parking areas and staging and disposal site locations shall be similarly located in areas approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.	Mitigation Measure VR-2a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some areas of potentially significant impacts within Segments 2, 3 and 6 does not justify a post-approval consultation for the entirety of Segments 2, 3, and 6. Under Mitigation Measure VR-2a, the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist will consult on staking to *all* staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils to minimize the visibility of ground disturbance. Mitigation Measure VR-2a also gives the "CPUC/BLM Visual Specialist and Designated Project Biologist" discretion to require changes in project design, which could cause delays and implicate other engineering and environmental topic areas. CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. *See* CEQA Guidelines § 15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. *See* CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. *See Rialto Citizens For Responsible Growth v. Wla-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012).As such, please make the following revisions: **VR-2a Minimize vegetation removal and ground disturbance.** **Limit ground disturbance in Segments 2, 3, and 6.** Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define the limits of the Proposed Project disturbance areas ~~staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils~~. ~~Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual Specialist~~. ~~Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas.~~ Parking areas and staging and disposal site locations shall be similarly located in approved areas. ~~approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.~~
D.18-35	***Mitigation Measure for Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces*** **VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces.** Where construc-tion would unavoidably create land scars or retaining walls visible from sensitive public view-ing locations, disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar). The material shall be approved by the CPUC and BLM, and the intent shall be to reduce the visual contrast created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.	Application of treatments for temporary areas (disturbed soils) creates artificial blending that is less desirable at the expense of eventual natural blending. Land scars would only remain in areas used permanently and these areas are inappropriate for treatment. The mitigation measure as written is excessive. Additionally, between the PEA and SCE's responses to data requests, there is ample information about the project's ground disturbance and retaining walls to determine which specific locations may cause significant impacts to visual resources. In other words, the DEIR/DEIS must identify *which specific* retaining walls or grading areas will result in a potentially significant impact, not just those visible from sensitive public viewing locations, especially as sensitive viewing locations are not defined in the DEIR/DEIS. The document should not simply conclude that such activities could generically cause potentially significant impacts across the entirety of the Project. SCE believes there are few, if any, areas within where construction ground disturbance and retaining will result in a potentially significant visual impacts requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established ROW with existing transmission line infrastructure, substantially reducing the potential for significant visual impacts. The PEA concludes that construction activities would not result in significant impacts to visual resources because

		construction activities are temporary and the proposed project includes restoration of laydown/work areas through re-contouring and revegetation at the end of construction.[1] Second, Mitigation Measure VR-3a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some areas of potentially significant impacts does not justify a post-approval analysis for the entirety of Proposed Project. Under Mitigation Measure VR-3a, SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants, implying discretion or future analysis would be required. CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. *See* CEQA Guidelines § 15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. *See* CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. *See Rialto Citizens For Responsible Growth v. Wla-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012). as such, please make the following revisions: ***Mitigation Measure for Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces*** **VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces.** Where construc-tion would ~~unavoidably~~ create ~~land scars or~~ retaining walls that have been identified as creating a significant visual impact ~~visible from sensitive public view-ing locations, disturbed soils and~~ new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar) with the intent to reduce the visual contrast. ~~created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.~~
D.18-35	**VR-4a Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent view-ing characteristics. This analysis shall be subsequently provided to SCE for response and final design. In response, SCE shall develop design options to reduce the in-line visibility of these compo-nents, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:	Impact VR-4 indicates that, within Segments 2,3, 4 and 6, construction of the Proposed Project on hilltops and hillsides may "create extended, in-line view of newly graded terrain" which "can exacerbate the visibility, prominence, and overall visible contrast of graded surfaces such that the overall level of visual change becomes Moderate to High."[2] The DEIR/DEIS identifies this as a potentially significant impact that can be reduced to less than significance with the imposition of mitigation.[3] To address this impact, Mitigation Measure VR-4a requires SCE to submit a "map book and description of **all** access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6" (emphasis added), which will be analyzed by the CPUC's Visual Specialist "to assess in-line visibility of these Proposed Project features" from undefined "sensitive viewing locations." In response to the Visual Specialist's analysis, SCE shall "develop design options to reduce the in-line visibility of these components," after which, the "CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs." SCE has three primary concerns with Mitigation Measure VR-4a, discussed next. Based on these comments, SCE proposes changes to the measure in redline format, provided below.

[1] *Id*.
[2] Draft EIR/EIS, p. D.18-35.
[3] Draft EIR/EIS, p. D.18-60.

	□□Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads. □□Vegetation that would be affected and steepness of terrain for consideration of vegeta-tion and erosion impacts. □□Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehi-cle types to be used, and likelihood of vegetation recovery. □□The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.	First, the scope of impact conclusion is far too broad because the Draft EIR/EIS does not address *where* potentially significant impacts from spur roads, retaining walls, and ground disturbance will occur within Segments 2, 3, 4 and 6. CEQA requires an EIR to evaluate and conclude whether specific activities are significant, not simply reach generalized findings. *See Laurel Heights Improvement Ass' v. Regents of Univ. of Cal.*, 47 Cal. 3d 376, 404 (1988). An EIR cannot merely label an impact significant without first providing a detailed discussion and analysis supporting the specific impact conclusion. *See Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs*, 91 Cal. App. 4th 1344, 1370 (2001). Between the PEA and SCE's responses to data requests, there is ample information about the project's ground disturbance, retaining walls and spur roads to determine which specific construction activities and locations may cause significant impacts to visual resources. In other words, the EIR/EIS must identify *which specific* spur roads, retaining walls or grading areas will result in a potentially significant impact, and not simply conclude that such activities could generically cause potentially significant impacts across the entirety of Segments 2, 3, 4 and 6. Once the scope of the impact is identified, Mitigation Measure VR-4a can be properly tailored to address the specific impact areas (see comment below). SCE believes there are few, if any, areas within Segments 2, 3, 4 and 6 where construction ground disturbance, retaining walls and spur roads will result in a potentially significant visual impacts requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established ROW with existing transmission line infrastructure, substantially reducing the potential for significant visual impacts. The PEA concludes that construction activities would not result in significant impacts to visual resources because construction activities are temporary and the proposed project includes restoration of laydown/work areas through re-contouring and revegetation at the end of construction.[4] Second, Mitigation Measure VR-4a improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some areas of potentially significant impacts within Segments 2, 3, 4 and 6 does not justify a post-approval analysis for the entirety of Segments 2, 3, 4 and 6. Under Mitigation Measure VR-4a, the "Visual Specialist" will analyze impacts to *all* access and spur roads, retaining walls, and ground disturbance areas in Segments 2, 3, 4 and 6 to determine the potential for impacts. Mitigation Measure VR-4a also gives the "CPUC/BLM Visual Specialist and Designated Project Biologist" discretion to require changes in project design, which could cause delays and implicate other engineering and environmental topic areas. CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. *See* CEQA Guidelines § 15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. *See* CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. *See Rialto Citizens For Responsible Growth v. Wla-Mart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012). While some impact determinations require post-approval analysis, that is not the case here. The information requested in Mitigation Measure VR-4a has already been provided by SCE, supporting an analysis in the Draft EIR/EIS, consistent with CEQA and NEPA. To the extent that some additional analysis is required, it should be limited to specific areas where: (1) the EIR identifies a potentially significant impact, not the entirety of the Segment 2, 3, 4 and 6 (see prior comment); and (2) the final design is materially different from the design that SCE has already provided.

[4] *Id*.

		Third, to the extent that SCE must incorporate additional design features to mitigate potentially significant impacts from ground disturbance, retaining walls or spur roads, the options should be clearly identified in Mitigation Measure VR-4a. *See* CEQA Guidelines § 15126.4(a)(1)(B). Accordingly, based on the reasons provided above Mitigation Measure VR-4a should be removed from the DEIR/DEIS. ~~**VR-4a Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent view-ing characteristics. This analysis shall be subsequently provided to SCE for response and final design.~~ ~~In response, SCE shall develop design options to reduce the in-line visibility of these compo-nents, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:~~ ~~□□Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads.~~ ~~□□Vegetation that would be affected and steepness of terrain for consideration of vegeta-tion and erosion impacts.~~ ~~□□Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehi-cle types to be used, and likelihood of vegetation recovery.~~ ~~□□The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.~~
D.18-36	**VR-5a Prohibit construction marking of natural features.** SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose.	The following clarifying information is recommended: **VR-5a: Prohibit construction marking of natural features.** SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose. <u>This measure does not apply to temporary marking agents used to identify underground utilities.</u>
D.18-45	**General Comment identifying issues associated with CPUC Preferred Alternative** From the analysis of impacts on KOP 8- Stargazer Street in the Estates Residential Development in the City of Beaumont The impact would be substantial for about 10 percent of south-side residences: those that would be located adjacent to a proposed new structure pair. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects along this portion of the Proposed Project. In addition, the Tower Relocation Alternative defined in Section C and Appendix 5, would require specific structure pairs with the most severe visual impacts to be moved farther from residences, reducing the severity of the visual impact. The effects of this alternative are presented in Section D.18.4.1.	These findings vary substantially from the findings that were based on a review of the existing and simulated with-project views from KOP 8, seen in Figures D.18-15A and D.18-15B. There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts.

D.18-46	**General Comment identifying issues associated with CPUC Preferred Alternative** From the analysis of impacts on KOP 9- Cedar Hollow Road in the City of Beaumont: The visual effects would be substantial for approximately 10 percent of south side residences — those located adjacent to a proposed new structure pair. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects along this portion of the Proposed Project. In addition, the Tower Relocation Alternative defined in Section C and Appendix 5, would require specific structure pairs with the most severe visual impacts to be moved farther from residences, reducing the severity of the visual impact. The effects of this alternative are presented in Section D.18.4.1.	These findings vary substantially from the findings that were based on a review of the existing and simulated with-project views from KOP 7 seen in Figures D.18-16A and D.18-16B. There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts.
D.18-47	**General Comment identifying issues associated with CPUC Preferred Alternative** From the analysis of impacts on KOP 11- Hathaway Street in the City of Banning Figure D.18-18B presents a visual simulation of two new transmission lines that would be introduced into an area absent such features but with existing wood-pole utility lines present in the foreground of views. Given the relatively unobstructed viewing opportunities of the transmission line corridor and the mountains beyond, travelers on Hathaway Street and adjacent residents would be afforded Extended viewing durations of the Proposed Project. Also, given the close proximity and relatively large scale of the transmission lines, atmospheric conditions would have minimal effect on the viewing experience. As shown in the simulation, two double-circuit TSP transmission lines would be introduced into a fore-ground landscape presently absent similar features. The TSPs would appear as visually prominent, vertical structures that would result in Moderate to High visual contrast. The TSPs would appear Co-dominant in scale with the more distant background mountains. View blockage of the background sky, hills, and mountains would be Moderate to High. The overall visual change would be Moderate to High, and in the context of the existing landscape's Moderate to High visual sensitivity, the resulting visual effect would be substantial. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are recommended to reduce the visual effects. These severe visual effects could be reduced if the proposed new structures were located about 500 feet farther east. However, as described in Appendix 5, Section 5.7, the structures are located on Morongo Tribal Lands, and the Morongo Band of Mission Indians is not willing to consider this relocation, so an alternative that would reduce the severity of this impact is not feasible.	The finding of a significant and unmitagable visual impact on this view is not supported by the evidence. Based on a comparison of the simulation with the existing condition view, it is clear that the level of visual change has been overestimated. The proposed transmission structures are declared to be "co-dominant" in relationship to the scale of the mountains in the backdrop. Given the fact that the mountains are higher and more massive in scale than the proposed trim transmission structures, it would be more accurate to characterize the structures as being subordinate in relationship to the mountains. View blockage has been incorrectly classified as "moderate to high". Given the slim profiles of the transmission structures, their actual blockage of views toward landscape elements behind them is quite small, resulting in a level of view blockage that would be more accurately classified as "low" as opposed to "moderate to high". Taking the visually subordinate character of the structures and the low level of view blockage into account, the overall level of visual change would be more correctly determined to be "moderate" than "moderate to high'. As indicated in the comments made related to text on pages D.18-18 and D.18-19, the correct assessment of the sensitivity of this view is moderate, rather than moderate to high. Given the moderate level of visual sensitivity and the overall moderate level of visual change, applying the assumptions indicated in Table D.18-9, the level of impact would be less than significant.

D.18-52 and Figure D.18-25B	**KOP 18 – Northbound Iowa Street in the City of Redlands.** Figure D.18-25A presents a life-size scale view to the north along the Iowa Street, near the southwest corner of the Cottage Lane residential sub-division, south of Orange Avenue and North of Barton Road in the City of Redlands. The view encom-passes a portion of the Proposed Project SB-Redlands-Tennessee overhead 66 kV subtransmission line as it passes immediately west of the Cottage Lane residential subdivision. There are no other substantial overhead utility structures apparent in the suburban landscape along this portion of Iowa Street. Figure D.18-25B presents a simulation of a new 66 kV subtransmission line in this suburban neighborhood. As shown in the simulation, the Proposed Project would result in the introduction of a light-weight, steel-pole, 66 kV subtransmission line into a residential suburban landscape presently absent similar fea-tures. The light-weight steel poles would appear as visually prominent, vertical structures along the east side of Iowa Street adjacent to the Cottage Lane residential subdivision. The resulting visual contrast would be Moderate to High, and the light-weight steel poles would appear Co-dominant in scale with the more distant background mountains. View blockage of the mountains and sky would be Moderate to High	Figure D-18-25B improperly simulates the installation of double-circuit 220kV TSPs (with a typical as shown in Figure B-10), instead of the correct use of single-circuit 66kV wood poles (with typical as shown in Figure B-14b). If this simulation had incorporated the correct structure type, it would show that the Proposed Project creates a similar visual impact as the "single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street" and the "…vertical street light poles and a more distant communication tower." (See DEIR page D.18-24, KOP-18, Visual Quality.) The DEIR language should be revised as follows: **KOP 18 – Northbound Iowa Street in the City of Redlands.** Figure D.18-25A presents a life-size scale view to the north along the Iowa Street, near the southwest corner of the Cottage Lane residential sub-division, south of Orange Avenue and North of Barton Road in the City of Redlands. The view encom-passes a portion of the Proposed Project SB-Redlands-Tennessee overhead 66 kV subtransmission line as it passes immediately west of the Cottage Lane residential subdivision. There are no other substantial overhead utility structures apparent in the suburban landscape along this portion of Iowa Street, though there are some single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street, as well as some vertical street light poles and a more distant communication tower. Figure D.18-25B presents a simulation of a new 66 kV subtransmission line in this suburban neighborhood. As shown in the simulation, the Proposed Project would result in the introduction of a ~~light-weight, steel~~wood-pole, 66 kV subtransmission line into a residential suburban landscape ~~presently absent similar fea-tures~~. The ~~light-weight steel~~ wood poles would appear as visually prominent, vertical structures along the east side of Iowa Street adjacent to the Cottage Lane residential subdivision. The resulting visual contrast would be Low to Moderate ~~to High~~, and ~~the light-weight steel poles would~~ could appear Co-dominant in scale with the more distant background mountains. View blockage of the mountains and sky would be Low to Moderate ~~to High~~

D.18-54

Mitigation Measure for Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality

VR-8a Minimize visual contrast in project design. In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduc-tion of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.

□□**Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.

□□**Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.

□□**Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmis-sion line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.

A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-pare and submit for review and approval a revised plan.

The Draft EIR/EIS Impact VR-8 analyzes whether the long-term presence of the project would result in landscape changes that degrade the existing visual character or quality. CEQA requires evaluating a project against the existing environmental setting (i.e., the baseline). Here, the project will be developed almost entirely within previously disturbed areas or established rights-of-way with existing transmission line infrastructure. Given the highly disturbed nature of the existing setting, the incremental visual changes from the project are relatively minor or even beneficial. As such, the PEA concluded the project would not significantly degrade the visual character or quality of the surrounding area.[5]

The Draft EIR also concludes that the large majority of the project along 48 corridor miles would either result in a *beneficial* impact or a less than significant impact. Significant impacts were limited to the following locations:[6]

- Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane.
- Segment 5 when viewed from residences on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning.
- Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the community of Whitewater.
- The Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands.

Appendix 10 of the Draft EIR, Table AP.10-1, summarized next, illustrates that significant operational impacts were limited in scope compared to the rest of the project (locations with a significant visual impact are bolded):

KOP	CEQA Impact Significance Determination
KOP 1 – Right-of-Way Crossing of Mission Road in Loma Linda	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 2 – Canyon Vista Dr. and East Chase Canyon Lane in Colton	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 3 –Pilgrim Road in San Timoteo Canyon	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 4 – Westbound San Timoteo Canyon Road	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 5 – Boros Boulevard – Tukwet Canyon	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 6 – Stetson Community Park in the City of Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) **Some Views South of ROW: Significant (Class I)**
KOP 7 – Oak Valley Golf Course	North of, Within, & Most Views South of ROW: Beneficial (Class IV)

[5] Proponent's Environmental Assessment, p. 4.1-38.

[6] Draft EIR, p. D.18-61.

	Some Views South of ROW: Less than Significant (Class III) **Some Views South of ROW: Significant (Class I)**
KOP 8 – Stargazer St. and Rose Ave. in The Estates Residential Development in the City of Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) **Some Views South of ROW: Significant (Class I)**
KOP 9 – Cedar Hollow Road in Beaumont	North of, Within, & Most Views South of ROW: Beneficial (Class IV) Some Views South of ROW: Less than Significant (Class III) **Some Views South of ROW: Significant (Class I)**
KOP 10 – Bluff Street in Banning	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 11 – Hathaway Street in Banning	**BEFORE: Significant and Unmitigable (Class I)** **AFTER: Same**
KOP 12 – Morongo Community Center	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 13 – Haugen-Lehmann Way in the Central Portion of the Community of Whitewater	BEFORE: Beneficial (Class IV) AFTER: Same
KOP 14 – Pacific Crest Trail Trailhead / Parking Lot	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 15 – Whitewater Canyon Road, South of Bonnie Bell	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 16 – Painted Hills Road in the Community of Whitewater	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 17 – Southbound State Route 62 Scenic Hwy.	BEFORE: Less than Significant (Class III) AFTER: Same
KOP 18 – Northbound Iowa Street in the City of Redlands	**BEFORE: Significant and Unmitigable (Class I)** **AFTER: Same**

Under CEQA, "[m]itigation measures are not required for effects which are not found to be significant." CEQA Guidelines § 15126.4(a)(3); *see also San Franciscans for Reasonable Growth v. City & County of San Francisco*, 209 Cal. App. 3d 1502, 1517 (1989) (an exaction for open space and parks not required because the EIR concluded impacts requiring such mitigation were not significant); *North Coast Rivers Alliance v. Marin Mun. Water Distr.* 216 Cal. App. 4th 614, 649 (2013) (mitigation for energy impacts not needed where EIR determined the project's energy impacts would not be significant).

When mitigation is imposed, CEQA requires that the lead agency limit the scope of the mitigation to match the nature of the impact. CEQA Guidelines § 15126.4(a)(4) requires:

There must be an essential nexus (i.e. connection) between the mitigation measure and a legitimate governmental interest. *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987); and

The mitigation measure must be "roughly proportional" to the impacts of the project. *Dolan v. City of Tigard*, 512 U.S. 374 (1994).

In contrast to the clear limits imposed by CEQA, the Draft EIR/EIS applies Mitigation Measures VR-8a ***across the entirety of the project***, not just the locations where a significant visual impact would occur. The Draft EIR recommends that Measures VR-8a apply to sections with a less than significant impact to "further reduce the adverse visual effects," and to sections with beneficial impacts to "further ensure that the resulting impacts are an improvement and are, in fact, beneficial."[7]

Simply put, this approach is not consistent with CEQA. Mitigation measures should only be applied to reduce significant environmental impacts, not to "further reduce" less than significant impacts or to ensure that beneficial impacts occur. As proposed, Mitigation Measures VR-8a would impose substantial costs and effort on SCE that are not connected to or roughly proportional to the limited nature of the impact. The measures effectively require the entirety of the project to be reevaluated for visual effects based on the criteria in Mitigation Measures VR-8a even though the vast majority of project components would not result in a significant environmental impact.

As discussed in the PEA, SCE will reduce visual impacts across the entirety of the project by applying design features intended to reduce visual effects, including revegetation, recontouring, use of appropriate materials, light shielding, and glare reduction as appropriate. However, except for the limited locations identified in the Draft EIR/EIS where significant visual impacts will occur, no additional mitigation is permitted under CEQA. As such, SCE respectfully proposes mitigation measure Vr-8a be removed from the DEIR/DEIS.

~~***Mitigation Measure for Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality***~~
~~**VR-8a Minimize visual contrast in project design.** In the final design of approved project struc-tures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduc-tion of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.~~
~~□□**Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.~~

~~□□**Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.~~

~~□□**Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmis-sion line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.~~

		~~A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-pare and submit for review and approval a revised plan.~~

[7] Draft EIR, p. D.18-61.

D.18-55	***Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare*** **VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The trans-mission structures and conductors shall be non-specular and non-reflective, and the insu-lators shall be non-reflective and non-refractive. SCE shall consider the use of special gal-vanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-posed Project elements. SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and con-trast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.	The analysis related to mitigation measure VR-9, states the following: Steel Structure Glare and Reflectivity. Components of new steel transmission structures can be reflective and highly visible in sunlight, even creating distractions to motorists and nearby residents. Therefore, the long-term presence of the Proposed Project could create a new source of reflective glare and surface color contrast that could adversely affect daytime views along much of the Proposed Project route. However, the visibility and reflectivity of new structures can be minimized with various surface treatments. Mitigation Measure VR-9a (Treat structure surfaces) is recommended to minimize the views of these facilities. That analysis fails to recognize that there are existing steel transmission structures within the same corridor as the new structures and there would be no new source of reflective glare and surface color contrast. As noted in the PEA[8], new structures and conductors would weather to a dull gray finish. Thus, colors would be consistent with the existing visual condition and approval of specific colors for towers and conductors is unnecessary. Furthermore for the same reasoning explained for measure VR-8 (mitigation not required for impacts not found to be significant, scope of mitigation to match nature of the impact), mitigation measure VR-9 should be removed from the DEIR/DEIS ~~***Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare***~~ ~~**VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The trans-mission structures and conductors shall be non-specular and non-reflective, and the insu-lators shall be non-reflective and non-refractive. SCE shall consider the use of special gal-vanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-posed Project elements.~~ ~~SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and con-trast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.~~
D.18-59	***Impact VR-1C: Construction would result in adverse visual effects due to the presence of equipment, vehicles, materials, and workforce, or use of night lighting (Class II)*** **[For connected actions]** Construction of the connected actions would cause temporary visual contrast and degradation of the construction sites and yards, staging areas, and surrounding landscapes due to the presence of equipment, vehicles, materials, workforce, and potentially, night lighting. Due to the relatively short-term nature of this impact, these construction characteristics would be consistent with the BLM VRM	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

[8] Proponent's Environmental Assessment, p. 4.1-39.

	Class Manage-ment Objectives. The overall visual impact would be adverse due to the substantial visual contrast associated with the construction activities; however, with implementation of Mitigation Measures VR-1a (Screen construction activities from view) and VR-7a (Minimize night lighting at project facilities), this impact would be less than significant (Class II).	
D.18-61	**General Comment identifying issues associated with CPUC Preferred Alternative** ***Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Class I, III, or IV depending on location)*** The long-term presence of the Proposed Project would result in various levels of perceived landscape changes ranging from Significant and Unmitigable (Class I) to Less Than Significant (Class III) to Beneficial (Class IV), depending on the location: □ ***Significant and Unmitigable*** **(Class I)** visual impacts would occur for the Proposed Project in the fol-lowing locations: (a) Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane. (b) Segment 5 when viewed from residences on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning. (c) Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the community of Whitewater. (d) The Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands. In all cases, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are required to reduce the severity of adverse visual impacts, though they would remain significant. These impacts would be less than significant with implementation of the Tower Relocation Alternative and the Iowa Street 66 kV Underground Alternative, as discussed in Sections D.18.4.1 and D.18.4.2, respectively.	No tangible evidence has been presented in the analysis to support the conclusions that have been made regarding the significant and unmitigable impacts labeled a, b, and c.
D.18-61 through 62	***Impact VR-8C: Long-term presence of the project would result in landscape changes or new sources of light and glare that degrade existing visual character or quality (Class I or III depending on location)*** **[For connected actions]** For connected actions, their long-term presence would result in various levels of perceived landscape changes ranging from Significant and Unmitigable (Class I) to Less Than Significant (Class III), depending on location…. In all cases, Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) are required to reduce the severity of adverse visual impacts, though they would remain significant… Because NEPA requires implementation of feasible mitigation for impacts regardless of severity, Miti-gation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure sur-faces) would further reduce the adverse visual effects.	The DEIR should clarify that the potential mitigation measures referenced for connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.18-68	D.18.4.3 Phased Build Alternative	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional

through 69	Impact VR-1: Construction would result in adverse visual effects due to the presence of equipment, vehicles, materials, and workforce Impact VR-2: Construction would result in visual contrast due to vegetation removal Impact VR-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces Impact VR-4: Construction could result in visual contrast associated with in-line views of retaining walls and land scars Impact VR-5: Construction could result in visual contrast associated with the marking of natural features Impact VR-6: Construction could result in visual contrast associated with fugitive dust, waste, and trash Impact VR-7: Construction could result in the use of night lighting or installation of reflective surfaces, which could cause undesirable night light and glare effects	visual impact analysis. The additional disturbance areas and the increased duration could result in additional visual impacts beyond those analyzed for the Phased Build Alternative in the document and could be greater than those identified for the Proposed Project.
D.18-70	***Impact VR-6: Construction could result in visual contrast associated with fugitive dust, waste, and trash*** Grading activities for the construction of specific sites, access roads, and spur roads have the potential to generate dust clouds, creating visual contrast that can substantially degrade the quality of a site. Implementation of Mitigation Measure AQ-1a (Control fugitive dust; see Section D.3, Air Quality) can reduce this impact. Also, during construction, there is the potential for trash and food-related waste to be discarded inappropriately at construction sites and then be transported by wind and/or animals across the landscape, resulting in additional visual contrast and degradation of landscape quality and character… However, these adverse effects would be less severe than in the Proposed Project because the existing double-circuit structures would be retained and reconductored rather than replaced.	The Phased Build Alternative actually results in greater environmental impacts than the Proposed Project because it will force multiple rounds of construction activities, possibly in short succession, prolonging the duration of noise and air pollutant exposure while increasing land disturbance and associated impacts. Please see additional comments provided in SCE's cover letter.
D.18-71	**General Comment identifying issues associated with CPUC Preferred Alternative** ***Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality*** The Phased Build Alternative would result in permanent adverse effects related to visual change perceived from sensitive viewing locations including adjacent residences, local roadways, and nearby recreation areas and facilities. The perceived visual change would be associated with new towers, conductors, and FAA hazard markers. The permanent visual changes in this alternative would be substantially reduced due to the retention of the existing set of double-circuit towers. For some portions of the Proposed Project, the structures and/or conductors would appear immediately adjacent to residential property lines. As a result, the increased visual contrast, structure prominence, and view blockage associated with the close proximity of the structure pairs would result in a Moderate to High degree of visual change, which would constitute a substantial visual effect under the Proposed Project. In contrast, the Phased Build Alternative would produce a less severe visual impact (compared to the Proposed Project) by retaining the set of existing double-circuit structures near the center of the ROW and constructing one new set of double-circuit structures that generally would be farther from the edge of the ROW (and in all cases no closer to the edge of the ROW) than the comparable Proposed Project	No tangible evidence is provided to support the assertions that the Phased Build Alternative would produce a less severe visual impact than the proposed project.

	structures. By shifting structures farther away from the closest residences, the Phased Build Alternative would achieve structure placements within the ROW that would appear more similar to the existing structure locations. As a result, the Phased Build Alternative would cause less incremental visual contrast, structure prominence, and view blockage compared to the Proposed Project when viewed from residential locations along the south side of the ROW. From the most adversely affected residences (those closest to a structure pair), the resulting incremental visual change (from the present condition) would be Moderate and the overall visual effect would be less than substantial. Mitigation Measures VR-8a (Minimize visual contrast in project design) and VR-9a (Treat structure surfaces) as described in Section D.18.3.3 above, are recommended to reduce the visual effects of the Phased Build Alternative.	
D.18-71	***Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Class I)*** Under the Proposed Project, the long-term presence of the project would result in significant (Class I) visual impacts in Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane, and in Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the Community of Whitewater. Under the Tower Relocation Alternative, these Class I visual impacts would be reduced to less than significant levels by moving the towers farther to the north away from the residences. However, the significant (Class I) visual impact in Segment 5 on Morongo Tribal Lands (when viewed from North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning) would remain Significant as the Morongo Band of Mission Indians opted not to consider tower relocation.	No tangible evidence is provided to support the assertions that the Phased Build Alternative would produce a less severe visual impact than the proposed project. The comments related to the text on page D.18-47 make it clear that the reference to significant impacts on Morongo lands as viewed from Hathaway Street must be deleted because the impacts on this view would be less than significant.
D.18-75	**VR-1a: Screen construction activities from view.** Construction yards, staging areas, and material and equipment storage areas, including storage sites for excavated materials, shall be visually screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facilities to the CPUC and BLM for review and approval at least 60 days prior to the start of construction at that site.	Mitigation Measure VR-1a is unnecessarily restrictive; please make the following revisions: **VR-1a Screen construction activities from view.** Construction yards, staging areas, and material and equipment storage areas, ~~including storage sites for excavated materials,~~ shall be visu-ally screened using temporary screening fencing. Fencing will be of an appropriate structure, material, and color for each specific location. This requirement shall not apply if SCE can demonstrate that construction yards are located away from areas of high public visibility including public roads, residential areas, and public recreational facilities. For any site that SCE proposes to exempt from the screening requirement, SCE shall define the site on a detailed map demonstrating its visibility from nearby roads, residences, or recreational facil-ities to the CPUC and BLM for review and approval at least ~~60~~ 7 days prior to the start of construction at that site.
D.18-76	**VR-2a: Minimize vegetation removal and ground disturbance.** Only the minimum amount of vegetation necessary for the construction of structures and facilities shall be removed during construction. In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with require-ments of CPUC General Order 95 and other regulatory requirements. **Limit ground disturbance in Segments 2, 3, and 6.** Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or Visual	For the reasons noted previously, please make the following revisions: **VR-2a Minimize vegetation removal and ground disturbance.** Only the minimum amount of vege-tation necessary for the construction of structures and facilities shall be removed during construction. ~~In particular, vegetation within the ROW and ground clearing at the foot of each tower and between towers shall be limited to the clearing necessary to comply with requirements of CPUC General Order 95 and other regulatory requirements.~~ **Limit ground disturbance in Segments 2, 3, and 6.** Within these segments, structure and access road scars may be highly visible when located on hill slopes and along ridges, or when visible from elevated vantage points. In order to reduce visual impacts, the boundaries of all areas to be disturbed shall be delineated consistent with the requirements of Biological Resources Mitigation Measure VEG-1c. Staking shall define the limits of the Proposed Project disturbance areas ~~staging areas, access roads, spur roads, tower locations, pulling sites, and sites for temporary placement of spoils. Stakes and flagging shall be installed before construction and in consultation with the Project Biologist and the CPUC/BLM Environmental Monitor or~~

	Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas. Parking areas and staging and disposal site locations shall be similarly located in areas approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.	~~Visual Specialist. Areas staked shall be as small as possible in order to minimize the visibility of ground disturbance from sensitive viewing locations such as roads, trails, residences, and recreation facilities and areas.~~ Parking areas and staging and disposal site locations shall be similarly located in approved areas. ~~approved by the Project Biologist and CPUC/BLM's Environmental Monitor or Visual Specialist prior to the start of construction. All disturbances by Proposed Project vehicles and equipment shall be confined to the staked and flagged areas.~~
D.18-76	**VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces.** Where construc-tion would unavoidably create land scars or retaining walls visible from sensitive public view-ing locations, disturbed soils and new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar). The material shall be approved by the CPUC and BLM, and the intent shall be to reduce the visual contrast created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.	For the reasons noted previously, please make the following revisions: **VR-3a Reduce color contrast of retaining walls, land scars, and graveled surfaces.** Where construc-tion would ~~unavoidably~~ create ~~land scars or~~ retaining walls that have been identified as creating a significant visual impact ~~visible from sensitive public view-ing locations, disturbed soils and~~ new walls shall be treated with an appropriate color or material (Natina Concentrate, Eonite, or Permeon, or similar) with the intent to reduce the visual contrast. ~~created by the lighter-colored disturbed soils and rock with the darker soil and vegetated surroundings. SCE shall consult with the CPUC and BLM and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.~~
D.18-77	**VR-4a: Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design. In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following: • Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads. • Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts. • Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery. The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.	For the reasons noted previously, please remove mitigation measure VR-4a from the DEIR/DEIS: ~~**VR-4a: Minimize in-line views of retaining walls and land scars.** Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6. The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC's Visual Specialist and Designated Project Biologist. The CPUC's Visual Specialist will evaluate all proposed access roads, spur roads, retaining walls, and ground disturbance areas within Segments 2, 3, 4, and 6 to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design. In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of "drive and crush" access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE's redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following: • Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads. • Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts. • Areas where "drive and crush" access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery. The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs.~~

D.18-77	**VR-5a: Prohibit construction marking of natural features.** SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose.	The following clarifications are recommended: **VR-5a: Prohibit construction marking of natural features.** SCE shall not apply paint or permanent discoloring agents to rocks or vegetation to indicate survey or construction activity limits or for any other purpose. <u>This measure does not apply to temporary marking agents used to identify underground utilities.</u>
D.18-79	**VR-8a: Minimize visual contrast in project design.** In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors. □□**Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills. □□**Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes. □□**Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmis-sion line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape. A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-pare and submit for review and approval a revised plan.	For the reasons noted previously, please remove mitigation measure VR-8a from the DEIR/DEIS: ~~**VR-8a: Minimize visual contrast in project design.** In the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.~~ ~~□□**Earthwork.** Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills.~~ ~~□□**Vegetation Manipulation.** Use existing vegetation to screen graded areas and facilities from public viewing to the extent feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.~~ ~~□□**Reclamation and Restoration.** Blend the disturbed areas into the characteristic landscape including access and spur roads and disturbed areas created during construction (transmis-sion line structures, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.~~ ~~A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall pre-pare and submit for review and approval a revised plan.~~

D.18-80	***Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare*** **VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The trans-mission structures and conductors shall be non-specular and non-reflective, and the insu-lators shall be non-reflective and non-refractive. SCE shall consider the use of special gal-vanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-posed Project elements. SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and con-trast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.	For the reasons noted previously, please remove mitigation measure VR-9 from the DEIR/DEIS: ~~***Mitigation Measure for Impact VR-9: Project operation would create a new source of reflected light and glare***~~ ~~**VR-9a Treat structure surfaces.** SCE shall treat the surfaces of all structures and new buildings visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The trans-mission structures and conductors shall be non-specular and non-reflective, and the insu-lators shall be non-reflective and non-refractive. SCE shall consider the use of special gal-vanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Pro-posed Project elements.~~ ~~SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and con-trast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft Surface Treatment Plan shall include the following components and specifications.~~
WATER RESOURCES AND HYDROLOGY		
D.19-15	Under the heading TMDL Program, the paragraph states: The California TMDL Program evaluates the condition of surface waters and sets limits on the amount of pollution that the water can be exposed to without adversely affecting the beneficial uses of those waters. The RWQCBs identify waters that are not attaining standards, and develop total maximum daily loads to account for all sources of the pollutants that caused the water to no attain standards. TMDL levels are established to achieve the applicable water quality standards. When the TMDL is established as a standard, a program must be designed to implement the TMDL. TMDLs developed by RWQCBs are Regional Basin Plan amendments and include implementation provisions.	Please make the following revisions: The California TMDL Program evaluates the condition of surface waters and sets limits on the amount of pollution that the water can be exposed to without adversely affecting the beneficial uses of those waters. The RWQCBs <u>are required to</u> identify waters ~~that are not attaining standards~~ <u>where beneficial uses are impaired, establish priority rankings for water segments on the lists, and develop action plans, or TMDLs, to improve water quality.</u> ~~and develop total maximum daily loads to account for all sources of the pollutants that caused the water to not~~ <u>t</u> attain standards. ~~TMDL levels are established to achieve the applicable water quality standards.~~ When the TMDL is established as a standard, a program must be designed to implement the TMDL. <u>As</u> TMDLs <u>are</u> developed <u>and established as a standard, they are added to the</u> ~~by RWQCBs are~~ <u>Water Quality Control Plan through</u> ~~Regional Basin Plan~~ amendments and include implementation provisions.

