Written Comments Received During the Public Scoping Period

for the
Valley-Ivyglen and Alberhill Projects

Volume II

Comments from the Applicant: Southern California Edison

SOUTHERN CALIFORNIA EDISON®
An EDISON INTERNATIONAL® Company

Tammy Jones
Senior Attorney
Real Property, Local Government
Affairs and Licensing
tammy.jones@sce.com

July 15, 2016

VIA E-MAIL AND U.S. MAIL

California Public Utilities Commission
RE: VIG/ASP
c/o Ecology and Environment, Inc.
Attn: Rachel James
505 Sansome Street, Suite #300
San Francisco, California 94111

Re: Southern California Edison's Comments to the Draft Environmental Impact Report for the Alberhill System Project and Valley-Ivyglen Subtransmission Line Project

Dear Rachel:

This letter and accompanying attachments contain the comments of Southern California Edison Company (SCE) on the Draft Environmental Impact Report (DEIR) for the Alberhill System Project (Alberhill Project) and Valley-Ivyglen Subtransmission Line Project (VIG Project). SCE appreciates the time and effort that went into developing the DEIR and submits these comments in order to ensure that the analysis in the Final EIR is complete, accurate, and legally defensible. In light of these comments, SCE requests that the California Public Utilities Commission (CPUC) prepare a Final Environmental Impact Report that dismisses the Alberhill Project Alternative DD (Alternative DD) from consideration because it does not meet the project objectives and does not avoid or substantially lessen significant impacts of SCE's proposed Alberhill Project.

I. Overview Of SCE's Comments On The Draft EIR.

The DEIR, prepared on behalf of the CPUC, concludes that Alternative DD is the environmentally superior alternative for the Alberhill Project. This alternative, however, is infeasible because it does not meet the project objectives, does not reduce significant impacts as compared to the proposed Alberhill Project and is not cost effective.

In addition, the DEIR imposes numerous mitigation measures that are unnecessary and/or excessive, without recognizing that SCE has already committed to incorporating other project features that would minimize impacts to less than significant levels or avoid impacts all together. In certain instances, no demonstrated essential nexus exists between the mitigation measure and a

legitimate governmental interest.[1] As is demonstrated further below, elimination or modification of the mitigation measures that violate these well-established principles is necessary.

II. Legal Standards Governing The Analysis Of Project Impacts And Feasibility Of Alternative Projects.

The California Environmental Quality Act[2] (CEQA) and its implementing CEQA Guidelines[3] require that an EIR 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.…"[4]

CEQA does not establish a stringent limitation on the factors which a lead agency may consider when determining whether an alternative is feasible. Rather, CEQA provides that such a decision may rest on "economic, legal, social, technological, or other considerations."[5] Similarly, the CEQA Guidelines define "feasible" as: "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."[6]

III. Alternative DD Is Infeasible Because It Doesn't Meet the Project Objectives, Does Not Reduce Environmental Impacts Compared To The Proposed Project, And Is Not Cost Effective.

Alternative DD is beset by a variety of technical, environmental, legal and economic challenges and doesn't meet the project objectives, which render it infeasible as defined by CEQA. Alternative DD would include construction of a 500 kV substation on the Serrano Commerce site, which is located approximately five miles north of SCE's proposed Alberhill Project substation site. The 500 kV transmission lines would exit directly north from the substation and tie into the existing Serrano-Valley 500 kV transmission line. Similar to the proposed Alberhill Project, up to five 500 kV transmission lines and ten 115 kV subtransmission lines may need to connect to the substation at

---

[1] *See* Tit. 14, Cal. Code Regs. ("CEQA Guidelines") § 15126.4(a)(4)(B); *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994).

[2] Ca. Pub. Resources Code § 21000 *et seq*.

[3] CEQA Guidelines § 15000 *et seq.*

[4] *See* CEQA Guidelines § 15126.6(a).

[5] *See* Pub. Resources Code § 21081(a)(3).

[6] Pub. Resources Code § 21061.1; *see also* CEQA Guidelines § 15364.

final buildout.

However, as compared to the proposed Alberhill Project, at initial buildout, it will be necessary to construct an additional 10 miles of 115 kV circuits to connect the two existing 115 kV lines and the new Alberhill-Skylark 115 kV Line to the Serrano Commerce site (Attachment "A" provides an illustration of the proposed and alternative DD substation sites and the corresponding 115 kV lines). The 10 miles of 115 kV circuits would include the construction of four 1.3 mile double-circuit pole lines between Temescal Canyon Road and the Serrano Commerce site. Each pole line would contain a single 115 kV circuit necessary to connect the two existing 115 kV lines from Temescal Canyon Road to the substation. One of the 4 pole lines would also contain 1.3 miles of the new Alberhill-Skylark 115 kV Line. The Alberhill-Skylark 115 kV Line would continue southeast for an additional 4.0 miles from Temescal Canyon Road to the location of SCE's proposed Alberhill Substation site. This 5.3 mile distance is in addition to the length of the Alberhill-Skylark 115 kV Line as described in the DEIR. Any future additional 115 kV lines would have to travel from the Serrano Commerce site to the southeast in order to serve the load and would be 5.3 miles longer as compared to the line lengths of future 115 kV lines constructed from SCE's proposed Alberhill Substation site.

The additional 115 kV line lengths will result in, among other things, decreased reliability due to additional line exposure; additional impedance resulting in greater power losses; and increased operation and maintenance activities as compared to shorter 115 kV circuits associated with the proposed Alberhill Substation site. In addition, approximately two miles of new access roads and two additional staging areas would be needed, and a bridge may need to be upgraded or constructed to cross the Temescal Wash tributary adjacent to Temescal Canyon Road.

Further complications result from the fact Alternative DD is located at the furthest reaches of the Electrical Needs Area (ENA) with no expansion of the electrical system available to the north.[7] Geographic constraints (similar to a bottleneck freeway corridor between two hillsides) include sensitive biological habitat to the east and southeast, limited roadways in the southeasterly direction towards the load center, and the Cleveland National Forest to the west. These constraints would require each of the five initial 115 kV subtransmission lines to be constructed in a single corridor, which could significantly reduce reliability by exposing the five lines to outages due to singular contingent events such as fire, airplane collision, earthquake or landslide. In addition, these constraints may render any future 115 kV subtransmission lines infeasible.

[7] The Alberhill System lines are 115 kV and all substations to the north are served by the Mira Loma System, a 66 kV system which is incompatible with a 115 kV system.

A. Alternative DD Does Not Meet The CPUC's 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.[8] However, Alternative DD does not meet either the CPUC's objectives or SCE's basic objectives, both of which relate to: 1) relieving projected electrical demand; and 2) providing safe and reliable electrical service.

When evaluating potential substation sites, SCE takes into account numerous factors. One of the most important factors is the "electrical" location (i.e., where the site is placed within the electrical grid as a whole, as opposed to geographical location). Where the site is placed within the electrical grid can have significant effects on reliability, operational flexibility and energy losses, among other things. This is precisely why SCE chose the proposed Alberhill Substation site. There are approximately 7.5 miles between the Fogarty Substation and the Ivyglen Substation. The proposed Alberhill Substation is located approximately halfway between these two substations, allowing for optimal line route diversity. In other words, locating the substation site in this area allows SCE to extend the subtransmission lines north, south and east (once past the I-15 freeway).

Maintaining line route diversity is critical for both providing reliable electric service and serving electric demand in the ENA. If the subtransmission lines are concentrated in a single pathway, they are exposed to an extreme risk in the event of a singular event, such as fire, airplane collision, earthquake or landslide. If the lines are diverse, however, a single event may only affect one pole line (as opposed to a complete outage of all the lines). In addition, constraining the subtransmission lines to only one or a few possible corridors significantly limits the ability of the Alberhill Substation Project to serve demand within the ENA.

SCE's first project objective states that the Alberhill Project would "serve current and long-term projected electrical demand requirements in the Electrical Needs Area."[9] Serving electrical demand in the ENA includes adding substation transformer capacity, as well as providing a sufficient means to deliver that capacity to the distribution substations it serves. Though an equal amount of transformer capacity can be installed at both the Serrano-Commerce site and the proposed Alberhill Substation site, the limitation on the number of lines SCE can install from the Serrano Commerce site to serve the ENA due to the geographic constraints could strand transformer capacity. Similarly, SCE's fifth project objective states the Alberhill Project would "increase electrical system reliability by constructing a project in a location suitable to serve the Electrical Needs Area." Constraining all the lines to a single corridor, or at a minimum, a very few limited

[8] *See* CEQA Guidelines § 15126.6(a)-(b).

[9] *See* Draft EIR at p. 1-10 (Section 1.2.1.1, listing Applicant's Stated Objectives of the Proposed Alberhill Project); SCE's Proponents Environmental Assessment at p. 1-13 (Section 1.4, listing Basic Objectives).

pathways, does not increase reliability and likely reduces it. Accordingly, if the full capacity of the substation portion of the Alberhill Project were unable to be realized (due to an inability to construct the necessary 115 kV subtransmission lines required to distribute that capacity), this would not meet SCE's objective of locating the substation "in a location suitable to serve the Electrical Needs Area."

Alternative DD also does not meet the CPUC's project objectives of relieving projected electrical demand and providing safe and reliable electrical service.[10] The Serrano Commerce site, is located at the very northwest end of the ENA, approximately 1.5 miles away from the adjacent Mira Loma 66 kV System to the north. The Alberhill 115 kV System and the Mira Loma 66 kV System, however, are incompatible as they operate at different voltages. As a result, there is no advantage electrically in locating the Alberhill Substation further away from the load center that it would serve. The Alberhill System would never extend north because the two systems are electrically incompatible unless significant modifications were made to the Mira Loma System (including the conversion of 66 kV substations to 115 kV substations). Consequently, to utilize the capacity of Alberhill Substation, SCE would be forced to route all five of the initial 115 kV subtransmission lines south (as well as any future lines), creating a single corridor of lines and an extreme vulnerability to a complete outage in the event of a singular event.

Constraining the subtransmission lines in this manner can also inhibit operations and maintenance flexibility. Depending on the design of the corridor, planned outages of facilities adjacent to those being repaired or maintained may be required in order to ensure safe working conditions within the right-of-way.

Finally, SCE's proposed Alberhill Substation site is located midway between its existing Ivyglen and Fogarty 115/12 kV distribution facilities to serve local electrical demand. SCE could construct future 115/12 kV distribution facilities within the proposed Alberhill Substation site to serve future local distribution demand as necessary. Moving the substation to the Serrano Commerce site likely would require SCE to license a new 115/12 kV distribution substation near the proposed Alberhill Substation site because the distance of the Serrano Commerce site to the distribution demand would be too great for it to be effective. This would result in significant, unnecessary costs and additional environmental impacts compared to siting the project at the proposed Alberhill Substation site for which SCE would have the flexibility to simply install the necessary equipment and leverage the existing substation facilities.

[10] *See* Draft EIR at p. ES-2.

B. Alternative DD Does Not Reduce Environmental Impacts Compared To The Proposed Project.

The Draft EIR asserts that Alternative DD is considered environmentally superior in six resource areas.[11] However, Alternative DD does not substantially reduce environmental impacts. As noted above, CEQA requires that an EIR describe "a reasonable range of alternatives to 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…."[12] According to the DEIR, Alternative DD and the Proposed Project have significant and unavoidable impacts in three areas: (1) aesthetics, (2) air quality, and (3) noise. However, Alternative DD does not avoid or substantially lessen those significant impacts as compared to the Proposed Project. Rather, Alternative DD actually increases aesthetic and greenhouse gas impacts as compared to the Proposed Project.

1. Alternative DD Results In An Increase To Aesthetic Impacts As Compared To The Proposed Project.

The Draft EIR concludes that Alternative DD should be the environmentally superior alternative because, as compared to the SCE proposed Alberhill Project, Alternative DD is perceived to lessen impacts on aesthetics because "the extended 115-kV subtransmission line of ASP Alternative DD would be visible from I-15, but it would be far enough away from I-15 and would not encroach into the sky, so unlike the proposed project it would not dominate views from I-15."[13] This conclusion, however, is flawed.

The DEIR fails to account for increased disturbance and visual impacts associated with the longer subtransmission lines that will be needed in order to construct Alternative DD. As noted previously, because the Serrano Commerce site is located over five miles northwest of the proposed Alberhill Substation site, and at the furthest reaches of the ENA, in order to connect the Alberhill Substation to the two existing 115 kV lines and to construct the new Alberhill-Skylark 115 kV Line, there would be an increase of 10 miles in total length of the 115 kV circuitry. As shown in the visual simulation (attached hereto as Attachment "B"), this would result in a substantial aesthetic impact to both existing and future residents on either side of the I-15. Additionally, taller poles (a minimum of 10 feet taller) would be required to accommodate a double-circuit subtransmission line

[11] *See* Draft EIR at pp. 5-33 to 5-34.

[12] *See* CEQA Guidelines § 15126.6(a).

[13] *See* Draft EIR at pp. 5-28 to 5-29.

along Segments VIG6 and VIG7 to accommodate the Alberhill-Skylark 115 kV Line. These taller poles would be required only for Alternative DD and would further increase aesthetic impacts.

2. Alternative DD Would Increase Greenhouse Gas Emissions As Compared To The Proposed Project.

The Draft EIR selects Alternative DD as the environmentally superior alternative, in part, due to its finding that Alternative DD would have lower greenhouse gas emissions than those associated with the Proposed Project. The Draft EIR concludes that "[d]ue to the potentially grave impacts of greenhouse gas emissions, as recognized in the state's latest aggressive policy action to reduce greenhouse gases, ASP Alternative DD's decrease in greenhouse gas emissions is given substantial weight in determining the potentially Environmentally Superior Alternative."[14] This conclusion, however, is flawed.

Placing the substation at the far northwest edge of the ENA would lead to an *increase* in greenhouse gas emission impacts as compared to the proposed Alberhill Project, which was not accurately addressed in the Draft EIR. The Alberhill Project was designed so that at final build-out, five additional 115 kV lines could ultimately extend from the substation to substations further south within the Alberhill System. By relocating the substation more than five miles farther northwest than proposed by SCE, each of these lines would need to be extended for at least an additional 5.3 miles. Power losses along the transmission and distribution system, however, occur during the delivery of electricity. In general, the difference between what is produced and what is consumed constitutes transmission and distribution losses.[15] To compensate for transmission and distribution losses, more electricity needs to be generated to serve load.

Resistance represents friction and inhibits transfer capability of power. Resistance increases as length increases, so the losses will increase along longer distance lines. In addition, power losses increase exponentially as the current (Amps) flowing through the lines increases. If a subtransmission line were to serve multiple substations, the value of current in each segment of the line would be different. The current near the source (in this case Alberhill Substation) would be at its maximum, whereas the current entering the final substation it serves is at its minimum. In other words, moving the source substation farther away from the downstream substations it serves will significantly increase the losses.

---

[14] *See* Draft EIR at pp. 5-24 to 5-35.

[15] For example, if the transmission and distribution system has losses of 7 percent, 100 megawatt hours (MWh) of electricity produced at the power plant would provide only 93 MWh to the customer.