D.19-15	The Porter Cologne Water Quality Control Act of 1967, Water Code Section 13000 et seq., requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for the project area are contained in the Water Quality Control Plan for the Santa Ana River Basin (CRWQCB, 1995) and the Water Quality Control Plan Colorado River Basin – Region 7 (CRWQCB, 2005). Constraints in the water quality control plans relative to the Proposed Project relate primarily to the avoidance of altering the sediment discharge rate of surface waters, and the avoidance of introducing toxic pollutants to the water resource. A primary focus of water quality control plans is to protect designated beneficial uses of waters. In addition, anyone proposing to discharge waste that could affect the quality of the waters of the state must make a report of the waste discharge to the Regional Water Board or State Water Board as appropriate, in compliance with Porter-Cologne.	Please make the following revisions: The Porter Cologne Water Quality Control Act of 1967, Water Code Section 13000 et seq., requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for the project area are contained in the Water Quality Control Plan for the Santa Ana River Basin-Region 4 (CRWQCB, ~~1995~~2014) and the Water Quality Control Plan Colorado River Basin – Region 7 (CRWQCB, ~~2005~~2014). Constraints in the water quality control plans relative to the Proposed Project relate primarily to the avoidance of altering the sediment discharge rate of surface waters, and the avoidance of introducing toxic pollutants to the water resource. A primary focus of water quality control plans is to protect designated beneficial uses of waters. In addition, anyone proposing to discharge waste that could affect the quality of the waters of the state must make a report of the waste discharge to the Regional Water Quality Control Board or State Water Resources Control Board as appropriate, in compliance with Porter-Cologne.
D.19-20	Under the header *Impact WR-2* in the fifth paragraph it states: As described in Section B.3.1.2 (Section B, Project Description), SCE would develop and adhere to a SWPPP in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activity.	Please make the following revisions: As described in Section B.3.1.2 (Section B, Project Description), SCE would develop and adhere to ~~a~~ the SWPPPs in conformance with the California General Permit for Discharges of Storm Water Associated with Construction Activity~~ies~~ and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land .
D.19-20	Access roads would be constructed in watercourses, but none of the proposed structures would be located directly within major watercourses listed in Table D.19-1. APM HYDRO-1 requires maintaining the existing flow pattern where possible. Mitigation Measure WR-2a (Implement an Erosion Control Plan	Please make the following revisions: Major Streams and watercourses crossed by the project route are identified in Table D.19-1. Figures D.19-1a through D.19-1i (presented at the end of this section) show the locations of most watercourses on a topographic base map. Note, Table D.19-1 does not include all surface water features within the Proposed Project; SCE will prepare a Jurisdictional Delineation (JD) Report of the project's impact areas after completing final design (PEA, page 4.4-112) to identify and quantify all site-specific project impacts to jurisdictional waters. Access roads would be constructed in watercourses, ~~but none of the proposed~~ and some structures ~~would~~ may be located directly within major watercourses listed in Table D.19-1. APM HYDRO-1 requires maintaining the existing flow pattern where possible. Mitigation Measure WR-2a (Implement an Erosion Control Plan

D.19-21	**WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality per-mits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction. The Erosion Control Plan may be part of the same document as the Stormwater Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures. The Erosion Control Plan shall include: □ The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads □ The location of all streams and drainage structures that would be directly affected by soil-disturbing activities (such as stream crossings or public storm drains by the right-of-way and access roads) □ Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction). □ If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the Regional Water Quality Control Board shall be submitted to the CPUC and BLM prior to its use. □ If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars). □ The location and type of all BMPs that would be installed to prevent off-site sedimenta-tion and to protect aquatic resources. □ A proposed schedule for the implementation and maintenance of erosion control mea-sures and a description of the erosion control practices, including appropriate design and installation details.	The Erosion Control Plan will be incorporated into the Storm Water Pollution Prevention Plan, which will be written and implemented in compliance with the applicable Federal and California Construction General Permits for Storm Water. The SWPPP will be kept onsite and will be readily available on request. **WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality per-mits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM ~~for approval at least 60 days~~ prior to construction. The Erosion Control Plan may be part of the same document as the Storm ~~w~~Water Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion. ~~through revegetation or construction of permanent erosion control structures.~~ The Erosion Control Plan shall include: □ The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads □ BMPs will be included to protect drainage structures (such as public storm drains) down stream of soil disturbance activities. □ The location of all streams ~~and drainage structures~~ that would be directly affected by soil-disturbing activities (such as stream crossings ~~or public storm drains~~ by the right-of-way and access roads) □ Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction). □ If soil cement is proposed, the specific locations must be defined in the Plan~~,~~ and ~~evidence of approval by the Regional Water Quality Control Board~~ shall be submitted to the CPUC and BLM prior to its use. □ If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars). □ The location and type of ~~all~~ BMPs that would be installed to prevent off-site sedimenta-tion and to protect aquatic resources. □ ~~A proposed schedule for the~~ Specifications for implementation and maintenance of erosion control mea-sures and a description of the erosion control practices, including appropriate design and installation details. □ Proposed schedule for inspection of erosion control/SWPPP measures and schedule for corrective actions/repairs, if required. Erosion control/SWPPP inspection reports shall be kept in the SWPPP~~provided to the CPUC EM~~and be made available upon request.
D.19-21	Under the header WR-2a in the paragraph under the bulleted list it states: Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion. A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.	Please make the following revisions: Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion, and documented during inspections. Inspections and monitoring will be performed in compliance with the Federal and California Construction General Permits. ~~A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.~~ The inspection reports will be maintained and kept in their respective SWPPP and will be kept on site as required by the Federal and State Construction General Permits. Additionally, an Annual Report will be filed for each reporting period in compliance with both the Federal and California Construction General Permit reporting requirements.

D.19-21	Under the header WR-2a in the paragraph under the bulleted list it states: Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion. A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.	Please make the following revisions: Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion, and documented during inspections. Inspections and monitoring will be performed in compliance with the federal and California Construction General Permits. ~~A weekly report identifying the status of corrective actions/repairs shall be submitted to State and Regional Water Boards, and CPUC and BLM.~~ The inspection reports will be maintained and kept in their respective SWPPP and will be kept on site as required by the federal and State Construction General Permits. Additionally, an Annual Report will be filed for each reporting period in compliance with both the federal and California Construction General Permit reporting requirements.
D.19-21	Under the header WR-2a in the last paragraph it states: SCE shall submit to the CPUC and BLM evidence of possession of all required permits before engaging in soil-disturbing construction/demolition activities, before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water. Such permits may include, but are not limited to, a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a CWA Section 402 NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and/or a CWA Section 401 certification from the applicable RWQCBs.	Please make the following revisions: SCE shall submit to the CPUC and BLM evidence of possession of ~~all~~ applicable required permits for the representative land disturbance area prior to~~before~~ engaging in soil-disturbing construction/demolition activities. ~~before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water.~~ Such permits may include, but are not limited to, ~~a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a~~ Clean Water Act (CWA) Section 402 NPDES California General Permits for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs) and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land. ~~, and/or a CWA Section 401 certification from the applicable RWQCBs.~~ Prior to ground disturbance in waters (e.g., maintenance grading or constructing a crossing at flowing or ponded water, etc.), SCE will obtain a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a ~~Clean Water Act (~~CWA~~)~~ Section 404 permit from the USACE, and a CWA Section 401 certification from the SWRCB.
D.19-23	Onsite damages related to channel erosion and vertical scour during a flood could be prevented by design of footings and burial depth to account for erosion and scour. The final design analysis has not been completed, and it is not known at this time if footings and burial depths would take erosion and scour into account. Mitigation Measure WR-3a (Implement flood, erosion, and scour protection for aboveground and belowground improvements) is recommended in order to reduce the potential for damage and interruption of power and communication services due to erosion and scour. ***Mitigation Measure for Impact WR-3: The project would cause flood damage*** **WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improve-ments.** SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures and other above-ground features, as well as new underground conduits. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer. SCE shall provide the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan)).	SCE's standard engineering design practices incorporate analysis of potential scour impacts to determine foundation depth. Therefore, please make the following revisions: Onsite damages related to channel erosion and vertical scour during a flood could be prevented by design of footings and burial depth to account for erosion and scour. The final design analysis has not been completed, ~~and it is not known at this time~~ however, ~~if~~ footings and burial depths would take erosion and scour into account per SCE's standard engineering design practices. Mitigation Measure WR-3a (Implement flood, erosion, and scour protection for aboveground and belowground improvements) is recommended in order to reduce the potential for damage and interruption of power and communication services due to erosion and scour. ***Mitigation Measure for Impact WR-3: The project would cause flood damage*** **WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improve-ments.** SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures with a foundation ~~and other above-ground features~~, as well as new underground conduits located within mapped FEMA 100-year flood zone boundaries. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer. SCE shall provide appropriate documentation that indicates incorporation of scour depths into the foundation design. ~~the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan))~~.

D.19-24	Under the header WR-4 in the fourth paragraph it states: Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would require development of and adherence to erosion-control and hazardous mate-rial plans during construction. Development and adherence to an SWPPP in conformance with the Cali-fornia General Permit for Discharges of Storm Water Associated with Construction Activity, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards, would require best management practices to prevent and control erosion and siltation during construc-tion, prevent, contain and mitigate accidental spills during construction, and address treatment and dis-posal of any groundwater to prevent violation of water quality objectives or damaging beneficial uses. Compliance with Sections 401 and 404 of the Clean Water Act would also minimize this impact. Mitiga-tion Measure HH-2a (Prepare a hazardous materials and waste management plan), described in Section D.10 Hazards and Hazardous Materials, would further ensure against potential surface and groundwater contamination.	Please make the following revisions: Mitigation Measure WR-2a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits) would require development of and adherence to erosion control and hazardous material plans during construction. Development and adherence to ~~an~~the SWPPPs in conformance with the applicable (California or Federal) General Permit for Discharges of Storm Water Associated with Construction Activity~~ies, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards~~, would require best management practices to prevent and control erosion and siltation during construction, prevent, contain and mitigate accidental spills during construction, and address treatment (if required) and disposal of ~~any~~ dewatered groundwater to prevent violation of water quality objectives or damaging beneficial uses. Compliance with Sections 401 and 404 of the Clean Water Act would also minimize this impact. Mitigation Measure HH-2a (Prepare a hazardous materials and waste management plan), described in Section D.10 Hazards and Hazardous Materials, would further ensure against potential surface and groundwater contamination.
D.19-29 through 30	***Impact WR-2: The project would cause erosion and siltation (Class II)*** Construction and operation of the connected action projects would involve ground disturbance that would result in a significant impact related to accelerated erosion and sedimentation. With implementa-tion of mitigation to control erosion, this impact would be less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.19-30	***Impact WR-3: The project would cause flood damage (Class II)*** **Connected Actions.** For connected solar projects, construction and operation of the connected action projects would involve changes to the amount of impervious surface in the area as well as placement of structures in floodplains or areas that would experience shallow flooding following a precipitation event. These activities could result in a significant impact related to flood damage. With implementation of mit-igation, this impact would be less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.19-30	Under the header *Impact WR-4* in the first paragraph it states: Project construction would disturb soil and result in erosion and lowered water quality through increased turbidity and sediment deposition into local streams. Accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. Mitiga-tion Measure WR-2a requires a specific erosion control plan. Development and adherence to an SWPPP in conformance with the California General Permit for Discharges of Storm Water Associated with Con-struction Activity, administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards, requires best management practices to prevent and control erosion and siltation, contain and mitigate accidental spills during construction, and address treatment and disposal of any groundwater. Clean Water Act Sections 401 and 404 would provide additional water quality pro-tection. With implementation of mitigation, APM, and existing regulations, Impact WR-4 would be less than significant (Class II).	Please make the following revisions: Project construction would disturb soil and result in erosion and lowered water quality through increased turbidity and sediment deposition into local streams. Accidental spills or disposal of harmful materials used during construction could wash into and pollute surface waters or groundwater. Mitiga-tion Measure WR-2a requires a specific erosion control plan. Development and adherence to ~~an~~the SWPPPs in conformance with the applicable (California or federal) General Permit for Discharges of Storm Water Associated with Construction Activity~~ies, , administered by the California State Water Resources Control Board and the Regional Water Quality Control Boards~~, requires best management practices to prevent and control erosion and siltation, contain and mitigate accidental spills during construction, and address treatment (if required) and disposal of ~~any~~ dewatered groundwater. Clean Water Act Sections 401 and 404 would provide additional water quality protection. With implementation of mitigation, APM, and existing regulations, Impact WR-4 would be less than significant (Class II).

D.19-30	***Impact WR-4: The project would degrade water quality, or violate a water quality standard or waste discharge requirement (Class II)*** Construction and operation of the connected action projects would involve ground disturbance that could lead to increased erosion and sedimentation that could violate water quality standards. Also, acci-dental spills or disposal of harmful materials used during construction could wash into and pollute sur-face waters or groundwater. These activities would result in a significant impact related to water quality degradation. With implementation of mitigation, this impact would be less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.19-31	Under the header *Impact WR-2* in the last sentence it states: As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity.	Please make the following revisions: As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable ~~a National Pollution Discharge Elimination System (~~NPDES~~)~~ General Permits for Storm Water Discharges Associated with Construction Activity~~y~~ies.
D.19-34	Under the header *Impact WR-2* in the second paragraph in the third sentence it states: As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity.	Please make the following revisions: As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable ~~a National Pollution Discharge Elimination System (~~NPDES~~)~~ General Permits for Storm Water Discharges Associated with Construction Activity~~y~~ies.
D.19-35 through 36	D.19.4.3 Phased Build Alternative Impact WR-1: The project would deplete groundwater supplies or interfere with groundwater recharge Impact WR-2: The project would cause erosion and siltation Impact WR-3: The project would cause flood damage Impact WR-4: The project would degrade water quality, or violate a water quality standard or waste discharge requirement	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional waters and hydrology impacts beyond those analyzed for the Phased Build Alternative in the document, and could be greater than those identified for the Proposed Project.
D.19-36	Under the header *Impact WR-2* in the first paragraph in the second sentence it states: As a component of both the Proposed Project and this alternative, SCE would have to obtain a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity."	Please make the following revisions: As a component of both the Proposed Project and this alternative, SCE would have to obtain the applicable ~~a National Pollution Discharge Elimination System (~~NPDES~~)~~ General Permits for Storm Water Discharges Associated with Construction Activity~~y~~ies.
D.19-40	Within Table D.19-4, under WR-2a it states: **WR-2a: Implement an Erosion Control Plan and demonstrate compliance with water quality permits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction. The Erosion Control Plan may be part of the same document as the Stormwater Pollution Prevention Plan. Soil disturbance at structures and access roads is to be	The Erosion Control Plan will be incorporated into the Storm Water Pollution Prevention Plan, which will be written and implemented in compliance with the applicable Federal and California Construction General Permits for Storm Water. The SWPPP will be kept onsite and will be readily available on request. **WR-2a Implement an Erosion Control Plan and demonstrate compliance with water quality per-mits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM ~~for approval at least 60 days~~ prior to construction. The

	minimized and designed to prevent long-term erosion through revegetation or construction of permanent erosion control structures. The Erosion Control Plan shall include: □ The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads □ The location of all streams and drainage structures that would be directly affected by soil-disturbing activities (such as stream crossings or public storm drains by the right-of-way and access roads) □ Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction). □ If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the Regional Water Quality Control Board shall be submitted to the CPUC and BLM prior to its use. □ If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars). □ The location and type of all BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources. □ A proposed schedule for the implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details. □ Proposed schedule for inspection of erosion control/SWPPP measures and schedule for corrective actions/repairs, if required. Erosion control/SWPPP inspection reports shall be provided to the CPUC EM.	Erosion Control Plan may be part of the same document as the Storm ~~w~~Water Pollution Prevention Plan. Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion. ~~through revegetation or construction of permanent erosion control structures.~~ The Erosion Control Plan shall include: □ The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads □ BMPs will be included to protect drainage structures (such as public storm drains) down stream of soil disturbance activities. □ The location of all streams ~~and drainage structures~~ that would be directly affected by soil-disturbing activities (such as stream crossings ~~or public storm drains~~ by the right-of-way and access roads) □ Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction). □ If soil cement is proposed, the specific locations must be defined in the Plan~~,~~ and ~~evidence of approval by the Regional Water Quality Control Board~~ shall be submitted to the CPUC and BLM prior to its use. □ If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars). □ The location and type of ~~all~~ BMPs that would be installed to prevent off-site sedimenta-tion and to protect aquatic resources. □ ~~A proposed schedule for the~~ Specifications for implementation and maintenance of erosion control mea-sures and a description of the erosion control practices, including appropriate design and installation details. □ Proposed schedule for inspection of erosion control/SWPPP measures and schedule for corrective actions/repairs, if required. Erosion control/SWPPP inspection reports shall be kept in the SWPPP~~provided to the CPUC EM~~and be made available upon request.

D.19-40	**Monitoring / Reporting Action**	CPUC/BLM monitor to verify that Erosion Control Plan meets defined requirements, and that all required permits have been obtained prior to the start of construction in each segment.	Based on the edits to mitigation measure WR-2a, please make the following revisions to the Monitoring/Reporting Action: **Monitoring / Reporting Action** CPUC/BLM monitor to verify that ~~Erosion Control Plan~~ applicable SWPPP (includes Erosion Control Plan) has been prepared and permitted prior to the start of soil disturbing activities of the applicable construction project components. The SWPPPs will be prepared in compliance with the applicable Federal and California Construction General Permit requirements. ~~meets defined requirements, and that all required permits have been obtained prior to the start of construction in each segment.~~
D.19-40	SCE shall submit to the CPUC and BLM evidence of possession of all required permits before engaging in soil-disturbing construction/demolition activities, before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water. Such permits may include, but are not limited to, a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a CWA Section 402 NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and/or a CWA Section 401 certification from the applicable RWQCBs.	Please make the following revisions: SCE shall submit to the CPUC and BLM evidence of possession of ~~all~~ applicable required permits for the representative land disturbance area prior to~~before~~ engaging in soil-disturbing construction/demolition activities. ~~before entering flowing or ponded water, or before constructing a crossing at flowing or ponded water.~~ Such permits may include, but are not limited to, ~~a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Clean Water Act (CWA) Section 404 permit from the USACE, a~~ Clean Water Act (CWA) Section 402 NPDES California General Permits for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs) and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land. ~~, and/or a CWA Section 401 certification from the applicable RWQCBs.~~ Prior to ground disturbance in waters (e.g., maintenance grading or constructing a crossing at flowing or ponded water, etc.), SCE will obtain a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a ~~Clean Water Act (~~CWA~~)~~ Section 404 permit from the USACE, and a CWA Section 401 certification from the SWRCB.
D.19-41	**WR-3a: Implement flood, erosion, and scour protection for aboveground and belowground improvements.** SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures and other above-ground features, as well as new underground conduits. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determi-nation identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer. SCE shall provide the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan)).	Based on the edits provided in previous comments, please make the following revision: **WR-3a Implement flood, erosion, and scour protection for aboveground and belowground improve-ments.** SCE shall make a determination during final project design phase as to the erosion and 100-year scour potential for watercourses near proposed structures with a foundation ~~and other above-ground features~~, as well as new underground conduits located within mapped FEMA 100-year flood zone boundaries. This determination shall be made by a registered professional engineer with expertise in river mechanics. If the determination identifies specific structures or underground conduits that may be subject to scour or lateral movement of a stream channel, these structures shall be protected against 100-year scour and/or lateral erosion through modifications of the foundation design, or otherwise in a manner determined to be appropriate by the river mechanics engineer. SCE shall provide appropriate documentation that indicates incorporation of scour depths into the foundation design. ~~the initial determination and the recommended corrective actions to the CPUC and BLM prior to the start of construction (as defined in Mitigation Measure EM-1a (Prepare monitoring plan))~~.
D.19-42	_____. 1995. Water Quality Control Plan Santa Ana River Basin.	Please make the following revisions to the third reference: RWQCBSAR (California Regional Water Quality Control Board Santa Ana River Region). 2014. ~~1995.~~Water Quality Control Plan Santa Ana River Basin.

D.19-42	References	Please add the following missing reference: Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land
WILDLAND FIRE		
D.20-1	The presence of a transmission line can hinder initial attack and containment in the event of a fire in the vicinity of the line. The presence of structures and conductors can pose risks to firefighters, both on the ground and in the air. Where overhead power lines are present, aerial and ground attacks are restricted. Aerial operations are complicated by the risk of aircraft and/or water buckets colliding with structures or conductors during smoky, reduced-visibility conditions. Conditions are especially hazardous when trans-mission lines are placed on ridge tops, reducing the proximity of fire retardant and water drop deliveries that aerial firefighting crews can achieve safely. For these reasons, pilots are kept apprised of the loca-tion of transmission lines. Firefighters on the ground can be put at risk if charged particles in heavy smoke create a short circuit or arc between an energized line and the earth, a person, or firefighting equipment. For this reason, firefighting protocols require crews to maintain certain distances from ener-gized lines. Fire managers coordinate with utilities on shutting down lines as needed. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.	To acknowledge beneficial aspects of utility facilities, please make the following revisions: The presence of a transmission line can hinder initial attack and containment in the event of a fire in the vicinity of the line. The presence of structures and conductors can pose risks to firefighters, both on the ground and in the air. Where overhead power lines are present, aerial and ground attacks are restricted. Aerial operations are complicated by the risk of aircraft and/or water buckets colliding with structures or conductors during smoky, reduced-visibility conditions. Conditions are especially hazardous when trans-mission lines are placed on ridge tops, reducing the proximity of fire retardant and water drop deliveries that aerial firefighting crews can achieve safely. For these reasons, pilots are kept apprised of the loca-tion of transmission lines. Firefighters on the ground can be put at risk if charged particles in heavy smoke create a short circuit or arc between an energized line and the earth, a person, or firefighting equipment. For this reason, firefighting protocols require crews to maintain certain distances from ener-gized lines. Fire managers coordinate with utilities on shutting down lines as needed. Conversely, utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.

D.20-1	MITIGATION MEASURE WF-1a: Prepare and implement a Fire Management Plan. A Project-specific fire prevention plan for both construction and operation of the project shall be prepared by SCE and submitted to for review prior to initiation of construction. The draft copy of this Plan is to be provided to each fire agency at least 90 days before the start of any construction activities in areas desig-nated as Very High or High Fire Hazard Severity Zones. Plan reviewers shall include CPUC, BLM, CAL FIRE, San Bernardino and Riverside Counties, and local municipal fire agencies with jurisdiction over areas where the project is located. Comments on the Plan shall be pro-vided by SCE to all other participants, and SCE shall resolve each comment in consultation with CAL FIRE, BLM, and the Morongo Fire Department, as appropriate. The final Plan shall be approved by these agencies at least 30 days prior to the initiation of construction activities. SCE shall fully implement the Plan during all construction and maintenance activities. A project Fire Marshal or similar qualified position shall be established by SCE to enforce all provisions of the Fire Management Plan as well as perform other duties related to fire detection, prevention, and suppression for the project. SCE shall monitor construction activities to ensure implementation and effectiveness of the plan. The Plan shall include at a minimum SCE's Specification E-2005-104 (Transmission line Project Fire Plan), including any updates and amendments, and other requirements specified below. The plan should recognize and prepare for the high probability that fast moving, wind driven wildfires will burn adjacent or through the Proposed Project with some regularity as the result of severe fire weather conditions, flash fuels such as provided by perennial grasslands, and abundant ignition sources. Wind driven fires can quickly overcome operational and maintenance crews, placing their health and safety at risk. The Plan shall cover: □ The purpose and applicability of the plan; □ Responsibilities and duties; □ Preparedness training and drills; □ Procedures for fire reporting, response, and prevention that include: – identification of daily site-specific risk conditions – the tools and equipment needed on vehicles and to be on hand at sites – reiteration of fire prevention and safety considerations during tailboard meetings – daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity, □ Coordination procedures with BLM and San Bernardino and Riverside County fire officials. □ Crew training, including fire safety practices and restrictions, □ Method for verification that Plan protocols and requirements are being followed.	The requirements of the mitigation measure are disproportionate to the impact in terms of the required time and effort for the required coordination as compared to the benefit of said coordination. Please make the following revisions: MITIGATION MEASURE WF-1a: Prepare and implement a Fire Management Plan. A Project-specific fire prevention plan for both construction and operation of the project shall be prepared by SCE and submitted to for review to the CPUC and BLM prior to initiation of construction. ~~The draft copy of this Plan is to be provided to each fire agency at least 90 days before the start of any construction activities in areas desig-nated as Very High or High Fire Hazard Severity Zones. Plan reviewers shall include CPUC, BLM, CAL FIRE, San Bernardino and Riverside Counties, and local municipal fire agencies with jurisdiction over areas where the project is located. Comments on the Plan shall be pro-vided by SCE to all other participants, and SCE shall resolve each comment in consultation with CAL FIRE, BLM, and the Morongo Fire Department, as appropriate. The final Plan shall be approved by these agencies at least 30 days prior to the initiation of construction activities.~~ SCE shall fully implement the Plan during all construction and maintenance activities. A project Fire Marshal or similar qualified position shall be established by SCE to enforce all provisions of the Fire Management Plan as well as perform other duties related to fire detection, prevention, and suppression for the project. SCE shall monitor construction activities to ensure implementation and effectiveness of the plan. The Plan shall include at a minimum SCE's Specification E-2005-104 (Transmission line Project Fire Plan), including any updates and amendments, and other requirements specified below. The plan should recognize and prepare for the high probability that fast moving, wind driven wildfires will burn adjacent or through the Proposed Project with some regularity as the result of severe fire weather conditions, flash fuels such as provided by perennial grasslands, and abundant ignition sources. Wind driven fires can quickly overcome operational and maintenance crews, placing their health and safety at risk. The Plan shall cover: □ The purpose and applicability of the plan; □ Responsibilities and duties; □ Preparedness training ~~and drills~~; □ Procedures for fire reporting, response, and prevention that include: – identification of daily site-specific risk conditions – the tools and equipment needed on vehicles and to be on hand at sites – reiteration of fire prevention and safety considerations during tailboard meetings – daily monitoring of the red-flag warning system with appropriate restrictions on types and levels of permissible activity, □ Coordination procedures with BLM and San Bernardino and Riverside County fire officials. □ Crew training, including fire safety practices and restrictions, □ Method for verification that Plan protocols and requirements are being followed.

D.20-11-12	**D.20.3.2 CEQA Significance Criteria** The Hazards and Hazardous materials section of CEQA Guidelines Appendix G identifies one question with regard to wildland fire: □□Would the project "expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?" This question and others related to wildland fire hazards are addressed in this EIR/EIS by considering the following evaluation criteria, which are based on the nature of the Proposed Project and the existing environment: a) Would project activities required during construction or maintenance increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources? b) Would the presence of the overhead transmission lines increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources? c) Would the presence of the project create obstructions or impediments to fire suppression efforts, resulting in damaging impacts to communities and/or natural resources? d) Would activities associated with project construction or maintenance result in a vegetation mix that could increase ignition potential and rate of fire spread? The criteria used to evaluate these questions are (1) the degree to which the existing situation in the ROW with regard to wildland fire risk and fire suppression would be changed by implementation of the Proposed Project and (2) whether such a change is meaningful.	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following: ~~This question and others related to wildland fire hazards are addressed in this EIR/EIS by considering the following evaluation criteria, which are based on the nature of the Proposed Project and the existing environment:~~ ~~a) Would project activities required during construction or maintenance increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or nat-ural resources?~~ ~~b) Would the presence of the overhead transmission lines increase the probability of a wildland fire, resulting in damaging impacts to communities, firefighter health and safety, and/or natural resources?~~ ~~c) Would the presence of the project create obstructions or impediments to fire suppression efforts, resulting in damaging impacts to communities and/or natural resources?~~ ~~d) Would activities associated with project construction or maintenance result in a vegetation mix that could increase ignition potential and rate of fire spread?~~ ~~The criteria used to evaluate these questions are (1) the degree to which the existing situation in the ROW with regard to wildland fire risk and fire suppression would be changed by implementation of the Proposed Project and (2) whether such a change is meaningful.~~
D.20-14	***Impact WF-2: The presence of overhead transmission lines would increase the probability of a wildland fire.***	The Proposed Project would reduce the number of towers and that should be noted in the text. Please add the following language: Together, these factors make it highly unlikely that the 220 kV transmission line would pose a fire hazard through arcing or line failure. Additionally, the ROW currently has 220 kV circuits located in it, and the Proposed Project would reduce the number of structures within the corridor, thus not adding a significant new risk as compared to existing conditions.
D.20-19	***Impact WF-1: Construction or maintenance activities would increase the probability of a wildland fire (Class II)*** For connected actions in the Desert Center and Blythe areas, mitigation measures to address increased wildfire risks during construction and operation of the facilities are expected to be required by the agen-cies approving those projects. These would be tailored to the nature of the project and local conditions. These would ensure that this impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

D.20-19	After implementation of the Proposed Project, conditions in the ROW with regard to wildfire risks would not be significantly changed from existing conditions. Towers and conductors would still be present in approximately the same locations. SCE and fire agencies would continue to follow existing procedures and regulations for managing wildfire risk. No mitigation is required. The impact would be less than significant (Class III).	For clarification, please make the following revisions: After implementation of the Proposed Project, conditions in the ROW with regard to wildfire risks would not be significantly changed from existing conditions. However, the Proposed Project would reduce the number of structures within the corridor. Towers and conductors would still be present in approximately the same locations. SCE and fire agencies would continue to follow existing procedures and regulations for managing wildfire risk. No mitigation is required. The impact would be less than significant (Class III).
D.20-19	***Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts (Class III)*** With implementation of the Proposed Project, structure and conductor heights in the ROW and safety distances from the transmission line would increase nominally. This would not be a significant change from existing conditions. SCE and fire agencies would continue to follow existing procedures and regula-tions for conducting and managing wildfire suppression. No mitigation is required. The impact would be less than significant (Class III).	The Proposed Project would reduce the number of towers, which should be noted in the text. The presence of the project can also provide benefit to fire suppression efforts; please add the following language: <u>The Proposed Project would reduce the number of towers. Utility facilities can also assist initial attack and containment in the event of a fire in the vicinity of a line. Access roads to structures can also provide fire crews access to the area and be used as potential fire breaks.</u>
D.20-19	***Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts (Class III)*** For connected actions in the Desert Center and Blythe areas, gen-tie lines would be installed; however, these not as tall as high-voltage transmission lines. Also, the areas of the connected actions are sparsely vegetated, reducing fire risk. During fire suppression activity, pilots and ground crews are advised of the location of lines. Agencies would follow existing procedures for conducting and managing wildfire sup-pression. These would ensure that this impact is less than significant (Class III).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.20-20	***Impact WF-4: Construction or maintenance activities would result in a vegetation fuel mix that increases ignition potential and rate of fire spread (Class II)*** For connected actions, approving agencies are expected to require weed management and abatement programs to address this impact. These measures would ensure that this impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.20-24	D.20.4.3 Phased Build Alternative Impact WF-1: Construction or maintenance activities would increase the probability of a wildland fire Impact WF-2: The presence of overhead transmission lines would increase the probability of a wildland fire Impact WF-3: The presence of the project would create new obstructions to fire suppression efforts Impact WF-4: Construction or maintenance activities would result in a vegetation fuel mix that increases ignition potential and rate of fire spread	As explained in SCE's accompanying cover letter, initial review of the Phased Build Alternative has determined there are a multitude of construction requirements that are necessary for the Phased Build Alternative which were either not addressed or were understated in the DEIR/DEIS. At a minimum, these additional construction requirements would require additional study and associated additional impact analysis. The additional disturbance areas and the increased duration could result in additional wildland fire impacts beyond those analyzed for the PBA in the document and could be greater than those identified for the Proposed Project.

ELECTRICAL INTERFERENCE AND SAFETY		
D.21-1	This section describes certain effects that are unique to public safety in the vicinity of electrical transmission, including electrical interference and hazards. Please see EIR/EIS Section B.5 for information on electric and magnetic fields (EMF). The following discussions address existing environmental conditions in the affected area, identify and analyze environmental impacts, and recommend measures to reduce or avoid adverse impacts anticipated from project construction and operation. In addition, existing laws and regulations relevant to electrical interference and safety are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might other-wise occur with the implementation of the project. Section D.21.1 presents the affected environment for Electrical Interference and Safety. Relevant regulations and standards are summarized in Section D.21.2. Sections D.21.3 through D.21.5 describe the impacts of the Proposed Project and the alter-natives. Section D.21.6 presents the mitigation measures and mitigation monitoring requirements, and D.21.7 lists references cited.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: This section describes certain <u>potential</u> effects that are unique to public safety in the vicinity of electrical transmission, including electrical interference and hazards. Please see EIR/EIS Section B.5 for information on electric and magnetic fields (EMF). The following discussions address existing environmental conditions in the affected area, identify and analyze environmental impacts, and recommend measures to reduce or avoid <u>potential</u> adverse impacts anticipated from project construction and operation. In addition, existing laws and regulations relevant to electrical interference and safety are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that might other-wise occur with the implementation of the project. Section D.21.1 presents the affected environment for <u>potential</u> Electrical Interference and Safety. Relevant regulations and standards are summarized in Section D.21.2. Sections D.21.3 through D.21.5 describe the impacts of the Proposed Project and the alter-natives. Section D.21.6 presents the mitigation measures and mitigation monitoring requirements, and D.21.7 lists references cited.
D.21-1	Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses since the equipment is shielded by buildings and walls. However, magnetic fields can penetrate buildings and walls, thereby interacting with electronic equipment. Depending upon the sensitivity of equipment, the magnetic fields have been found to interfere with electric equipment operation…	As there is no evidence that the existing or future magnetic fields will interact with electronic equipment please make the following revisions: Electric fields from power lines do not typically pose interference problems for electronic equipment in businesses since the equipment is shielded by buildings and walls. However, magnetic fields can penetrate buildings and walls, thereby <u>potentially</u> interacting with electronic equipment. Depending upon the sensitivity of equipment, the magnetic fields have been found to interfere with electric equipment operation…
D.21-2	The most common electronic equipment that can be susceptible to magnetic field interference is older CRT televisions or computer monitors. Magnetic field interference results in disturbances to the image displayed on the monitor, often described as screen distortion, "jitter," or other visual defects. In most cases it is annoying, and at its worst, it can prevent use of the monitor. This type of interference is a recognized problem in the video monitor industry. As a result, there are manufacturers who specialize in monitor interference solutions and shielding equipment. Possible solutions to this problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of CRT monitors with current technology displays that are not susceptible to magnetic field interference.	As there is no evidence that existing or future magnetic fields will interfere with electronic devices please make the following revisions: The most common electronic equipment that can be susceptible to magnetic field interference is older CRT televisions or computer monitors. <u>Potential</u> magnetic field interference results in disturbances to the image displayed on the monitor, often described as screen distortion, "jitter," or other visual defects. In most cases it is annoying, and at its worst, it can prevent use of the monitor. This type of interference is a recognized problem in the video monitor industry. As a result, there are manufacturers who specialize in monitor interference solutions and shielding equipment. Possible solutions to this <u>potential</u> problem include: relocation of the monitor, use of magnetic shield enclosures, software programs, and replacement of CRT monitors with current technology displays that are not susceptible to magnetic field interference.
D.21-2	Power line fields can induce voltages and currents on conductive objects, such as metal roofs or buildings, fences, and vehicles. Transmission lines are designed to limit the short circuit current, from conductive items beneath the line, to a safe level (less than 5 milliampere). When a person or animal comes in contact with a conductive object, a perceptible current or small electric shock may occur. These small electric shocks cause no physiological harm; however, they may present a nuisance.	To clarify that the text is address conductive materials, please make the following revisions: Power line fields can induce voltages and currents on conductive objects, such as metal roofs or buildings, <u>metal</u> fences, and vehicles. Transmission lines are designed to limit the short circuit current, from conductive items beneath the line, to a safe level (less than 5 milliampere). When a person or animal comes in contact with a conductive object, a perceptible current or small electric shock may occur. These small electric shocks cause no physiological harm; however, they may present a nuisance.

D.21-2	The connected solar projects would be located in rural or remote areas and would interconnect to existing substations. The lines connecting the generators to the substations (gen-tie lines) would be in existing transmission line corridors or require new corridors. The effect in terms of electrical interference and safety would be similar in nature to the Proposed Project. However, the connected action projects are in remote or rural areas and the population in the vicinity of these lines would be low.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The connected solar projects would be located in rural or remote areas and would interconnect to existing substations. The lines connecting the generators to the substations (gen-tie lines) would be in existing transmission line corridors or require new corridors. The effect in terms of potential electrical interference and safety ~~would~~ could be similar in nature to the Proposed Project. However, the connected action projects are in remote or rural areas and the population in the vicinity of these lines would be low.
D.21-3	The impact assessment for electrical interference and hazards was conducted through a review of the change in power line field strength in the environment that would occur due to the construction and operation of the project. Within the ROW, the proposed transmission line would be the predominant source of electrical interference and hazards. Further, the area within the transmission line ROW is within the control of SCE with regard to development land use restrictions and public access. In areas outside of the ROW, and as the distance from the transmission line increases, there may be other sources of electrical interference and hazards not associated with the project that affect the level of electrical interference. Therefore, the edge of the transmission line ROW was adopted as the point of reference for assessing Project impacts with respect to electrical interference and hazards.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The impact assessment for potential electrical interference and hazards was conducted through a review of the change in power line field strength in the environment that would occur due to the construction and operation of the project. Within the ROW, the proposed transmission line would be the predominant source of potential electrical interference and hazards. Further, the area within the transmission line ROW is within the control of SCE with regard to development land use restrictions and public access. In areas outside of the ROW, and as the distance from the transmission line increases, there may be other sources of potential electrical interference and hazards not associated with the project that affect the level of potential electrical interference. Therefore, the edge of the transmission line ROW was adopted as the point of reference for assessing Project impacts with respect to potential electrical interference and hazards.
D.21-4	D.21.3.2 CEQA Significance Criteria The Environmental Checklist Form in Appendix G of the State CEQA Guidelines does not provide any significance criteria related to electrical hazards and interference. CEQA significance determinations for electrical interference and safety are made based on reasonably assumed potential impacts, as described below. For purposes of the CEQA analysis for this Project, an impact would be considered significant and require additional mitigation if Project construction or if maintenance of Project facilities during Project operations would: — Create interference with radio, television, communications, or electronic equipment. — Create hazards to the public through Project-induced currents or shocks. — Create interference with cardiac pacemakers.	Significance criteria not found in the California Environmental Quality Act (CEQA) guidelines are not appropriate for inclusion in an analysis of CEQA Significance Criteria. As such, please remove the following: ~~— Create interference with radio, television, communications, or electronic equipment.~~ ~~— Create hazards to the public through Project-induced currents or shocks.~~ ~~— Create interference with cardiac pacemakers.~~
D.21-4	SCE proposed no Applicant Proposed Measures related to electrical interference and hazards.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: SCE proposed no Applicant Proposed Measures related to potential electrical interference and hazards.
D.21-4	This section presents discussion of impacts related to electrical interference and safety, and mitigation measures for the West of Devers Upgrade Project.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: This section presents discussion of impacts related to potential electrical interference and safety, and mitigation measures for the West of Devers Upgrade Project.

D.21-4	The Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could cause the following types of electrical interference and hazards.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: The Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could cause the following types of <u>potential</u> electrical interference and hazards.
D.21-4	Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if it were to occur. Individual sources of adverse radio/television interference impacts can be located and corrected on power lines. Conversely, magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a and EIS-1b would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards or that corona will be an issue, please make the following revisions: Corona or gap discharges related to high frequency radio and television interference impacts are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if it were to occur. Individual sources of <u>potential</u> adverse radio/television interference impacts can be located and corrected on power lines. Conversely, <u>potential</u> magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a and EIS-1b would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.
D.20-5	**EIS-2a Implement grounding measures.** As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall docu-ment the threshold electric field strength and metallic object size at which grounding becomes necessary.	Please make the following clarifying revisions: **EIS-2a Implement grounding measures.** As part of the siting and construction process, SCE shall identify objects (such as <u>metal</u> fences, metal buildings, and <u>metal</u> pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall docu-ment the threshold electric field strength and metallic object size at which grounding becomes necessary.
D.21-5	The Proposed Project's direct and indirect impacts to electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a and EIS-1b, presented below. Mitigation Measure EIS-1a (Limit the conductor surface gradient) ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) ensures complaints regarding electronic interference would be logged and resolved to the extent feasible.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: The Proposed Project's direct and indirect impacts to <u>potential</u> electrical interference with radio, television, communications, or electronic equipment during O&M would be minimized or avoided through the implementation of Mitigation Measures EIS-1a and EIS-1b, presented below. Mitigation Measure EIS-1a (Limit the conductor surface gradient) ensures reduction of the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide. In addition, Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) ensures complaints regarding electronic interference would be logged and resolved to the extent feasible.
D.21-5	**EIS-2a Implement grounding measures.** As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.	To clarify that the text addresses conductive materials, please make the following revisions: **EIS-2a Implement grounding measures.** As part of the siting and construction process, SCE shall identify objects (such as <u>metal</u> fences, metal buildings, and <u>metal</u> pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.
D.21-6	The impacts of the connected solar projects in terms of electrical interference and safety would be similar to those described for the Proposed Project. The impacts would be created by the gen-tie lines connecting the solar projects to SCE substations. Because of the remote location of the solar projects, the potentially affected population would be small.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The impacts of the connected solar projects in terms of <u>potential</u> electrical interference and safety ~~would~~ <u>could</u> be similar to those described for the Proposed Project. The <u>potential</u> impacts would be created by the gen-tie lines connecting the solar projects to SCE substations. Because of the remote location of the solar projects, the potentially affected population would be small.

D.21-6	This impact would be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The potential impact ~~would~~ could be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.
D.21-6	This impact would be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The potential impact ~~would~~ could be similar to the Proposed Project, but reduced in severity due to the short length and remote location of the gen-tie lines.
D.21-6 through 7	***Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)*** For the connected solar projects, gen-tie lines would be required to comply with existing industry stand-ards. While the facilities would be in remote locations, implementation of mitigation similar to Mitiga-tion Measures EIS-1a and EIS-1b would ensure that the impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.
D.21-7	The function of some pacemakers could be altered by exposure to electric fields that would be gene-rated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant for both the Proposed Project and for gen-tie lines associated with the connected solar projects. No mitigation is required (Class III).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: The function of some pacemakers could be potentially altered by exposure to electric fields that would be gene-rated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant for both the Proposed Project and for gen-tie lines associated with the connected solar projects. No mitigation is required (Class III).
D.21-7	***Impact EIS-2: Project-induced currents or shocks would create hazards to the public (Class II)*** Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the impact is less than significant (Class II).	The DEIR should clarify that the potential mitigation measures for the connected actions will not be imposed on SCE, nor are they required to be implemented prior to construction of the West of Devers project.

D.21-6 through D.21-7	Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. Mitigation Measure EIS-1a (Limit the conductor surface gradient) would require SCE to limit the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide, which would minimize disruptions to radio, television, communications, or electrical equipment. Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) would require SCE to respond to, document, and resolve interference complaints related to corona or gap discharges after energizing the transmission line. With implementation of these mitigation measures, this impact would be less than significant (Class II). For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the impact is less than significant (Class II).	As there is no evidence that proposed transmission lines will introduce adverse impacts from corona discharge, please make the following revisions: Corona or gap discharges related to transmission line operation could <u>potentially</u> cause localized and temporary disruptions to radio, television, communications, or electronic equipment. Mitigation Measure EIS-1a (Limit the conductor surface gradient) would require SCE to limit the conductor surface gradient in accordance with the IEEE Radio Noise Design Guide, which would minimize <u>potential</u> disruptions to radio, television, communications, or electrical equipment. Mitigation Measure EIS-1b (Document and resolve electronic interference complaints) would require SCE to respond to, document, and resolve <u>potential</u> interference complaints related to corona or gap discharges after energizing the transmission line. With implementation of these mitigation measures, this <u>potential</u> impact would be less than significant (Class II). For the connected solar projects, gen-tie lines would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measures EIS-1a and EIS-1b would ensure that the <u>potential</u> impact is less than significant (Class II).
D.21-7	After the gen-tie lines are energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. Mitigation Measure EIS-2a (Implement grounding measures) would reduce the potential for this adverse impact through the provision of a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock. With implementation of mitigation, this impact would be less than significant (Class II). Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the impact is less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: After the gen-tie lines are energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. Mitigation Measure EIS-2a (Implement grounding measures) would reduce the potential for this adverse impact through the provision of a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock. With implementation of mitigation, this <u>potential</u> impact would be less than significant (Class II). Gen-tie lines for the solar projects would be required to comply with existing industry standards. While the facilities would be in remote locations, implementation of mitigation similar to Mitigation Measure EIS-2a would ensure that the <u>potential</u> impact is less than significant (Class II).
D.21-7	Three alternatives are considered in this section; all of these alternatives would be located within the existing WOD ROW. The No Project/No Action Alternative is evaluated in Section D.21.5. Alternatives are described in detail in Appendix 5 (Alternatives Screening Report) and are summarized in Section C. Electrical interference and safety within the ROW is described in Section D.21.1.1 above; the description of the environmental setting would apply equally to the alternatives.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: Three alternatives are considered in this section; all of these alternatives would be located within the existing WOD ROW. The No Project/No Action Alternative is evaluated in Section D.21.5. Alternatives are described in detail in Appendix 5 (Alternatives Screening Report) and are summarized in Section C. <u>Potential</u> ~~E~~electrical interference and safety within the ROW is described in Section D.21.1.1 above; the description of the environmental setting would apply equally to the alternatives.

D.21-7	The Tower Relocation Alternative would locate certain transmission structures in Segments 4 and 6 farther from existing homes than would be the case under the Proposed Project. Three impacts related to electrical interference and safety were identified for the Proposed Project. These impacts also would apply to the Tower Relocation Alternative, which overall would be the same as the Proposed Project, with the exception of the relocated transmission towers that are described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The Tower Relocation Alternative would locate certain transmission structures in Segments 4 and 6 farther from existing homes than would be the case under the Proposed Project. Three <u>potential</u> impacts related to electrical interference and safety were identified for the Proposed Project. These <u>potential</u> impacts also would apply to the Tower Relocation Alternative, which overall would be the same as the Proposed Project, with the exception of the relocated transmission towers that are described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.
D.21-8	The minor adjustment to the location of these towers would not differ from the Proposed Project's minor risk of interference with cardiac pacemakers. No mitigation is proposed.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: The minor adjustment to the location of these towers would not differ from the Proposed Project's minor <u>potential</u> risk of interference with cardiac pacemakers. No mitigation is proposed.
D.21-8	The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: The CEQA significance determination for each <u>potential</u> electrical interference and safety impact in this alternative is presented below.
D.21-8	In general, the relocated towers would be moved approximately 50 feet farther from the southern edge of the ROW. Relocating towers in the identified project segments would shift the transmission line slightly farther from the edge of the ROW. This nominal change in distance is not expected to substantially alter (increase or decrease) the effects of the transmission line with regard to electric interference, although the risk of electric interference would be reduced very slightly for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: In general, the relocated towers would be moved approximately 50 feet farther from the southern edge of the ROW. Relocating towers in the identified project segments would shift the transmission line slightly farther from the edge of the ROW. This nominal change in distance is not expected to substantially alter (increase or decrease) the effects of the transmission line with regard to <u>potential</u> electric interference, although the risk of <u>potential</u> electric interference would be reduced very slightly for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit <u>potential</u> interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.
D.21-8	Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: Corona or gap discharges related to transmission line operation could <u>potentially</u> cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this <u>potential</u> impact would be less than significant (Class II).

D.21-8	After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).
D.21-8	The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The function of some pacemakers could potentially be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).
D.21-9	The Iowa Street 66 kV Underground Alternative would place a 1,600-foot segment of subtransmission line underground, rather than overhead. Three impacts were identified under the Proposed Project for electrical interference and safety. These impacts also would apply to the Iowa Street 66 kV Underground Alternative, which overall would be the same as the Proposed Project, with the exception of the underground portion of the subtransmission line that is described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The Iowa Street 66 kV Underground Alternative would place a 1,600-foot segment of subtransmission line underground, rather than overhead. Three potential impacts were identified under the Proposed Project for electrical interference and safety. These potential impacts also would apply to the Iowa Street 66 kV Underground Alternative, which overall would be the same as the Proposed Project, with the exception of the underground portion of the subtransmission line that is described above and in Appendix 5. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.
D.21-9	This alternative would place a 1,600-foot segment of 66 kV subtransmission line underground instead of on overhead poles. This short underground segment would decrease slightly the effects of the transmission line with regard to electric interference for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revision: This alternative would place a 1,600-foot segment of 66 kV subtransmission line underground instead of on overhead poles. This short underground segment would decrease slightly the effects of the transmission line with regard to potential electric interference for the nearest residents. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit the potential interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.
D.21-9	This short underground segment would decrease slightly the Proposed Project's risk to the public through project-induced currents or shocks, because the conductors in this area would be underground and not accessible. There would be transition structures at the north and south ends of the under-ground segment, and these facilities would still have the potential to create shock hazards. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: This short underground segment would decrease slightly the Proposed Project's potential risk to the public through project-induced currents or shocks, because the conductors in this area would be underground and not accessible. There would be transition structures at the north and south ends of the under-ground segment, and these facilities would still have the potential to create shock hazards. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).

D.21-9	This short underground segment would decrease slightly the risk of interference with cardiac pacemakers as compared with the Proposed Project. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: This short underground segment would decrease slightly the potential risk of interference with cardiac pacemakers as compared with the Proposed Project. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.
D.21-9	The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions. The CEQA significance determination for each potential electrical interference and safety impact in this alternative is presented below.
D.21-9	Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: Corona or gap discharges related to transmission line operation could potentially cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this potential impact would be less than significant (Class II).
D.21-10	The Iowa Street 66 kV Underground Alternative would eliminate the potential for induced current or shocks in the underground segment, but the transition structures would remain at each end of the segment. At these structures, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The Iowa Street 66 kV Underground Alternative would eliminate the potential for induced current or shocks in the underground segment, but the transition structures would remain at each end of the segment. At these structures, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).
D.29-10	The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).

D.21-10	The Phased Build Alternative would retain existing double-circuit 220 kV transmission structures to the extent feasible, remove single-circuit structures, add new double-circuit 220 kV structures, and string all structures with higher-capacity conductors. Three impacts were identified under the Proposed Project for electrical interference and safety. These impacts also would apply to the Phased Build Alternative, which would be located in the same corridor as the Proposed Project and would involve similar although less intense construction activities. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The Phased Build Alternative would retain existing double-circuit 220 kV transmission structures to the extent feasible, remove single-circuit structures, add new double-circuit 220 kV structures, and string all structures with higher-capacity conductors. Three <u>potential</u> impacts were identified under the Proposed Project for electrical interference and safety. These <u>potential</u> impacts also would apply to the Phased Build Alternative, which would be located in the same corridor as the Proposed Project and would involve similar although less intense construction activities. The full text of all mitigation measures referenced in this section is presented in Section D.21.3.3, except where otherwise noted.
D.21-10	In the locations where the structures in this alternative would be farther from the edge of the ROW than the Proposed Project structures, the potential for project-induced electrical interference would be reduced. Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference. The same as for the Proposed Project, corona or gap discharges related to high frequency radio and television interference adverse effects are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if they were to occur. Individual sources of adverse radio/television interference impacts can be located and corrected on power lines. Conversely, magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.	There is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards. Electrical interference with radio, television, etc. is based on electrical field influences as opposed to magnetic field, therefore, given that the alternative operates at the same voltage as the proposed project there will be no reduction of the interference by selection of the alternative. Please make the following revisions: In the locations where the structures in this alternative would be farther from the edge of the ROW than the Proposed Project structures, the potential for project-induced electrical interference would be reduced. ~~Also, less power would flow through the transmission lines in this alternative compared to the Proposed Project, and it is assumed that this reduced amount of power flow would also lead to a reduced potential for electrical interference.~~ The same as for the Proposed Project, corona or gap discharges related to high frequency radio and television interference <u>potential</u> adverse effects are dependent upon several factors, including the strength of broadcast signals and are anticipated to be very localized, if they were to occur. Individual sources of <u>potential</u> adverse radio/television interference impacts can be located and corrected on power lines. Conversely, <u>potential</u> magnetic field interference with electronic equipment, such as older CRT monitors, can be corrected through the use of software, shielding, or changes at the monitor location. Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints) would limit the <u>potential</u> interference by reducing corona discharges from the energized conductor and by addressing loose connections that result in gap discharges.
D.21-10 through 11	Due to the Segment 4 and 6 locations where the alternative would be further from the edge of ROW than the Proposed Project, the potential for hazards to the public due to project-induced currents may be reduced for the nearest residents compared to the Proposed Project. However, because much of the ROW is accessible to the public the risk of project-induced currents or shocks would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, induced currents and voltages on conducting objects near the proposed transmission lines represent a potential adverse impact that can be mitigated. These impacts do not pose a threat in the environment if the conducting objects are properly grounded. Mitigation Measure EIS-2a (Implement grounding measures) would provide a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: Due to the Segment 4 and 6 locations where the alternative would be further from the edge of ROW than the Proposed Project, the potential for hazards to the public due to project-induced currents may be reduced for the nearest residents compared to the Proposed Project. However, because much of the ROW is accessible to the public the <u>potential</u> risk of project-induced currents or shocks would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, induced currents and voltages on conducting objects near the proposed transmission lines represent a potential adverse impact that can be mitigated. These <u>potential</u> impacts do not pose a threat in the environment if the conducting objects are properly grounded. Mitigation Measure EIS-2a (Implement grounding measures) would provide a conductive path to ground thereby avoiding a buildup of electrical potential that could discharge as an electrical shock.

D.21-11	The potential for interference with cardiac pacemakers would be slightly reduced compared to the Pro-posed Project for locations along the corridor where the structures in this alternative would be located further from the edge of the ROW. However, because much of the ROW is accessible to the public the risk of interference with cardiac pacemakers would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, the function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project (i.e., adjacent to the transmission line ROW), potentially resulting in inaccurate detections by the pacemaker of normal cardiac signals or resulting in inappropriate behavior, until the field strength is reduced by the individual leaving the immediate area. However, the biological consequences of transient, reversible pacemaker malfunction are mostly benign because, as discussed in Section D.21.3.3, most modern units revert to a fixed-rate pacing mode, which is life-sustaining. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The potential for interference with cardiac pacemakers would be slightly reduced compared to the Proposed Project for locations along the corridor where the structures in this alternative would be located further from the edge of the ROW. However, because much of the ROW is accessible to the public the <u>potential</u> risk of interference with cardiac pacemakers would be substantially the same regardless of the tower locations within the ROW. The same as for the Proposed Project, the function of some pacemakers could be <u>potentially</u> altered by exposure to electric fields that would be generated in the immediate vicinity of the project (i.e., adjacent to the transmission line ROW), potentially resulting in inaccurate detections by the pacemaker of normal cardiac signals or resulting in inappropriate behavior, until the field strength is reduced by the individual leaving the immediate area. However, the biological consequences of transient, reversible pacemaker malfunction are mostly benign because, as discussed in Section D.21.3.3, most modern units revert to a fixed-rate pacing mode, which is life-sustaining. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers. No mitigation is proposed.
D.21-11	The CEQA significance determination for each electrical interference and safety impact in this alternative is presented below.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The CEQA significance determination for each <u>potential</u> electrical interference and safety impact in this alternative is presented below.
D.21-11	***Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)*** Corona or gap discharges related to transmission line operation could cause localized and temporary dis-ruptions to radio, television, communications, or electronic equipment. With implementation of Mitiga-tion Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve elec-tronic interference complaints), this impact would be less than significant (Class II).	The DEIR/DEIS does not sufficiently recognize that the use of 795 Drake ACCR results in a higher conductor surface gradient than the selection of two bundled 1590 ACSR. Please make the following revisions: ***Impact EIS-1: Project could create interference with radio, television, communications, or electronic equipment (Class II)*** Corona or gap discharges related to transmission line operation could cause localized and temporary dis-ruptions to radio, television, communications, or electronic equipment. <u>The potential for corona or gap discharges operations with the Phase Build Alternative are likely greater than those expected in the project because the conductor surface gradient of the single conductor 795 ACCR would be significantly greater than the conductor surface gradient of the two bundled 1590 ACSR as designed in the Proposed Project.</u> With implementation of Mitiga-tion Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve elec-tronic interference complaints), this impact would be less than significant (Class II).
D.21-11	Corona or gap discharges related to transmission line operation could cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: Corona or gap discharges related to transmission line operation could <u>potentially</u> cause localized and temporary disruptions to radio, television, communications, or electronic equipment. With implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient) and EIS-1b (Document and resolve electronic interference complaints), this <u>potential</u> impact would be less than significant (Class II).

D.21-11	After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this impact would be less than significant (Class II).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: After the transmission line is energized, the public could be exposed to potential hazards, including shock, through induced currents on conducting objects near the transmission line. With implementation of Mitigation Measure EIS-2a (Implement grounding measures), this potential impact would be less than significant (Class II).
D.21-11	The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This impact would be less than significant. No mitigation is required (Class III).	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The function of some pacemakers could be potentially altered by exposure to electric fields that would be generated in the immediate vicinity of the project. As described above, potential electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. This potential impact would be less than significant. No mitigation is required (Class III).
D.21-12	**No Project Alternative Transmission Lines and Beaumont Substation.** Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a bio-logical need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.	To clarify that the text is addressing conductive materials, please make the following revisions: **No Project Alternative Transmission Lines and Beaumont Substation.** Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for metal fences, metal building, metal pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a bio-logical need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.
D.21-12	Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause interference with radio, television, communications or electronic equipment and induce currents or shocks that would be hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: Development of the 500 kV/220 kV transmission line from Devers to El Casco Substation would cause changes in power line field strength at the edge of the ROW. This could cause potential interference with radio, television, communications or electronic equipment and induce currents or shocks that ~~would~~ could be potential hazards. The potential for these impacts to occur is common to all high-voltage lines. Mitigation measures include limiting the conductor surface gradient as part of the design and construction process (in accordance with the IEEE Radio Noise Design Guide); documenting and resolving individual complaints of potential interference; and implementing grounding measures for fences, metal building, pipelines, etc., within and near the ROW. Another potential impact is interference with cardiac pacemakers. However, most modern pacemakers revert to a fixed-rate pacing mode during transient events. Given the rarity of an exposure event to occur simultaneously with a biological need for full function pacemakers, it would be unlikely that the transmission line's electric field would cause harmful interference to the operations of cardiac pacemakers.

D.21-13	**EIS-2a: Implement Grounding Measures.** As part of the siting and construction process, SCE shall identify objects (such as fences, metal buildings, and pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.	To clarify that the text is addressing conductive materials, please make the following revisions: **EIS-2a: Implement Grounding Measures.** As part of the siting and construction process, SCE shall identify objects (such as <u>metal</u> fences, metal buildings, and <u>metal</u> pipelines) within and near the right-of-way that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with SCE's standards. The identification of objects shall document the threshold electric field strength and metallic object size at which grounding becomes necessary.
D.21-12	No Project Alternative Option 2 would require the construction of over 40 miles of new 500 kV transmission line, following the existing Valley-Serrano 500 kV line. The alternative is described in Section C.6.3.2, and illustrated on Figure C-6b. The ROW between the Valley Substation and the Serrano Substation contains an existing 500 kV transmission line. This alternative would add a second 500 kV circuit within or adjacent to the existing ROW. Operation of this new circuit would cause changes in the power line field strength at the edge of the ROW. These changes could cause interference with radio, television, communications or electronic equipment. The new circuit could also create a hazard for workers or the public through induced currents or shocks. The function of some pacemakers could be altered by exposure to electric fields that would be generated in the immediate vicinity of the new 500 kV circuit. Electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. The potential electrical interference and electrical hazards associated with the new 500 kV circuit would not be substantially different than under existing conditions, and can be reduced through implementation of recommended mitigation described in the Proposed Project and Option 1.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: No Project Alternative Option 2 would require the construction of over 40 miles of new 500 kV transmission line, following the existing Valley-Serrano 500 kV line. The alternative is described in Section C.6.3.2, and illustrated on Figure C-6b. The ROW between the Valley Substation and the Serrano Substation contains an existing 500 kV transmission line. This alternative would add a second 500 kV circuit within or adjacent to the existing ROW. Operation of this new circuit would cause changes in the power line field strength at the edge of the ROW. These changes could cause <u>potential</u> interference with radio, television, communications or electronic equipment. The new circuit could also <u>potentially</u> create a hazard for workers or the public through induced currents or shocks. The function of some pacemakers could <u>potentially</u> be altered by exposure to electric fields that would be generated in the immediate vicinity of the new 500 kV circuit. <u>Potential</u> electrical interference with modern cardiac pacemakers is not a substantial threat to public health because most modern pacemakers are designed to revert to a fixed-rate pacing mode, which is life-sustaining. The potential electrical interference and electrical hazards associated with the new 500 kV circuit would not be substantially different than under existing conditions, and can be reduced through implementation of recommended mitigation described in the Proposed Project and Option 1.
CUMULATIVE SCENARIO AND IMPACTS		
E-13	While SCE states that it currently has no specific plans for transmission expansion in the WOD corridor, there are other regional studies that point to the potential for future development.	Please make the following revision: While SCE states that it currently has no specific plans for transmission expansion in the WOD corridor, <u>and CAISO has not studied nor identified the need for transmission expansion in the WOD corridor beyond SCE's Proposed West of Devers Upgrade Project,</u> there are other regional studies that point to the potential for future development.
E-17	Based on the information above, the CPUC and BLM have determined that a future 500 kV transmission line in the WOD corridor is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS.	Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor.
E-17	The potential future 500 kV transmission structures in that segment would likely be new tubular steel poles approximately 190 to 200 feet tall, most likely located along an existing transmission corridor.	Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor. Additionally, The assumption that a future 500 kV transmission line would likely use tubular steel poles is speculation as SCE has no specific plans for transmission expansion in the WOD corridor beyond the West of Devers Upgrade nor has CAISO studied or identified the need for which a design would be necessary. Please make the following revisions: The potential future 500 kV transmission structures in that segment would ~~likely be new tubular steel poles approximately 190 to 200 feet tall, most~~ likely <u>be</u> located along an existing transmission corridor.

E-19 through 22	Figure E-2a thru Figure E-2d	The source information for these figures should not reflect "SCE, 2014" because they were not created by SCE, but instead modified from similar figures that SCE provided. In addition, these figures show proposed 500 kV structure locations that, in some instances, improperly reflect minimum distances required between structures of other voltages or reflect the use of TSPs when LSTs may be more appropriate. Please make the following revision to the DEIR/DEIS language on all four figures. Source: Aspen, 2015. ~~SCE, 2014.~~
E-35	**Severity of Project Contribution to Cumulative Adverse Effects.** Construction and operation of the Pro-posed Project would result in adverse effects to cultural resources that would combine with the adverse effects from construction and operation of other projects in the cumulative analysis study area to result in a substantial cumulative adverse effect to cultural resources.	The DEIR/DEIS incorrectly assumes that adverse impacts to cultural resources are inevitable. Please make the following revisions: **Severity of Project Contribution to Cumulative Adverse Effects.** Construction and operation of the Pro-posed Project ~~would~~ could result in adverse effects to cultural resources. If the Proposed Project caused an adverse effect to cultural resources, ~~that would~~ combine with the adverse effects from construction and operation of other projects in the cumulative analysis study area, ~~to~~ could result in a substantial cumulative adverse effect to cultural resources.

E-46

Total Construction Emissions

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.6	0.1	0.0
Tennessee Substation	2.2	0.1	0.6	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAQMD Regional	550	75	100	150	55
Exceed SCAQMD	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.5	0.1	0.0
Tennessee Substation	2.2	0.1	0.5	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAQMD Regional	550	75	100	150	55

Please remove references to the Timoteo and Tennessee Substations.

Total Construction Emissions

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
~~Timoteo Substation~~	~~2.2~~	~~0.1~~	~~0.6~~	~~0.1~~	~~0.0~~
~~Tennessee Substation~~	~~2.2~~	~~0.1~~	~~0.6~~	~~0.0~~	~~0.0~~
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	~~3,677.3~~	~~912.2~~	~~6,839.5~~	~~486.8~~	~~290.4~~
	3,672.9	912.1	6,838.3	486.5	290.3
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
~~Timoteo Substation~~	~~2.2~~	~~0.1~~	~~0.5~~	~~0.1~~	~~0.0~~
~~Tennessee Substation~~	~~2.2~~	~~0.1~~	~~0.5~~	~~0.0~~	~~0.0~~
220 kV Transmission Line	2.259.0	525.9	3.207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	~~3,677.3~~	~~912.2~~	~~5,471.6~~	~~375.8~~	~~267.1~~
	3,672.90	912.1	5,470.50	375.6	267.00
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

E-56	**Future 500 kV Transmission Line, Cumulative Simulations, KOP#2, #4, #7, #12, #13**	Cumulative simulations were developed as part of the DEIR/DEIS and used in the analysis to make conclusions related to cumulative impacts of a future 500 kV transmission line. The development of simulations implies that there is a design that has been developed to support locations of structures within the corridor. Consistent with the prior comment, the assumption that a future 500 kV transmission line would likely use tubular steel poles is speculation as SCE has no specific plans for transmission expansion in the WOD corridor beyond the West of Devers Upgrade nor has CAISO studied or identified the need for which a design would be necessary. Simulations should not be included as part of the analysis of a speculative project as it gives a false sense of a level of detail that has not been developed. SCE cannot validate the accuracy or lack thereof for these simulations. Please see the accompanying cover letter for a detailed discussion of SCE's concerns regarding the Phased Build Alternative and potential future construction within the West of Devers corridor.
E-59	**Visual Resources Cumulative Simulation Figure E-3a** The 500 kV structures would be noticeably taller and would appear somewhat more massive compared to the lattice structures.	As it relates to the figures for the Cumulative Future 500 kV Corridor Profiles the source is stated as SCE 2014, however, SCE did not provide corridor profiles with 500 kV structures.
E-73	The geographic scope for analysis of Proposed Project adverse effects related to electrical interference and safety is the ROW for the entire length of the 220 kV transmission line. The geographic scope for this cumulative analysis is the same as for the Proposed Project, but also includes projects immediately adjacent to the 220 kV ROW. This geographic scope is appropriate because electrical interference and electrical safety hazards attenuate rapidly with distance from the transmission line, and therefore these potential adverse effects would not combine with similar adverse effects from other projects that are not within or immediately adjacent to the Proposed Project ROW.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The geographic scope for analysis of Proposed Project <u>potential</u> adverse effects related to electrical interference and safety is the ROW for the entire length of the 220 kV transmission line. The geographic scope for this cumulative analysis is the same as for the Proposed Project, but also includes projects immediately adjacent to the 220 kV ROW. This geographic scope is appropriate because <u>potential</u> electrical interference and electrical safety hazards attenuate rapidly with distance from the transmission line, and therefore these potential adverse effects would not combine with similar <u>potential</u> adverse effects from other projects that are not within or immediately adjacent to the Proposed Project ROW.
E-73 through 74	The past, present, and reasonably foreseeable projects that contribute or would contribute to electrical interference and electrical safety hazards within the cumulative analysis study area are limited generally to electrical transmission lines. Several transmission lines currently exist in the Proposed Project corridor, and these past projects contribute to the existing baseline for electrical interference in the study area. Other transmission lines in the region also create electrical interference, but those other regional transmission lines are outside of the cumulative analysis study area because electrical interference from transmission lines attenuates rapidly with distance and would not combine with the potential adverse effects of the Proposed Project. The only project within the cumulative projects study area that could combine with the Proposed Project to result in a cumulative adverse effect is the future 500 kV trans-mission line, which could result in an increase in electrical interference and electrical safety hazards. This cumulative analysis has determined that a future 500 kV transmission line is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS. The line would be built in SCE's existing ROW and along about 40 miles of the 45-mile project ROW. The future 500 kV line could be single-circuit or double-circuit, and for the purpose of this study, it is assumed to be a double-circuit line. Construction and operation of the Proposed Project would result in minor adverse effects related to electrical interference and electrical safety hazards. These potential adverse effects could combine with the adverse effects on electrical interference and safety from the future 500 kV transmission line to result in a cumulative adverse effect.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: The past, present, and reasonably foreseeable projects that contribute or ~~would~~ <u>could</u> contribute to <u>potential</u> electrical interference and electrical safety hazards within the cumulative analysis study area are limited generally to electrical transmission lines. Several transmission lines currently exist in the Proposed Project corridor, and these past projects contribute to the existing baseline for <u>potential</u> electrical interference in the study area. Other transmission lines in the region also create <u>potential</u> electrical interference, but those other regional transmission lines are outside of the cumulative analysis study area because <u>potential</u> electrical interference from transmission lines attenuates rapidly with distance and would not combine with the potential adverse effects of the Proposed Project. The only project within the cumulative projects study area that could combine with the Proposed Project to result in a cumulative <u>potential</u> adverse effect is the future 500 kV trans-mission line, which could <u>potentially</u> result in an increase in electrical interference and electrical safety hazards. This cumulative analysis has determined that a future 500 kV transmission line is foreseeable, and therefore should be evaluated as a cumulative project in this EIR/EIS. The line would be built in SCE's existing ROW and along about 40 miles of the 45-mile project ROW. The future 500 kV line could be single-circuit or double-circuit, and for the purpose of this study, it is assumed to be a double-circuit line. Construction and operation of the Proposed Project ~~would~~ <u>could</u> result in <u>potential</u> minor adverse effects related to electrical interference and electrical safety hazards. These potential <u>minor</u> adverse effects could combine with the <u>potential</u> adverse effects on electrical interference and safety from the future 500 kV transmission line to result in a cumulative <u>potential</u> adverse effect.

E-74	Construction and operation of the Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could create: interference with radio, television, communications, or electronic equipment; hazards to the public from project-induced currents or shocks; and, interference with cardiac pacemakers. The only other project within the cumulative projects study area that could result in adverse effects related to electrical interference and safety is the future 500 kV transmission line. Although the future 500 kV transmission line would be geo-graphically contiguous with the majority of the Proposed Project, the construction schedule for the future transmission line would not overlap with the construction schedule of the Proposed Project. There-fore, construction-related adverse effects to electrical interference and safety from the Proposed Project would not combine with construction-related adverse effects to electrical interference and safety from the future transmission line to result in a cumulative effect. However, the operational adverse effects of the future transmission line could combine with the operational adverse effects of the Proposed Project to result in a cumulative adverse effect. Overall, construction and operation of the Proposed Project would result in minor adverse effects related to electrical interference and safety, and the incremental contribution of the Proposed Project to the cumulative adverse effect would be similarly minor. The severity of the Proposed Project potential adverse effects related to electrical interference and safety, as well as the incremental contribution of the Proposed Project to the cumulative adverse effect, would be reduced through implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient), EIS-1b (Document and resolve electronic interference complaints), and EIS-2a (Implement grounding measures). These mitigation measures are fully described in Section D.21. With implementation of the mitigation measures noted above and described fully in Section D.21, the incremental contribution of the Proposed Project to the adverse cumulative effect would be negligible.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: Construction and operation of the Proposed Project would cause changes in power line field strength as the locations of energized conductors would change during construction and in the final configuration of the transmission lines after construction is complete. These changes in field strength at the edge of the ROW could create: interference with radio, television, communications, or electronic equipment; hazards to the public from project-induced currents or shocks; and, interference with cardiac pacemakers. The only other project within the cumulative projects study area that could result in <u>potential</u> adverse effects related to electrical interference and safety is the future 500 kV transmission line. Although the future 500 kV transmission line would be geo-graphically contiguous with the majority of the Proposed Project, the construction schedule for the future transmission line would not overlap with the construction schedule of the Proposed Project. Therefore, construction-related <u>potential</u> adverse effects to electrical interference and safety from the Proposed Project would not combine with construction-related <u>potential</u> adverse effects to electrical interference and safety from the future transmission line to result in a cumulative effect. However, the operational <u>potential</u> adverse effects of the future transmission line could combine with the operational <u>potential</u> adverse effects of the Proposed Project to result in a cumulative <u>potential</u> adverse effect. Overall, construction and operation of the Proposed Project ~~would~~ <u>could</u> result in <u>potential</u> minor adverse effects related to electrical interference and safety, and the incremental contribution of the Proposed Project to the cumulative <u>potential</u> adverse effect would be similarly minor. The severity of the Proposed Project potential adverse effects related to electrical interference and safety, as well as the incremental contribution of the Proposed Project to the cumulative <u>potential</u> adverse effect, would be reduced through implementation of Mitigation Measures EIS-1a (Limit the conductor surface gradient), EIS-1b (Document and resolve electronic interference complaints), and EIS-2a (Implement grounding measures). These mitigation measures are fully described in Section D.21. With implementation of the mitigation measures noted above and described fully in Section D.21, the incremental contribution of the Proposed Project to the <u>potential</u> adverse cumulative effect would be negligible.
E-74	Operation of the Proposed Project would combine with the impacts from construction and operation of the future 500 kV transmission line to result in a significant cumulative impact related to electrical interference and safety. Without the implementation of mitigation, the incremental contribution of the Proposed Project to the significant cumulative impact would be cumulatively considerable. However, with implementation of mitigation measures noted above and described fully in Section D.21, the contribution of the Proposed Project to the significant electrical interference and safety cumulative impact would be less than cumulatively considerable.	As there is no evidence that existing or proposed transmission lines have electrical interference or electrical safety hazards, please make the following revisions: Operation of the Proposed Project ~~would~~ <u>could</u> combine with the impacts from construction and operation of the future 500 kV transmission line to result in a <u>potentially</u> significant cumulative impact related to electrical interference and safety. Without the implementation of mitigation, the incremental contribution of the Proposed Project to the <u>potentially</u> significant cumulative impact would be cumulatively considerable. However, with implementation of mitigation measures noted above and described fully in Section D.21, the contribution of the Proposed Project to the <u>potentially</u> significant electrical interference and safety cumulative impact would be less than cumulatively considerable.