Construction of the substation on the Serrano Commerce site would increase the total circuit-mile length of the 115 kV lines from the substation to the downstream substations by 10 miles as compared to SCE's proposed substation location. Placement of the substation at the Serrano Commerce site would result in an annual increase in power losses of approximately 50% over SCE's proposed substation location.[16] During the first year of operation, this power loss amounts to nearly 4,000 additional MWhs of power that would need to be produced. This value is expected to increase annually as load served by the Alberhill System increases. To compensate for these MWh losses, SCE would be required to purchase additional power, which would indirectly result in increased greenhouse gas (GHG) emissions from the power generating sources.

Energy in MWhs can be converted to estimated GHG emissions using data representing the annual emissions data for each region. While there are many variables that would need to be considered in order to precisely quantify excess GHG emissions resulting from the line losses described above, the United States Environmental Protection Agency eGRID2012 report[17] can be used for illustrative purposes, to demonstrate that selection of the Serrano Commerce site will result in additional GHG impacts.[18]

Using this calculation, the initial 4,000 additional MWhs of power that would need to be produced to support the line losses caused by Alternative DD's relocation of the substation translates to the equivalent emissions that would result from 2.78 million miles driven by an average passenger vehicle in year one alone.[19] These emissions will only increase over the course of the project's lifecycle—along with the emissions associated with the increased energy use and

---

[16] Power losses occur along all segments of the system: transmission, subtransmission, and distribution. Power (watts) is the product of voltage (volts) and current (amps). For a common value of power transmitted along lines at different voltages, the segments operating at higher voltages have lower current values than those with lower voltages. While Alternative DD has shorter 500 kV line length than SCE's proposed project, the incremental differential in losses on the 500 kV transmission portion of the system due to the shorter lines is insignificant as compared to the differential in losses on the longer length of the 115 kV subtransmission portion of the system.

[17] Available at: https://www.epa.gov/sites/production/files/2015-10/documents/egrid2012_ghgoutputrates_0.pdf (last checked July 13, 2016).

[18] The eGRID2012 report identifies various subregions in the United States and identifies associated emissions values per MWh. In this report, the state of California is represented by the "WECC California" subregion and has an annual total output of carbon dioxide (CO_2) emissions of 650.31 lb/MWh based on the power production portfolio for the subregion.

[19] *See* U.S. Environmental Protection Agency, Greenhouse Gas Equivalencies Calculator website, *available at*: https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator (last checked July 13, 2016). 4,000 MWhs equates to 4,000,000 kWhs of electricity, which is the unit measurement used on the EPA's website. 4,000 MWhs multiplied by 650.31 lb/MWh is approximately 2.6 million pounds of CO_2.

unlike temporary construction impacts--the increased emissions would occur every year the project is in-service.

The DEIR, however, does not include this analysis and instead, erroneously concludes that Alternative DD would result in lower greenhouse gas emissions, based on its assumption that an 8% reduction in disturbance area would involve less equipment and helicopter use.[20] In addition to failing to address the GHG impacts of the line losses, the DEIR also fails to account for the additional GHG impacts associated with the additional two-mile access road required for the 1.3 mile 115 kV subtransmission lines that would be needed to connect the Serrano Commerce site to the existing 115 kV subtransmission lines at Temescal Canyon Road. Further, the DEIR does not account for the eight 500 kV towers that would be required to connect the Serrano Commerce substation site to the existing Serrano-Valley 500 kV transmission line. As a result, the disturbance area for Alternative DD is actually 2.7 acres greater than the Proposed Project. Alternative DD's greater disturbance area equates to greater GHG emissions during construction than SCE's proposed project. When the annual GHG emissions caused by Alternative DD's incremental line losses are also properly accounted for, it is clear that Alternative DD is not the environmentally preferred alternative on the basis of GHG emissions.

SCE agrees with the fact that reductions to greenhouse gases should be an important factor in determining the Environmentally Superior Alternative, and for this reason, and the reasons noted throughout these comments, the Alberhill Project as proposed by SCE should clearly be the Environmentally Superior Alternative.

3. Alternative DD Would Not Substantially Reduce Noise Impacts As Compared To The Proposed Project.

The Draft EIR concluded that noise impacts due to helicopter use for the 500 kV transmission line construction under Alternative DD would result in an overall reduced duration of significant unavoidable helicopter noise impacts when compared to the Proposed Project.[21] But, the noise impacts associated with Alternative DD would still remain significant and unavoidable. As noted above, however, CEQA requires an alternative to avoid or substantially lessen any of the significant effects of the project, which Alternative DD does not do in this case.

Moreover, the Draft EIR's analysis is flawed, as it erroneously assumes that Alternative DD would result in fewer noise impacts because there would be an 8% reduction in disturbance area, as

---

[20] *See* Draft EIR at p. 5-31.

[21] *See* Draft EIR at p. 5-32.

compared to the Proposed Project. Accordingly, the Draft EIR erroneously concludes that this would translate to less equipment use and less helicopter use for the 500 kV transmission line, resulting in fewer noise impacts. As noted above, however, the DEIR analysis failed to account for the additional construction of the 2-mile access road required for the 1.3 mile segment of the 115 kV subtransmission lines, or the construction of the additional eight 500 kV towers that would also be required. As such, Alternative DD's greater disturbance area would likely lead to greater noise impacts that the proposed project.

C. Alternative DD Would Delay The Project's In-Service Date And Would Not Be Cost Effective.

Alternative DD would cause delays to the project schedule and necessitate additional costs. Despite the fact SCE purchased the proposed Alberhill Substation site in 2009, the Draft EIR concludes that another site, the Serrano Commerce site, should be the environmentally preferred alternative. This site is not owned by SCE, but rather by a landowner previously unaware that the site was even being considered for the substation.

SCE has not had sufficient time to complete a full technical feasibility evaluation of Alternative DD or the necessary design and engineering work. The additional design and engineering work and additional material procurement (poles, conductor, hardware), would cause delays to the overall project in-service date of approximately two years. Furthermore, if the necessary engineering and scope definition is not completed until after the CPUC's decision is issued and Alternative DD is subsequently found to be technically infeasible or requiring additional 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 compliant. This process could add an additional 12 months of delay, further impacting schedule and cost.

SCE also has not had sufficient time to develop a thorough estimate of the costs associated with acquiring the Alternative DD site; however, based on conceptual level costs derived using the 2016 Final SCE Generator Interconnection Unit Cost Guide and appraisal research, SCE estimates the cost to purchase the new substation site, and the costs for additional work that may be needed as a result of the location of the substation (including but not limited to, right-of-way acquisitions and improvements, associated SCE substation work, SCE distribution work, SCE telecommunication work and environmental surveying), have the potential to exceed $50 million dollars. Additional cost drivers could also be identified after the necessary design and engineering are completed to a level equivalent to that which *has already* been completed for the proposed Alberhill Substation site. For these reasons, SCE expects that the cost of Alternative DD will be significantly higher than the cost of the proposed Alberhill Project.

On the bases of schedule delay and cost impact to ratepayers alone, Alternative DD should be rejected in the FEIR.

D. The Draft EIR Imposes Numerous Mitigation Measures That Are Unnecessary And Excessive.

Under CEQA, there must be an essential nexus between each mitigation measure and a legitimate governmental interest.[22] Furthermore, the mitigation measure must be roughly proportionate to the impacts caused by the project.[23] The mitigation measures imposed in the Draft EIR for both the Alberhill Project and the VIG Project violate these well-established principles.

Similar to the Proposed Projects, both of the alternatives chosen as the environmentally superior alternatives (for the VIG Project, Alternative C and for the Alberhill Project, Alternative DD) include, as part of those alternatives, mitigation measures that are not roughly proportionate to the impacts caused by the project and are infeasible. The CEQA Guidelines define "feasible" as: "capable of being accomplished in a successful manner within a reasonable period of time."[24] In this case, the timing of both the VIG Project and the Alberhill Project is critical because it implicates the primary objective of each Project. Compliance with certain of the mitigation measures proposed in the DEIR, however, prevent SCE from meeting the project objectives of serving current and long-term projected electrical demand by the respective operating dates. The operating date for the VIG Project is 2018 and is 2019 for the Alberhill Project. As discussed below, implementation of these mitigation measures will thwart achievement of the operating dates.

1. The Noise Mitigation Measures Contained In The Draft EIR Are Not Feasible.

Mitigation Measure NV-1 requires SCE, among many other onerous measures, to limit "the timeframes for heavy-duty equipment usage to less than 4 hours per day."[25] Depending on how heavy-duty equipment is defined, this limitation could extend the substation construction from 21 months to 42 months and increase the transmission and subtransmission line work from 28 months to 56 months. It would also have the potential to prolong the duration of temporary impacts to noise, traffic and aesthetics. These delays would prevent achievement of SCE's objective of serving current and long-term projected electrical demand by the operating dates, rendering it infeasible under CEQA.

Limiting construction activities is also unreasonable due to various practical considerations.

---

[22] *See* CEQA Guidelines § 15126.4(a)(4)(A); *Nollan v. California Coastal Comm'n*, 483 U.S. 825, 834-837 (1987).

[23] *See* CEQA Guidelines § 15126.4(a)(4)(B); *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994).

[24] CEQA Guidelines § 15364.

[25] *See* Draft EIR at p. 4.11-23.

Construction activities for both the Alberhill Project and the VIG Project, which include construction of the distribution getaways, transmission lines, subtransmission lines, and telecommunications components, are based on many factors, the largest being contractor and crew availability.

Using a typical 8-10 hour a day construction schedule, SCE has a high degree of certainty in knowing what contractors will be available and how those contractors' crews may be optimized. By contrast, limiting construction to only a half-day causes significant complications in terms of contractor and crew availability. Contractor bids will likely be much more costly (as SCE may be required to pay a minimum 8-hour day for 4 hours of work) and may also be more difficult to obtain since the contractors would be unable to optimize their crews and other work. If there are multiple contractors on a project where a 4-hour a day limitation is enforced, one construction delay could cause a ripple effect that would impact other contractors or contracts. Purchase change orders or amendments to contracts would then be necessary, which could significantly escalate project costs. Because of these concerns, the construction schedule may need to be pushed out even further than discussed above, should SCE be unable to secure the necessary contractors to construct the project who are willing to accept a four-hour workday.

Limiting construction to four hours a day is also impractical and unreasonable because it does not provide SCE with the flexibility it needs to adjust the schedule in order to respond to changing conditions in the field. Those field conditions could include, among other considerations, weather challenges, environmental challenges (e.g., nesting birds or other species or unanticipated discovery of cultural resources), or construction related challenges (e.g., SCE encounters bedrock that requires different equipment for excavation than was previously anticipated). Because all of these activities are interdependent on each other, SCE must have flexibility during construction of projects in order to get the projects constructed and meet the necessary operating dates.

For these reasons, the Mitigation Measure NV-1 is neither feasible nor roughly proportionate to the impacts caused by the project and should be eliminated in the Final EIR.

2. <u>The Air Quality Mitigation Measures Contained In The Draft EIR Are Unreasonable And Excessive</u>.

Mitigation Measure AQ-2 would require SCE to purchase Regional Clean Air Incentive Market Trading Credits (RTCs) for every pound of NOx in excess of the South Coast Air Quality Management District (SCAQMD) regional significance threshold of 100 pounds per day. However, the purchase of these offsets would be exorbitantly expensive compared to the purchase of alternative sources of credits, which would provide the same level of mitigation at substantially lower costs. Based on current market conditions, it is estimated that the cost to purchase NOx RTCs would amount to $6,000 per day ($1,000 per day for the VIG Project and $5,000 per day for the Alberhill Project). Whereas, the cost to purchase Mobile Source Emission Reduction Credits (MSERCs) would be just $600 per day ($100 per day for the VIG Project and $500 for the Alberhill Project). In addition, due to the newest RECLAIM shave and future required shave in NOx annual allowances, NOx RTCs may be harder to obtain, as it is likely facilities are reserving the credits for

their intended purpose.

Since the purchase of RTCs, MSERCs, or a combination thereof, would also provide the same level of mitigation at substantially lower costs, SCE should have the flexibility to purchase credits to offset its excess emissions from a variety of market sources. Including this flexibility would potentially reduce the cost of offsetting emissions in excess of the applicable thresholds. MSERCs are generally more accessible on the market and are a more cost effective option.

The above argument also applies to Mitigation Measure AQ-5, which requires SCE to purchase Emissions Trading Credits (ETCs) to offset emissions of volatile organic compounds (VOCs) and reactive organic gas (ROGs). The cost to purchase ETC would amount to approximately $1,000 per day ($250 per day for the VIG Project and $750 per day for the Alberhill Project). This is compared to purchasing Short Term Emission Reduction Credits (STERCs) or MSERCs, which would amount to only $100 per day ($25 per day for the VIG Project and $75 per day for the Alberhill Project) and would similarly provide the same level of mitigation. Accordingly, AQ-5 should be revised to provide SCE the flexibility to purchase ETCs, STERCs, MSERCs or a combination thereof, to offset excess emissions.

For these reasons, the Mitigation Measures AQ-2 and AQ-5 are neither feasible nor roughly proportionate to the impacts caused by the project and should be modified in the Final EIR to provide SCE with the flexibility to purchase alternative sources of emissions offset credits.

IV. Conclusion.

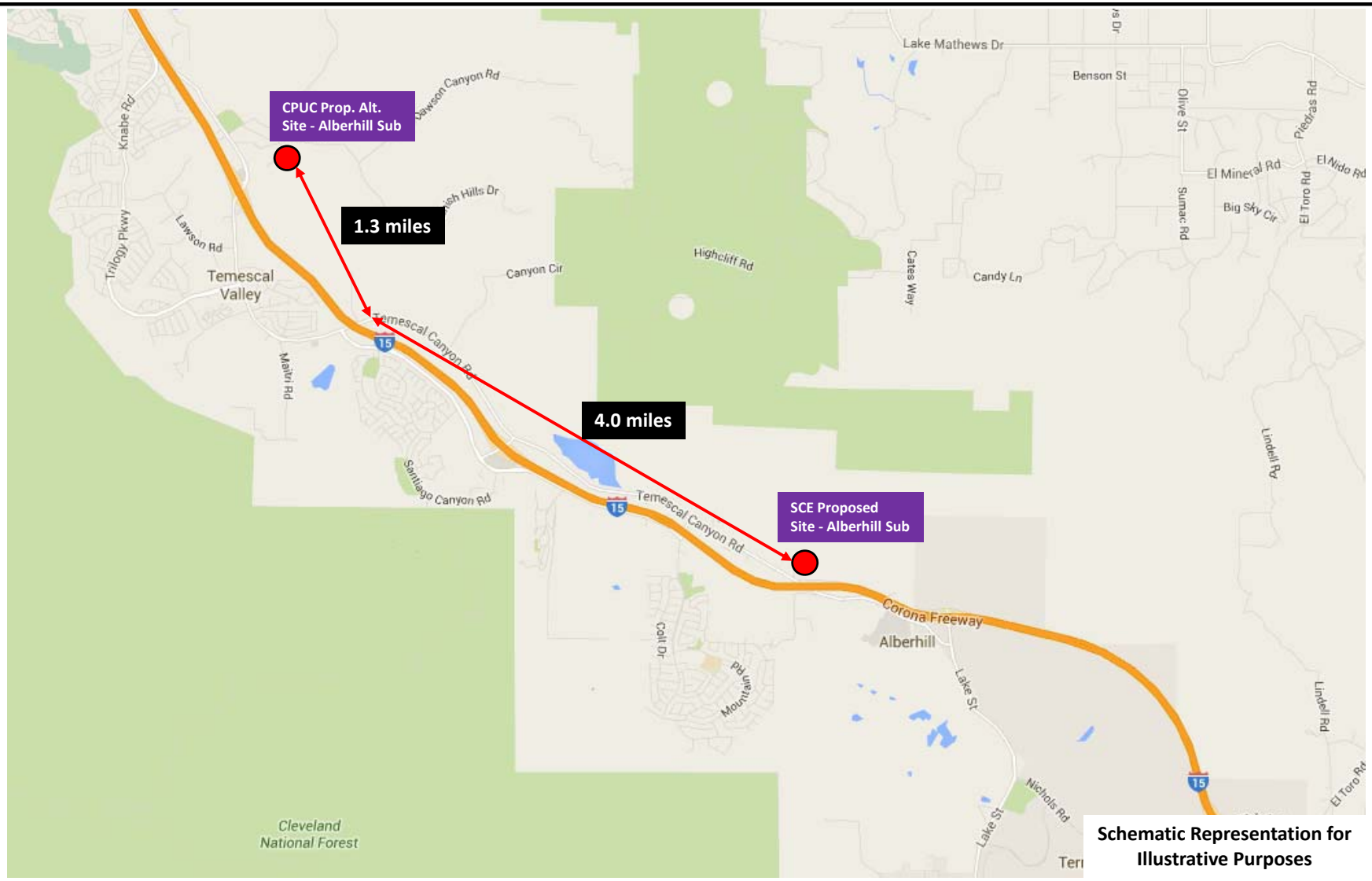
SCE has identified multiple issues associated with the DEIR's analysis associated with the Alberhill Alternative DD. As detailed in this letter and the associated attachments, Alternative DD is not feasible for failure to meet the project objectives, is not the environmentally superior alternative and should be discarded in the DEIR as a project alternative. In addition, several of the mitigation measures proposed in the DEIR for both the Alberhill Project and the VIG Project are both unnecessary and/or excessive and should be discarded or revised in the Final EIR. We appreciate the opportunity to provide this input that will ensure that the Final EIR is accurate.