E-75	**E-4 Comparison of Alternatives** All of the retained alternatives are located in the same ROW as the Proposed Project and would involve similar types of construction activities. The same list of cumulative projects that could potentially com-bine with the Proposed Project to result in a cumulative adverse effect would also apply to all of the retained alternatives. Therefore, the cumulative analysis presented above for the Proposed Project would also apply to all of the alternatives, and the adverse cumulative effects that are described for the Pro-posed Project would also occur with all of the alternatives.	The description provided in the Phased Build Alternative (Section C.4.3 and Figure C-5) indicates that the existing double-circuit towers in Segment 6 would remain as-is. Given that those structures are already located at the northern edge of the ROW in this segment, any 'future phase' that would consist of installing a single- or double-circuit 500kV or 220kV line in the vacant space remaining in the ROW would have to be built in the "center" position. This would increase complexity in both terminating that project into Devers Substation (either at 500kV or 220kV switchracks), as well as creating additional crossovers in the Banning Junction, El Casco, and/or San Bernardino Junction area. Such crossovers are not sufficiently incorporated into the alternative project description regarding the location of the future 500kV structures. And because no figures similar to Figures E-2a through E-2d were provided anywhere within the DEIR/DEIS to reflect these orientation details, there is no basis to conclude that the Phase Build Alternative would have similar cumulative impacts, because that latter phase would involve additional construction complexities, including, but not limited to, additional crossovers that would not be necessary if the project were constructed as designed by SCE (*i.e*. the Proposed Project). Please make the following revisions: All of the retained alternatives are located in the same ROW as the Proposed Project and would involve similar types of construction activities<u>, with the exception of the Phased Build Alternative, which would result in greater construction disturbances for the subsequent set of circuits than the Proposed Project</u>. The same list of cumulative projects that could potentially com-bine with the Proposed Project to result in a cumulative adverse effect would also apply to all of the retained alternatives. Therefore, the cumulative analysis presented above for the Proposed Project would also apply to all of the alternatives, and the adverse cumulative effects that are described for the Pro-posed Project would also occur with all of the alternatives <u>with the exception of the Phased Build Alternative, which would result in greater cumulative effects due to the subsequent set of circuits than the Proposed Project</u>.
OTHER CEQA AND NEPA REQUIREMENTS		
F-7	**Cultural Resources** – Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains	This section is listed under the section "Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented." The analysis in this section conflicts with the analysis in Section D.7. Section D.7 does not find cultural impacts to be significant and unavoidable, therefore, this discussion should be deleted from this section.
F-7	**Cultural Resources** – Impact CL-2: Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains.	The DEIR/DEIS incorrectly assumes adverse impacts. SCE recommends the following edits: **Cultural Resources** – Impact CL-2: Construction, operation and maintenance, and restoration ~~would~~ <u>could</u> cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains.
F-8	**Visual Resources** – Impact VR-2: Construction would result in visual contrast due to vegetation removal. – Impact VR-9: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality.	Evidence has not been presented to support the conclusion that these impacts is significant and unavoidable nor has evidence been provided to support the conclusion that mitigation would not reduce the impact to less than significant levels. These impacts should be changed from Class I to Class II.

COMPARISON OF ALTERNATIVES

G-6

The Proposed Project in would have 4 significant (Class I) impacts for the 66 kV subtransmission line component. The first 3 impacts would occur for all proposed or alternative segments, but Impact VR-8 results specifically from the 1,600 feet of proposed overhead 66 kV subtransmission along Iowa Street in the City of Redlands. The Iowa Street 66 kV Underground Alternative would mitigate Impact VR-8 to less than significant levels.

SCE's comments to the Visual Resources section of the DEIR/DEIS indicated that Figure D-18-25B improperly simulates the installation of double-circuit 220kV TSPs (with a typical as shown in Figure B-10), instead of the correct use of single-circuit 66 kV wood poles (with typical as shown in Figure B-14b). If this simulation had incorporated the correct structure type, it would show that the Proposed Project creates a similar visual impact as the "single, wood-pole utility lines along Orange Avenue and a portion of Iowa Street" and the "…vertical street light poles and a more distant communication tower." (See DEIR page D.18-24, KOP-18, Visual Quality.), therefore the significant impact would not warrant the need for the underground alternative as there would be no impact to mitigate. As such the comparison of this underground alternative to the Proposed Project, as seen in Table G-3, indicates that if not for the incorrect conclusion that this alternative was preferred for visual the Proposed Project is preferred for all other resource areas and, therefore, this alternative should be deleted from further consideration and/or Table G-2 should incorporate the following revisions.

Issue Area	Proposed Project	Iowa 66 kV Underground Alternative
Climate Change	~~No preference~~ Preferred	~~No preference~~ Greater construction impacts due to need for trenching
Visual Resources	~~Significant and unmitigable long-term visual impacts from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands~~ No preference	~~Preferred Elimination of overhead segment in residential neighborhood reduces long-term impact to less than significant levels~~ No Preference

<table>
<tr>
<td>G-5</td>
<td>Table G-2. Comparison of the Proposed Project to Tower Relocation

<table>
<tr><td>Land Use and BLM Realty</td><td>Greater disturbance of sensitive receptors (residences) during both construction and operation</td><td>Preferred
Even though construction timeframe would be longer</td></tr>
</table>
</td>
<td>Both the Proposed Project and the Tower Relocation Alternative result in Class II impacts. The Comparison states that the Proposed Project disturbance would be greater during both construction and operation. However, when compared to the tower relocation alternative, the construction timeframe would be longer for that alternative. The analysis does not support that the Tower Relocation Alternative would be preferred; therefore, the text should be modified to reflect no preference:

<table>
<tr><td>Land Use and BLM Realty</td><td><s>Greater disturbance of sensitive receptors (residences) during both construction and operation</s>

<u>No Preference</u></td><td><s>Preferred
Even though construction timeframe would be longer</s>

<u>No Preference</u></td></tr>
</table>
</td>
</tr>
<tr>
<td>G-6</td>
<td>Table G-2. Comparison of the Proposed Project to Tower Relocation
<table>
<tr><td>Visual Resources</td><td>Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation</td><td>Preferred Visual impacts less than significant due to greater distance of towers from residences</td></tr>
</table>
</td>
<td>A decrease in visual impacts for the Tower Relocation Alternative has not been demonstrated by the DEIR/DEIS analysis, especially as the alternative does not include any visual simulations, nor is there a basis for concluding that this slight shift in structure location would be perceptible, therefore the text should be modified to reflect no preference.
<table>
<tr><td>Visual Resources</td><td><s>Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation</s>

<u>No preference</u></td><td><s>Preferred Visual impacts less than significant due to greater distance of towers from residences</s>

<u>No Preference</u></td></tr>
</table>
</td>
</tr>
<tr>
<td>G-8</td>
<td>G.4.3 Phased Build Alternative</td>
<td>Please see SCE's accompanying cover letter for concerns related to the DEIR/DEIS's characterization of optional future phases to the WOD Upgrade Project. The concerns raised in the accompanying cover letter demonstrate that the analysis included in this section comparing the Phased Build Alternative to the Proposed Project is deficient and conclusions related to the Phase Build Alternative being preferred to the Proposed Project are unsubstantiated.</td>
</tr>
</table>

G-8 through G-9	**G.4.3 Phased Build Alternative**	Table G-4 of the Draft EIR/EIS identifies the Phased Build Alternative as the preferred alternative for the following resource areas: • Air Quality • Cultural Resources • Geology and Soils • Land Use and BLM Realty • Noise • Paleontological Resources • Transportation and Traffic • Visual Resources • Water Resources and Hydrology. The Draft EIR/EIS, though, fails to adequately describe all the construction features for the Phased Build Alternative that if taken into account would likely lead to minimal differences for these resource areas. Moreover, impacts for these resource areas would only be potentially less than the Proposed Project because the full environmental impacts of the Phased Build Alternative were not evaluated, including additional ground disturbance that would be required to avoid construction work area constraints due to the presence of the adjacent towers that would not be removed. Please see SCE's accompanying cover letter demonstrating that the analysis included in this section comparing the Phased Build Alternative to the Proposed Project is deficient and conclusions related to the Phase Build Alternative being preferred to the Proposed Project are unsubstantiated.
G-8 through G-9	**G.4.3 Phased Build Alternative**	Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed: Air Quality The future portion of the Phased Build Alternative will require construction activities to occur throughout the entire WOD ROW. These construction activities will generate dust and exhaust emissions of criteria pollutants and toxic air contaminants in a quantity roughly equal to that estimated for the Alternative. Conservatively, it is likely that construction-related air quality impacts for the Phased Build Alternative plus the future portion of the Phased Build Alternative will be greater than the air quality impacts for the Proposed Project (e.g., fugitive dust related to greater areas of ground disturbance under the Phase Build Alternative). Cultural Resources The Draft EIR/EIS assumes that because one set of transmission structures is not removed for the Phased Build Alternative that the Alternative would result in reduced impacts to buried prehistoric and historical archaeological sites or buried Native American human remains compared to the Proposed Project. However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line as well as additional ground disturbance due to construction work area constraints, the perceived reduction in impacts to cultural resources for the Phased Build Alternative is merely a deferral of potential impacts. Because both 220kV transmission lines are ultimately rebuilt under the Phased Build Alternative, the full impact to Cultural Resources is equivalent to or greater than those for the Proposed Project.

G-8 through G-9	**G.4.3 Phased Build Alternative**	Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed (cont): Geology and Soils The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Geology and Soils are less for that alternative than for the Proposed Project. However, because the future portion of the Phased Build Alternative will require construction activities through the entire WOD ROW, including removal and construction of transmission structures in Segments 1, 2, 3, 4, and 6 and greater ground disturbance due to constrained work area, the full impacts related to Geology and Soils for the Phased Build Alternative are equivalent to or greater than those for the Proposed Project. Land Use and BLM Realty The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Land Use and BLM Realty are less for that alternative than for the Proposed Project. However, because the future portion of the Phased Build Alternative will require construction activities through the entire WOD ROW, including removal and construction of transmission structures in Segments 1, 2, 3, 4, and 6 and greater ground disturbance due to constrained work area, the full impacts related to Land Use and BLM Realty for the Phased Build Alternative are at least equivalent to those for the Proposed Project. In fact, because the Phased Build Alternative would require that SCE cross tribal land to remove conductor from the reused transmission structures and again to reconductor the new transmission structures, there is the potential for Land Use and BLM Realty impacts from the full Phased Build Alternative to be greater than the impacts from the Proposed Project.

G-8 through G-9	**G.4.3 Phased Build Alternative**	Relative to those resources for which the DEIR finds the Phased Build Alternative to be Preferred, the following should be addressed (cont): Noise The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Noise are less for that alternative than for the Proposed Project. While it may be possible that noise impacts for the immediate portion of the Phased Build Alternative are less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW that would result in similar impacts being experienced by sensitive receptors for a second time. Paleontological Resources The Draft EIR/EIS assumes that because one set of transmission structures is not removed for the Phased Build Alternative that the Alternative would result in reduced impacts to paleontological resources compared to the Proposed Project. However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line, the perceived reduction in impacts to paleontological resources for the Phased Build Alternative is merely a deferral of potential impacts. Because both 220 kV transmission lines are ultimately rebuilt under the Phased Build Alternative, the full impact to Paleontological Resources is equivalent to or greater than those for the Proposed Project because of the additional ground disturbance required to address constrained work area. Transportation and Traffic The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Transportation and Traffic are less for the Alternative than for the Proposed Project. While it may be possible that traffic impacts for the immediate portion of the Phased Build Alternative are less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW that would result in similar impacts occurring again in as little as 10 years.

<table>
<tr>
<td>G-8 through G-9</td>
<td>G.4.3 Phased Build Alternative</td>
<td>Relative to those resources for which the DEIR/DEIS finds the Phased Build Alternative to be Preferred, the following should be addressed (cont):

Visual Resources
The Draft EIR/EIS states that impacts to visual resources for the Phased Build Alternative would be "less than significant due to greater distances of towers from residences," compared to "significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation for the Proposed Project." However, because the future portion of the Phased Build Alternative does require removal and replacement of the second 220kV transmission line, the perceived reduction in impacts to visual resources for the Phased Build Alternative is primarily a deferral of potential impacts. Sensitive receptors of the WOD ROW would experience visual impacts related to construction twice – once for initial construction of the Phased Build Alternative and again for the future construction of the Phased Build Alternative.

Water Resources
The Draft EIR/EIS assumes that because the Phased Build Alternative does not remove the second 220kV transmission line initially that impacts related to Water Resources and Hydrology are less for that alternative than for the Proposed Project, presumably because less water is needed for construction activities under the Phased Build Alternative. While it may be possible that water needs for the immediate portion of the Phased Build Alternative is less than the Proposed Project, full implementation of the Phased Build Alternative would require construction throughout the WOD ROW for a second time. Additionally, greater ground disturbance would be necessary to address work area constraints during construction. Conservatively, it is likely that construction-related water needs for the Phased Build Alternative plus the construction-related water needs for the future portion of the Phased Build Alternative would be greater than the construction-related water needs for the Proposed Project.

Other Resource Areas
Generally, the same assessment that applies to the resource areas identified above applies to the remainder of the resource areas analyzed in the Draft EIR/EIS.</td>
</tr>
<tr>
<td>G-9</td>
<td>The Phased Build Alternative is preferred over the Proposed Project because it would mitigate operational impacts (visual presence of the Proposed Project closer to the south edge of the ROW in Segments 4 and 6 and from the 66 kV line along Iowa Street) to less than significant levels.

Table G-4. Comparison of the Proposed Project to Phased Build Alternative

<table>
<tr><td></td><td>No preference</td><td>No preference</td></tr>
<tr><td>Visual Resources</td><td>Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation</td><td>Preferred
Visual impacts less than significant due to greater distance of towers from residences and elimination</td></tr>
</table>
</td>
<td>The document should indicate no preference between the Phased Build Alternative and the Proposed Project with respect to visual resources. As such, please make the following revisions:

The Phased Build Alternative is <u>not</u> preferred <u>for visual reasons</u>

Table G-4. Comparison of the Proposed Project to Phased Build Alternative
<table>
<tr><td>Visual Resources</td><td><s>Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation</s>

<u>No preference</u></td><td><s>Preferred
Visual impacts less than significant due to greater distance of towers from residences and elimination</s>

<u>No preference</u></td></tr>
</table>
</td>
</tr>
</table>

MITIGATION MONITORING AND REPORTING		
H-3	When a mitigation measure requires that a study or plan be developed during the design or pre-construction phase of the project, SCE must submit the final study or plan to CPUC and BLM for review and approval. Any study or plan that requires approval of the CPUC and BLM must allow at least 60 days for adequate review. Other agencies and jurisdictions with authority over aspects of the project or par-ticular resources may require additional review time. It would be the responsibility of the CPUC/BLM environmental monitoring team to confirm that appropriate opportunities for agency reviews have occurred and required approvals obtained.	Review time may be more or less than that referenced, depending on the complexity of a given plan. As such, please make the following revisions: When a mitigation measure requires that a study or plan be developed during the design or pre-construction phase of the project, SCE must submit the final study or plan to CPUC and BLM for review and approval. Any study or plan that requires approval of the CPUC and BLM must allow ~~at least 60 days~~ adequate time for ~~adequate~~ review. Other agencies and jurisdictions with authority over aspects of the project or par-ticular resources may require additional review time. It would be the responsibility of the CPUC/BLM environmental monitoring team to confirm that appropriate opportunities for agency reviews have occurred and required approvals obtained.
H.3 through H-4	If a project change would create or have the potential to create a new significant impact, increase the severity of an impact, or occur outside the geographic area evaluated in the EIR/EIS, the Applicant would be required to submit a PFM.	To clarify that minor project additions (e.g. a new construction yard) that would not result in significant impacts would not require a PFM, please make the following revisions: If a project change would create or have the potential to create a new significant impact or~~,~~ increase the severity of an impact, ~~or occur outside the geographic area evaluated in the EIR/EIS,~~ the Applicant would be required to submit a PFM.
H-5	□□**Step 1.** Disputes and complaints (including those from the public) should be directed first to the CPUC and/or BLM's Project Manager or designee, as appropriate, for resolution. The Project Manager or designee would attempt to resolve the dispute.	To ensure consistency between the Dispute Resolution procedures and Mitigation Measure "LU-1a Prepare construction notification plan". Per "LU-1a Prepare construction notification plan", the following edits are suggested: **Step 1.** Disputes and complaints (including those from the public) ~~should~~ be directed first to SCE ~~to the CPUC and/or BLM's Project Manager or designee, as appropriate,~~ for resolution. ~~The Project Manager or designee would attempt to resolve the dispute.~~ SCE will attempt to resolve the dispute. If the dispute or complaint is resolved by SCE no further action or escalation is needed. If SCE is not able to resolve a dispute or complaint, SCE will direct those to the CPUC and/or BLM's Project Manager or designee, as appropriate, for resolution.
H-6	Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.	SCE contracts for construction require compliance with all project mitigation measures and all workers will be required by additional mitigation measures to undergo WEAP training; environmental information is provided at construction tailboards, and lastly, construction is monitored to ensure that measures are complied with. The additional requirement is thus unnecessary, please make the following edits: Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. ~~Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.~~
H-6	The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports would be made available for public inspection by the CPUC and BLM on request. The CPUC, the BLM, and SCE would develop a filing and tracking system	To clarify that this does not require additional reporting by SCE, please make the following revision: The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports prepared by the CPUC and BLM, or officially transmitted to the CPUC and BLM by SCE, would be made available for public inspection by the CPUC and BLM on request. The CPUC, the BLM, and SCE would develop a filing and tracking system.

APPENDIX 1 PROJECT DESCRIPTION INFORMATION

Ap. Various Pages	Table Ap.1A-1. Structure Heights	Please see attached file "WODUP_TableAp 1A-X_StructureHeights_Rev A09-11-15.xls" for updates to Appendix 1 structure heights (all segments)
Ap. Various Pages	Appendix 1B FAA Hazard Marking Evaluation	Please see attached file "WODUP_ Appendix 1B_FAA Hazard Marking Evaluation_Rev.xls" (all segments)
Ap. Various	Table Ap.18-2. Preliminary FAA Evaluation	Please see attached file "WODUP_Prelim FAA Determination_Rev.xls" (all segments)
Ap.1C-3 through 4	Tennessee Substation *Civil* 3-4 ¾-Ton Crew Cab 4×4 275 Gas 1 4 2 Dump Trucks 350 Diesel 1 1 2 4 Backhoe 125 Diesel 1 2 6 *Electrical* 5 Manlifts/Bucket Truck 250 Diesel 1 10 6 Boom/ Crane Truck 180 Diesel 1 3 4 ¾-Ton Crew Cab 4×4 275 Gas 1 14 2 Forklift 75 Diesel 1 8 4 *Maintenance* 4 Checker/ Truck 180 Gas/Diesel 1 14 2 ¾-Ton Crew Cab 4×4 275 Gas 1 2 2 Gas/Processing Trailer 0 Electric 1 1 6 *Test* 2 Utility Truck 180 Gas 1 8 2	Please remove the following references to the Tennessee Substation: ~~Tennessee Substation~~ ~~*Civil*~~ ~~3-4~~ ~~¾-Ton Crew Cab 4×4~~ ~~275~~ ~~Gas~~ ~~1~~ ~~4~~ ~~2~~ ~~Dump Trucks~~ ~~350~~ ~~Diesel~~ ~~1~~ ~~1~~ ~~2~~ ~~4~~ ~~Backhoe~~ ~~125~~ ~~Diesel~~ ~~1~~ ~~2~~ ~~6~~ ~~*Electrical*~~ ~~5~~ ~~Manlifts/Bucket Truck~~ ~~250~~ ~~Diesel~~ ~~1~~ ~~10~~ ~~6~~ ~~Boom/ Crane Truck~~ ~~180~~ ~~Diesel~~ ~~1~~ ~~3~~ ~~4~~ ~~¾-Ton Crew Cab 4×4~~ ~~275~~ ~~Gas~~ ~~1~~ ~~14~~ ~~2~~ ~~Forklift~~ ~~75~~ ~~Diesel~~ ~~1~~ ~~8~~ ~~4~~ ~~*Maintenance*~~ ~~4~~ ~~Checker/ Truck~~ ~~180~~ ~~Gas/Diesel~~ ~~1~~ ~~14~~ ~~2~~ ~~¾-Ton Crew Cab 4×4~~ ~~275~~ ~~Gas~~ ~~1~~ ~~2~~ ~~2~~ ~~Gas/Processing Trailer~~ ~~0~~ ~~Electric~~ ~~1~~ ~~1~~ ~~6~~ ~~*Test*~~ ~~2~~ ~~Utility Truck~~ ~~180~~ ~~Gas~~ ~~1~~ ~~8~~ ~~2~~

Ap.1C-4		As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Timoteo Substation							
Civil					3-8		
Auger Truck	210		Diesel	1	2	66	44
¾-Ton Crew Cab 4×4	275	Gas		1		8	2
Boom/Crane Truck	180		Diesel	1	2	66	44
Dump Trucks	350		Diesel	1	1	4	4
Backhoe	125		Diesel	1		4	6
Forklift	75		Diesel	1		88	44
Ditch Digger	75		Diesel	1		55	66
Electrical					7-10		
Manlifts/Bucket Truck	250		Diesel	1		20	6
Boom/ Crane Truck	180		Diesel	1	2	6	4
¾-Ton Crew Cab 4×4	275	Gas		1		25	2
Ditch Digger	75		Diesel	1	1	10	66
Forklift	75		Diesel	1		10	4
Maintenance					3		
Checker/Truck	180		Gas/Diesel	1		25	2
¾-Ton Crew Cab 4×4	275	Gas		1		4	2
Gas/Processing Trailer	0		Electric	1		2	6
Test					2		
Utility Truck	180	Gas		1		15	2

~~Timoteo Substation~~							
~~*Civil*~~					~~3-8~~		
~~Auger Truck~~	~~210~~		~~Diesel~~	~~1~~	~~2~~	~~66~~	~~44~~
~~¾-Ton Crew Cab 4×4~~	~~275~~	~~Gas~~		~~1~~		~~8~~	~~2~~
~~Boom/Crane Truck~~	~~180~~		~~Diesel~~	~~1~~	~~2~~	~~66~~	~~44~~
~~Dump Trucks~~	~~350~~		~~Diesel~~	~~1~~	~~1~~	~~4~~	~~4~~
~~Backhoe~~	~~125~~		~~Diesel~~	~~1~~		~~4~~	~~6~~
~~Forklift~~	~~75~~		~~Diesel~~	~~1~~		~~88~~	~~44~~
~~Ditch Digger~~	~~75~~		~~Diesel~~	~~1~~		~~55~~	~~66~~
~~*Electrical*~~					~~7-10~~		
~~Manlifts/Bucket Truck~~	~~250~~		~~Diesel~~	~~1~~		~~20~~	~~6~~
~~Boom/ Crane Truck~~	~~180~~		~~Diesel~~	~~1~~	~~2~~	~~6~~	~~4~~
~~¾-Ton Crew Cab 4×4~~	~~275~~	~~Gas~~		~~1~~		~~25~~	~~2~~
~~Ditch Digger~~	~~75~~		~~Diesel~~	~~1~~	~~1~~	~~10~~	~~66~~
~~Forklift~~	~~75~~		~~Diesel~~	~~1~~		~~10~~	~~4~~
~~*Maintenance*~~					~~3~~		
~~Checker/Truck~~	~~180~~		~~Gas/Diesel~~	~~1~~		~~25~~	~~2~~
~~¾-Ton Crew Cab 4×4~~	~~275~~	~~Gas~~		~~1~~		~~4~~	~~2~~
~~Gas/Processing Trailer~~	~~0~~		~~Electric~~	~~1~~		~~2~~	~~6~~
~~*Test*~~					~~2~~		
~~Utility Truck~~	~~180~~	~~Gas~~		~~1~~		~~15~~	~~2~~

APPENDIX 5 ALTERNATIVES SCREENING REPORT		
Ap.5-3	Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;	As a result of additional engineering analysis the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. ~~Upgrade substation equipment at Timoteo and Tennessee Substations to accommodate 66 kV sub-transmission line relocations;~~

Ap.5-19 To Ap.5-42	4.2 Tower Relocation Alternative	In several instances, the descriptions included Section 4.2 related to project objectives, feasibility, impacts and environmental advantages and disadvantages are inconsistent with information SCE submitted in response to several Energy Division data requests. SCE's concerns are noted below and SCE requests for this section to be updated based on these concerns. In describing how this alternative would meet Basic Project Objective 2, the DEIR/DEIS errs by stating that the Tower Relocation Alternative could require a few additional months of construction and that this alternative would not affect California's meeting the RPS. As explained in SCE's responses to data requests ALT-15A and ALT-17D, this alternative would extend the overall project schedule by at least 12 months (as opposed to only a few months) and as indicated in the responses (attached to ALT-17D) received from generators, a delay beyond 2020 would adversely impact generation development. Impairment of generation development could affect utilities' ability to meet the State's RPS. Regarding feasibility, the DEIR/DEIS does not adequately describe the potential legal and regulatory factors that could deem this alternative infeasible, including the contractual and legal obligations included in the SCE-Morongo agreements and the extended schedule. Regarding technical feasibility, the DEIR/DEIS omits information provided by SCE that explained how shifting structures 50 feet farther from residences in Segments 4 and 6 would not allow for the most efficient and safe working environment for the construction of these towers. While this alternative is not technically infeasible, the DEIR/DEIS should explain how this alternative is less safe to build than SCE's Proposed Project and how future projects in these areas would also be less safe construct as compared to SCE's Proposed Project. Regarding construction timeframe, the DEIR/DEIS should explain how this alternative will increase the project schedule by at least 12 months and how this delay could adversely impact generation development, consistent with SCE's responses to data requests ALT-15A and ALT-17D. In describing the environmental advantages and disadvantages, the DEIR/DEIS overstates the environmental advantages and understates the environmental disadvantages for this alternative. There is no tangible evidence in the form of either simulations or mapped analyses that have been provided to support the conclusions that the Proposed Project would have substantial visual impacts on views from residences on the south side of the alignment and that the Tower Relocation Alternative would reduce the severity of those impacts. Additionally, impacts related to construction disturbance including, for example, temporary visual impacts, air quality emissions, and noise would all be greater for the Tower Relocation Alternative than SCE's Proposed Project. As SCE explained in response to data request ALT-15A, the construction efforts necessary for relocating towers in Segments 4 and 6 would be significantly extended, because SCE would have to initially build the new southern tower line, string those two new circuits, and then return to the same areas again to perform similar construction activities, such as foundation construction, tower assembly and erection and line stringing, for the second (northern) tower line. Also, given that it would be more difficult to obtain the necessary double-line outages, it would be much more likely that installation of additional shoo-fly facilities would be necessary through these two Segments. As such, , these activities would increase all construction-related impacts including, for example, temporary visual impacts, air quality emissions and noise for the Tower Relocation Alternative as compared to SCE's Proposed Project.
Ap.5-46 to Ap.5-56	4.4 Phased Build Alternative	Please see SCE's accompanying cover letter and attachments for concerns related to the Phased Build Alternative, more specifically, feasibility, and the ability for this alternative to meet project objectives, the increased environmental impacts, the increased schedule impact, and the increased costs.

APPENDIX 6 AIR QUALITY

E-3

Modifications to Existing Substations (Upgrades)
Substation Cut/Fill Grading and Surface Improvements

Substation		Task			Materials		
Approximate Surface Area (sqft)		Approximate volume (cuyd)					
Substation equipment foundations, cut			1,109	108	Concrete	Acres	0.1
Devers Substation	Substation eq	Concr	931		1	PM	0.
	Site Fill	Soil	177	-		PM	0
	Site Cut	Soil	-		9		
El Casco	Substation	Concr	770		4	Acres	0
	Substation	Concr	910		5	PM	0.
	Site Cut	Soil	140		8	PM	0
Vista	Substation	Concr	1,109		1	Acres	0
	Substation eq	Concr	931		1	PM	0.
	Site Fill	Soil	125	-		PM	0
San	Substation eq	Concr		2,797	3	Acres	0
	Substation eq	Concr	1,558		2	PM	1
	Site Fill	Soil	1,239		5	PM	0.
Timoteo	Substation	Concr	68		4	Acres	0.
	Substation	Concr	60		3	PM	0.
	Site Fill	Soil	8		1	PM	0.
Tennessee	Substation	Concr	25	2		Acres	0
	Substation	Concr	30	2		PM	0.
	Site Cut	Soil	5			PM	0.
						2.5/	0

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.
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Devers Substation	Substation		Concrete	931	199	PM10/day	0.5
	Site Fill	Soil		177	-	PM2.5/day	0.1
	Site Cut	Soil		-	92		
El Casco	Substation		Concrete	770	43	Acres	0.0
	Substation		Concrete	910	51	PM10/day	0.4
	Site Cut	Soil		140	8	PM2.5/day	0.1
Vista	Substation		Concrete	1.109	108	Acres	0.0
	Substation		Concrete	931	199	PM10/day	0.5
	Site Fill	Soil		125	-	PM2.5/day	0.1
San	Substation		Concrete	2.797	322	Acres	0.1
	Substation		Concrete	1,558	255	PM10/day	1.3
	Site Fill	Soil		1,239	57	PM2.5/day	0.3
~~Timoteo~~	~~Substation~~		~~Concrete~~	~~68~~	~~4~~	~~Acres~~	~~0.0~~
	~~Substation~~		~~Concrete~~	~~60~~	~~3~~	~~PM10/day~~	~~0.0~~
	~~Site Fill~~	~~Soil~~		~~8~~	~~1~~	~~PM2.5/day~~	~~0.0~~
~~Tennessee~~	~~Substation~~		~~Concrete~~	~~25~~	~~2~~ ~~Acres~~		~~0.0~~
	~~Substation~~		~~Concrete~~	~~30~~	~~2~~	~~PM10/day~~	~~0.0~~
	~~Site Cut~~	~~Soil~~		~~5~~		~~PM2.5/day~~	~~0.0~~

E-7

Modifications to Existing Substations (Upgrades)

Construction Equipment and Workforce Estimates

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

E-46

Total Construction Emissions

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.6	0.1	0.0
Tennessee Substation	2.2	0.1	0.6	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
Timoteo Substation	2.2	0.1	0.5	0.1	0.0
Tennessee Substation	2.2	0.1	0.5	0.0	0.0
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	31.4	2.6	1.6
El Casco Substation	16.3	3.7	28.8	2.0	1.3
Vista Substation	17.0	3.7	28.9	2.2	1.3
San Bernardino Substation	19.4	4.3	31.4	4.1	2.0
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
~~Timoteo Substation~~	~~2.2~~	~~0.1~~	~~0.6~~	~~0.1~~	~~0.0~~
~~Tennessee Substation~~	~~2.2~~	~~0.1~~	~~0.6~~	~~0.0~~	~~0.0~~
220 kV Transmission Line	2,259.0	525.9	4,009.0	243.4	156.0
Shoo-Fly	837.6	241.3	1,739.3	165.2	87.7
66 kV Subtransmission Line	448.6	111.5	828.2	57.1	34.8
Telecommunications System	54.6	17.4	141.2	9.9	5.6
Total	3,677.3	912.2	6,839.5	486.8	290.4
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

Total Construction Emissions after Implementation of APMs

Estimated Daily Emissions (lbs/day)

Construction Activity	CO	ROG	NOX	PM10	PM2.5
Devers Substation	19.4	4.3	25.1	2.3	1.6
El Casco Substation	16.3	3.7	23.0	1.8	1.2
Vista Substation	17.0	3.7	23.1	1.9	1.3
San Bernardino Substation	19.4	4.3	25.1	3.5	1.8
Etiwanda Substation	1.0	0.0	0.1	0.0	0.0
~~Timoteo Substation~~	~~2.2~~	~~0.1~~	~~0.5~~	~~0.1~~	~~0.0~~
~~Tennessee Substation~~	~~2.2~~	~~0.1~~	~~0.5~~	~~0.0~~	~~0.0~~
220 kV Transmission Line	2,259.0	525.9	3,207.2	195.6	145.9
Shoo-Fly	837.6	241.3	1,391.4	119.0	78.0
66 kV Subtransmission Line	448.6	111.5	662.5	44.1	32.1
Telecommunications System	54.6	17.4	113.0	7.4	5.1
Total	3,677.3	912.2	5,471.6	375.8	267.1
SCAQMD Regional Threshold	550	75	100	150	55
Exceed SCAQMD Threshold?	TRUE	TRUE	TRUE	TRUE	TRUE

E-47	Activity Substations Devers Substation Peak Phase El Casco Substation Peak Phase Vista Substation Peak Phase San Bernardino Substation Peak Phase Etiwanda Substation Peak Phase Timoteo Substation Peak Phase Tennessee Substation Peak Phase	As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations. Activity Substations Devers Substation Peak Phase El Casco Substation Peak Phase Vista Substation Peak Phase San Bernardino Substation Peak Phase Etiwanda Substation Peak Phase ~~Timoteo Substation Peak Phase~~ ~~Tennessee Substation Peak Phase~~
APPENDIX 7 BIOLOGICAL RESOURCES		
Ap 7-1	**Appendix 7: Tables of Special Status Plants and Wildlife** Table Ap.7-1 and Table Ap.7-2 list the conservation status and habitat descriptions of special-status plant and wildlife species known from or potentially occurring in the Project Study Area. For species not observed during surveys, the potential for their occurrence was determined by biologists knowledgeable about each species based on the species' habitat requirements, range (including elevation), and previously recorded observations within the region. The following criteria were used to determine the potential for each species to occur along the Proposed Project route: □□**Present:** Species was observed within the Project Study Area during biological surveys. □□**High:** Suitable habitat is present and there is a documented occurrence of the species within the proposed route or its vicinity (approximately five miles). □□**Moderate:** Either suitable habitat is present, or there is a documented occurrence of the species within the vicinity of the proposed route (approximately five miles). □□**Low:** No documented occurrences of the species exist within the proposed route or vicinity (approximately five miles) or no marginally suitable habitat is present along the route, or both. □□**Not Likely to Occur:** Species was not observed during field surveys, no documented occurrences along the route, and the species is restricted to habitat conditions that do not occur along the proposed route. Habitat conditions include soil type, elevation range, vegetation, and other factors relevant to each species. The criteria are general guidelines and a species' potential for occurrence may be modified based on biological analysis of habitat quality, isolation, and other factors.	These criteria are not found in the Bio sections for Veg and Wildlife. At a minimum, it is recommended that these criteria be inserted in the text in both the Vegetation and Wildlife Sections to allow readers to understand how the terms are used in the document. The definitions presented in the DEIR/EIS are not entirely consistent with these terms as they were applied in the PEA and can sometimes result in misleading conclusions that indicate several species have high or moderate potential to occur when the available information indicates that such occurrence would be unlikely. For example, there are no records of California gnatcatcher anywhere in Segment 4 and the limited habitat that is present occurs at elevations above where this species normally is found (99% of occurrences area below 2,000'), but the DEIR/DEIS states that this species has a moderate potential to occur in this segment. In defining the "high potential to occur" the meaning of the phrase "documented occurrence <u>within the proposed route</u>" is unclear. Presumably, "study area" is what was intended. Also, for species with very specific habitat requirements, it should be recognized that using the term "high potential to occur" may be misleading if the study area doesn't actually contain the habitat constituents or if it is not within the species elevational range. For such species, attributing a "high potential to occur" because of documentation within five miles seems excessive and could be misleading. The definition of "moderate" is also confusing and may easily be misunderstood by readers. It indicates that a species is considered to have a "moderate potential to occur" even if suitable habitat is lacking by using the "either suitable habitat is present or documented occurrence within 5 miles" definition. First, if suitable habitat is absent within the project work areas or immediately adjacent areas, then the definition of "low potential" as it is defined here would apply (i.e., "no marginally suitable habitat is present"). However, it seems misleading to attribute anything more than a low potential or "not expected" for any species for which their habitat requirements are absent from the project study area, regardless of whether there are records documenting occurrence up to five miles away. The definition of "low potential to occur" is likewise confusing as it seems to overlap the definition of "not likely to occur." It seems reasonable to assume there could be some potential for a species to occur whether or not there are any documented occurrences as long as there is some suitable habitat present and the project area lies within the known range. However, this

		definition indicates a plant or animal still has a low potential even if both habitat and records are lacking which is actually the definition used to indicate "not expected". Arguably, if no suitable habitat is present then either a species would not be expected to occur at all or the species would not be expected to occur for any substantial period of time (i.e., only during dispersal or migration). This recognition is also lacking from these definitions, although a reference to the consideration is given in the text after the definitions. In the document, the text often seems to contradict itself to some extent by attributing a "low" or "moderate" potential to occur but then explaining that suitable habitat is lacking or that the project area lies outside the species known range or at least its known breeding range." Please consider revising the definitions to be consistent with those used in the PEA (included below for reference). At a minimum, please clarify these definitions to avoid the confusion described above. The definitions presented below are suggested as an alternative to the PEA definitions.. • Present: Species was observed within the Project Study Area during biological surveys • High: CNDDB or other documented occurrences have been recorded within 1.0 mile of the project area and suitable habitat is present. • Moderate: CNDDB or other documented occurrences have been recorded within 5 miles of the project area and suitable habitat is present (suitable nesting or roosting habitat or high quality foraging areas). Individuals were not observed during field surveys; however, the species could be present. • Low: Suitable or at least marginally suitable habitat may occur in the project area but no CNDDB records reported in recent years; records of the species within 5 miles of the project area are suspected to be now extirpated or potentially misidentified with other species; or individuals were not observed during field surveys and are not anticipated to be present. For bird and bat species, this category may be used for species that are documented, but likely to be only transient through the area during foraging or migratory movements, no suitable nesting or roosting habitat is present.