Very truly yours,

Tammy Jones

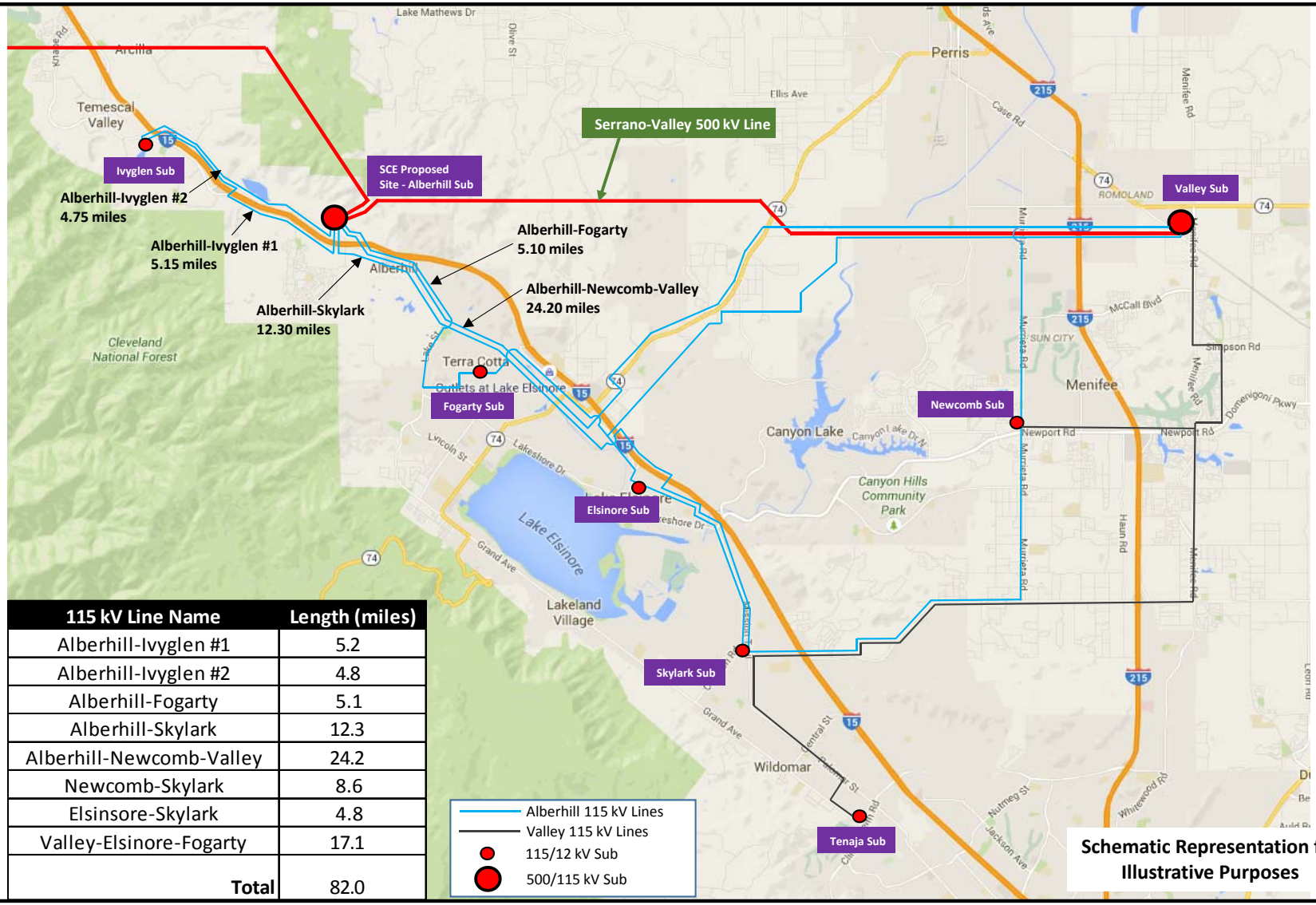
cc: Jensen Uchida

Enclosure(s)



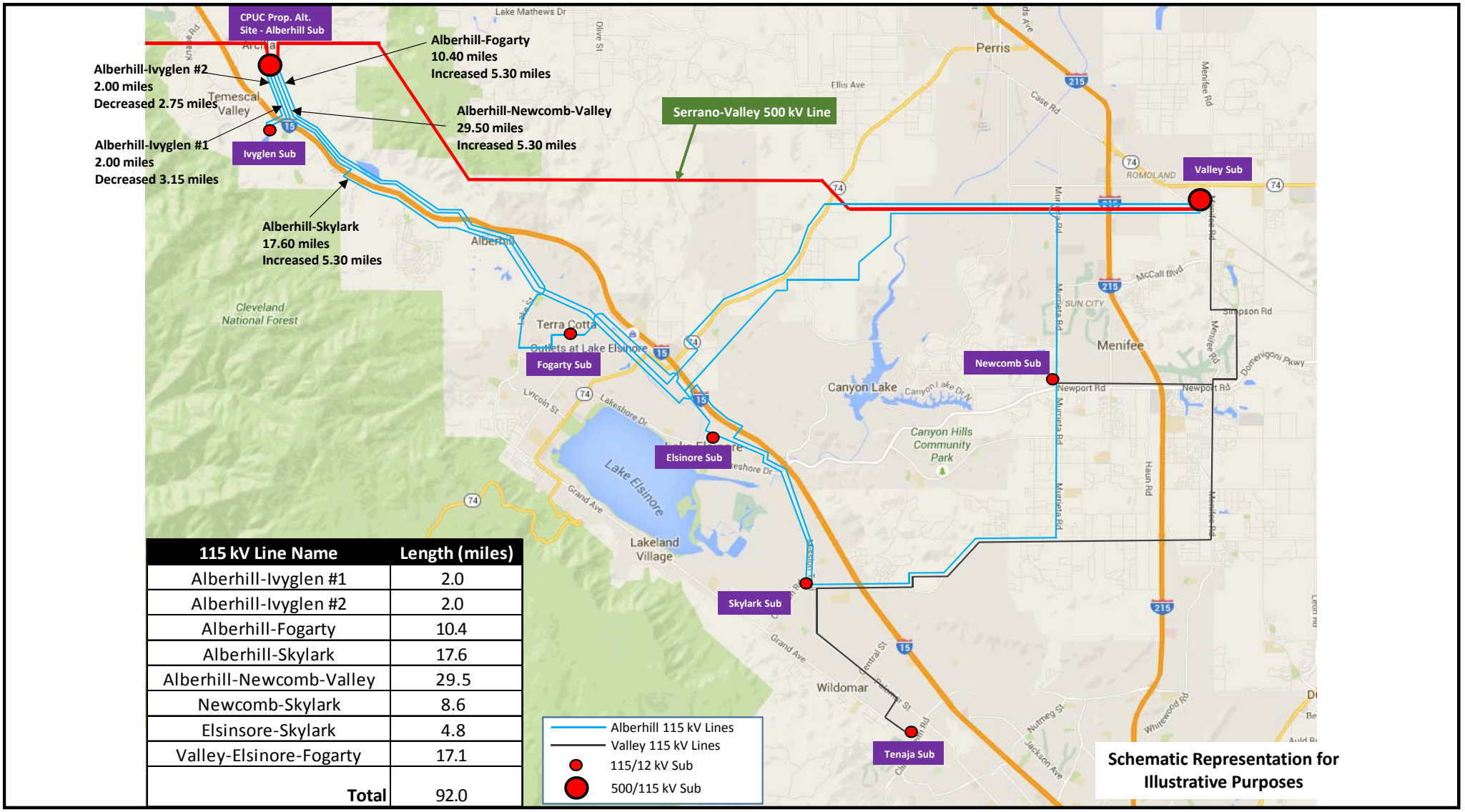
Attachment A - Illustration of the Proposed and Alternative DD Substation Sites and the Corresponding 115 kV lines

SCE Proposed Alberhill Substation Site



115 kV Line Name	Length (miles)
Alberhill-Ivyglen #1	5.2
Alberhill-Ivyglen #2	4.8
Alberhill-Fogarty	5.1
Alberhill-Skylark	12.3
Alberhill-Newcomb-Valley	24.2
Newcomb-Skylark	8.6
Elsinsore-Skylark	4.8
Valley-Elsinore-Fogarty	17.1
Total	82.0

CPUC Proposed Alberhill Substation Site



115 kV Line Name	Length (miles)
Alberhill-Ivyglen #1	2.0
Alberhill-Ivyglen #2	2.0
Alberhill-Fogarty	10.4
Alberhill-Skylark	17.6
Alberhill-Newcomb-Valley	29.5
Newcomb-Skylark	8.6
Elsinsore-Skylark	4.8
Valley-Elsinore-Fogarty	17.1
Total	92.0

Existing Conditions

Simulated View

Key Viewpoint (Alberhill Project Alt. DD Visual Simulation):
Northbound I-15 Looking Toward Proposed 115-kV Transmission Line
(115-kV Poles Near I-15 and Temescal Canyon Road)

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	Notice of Availability	2	In the Notice of Availability section, under Description of the Proposed Projects, Proposed Valley-Ivyglen Project it states: Construction of the proposed Valley–Ivyglen Project would take approximately 27 months. It is anticipated that the proposed Valley–Ivyglen Project would be operational by fall/winter 2018.	Per SCE project description edits submitted in September 2015, SCE suggests the following edits: Construction of the proposed Valley–Ivyglen Project would take approximately 28 ~~27~~ months. It is anticipated that the proposed Valley–Ivyglen Project would be operational by Q4 2019 ~~fall/winter 2018~~.
Alberhill	Notice of Availability	3	In the Notice of Availability section, under Description of the Proposed Projects, Proposed Alberhill Project it states: Construction of the proposed Alberhill Project would take approximately 28 months. It is anticipated that the proposed Alberhill Project would be operational by summer 2019.	Per SCE project description edits submitted in September 2015, SCE suggests the following edits: Construction of the proposed Alberhill Project would take approximately 28 months. It is anticipated that the proposed Alberhill Project would be operational by Q4 2020 ~~summer 2019~~.
Alberhill/ Valley-Ivyglen	Table ES-1	ES-4	Table ES-1	SCE suggests the edits per Attachment A
Valley-Ivyglen	1.0	1-1	Line 38 under heading Introduction states: "In addition, the telecommunications installations at Valley, Elsinore, and Ivyglen substations approved by CPUC Decision 10-08-009 have already been completed by the applicant (per Notice to Proceed #2 for the Fogarty Substation Construction) and are not considered in this document."	Please remove sentence as it conflicts with Section 2.3.1.4 on page 2-27. Per Section 2.3.1.4, telecommunications modifications are required at Valley and Ivyglen Substations. ~~"In addition, the telecommunications installations at Valley, Elsinore, and Ivyglen substations approved by CPUC Decision 10-08-009 have already been completed by the applicant (per Notice to Proceed #2 for the Fogarty Substation Construction) and are not considered in this document."~~
Alberhill	1.0	1-2	Line 28 under heading Introduction states: "It is anticipated the construction period for the proposed Alberhill Project would begin in spring 2017 and would end in summer of 2019."	As referenced throughout the comment table there will be numerous delays as a result of the new substation location. For instance, if the seller is unwilling, condemnation could push the schedule. In addition, if we are not able to secure a TEP, bio surveys would be delayed to Feb 2017 which would delay permits until Q1 2018. As a result, construction of the station would likely be delayed until Q1 2018 and the duration of construction could increase. SCE suggests the following edits:

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
				"It is anticipated the construction period for the proposed Alberhill Project would begin in ~~spring 2017~~ Q1 2018 and would end in ~~summer of 2019~~ Q4 2020."
Valley-Ivyglen	1.0	1-2	Line 27 under heading Introduction states: "It is anticipated the construction period for the proposed Valley-Ivyglen Project would begin in Fall 2016 and would end in fall or winter of 2018"	As a result of the underground mitigation measure for Seg2, the construction start is anticipated to be delayed and the construction duration is anticipated to be longer than originally planned. SCE suggests the following edits: "It is anticipated the construction period for the proposed Valley-Ivyglen Project would begin in Q1 2017 ~~Fall 2016~~ and would end in Q4 2019 ~~fall or winter of 2018~~."
Alberhill	1.0	1-2	Line 29 under heading Introduction states: "The proposed Valley-Ivyglen115-kVSubtransmission Line would connect to the proposed Alberhill Substation to create the Valley-Alberhill115-kV Subtransmission Line andAlberhill-Ivyglen115-kV Subtransmission Line."	The name of one of the new subtransmission lines is incorrect. SCE suggests the following edits: "The proposed Valley-Ivyglen 115-kV Subtransmission Line would connect to the proposed Alberhill Substation to create the ~~Valley-~~Alberhill-Newcomb-Valley 115-kV Subtransmission Line and Alberhill-Ivyglen 115-kV Subtransmission Line."
Valley-Ivyglen	1.1.1	1-3	Line 3 under heading Valley-Ivyglen Project states: "The purpose of the proposed Valley-Ivyglen Project is to ameliorate reliability concerns associated with the existing single 115-kVSubtransmissionline that serves Fogarty and Ivyglen substations as well as to eliminate the potential for 115-kV system overloads resulting from the loss of a 115-kV element within the Electrical Needs Area[5](Figure1-1)."	SCE suggests the following edits: "The purpose of the proposed Valley-Ivyglen Project is to ameliorate reliability concerns associated with the existing single 115-kVSubtransmissionline that serves Fogarty and Ivyglen substations as well as to eliminate the potential for 115-kV system overloads resulting from projected load growth as well as the potential loss of a 115-kV element within the Electrical Needs Area[5](Figure1-1)."
Valley-Ivyglen	1.1.1	1-3	Line 6 under heading Valley–Ivyglen Project states: "The proposed Valley–Ivyglen115-kVSubtransmissionLine would relieve loads on the existing Fogarty–Ivyglen115-kVSubtransmissionLine and provide a second source of power to Ivyglen Substation by creating a second 115-kV connection between Valley Substation and Ivyglen Substation."	SCE suggests the following edits: "The proposed Valley–Ivyglen115-kVSubtransmissionLine would relieve loads on the existing Valley-Elsinore-Fogarty–~~Ivyglen~~ 115-kVSubtransmissionLine and provide a second source of power to Ivyglen Substation by creating a second 115-kV connection between Valley Substation and Ivyglen Substation."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	1.1.1	1-3	Line 23 under heading Alberhill System Project states: "System ties between a new 115-kV System (i.e., the proposedAlberhill115-kV System served by the proposed Alberhill Substation) and the Valley South 115-kV System would be maintained such that either of these systems could be used to provide electricity in place of the other during maintenance, during emergency events, or to relieve other operational issues on one of these systems."	SCE suggests the following edits: "System ties between a new 115-kV System (i.e., the proposedAlberhill115-kV System served by the proposed Alberhill Substation) and the Valley South 115-kV System would be maintained such that the Valley South 115-kV System ~~either of these systems~~ could be used to provide electricity in place of the Alberhill 115-kV System ~~other~~ during maintenance, during emergency events, or to relieve other operational issues on one of these systems."
Valley-Ivyglen	1.1.3	1-3	Line 34 under heading, Background Information states: "The existing Valley–Elsinore–Fogarty 115-kVSubtransmissionLine extends between the applicant's Valley and Ivyglen substations within the Valley–South 115-kV System"	SCE suggests the following edits: "The existing Valley–Elsinore–Fogarty 115-kVSubtransmissionLine extends between the applicant's Valley, Elsinore and Fogarty ~~Ivyglen~~ substations within the Valley–South 115-kV System"
Alberhill/ Valley-Ivyglen	1.1.1.1	1-5	Line 7 under heading Electrical Demand Planning states: "The applicant's forecasts are based on annual forecasts prepared by the California Energy Commission."	SCE suggests the following edits: The applicant's forecasts are based on annual forecasts prepared by SCE ~~the California Energy Commission~~ incorporating load growth data specific to the project's Electrical Needs Area.
Valley-Ivyglen	1.1.1.1	1-5	Line 17 under heading Electrical Demand Planning states: "The applicant applies the 1-in-10-year heat storm temperature to planning for 115-kVsubtransmissionlines within the Valley–South 115-kV System, such as the Valley–Elsinore–Fogarty–Ivyglen115-kVSubtransmission Line"	SCE suggests the following edits: "The applicant applies the 1-in-5~~10~~-year heat storm temperature to planning for 115-kV subtransmission lines within the Valley–South 115-kV System, such as the Valley–Elsinore–Fogarty~~–Ivyglen~~115-kV Subtransmission Line"
Alberhill	1.1.1.2	1-5	Line 40 under heading, About Valley Substation and The Valley South 115-kV System states:	The fifth, stand by, transformer has already been placed at Valley Substation. SCE suggests the following edits:

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
			"The stand by transformer would be the fifth transformer to be installed at Valley Substation, but only the other four existing transformers are intended to be load-carrying transformers."	"The stand by transformer is ~~would be~~ the fifth transformer to be installed at Valley Substation, but only the other four ~~existing~~ transformers are intended to be load-carrying transformers."
Alberhill	1.1.1.2	1-5	Line 44 under heading, About Valley Substation and The Valley South 115-kV System states: "The spare transformer would be installed to comply with the applicant's internal Transmission Planning Criteria and Guidelines."	The spare transformer has already been installed. SCE suggests the following edits: "The spare transformer was ~~would be~~ installed to comply with the applicant's internal Transmission Planning Criteria and Guidelines."
Alberhill/ Valley-Ivyglen	1.1.1.2	1-5	Footnote 7 states: "Additional substations are also proposed for addition to the Valley North 115-kV System as part of other projects proposed by the applicant."	The additional substations referenced in footnote 7 have been constructed since SCE filed the applications making this footnote unnecessary. Please delete Footnote 7: ~~Additional substations are also proposed for addition to the Valley North 115-kV System as part of other projects proposed by the applicant.~~
Alberhill	1.1.1.3	1-6	Line 12 under heading Applicability of Transmission Planning Standards to the Proposed Projects states: "…by the California Independent System Operator (CAISO). The CAISO adheres to WECC planning standard, and WECC is one…."	SCE suggests the following edits: "…by the California Independent System Operator (CAISO). The CAISO adheres to NERC/WECC/CAISO planning standards, and WECC is one…"
Alberhill	1.1.1.4	1-7	Line 8 under heading Operational Flexibility states: "The applicant finds that its inability to transfer load from the Valley South 115-kV System to another 115-kV system limits the operational flexibility of the Valley South 115-kV System, which increases the potential for electrical service interruptions in the event that a component of the Valley South 115-kV System malfunctions (e.g., the operating limit of a 500/115-kV transformer is exceeded)."	SCE suggests the following edits: "The applicant finds that its inability to transfer load from the Valley South 115-kV System to another 115-kV system limits the operational flexibility of the Valley South 115-kV System, which increases the potential for electrical service interruptions in the event that a component of the Valley South 115-kV System malfunctions or in the event that customer demand exceeds equipment capacity (e.g., the operating limit of a 500/115-kV transformer is exceeded)."
Valley-Ivyglen	1.1.1.5	1-7	Line 19 under heading Projected Demand on the Valley-Elsinore-Fogarty 115-kV Subtransmission Line states:	SCE suggests the following edits:

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
			"During its planning processes for the Valley South 115-kV System, the applicant determined that electrical demand on the Valley–Elsinore segment of the Valley–Elsinore–Fogarty 115-kV Subtransmission Line could exceed operating limits during a 1-in-10 year heat storm by 2016 (Table 1-2)"	"During its planning processes for the Valley South 115-kV System, the applicant determined that electrical demand on the Valley ~~–Elsinore~~ segment of the Valley–Elsinore–Fogarty 115-kV Subtransmission Line could exceed operating limits during a 1-in-5~~10~~ year heat storm by 2016 (Table 1-2)"
Valley-Ivyglen	1.1.1.5	1-7	Footnote 8 states: "For the applicant's projection provided for this document, only the Valley–Elsinore–Fogarty segment of the line was identified."	SCE suggests the following edits: "For the applicant's projection provided for this document, only the Valley~~–Elsinore–Fogarty~~ segment of the line was identified."
Valley-Ivyglen	1.1.1.5	1-8	Table 1-2	The numbers provided by SCE for Table 1-2 relate to 1-in-5 heat storm as such SCE suggests the edits as shown in the Attachment B
Valley-Ivyglen	1.2.1	1-9	Line 18-19 – Under heading Objectives of the Proposed Valley–Ivyglen Project states: "...was presented by the applicant in terms of projected demand on the existing Valley-Elsinore-Fogarty-Ivyglen115 kV Subtransmission Line."	SCE suggests the following edits: "...was presented by the applicant in terms of projected demand on the existing Valley-Elsinore-Fogarty~~-Ivyglen~~115 kV Subtransmission Line."
Valley-Ivyglen	1.2.1	1-9	Line 10 under heading Objectives of the Proposed Valley-Ivyglen Project states: "The basic objectives of the proposed Valley–Ivyglen Project are to: • Serve projected electrical demand requirements in the Electrical Needs Area (ENA); • Increase electrical reliability to ENA by providing a direct connection between the Applicant's Valley 500/115-kV Substation and Ivyglen 115/12-kV Substation; and • Improve operational and maintenance flexibility on subtransmission lines without interruption of service."	To be consistent with Section 3.3.6.2, SCE suggests the following edits: "The basic objectives of the proposed Valley–Ivyglen Project are to: • Serve projected electrical demand requirements in the Electrical Needs Area (ENA); • Increase electrical reliability to ENA by providing a direct connection between the Applicant's Valley 500/115-kV Substation and Ivyglen 115/12-kV Substation; and • Improve operational and maintenance flexibility on subtransmission lines without interruption of service.

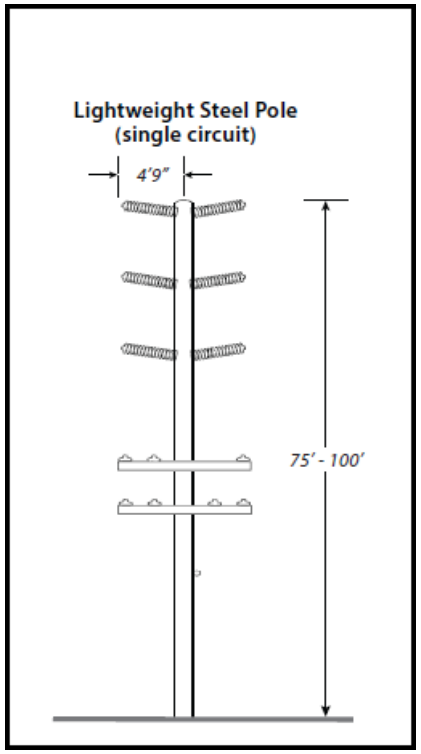
Project	Section	Page	DEIR Language	SCE Recommended Language
				• Meet project need while minimizing environmental impacts; and • Meet project need in a cost-effective manner."
Alberhill	1.2.2	1-10	Line 5 under heading Objectives of the Proposed Alberhill Project states: "Maintain system ties between a new 115-kV System and the Valley South 115-kV System that enable either of these systems to provide electricity in place of the other during maintenance, during emergency events, or to relieve other operational issues on one of these systems."	SCE suggests the following edits: "Maintain system ties between a new 115-kV System and the Valley South 115-kV System that enable the Valley South 115-kV System ~~either of these systems~~ to provide electricity to the Alberhill115-kV System ~~in place of the other~~ during maintenance, during emergency events, or to relieve other operational issues on one of these systems."
Alberhill	1.2.1.1	1-10	Line 11 states: "1.2.1.1 Applicant's Stated Objectives of the Proposed Alberhill Project"	Section numbering is incorrect. SCE suggests the following edits: "1.2.2~~1~~.1 Applicant's Stated Objectives of the Proposed Alberhill Project"
Alberhill/ Valley-Ivyglen	1.3.3	1-12	Line 14 under heading Other Public Agencies states: "The applicant would be required to obtain from local jurisdictions all building, encroachment, and other ministerial (administrative) permits that do not conflict with or interfere with the Commission's regulation of public utilities."	Because CEQA does not apply to "ministerial" projects (see Cal. Public Res. Code § 21080(b)(1), Title 14, Cal. Code of Regulations ("CEQA Guidelines") §§ 15268, 15300.1), SCE suggests the following edits to more closely align the assertions in the EIR with the statutory text of the CEQA: "The applicant would be required to obtain from local jurisdictions all ~~building, encroachment, and other~~ ministerial (administrative) permits that do not conflict with or interfere with the Commission's regulation of public utilities."
Alberhill/ Valley-Ivyglen	1.3.3	1-12	Line 18 under heading Other Public Agencies states: "CPUC General Order 131-D, requires the applicant to comply with local building, design, and safety standards to the greatest degree feasible to minimize the proposed projects' conflicts with local conditions."	CPUC General Order (G.O.) 131-D asserts 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" (see G.O. 131-D § XIV.B). SCE

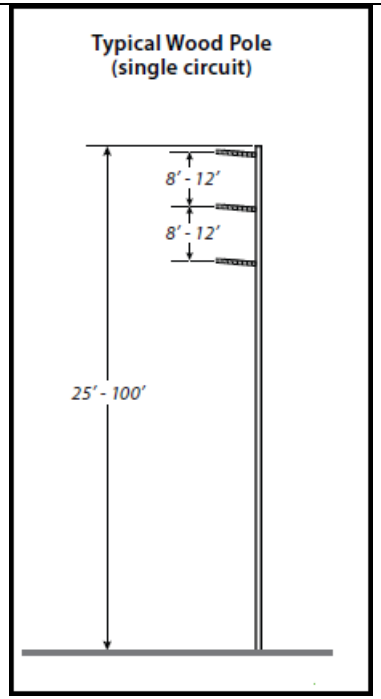
Project	Section	Page	DEIR Language	SCE Recommended Language
				seeks all applicable ministerial permits not infringing on the CPUC's jurisdiction, but any discretionary authority regarding SCE's proposed projects is retained by the CPUC (see Cal. Public Res. Code § 21080(b)(1); CEQA Guidelines §§ 15268, 15300.1). SCE suggests the following edits to align the assertions in the EIR with the statutory text of G.O. 131-D: "CPUC General Order 131-D, requires the applicant consult with local agencies regarding land use matters when locating electric power line projects.~~to comply with local building, design, and safety standards to the greatest degree feasible to minimize the proposed projects' conflicts with local conditions~~."
Valley-Ivyglen	2.1.1	2-1	Line 24 under heading Valley-Ivyglen Project Overview states: "...underground in new approximately (10,000 feet) and existing approximately (13,200 feet) conduit."	SCE suggests the following edits: "...underground in new (approximately ~~(~~10,000 feet) and existing (approximately ~~(~~13,200 feet) conduit."
Valley-Ivyglen	2.1.1	2-1	Line 31 under heading Valley-Ivyglen Project Overview states: "The applicant estimates that construction of the proposed Valley–Ivyglen Project would take approximately 27 months. It is anticipated that the proposed Valley–Ivyglen Project would be operational by the summer or fall 2018."	Per SCE project description edits submitted in September 2015, SCE suggests the following edits: "The applicant estimates that construction of the proposed Valley–Ivyglen Project would take approximately ~~27~~28 months. It is anticipated that the proposed Valley–Ivyglen Project would be operational by Q4 2019~~ the summer or fall 2018~~.
Alberhill/ Valley-Ivyglen	2.1.1	2-2	Figure 2-1	Placing the red dashed line adjacent to the blue line gives the impression that there are two new 115-kV subtransmission pole lines when in fact there is one existing pole line (not shown) and one double-circuit proposed pole line (red dash and blue line). SCE suggests the following edits: Please move the blue line (for Valley-Ivyglen) north of the green line (existing Serrano-Valley 500 kV) between Valley Substation and Highway 74. Also, please move the dash red line (Alberhill