APPENDIX 9 POLICY SCREENING REPORT

City of Loma Linda, CA

Ap.9-44

City of Loma Linda

Applicable Policies	Determination	Consistent ?
LAND USE		
Special Planning Area E Implementing Policy j: Implement development of the Mission Road Special Planning Area E through the adoption of a specific plan(s) or planned development(s), so that specific siting of land uses/buildings, architectural design, landscaping, road infrastructure, utilities, and other elements can be planned in a comprehensive, rather than piecemeal, manner throughout the Special Planning Area. Implementing Policy 8.10.7.1: a) Work with Southern California Edison to improve transmission line corridors with attractive, community-serving uses such as ornamental planting and recreational uses, including trails and playing fields. … d. Underground existing overhead utility lines throughout the City with available funding…g. Develop appropriate siting regulations for the installation of utilities and telecommunication facilities to minimize potential impacts to the community.	The Proposed Project improvements in the City of Loma Linda include improvements to Timoteo Substation, and the proposed 220 kV transmission lines, 66 kV subtransmission lines, and telecommunications facilities. The Proposed Project work in Timoteo Substation would involve only modifications to the 66 kV equipment, and work would occur on the 66 kV switchrack and within the MEER. The 220 kV transmission lines work includes replacement of existing transmission infrastructure within an existing transmission line ROW that has been established for several decades. New 66 kV subtransmission line improvements would be constructed primarily in existing public streets.	YES

As a result of additional engineering analysis, the work for Timoteo and Tennessee Substations are no longer needed to support the West of Devers Upgrade Project. Please remove the following references to Timoteo and Tennessee Substations.

City of Loma Linda

Applicable Policies	Determination	Consistent?
LAND USE		
Special Planning Area E Implementing Policy j: Implement development of the Mission Road Special Planning Area E through the adoption of a specific plan(s) or planned development(s), so that specific siting of land uses/buildings, architectural design, landscaping, road infrastructure, utilities, and other elements can be planned in a comprehensive, rather than piecemeal, manner throughout the Special Planning Area. Implementing Policy 8.10.7.1: a) Work with Southern California Edison to improve transmission line corridors with attractive, community-serving uses such as ornamental planting and recreational uses, including trails and playing fields. … d. Underground existing overhead utility lines throughout the City with available funding…g. Develop appropriate siting regulations for the installation of utilities and telecommunication facilities to minimize potential impacts to the community.	The Proposed Project improvements in the City of Loma Linda include ~~improvements to Timoteo Substation~~, ~~and~~ the proposed 220 kV transmission lines, 66 kV subtransmission lines, and telecommunications facilities~~. The Proposed Project work in Timoteo Substation would involve only modifications to the 66 kV equipment, and work would occur on the 66 kV switchrack and within the MEER.~~ The 220 kV transmission lines work includes replacement of existing transmission infrastructure within an existing transmission line ROW that has been established for several decades. New 66 kV subtransmission line improvements would be constructed primarily in existing public streets.	YES

Table B-1. Typical Transmission Structure Dimensions

Type of Structure (New Proposed)	Proposed Number of Structures	Approximate Height Above Ground	Approximate Pole Diameter	Approximate Auger Hole Depth	Approximate Auger Diameter
LST	~~394~~ 384	110- ~~189~~ 193 feet	N/A	15-50 feet	3.0-7.0 feet at each leg
TSP	~~76~~ 83	110-~~200~~ 198 feet	3.0-~~7.0~~ 10.0 ft	30-60 feet	5-~~12~~ 14 feet

Source: SCE, ~~2013~~ 2015

Note: Specific structure type, foundation type, quantities, height, and spacing would be determined upon final engineering, and would be constructed in compliance with CPUC General Order 95.

Footnote 1- Includes ~~38~~ 34 TSPs in Segment 5 per agreement between SCE and Morongo.

Table B-2. Transmission 220 kV Removal and Installation Per Segment

	Segment 1	Segment 2	Segment 3	Segment 4	Segment 5	Segment 6	Total
Proposed Project Removals							
Double-circuit latice steel tower	44	~~25~~ 23	33	~~37~~ 36	33	~~28~~ 33	~~200~~ 202
Single-circuit latice STEEL tower	1	0	85	61	34	30	211
H-frame	0	0	0	53	55	45	153
Three-pole structure	0	0	0	10	10	9	29
Single-circuit TSP	0	0	0	0	5	0	5
Conductor (miles)	59	31	120	148	108	96	562
OHGW (miles)	7	5	50	63	45	40	210
Proposed Project Installation							
Double-circuit lattice steel tower	~~46~~ 42	~~19~~ 18	~~94~~ 86	~~98~~ 97	~~60~~ 62	~~77~~ 79	~~394~~ 384
Double-circuit tubular steel pole	~~1~~ 2	~~7~~ 5	~~10~~ 16	14	~~38~~ 36	~~2~~ *6*	~~72~~ 79
Single-circuit tubular steel pole	2	2	0	0	0	0	4
Circuit length (miles)	14	10	40	48	36	32	180
Conductor (miles)	87	67	264	320	250	211	1199
OPGW (miles)	7	6	22	26	20	18	99
OHGW (miles)	**0.5**	**0.5**	**0.5**	**0.5**	**0**	**3**	**5**
Proposed Project Existing Tower to be Modified							
Double Circuit lattice steel tower	1	~~4~~ 6	4	~~5~~ 6	0	~~5~~ 0	~~19~~ 17

Southern California Edison's West of Devers Upgrade Project Additional Material Yard Environmental Review

PREPARED FOR: MPO
PREPARED BY: Patty Nevins/SCE CEHS
DATE: September 22, 2015

SCE has included an additional Material Staging Yard, due to the potential for any one of the yards listed in the West of Devers Upgrade DEIR Section B Project Description Table B-5 to be occupied and unavailable prior to SCE commencing with construction. SCE has also updated Figure B-16 to include the additional yard. The environmental analysis of this additional yard, as well as SCE's conclusion that the addition of this yard would not result in any additional impacts beyond those already described in the DEIR/DEIS, is described below:

Table B-5. Potential Staging Yard Locations

Yard Name	Location	Condition	Approx Area (acres)
Matich Material and Equipment Staging Area	SE corner of E Theodore St and N Hathaway	Previously Disturbed; vacant	21

Matich Corporation Material Yard: The site is located in the city of Banning, Riverside County, California, Parcel Numbers 534-241-003, 534-241-004, 534-242-001, 534-241-002, and 534-242-003. The site is bounded on the south, southwest, and west by residential and undeveloped properties, on the east by North Hathaway Street/Morongo Reservation, and on the north by a sand and gravel mining operation. The site encompasses an area of approximately 21 acres and has historically been used as an equipment and materials yard. The site surface is composed of approximately 50 percent concrete (paved) and 50 percent friable soil.

Aesthetics

- Using the site as a material yard is a similar use to previous uses. Residences are located bounding the south, southwest, and west sides of the proposed material yard. The proposed fence and screening will mitigate visual impacts. The material yard will be fenced for security and the fence would contain a visual barrier to minimize views into the site. The material yard would not conflict with the types of structures and uses in the area and would not result in a change to the visual character of the area.
- The material yard would be temporary in nature and generally consistent with the conclusion in Section D.18 Visual Resources p. D.18-33 of the DEIR.

Agriculture and Forestry Resources

- The site is not currently used for agricultural and forestry purposes. The site use is temporary and would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use or result in the conversion or loss of forest land to non-forest use.
- The material yard would be temporary in nature and generally consistent with the conclusion in Section D.2 Agricultural p. D.2-10 of the DEIR.

Air Quality

- Historic uses of the site are similar to what SCE is proposing. There are sensitive receptors across the street from the yard, but the proposed yard would not introduce new sources of pollutants since the proposed use is consistent with the existing use.
- In addition, with the incorporating of the DEIR proposed mitigation measures, the material yard would be temporary in nature and generally consistent with the conclusion in Section D.3 Air Quality p. D.3-15 of the DEIR.

Biological Resources

- Based on a field visit to the site and review of available reports and materials, construction and operation of the yard would not result in significant or substantial adverse effects on any known candidate, sensitive, or special status species. The Los Angeles pocket mouse *(Perognathus longimembris brevinasus),* and San Diego pocket mouse *(Chaetodipus fallax fallax Northwestern)* have a potential to occur in the area. With incorporation of the DEIR Mitigation Measures, which would apply to the construction and operation of the material yards, potential impacts would be reduced, and be generally consistent with the conclusion in Section D.4 and D.5.

Cultural Resources

- The proposed material yard has been surveyed for cultural resources (DeCarlo 2015, submitted to CPUC under separate cover). No cultural resources were recorded within the proposed material yard. Mitigation Measures identified in the DIER and the cultural report include measures to reduce potentially significant impacts from the Project, which would apply to the construction and operation of the material yards.
- Based on the cultural resources survey and review of available materials, potential impacts to cultural resources would be less than significant and are generally consistent with the conclusion in Sections D.7 and D.14.

Geology and Soils

- No geological hazards were observed at the site. Due to the temporary nature of construction activities, the probability of a large earthquake exposing construction personnel to fault rupture and seismic-related hazards during construction of the Proposed Project would be extremely low. Implementation of SWPPPs and soil stabilization measures would reduce the potential for soil erosion. The site will be restored to the current configuration upon completion of

construction. Topsoil materials may have to be removed and set aside during grading operations. Erosion controls will mitigate erosion of topsoil materials. Therefore, the Proposed Project would have a less than significant impact to geology and soils with regard to construction and operation of the material yard, and would be generally consistent with the conclusion in Section D.9.

Climate Change

- The greenhouse gas emission calculations in the DEIR assumed that material yards would be needed and were incorporated into the project design. Therefore, construction of the new material yard will not result in a net increase in construction activities with the potential to impact greenhouse gas emissions not already addressed by the DEIR. In addition, the material yard would be temporary in nature and generally consistent with the conclusion in Section D.6 Climate Change.

Hazards and Hazardous Materials

- The proposed material yard will not result in construction activities with the potential to impact the location and quantity of hazards and hazardous materials not already addressed by the DEIR. In addition, the siting of a material yard does not contain listed DTSC sites. Therefore, impacts are generally consistent with the conclusion in Section D.10.

Hydrology and Water Quality

- Based on field evaluation, the site does not contain drainage(s) that would be considered jurisdictional waters. Therefore, the proposed material yard does not significantly affect area hydrology and water quality.

Land Use and Planning

- The siting of a material yard at this site would not physically divide an established community or conflict with any applicable land use plan or zoning ordinance, habitat conservation, or natural community conservation plan. As noted in the DEIR, the Proposed Project construction would not conflict with locally adopted land use plans, policies, or regulations, and impacts would be less than significant. The Matich Yard location would fall under the City of Banning General Plan and would be consistent with the plan, policies and programs. Land that may be disturbed at a staging yard would be restored to pre-construction conditions or to conditions agreed upon between SCE and the landowner. Therefore, impacts are generally consistent with the conclusions in Section D.11.

Mineral Resources

- Although mineral resources in the form of sand and gravel are found in the general area, the site does not appear to have been used as a source of sand and gravel. A large sand and gravel mining operation is located adjacent to the site along the northern boundary. The material yard

is considered temporary and would have no impact on mineral resources in the future. Therefore, impacts are generally consistent with the conclusions in Section D.12.

Noise

- The potential noise generated by material yard operations is anticipated to be similar to the noise generated by historic use of the site as well as the sand and gravel mining operation, located to the north. Therefore, the proposed material yard will not result in a net increase in noise impacts not already addressed by the DEIR Environmental Impact Analysis. Therefore, impacts are generally consistent with the conclusions in Section D.13.

Socioeconomics, Population and Housing, and Environmental Justice

- The site would not induce growth or result in the displacement of housing that would require construction of replacement housing elsewhere. Based on the use of the site and the socioeconomics, population and housing, and environmental justice impact analysis presented in the DEIR, the siting of a material yard at this location does not result in significant additional impacts beyond those already discussed in Section D.8

Public Services and Utilities and Service Systems

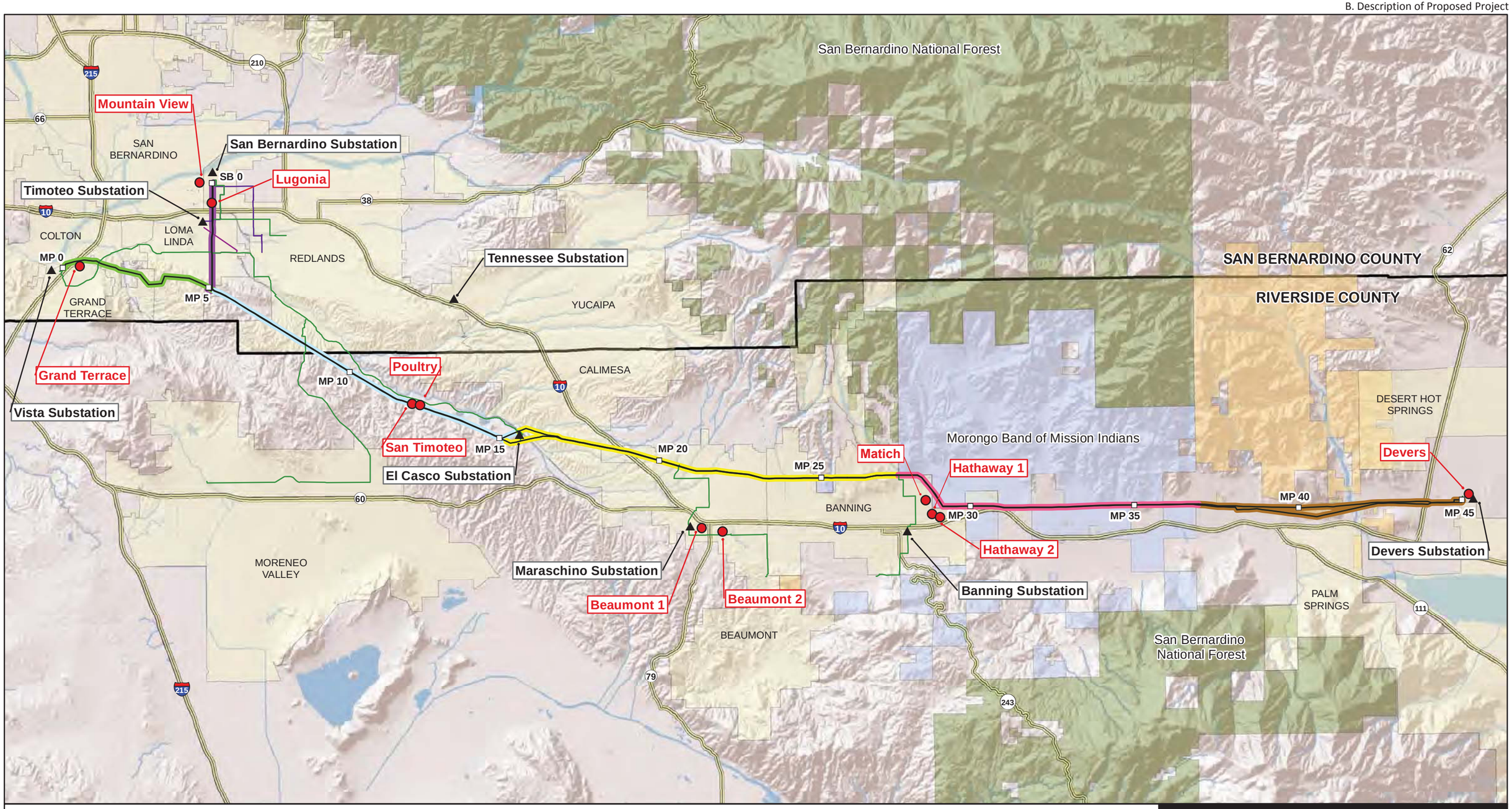
- The site will not require significant additional public services to operate. The DEIR analysis anticipated the use of material yards to support construction. Therefore, the siting of a material yard at this location does not result in significant additional impacts from what was analyzed in Section D.17.
- The site will not require significant additional utility services to operate with the exception of an electrical distribution line. Electrical lines are readily available in the general area and the material yard will only require minimal energy to operate. Portable toilets will be used for personnel operating the material yard. Therefore, the siting of a material yard at this location does not result in significant additional utility and service system impacts.

Recreation

- The site is not located adjacent to or nearby existing recreation areas. The proposed project will not utilize existing recreational facilities. Therefore, the siting of a material yard at this location does not result in significant additional impacts and is generally consistent with the conclusions in Section D.15

Transportation and Traffic

- The site has been used as a materials and equipment yard. In addition, Hathaway Street, is a main road with existing truck traffic from adjacent uses. Because of the temporary nature of the yard and with the incorporation of mitigation measures proposed in Section D.16 Transportation and Traffic, impacts would be generally consistent with the conclusions in the DEIR.



Sources: SCE 2013

N W E S

0 1.5 3 6 Miles

Legend

Components of Proposed Project

- Substation
- Telecommunication Lines
- Distribution Lines
- Subtransmission Lines
- Milepost (e.g. MP 10, SB 0)
- Staging Yards
- County Line

Proposed Project Segments*

- Segment 1
- Segment 2
- Segment 3
- Segment 4
- Segment 5
- Segment 6

*All segments include both 220 kV conductors and telecommunications lines.

Land Jurisdiction

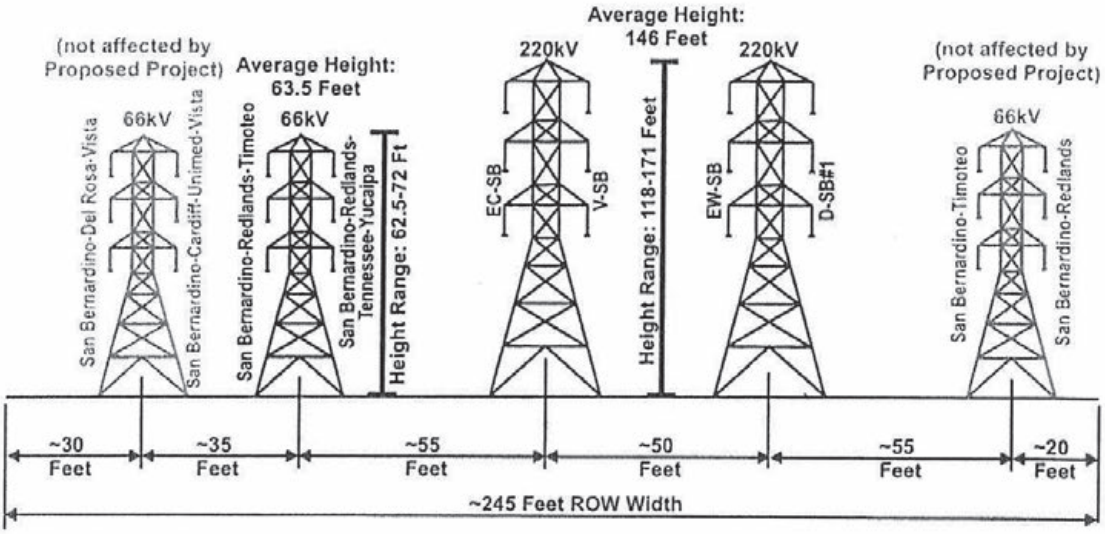
- City Boundary
- Morongo Band of Mission Indians
- Bureau of Land Management
- U.S. Forest Service

West of Devers Upgrade Project

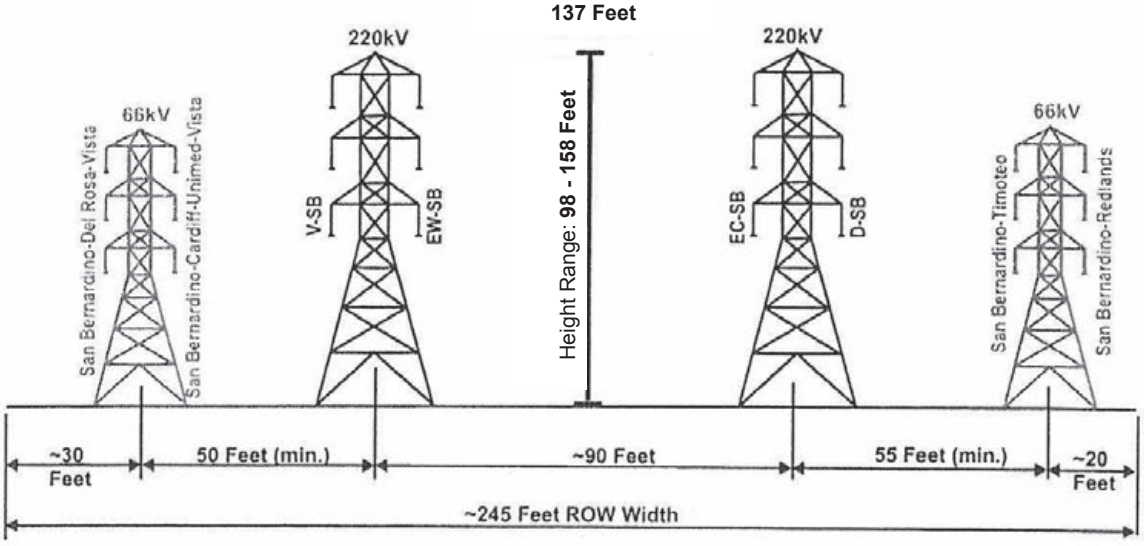
Figure B-16

Proposed Staging Yard Locations

Existing
Segment 1 - Looking North



Proposed
Segment 1

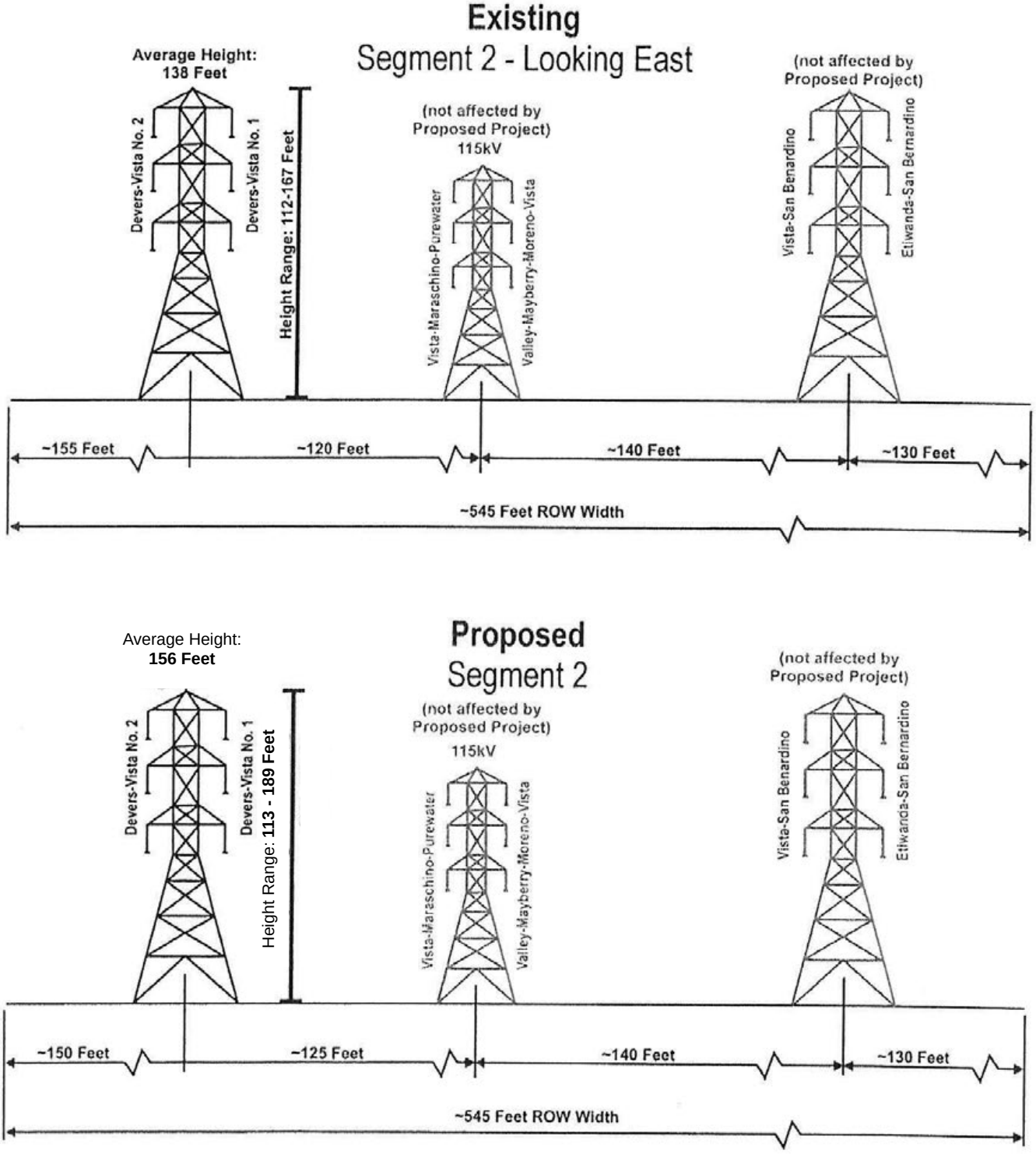


Source: SCE, 2014.

Not to Scale

West of Devers Upgrade Project

Figure B-2b
Existing and Proposed Corridor Profile - Segment 1

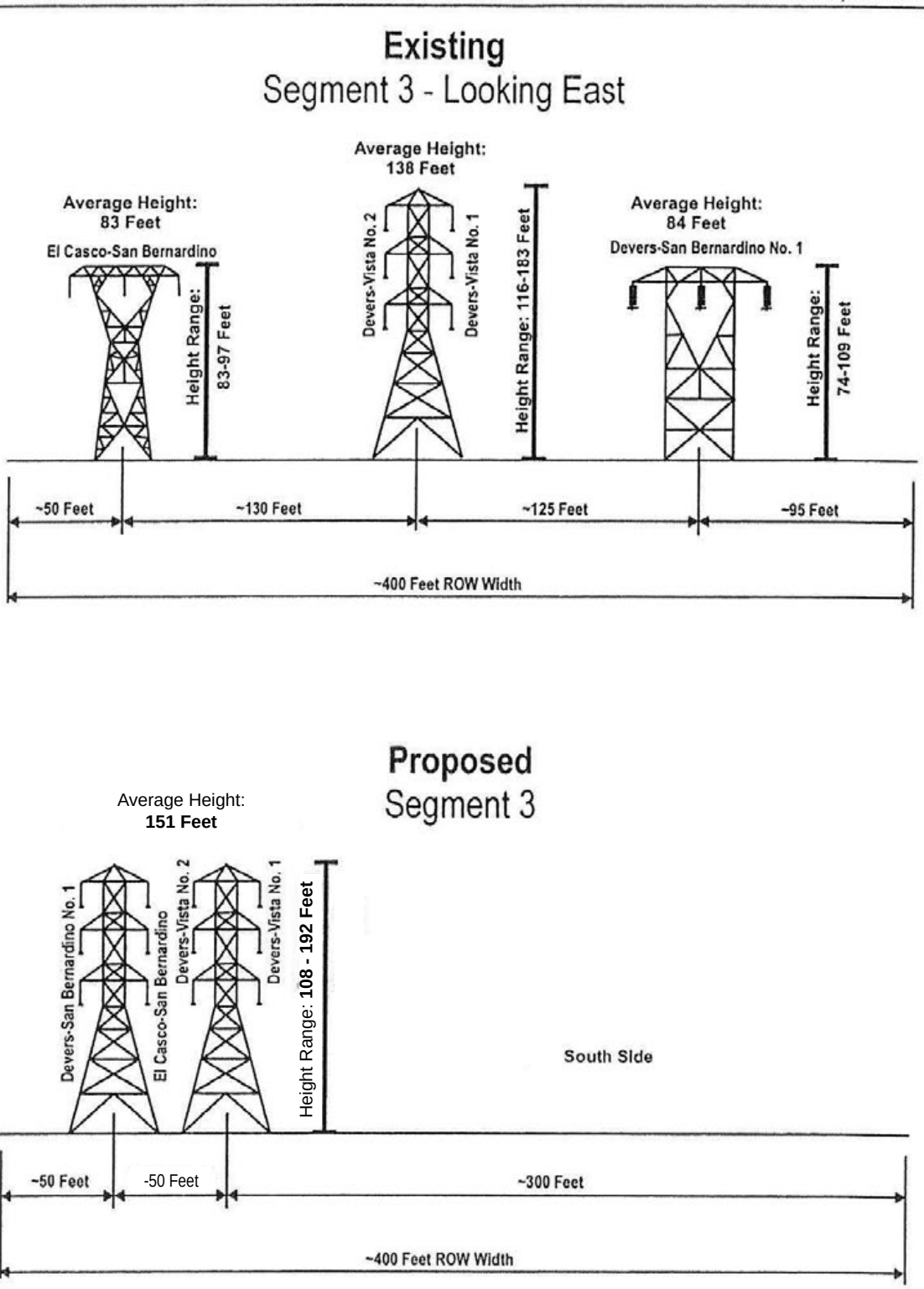


Source: SCE, 2014.

Not to Scale

West of Devers Upgrade Project

Figure B-3b
Existing and Proposed Corridor Profile - Segment 2



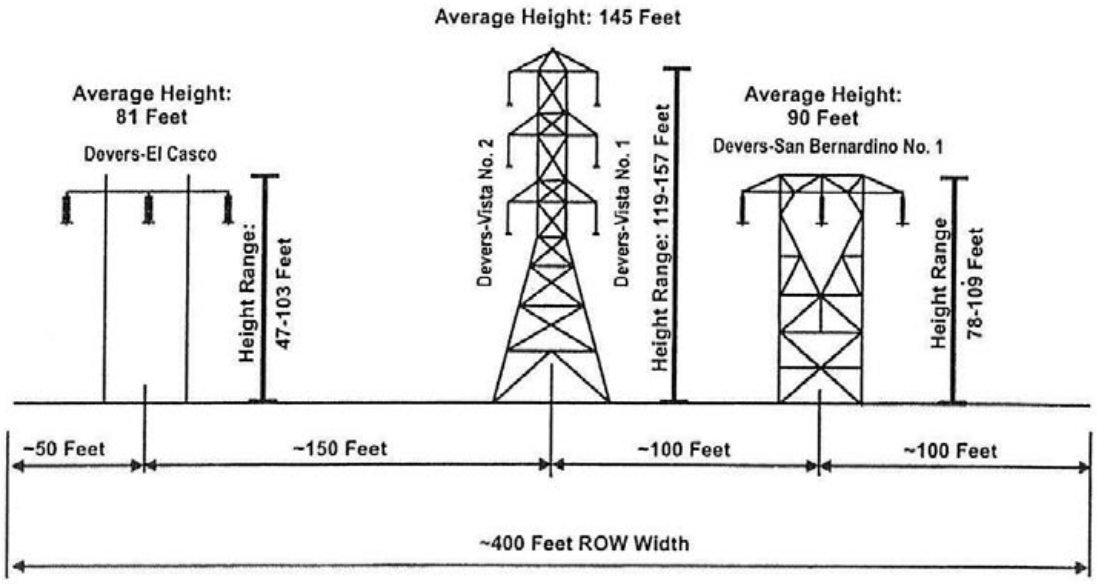
Source: SCE, 2014.

Not to Scale

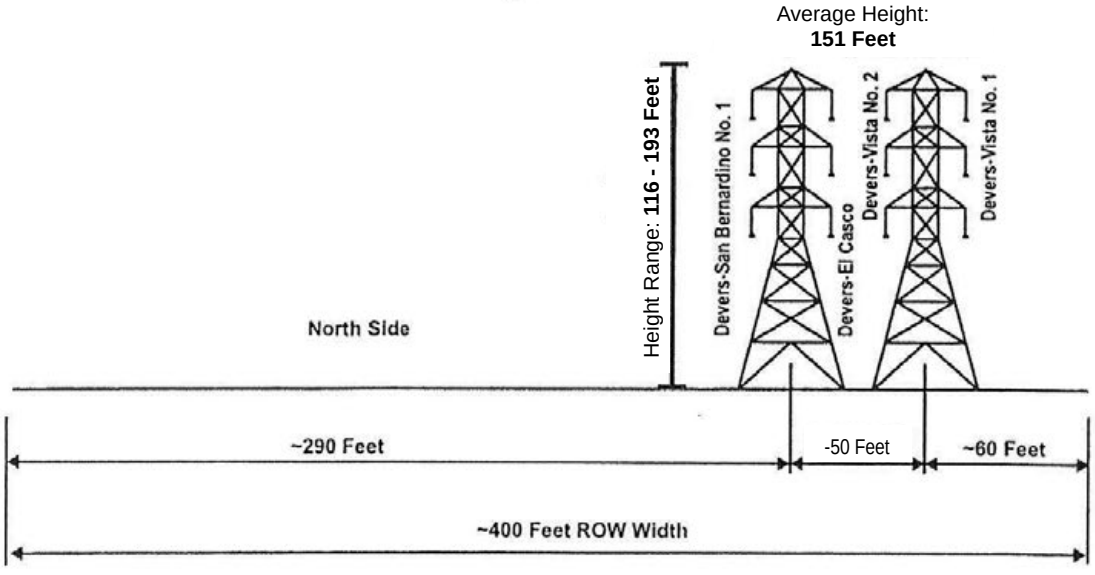
West of Devers Upgrade Project

Figure B-4b
Existing and Proposed Corridor Profile - Segment 3

Existing
Segment 4 - Looking East



Proposed
Segment 4



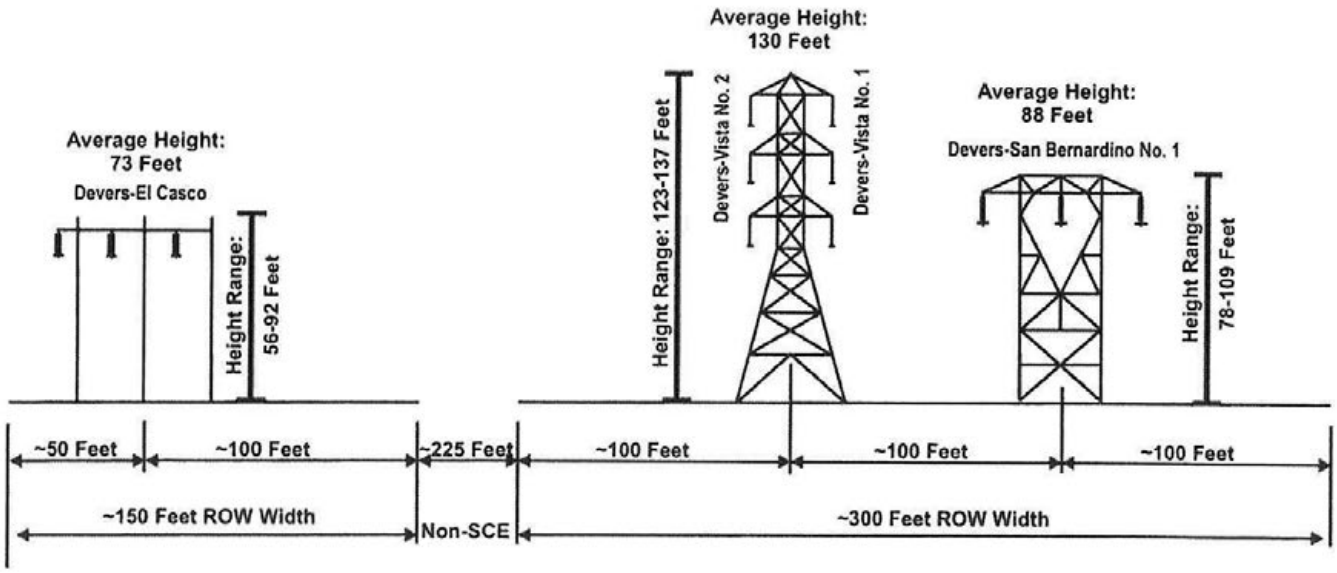
Source: SCE, 2014.