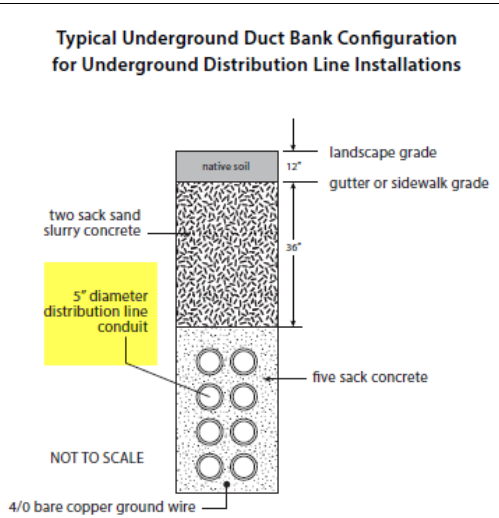
Project	Section	Page	DEIR Language	SCE Recommended Language
				115 kV) on top of the blue line (Valley-Ivyglen) from Third and Collier up to Alberhill Substation.
Alberhill	2.1.1	2-11	Figure 2.2i	Project Map does not differentiate between SCE's proposed and existing access roads. Please differentiate between proposed and existing access roads.
Alberhill	2.1.2	2-12	Line 12-14 – Under heading Alberhill Project Overview states: "Construction of approximately 11.75 miles of new double-circuit 115kV subtransmission lines and removal of 11 miles of existing single-circuit 115-kV subtransmission lines primarily in the existing ROW;"	SCE recommends following edits: "Double-circuit ~~Construction of~~ approximately 11.75 miles of existing single-circuit ~~new double-circuit~~ 115-kV subtransmission lines with structure replacement ~~and removal of 11 miles of existing single-circuit 115-kV subtransmission lines~~ primarily in the existing ROW;"
Alberhill	2.1.2	2-12	Line 32 under heading Alberhill Project Overview states: "It is anticipated that the proposed Alberhill Project would be operation by spring or summer 2019."	SCE suggest the following edits: "It is anticipated that the proposed Alberhill Project would be operation by ~~spring or summer 2019~~ Q4 2020."
Alberhill	2.2	2-13	Figure 2-3	See Attachment C for revision of Figure 2-3 with annotated changes.
Valley-Ivyglen	2.3.1	2-15	Table 2-1 – Under column Component, section Subtransmission Line Segments (Overhead and Underground) states: "Segment VIG3: New single-circuit 115kV subtransmission line along"	SCE suggests the following edits: Segment VIG3: New single-circuit 115kV subtransmission line ~~along~~

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	2.3.1	2-18	Figure 2-4 states: "Lightweight Steel Pole (single circuit)" 	SCE suggests the following edits: "Lightweight Steel Pole (~~single~~ double circuit)"
Alberhill/ Valley-Ivyglen	2.3.1	2-18	Figure 2-4 states: "Typical wood pole (single circuit) 25' - 100' "	SCE suggests the following edits: "Typical wood pole (single circuit) ~~25~~75' – 100' Please add the following dimensions to the Span Guy in Figure 2-4:

Project	Section	Page	DEIR Language	SCE Recommended Language
				Guy stub poles are typically 35' – 50'
Alberhill/ Valley-Ivyglen	2.3.1.1	2-18	Figure 2-4, Subtransmission Structures and Underground Conduit - Distribution Underground Duct Bank Configuration figure states: "Typical Underground Duct Bank Configuration for Underground Distribution Line Installations" 5" diameter distribution line conduit	Please relabel figure to read: "Typical ~~Underground~~ Duct Bank Configuration for Underground ~~Distribution~~ Sub-transmission Line Installations" 5" diameter ~~distribution line~~ conduit

Project	Section	Page	DEIR Language	SCE Recommended Language
				
Valley-Ivyglen	2.3.1.1	2-20	Line 25-28, under heading 115-kV Segment VIG5 states: "West of Lake Street Option: Under this option, 115-kV Segment VIG5 would cross Lake Street at its intersection with the abandoned portion of Old Lake Street. The segment would then continue parallel to and west of Lake Street. The segment would continue north on Lake Street to the I-15 on- and off-ramps for Lake Street."	SCE suggests the following edits: "West of Lake Street Option: Under this option, 115-kV Segment VIG5 would cross Lake Street at its intersection with the abandoned portion of Old Lake Street. The segment would then continue parallel to and west of Lake Street. The segment would continue north on Lake Street to approximately 800 feet south of Temescal Canyon Road then cross to the east side of Lake Street and continue north to the I-15 on- and off-ramps for Lake Street."
Valley-Ivyglen	2.3.1.1	2-24	Figure 2.5b The figure identifies a portion of VIG4, along Pasadena and Third Street as underground.	Please revise the figure to identify this portion of VIG4 as overhead to be consistent with the description.
Alberhill	2.3.2	2-27	Table 2-2 under column Quantity, section Alberhill Substation 500-KV switchrack states:	SCE suggests the following edits for the 500-kV switchrack row "Space for two ~~three~~ future ~~115~~ 500-kV capacitor banks"

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td></td><td></td><td></td><td>“Space for three future 115-kV capacitor banks”</td><td></td></tr>
<tr><td>Alberhill</td><td>2.3.2</td><td>2-28</td><td>Table 2-2 under column Component, Section Subtransmission Line Segments (Overhead) states:

“Segment ASP3: New double-circuit 115-kV line segment and removal of existing single-circuit section of Valley–Elsinore–Fogarty–Ivyglen 115-kV line”</td><td>Per SCE’s Project Description edits in September 2015, SCE suggests the following edits:

“Segment ASP3: New double-circuit 115-kV line segment and removal of existing single-circuit section of Valley–Elsinore–Fogarty~~–Ivyglen~~ 115-kV line”</td></tr>
<tr><td>Alberhill</td><td>2.3.2</td><td>2-28</td><td>Table 2-2 under column Dimensions/ Specifications, section Segment ASP2 states:

• 6.27 miles
• 60-foot to 100-foot-wide ROW (existing)</td><td>SCE suggests the following edits:

• 6.27 miles
• 60-foot to 100-foot-wide ROW (existing) <u>Existing distribution line underbuild to be relocated to new 115-kV structures</u></td></tr>
<tr><td>Alberhill</td><td>Table 2-2</td><td>2-29</td><td>Table 2-2 Components of the Proposed Alberhill Project

New overhead ground wires installed on 500-kV Lines SA and VA (i)

<table>
<tr><td colspan="3">Transmission Lines (Overhead)</td></tr>
<tr><td>Line SA: New 500-kV transmission line to connect the proposed Alberhill Substation to existing Serrano-Valley 500-kV Transmission Line</td><td>• 6 LSTs (1 LST removed) (d)</td><td>• 1.6 miles long
• 250-foot to 2,100-foot spans between LSTs
• 200-foot-wide ROW (new) (e)</td></tr>
<tr><td>Line VA: New 500-kV transmission line to connect the proposed Alberhill Substation to existing Serrano-Valley 500-kV Transmission Line (overhead)</td><td>• 6 LSTs

No structures removed</td><td>• 1.7 miles long
• 250-foot to 2,100-foot spans between LSTs
• 200-foot-wide</td></tr>
</table></td><td>Overhead ground wire is considered a transmission element, SCE suggests the following edits:

<table>
<tr><td colspan="3">Transmission Lines (Overhead)</td></tr>
<tr><td>Line SA: New 500-kV transmission line to connect the proposed Alberhill Substation to existing Serrano-Valley 500-kV Transmission Line</td><td>• 6 LSTs (1 LST removed) (d)</td><td>• 1.6 miles long
• 250-foot to 2,100-foot spans between LSTs
• 200-foot-wide ROW (new) (e)</td></tr>
<tr><td>Line VA: New 500-kV transmission line to connect the proposed Alberhill Substation to existing Serrano-Valley 500-kV Transmission Line</td><td>• 6 LSTs
No structures removed</td><td>• 1.7 miles long
• 250-foot to 2,100-foot spans between LSTs
• 200-foot-wide</td></tr>
</table></td></tr>
</table>

Project	Section	Page	DEIR Language	SCE Recommended Language

DEIR Language

		ROW (new) (e)

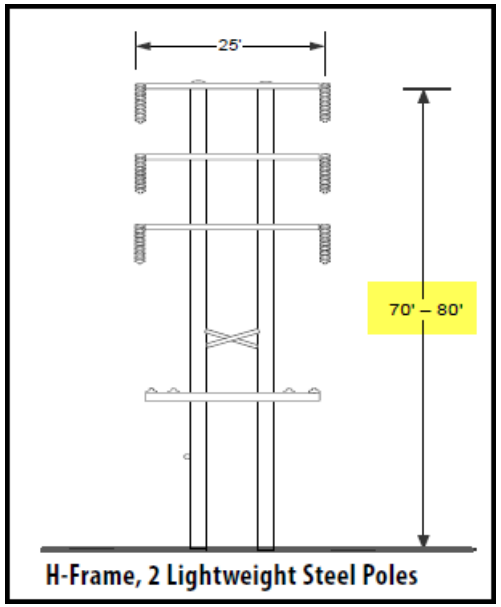
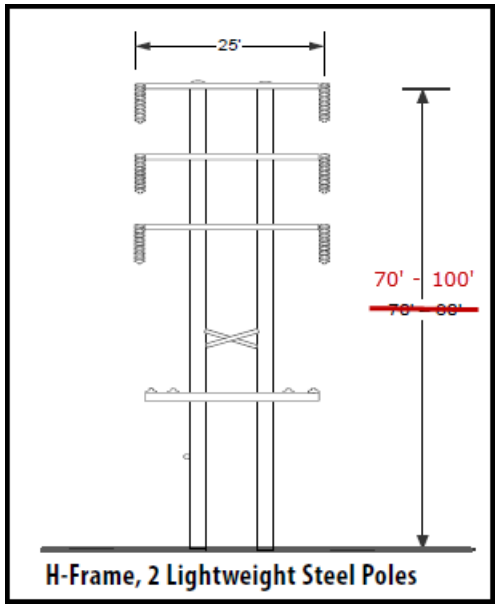
Telecommunications Equipment and Fiber Optic Lines (Overhead and Underground)		
New microwave tower at Alberhill Substation	• 1 antenna tower	• 120 feet tall
New dishes at the proposed Alberhill Substation (one), Serrano Substation (one), and the Santiago Peak Communications Site (two)	• 4 microwave dish antennas	• 10 feet wide (each)
New overhead ground wires installed on 500-kV Lines SA and VA (i)	n/a	• 3.3 miles
New fiber optic telecommunication line installed on two 115-kV line taps into the proposed Alberhill Substation	n/a	• 2,000 feet • 650 feet underground
New fiber optic telecommunication line installed on 115-kV Segments ASP1, ASP 1.5, ASP5, ASP6, and ASP7	n/a	• 8.66 miles • 1.11 miles underground

SCE Recommended Language

(overhead)		ROW (new) (e)
<u>New overhead ground wires installed on 500-kV Lines SA and VA (i)</u>	<u>n/a</u>	• <u>3.3 miles</u>

Telecommunications Equipment and Fiber Optic Lines (Overhead and Underground)		
New microwave tower at Alberhill Substation	• 1 antenna tower	• 120 feet tall
New dishes at the proposed Alberhill Substation (one), Serrano Substation (one), and the Santiago Peak Communications Site (two)	• 4 microwave dish antennas	• 10 feet wide (each)
~~New overhead ground wires installed on 500-kV Lines SA and VA (i)~~	~~n/a~~	~~• 3.3 miles~~
New fiber optic telecommunication line installed on two 115-kV line taps into the proposed Alberhill Substation	n/a	• 2,000 feet • 650 feet underground

Project	Section	Page	DEIR Language	SCE Recommended Language
			<table><tr><td>New telecommunications equipment installed inside existing substations (e.g., microwave radios)</td><td>n/a</td><td>n/a</td></tr></table>	<table><tr><td>New fiber optic telecommunication line installed on 115-kV Segments ASP1, ASP 1.5, ASP5, ASP6, and ASP7</td><td>n/a</td><td>• 8.66 miles • 1.11 miles underground</td></tr><tr><td>New telecommunications equipment installed inside existing substations (e.g., microwave radios)</td><td>n/a</td><td>n/a</td></tr></table>
Alberhill	2.3.2	2-29	Table 2-2 : The number of wood pole removals for ASP8 are not provided in the Quantity column	Please add "(3 wood poles removed)" to the Quantity column of Segment ASP8.
Alberhill	2.3.2.1	2-39	Line 15 under heading Entrance, Love Lane, Gates, Driveways, Parking and Perimeter Wall states: "The wall would be constructed to safety standards and may need to comply with the current version of NERC/CIP requirements for major electrical facilities. It would be designed to be consistent with the surrounding community's construction standards. A band of at least three strands of barbed wire would be affixed near the top of the perimeter wall inside the proposed Alberhill Substation. The barbed wire would not be visible from outside the substation. Landscaping and irrigation would be installed after the proposed Alberhill Substation wall is constructed."	Per Data Request response G4, SCE suggests the following edits: "The wall would be constructed to safety standards and may need to comply with the current version of NERC/CIP requirements for major electrical facilities. It would be designed to be consistent with the surrounding community's construction standards. A band of at least three strands of barbed wire and/or a top guard (e.g., barbed wire or spiked strips) would be affixed to ~~near the top of~~ the perimeter wall of ~~inside~~ the proposed Alberhill Substation. ~~The barbed wire would not be visible from outside the substation.~~ Landscaping and irrigation would be installed after the proposed Alberhill Substation wall is constructed."
Alberhill	2.3.2.2	2-40	Line 37 under heading 500-kV Transmission Lines states: "The normal rating (in clear atmospheric conditions, with an ambient temperature of 104 degrees Fahrenheit, at an elevation of 500 feet, and with a wind speed of 4 feet per second) of the existing and proposed 2,156-kcmil (ACSR) is 3,950 amps when in continuous operation."	SCE suggest the following edits: "The normal rating (in clear atmospheric conditions, with an ambient temperature of 104 degrees Fahrenheit, at an elevation of 500 feet, and with a wind speed of 4 feet per second) of the

Project	Section	Page	DEIR Language	SCE Recommended Language
				existing and proposed 2,156-kcmil ~~(~~ACSR~~)~~ is 3,950 amps when in continuous operation."
Alberhill	2.3.2.2	2-41	Figure 2-8 indicates: H-Frame, 2 Lightweight Steel Poles height range of 70' – 80' 	All proposed H-frames for Alberhill Segment 5 are 70' – 100'. SCE suggests the following edits: 
Alberhill	2.3.2.3	2-42	Line 29 under heading 115-kV Subtransmission Lines (Segments ASP1 through ASP8) states: "For the purposes of this document, it is assumed that the 115-kV structures to be removed could be located at any point along 115-kV Segments ASP1.5 through ASP8 and that new 115-kV structures could be installed anywhere along 115-kV Segments ASP1, ASP1.5, and ASP3 through ASP8."	SCE suggests to the following edits: "For the purposes of this document, it is assumed that the existing 115-kV structures to be ~~removed~~ replaced could be located at any point along 115-kV Segments ASP1.5 through ASP8 and that new 115-kV structures could be installed anywhere along 115-kV Segments ASP1, ASP1.5, and ASP3 through ASP8."
Alberhill	2.3.2.3	2-43	Line 30 under heading 115-kV Segment ASP2 states:	Consistent with Table 2-2, SCE suggests the following edits:

Project	Section	Page	DEIR Language	SCE Recommended Language
			"As part of the proposed Alberhill Project, three replacement LWS poles and one TSP would be installed on the north side of Concordia Ranch Road (Table 2-2). The final location of the four poles on the north side of Concordia Ranch Road would accommodate 115-kV circuits that would exit Alberhill Substation to the east on poles constructed as part of the Valley–Ivyglen Project."	"As part of the proposed Alberhill Project, three replacement LWS poles and ~~one~~ two TSPs would be installed on the north side of Concordia Ranch Road (Table 2-2). The final location of the ~~four~~ five poles on the north side of Concordia Ranch Road would accommodate 115-kV circuits that would exit Alberhill Substation to the east on poles constructed as part of the Valley–Ivyglen Project."
Alberhill	2.3.2.4	2-47	Line 20 Under the heading "Fiber Optic Lines and Telecommunications Equipment" states: "New telecommunications equipment would be installed within the telecommunications rooms at the Serrano, Barre, Walnut, Mira Loma, Serrano, Ivyglen, Fogarty, Skylark, Tenaja, Newcomb, and Valley substations to facilitate the new telecommunications connections."	The Serrano substation is repeated twice. SCE suggests the following edits: "New telecommunications equipment would be installed within the telecommunications rooms at the Serrano, Barre, Walnut, Mira Loma, ~~Serrano,~~ Ivyglen, Fogarty, Skylark, Tenaja, Newcomb, and Valley substations to facilitate the new telecommunications connections."
Alberhill	2.3.2.5	2-47	Line 29 under the heading Access Roads states: "Each of the proposed 500-kV transmission line tower sites would require 24-hour vehicular access during operation of the proposed Alberhill Project for emergency and maintenance activities."	SCE suggests the following edits: "Each of the proposed 500-kV transmission line tower sites ~~would~~ could require 24-hour vehicular access during operation of the proposed Alberhill Project for emergency and maintenance activities."
Alberhill	2.3.2.5	2-47	Line 31 under heading Access Roads states: "The applicant would construct approximately 6.1 miles of new or modified access roads to access the proposed 500-kV transmission line structures (Table 2-6; Figure 2-2i) if the conventional method of construction is used for the 500-kV transmission line (refer to Section 2.4.5.5)."	Additional designs have been completed, the access roads for the 500-kV transmission line structures have been reduced for the Alberhill Project. SCE suggests the following edits. "The applicant would construct approximately 3 ~~6.1~~ miles of new or modified access roads to access the proposed 500-kV transmission line structures (Table 2-6; Figure 2-2i) if the conventional method of construction is used for the 500-kV transmission line (refer to Section 2.4.5.5)."
Alberhill	2.3.2.5	2-47	Line 36 under heading Access Road states:	New or modified access roads are not required for the proposed Alberhill 115-kV segments. SCE suggests the following edits:

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td></td><td></td><td></td><td>“The proposed Alberhill 115-kV segments would not require new or modified access roads, except for a short access road segment for 115-kV Segment ASP5.”</td><td>“The proposed Alberhill 115-kV segments would not require new or modified access roads~~, except for a short access road segment for 115-kV Segment ASP5~~.”</td></tr>
<tr><td>Alberhill</td><td>2.4.1</td><td>2-48</td><td>Table 2-3 (Estimated Construction Schedule) –The last row: Estimated Operational Date (ASP) states:

Table 2-3 Estimated Construction Schedule<table><tr><th>Project Components</th><th>Estimated Start</th><th>Duration</th></tr><tr><td>ASP: 115-kV Lines (ASP1 to ASP8)</td><td>Spring 2017</td><td>28 months</td></tr><tr><td>ASP: Telecommunications</td><td>Winter 2017</td><td>12 months [a]</td></tr><tr><td>VIG: 115-kV Lines (VIG1 to VIG8)</td><td>Fall 2016</td><td>27 months</td></tr><tr><td>VIG: Telecommunications</td><td>Summer 2017</td><td>7 months</td></tr><tr><td>ASP: Proposed Alberhill Substation</td><td>Summer 2016</td><td>21 months</td></tr><tr><td>ASP: 500-kV Lines</td><td>Summer 2017</td><td>17 months</td></tr><tr><td>ASP and VIG: Testing</td><td>Timing to be determined during final engineering</td><td>3 months</td></tr><tr><td>Estimated Operational Date (VIG)</td><td colspan="2">Fall/Winter 2018 (27 months to construct)</td></tr><tr><td>Estimated Operational Date (ASP)</td><td colspan="2">Summer 2019 (28 months to construct)</td></tr></table></td><td>Per SCE project description edits submitted in September 2015, SCE suggests the following edits:

Table 2-3 Estimated Construction Schedule<table><tr><th>Project Components</th><th>Estimated Start</th><th>Duration</th></tr><tr><td>ASP: 115-kV Lines (ASP1 to ASP8)</td><td>~~Spring 2017~~ Q1 2018</td><td>28 months</td></tr><tr><td>ASP: Telecommunication</td><td>~~Winter 2017~~ Q3 2018</td><td>12 months</td></tr><tr><td>VIG: 115-kV Lines (VIG1 to VIG8)</td><td>~~Fall 2016~~ Q1 2017</td><td>~~27~~8 months</td></tr><tr><td>VIG: Telecommunications</td><td>~~Summer 2017~~ Q4 2017</td><td>7 months</td></tr><tr><td>ASP: Proposed Alberhill Substation</td><td>~~Summer 2016~~ Q1 2018</td><td>21 months</td></tr><tr><td>ASP: 500-kV Lines</td><td>~~Summer 2017~~ Q1 2019</td><td>7 months</td></tr><tr><td>ASP and VIG: Testing</td><td>Timing to be determined during final engineering</td><td>3 months</td></tr><tr><td>Estimated Operational Date (VIG)</td><td colspan="2">~~Fall/Winter 2018~~ Q4 2019 (~~27~~8 months to construct)</td></tr><tr><td>Estimated Operational Date (ASP)</td><td colspan="2">~~Summer 2019~~ Q4 2020 (28 months to construct)</td></tr></table></td></tr>
<tr><td>Valley-Ivyglen</td><td>2.4.1</td><td>2-48</td><td>Table 2-3 Footnote A under heading Schedule, Equipment and Personnel states:

“The applicant does not anticipate that the proposed telecommunications installations would require more than 12 months to complete, but the telecommunications installations may occur at any time throughout the 12-month period beginning in Winter 2017.”</td><td>Per SCE project description edits submitted in September 2015, SCE suggests the following edits:

“The applicant does not anticipate that the proposed telecommunications installations would require more than 12 months to complete, but the telecommunications installations may occur at any time throughout the 12-month period beginning in Q3 2018 ~~Winter 2017~~.”</td></tr>
<tr><td>Alberhill/ Valley-Ivyglen</td><td>2.4.1</td><td>2-49</td><td>Line 2 under heading Construction, Schedule and Personnel states:

“Construction activities would be scheduled during daylight hours, Monday through Saturday.”</td><td>SCE suggests the following edits:

“Construction activities would be scheduled during hours within the local noise ordinance ~~daylight hours~~, Monday through Saturday.”</td></tr>
</table>

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td>Alberhill</td><td>2.4.2.2</td><td>2-52</td><td>Table 2-6 Land Disturbance Estimates: Alberhill Substation and 115-kV Segments ASP1 through ASP 8 states:

Component: Access Road on 115-kV Segment ASP5

<table>
<tr><td>Trenching for fiber optic line installation</td><td>5,808 x 1.5</td><td>0.2</td><td>0.2</td><td>0.0</td></tr>
<tr><td>Access Road on 115-kV Segment ASP5</td><td>325 x 26</td><td>0.2</td><td>0.0</td><td>0.2</td></tr>
<tr><td colspan="2">115-kV Segments ASP1.5 through ASP8 total</td><td>245.6 acres</td><td>222.2 acres</td><td>23.4 acres</td></tr>
<tr><td colspan="2">Total (115-kV Subtransmission Lines and Substation)</td><td>288.5 acres</td><td>222.2 acres</td><td>66.3 acres</td></tr>
</table>
</td><td>SCE does not propose an access road along Segment ASP5. Please remove references to access road on 115-kV ASP5 as follows:

<table>
<tr><td>Trenching for fiber optic line</td><td>5,808 x 1.5</td><td>0.2</td><td>0.2</td><td>0.0</td></tr>
<tr><td>~~Access Road on 115-kV Segment ASP5~~</td><td>~~325 x 26~~</td><td>~~0.2~~</td><td>~~0.0~~</td><td>~~0.2~~</td></tr>
<tr><td colspan="2">115-kV ASP1.5 through ASP8 total</td><td>~~245.6~~ 245.4</td><td>222.2</td><td>~~23.4~~ 23.2</td></tr>
<tr><td colspan="2">Total (115-kV Subtransmission Lines and Substation)</td><td>~~288.5~~ 288.3</td><td>222.2</td><td>~~66.3~~ 66.1</td></tr>
</table>
</td></tr>
<tr><td>Alberhill</td><td>2.4.2.2</td><td>2-54</td><td>Table 2-7 Conventional Method Land Disturbance Estimates: 500-kV Transmission Lines states:

<table>
<tr><td>New access roads (6.1 miles)</td><td>6.1 miles x 25 feet [e]</td><td>60.6</td><td>41.4</td><td>19.2</td></tr>
</table>
</td><td>Per SCE’s edits to Section 2.3.2.5, SCE suggests the following edits:
<table>
<tr><td>New or modified access roads (3 ~~6.1~~ miles)</td><td>~~6.1~~ 3 miles x 25 feet[e]</td><td>60.6</td><td>~~41.4~~ 51.1</td><td>~~19.2~~ 9.5</td></tr>
</table>
</td></tr>
<tr><td>Alberhill/ Valley-Ivyglen</td><td>2.4.2.3</td><td>2-55</td><td>Line 4 under heading 115-kV General Disturbance Areas states:

“Final engineering for the proposed projects has not been completed. For this reason, the applicant provided large, general disturbance areas for the proposed projects to ensure that the required flexibility would be available during construction and for final siting of the proposed 115-kV facilities. The Alberhill 115-kV General Disturbance Area is approximately 505 acres, and the Valley–Ivyglen 115-kV 7 General Disturbance Area is approximately 1,335 acres (Figures 2-6a to 2-6d). A general</td><td>SCE suggests the following edit because a general disturbance area was not deemed necessary in support of the construction of Alberhill Substation and 500-kV transmission lines:

“Final engineering for the proposed projects has not been completed. For this reason, the applicant provided large, general disturbance areas for the proposed projects to ensure that the required flexibility would be available during construction and for final siting of the proposed 115-kV facilities. The Alberhill 115-kV General Disturbance Area is approximately 505 acres,</td></tr>
</table>

Project	Section	Page	DEIR Language	SCE Recommended Language
			disturbance area was not identified for the other components of the proposed Alberhill Project (i.e., the proposed Alberhill Substation and 500-kV transmission lines) because more detailed final engineering was not provided by the applicant prior to completion of this document."	and the Valley–Ivyglen 115-kV 7 General Disturbance Area is approximately 1,335 acres (Figures 2-6a to 2-6d). A general disturbance area was not identified for the other components of the proposed Alberhill Project (i.e., the proposed Alberhill Substation and 500-kV transmission lines) because more detailed final engineering was ~~not~~ provided by the applicant prior to completion of this document."
Alberhill/ Valley-Ivyglen	2.4.2.3	2-55	Line 15 under the heading 115-kV General Disturbance Areas, the second paragraph states: "Disturbance areas for the proposed projects would typically vary between 50 feet wide and 150 feet wide along the proposed 115-kV routes (50 feet to 75 feet on each side of centerline) depending on the type of structure to be installed or construction activity to be completed (Tables 2-5 and 2-7)."	Please correct reference to "Tables 2-5 and 2-7" as follows: "Disturbance areas for the proposed projects would typically vary between 50 feet wide and 150 feet wide along the proposed 115-kV routes (50 feet to 75 feet on each side of centerline) depending on the type of structure to be installed or construction activity to be completed (Tables 2-5 and ~~2-7~~ 2-6)."
Alberhill	2.4.4.2	2-58	Line 23 under heading Concrete Use states: "Each 500kV tower would be constructed on four drill concrete foundations. Steel-reinforced cages and stub angles would be installed into the auger holes and then concrete would be poured. A similar method would be used for 115-kV TSP construction, but less concrete is required for a TSP foundation."	SCE suggests the following edits: "Each 500kV tower would be constructed on four drill concrete foundations. Steel-reinforced cages and stub angles would be installed into the auger holes and then concrete would be poured. A similar method would be used for 115-kV TSP construction using single drill concrete foundation, but less concrete is typically required for a TSP foundation."
Alberhill/ Valley-Ivyglen	2.4.4.4	2-59	Line 18 under Traffic Control and Lane Closure states: "Very short closures of roads may occasionally be required for equipment and personnel repositioning for safety."	SCE suggests the following edits: ~~Very short closures of roads may occasionally be required for equipment and personnel repositioning for safety~~. Lane closures would be temporary and short term, and likely limited to a day at a time during stringing activities. In addition, the applicant may use flaggers to control traffic during conductor and telecommunications wire installation activities in locations where guard structures are not used. These delays would last approximately 15 minutes per conductor for a total of up to one hour in some locations.

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

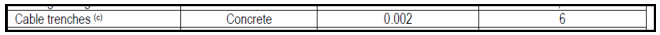
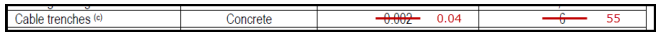
DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	2.4.4.7	2-62	Line 8 under heading Hazardous Materials Use and Hazardous Waste Disposal states: "Wood poles that are removed may be reused by the applicant, returned to the manufacturer, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a municipal landfill certified by the associated Regional Water Quality Control Board depending on their condition and original chemical treatment"	SCE suggests the following edits: "Wood poles that are removed may be reused by the applicant, ~~returned to the manufacturer,~~ disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a municipal landfill certified by the associated Regional Water Quality Control Board depending on their condition and original chemical treatment"
Valley-Ivyglen	2.4.5.1	2-63	Line 42 under heading Access Road Construction, Valley-Ivyglen Project states: "The applicant estimates that the total combined length of retaining walls may be approximately 2,200 feet with an average height of 8 feet."	Additional designs have been completed and retaining walls are no longer needed for the Valley-Ivyglen Project. SCE suggests the following edits. ~~The applicant estimates that the total combined length of retaining walls may be approximately 2,200 feet with an average height of 8 feet.~~
Alberhill	2.4.5.1	2-64	Line 14-15 under the heading Alberhill Project state: "Under the conventional method of construction for the 500-kV transmission line, about 6.1 miles of access road would be constructed."	Additional designs have been completed and the access roads for the 500-kV transmission line structures have been reduced for the Alberhill Project. SCE suggests the following edits. Under the conventional method of construction for the 500-kV transmission line, about 3 ~~6.1~~ miles of access road would be constructed (includes new and modified).
Alberhill	2.4.5.1	2-64	Line 16-17, Under the Alberhill Project states: "About 325 feet of access road would be constructed for 115-kV Segment ASP5."	SCE does not propose an access road along Segment ASP5. Please remove references to access road on 115-kV ASP5 as follows: 'Under the Alberhill Project, the third sentence states: ~~"About 325 feet of access road would be constructed for 115-kV Segment ASP5."~~
Valley-Ivyglen	2.4.5.2	2-64	Line 40 under heading Helicopter and Airstrip Use states: "Light-duty helicopters may be used along 115-kV Segments VIG1 and VIG4 to VIG7 for materials delivery, hardware	After further review, SCE suggests the following edits. "Light-duty helicopters may be used along 115-kV Segments VIG1 and ~~VIG4 to VIG7~~ VIG6 for materials delivery, hardware

Project	Section	Page	DEIR Language	SCE Recommended Language
			installation, and wire stringing. In general, helicopter operations (including takeoff and landing) would be limited to areas in proximity to wire stringing sites or access roads and previously disturbed areas near construction sites within the 115-kV Valley–Ivyglen General Disturbance Area (Section 2.4.2.1) or the fueling, takeoff, and landing areas described below."	installation, and wire stringing. In general, helicopter operations (including takeoff and landing) would be limited to areas in proximity to wire stringing sites or access roads and previously disturbed areas near construction sites within the 115-kV Valley–Ivyglen General Disturbance Area (Section 2.4.2.1) or the fueling, takeoff, and landing areas described below."
Alberhill/ Valley-Ivyglen	2.4.5.2	2-67	Line 5 under heading Helicopter Specifications and Best Management Practices states: "The applicant would employ BMPs to minimize impacts caused by the use of helicopters. BMPs would include: • Using helicopters with low-emitting engines to the extent practical • Efficiently maximizing flight times • Designating flight paths away from residential areas • Identifying sensitive receptors that might be disturbed by construction noise • Providing advance notice of helicopter work • Obtaining variances from local noise ordinances as required The applicant would not use helicopters for construction at night. Helicopters would only be used during daylight hours consistent with applicable laws and regulations."	CPUC General Order (G.O.) 131-D asserts 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" (see G.O. 131-D § XIV.B). SCE seeks all applicable ministerial permits not infringing on the CPUC's jurisdiction, but any discretionary authority regarding SCE's proposed projects is retained by the CPUC (see G.O. 131-D § XIV.B; Cal. Public Res. Code § 21080(b)(1); CEQA Guidelines §§ 15268, 15300.1). Because variances are discretionary (not ministerial) actions, the CPUC retains authority over their issuance. SCE suggests the following edits to clarify the scope of the BMPs and align the assertions in the DEIR with G.O. 131-D: Consistent with Project Commitment H, the ~~The~~ applicant would employ BMPs to minimize noise impacts caused by the use of helicopters. BMPs would include: • ~~Using helicopters with low-emitting engines to the extent practical~~ • Maximize the efficient use of ~~Efficiently maximizing~~ flight times • Designating flight paths away from residential areas • Identifying sensitive receptors that might be disturbed by construction noise • Providing advance notice of helicopter work

Project	Section	Page	DEIR Language	SCE Recommended Language
				• ~~Obtaining variances from local noise ordinances as required~~ The applicant would not use helicopters for construction at night. Helicopters would only be used during daylight hours consistent with applicable laws and regulations.
Alberhill	2.4.5.5	2-75	Line 32 under heading Grounding states: "To ensure worker safety during construction within the applicant's Serrano–Valley 500-kV Transmission Line ROW, the applicant would ground the Serrano–Valley 500-kV Transmission Line at four existing 500-kV tower sites: M14-T2, M14-T1, M13-T3, and M13-T2. No equipment other than pickup trucks, capstan hoists, clamps, and grounding cables would be required for grounding the two towers located within the Core Reserve (M14-T2 and M14-T1). At the other tower sites, additional equipment (e.g., bucket trucks for lifting workers) may be used. No grounding cables or rods would be installed into the ground. No ground disturbance would be required for grounding at any of the existing or proposed 500-39 kV tower sites. To access the tower sites located within the Core Reserve, the applicant estimates that construction crews would drive to towers M14-T2 and M14-T1 (about 2.5 miles roundtrip) using pickup trucks on existing access and maintenance roads. Access to towers M13-T3 and M13-T2 would also require the applicant to drive on an existing access road that briefly passes through the Core Reserve boundary. Access to these tower sites would occur twice per day during 500-kV Tower SA6 and VA6 foundation installation and for wire snubbing: once to install grounds and once to remove them. The existing access and maintenance roads that would be used are shown on Figure 2-2i."	SCE has reviewed the grounding locations for the 500-kV lines. As a result grounding is no longer needed at all four existing towers. SCE suggests the following edits: "To ensure worker safety during construction within the applicant's Serrano–Valley 500-kV Transmission Line ROW, the applicant would ground the Serrano–Valley 500-kV Transmission Line at <u>two</u> ~~four~~ existing 500-kV tower sites: ~~M14-T2,~~ M14-T1~~,~~ <u>and</u> M13-T3~~, and M13-T2~~. No equipment other than pickup trucks, capstan hoists, clamps, and grounding cables would be required for grounding the two towers located within the Core Reserve (~~M14-T2 and~~ M14-T1). At the other tower sites, additional equipment (e.g., bucket trucks for lifting workers) may be used. No grounding cables or rods would be installed into the ground. No ground disturbance would be required for grounding at any of the existing or proposed 500-39 kV tower sites. To access the tower sites located within the Core Reserve, the applicant estimates that construction crews would drive to towers ~~M14-T2 and~~ M14-T1 (about 2.5 miles roundtrip) using pickup trucks on existing access and maintenance roads. Access to tower~~s~~ M13-T3 ~~and M13-T2~~ would also require the applicant to drive on an existing access road that briefly passes through the Core Reserve boundary. Access to these tower sites would occur twice per day during 500-kV Tower SA6 and VA6 foundation installation and for wire snubbing: once to install grounds and once to remove them. The existing access and maintenance roads that would be used are shown on Figure 2-2i."
Alberhill	2.4.5.5	2-76	Line 5 under heading Grounding states:	SCE suggests the following edits:

Project	Section	Page	DEIR Language	SCE Recommended Language
			"The clamps would be connected by grounding cables to the 500-kV conductors."	"The clamps would be connected by grounding cables to both the 500-kV conductors and the overhead ground wire."
Alberhill	2.4.5.5	2-76	Line 15 under heading Conductor and Overhead Ground Wire Snubbing states: "Conductor snubbing would be required for each of the three 500-kV transmission line conductor phases, which would be separated from existing 500-kV lattice steel tower M13-T4 and extended to the two proposed towers (500-kV Towers SA6 and VA6) within the existing 500-kV ROW. The term conductor snubbing refers to removing conductors from the insulators and securing them to utility structures (Figure 2-10). In this case, insulators are located between each of the conductors and the bridges of the 500-kV lattice steel towers. Snubbing ensures that the conductors are secured such that when they are separated (cut) they do not fall to the ground. Snubbing would also be required for the overhead ground wire. Conductor snubbing would occur at 500-kV towers M14-T2, M14-T1 and M13-T3, and M13-T2 and the proposed 500-kV towers VA6 and SA6. Between one and two conductor phases (two conductors each) would be snubbed to towers M14-T2, M14-T1 and M13-T3 or M13-T2. Multiple towers would be used for snubbing to ensure that the weight of the conductors does not damage any of the towers along the 500-kV transmission line. Conductor would also be snubbed as needed to the other proposed 500-kV towers (SA1 to SA5 and VA1 to VA5) during conductor and overhead ground wire installation from the proposed substation, upslope to the Serrano–Valley 500-kV Transmission Line. Rough-terrain cranes, a man lift (e.g., bucket or boom truck), and crew truck would be used for conductor snubbing at the 500-kV tower sites, including towers M14-T2 and M14-T1 within the Core Reserve. Grips would be installed on each conductor by workers raised by a man lift to the bridge level of the towers. The grips would be connected to a hoist device that attaches to the	SCE has reviewed snubbing locations at the 500-kV Transmission Lines. As a result, snubbing is no longer required at the existing towers and will only occur at the proposed towers (SA6 and VA6). The figure shows a tangent tower that would not be used for snubbing. Therefore SCE suggests the following edits: "Conductor snubbing would be required for each of the three 500-kV transmission line conductor phases, which would be separated from existing 500-kV lattice steel tower M13-T4 and extended to the two proposed towers (500-kV Towers SA6 and VA6) within the existing 500-kV ROW. The term conductor snubbing refers to removing conductors from the insulators and securing them to utility structures ~~(Figure 2-10)~~. In this case, insulators are located between each of the conductors and the bridges of the 500-kV lattice steel towers. Snubbing ensures that the conductors are secured such that when they are separated (cut) they do not fall to the ground. Snubbing would also be required for the overhead ground wire. Conductor snubbing would occur at ~~500-kV towers M14-T2, M14-T1 and M13-T3, and M13-T2 and~~ the proposed 500-kV towers VA6 and SA6~~. Between one and two conductor phases (two conductors each) would be snubbed to towers M14-T2, M14-T1 and M13-T3 or M13-T2. Multiple towers would be used for snubbing to ensure that the weight of the conductors does not damage any of the towers along the 500-kV transmission line. Conductor would also be snubbed as needed to the other proposed 500-kV towers (SA1 to SA5 and VA1 to VA5)~~ during conductor and overhead ground wire installation from the proposed substation, upslope to the Serrano–Valley 500-kV Transmission Line. ~~Rough-terrain cranes, a man lift (e.g., bucket or boom truck), and crew truck would be used for conductor snubbing at the 500-kV~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			tower. The conductors would be removed from the insulators and a crane would be used to raise the conductors to the tower bridge where they would be snubbed—affixed."	~~tower sites, including towers M14-T2 and M14-T1 within the Core Reserve.~~ Grips would be installed on each conductor by workers raised by a man lift to the bridge level of the towers. The grips would be connected to a hoist device that attaches to the tower. The conductors would be removed from the insulators and a crane would be used to raise the conductors to the tower bridge where they would be snubbed—affixed."
Alberhill	2.4.5.5	2-77	Figure 2-10: 500-kV Transmission Line Grounding and Snubbing (Alberhill Project) states: "Grips would be installed on each conductor and connected to a hoist attachment. The conductors would be removed from the insulators, and a crane would be used to raise the conductors to the tower bridge where they would be snubbed (affixed)."	Please modify title and text of Figure as follows: 500-kV Transmission Line Grounding ~~and Snubbing~~ (Alberhill Project) ~~"Grips would be installed on each conductor and connected to a hoist attachment. The conductors would be removed from the insulators, and a crane would be used to raise the conductors to the tower bridge where they would be snubbed (affixed)."~~
Alberhill	2.4.6.2	2-84	Line 13 under heading Import Soil Options states: • "Import Soil Option 2 (Local Quarry): Truck in soil from a quarry, such as Corona Rock and Asphalt (also known as Vulcan Materials Company–Western Division or Corona Quarry), which is located approximately miles from the proposed substation site at 1709 Sherborn Street, Corona, California."	Please modify as follows: • "Import Soil Option 2 (Local Quarry): Truck in soil from a quarry, such as Corona Rock and Asphalt (also known as Vulcan Materials Company–Western Division or Corona Quarry) or other import source, which is located approximately 32 miles from the proposed substation site at 1709 Sherborn Street, Corona, California."
Alberhill	2.4.6.2	2-84	Table 2-12 Alberhill Substation Ground Surface Materials (Quantities Estimated) Cable Trenches - Surface area (acres) 0.002 Cable Trenches – Volume (cubic yards) - 6  Cable trenches [c] | Concrete | 0.002 | 6	SCE suggests the following edits: Surface area (acres) 0.04 Cable Trenches – Volume (cubic yards) – 55  Cable trenches [c] | Concrete | ~~0.002~~ 0.04 | ~~6~~ 55
Alberhill/ Valley-Ivyglen	2.5	2-87	Line 15-16 under heading Operation and Maintenance of the Proposed Projects state: "The applicant inspects transmission and subtransmission lines or segments of the lines at least once per year by driving and/or	SCE suggests the following edits: The applicant inspects transmission and subtransmission lines or segments of the lines at least once per year by driving and/or flying by helicopter along the routes. ~~The applicant inspects the~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			flying by helicopter along the routes. The applicant inspects the entire Serrano–Valley 500-kV Transmission Line by helicopter every other year."	~~entire Serrano–Valley 500-kV Transmission Line by helicopter every other year.~~
Alberhill/ Valley-Ivyglen	2.5	2-87		There are no established adverse health effects of EMF even after 40+ years of research. Therefore EMF is not a CEQA consideration, and it is inappropriate to have the EMF section in the Hazard and Hazardous Materials portion of the EIR. Please include EMF section 4.8.1.6 in Project Description (as done on other project EIRs, such as Mesa Substation, Banducci and West of Devers) Section 2.5 EMFs occur both naturally and as a result of human activity across a broad electrical spectrum. Naturally occurring EMFs are caused by the weather and the earth's geomagnetic field. The fields caused by human activity result from technological application of the electromagnetic spectrum for uses such as communications, appliances, and the generation, transmission, and local distribution of electricity. After several decades of study regarding potential public health and safety risks associated with EMF from power lines, research results remain inconclusive. In 1993, the California Public Utilities Commission (CPUC) implemented decision D.93 11-013, which requires utilities to use "low-cost or no cost" EMF reduction measures for EMFs associated with electrical facilities requiring certification under CPUC GO 131-D. The decision directed utilities to use a 4 percent benchmark for low-cost measures. The applicant included a Field Management Plan as part of its applications for the proposed projects that describes the EMF reduction measures that would be part of the proposed projects. This decision also implemented a number of EMF measurement, research, and education programs. The CPUC did not adopt any specific numerical limits on or regulation of EMF levels related to electric power facilities. The CPUC's January 27, 2006, decision (D.06-01-042) affirmed the 1993 decision on the low-cost/no cost policy to mitigate EMF exposure for new utility transmission and substation projects.