Not to Scale

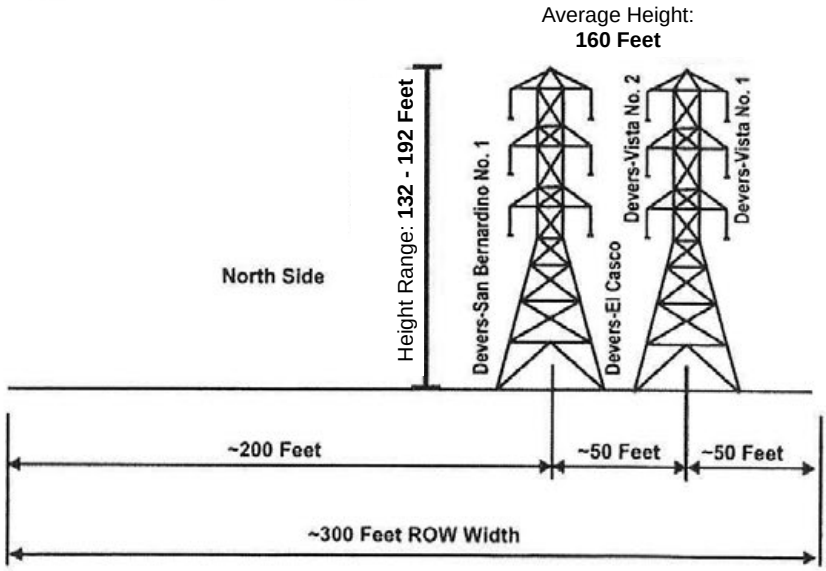
West of Devers Upgrade Project

Figure B-5b
Existing and Proposed Corridor Profile - Segment 4

Existing
Segment 5 (Banning)- Looking East



Proposed
Segment 5A (Banning)



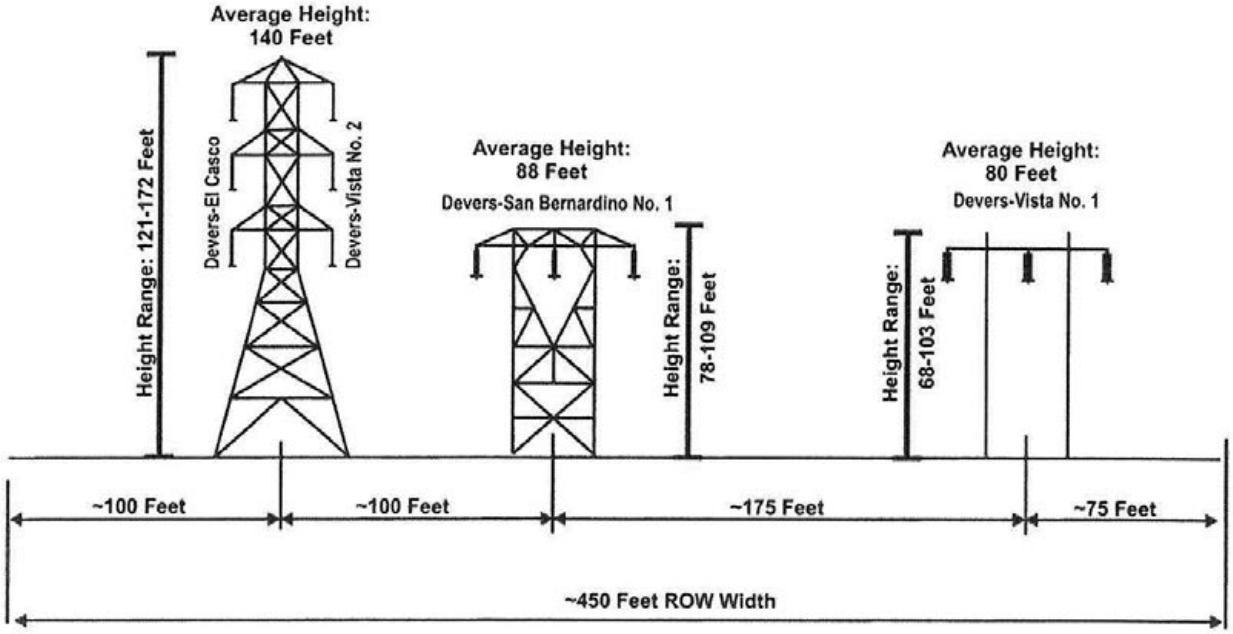
Source: SCE, 2014.

Not to Scale

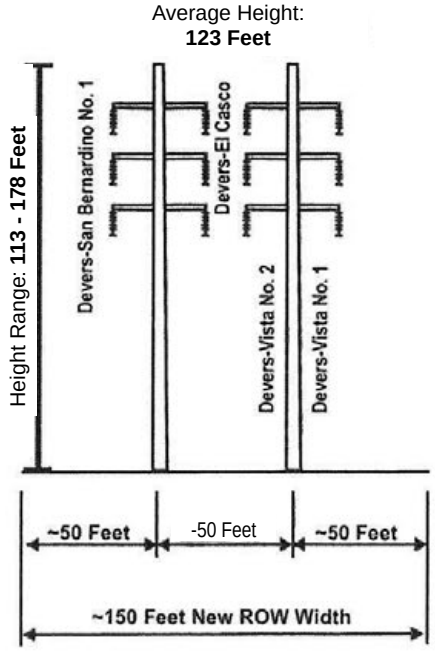
West of Devers Upgrade Project

Figure B-6b
Existing and Proposed Corridor Profile - Segment 5

Existing
Segment 5 (Morongo) - Looking East



Proposed
Segment 5B (Morongo)

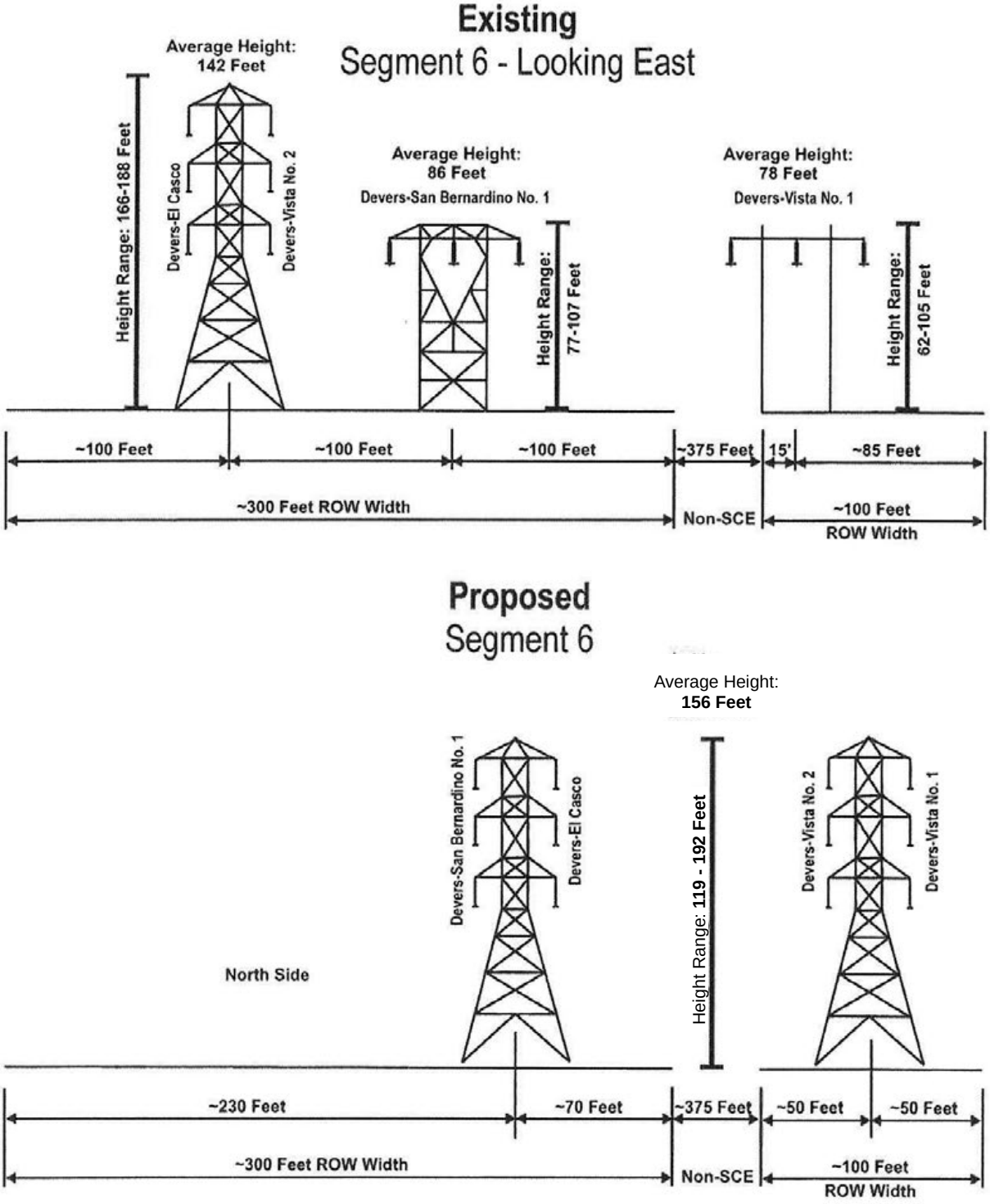


Source: SCE, 2014.

Not to Scale

West of Devers Upgrade Project

Figure B-6c
Existing and Proposed Corridor Profile - Segment 5

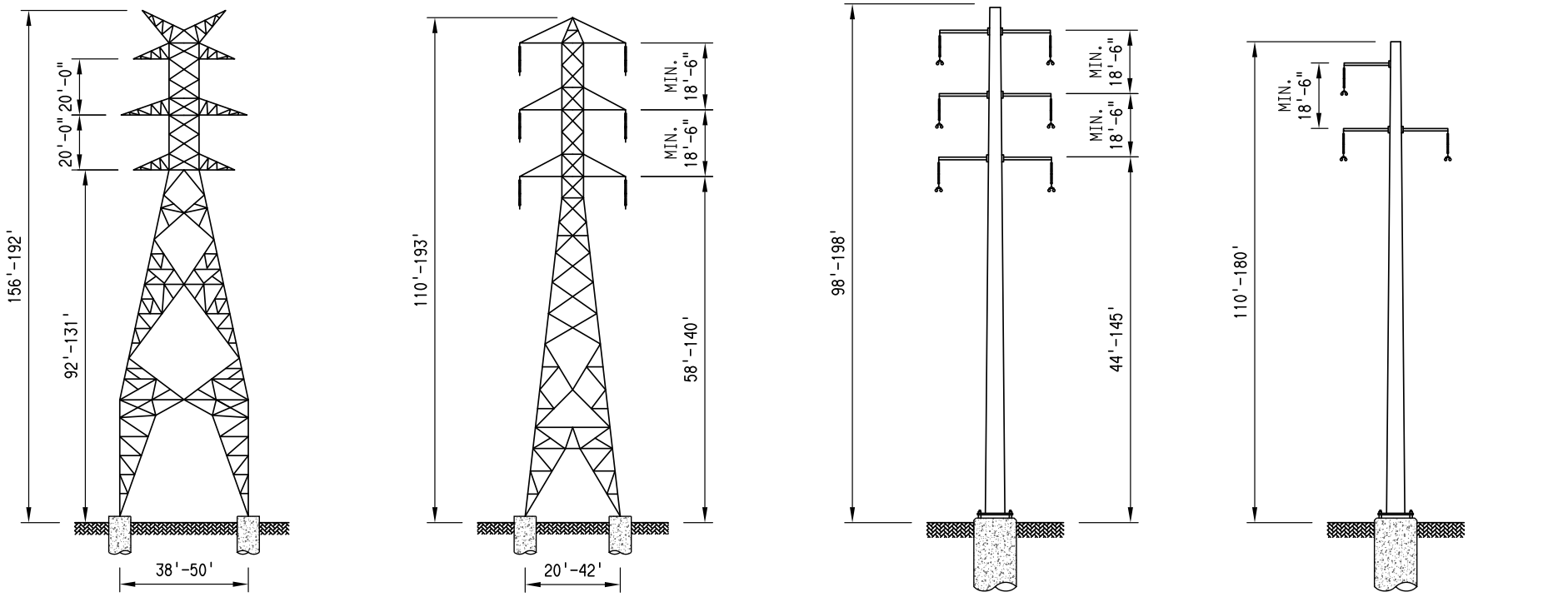


Source: SCE, 2014.

Not to Scale

West of Devers Upgrade Project

Figure B-7b
Existing and Proposed Corridor Profile - Segment 6



220KV DOUBLE CIRCUIT LATTICE STEEL TOWER
(OPGW/OHGW NOT SHOWN)
INTENDED FOR WHITEWATER
CROSSING AREA ONLY

220KV DOUBLE CIRCUIT LATTICE STEEL TOWER
(OPGW/OHGW NOT SHOWN)

220KV DOUBLE CIRCUIT TUBULAR STEEL POLE
(OPGW/OHGW NOT SHOWN)

220KV SINGLE CIRCUIT TUBULAR STEEL POLE
(OPGW/OHGW NOT SHOWN)

Source: SCE, 2015

West of Devers Upgrade Project

Figure B-10

Typical 220 kV Transmission Structures

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
1E03	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	141
1E04	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	156
1E05	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	140
1E06	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	132
1E08	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	135
1E10	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	158
1E11	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	146
1E12	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	131
1E13	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	126
1E15	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	128
1E16	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	119
1E17	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	129
1E18	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	147
1E19	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	144
1E20	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	157
1E21	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	149
1E22	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	132
1E23	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	126
1E24	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	126
1E25	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	138
1E26	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	156
1E27	El Casco-San Bernardino	n/a	Proposed	TSP	133
1E28	Devers-San Bernardino	n/a	Proposed	TSP	133
1W00	Etiwanda-San Bernardino	San Bernardino-Vista	Modify	LST	141
1W01	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	TSP	98
1W02	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	TSP	98
1W03	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	144
1W04	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	154
1W05	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	141
1W06	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	132
1W08	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	135
1W10	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	158
1W11	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	146
1W12	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	132
1W13	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	125
1W15	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	128
1W16	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	120
1W17	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	129
1W18	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	147
1W19	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	144
1W20	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	157
1W21	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	151
1W22	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	133
1W23	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	126
1W24	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	126
1W25	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	138
1W26	Etiwanda-San Bernardino	San Bernardino-Vista	Proposed	LST	156
SB1S	Devers-San Bernardino	n/a	Modify	Rack	65
SB2S	El Casco-San Bernardino	n/a	Modify	Rack	65
SB6N	Etiwanda-San Bernardino	n/a	Modify	Rack	65
SB7S	San Bernardino-Vista	n/a	Modify	Rack	65
M0-T1	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	170
M0-T1(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	171
M0-T2	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	131

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M0-T2(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M0-T3	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	127
M0-T3(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	127
M0-T4	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	126
M0-T4(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M0-T5	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	138
M0-T5(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	139
M0-T6	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	138
M0-T6	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	138
M0-T7	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	146
M0-T7	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	146
M0-T8	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M0-T8	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	131
M1-T1	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	138
M1-T1(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	138
M1-T2	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	123
M1-T2(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	124
M1-T3	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	123
M1-T3(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	123
M1-T4	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	121
M1-T4(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	116
M1-T5	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M1-T5	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	133
M1-T6	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M1-T6	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	131
M1-T7	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	131
M1-T7	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	130
M2-T1	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	153
M2-T1(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	155
M2-T2	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	146
M2-T2(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	147
M2-T3	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	148
M2-T3(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	148
M2-T4	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	154
M2-T4(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	155
M2-T5	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	118
M2-T5	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	117
M39-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	165
M3-T1	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	122
M3-T1(2)	El Casco-San Bernardino	San Bernardino-Vista	Remove	LST	148
M3-T2	Devers-San Bernardino No.1	Etiwanda-San Bernardino	Remove	LST	128
M3-T2(3)	San Bernardino-Vista	n/a	Remove	LST	128

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
2N01	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	164
2N02	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	172
2N04	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	189
2N06	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	143
2N07	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	167
2N08	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	124
2N10	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	161
2N11	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
2N12	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
2N14	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
2N15	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	158
2N16	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
2N17	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	153
2N18	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	184
2N20	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
2N21	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
2N22	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	134
2N23	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
2N25	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
2N26	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	174
2N28	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	156
2N29	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	150
2N30	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	131
2N31	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	147
2N32	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
2N33	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	158
2N34	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
2N35	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
2N36	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	143
2N37	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	168
2N38	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	168
V1C	Devers-Vista No.1	Devers-Vista No.2	Modify	Rack	65
V1XC	Devers-Vista No.2	Devers-Vista No.2	Modify	Rack	65
M39-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	174
M40-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	144
M40-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	111
M40-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	131
M40-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M41-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	122
M41-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M41-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	150
M41-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	140
M42-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	145
M42-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	122
M42-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	141
M42-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	144
M42-T5	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	153
M43-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	112
M43-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	123
M43-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	123
M43-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	166
M43-T6	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	158
M44-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	149
M44-T5	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	137

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M44-T6	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	141
M44-T7	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	141
M44-T8	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	141
M5-T1(2)	El Casco-San Bernardino	n/a	Remove	LST	141

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
3N01	Devers-San Bernardino	El Casco-San Bernardino	Modify	LST	133
3N02	Devers-San Bernardino	El Casco-San Bernardino	Modify	LST	129
3N03	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	140
3N04	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	127
3N06	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	116
3N07	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	182
3N08	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	145
3N10	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	181
3N12	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	135
3N13	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	181
3N14	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	159
3N15	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	166
3N16	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	123
3N17	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	153
3N19	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	127
3N20	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	128
3N21	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	143
3N22	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	182
3N23	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	144
3N24	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	164
3N25	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	131
3N26	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	153
3N27	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	147
3N28	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	134
3N29	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	192
3N31	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	127
3N32	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	134
3N33	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	169
3N35	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	108
3N36	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	183
3N37	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	136
3N38	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	125
3N39	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	159
3N40	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	131
3N41	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	191
3N42	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	124
3N43	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	136
3N44	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	163
3N46	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	128
3N48	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	128
3N50	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	182
3N51	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	164
3N53	Devers-San Bernardino	El Casco-San Bernardino	Proposed	TSP	153
3N55	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	152
3N56	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	139
3N57	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	166
3N59	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	154
3N60	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	161
3N61	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	152
3N62	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	156
3N63	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	124
3N64	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	163
3N65	Devers-San Bernardino	El Casco-San Bernardino	Proposed	LST	140
3S01	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	175

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
3S02	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	128
3S03	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	163
3S04	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	181
3S06	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	143
3S07	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
3S08	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
3S10	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	191
3S12	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	135
3S13	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
3S14	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	159
3S15	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	189
3S16	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	138
3S17	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	163
3S19	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	127
3S20	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	128
3S21	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	143
3S22	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	191
3S23	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	135
3S24	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
3S25	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	129
3S26	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	153
3S27	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	131
3S28	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	151
3S29	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
3S31	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	134
3S32	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	129
3S33	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	177
3S35	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	108
3S36	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	183
3S37	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	132
3S38	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	127
3S39	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
3S40	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	132
3S41	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
3S42	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	125
3S43	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	136
3S44	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
3S46	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	128
3S48	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	129
3S50	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
3S51	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	159
3S53	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	153
3S55	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	159
3S56	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	140
3S57	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	162
3S59	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154
3S60	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	162
3S61	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	152
3S62	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
3S63	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	124
3S64	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
3S65	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	180
EC1N	El Casco-San Bernardino	n/a	Modify	Rack	65
M29-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	115

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M30-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	177
M30-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	152
M30-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M30-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	151
M31-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	129
M31-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	155
M31-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	151
M32-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	146
M32-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	150
M32-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M33-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M33-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	137
M33-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	132
M33-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	122
M33-T5	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	118
M34-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	118
M34-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	117
M34-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	147
M35-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M35-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	121
M36-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	127
M36-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	134
M36-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M37-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	135
M37-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	134
M37-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	178
M38-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	182
M38-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	155
M38-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	142
M38-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	133
M39-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	129
M39-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	146
M89-T1	Devers-San Bernardino No.1	n/a	Remove	LST	90
M89-T2	Devers-San Bernardino No.1	n/a	Remove	LST	83
M89-T3	Devers-San Bernardino No.1	n/a	Remove	LST	74
M90-T1	Devers-San Bernardino No.1	n/a	Remove	LST	77
M90-T2	Devers-San Bernardino No.1	n/a	Remove	LST	74
M90-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M90-T4	Devers-San Bernardino No.1	n/a	Remove	LST	81
M91-T1	Devers-San Bernardino No.1	n/a	Remove	LST	82
M91-T2	Devers-San Bernardino No.1	n/a	Remove	LST	81
M91-T3	Devers-San Bernardino No.1	n/a	Remove	LST	82
M92-T1	Devers-San Bernardino No.1	n/a	Remove	LST	83
M92-T2	Devers-San Bernardino No.1	n/a	Remove	LST	108
M92-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M93-T1	Devers-San Bernardino No.1	n/a	Remove	LST	78
M93-T2	Devers-San Bernardino No.1	n/a	Remove	LST	83
M93-T3	Devers-San Bernardino No.1	n/a	Remove	LST	98
M93-T4	Devers-San Bernardino No.1	n/a	Remove	LST	75
M94-T1	Devers-San Bernardino No.1	n/a	Remove	LST	78
M94-T2	Devers-San Bernardino No.1	n/a	Remove	LST	78
M95-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M95-T2	Devers-San Bernardino No.1	n/a	Remove	LST	78
M95-T3	Devers-San Bernardino No.1	n/a	Remove	LST	80

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M96-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M96-T2	Devers-San Bernardino No.1	n/a	Remove	LST	76
M96-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M97-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M97-T2	Devers-San Bernardino No.1	n/a	Remove	LST	83
M97-T3	Devers-San Bernardino No.1	n/a	Remove	LST	90
M98-T1	Devers-San Bernardino No.1	n/a	Remove	LST	108
M98-T2	Devers-San Bernardino No.1	n/a	Remove	LST	108
M98-T3	Devers-San Bernardino No.1	n/a	Remove	LST	80
M99-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M99-T2	Devers-San Bernardino No.1	n/a	Remove	LST	79
M99-T3	Devers-San Bernardino No.1	n/a	Remove	LST	81
PP#123223	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123224	El Casco-San Bernardino	n/a	Remove	LST	84
PP#123225	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123226	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123227	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123228	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123229	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123230	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123231	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123232	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123233	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123234	El Casco-San Bernardino	n/a	Remove	LST	84
PP#123235	El Casco-San Bernardino	n/a	Remove	LST	96
PP#123236	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123237	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123238	El Casco-San Bernardino	n/a	Remove	LST	94
PP#123239	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123240	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123241	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123242	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123243	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123244	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123245	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123246	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123247	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123248	El Casco-San Bernardino	n/a	Remove	LST	83
PP#123249	El Casco-San Bernardino	n/a	Remove	LST	82
PP#123250	El Casco-San Bernardino	n/a	Remove	LST	83
PP#123251	El Casco-San Bernardino	n/a	Remove	LST	94
PP#123252	El Casco-San Bernardino	n/a	Remove	LST	84
PP#123253	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123254	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123255	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123256	El Casco-San Bernardino	n/a	Remove	LST	84
PP#123257	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123258	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123259	El Casco-San Bernardino	n/a	Remove	LST	96
PP#123260	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123261	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123262	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123263	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123264	El Casco-San Bernardino	n/a	Remove	LST	86

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
PP#123265	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123266	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123267	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123268	El Casco-San Bernardino	n/a	Remove	LST	86
PP#123269	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123270	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123271	El Casco-San Bernardino	n/a	Remove	LST	95
PP#123272	El Casco-San Bernardino	n/a	Remove	LST	85
PP#123273	El Casco-San Bernardino	n/a	Remove	LST	97

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
4N01	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	153
4N02	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	163
4N03	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	180
4N04	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	193
4N05	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	128
4N06	Devers-San Bernardino	Devers-El Casco	Proposed	LST	134
4N07	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
4N08	Devers-San Bernardino	Devers-El Casco	Proposed	LST	127
4N09	Devers-San Bernardino	Devers-El Casco	Proposed	LST	167
4N10	Devers-San Bernardino	Devers-El Casco	Proposed	LST	117
4N12	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	153
4N13	Devers-San Bernardino	Devers-El Casco	Modify	LST	125
4N14	Devers-San Bernardino	Devers-El Casco	Proposed	LST	163
4N15	Devers-San Bernardino	Devers-El Casco	Proposed	LST	129
4N16	Devers-San Bernardino	Devers-El Casco	Proposed	LST	130
4N17	Devers-San Bernardino	Devers-El Casco	Proposed	LST	140
4N18	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
4N19	Devers-San Bernardino	Devers-El Casco	Proposed	LST	133
4N20	Devers-San Bernardino	Devers-El Casco	Proposed	LST	133
4N21	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
4N22	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
4N23	Devers-San Bernardino	Devers-El Casco	Proposed	LST	137
4N24	Devers-San Bernardino	Devers-El Casco	Proposed	LST	161
4N25	Devers-San Bernardino	Devers-El Casco	Proposed	LST	164
4N26	Devers-San Bernardino	Devers-El Casco	Proposed	LST	191
4N27	Devers-San Bernardino	Devers-El Casco	Proposed	LST	191
4N29	Devers-San Bernardino	Devers-El Casco	Proposed	LST	148
4N30	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
4N31	Devers-San Bernardino	Devers-El Casco	Proposed	LST	145
4N32	Devers-San Bernardino	Devers-El Casco	Proposed	LST	165
4N34	Devers-San Bernardino	Devers-El Casco	Modify	LST	154
4N35	Devers-San Bernardino	Devers-El Casco	Proposed	LST	153
4N36	Devers-San Bernardino	Devers-El Casco	Proposed	LST	138
4N37	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
4N38	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
4N39	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
4N40	Devers-San Bernardino	Devers-El Casco	Proposed	LST	127
4N41	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
4N42	Devers-San Bernardino	Devers-El Casco	Proposed	LST	146
4N43	Devers-San Bernardino	Devers-El Casco	Proposed	LST	166
4N44	Devers-San Bernardino	Devers-El Casco	Proposed	LST	159
4N45	Devers-San Bernardino	Devers-El Casco	Proposed	LST	156
4N46	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
4N47	Devers-San Bernardino	Devers-El Casco	Proposed	LST	158
4N48	Devers-San Bernardino	Devers-El Casco	Proposed	LST	189
4N50	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
4N51	Devers-San Bernardino	Devers-El Casco	Proposed	LST	156
4N52	Devers-San Bernardino	Devers-El Casco	Proposed	LST	129
4N53	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
4N54	Devers-San Bernardino	Devers-El Casco	Proposed	LST	148
4N55	Devers-San Bernardino	Devers-El Casco	Proposed	LST	155
4N56	Devers-San Bernardino	Devers-El Casco	Modify	LST	176
4N57	Devers-San Bernardino	Devers-El Casco	Proposed	LST	120
4N58	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	138

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
4N59	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	128
4N60	Devers-San Bernardino	Devers-El Casco	Proposed	LST	149
4N61	Devers-San Bernardino	Devers-El Casco	Proposed	LST	136
4N62	Devers-San Bernardino	Devers-El Casco	Proposed	LST	119
4N63	Devers-San Bernardino	Devers-El Casco	Proposed	LST	135
4N64	Devers-San Bernardino	Devers-El Casco	Proposed	LST	134
4N65	Devers-El Casco	n/a	Modify	LST	132
4S01	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	153
4S02	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	188
4S03	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	188
4S04	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	193
4S05	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	128
4S06	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
4S07	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
4S08	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	128
4S09	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	167
4S10	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	119
4S12	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	148
4S13	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	117
4S14	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
4S15	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	130
4S16	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	133
4S17	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
4S18	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
4S19	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	133
4S20	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	133
4S21	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
4S22	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
4S23	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	136
4S24	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	160
4S25	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
4S26	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	191
4S27	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
4S29	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	148
4S30	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
4S31	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	145
4S32	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
4S34	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	159
4S35	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
4S36	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
4S37	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	187
4S38	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
4S39	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	139
4S40	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	127
4S41	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
4S42	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	150
4S43	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	166
4S44	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	158
4S45	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	156
4S46	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
4S47	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
4S48	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
4S50	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
4S51	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
4S52	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	138
4S53	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
4S54	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	145
4S55	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
4S56	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
4S57	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	124
4S58	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	139
4S59	Devers-Vista No.1	Devers-Vista No.2	Modify	LST	148
4S60	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
EC7N	Devers-El Casco	n/a	Modify	Rack	65
M17-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M18-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	123
M18-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	157
M18-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	127
M18-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	124
M19-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	136
M19-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	133
M19-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	148
M20-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M20-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	149
M20-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	125
M21-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	127
M21-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	124
M21-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	131
M21-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	127
M22-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	120
M22-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	130
M22-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	136
M22-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	133
M23-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	131
M23-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	155
M23-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	155
M24-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	143
M24-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	119
M24-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	144
M24-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	140
M25-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	145
M25-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	124
M25-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	145
M25-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	140
M26-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	137
M26-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	157
M26-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	151
M27-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	135
M27-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	156
M27-T3	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	144
M27-T4	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	126
M77-T3	Devers-San Bernardino No.1	n/a	Remove	LST	104
M78-T1	Devers-San Bernardino No.1	n/a	Remove	LST	90
M78-T2	Devers-San Bernardino No.1	n/a	Remove	LST	77
M78-T3	Devers-San Bernardino No.1	n/a	Remove	LST	82
M78-T4	Devers-San Bernardino No.1	n/a	Remove	LST	85
M79-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M79-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M79-T3	Devers-San Bernardino No.1	n/a	Remove	LST	90
M80-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M80-T2	Devers-San Bernardino No.1	n/a	Remove	LST	90
M80-T3	Devers-San Bernardino No.1	n/a	Remove	LST	102
M80-T4	Devers-San Bernardino No.1	n/a	Remove	LST	90
M81-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M81-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M81-T3	Devers-San Bernardino No.1	n/a	Remove	LST	85
M81-T4	Devers-San Bernardino No.1	n/a	Remove	LST	84
M82-T1	Devers-San Bernardino No.1	n/a	Remove	LST	82
M82-T2	Devers-San Bernardino No.1	n/a	Remove	LST	83
M82-T3	Devers-San Bernardino No.1	n/a	Remove	LST	95
M82-T4	Devers-San Bernardino No.1	n/a	Remove	LST	84
M83-T1	Devers-San Bernardino No.1	n/a	Remove	LST	89
M83-T2	Devers-San Bernardino No.1	n/a	Remove	LST	108
M83-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M84-T1	Devers-San Bernardino No.1	n/a	Remove	LST	102
M84-T2	Devers-San Bernardino No.1	n/a	Remove	LST	79
M84-T3	Devers-San Bernardino No.1	n/a	Remove	LST	102
M84-T4	Devers-San Bernardino No.1	n/a	Remove	LST	103
M85-T1	Devers-San Bernardino No.1	n/a	Remove	LST	102
M85-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M85-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M85-T4	Devers-San Bernardino No.1	n/a	Remove	LST	101
M86-T1	Devers-San Bernardino No.1	n/a	Remove	LST	88
M86-T2	Devers-San Bernardino No.1	n/a	Remove	LST	91
M86-T3	Devers-San Bernardino No.1	n/a	Remove	LST	103
M87-T1	Devers-San Bernardino No.1	n/a	Remove	LST	82
M87-T2	Devers-San Bernardino No.1	n/a	Remove	LST	88
M87-T3	Devers-San Bernardino No.1	n/a	Remove	LST	77
M87-T4	Devers-San Bernardino No.1	n/a	Remove	LST	78
M88-T1	Devers-San Bernardino No.1	n/a	Remove	LST	99
M88-T2	Devers-San Bernardino No.1	n/a	Remove	LST	102
PP#123274	Devers-El Casco	n/a	Remove	LST	96
PP#123275	Devers-El Casco	n/a	Remove	LST	95
PP#123276	Devers-El Casco	n/a	Remove	LST	96
PP#123277	Devers-El Casco	n/a	Remove	LST	95
PP#123278	Devers-El Casco	n/a	Remove	LST	85
PP#123279	Devers-El Casco	n/a	Remove	LST	94
PP#123280	Devers-El Casco	n/a	Remove	LST	86
PP#123281	Devers-El Casco	n/a	Remove	LST	86
PP#123282	Devers-El Casco	n/a	Remove	LST	95
PP#123283	Devers-El Casco	n/a	Remove	LST	96
PP#123284	Devers-El Casco	n/a	Remove	LST	96
PP#123285	Devers-El Casco	n/a	Remove	LST	85
PP#123286	Devers-El Casco	n/a	Remove	LST	84
PP#123287	Devers-El Casco	n/a	Remove	LST	85
PP#123288	Devers-El Casco	n/a	Remove	LST	85
PP#123289	Devers-El Casco	n/a	Remove	LST	85
PP#123290	Devers-El Casco	n/a	Remove	LST	86
PP#123291	Devers-El Casco	n/a	Remove	LST	85
PP#123292	Devers-El Casco	n/a	Remove	LST	95
PP#123293	Devers-El Casco	n/a	Remove	LST	96
PP#123294	Devers-El Casco	n/a	Remove	LST	95

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
PP#123295	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123296	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123297	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123298	Devers-El Casco	n/a	Remove	Wood Pole	73
PP#123299	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123300	Devers-El Casco	n/a	Remove	Wood Pole	71
PP#123301	Devers-El Casco	n/a	Remove	Wood Pole	73
PP#123302	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123303	Devers-El Casco	n/a	Remove	Wood Pole	74
PP#123304	Devers-El Casco	n/a	Remove	Wood Pole	70
PP#123305	Devers-El Casco	n/a	Remove	Wood Pole	76
PP#123306	Devers-El Casco	n/a	Remove	Wood Pole	71
PP#123307	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123308	Devers-El Casco	n/a	Remove	Wood Pole	76
PP#123309	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123310	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123311	Devers-El Casco	n/a	Remove	Wood Pole	72
PP#123312	Devers-El Casco	n/a	Remove	Wood Pole	83
PP#123313	Devers-El Casco	n/a	Remove	Wood Pole	88
PP#123314	Devers-El Casco	n/a	Remove	Wood Pole	76
PP#123315	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123316	Devers-El Casco	n/a	Remove	Wood Pole	76
PP#123317	Devers-El Casco	n/a	Remove	Wood Pole	76
PP#123318	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123318A	Devers-El Casco	n/a	Remove	Wood Pole	75
PP#123319	Devers-El Casco	n/a	Remove	Wood Pole	82
PP#123320	Devers-El Casco	n/a	Remove	Wood Pole	79
PP#123321	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123322	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123323	Devers-El Casco	n/a	Remove	Wood Pole	79
PP#123324	Devers-El Casco	n/a	Remove	Wood Pole	79
PP#123325	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123326	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123327	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123328	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123329	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123330	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123331	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123332	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123333	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123334	Devers-El Casco	n/a	Remove	Wood Pole	79
PP#123335	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123336	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123337	Devers-El Casco	n/a	Remove	Wood Pole	103
PP#123338	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123339	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123340	Devers-El Casco	n/a	Remove	Wood Pole	75
PP#123341	Devers-El Casco	n/a	Remove	Wood Pole	88
PP#123342	Devers-El Casco	n/a	Remove	Wood Pole	80
PP#123343	Devers-El Casco	n/a	Remove	Wood Pole	87
PP#123344	Devers-El Casco	n/a	Remove	Wood Pole	78
PP#123345	Devers-El Casco	n/a	Remove	Wood Pole	83
PP#123346	Devers-El Casco	n/a	Remove	Wood Pole	65
PP#123347	Devers-El Casco	n/a	Remove	Wood Pole	79

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
PP#123348	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123349	Devers-El Casco	n/a	Remove	Wood Pole	82
PP#123350	Devers-El Casco	n/a	Remove	Wood Pole	76
PP#123351	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123352	Devers-El Casco	n/a	Remove	Wood Pole	76
PP#123353	Devers-El Casco	n/a	Remove	Wood Pole	47
PP#123354	Devers-El Casco	n/a	Remove	Wood Pole	85
PP#123355	Devers-El Casco	n/a	Remove	Wood Pole	90
PP#123356	Devers-El Casco	n/a	Remove	Wood Pole	80

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
5N01	Devers-San Bernardino	Devers-El Casco	Proposed	LST	137
5N02	Devers-San Bernardino	Devers-El Casco	Proposed	LST	132
5N03	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
5N04	Devers-San Bernardino	Devers-El Casco	Proposed	LST	151
5N05	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
5N06	Devers-San Bernardino	Devers-El Casco	Proposed	LST	134
5N07	Devers-San Bernardino	Devers-El Casco	Proposed	LST	189
5N08	Devers-San Bernardino	Devers-El Casco	Proposed	LST	158
5N09	Devers-San Bernardino	Devers-El Casco	Proposed	LST	163
5N10	Devers-San Bernardino	Devers-El Casco	Proposed	LST	133
5N11	Devers-San Bernardino	Devers-El Casco	Proposed	LST	149
5N12	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
5N13	Devers-San Bernardino	Devers-El Casco	Proposed	LST	165
5N14	Devers-San Bernardino	Devers-El Casco	Proposed	LST	165
5N15	Devers-San Bernardino	Devers-El Casco	Proposed	LST	187
5N16	Devers-San Bernardino	Devers-El Casco	Proposed	LST	166
5N17	Devers-San Bernardino	Devers-El Casco	Proposed	LST	155
5N18	Devers-San Bernardino	Devers-El Casco	Proposed	LST	155
5N19	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
5N20	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
5N21	Devers-San Bernardino	Devers-El Casco	Proposed	LST	155
5N22	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
5N23	Devers-San Bernardino	Devers-El Casco	Proposed	LST	186
5N24	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
5N27	Devers-San Bernardino	Devers-El Casco	Proposed	LST	181
5N28	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
5N29	Devers-San Bernardino	Devers-El Casco	Proposed	LST	140
5N30	Devers-San Bernardino	Devers-El Casco	Proposed	LST	157
5N31	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
5N32	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
5N34	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
5N35	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
5N36	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
5N37	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
5N38	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
5N39	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	113
5N40	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
5N41	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
5N42	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
5N43	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	113
5N44	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	113
5N44A	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
5N45	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	118
5N46	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
5N47	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	133
5N48	Devers-San Bernardino	Devers-El Casco	Proposed	LST	166
5N49	Devers-San Bernardino	Devers-El Casco	Proposed	LST	184
5N52	Devers-San Bernardino	Devers-El Casco	Proposed	LST	182
5N54	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	178
5S01	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	136
5S02	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	134
5S03	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
5S04	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
5S05	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
5S06	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
5S07	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	192
5S08	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
5S09	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
5S10	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	134
5S11	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
5S12	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
5S13	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
5S14	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	158
5S15	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	187
5S16	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	167
5S17	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154
5S18	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
5S19	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
5S20	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	152
5S21	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	155
5S22	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
5S23	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	185
5S24	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
5S27	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
5S28	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	140
5S29	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	140
5S30	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154
5S31	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
5S32	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
5S34	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
5S35	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
5S36	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
5S37	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
5S38	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
5S39	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
5S40	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
5S41	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
5S42	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
5S43	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
5S44	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	113
5S44A	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
5S45	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	118
5S46	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	123
5S47	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	133
5S48	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
5S49	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	183
5S52	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
5S54	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	178
M10-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	138
M10-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	127
M10-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	151
M11-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	148
M11-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	133
M11-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	155
M12-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	152
M12-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	135
M12-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	147
M12-T4	Devers-El Casco	Devers-Vista No.2	Remove	LST	154

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M13-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	156
M13-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	157
M13-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	142
M14-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	127
M14-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	136
M14-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	132
M14-T4	Devers-El Casco	Devers-Vista No.2	Remove	LST	127
M15-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	122
M15-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	130
M15-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	130
M15-T4	Devers-El Casco	Devers-Vista No.2	Remove	LST	121
M16-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	127
M16-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	124
M16-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	145
M16-T4	Devers-El Casco	Devers-Vista No.2	Remove	LST	172
M16-T5	Devers-Vista No.1	n/a	Remove	LST	54
M17-T1	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	123
M17-T2	Devers-Vista No.1	Devers-Vista No.2	Remove	LST	136
M68-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M68-T4	Devers-San Bernardino No.1	n/a	Remove	LST	90
M69-T1	Devers-San Bernardino No.1	n/a	Remove	LST	83
M69-T2	Devers-San Bernardino No.1	n/a	Remove	LST	90
M69-T3	Devers-San Bernardino No.1	n/a	Remove	LST	98
M70-T1	Devers-San Bernardino No.1	n/a	Remove	LST	77
M70-T2	Devers-San Bernardino No.1	n/a	Remove	LST	80
M70-T3	Devers-San Bernardino No.1	n/a	Remove	LST	78
M71-T1	Devers-San Bernardino No.1	n/a	Remove	LST	96
M71-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M71-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M71-T4	Devers-San Bernardino No.1	n/a	Remove	LST	108
M72-T1	Devers-San Bernardino No.1	n/a	Remove	LST	90
M72-T2	Devers-San Bernardino No.1	n/a	Remove	LST	96
M72-T3	Devers-San Bernardino No.1	n/a	Remove	LST	89
M73-T1	Devers-San Bernardino No.1	n/a	Remove	LST	109
M73-T2	Devers-San Bernardino No.1	n/a	Remove	LST	90
M73-T3	Devers-San Bernardino No.1	n/a	Remove	LST	108
M74-T1	Devers-San Bernardino No.1	n/a	Remove	LST	80
M74-T2	Devers-San Bernardino No.1	n/a	Remove	LST	85
M74-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M74-T4	Devers-San Bernardino No.1	n/a	Remove	LST	80
M75-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M75-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M75-T3	Devers-San Bernardino No.1	n/a	Remove	LST	91
M75-T4	Devers-San Bernardino No.1	n/a	Remove	LST	84
M75-T5	Devers-San Bernardino No.1	n/a	Remove	LST	84
M76-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M76-T2	Devers-San Bernardino No.1	n/a	Remove	LST	79
M76-T3	Devers-San Bernardino No.1	n/a	Remove	LST	92
M76-T4	Devers-San Bernardino No.1	n/a	Remove	LST	78
M77-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M77-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M8-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	135
M8-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	148
M8-T4	Devers-El Casco	Devers-Vista No.2	Remove	LST	148

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M9-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	156
M9-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	150
M9-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	125
PP#123357	Devers-El Casco	n/a	Remove	Wood Pole	92
PP#123358	Devers-El Casco	n/a	Remove	Wood Pole	77
PP#123359	Devers-El Casco	n/a	Remove	Wood Pole	67
PP#123360	Devers-El Casco	n/a	Remove	Wood Pole	56
T155	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T156	Devers-Vista No.1	n/a	Remove	Wood Pole	103
T157	Devers-Vista No.1	n/a	Remove	Wood Pole	101
T158	Devers-Vista No.1	n/a	Remove	Wood Pole	84
T159	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T159A	Devers-Vista No.1	n/a	Remove	Wood Pole	74
T160	Devers-Vista No.1	n/a	Remove	Wood Pole	66
T161	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T162	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T163	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T164	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T165	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T166	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T167	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T168	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T169	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T170	Devers-Vista No.1	n/a	Remove	Wood Pole	64
T171	Devers-Vista No.1	n/a	Remove	Wood Pole	80
T172	Devers-Vista No.1	n/a	Remove	Wood Pole	76
T173	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T174	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T175	Devers-Vista No.1	n/a	Remove	Wood Pole	91
T181	Devers-Vista No.1	n/a	Remove	Wood Pole	83
T182	Devers-Vista No.1	n/a	Remove	Wood Pole	84
T183	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T184	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T185	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T186	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T187	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T188	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T189	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T190	Devers-Vista No.1	n/a	Remove	Wood Pole	76
T191	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T192	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T193	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T194	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T195	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T196	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T197	Devers-Vista No.1	n/a	Remove	Wood Pole	75
T198	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T199	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T200	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T201	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T202	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T203	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T204	Devers-Vista No.1	n/a	Remove	Wood Pole	68
T205	Devers-Vista No.1	n/a	Remove	Wood Pole	77

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
T206	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T207	Devers-Vista No.1	n/a	Remove	Wood Pole	87
T208	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T209	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T210	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T211	Devers-Vista No.1	n/a	Remove	Wood Pole	84
T212	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T213	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T214	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T215	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T216	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T217	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T217A	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T218	Devers-Vista No.1	n/a	Remove	Wood Pole	79
4175193E	Devers-Vista No.1	n/a	Remove	TSP	112
4175194E	Devers-Vista No.1	n/a	Remove	TSP	107
4175195E	Devers-Vista No.1	n/a	Remove	TSP	131
4175196E	Devers-Vista No.1	n/a	Remove	TSP	148
4175197E	Devers-Vista No.1	n/a	Remove	TSP	117

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
6N07	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	188
6N08	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	188
6N09	Devers-San Bernardino	Devers-El Casco	Proposed	LST	184
6N10	Devers-San Bernardino	Devers-El Casco	Proposed	LST	184
6N11	Devers-San Bernardino	Devers-El Casco	Proposed	LST	146
6N12	Devers-San Bernardino	Devers-El Casco	Proposed	LST	143
6N13	Devers-San Bernardino	Devers-El Casco	Proposed	LST	147
6N14	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
6N15	Devers-San Bernardino	Devers-El Casco	Proposed	LST	154
6N16	Devers-San Bernardino	Devers-El Casco	Proposed	LST	143
6N17	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
6N18	Devers-San Bernardino	Devers-El Casco	Proposed	LST	148
6N19	Devers-San Bernardino	Devers-El Casco	Proposed	LST	151
6N20	Devers-San Bernardino	Devers-El Casco	Proposed	LST	152
6N21	Devers-San Bernardino	Devers-El Casco	Proposed	LST	156
6N22	Devers-San Bernardino	Devers-El Casco	Proposed	LST	151
6N23	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
6N24	Devers-San Bernardino	Devers-El Casco	Proposed	LST	145
6N25	Devers-San Bernardino	Devers-El Casco	Proposed	LST	153
6N26	Devers-San Bernardino	Devers-El Casco	Proposed	LST	137
6N27	Devers-San Bernardino	Devers-El Casco	Proposed	LST	183
6N28	Devers-San Bernardino	Devers-El Casco	Proposed	LST	191
6N29	Devers-San Bernardino	Devers-El Casco	Proposed	LST	123
6N30	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	123
6N31	Devers-San Bernardino	Devers-El Casco	Proposed	TSP	158
6N32	Devers-San Bernardino	Devers-El Casco	Proposed	LST	179
6N34	Devers-San Bernardino	Devers-El Casco	Proposed	LST	166
6N35	Devers-San Bernardino	Devers-El Casco	Proposed	LST	188
6N37	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
6N38	Devers-San Bernardino	Devers-El Casco	Proposed	LST	160
6N39	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
6N40	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
6N41	Devers-San Bernardino	Devers-El Casco	Proposed	LST	139
6N42	Devers-San Bernardino	Devers-El Casco	Proposed	LST	137
6N43	Devers-San Bernardino	Devers-El Casco	Proposed	LST	142
6N44	Devers-San Bernardino	Devers-El Casco	Proposed	LST	148
6N45	Devers-San Bernardino	Devers-El Casco	Proposed	LST	150
6N46	Devers-San Bernardino	Devers-El Casco	Proposed	LST	163
6N47	Devers-San Bernardino	Devers-El Casco	Proposed	LST	182
6N48	Devers-San Bernardino	Devers-El Casco	Proposed	LST	162
6S07	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	188
6S08	Devers-Vista No.1	Devers-Vista No.2	Proposed	TSP	188
6S09	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
6S10	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	184
6S11	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	145
6S12	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
6S13	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	148
6S14	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
6S15	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	135
6S16	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	138
6S17	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
6S18	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	131
6S19	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	137
6S20	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
6S21	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	154
6S22	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	138
6S23	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	136
6S24	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
6S25	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
6S26	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	121
6S27	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	157
6S28	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	191
6S28A	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	180
6S29	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
6S30	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	122
6S30A	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
6S31	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	187
6S31A	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	180
6S32	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
6S33	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	153
6S34	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	142
6S35	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
6S36	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
6S37	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	161
6S38	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
6S39	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	181
6S40	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	165
6S41	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	130
6S42	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	120
6S43	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	144
6S44	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	149
6S45	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	151
6S46	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	164
6S47	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	182
6S48	Devers-Vista No.1	Devers-Vista No.2	Proposed	LST	163
DEVERS 6 LOW	Devers-Vista No.2	n/a	Modify	Rack	65
DEVERS 8 HIGH	Devers-El Casco	n/a	Modify	Rack	103
DEVERS 8 LOW	Devers-Vista No.1	n/a	Modify	Rack	60
DEVERS 9 LOW	Devers-San Bernardino	n/a	Modify	Rack	60
M0-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	187
M0-T2(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	154
M0-T2A	Devers-El Casco	Devers-Vista No.2	Remove	LST	165
M0-T3(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	162
M0-T4(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	150
M0-T5(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	145
M1-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	140
M1-T2(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	146
M1-T3(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	133
M1-T4(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	136
M2-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	129
M2-T2(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	137
M2-T3(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	138
M2-T4(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	134
M3-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	138
M3-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	115
M45-T1X	Devers-Vista No.1	n/a	Remove	LST	107
M45-T2X	Devers-Vista No.1	Devers-San Bernardino	Remove	LST	157
M45-T3X	Devers-Vista No.1	Devers-San Bernardino	Remove	LST	157

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
M4-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	129
M4-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	118
M4-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	117
M5-T1(1)	Devers-El Casco	Devers-Vista No.2	Remove	LST	138
M5-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	156
M5-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	149
M60-T1X	Devers-Vista No.1	Devers-San Bernardino	Remove	LST	157
M60-T2X	Devers-San Bernardino	n/a	Remove	LST	107
M60-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M61-T1	Devers-San Bernardino No.1	n/a	Remove	LST	89
M61-T2	Devers-San Bernardino No.1	n/a	Remove	LST	90
M61-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M61-T4	Devers-San Bernardino No.1	n/a	Remove	LST	78
M62-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M62-T2	Devers-San Bernardino No.1	n/a	Remove	LST	78
M62-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M62-T4	Devers-San Bernardino No.1	n/a	Remove	LST	85
M63-T1	Devers-San Bernardino No.1	n/a	Remove	LST	84
M63-T2	Devers-San Bernardino No.1	n/a	Remove	LST	78
M64-T1	Devers-San Bernardino No.1	n/a	Remove	LST	79
M64-T2	Devers-San Bernardino No.1	n/a	Remove	LST	82
M64-T3	Devers-San Bernardino No.1	n/a	Remove	LST	83
M65-T1	Devers-San Bernardino No.1	n/a	Remove	LST	81
M65-T2	Devers-San Bernardino No.1	n/a	Remove	LST	81
M65-T3	Devers-San Bernardino No.1	n/a	Remove	LST	89
M66-T1	Devers-San Bernardino No.1	n/a	Remove	LST	82
M66-T2	Devers-San Bernardino No.1	n/a	Remove	LST	88
M66-T3	Devers-San Bernardino No.1	n/a	Remove	LST	101
M66-T4	Devers-San Bernardino No.1	n/a	Remove	LST	89
M67-T1	Devers-San Bernardino No.1	n/a	Remove	LST	90
M67-T2	Devers-San Bernardino No.1	n/a	Remove	LST	77
M67-T3	Devers-San Bernardino No.1	n/a	Remove	LST	84
M68-T1	Devers-San Bernardino No.1	n/a	Remove	LST	83
M68-T2	Devers-San Bernardino No.1	n/a	Remove	LST	84
M6-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	158
M6-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	148
M6-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	155
M7-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	145
M7-T2	Devers-El Casco	Devers-Vista No.2	Remove	LST	128
M7-T3	Devers-El Casco	Devers-Vista No.2	Remove	LST	137
M7-T4	Devers-El Casco	Devers-Vista No.2	Remove	LST	128
M8-T1	Devers-El Casco	Devers-Vista No.2	Remove	LST	137
T219	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T220	Devers-Vista No.1	n/a	Remove	Wood Pole	91
T220A	Devers-Vista No.1	n/a	Remove	Wood Pole	102
T221	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T222	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T223	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T224	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T225	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T226	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T227	Devers-Vista No.1	n/a	Remove	Wood Pole	67
T228	Devers-Vista No.1	n/a	Remove	Wood Pole	61
T229	Devers-Vista No.1	n/a	Remove	Wood Pole	78

Structure No.	CIRCUIT 1	CIRCUIT 2	STATUS	Type	Height (Feet)
T230	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T231	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T232	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T233	Devers-Vista No.1	n/a	Remove	Wood Pole	72
T234	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T235	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T236	Devers-Vista No.1	n/a	Remove	Wood Pole	94
T237	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T238	Devers-Vista No.1	n/a	Remove	Wood Pole	89
T239	Devers-Vista No.1	n/a	Remove	Wood Pole	89
T240	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T241	Devers-Vista No.1	n/a	Remove	Wood Pole	80
T242	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T243	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T244	Devers-Vista No.1	n/a	Remove	Wood Pole	76
T245	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T246	Devers-Vista No.1	n/a	Remove	Wood Pole	80
T247	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T247A	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T248	Devers-Vista No.1	n/a	Remove	Wood Pole	73
T249	Devers-Vista No.1	n/a	Remove	Wood Pole	84
T250	Devers-Vista No.1	n/a	Remove	LST	79
T251	Devers-Vista No.1	n/a	Remove	LST	80
T252	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T252A	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T253	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T254	Devers-Vista No.1	n/a	Remove	Wood Pole	105
T255	Devers-Vista No.1	n/a	Remove	Wood Pole	83
T256	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T257	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T258	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T259	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T260	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T261	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T262	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T263	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T264	Devers-Vista No.1	n/a	Remove	Wood Pole	77
T265	Devers-Vista No.1	n/a	Remove	Wood Pole	76
T266	Devers-Vista No.1	n/a	Remove	Wood Pole	85
T267	Devers-Vista No.1	n/a	Remove	Wood Pole	82
T268	Devers-Vista No.1	n/a	Remove	Wood Pole	78
T269	Devers-Vista No.1	n/a	Remove	Wood Pole	81
T270	Devers-Vista No.1	n/a	Remove	Wood Pole	79
T271	Devers-Vista No.1	n/a	Remove	Wood Pole	80

Segment 1	
From Tower	**To Tower**
3N65	1E03
1W02	1W03

Segment 2	
From Tower	**To Tower**
3S65	2N01
2N01	2N02
2N02	2N04
2N04	2N06
2N06	2N07
2N07	2N08
2N08	2N10
2N10	2N11
2N11	2N12
2N12	2N14
2N15	2N16
2N18	2N20
2N32	2N33
2N35	2N36

Segment 3	
From Tower	**To Tower**
3N07	3N08
3N08	3N10
3N10	3N12
3N15	3N16
3N16	3N17
3N17	3N19
3N20	3N21
3N31	3N32
3N32	3N33
3N33	3N35
3N35	3N36
3N36	3N37
3N37	3N28
3N39	3N40
3N40	3N41
3N41	3N42
3N43	3N44
3N44	3N46
3N46	3N48
3N48	3N50
3N50	3N51
3N51	3N53
3N57	3N59
3N62	3N63
3N63	3N64
3N64	3N65
3S01	3S02
3S02	3S03
3S03	3S04
3S04	3S06
3S07	3S08
3S08	3S10
3S10	3S12
3S15	3S16
3S16	3S17
3S17	3S19
3S20	3S21
3S31	3S32
3S32	3S33
3S33	3S35
3S35	3S36
3S36	3S37
3S37	3S38
3S39	3S40
3S40	3S41
3S41	3S42
3S43	3S44
3S44	3S46
3S46	3S48
3S48	3S50
3S50	3S51
3S51	3S53
3S57	3S59
3S62	3S63
3S63	3S64
3S64	3S65

Segment 4	
From Tower	**To Tower**
4N01	4N02
4N02	4N03
4N03	4N04
4N04	4N05
4N10	4N12
4N12	4N13
4N37	4N38
4N54	4N55
4N55	4N56
4N56	4N57
4N57	4N58
4S01	4S02
4S02	4S03
4S03	4S04
4S04	4S05
4S10	4S12
4S12	4S13
4S37	4S38
4S54	4S55
4S55	4S56
4S56	4S57
4S57	4S58
4S58	4S59

Segment 5	
From Tower	**To Tower**
5N07	5N08
5N14	5N15
5N49	5N52
5N52	5N54
5S07	5S08
5S14	5S15
5S49	5S52
5S52	5S54

Segment 6	
From Tower	**To Tower**
6N27	6N28
6N28	6N29
6N29	6N30
6N30	6N31
6N31	6N32
6N34	6N35
6N35	6N37
6S27	6S28
6S28	6S28A
6S28A	6S29

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking / Lighting	City	Airspace Issues	Filing Note
1W00	N34 01 56.20	W117 14 31.00	1653	141	1794	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1W01	N34 01 12.00	W117 14 28.00	1634	98	1732	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1W02	N34 01 56.07	W117 14 24.00	1621	98	1719	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1W03	N34 02 10.33	W117 14 22.32	1552	144	1696	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1E03	N34 02 10.40	W117 14 21.54	1556	141	1697	Yes	Yes	Redlands	Exceeds Traffic Pattern	Filing Required-Airspace Issues
1W04	N34 02 21.53	W117 14 22.41	1301	154	1456	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E04	N34 02 21.54	W117 14 21.70	1301	156	1457	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E05	N34 02 30.01	W117 14 21.71	1267	140	1407	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W05	N34 02 30.01	W117 14 22.41	1268	141	1409	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E06	N34 02 35.88	W117 14 21.71	1253	132	1385	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W06	N34 02 35.88	W117 14 22.41	1254	132	1386	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E08	N34 02 45.28	W117 14 21.72	1218	135	1354	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W08	N34 02 45.28	W117 14 22.40	1219	135	1354	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E10	N34 02 55.16	W117 14 21.69	1185	158	1344	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W10	N34 02 55.16	W117 14 22.42	1185	158	1344	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W11	N34 03 2.65	W117 14 22.44	1165	146	1311	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E11	N34 03 2.66	W117 14 21.73	1166	146	1313	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E12	N34 03 10.33	W117 14 21.76	1152	131	1283	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W12	N34 03 10.33	W117 14 22.45	1150	132	1282	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E13	N34 03 16.94	W117 14 21.78	1145	126	1271	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W13	N34 03 16.99	W117 14 22.46	1145	125	1270	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E15	N34 03 25.22	W117 14 20.01	1139	128	1268	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W15	N34 03 25.26	W117 14 20.64	1139	128	1267	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E16	N34 03 31.09	W117 14 20.01	1138	119	1257	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W16	N34 03 31.09	W117 14 20.71	1137	120	1256	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W17	N34 03 38.44	W117 14 20.80	1132	129	1260	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E17	N34 03 38.440	W117 14 20.01	1133	129	1261	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E18	N34 03 45.20	W117 14 19.85	1128	147	1275	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W18	N34 03 45.21	W117 14 20.63	1128	147	1276	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E19	N34 03 51.66	W117 14 19.70	1126	144	1270	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W19	N34 03 51.66	W117 14 20.46	1125	144	1269	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W20	N34 03 57.05	W117 14 20.46	1123	157	1279	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E20	N34 03 57.06	W117 14 19.70	1123	157	1279	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W21	N34 04 5.74	W117 14 20.45	1120	151	1271	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E21	N34 04 05.74	W117 14 19.69	1121	149	1271	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E22	N34 04 14.04	W117 14 19.68	1119	132	1251	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W22	N34 04 14.04	W117 14 20.45	1119	133	1251	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E23	N34 04 21.45	W117 14 19.68	1117	126	1243	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W23	N34 04 21.45	W117 14 20.44	1117	126	1242	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W24	N34 04 29.75	W117 14 20.44	1116	126	1241	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E24	N34 04 29.76	W117 14 19.67	1116	126	1241	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W25	N34 04 37.56	W117 14 20.43	1115	138	1253	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E25	N34 04 37.57	W117 14 19.67	1116	138	1253	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E26	N34 04 41.18	W117 14 19.66	1118	156	1274	Yes	No	Redlands		Requires Filing - No Airspace Issues
1W26	N34 04 41.18	W117 14 20.43	1117	156	1273	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E27	N34 04 42.47	W117 14 19.24	1120	133	1253	Yes	No	Redlands		Requires Filing - No Airspace Issues
1E28	N34 04 42.46	W117 14 17.92	1120	133	1253	Yes	No	Redlands		Requires Filing - No Airspace Issues

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking / Lighting	City	Airspace Issues	Filing Note
2N01 (EX.)	N34 01 56.14	W117 14 27.80	1616	164	1780	No	Yes	Redlands	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N02 (EX.)	N34 01 59.82	W117 14 32.24	1622	172	1794	No	Yes	Redlands	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N04	N34 02 07.47	W117 14 51.43	1560	189	1749	No	Yes	Loma Linda	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N06	N34 02 13.54	W117 15 06.60	1535	143	1678	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N07	N34 02 14.23	W117 15 15.42	1509	167	1676	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N08	N34 02 14.70	W117 15 22.17	1553	124	1677	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N10	N34 02 15.67	W117 15 36.11	1464	161	1625	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N11	N34 02 16.16	W117 15 42.94	1514	139	1653	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N12	N34 02 16.84	W117 15 52.97	1571	137	1708	Yes	Yes	Loma Linda	Cat D Traffic Area	Filing Required-Airspace Issues
2N14	N34 02 04.35	W117 15 57.60	1499	113	1612	No	Yes	Loma Linda	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N15	N34 02 03.99	W117 16 11.17	1364	158	1522	No	Yes	Loma Linda	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N16	N34 02 03.66	W117 16 23.71	1395	113	1508	No	No	Colton		
2N17	N34 02 09.61	W117 16 30.10	1411	153	1564	No	Yes	Colton	Cat D Traffic Area	No Filing Required-But Recommended - Airspace Issues
2N18	N34 02 20.63	W117 16 41.36	1277	184	1461	No	No	Colton		
2N20	N34 02 22.64	W117 16 53.96	1150	182	1332	No	No	Colton		
2N21	N34 02 24.50	W117 17 05.13	1126	181	1307	No	No	Colton		
2N22	N34 02 27.61	W117 17 19.63	1225	134	1359	No	No	Colton		
2N23	N34 02 30.83	W117 17 26.71	1228	157	1385	No	No	Colton		
2N25	N34 02 34.02	W117 17 40.14	1098	157	1255	No	No	Colton		
2N26	N34 02 37.05	W117 17 52.43	1042	14	1056	No	No	Colton		
2N28 (EX.)	N34 02 41.60	W117 18 01.83	1003	156	1159	No	No	Colton		
2N29	N34 02 42.29	W117 18 10.35	996	150	1146	No	No	Colton		
2N30 (EX.)	N34 02 42.71	W117 18 15.71	1027	131	1158	No	No	Colton		
2N31 (EX.)	N34 02 43.75	W117 18 26.80	1015	147	1162	No	No	Colton		
2N32	N34 02 44.08	W117 18 31.27	982	155	1137	No	No	Colton		
2N33 (EX.)	N34 02 40.97	W117 18 44.98	928	158	1086	No	No	Colton		
2N34	N34 02 39.05	W117 18 53.16	923	181	1104	No	No	Colton		
2N35	N34 02 37.06	W117 19 01.45	920	155	1075	No	No	Colton		
2N36	N34 02 30.63	W117 19 03.64	1053	143	1196	No	No	Colton		
2N38	N34 02 31.29	W117 19 07.22	1041	168	1209	No	No	Colton		
2N37	N34 02 31.10	W117 19 07.25	1041	168	1209	No	No	Colton		

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
3N01	N33° 58' 04.42	W117° 04' 40.18	2054.9	132.52	2187.42	NO	NO	Redlands		
3S01	N33° 57' 51.65	W117° 04' 27.23	2128.66	175	2303.66	NO	NO	Redlands		
3S02	N33° 57' 50.41	W117° 04' 35.96	2248.52	128	2376.52	NO	NO	Redlands		
3N02	N33° 58' 05.61	W117° 04' 40.55	2052.5	129.37	2181.87	NO	NO	Redlands		
3S03	N33° 57' 49.78	W117° 04' 44.69	2176.61	163	2339.61	NO	NO	Redlands		
3N03	N33° 58' 02.24	W117° 04' 51.16	2219.23	139.5	2358.73	NO	NO	Redlands		
3S04	N33° 57' 47.46	W117° 04' 56.65	2297.52	181.35	2478.87	NO	NO	Redlands		
3N04	N33° 57' 59.22	W117° 04' 59.92	2255.8	127	2382.8	NO	NO	Redlands		
3S06	N33° 57' 51.96	W117° 05' 08.01	2094.01	143	2237.01	NO	NO	Redlands		
3N06	N33° 57' 54.98	W117° 05' 12.45	2085.25	116.4	2201.65	NO	NO	Redlands		
3N07	N33° 57' 57.55	W117° 05' 19.79	2083.55	181.7	2265.25	NO	NO	Redlands		
3S07	N33° 57' 56.92	W117° 05' 20.15	2086.98	191.7	2278.68	NO	NO	Redlands		
3N08	N33° 58' 00.34	W117° 05' 27.12	2169.14	145.2	2314.34	NO	NO	Redlands		
3S08	N33° 57' 59.83	W117° 05' 27.39	2172.81	163.1	2335.91	NO	NO	Redlands		
3N10	N33° 58' 05.28	W117° 05' 40.02	2124.06	181.3	2305.36	NO	NO	Redlands		
3S10	N33° 58' 04.90	W117° 05' 40.62	2124.16	190.9	2315.06	NO	NO	Redlands		
3N12	N33° 58' 10.23	W117° 05' 52.81	2091.75	134.5	2226.25	NO	NO	Redlands		
3S12	N33° 58' 09.97	W117° 05' 53.83	2100.53	134.9	2235.43	NO	NO	Redlands		
3N13	N33° 58' 14.06	W117° 06' 03.14	1998.53	180.7	2179.23	NO	NO	Redlands		
3S13	N33° 58' 13.56	W117° 06' 03.42	1999.79	181.9	2181.69	NO	NO	Redlands		
3N14	N33° 58' 17.30	W117° 06' 11.65	1992.11	158.9	2151.01	NO	NO	Redlands		
3S14	N33° 58' 16.79	W117° 06' 11.92	1996.15	158.7	2154.85	NO	NO	Redlands		
3N15	N33° 58' 20.97	W117° 06' 21.27	1977.3	165.6	2142.9	NO	NO	Redlands		
3S15	N33° 58' 20.47	W117° 06' 21.54	1980.74	188.6	2169.34	NO	NO	Redlands		
3N16	N33° 58' 24.71	W117° 06' 31.05	2089.3	123	2212.3	NO	NO	Redlands		
3S16	N33° 58' 23.94	W117° 06' 31.10	2098.96	138	2236.96	NO	NO	Redlands		
3N17	N33° 58' 28.71	W117° 06' 44.76	2096.23	153	2249.23	NO	NO	Redlands		
3S17	N33° 58' 28.27	W117° 06' 45.12	2104.03	163	2267.03	NO	NO	Redlands		
3N19	N33° 58' 33.19	W117° 07' 00.85	2084.88	127.2	2212.08	NO	NO	Redlands		
3S19	N33° 58' 32.68	W117° 07' 01.38	2087.1	126.5	2213.6	NO	NO	Redlands		
3S20	N33° 58' 34.46	W117° 07' 07.62	2071.82	127.5	2199.32	NO	NO	Redlands		
3N20	N33° 58' 35.29	W117° 07' 08.34	2061.31	128	2189.31	NO	NO	Redlands		
3S21	N33° 58' 38.64	W117° 07' 21.76	1938.55	143	2081.55	NO	NO	Redlands		
3N21	N33° 58' 39.31	W117° 07' 21.87	1929.82	143	2072.82	NO	NO	Redlands		
3N22	N33° 58' 41.93	W117° 07' 29.92	1863.41	181.6	2045.01	NO	NO	Redlands		
3S22	N33° 58' 41.38	W117° 07' 30.15	1867.52	190.6	2058.12	NO	NO	Redlands		
3N23	N33° 58' 44.78	W117° 07' 39.97	1882.19	144.2	2026.39	NO	NO	Redlands		
3S23	N33° 58' 44.39	W117° 07' 40.65	1895.28	135	2030.28	NO	NO	Redlands		
3N24	N33° 58' 47.78	W117° 07' 50.58	1832.18	164.2	1996.38	NO	NO	Redlands		
3S24	N33° 58' 47.26	W117° 07' 50.79	1834.42	164.6	1999.02	NO	NO	Redlands		
3N25	N33° 58' 50.78	W117° 08' 01.18	1849.61	130.5	1980.11	NO	NO	Redlands		
3S25	N33° 58' 50.25	W117° 08' 01.40	1849.65	129	1978.65	NO	NO	Redlands		
3N26	N33° 58' 53.49	W117° 08' 10.78	1816.99	153	1969.99	NO	NO	Redlands		
3S26	N33° 58' 52.97	W117° 08' 10.91	1818.97	153	1971.97	NO	NO	Redlands		
3N27	N33° 58' 55.64	W117° 08' 19.62	1815.22	146.5	1961.72	NO	NO	Redlands		
3S27	N33° 58' 55.11	W117° 08' 19.84	1827.3	131	1958.3	NO	NO	Redlands		
3N28	N33° 58' 59.08	W117° 08' 31.74	1818.43	134.2	1952.63	NO	NO	Redlands		
3S28	N33° 58' 58.45	W117° 08' 31.86	1815.35	151.25	1966.6	NO	NO	Redlands		
3N29	N33° 59' 04.08	W117° 08' 42.57	1736.03	191.5	1927.53	NO	NO	Redlands		
3S29	N33° 59' 03.60	W117° 08' 42.91	1739.59	191.8	1931.39	NO	NO	Redlands		
3N31	N33° 59' 08.96	W117° 08' 52.39	1810.16	127.4	1937.56	NO	NO	Redlands		
3S31	N33° 59' 08.41	W117° 08' 52.60	1812.49	133.8	1946.29	NO	NO	Redlands		
3S32	N33° 59' 12.60	W117° 09' 00.87	1898.04	129.4	2027.44	NO	NO	Redlands		
3N32	N33° 59' 13.34	W117° 09' 01.05	1868.09	134.3	2002.39	NO	NO	Redlands		
3S33	N33° 59' 16.03	W117° 09' 08.02"	1839.59	177	2016.59	NO	NO	Redlands		
3N33	N33° 59' 36.49	W117° 09' 32.55	1829.26	168.5	1997.76	NO	NO	Redlands		
3N35	N33° 59' 26.50	W117° 09' 27.27	1884.29	108	1992.29	NO	NO	Redlands		
3S35	N33° 59' 25.96	W117° 09' 27.50	1882.72	108	1990.72	NO	NO	Redlands		
3N36	N33° 59' 32.99	W117° 09' 40.27	1748.61	183	1931.61	NO	NO	Redlands		
3S36	N33° 59' 32.47	W117° 09' 40.53	1750.67	183	1933.67	NO	NO	Redlands		
3S37	N33° 59' 36.72	W117° 09' 49.370"	1824.28	132.4	1956.68	NO	NO	Redlands		
3N37	N33° 59' 37.44	W117° 09' 49.43	1799.78	136.3	1936.08	NO	NO	Redlands		
3N38	N33° 59' 43.66	W117° 10' 02.04	1843.59	124.5	1968.09	NO	NO	Redlands		
3S38	N33° 59' 43.19	W117° 10' 02.40	1842.53	127.2	1969.73	NO	NO	Redlands		
3N39	N33° 59' 47.70	W117° 10' 09.76	1806.92	158.7	1965.62	NO	NO	Redlands		
3S39	N33° 59' 47.06	W117° 10' 09.77	1811.63	157.1	1968.73	NO	NO	Redlands		
3N40	N33° 59' 56.54	W117° 10' 26.76	1891.27	131	2022.27	NO	NO	Redlands		

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
3S40	N33° 59' 56.07	W117° 10' 27.12	1894.06	132.3	2026.36	NO	NO	Redlands		
3N41	N34° 00' 01.51	W117° 10' 36.21	1772.69	191.4	1964.09	NO	NO	Redlands		
3S41	N34° 00' 00.95	W117° 10' 36.62	1775.91	192.2	1968.11	NO	NO	Redlands		
3N42	N34° 00' 08.61	W117° 10' 49.91	1904.16	124.1	2028.26	NO	NO	Redlands		
3S42	N34° 00' 08.29	W117° 10' 50.54	1905.1	124.7	2029.8	NO	NO	Redlands		
3N43	N34° 00' 11.17	W117° 10' 54.86	1901.55	136	2037.55	NO	NO	Redlands		
3S43	N34° 00' 10.58	W117° 10' 54.98	1901.19	136.1	2037.29	NO	NO	Redlands		
3S44	N34° 00' 16.35	W117° 11' 6.080"	1812.92	162.9	1975.82	NO	NO	Redlands		
3N44	N34° 00' 17.03	W117° 11' 06.15	1810.13	162.9	1973.03	NO	NO	Redlands		
3N46	N34° 00' 24.00	W117° 11' 19.64	1745.08	128	1873.08	NO	NO	Redlands		
3S46	N34° 00' 23.49	W117° 11' 19.85	1745.87	128	1873.87	NO	NO	Redlands		
3N48	N34° 00' 31.82	W117° 11' 34.59	1668.22	128.4	1796.62	NO	NO	Redlands		
3S48	N34° 00' 31.31	W117° 11' 35.01	1673.66	128.8	1802.46	NO	NO	Redlands		
3N50	N34° 00' 40.98	W117° 11' 52.23	1695.67	182.3	1877.97	NO	NO	Redlands		
3S50	N34° 00' 40.53	W117° 11' 52.77	1700.13	181.1	1881.23	NO	NO	Redlands		
3N51	N34° 00' 49.09	W117° 12' 08.04"	1665.23	163.9	1829.13	NO	NO	Redlands		
3S51	N34° 00' 48.63	W117° 12' 08.39	1668.78	159.2	1827.98	NO	NO	Redlands		
3S53	N34° 00' 54.51	W117° 12' 19.59	1588.96	153	1741.96	NO	NO	Redlands		
3N53	N34° 00' 55.17	W117° 12' 19.67	1590.17	153	1743.17	NO	NO	Redlands		
3N55	N34° 01' 02.89	W117° 12' 34.57	1560.54	152.2	1712.74	NO	NO	Redlands		
3S55	N34° 01' 02.42	W117° 12' 34.92	1560.13	158.5	1718.63	NO	NO	Redlands		
3N56	N34° 01' 08.42	W117° 12' 45.21	1601	139.05	1740.05	NO	NO	Redlands		
3S56	N34° 01' 07.95	W117° 12' 45.56	1600.15	140	1740.15	NO	NO	Redlands		
3N57	N34° 01' 13.73	W117° 12' 55.49	1594.62	166	1760.62	NO	NO	Redlands		
3S57	N34° 01' 13.24	W117° 12' 55.82	1600.95	161.7	1762.65	NO	NO	Redlands		
3N59	N34° 01' 21.85	W117° 13' 11.09	1605.44	153.7	1759.14	NO	NO	Redlands		
3S59	N34° 01' 21.38	W117° 13' 11.44	1607.68	153.5	1761.18	NO	NO	Redlands		
3N60	N34° 01' 27.47	W117° 13' 21.93	1592.2	161	1753.2	NO	NO	Redlands		
3S60	N34° 01' 27.00	W117° 13' 22.27	1594.47	161.6	1756.07	NO	NO	Redlands		
3N61	N34° 01' 32.19	W117° 13' 31.03	1623.25	151.7	1774.95	NO	NO	Redlands		
3S61	N34° 01' 31.72	W117° 13' 31.38	1637.88	151.6	1789.48	NO	NO	Redlands		
3N62	N34° 01' 36.96	W117° 13' 40.37	1652.93	156.4	1809.33	YES	YES	Redlands	Cat D Traffic	Filing Required-Airspace Issues
3S62	N34° 01' 36.50	W117° 13' 40.72	1648.21	181.3	1829.51	YES	YES	Redlands	Cat D Traffic	Filing Required-Airspace Issues
3N63	N34° 01' 45.28	W117° 13' 56.43	1672.88	124.3	1797.18	YES	YES	Redlands	Cat D Traffic	Filing Required-Airspace Issues
3S63	N34° 01' 44.72	W117° 13' 56.68	1679.35	124.3	1803.65	YES	YES	Redlands	Cat D Traffic	Filing Required-Airspace Issues
3N64	N34° 01' 49.44	W117° 14' 07.11	1603.34	163.2	1766.54	YES	YES	Redlands	Cat D Traffic	Filing Required-Airspace Issues
3S64	N34° 01' 48.90	W117° 14' 7.32	1616.1	163.7	1779.8	YES	YES	Redlands	Cat D Traffic	Filing Required-Airspace Issues
3N65	N34° 01' 54.01	W117° 14' 17.95	1588.52	139.64	1728.16	YES	YES	Redlands	Cat D Traffic	Filing Required-Airspace Issues
3S65	N34° 01' 53.69	W117° 14' 18.65	1589.1	180	1769.1	YES	YES	Redlands	Cat D Traffic	Filing Required-Airspace Issues

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
4N01	N33 56 50.85	W116 52 40.87	2689.7	160	2849.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4S01	N33 56 50.35	W116 52 40.87	2686.7	170	2856.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4S02	N 33 56 50.69	W116 52 49.68	2798.4	180	2978.4	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N02	N33 56 52.23	W116 52 49.97	2805	150	2955	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4S03	N33 56 50.42	W116 53 06.25	2888	165	3053	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N03	N33 56 50.92	W116 53 06.31	2892.8	154	3046.8	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4S04	N33 56 48.72	W116 53 25.27	2845.8	190	3035.8	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N04	N33 56 49.21	W116 53 25.32	2851.5	190	3041.5	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4S05	N33 56 46.74	W116 53 41.31	3025.7	125	3150.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N05	N33 56 47.34	W116 53 41.96	3027.4	125	3152.4	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N06	N33 56 47.26	W116 53 52.03	3012.1	141.6	3153.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4S06	N33 56 46.76	W116 53 52.04	3010.1	159.6	3169.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N07	N33 56 47.27	W116 54 03.41	2950.1	132.6	3082.7	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4S07	N33 56 46.78	W116 54 03.41	2949.6	126.6	3076.2	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N08	N33 56 47.29	W116 54 14.60	2978.2	122	3100.2	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4S08	N33 56 46.80	W116 54 14.60	2978.1	116	3094.1	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
4N09	N33 56 47.30	W116 54 25.80	2987.2	174.6	3161.8	No	No	Banning		
4S09	N33 56 46.81	W116 54 25.81	2985.6	159.6	3145.2	No	No	Banning		
4N10	N33 56 47.31	W116 54 36.20	3039.2	113	3152.2	No	No	Banning		
4S10	N33 56 46.82	W116 54 36.20	3037	116	3153	No	No	Banning		
4S12	N33 56 47.10	W116 54 54.85	2936.2	130	3066.2	No	No	Banning		
4N12	N33 56 47.63	W116 54 54.95	2927.9	138	3065.9	No	No	Banning		
4S13	N33 56 47.55	W116 55 04.85	2941.1	113	3054.1	No	No	Banning		
4N13	N33 56 48.05	W116 55 04.86	2948.7	125.5	3074.2	No	No	Banning		
4S14	N33 56 47.47	W116 55 15.49	2781.9	159.6	2941.5	No	No	Banning		
4N14	N33 56 47.97	W116 55 15.50	2785.2	162.6	2947.8	No	No	Banning		
4N15	N33 56 47.66	W116 55 26.81	2740.4	123.6	2864	No	No	Banning		
4S15	N33 56 47.17	W116 55 26.81	2738.9	129.6	2868.5	No	No	Banning		
4N16	N33 56 47.37	W116 55 37.68	2706	126.6	2832.6	No	No	Banning		
4S16	N33 56 46.88	W116 55 37.68	2703.8	126.6	2830.4	No	No	Banning		
4N17	N33 56 47.35	W116 55 48.60	2701.1	132.6	2833.7	No	No	Banning		
4S17	N33 56 46.85	W116 55 48.60	2698.9	135.6	2834.5	No	No	Banning		
4N18	N33 56 47.34	W116 55 59.72	2692.5	132.6	2825.1	No	No	Banning		
4S18	N33 56 46.84	W116 55 59.72	2690.7	132.6	2823.3	No	No	Banning		
4N19	N33 56 47.32	W116 56 10.68	2682.2	126.6	2808.8	No	No	Banning		
4S19	N33 56 46.83	W116 56 10.68	2680.4	129.6	2810	No	No	Banning		
4S20	N33 56' 46.82	W116 56' 21.23	2685.1	126.6	2811.7	No	No	Banning		
4N20	N33 56 47.31	W116 56 21.26	2686.2	129.6	2815.8	No	No	Banning		
4N21	N33 56' 47.29	W116 56' 32.65	2694	135.6	2829.6	No	No	Banning		
4S21	N33 56' 46.80	W116 56' 32.65	2692	138.6	2830.6	No	No	Banning		
4N22	N33 56' 47.34	W116 56' 43.64	2695.1	126.6	2821.7	No	No	Banning		
4S22	N33 56' 46.84	W116 56' 43.66	2693.7	123.6	2817.3	No	No	Banning		
4N23	N33 56' 47.56	W116 56' 54.95	2698.4	134	2832.4	No	No	Banning		
4S23	N33 56' 47.07	W116 56' 55.03	2698.3	137	2835.3	No	No	Banning		
4N24	N33 56' 50.79	W116 57' 08.80	2708.5	159.6	2868.1	No	No	Banning		
4S24	N33 56' 50.32	W116 57' 8.95	2707.4	153.6	2861	No	No	Banning		
4N25	N33 56' 53.97	W116 57' 22.93	2711.5	145	2856.5	No	No	Banning		
4S25	N33 56 53.44	W116 57 23.01	2710.9	151	2861.9	No	No	Banning		
4N26	N33 56 55348	W116 57 37.82	2706.8	174.6	2881.4	No	No	Banning		
4S26	N33 56 54.98	W116 57 37.87	2706	165.6	2871.6	No	No	Banning		
4N27	N33 56 57.18	W116 57 54.13	2698.6	174.6	2873.2	No	No	Banning		

4S27	N33 56 56.69	W116 57 54.24	2697.1	159.6	2856.7	No	No	Banning		
4N29	N33 56 58.95	W116 58 10.39	2679.9	174.6	2854.5	No	No	Banning		
4S29	N33 56 58.45	W116 58 10.46	2679.5	174.6	2854.1	No	No	Banning		
4N30	N33 57 00.46	W116 58 24.51	2660.9	130	2790.9	No	No	Banning		
4S30	N33 56 56.96	W116 58 24.51	2660	142	2802	No	No	Banning		
4N31	N33 57 00.42	W116 58 36.17	2642.9	129.6	2772.5	No	No	Banning		
4S31	N33 56 59.93	W116 58 36.18	2643.4	127.6	2771	No	No	Banning		
4N32	N33 57 00.40	W116 58 47.01	2624.5	159.6	2784.1	No	No	Banning		
4S32	N33 56 59.90	W116 58 47.04	2623.7	159.6	2783.3	No	No	Banning		
4S34	N33 56 59.80	W116 59 0.01	2626.2	155	2781.2	No	No	Banning		
4N34	N33 57 00.39	W116 59 01.00	2625.4	155	2780.4	No	No	Banning		
4N35	N33 57 03.24	W116 59 14.07	2580.6	159.6	2740.2	No	No	Banning		
4S35	N33 57 02.76	W116 59 14.23	2579.7	179.6	2759.3	No	No	Banning		
4N36	N33 57 05.78	W116 59 23.66	2608.7	135.6	2744.3	No	No	Banning		
4S36	N33 57 05.31	W116 59 23.84	2612.4	126.6	2739	No	No	Banning		
4N37	N33 57 09.16	W116 59 37.24	2597.6	174.6	2772.2	No	No	Banning		
4S37	N33 57 08.68	W116 59 37.41	2592.3	174.6	2766.9	No	No	Banning		
4N38	N33 57 12.21	W116 59 53.70	2584.4	174.6	2759	No	No	Banning		
4S38	N33 57 12.74	W116 59 53.86	2583.3	174.6	2757.9	No	No	Banning		
4N39	N33 57 16.63	W117 00 07.60	2565.9	135.6	2701.5	No	No	Banning		
4S39	N33 57 16.16	W117 00 07.77	2565.5	138.6	2704.1	No	No	Banning		
4N40	N33 57 18.82	W117 00 16.46	2564.7	126.6	2691.3	No	No	Banning		
4S40	N33 57 18.34	W117 00 16.63	2564.1	120.6	2684.7	No	No	Banning		
4N41	N33 57 21.70	W117 00 28.15	2556	153.6	2709.6	No	No	Banning		
4S41	N33 57 21.22	W117 00 28.32	2555.3	156.6	2711.9	No	No	Banning		
4N42	N33 57 25.36	W117 00 43.05	2535.1	150.6	2685.7	No	No	Banning		
4S42	N33 57 24.89	W117 00 43.22	2532.5	153.6	2686.1	No	No	Banning		
4N43	N33 57 28.56	W117 00 55.98	2519.4	161.6	2681	No	No	Banning		
4S43	N33 57 28.09	W117 00 56.15	2518.8	174.6	2693.4	No	No	Banning		
4N44	N33 57 32.14	W117 01 11.30	2493.6	155	2648.6	No	No	Banning		
4S44	N33 57 31.55	W117 01 11.43	2493.8	149	2642.8	No	No	Banning		
4N45	N33 57 34.87	W117 01 26.92	2466	155	2621	No	No	Banning		
4S45	N33 57 34.28	W117 01 27.06	2466.8	155	2621.8	No	No	Banning		
4N46	N33 57 37.34	W117 01 40.82	2442.6	144.6	2587.2	No	No	Banning		
4S46	N33 57 36.86	W117 01 40.94	2442.5	153.6	2596.1	No	No	Banning		
4N47	N33 57 38.95	W117 01 50.31	2423.8	159.6	2583.4	No	No	Banning		
4S47	N33 57 38.47	W117 01 50.44	2416	156.6	2572.6	No	No	Banning		
4N48	N33 57 41.24	W117 02 03.08	2403.5	179.6	2583.1	No	No	Banning		
4S48	N33 57 40.79	W117 02 03.18	2403.4	179.6	2583	No	No	Banning		
4N50	N33 57 44.54	W117 02 22.57	2371.8	174.6	2546.4	No	No	Banning		
4S50	N33 57 44.06	W117 02 22.68	2378.6	174.6	2553.2	No	No	Banning		
4N51	N33 57 46.79	W117 02 35.48	2359.9	174.6	2534.5	No	No	Banning		
4S51	N33 57 46.31	W117 02 35.61	2348.2	156.6	2504.8	No	No	Banning		
4N52	N33 57 48.10	W117 02 43.46	2382.6	138.6	2521.2	No	No	Banning		
4S52	N33 57 47.62	W117 02 43.59	2372.4	135.6	2508	No	No	Banning		
4N53	N33 57 49.61	W117 02 52.06	2380.8	145	2525.8	No	No	Banning		
4S53	N33 57 49.08	W117 02 52.20	2374.3	145	2519.3	No	No	Banning		
4N54	N33 57 51.67	W117 03 04.53	2423.5	153.6	2577.1	No	No	Banning		
4S54	N33 57 51.19	W117 03 04.67	2428.7	153.6	2582.3	No	No	Banning		
4N55	N33 57 53.88	W117 03 17.57	2421	157	2578	No	No	Banning		
4S55	N33 57 53.39	W117 03 17.99	2417.7	148	2565.7	No	No	Banning		
4N56	N33 57 56.20	W117 03 30.29	2388.2	175.5	2563.7	No	No	Banning		
4S56	N33 57 55.37	W117 03 30.70	2413.5	128	2541.5	No	No	Banning		

4S57	N33 57 58.14	W117 03 37.72	2384.7	128	2512.7	No	No	Banning		
4N57	N33 57 59.32	W117 03 37.87	2403	119	2522	No	No	Banning		
4N58	N33 57 59.85	W117 03 44.57	2360.1	125	2485.1	No	No	Banning		
4S58	N33 57 57.32	W117 03 51.87	2339.7	139	2478.7	No	No	Banning		
4N59	N33 58 02.42	W117 03 54.54	2127.5	125	2252.5	No	No	Banning		
4S59	N33 57 55.89	W117 04 00.78	2225.1	147	2372.1	No	No	Banning		
4N60	N33 58 05.05	W117 04 06.30	2076.3	135.6	2211.9	No	No	Banning		
4S60	N33 57 54.28	W117 04 10.82	2095.4	175	2270.4	No	No	Banning		
4N61	N33 58 07.80	W117 04 16.68	2066.6	141.6	2208.2	No	No	Banning		
4N62	N33 58 10.57	W117 04 26.26	2068.6	125	2193.6	No	No	Banning		
4N63	N33 58 07.69	W117 04 34.86	2043.1	134	2177.1	No	No	Banning		
4N65	N33 58 04.43	W117 04 37.52	2055	132.3	2187.3	No	No	Banning		
4N64	N33 58 06.20	W117 04 39.39	2045.8	134	2179.8	No	No	Banning		

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
5N01	N33 55 58.72	W116 43 17.94	1664	137	1801	No	No	Banning		
5S01	N33 55 58.21	W116 43 17.94	1661	136	1798	No	No	Banning		
5N02	N33 55 58.81	W116 43 28.86	1661	132	1793	No	No	Banning		
5S02	N33 55 58.26	W116 43 28.86	1658	134	1792	No	No	Banning		
5N03	N33 55 58.87	W116 43 41.38	1642	152	1794	No	No	Banning		
5S03	N33 55 58.31	W116 43 41.38	1640	155	1795	No	No	Banning		
5N04	N33 55 58.86	W116 43 54.95	1669	151	1820	No	No	Banning		
5S04	N33 55 58.31	W116 43 54.95	1667	153	1820	No	No	Banning		
5N05	N33 55 58.87	W116 44 08.56	1685	150	1835	No	No	Banning		
5S05	N33 55 58.31	W116 44 08.56	1682	154	1837	No	No	Banning		
5S06	N33 55 58.21	W116 44 20.51	1704	137	1841	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N06	N33 55 58.77	W116 44 20.52	1706	134	1840	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N07	N33 55 58.68	W116 44 32.26	1696	189	1885	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S07	N33 55 58.12	W116 44 32.26	1692	192	1884	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S08	N33 55 58.07	W116 44 42.77	1815	157	1972	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N08	N33 55 58.62	W116 44 42.78	1824	158	1981	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N09	N33 55 58.74	W116 44 52.94	1817	163	1981	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S09	N33 55 58.18	W116 44 52.94	1817	163	1980	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S10	N33 55 58.22	W116 45 02.75	1867	134	2000	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N10	N33 55 58.73	W116 45 02.76	1867	133	2000	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N11	N33 55 58.83	W116 45 17.22	1862	149	2012	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S11	N33 55 58.28	W116 45 17.54	1859	153	2013	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S12	N33 55 58.29	W116 45 31.50	1837	142	1979	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N12	N33 55 58.84	W116 45 31.51	1839	142	1981	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N13	N33 55 58.78	W116 45 43.52	1853	165	2018	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S13	N33 55 58.23	W116 45 43.52	1851	165	2016	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S14	N33 55 58.18	W116 46 00.96	1925	158	2083	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N14	N33 55 58.74	W116 46 00.97	1938	165	2103	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S15	N33 55 58.03	W116 46 15.40	1914	187	2101	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N15	N33 55 58.59	W116 46 15.41	1916	187	2103	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S16	N33 55 57.75	W116 46 29.64	1955	167	2121	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N16	N33 55 58.30	W116 46 29.69	1956	166	2122	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S17	N33 55 57.08	W116 46 43.73	2000	154	2154	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N17	N33 55 57.64	W116 46 43.77	2001	155	2156	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S18	N33 55 56.35	W116 46 58.95	2052	155	2207	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5N18	N33 55 56.90	W116 46 59.12	2054	155	2209	No	No	Banning	Potential Approach	No Filing Required-But Recommended -Airspace Issues
5S19	N33 55 55.56	W116 47 15.25	2101	182	2283	Yes	No	Banning		Requires Filing - No Airspace Issues
5N19	N33 55 56.12	W116 47 15.29	2104	181	2285	Yes	No	Banning		Requires Filing - No Airspace Issues
5S20	N33 55 55.21	W116 47 30.47	2134	152	2286	Yes	No	Banning		Requires Filing - No Airspace Issues
5N20	N33 55 55.77	W116 47 30.49	2137	152	2289	Yes	No	Banning		Requires Filing - No Airspace Issues
5N21	N33 55 55.67	W116 47 41.73	2146	155	2300	Yes	No	Banning		Requires Filing - No Airspace Issues
5S21	N33 55 55.11	W116 47 41.73	2143	155	2298	Yes	No	Banning		Requires Filing - No Airspace Issues
5N22	N33 55 55.68	W116 47 57.59	2164	181	2344	Yes	No	Banning		Requires Filing - No Airspace Issues
5S22	N33 55 55.12	W116 47 57.59	2161	182	2343	Yes	No	Banning		Requires Filing - No Airspace Issues
5N23	N33 55 55.70	W116 48 14.66	2162	186	2348	Yes	No	Banning		Requires Filing - No Airspace Issues
5S23	N33 55 55.15	W116 48 14.66	2157	185	2341	Yes	No	Banning		Requires Filing - No Airspace Issues
5N24	N33 55 55.73	W116 48 32.31	2147	181	2328	Yes	No	Banning		Requires Filing - No Airspace Issues
5S24	N33 55 55.17	W116 48 32.31	2145	182	2327	Yes	No	Banning		Requires Filing - No Airspace Issues
5N27	N33 55 55.76	W116 48 50.02	2092	181	2274	Yes	No	Banning		Requires Filing - No Airspace Issues

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
5S27	N33 55 55.20	W116 48 50.02	2091	181	2272	Yes	No	Banning		Requires Filing - No Airspace Issues
5S28	N33 55 55.20	W116 49 03.05	2086	140	2225	Yes	No	Banning		Requires Filing - No Airspace Issues
5N28	N33 55 55.76	W116 49 03.06	2086	139	2225	Yes	No	Banning		Requires Filing - No Airspace Issues
5N29	N33 55 55.82	W116 49 16.87	2069	140	2208	Yes	No	Banning		Requires Filing - No Airspace Issues
5S29	N33 55 55.29	W116 49 17.11	2066	140	2206	Yes	No	Banning		Requires Filing - No Airspace Issues
5N30	N33 56 01.93	W116 49 26.22	2087	157	2244	Yes	No	Banning		Requires Filing - No Airspace Issues
5S30	N33 56 01.39	W116 49 26.44	2085	154	2239	Yes	No	Banning		Requires Filing - No Airspace Issues
5S31	N33 56 01.29	W116 49 34.77	2091	123	2214	Yes	No	Banning		Requires Filing - No Airspace Issues
5N31	N33 56 01.83	W116 49 34.78	2093	123	2216	Yes	No	Banning		Requires Filing - No Airspace Issues
5S32	N33 56 01.15	W116 49 43.69	2098	118	2216	Yes	No	Banning		Requires Filing - No Airspace Issues
5N32	N33 56 01.69	W116 49 43.71	2100	118	2218	Yes	No	Banning		Requires Filing - No Airspace Issues
5S34	N33 56 01.00	W116 49 52.65	2106	123	2229	Yes	No	Banning		Requires Filing - No Airspace Issues
5N34	N33 56 01.55	W116 49 52.66	2106	123	2229	Yes	No	Banning		Requires Filing - No Airspace Issues
5S35	N33 56 00.89	W116 50 04.53	2128	123	2251	Yes	No	Banning		Requires Filing - No Airspace Issues
5N35	N33 56 01.43	W116 50 04.54	2130	123	2253	Yes	No	Banning		Requires Filing - No Airspace Issues
5N36	N33 56 01.42	W116 50 13.05	2145	123	2268	Yes	No	Banning		Requires Filing - No Airspace Issues
5S36	N33 56 00.88	W116 50 13.05	2143	123	2266	Yes	No	Banning		Requires Filing - No Airspace Issues
5N37	N33 56 01.41	W116 50 21.87	2164	118	2282	Yes	No	Banning		Requires Filing - No Airspace Issues
5S37	N33 56 00.87	W116 50 21.87	2162	118	2280	Yes	No	Banning		Requires Filing - No Airspace Issues
5N38	N33 56 01.58	W116 50 30.35	2184	118	2302	Yes	No	Banning		Requires Filing - No Airspace Issues
5S38	N33 56 00.86	W116 50 30.35	2185	118	2303	Yes	No	Banning		Requires Filing - No Airspace Issues
5N39	N33 56 01.52	W116 50 38.31	2207	113	2320	Yes	No	Banning		Requires Filing - No Airspace Issues
5S39	N33 56 00.98	W116 50 38.32	2207	113	2320	Yes	No	Banning		Requires Filing - No Airspace Issues
5N40	N33 56 01.64	W116 50 46.14	2226	118	2344	Yes	No	Banning		Requires Filing - No Airspace Issues
5S40	N33 56 01.10	W116 50 46.15	2226	118	2344	Yes	No	Banning		Requires Filing - No Airspace Issues
5N41	N33 56 01.77	W116 50 53.98	2247	118	2365	Yes	No	Banning		Requires Filing - No Airspace Issues
5S41	N33 56 01.22	W116 50 53.99	2246	118	2364	Yes	No	Banning		Requires Filing - No Airspace Issues
5N42	N33 56 01.89	W116 51 01.81	2269	118	2387	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5S42	N33 56 01.34	W116 51 01.81	2267	118	2385	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5N43	N33 56 01.88	W116 51 08.78	2286	113	2399	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5S43	N33 56 01.34	W116 51 09.09	2285	113	2398	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5N44	N33 56 06.15	W116 51 13.04	2312	113	2425	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5S44	N33 56 05.81	W116 51 13.55	2312	113	2425	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5N44A	N33 56 10.85	W116 51 17.74	2336	118	2454	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5S44A	N33 56 10.61	W116 51 18.25	2336	118	2454	Yes	Yes	Banning	VFR Horizontal	Filing Required-Airspace Issues
5N45	N33 56 15.61	W116 51 22.51	2361	118	2479	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5S45	N33 56 15.26	W116 51 23.01	2361	118	2479	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N46	N33 56 20.36	W116 51 27.28	2384	123	2507	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5S46	N33 56 20.02	W116 51 27.78	2385	123	2508	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N47	N33 56 25.15	W116 51 32.07	2411	133	2544	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5S47	N33 56 24.83	W116 51 32.60	2412	133	2545	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N48	N33 56 31.23	W116 51 37.74	2445	166	2612	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5S48	N33 56 30.88	W116 51 38.26	2446	163	2609	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N49	N33 56 38.58	W116 51 44.63	2474	184	2658	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5S49	N33 56 38.14	W116 51 45.06	2475	183	2658	Yes	Yes	Banning	VFR Conical	Filing Required-Airspace Issues
5N52	N33 56 48.96	W116 52 07.80	2587	182	2769	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
5S52	N33 56 48.42	W116 52 08.00	2587	182	2769	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
5S54	N33 56 49.62	W116 52 29.24	2640	178	2818	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues
5N54	N33 56 50.15	W116 52 29.30	2640	178	2818	Yes	Yes	Banning	Cat C Traffic	Filing Required-Airspace Issues

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
6N07	N33 55 59.56	W116 34 43.15	1067	188	38457	No	No	Desert Hot Springs		
6N08	N33 55 58.71	W116 34 44.39	1067	188	38432	No	No	North Palm Springs		
6N09	N33 55 58.71	W116 34 54.27	1075	184	38844	No	No	North Palm Springs		
6N10	N33 55 56.26	W116 34 55.47	1068	184	38681	No	No	North Palm Springs		
6N11	N33 55 56.23	W116 35 07.13	1108	146	39186	No	No	North Palm Springs		
6N12	N33 55 56.21	W116 35 18.97	1118	143	39718	No	No	North Palm Springs		
6N13	N33 55 56.19	W116 35 30.39	1103	147	40248	No	No	North Palm Springs		
6N14	N33 55 56.17	W116 35 41.89	1118	142	40798	No	No	North Palm Springs		
6N15	N33 55 57.91	W116 35 48.65	1140	154	41272	No	No	North Palm Springs		
6N16	N33 55 57.91	W116 35 59.75	1170	143	41825	No	No	White Water		
6N17	N33 55 57.98	W116 36 09.93	1200	152	42350	No	No	White Water		
6N18	N33 55 57.91	W116 36 21.74	1248	148	42960	No	No	White Water		
6N19	N33 55 57.70	W116 36 33.06	1295	151	43548	No	No	White Water		
6N20	N33 55 57.71	W116 36 43.81	1339	152	44133	No	No	White Water		
6N21	N33 55 57.65	W116 36 53.17	1371	156	43894	No	No	White Water		
6N22	N33 55 57.55	W116 37 04.32	1408	151	44524	No	No	White Water		
6N23	N33 55 57.50	W116 37 14.27	1442	142	45099	No	No	White Water		
6N24	N33 55 57.53	W116 37 24.23	1475	145	45688	No	No	White Water		
6N25	N33 55 57.21	W116 37 35.54	1537	153	46341	No	No	White Water		
6N26	N33 55 55.83	W116 37 48.80	1615	137	47061	No	No	White Water		
6N27	N33 55 54.81	W116 38 01.28	1687	183	47752	No	No	White Water		
6N28	N33 55 53.13	W116 38 49.93	2052	191	50750	No	No	White Water		
6N29	N33 55 51.93	W116 39 12.89	1927	123	52192	No	No	White Water		
6N30	N33 55 51.65	W116 39 25.63	1918	123	53643	No	No	White Water		
6N31	N33 55 50.63	W116 39 42.31	1822	158	54700	No	No	White Water		
6N32	N33 55 51.27	W116 40 06.35	1515	179	52987	No	No	White Water		
6N34	N33 55 52.31	W116 40 24.81	1478	166	51441	No	No	White Water		
6N35	N33 55 52.81	W116 40 43.79	1477	188	49848	No	No	White Water		
6N37	N33 55 52.83	W116 41 01.86	1528	150	48328	No	No	White Water		
6N38	N33 55 53.26	W116 41 15.01	1499	160	47226	No	No	White Water		
6N39	N33 55 53.56	W116 41 27.80	1495	150	46153	No	No	White Water		
6N40	N33 55 53.93	W116 41 40.30	1473	142	45104	No	No	White Water		
6N41	N33 55 54.19	W116 41 47.34	1469	139	45105	No	No	White Water		
6N42	N33 55 54.75	W116 41 56.79	1484	137	43726	No	No	White Water		
6N43	N33 55 55.11	W116 42 07.36	1515	142	42841	No	No	White Water		
6N44	N33 55 55.22	W116 42 18.05	1539	148	41944	No	No	White Water		
6N45	N33 55 55.74	W116 42 25.63	1560	150	41312	No	No	White Water		
6N46	N33 55 56.89	W116 42 40.07	1603	163	40110	No	No	White Water		
6N47	N33 55 58.33	W116 42 53.59	1640	182	38989	No	No	White Water		
6N48	N33 55 58.66	W116 43 06.26	1657	162	37930	No	No	White Water		
6S07	N33 55 59.56	W116 34 42.14	1066	188	37533	No	No	Desert Hot Springs		
6S08	N33 55 58.12	W116 34 44.14	1066	188	37490	No	No	North Palm Springs		
6S09	N33 55 58.10	W116 34 53.81	1074	182	37900	No	No	North Palm Springs		
6S10	N33 55 55.67	W116 34 55.01	1065	184	37742	No	No	North Palm Springs		
6S11	N33 55 55.64	W116 35 07.13	1107	145	38279	No	No	North Palm Springs		
6S12	N33 55 55.62	W116 35 18.97	1118	142	38824	No	No	North Palm Springs		
6S13	N33 55 55.60	W116 35 30.39	1101	148	39366	No	No	North Palm Springs		
6S14	N33 55 55.57	W116 35 41.82	1116	137	39923	No	No	North Palm Springs		
6S15	N33 55 53.49	W116 35 48.84	1121	135	40107	No	No	North Palm Springs		
6S16	N33 55 53.90	W116 35 59.84	1155	138	40704	No	No	White Water		
6S17	N33 55 54.34	W116 36 10.08	1187	142	41275	No	No	White Water		

Structure ID	Latitude (DMS)	Longitude (DMS)	Site Elevation (ASL)	Structure Height (AGL)	Total Height (AMSL)	Filing Required	Marking/ Lighting	City	Airspace Issues	Filing Note
6S18	N33 55 54.79	W116 36 21.73	1243	131	41933	No	No	White Water		
6S19	N33 55 55.24	W116 36 32.91	1283	137	42578	No	No	White Water		
6S20	N33 55 55.61	W116 36 43.42	1328	153	43190	No	No	White Water		
6S21	N33 55 56.11	W116 36 54.09	1368	154	43831	No	No	White Water		
6S22	N33 55 56.10	W116 37 04.35	1400	138	44419	No	No	White Water		
6S23	N33 55 56.12	W116 37 14.22	1436	136	44996	No	No	White Water		
6S24	N33 55 56.11	W116 37 23.68	1469	164	45553	No	No	White Water		
6S25	N33 55 54.12	W116 37 35.34	1537	163	46111	No	No	White Water		
6S26	N33 55 52.20	W116 37 46.60	1592	121	46664	No	No	White Water		
6S27	N33 55 50.11	W116 37 58.86	1673	157	47282	No	No	White Water		
6S28	N33 55 45.33	W116 38 40.87	1858	191	49661	No	No	White Water		
6S28A	N33 55 42.62	W116 38 55.69	1768	180	51097	No	No	White Water		
6S29	N33 55 38.31	W116 39 8.16	1428	181	51654	No	No	White Water		
6S30	N33 55 36.20	W116 39 20.37	1365	122	52346	No	No	White Water		
6S30A	N33 55 37.26	W116 39 29.14	1341	153	53003	No	No	White Water		
6S31	N33 55 38.32	W116 39 38.08	1314	187	53675	No	No	White Water		
6S31A	N33 55 39.40	W116 39 48.39	1265	180	54444	No	No	White Water		
6S32	N33 55 40.98	W116 40 00.31	1359	164	53447	No	No	White Water		
6S33	N33 55 42.44	W116 40 12.61	1361	153	52417	No	No	White Water		
6S34	N33 55 43.92	W116 40 25.05	1395	142	51376	No	No	White Water		
6S35	N33 55 45.56	W116 40 38.79	1361	165	50227	No	No	White Water		
6S36	N33 55 46.89	W116 40 52.65	1382	182	49068	No	No	White Water		
6S37	N33 55 48.72	W116 41 5.42	1447	161	48003	No	No	White Water		
6S38	N33 55 49.78	W116 41 14.15	1477	182	47275	No	No	White Water		
6S39	N33 55 49.16	W116 41 29.81	1467	181	45954	No	No	White Water		
6S40	N33 55 49.02	W116 41 39.71	1452	165	45121	No	No	White Water		
6S41	N33 55 48.62	W116 41 53.17	1451	130	43986	No	No	White Water		
6S42	N33 55 54.21	W116 41 58.03	1484	120	43617	No	No	White Water		
6S43	N33 55 54.56	W116 42 7.37	1511	144	42835	No	No	White Water		
6S44	N33 55 54.62	W116 42 18.11	1536	149	41934	No	No	White Water		
6S45	N33 55 55.19	W116 42 25.69	1558	151	40089	No	No	White Water		
6S46	N33 55 56.34	W116 42 40.13	1601	164	40100	No	No	White Water		
6S47	N33 55 57.75	W116 42 53.65	1639	182	38978	No	No	White Water		
6S48	N33 55 58.09	W116 43 06.28	1654	163	37922	No	No	White Water		