Project	Section	Page	DEIR Language	SCE Recommended Language
				Additionally, the 2006 decision directs the CPUC's Energy Division to pursue and review all available studies regarding EMF and to review scientific information and report on new findings. The CPUC has been unable to determine whether there is a significant scientifically verifiable relationship between EMF exposure and negative health consequences, and no change to the CPUC EMF policy has been made to date. The CPUC will reconsider its EMF policies and open a new rulemaking, as necessary, if new findings indicate negative EMF health impacts. At present, the CPUC does not consider EMFs, in the context of the California Environmental Quality Act (CEQA), to be an environmental impact because there is no agreement among scientists that EMFs create a potential health risk and because CEQA does not define or adopt standards for defining any potential risk from EMFs. Therefore, EMFs are not addressed in the Environmental Impacts and Mitigation Measures section of this document. For further information about EMFs and CPUC guidelines, refer to the CPUC's web page: http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Field
Alberhill/ Valley-Ivyglen	2.6	2-89 2-91	Table 2-12 under heading Project Commitments Table 2-13 under heading Permitting and Consultation Requirements	Sequence of table number is incorrect. SCE suggests the following edits: Table 2-~~12~~13 Table 2-~~13~~14
Alberhill/ Valley-Ivyglen	2.6	2-90	Table 2-12 under heading Project Commitments row Project Commitment H states: "Noise Control and Notification. The applicant shall implement the following noise control measures for the proposed projects: • All construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7 a.m. to 7 p.m. and prohibited on Sundays and all legally proclaimed holidays. SCE will obtain all relevant ministerial or non-discretionary noise permits from local	SCE suggests the following edits to remove potential ambiguities regarding relevant holiday dates: "Noise Control and Notification. The applicant shall implement the following noise control measures for the proposed projects: • All construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7 a.m. to 7 p.m. and prohibited on Sundays and ~~all legally proclaimed~~ holidays recognized by the local jurisdictions. ~~SCE will obtain all relevant ministerial or~~

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td></td><td></td><td></td><td>jurisdictions. In the event that construction activities are necessary on days or hours outside of what is specified by the local ordinance, SCE would provide five-day advanced notification, including a general description of the work to be performed, location and hours of construction anticipated, to the CPUC, the local jurisdiction, and residents within 300 feet of the anticipated work, as well route all construction traffic away from residences, schools and recreational facilities to the extent feasible.”</td><td>~~non-discretionary noise permits from local jurisdictions.~~ In the event that construction activities are necessary on days or hours outside of what is specified by the local ordinance, SCE would provide ~~five-day~~ advanced notification, including a general description of the work to be performed, location and hours of construction anticipated, to the CPUC, the local jurisdiction, and residents within 300 feet of the anticipated work, as well route all construction traffic away from residences, schools and recreational facilities to the extent feasible.”</td></tr>
<tr><td>Alberhill/ Valley-Ivyglen</td><td>2.7</td><td>2-92</td><td>Table 2-13 Under the heading Permitting and Consultation Requirements, under State in the Agency/Group column lists:
<table><tr><td>Santa Ana Regional Water Control Board</td><td>National Pollutant Discharge Elimination System coverage and Clean Water Act Section 401 oversight</td><td>All required Permit Registration Documents (PRDs for Construction General Permit (CGP) for Storm Water Discharge. Section 401 Water Quality Certification.</td></tr></table></td><td>Please modify the table as follows:
<table><tr><td>~~Santa Ana Regional Water Control Board~~ State Water Resources Control Board</td><td>National Pollutant Discharge Elimination System coverage and Clean Water Act Section 401 oversight</td><td>All required Permit Registration Documents (PRDs) for Construction General Permit (CGP) for Storm Water Discharge. Section 401 Water Quality Certification.</td></tr></table></td></tr>
<tr><td>Alberhill/ Valley-Ivyglen</td><td>2-7</td><td>2-92</td><td>Table 2-13 Under the heading Permitting and Consultation Requirements, under the Regional and Local in the Agency/Group column it does not list the Regional Water Quality Control Board.</td><td>Please insert into the table under the Regional and Local section, the following row:</td></tr>
</table>

Project	Section	Page	DEIR Language	SCE Recommended Language
				<table><tr><td>Santa Ana Regional Water Control Board</td><td>National Pollutant Discharge Elimination System coverage. Construction Dewatering oversight.</td><td>Oversight for the Construction General Permit (CGP) for Storm Water Discharge. Dewatering permitting consultation.</td></tr></table>
Alberhill	2-7	2-92	Table 2-13, Under the heading Permitting and Consultation Requirements, under the Regional and Local in the Agency/Group column it does not list the Municipal Separate Storm Sewer System (MS4) requirements.	Please insert into the table under the Regional and Local section, the following row: <table><tr><td>Riverside County Municipal Separate Storm Sewer System (MS4)</td><td>Post-Construction Requirements for Storm Water</td><td>Consultation for Post-Construction Requirements</td></tr></table>
Alberhill	2-7	2-93	Table 2-13, under heading Permitting and Consultation Requirements, on row Riverside County Department of Building and Safety in Consultation or Permit column, it states: "Permit required for construction of the proposed substation and to erect steel."	SCE suggest the following edits: ~~Permit required for construction of the proposed substation and to erect steel.~~
Valley-Ivyglen	3.3.1	3-3	Line 29 under heading VIG Alternative A – Campbell Ranch Road (115-kV Segment VIG8) states: "Under this alternative, proposed Structure VIG566 would be a lightweight steel (LWS) pole rather than a TSP because an I-15 crossing at this location would not be required. The proposed	If the alternative alignment will follow the proposed VIG8 alignment from the intersection of Campbell Ranch Road and Temescal Canyon Road west into Ivyglen Substation, replacement of poles would not be required. The overhead portion of this alternative ("approximately 1,000 feet on LWS

Project	Section	Page	DEIR Language	SCE Recommended Language
			overhead line would continue north along De Palma Road for approximately 1,000 feet on LWS poles, and then descend to an underground position. The alternative would proceed north in a new underground conduit along De Palma Road and Campbell Ranch Road to Temescal Canyon Road. The installation would generally follow the proposed fiber optic line route for 115- kV Segment VIG8, but would be on the west side of Campbell Ranch Road and De Palma Road instead of the east side. VIG Alternative A would be installed as proposed from the intersection of Campbell Ranch Road and Temescal Canyon Road west into Ivyglen Substation. This alternative would require approximately 12,100 feet of duct bank, 10 vaults, two TSP risers, and the replacement of approximately 38 seven existing wood poles with seven TSPs."	poles") is located on De Palma Road where no existing wood poles are present. Therefore SCE suggests the following edits: "Under this alternative, proposed Structure VIG566 would be a lightweight steel (LWS) pole rather than a TSP because an I-15 crossing at this location would not be required. The proposed overhead line would continue north along De Palma Road for approximately 600 ~~1,000~~ feet on TSPs and LWS poles, and then descend to an underground position. The alternative would proceed north in a new underground conduit along De Palma Road and Campbell Ranch Road to Temescal Canyon Road. The installation would generally follow the proposed fiber optic line route for 115- kV Segment VIG8, but would be on the west side of Campbell Ranch Road and De Palma Road instead of the east side. VIG Alternative A would be installed as proposed from the intersection of Campbell Ranch Road and Temescal Canyon Road west into Ivyglen Substation. This alternative would require approximately 12,100 feet of duct bank, 10 vaults, two TSP risers, ~~and~~ one LWS pole, and 2 TSPs ~~the replacement of approximately seven existing wood poles with seven TSPs~~."
Valley-Ivyglen	3.3.2	3-7	Line 4 under heading VIG Alternative B1 – Underground along Santiago Canyon Road (115-kV Segment VIG8) states: "Under this alternative, 115-kV Segment VIG8 would be installed in approximately 3.5 miles of new underground conduit and approximately 12 vaults along De Palma Road, Santiago Canyon Road, and Maitri Road, as well as an unnamed road (Figure 3-1)."	Per a previous data response, SCE suggests the following edits: "Under this alternative, 115-kV Segment VIG8 would be installed in approximately 3.5 miles of new underground conduit and approximately 15-20 ~~12~~ vaults along De Palma Road, Santiago Canyon Road, and Maitri Road, as well as an unnamed road (Figure 3-1)."
Valley-Ivyglen	3.3.4	3-7	Line 40 under heading VIG Alternative C – Underground along Temescal Canyon Road and Horsethief Canyon Road (115-kV Segment VIG6) states: "Under VIG Alternative C, a section of 115-kV Segment VIG6 along Temescal Canyon Road (approximately 1 mile) from Love Lane to Horsethief Road and then south on Horsethief Road to De Palma Road would be installed underground in a new conduit (see Figure 3-2). The existing wood poles along this segment	Under this alternative, SCE assumes the existing Fogarty-Ivyglen 115-kV Subtransmission Line and the existing fiber optic line would remain overhead along Temescal Canyon Road. The fiber optic line following Valley-Ivyglen would also be placed underground. SCE suggests the following edits:

Project	Section	Page	DEIR Language	SCE Recommended Language
			would be removed and the new underground conduit would be capable of supporting two 115-kV circuits (the Valley–Elsinore–Fogarty–Ivyglen 115-kV line and proposed Valley–Ivyglen 115-kV line). 115-kV Segment VIG6, instead of continuing west on Hostetter Road from Temescal Canyon Road, would continue north on Temescal Canyon Road, over I-15, to connect to the VIG Alternative C alignment of 115-kV VIG6. VIG Alternative C would require approximately 25 fewer LWS poles, 12 fewer TSPs, and three fewer guy poles than the proposed Valley–Ivyglen Project. The proposed Valley-Ivyglen Substation, 500-kV transmission lines, remaining sections of 115-kV Segment VIG6, and other 115-kV segments would be the same as those for the proposed Valley-Ivyglen Project."	"Under VIG Alternative C, a section of 115-kV Segment VIG6 along Temescal Canyon Road (approximately 1 mile) from Concordia Ranch Road ~~Love Lane~~ to Horsethief Road and then south on Horsethief Road to De Palma Road would be installed underground in a new conduit (see Figure 3-2). The ~~existing wood poles along this segment would be removed and the~~ new underground conduit would be capable of supporting two 115-kV circuits ~~(the Valley–Elsinore–Fogarty–Ivyglen 115-kV line and proposed Valley–Ivyglen 115-kV line)~~. 115-kV Segment VIG6, instead of continuing west on Hostetter Road from Temescal Canyon Road, would continue north on Temescal Canyon Road, over I-15, to connect to the VIG Alternative C alignment of 115-kV VIG6. VIG Alternative C would require approximately 25 fewer LWS poles, 12 fewer TSPs, and three fewer guy poles than the proposed Valley–Ivyglen Project. The ~~proposed Valley–Ivyglen Substation, 500-kV transmission lines,~~ remaining sections of 115-kV Segment VIG6, and other 115-kV segments would be the same as those for the proposed Valley-Ivyglen Project."
Valley-Ivyglen	3.3.4	3-8	Figure 3-2 The figure shows VIG Alternative C beginning at Love Lane	Please revise the figure to connect Alternative C (alternative Segment VIG6) to Segment VIG5.
Valley-Ivyglen	3.3.6.2	3-9	Line 35 under heading Reasonably Foreseeable Future Actions of Events states: "The Valley–Elsinore–Fogarty–Ivyglen 115-kV Subtransmission Line may exceed designed operating limits as early as 2016 (Table 1-2);"	SCE suggests the following edits: "The Valley–Elsinore–Fogarty~~–Ivyglen~~ 115-kV Subtransmission Line may exceed designed operating limits as early as 2016 (Table 1-2);"
Alberhill	3.4.2	3-10	Line 33 under heading ASP Alternative DD – Serrano Commerce Center Substation Site states: "Approximately 0.25 mile of new access roads would be required for the 500-kV transmission lines under ASP Alternative DD."	When SCE prepared response to Data Request, no engineering was completed. The estimated road length was provided by desktop analysis. SCE suggests the following edits: "Approximately ~~0.25~~ 0.5 mile of new access roads would be required for the 500-kV transmission lines under ASP Alternative DD."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	3.4.2	3-10	Line 30 under heading ASP Alternative DD – Serrano Commerce Center Substation Site states: "Under this alternative, the Alberhill System Project would be built and operated as proposed, except the Alberhill Substation would be constructed in an area covered by Riverside County Specific Plan No. 353 (see Figure 3-3). The 500- kV transmission lines would extend from the substation directly north and tie into the existing Serrano–Valley 500-kV transmission line. 115-kV Segments ASP1 would not be built as proposed. 115-kV Segment ASP1.5 would be expanded to approximately 2 to 4 miles. ASP Alternative DD would involve constructing 115-kV Segment ASP2 aboveground along the path of 115-kV Segments VIG6 and VIG7 instead of crossing I-15. 115-kV Segment ASP2 would be placed below ground with 115-kV Segment VIG8. 115-kV Segment ASP2 would transition to an aboveground power line and would be constructed to follow the planned extension of Temescal Canyon Road, as proposed in Specific Plan No. 353, to the Alberhill Substation site. In addition to ASP2, four new approximately 1.3-mile 115-kV subtransmission lines (one double-circuit and two single-circuit power lines) would extend above ground near the planned extension of Temescal Canyon Road to the Alberhill Substation site. New fiber optic cable would be installed along one of the four 115-kV power lines from the planned extension of Temescal Canyon Road to the Alberhill Substation site. No new access roads would be required for the 115-kV lines under ASP Alternative DD."	Consistent with Data Request H, Alternative DD should include an open air 500-kV switchrack. Similar to the proposed Alberhill Substation, five subtransmission lines on four power lines would extend from Temescal Canyon Road to Alberhill Substation. Further, a physical path survey to determine whether line of sight exists between ASP Alternative DD substation site and Johnstone Peak/Santiago Peak would be needed. Depending on the results of that survey, the tower height at ASP Alternative DD substation site may have to be increased to achieve an unobstructed line of sight. SCE suggests the following edits: "Under this alternative, the Alberhill System Project would be built and operated as proposed except the ~~Alberhill Substation~~ 500-kV switchrack would be all open air and the microwave antenna tower would be approximately 120-feet- to 195-feet-tall, and would be constructed in an area covered by Riverside County Specific Plan No. 353 (see Figure 3-3). The initial build of the Alberhill Substation would connect t~~T~~he 500- kV transmission lines ~~would extend~~ from the substation directly north and tie into the existing Serrano–Valley 500-kV transmission line. Up to five 500-kV Transmission Lines, including a future generation interconnection, may connect to the final build of the substation. 115-kV Segments ASP1 and ASP1.5 would not be built as proposed. ~~115-kV Segment ASP1.5 would be expanded to approximately 2 to 4 miles.~~ ASP Alternative DD would involve constructing 115-kV Segment ASP2 aboveground along the path of 115-kV Segments VIG6 and VIG7, requiring taller poles (minimum 10 feet) to accommodate a double-circuit ~~instead of crossing I-15~~. 115-kV Segment ASP2 would be placed below ground with 115-kV Segment VIG8~~. 115-kV Segment ASP2 would transition to an aboveground power line and would be constructed~~ to ~~follow~~ the planned extension of Temescal Canyon Road, as proposed in Specific Plan No. 353, where it would transition to an aboveground single-circuit power line to the Alberhill Substation site. In addition to ASP2, four new approximately 1.3-mile 115-kV subtransmission lines

Project	Section	Page	DEIR Language	SCE Recommended Language
				(one double-circuit and two single-circuit power lines) would extend above ground near the planned extension of Temescal Canyon Road to the Alberhill Substation site. New fiber optic cable would be installed along one of the four 115-kV power lines from the planned extension of Temescal Canyon Road to the Alberhill Substation site. ~~No~~ Approximately 2 miles of new access roads would be required for the 115-kV lines under ASP Alternative DD. Up to 10 115-kV subtransmission lines may ultimately extend from the substation, as needed. Two additional staging areas would be required near the alternative substation site; one would be located on the west side of Temescal Canyon Road, approximately 800 feet north of Dawson Canyon Road and one would be located on the southwest side of Mayhew Road and Orange Grove Place. A water line would be extended from Temescal Canyon Road to the Alberhill Substation site. Prior to construction, SCE would select a nearby 12 kV distribution circuit to serve as the temporary power source during construction activities at the Alberhill Substation site. The wood poles installed for temporary power would be approximately 40-50 feet tall. It is estimated that 30 wood poles would extend from a nearby 12 kV distribution circuit to the substation construction site. Temporary power would be in place for the duration of construction at the substation site. This alternative would require approximately 1,700-1,870 feet of duct bank, 5-6 vaults, 3-4 TSP risers, 63-70 LWS poles, 57-63 TSPs, 4 wood pole removals, 8 LSTs, and 2 LST removals."
Alberhill/ Valley-Ivyglen	4.1.2.3	4.1-14	Line 1 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General

Project	Section	Page	DEIR Language	SCE Recommended Language
				Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only.
Valley-Ivyglen	4.1.4.1	4.1-42	Line 27 under heading Project Commitments (Valley-Ivyglen) states: "With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore areas where construction of the proposed project would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all areas disturbed during construction of the proposed project, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner."	SCE suggests the following edits: "With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore temporarily impacted areas where construction of the proposed project would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all temporarily impacted areas disturbed during construction of the proposed project, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner."
Valley-Ivyglen	4.1.4.2	4.1-43	Table 4.1-4 Construction Activities Visible from Eligible State Scenic Highways Row Subtransmission construction, Column I-15 states: 115 kV Segments VIG3 through VIG9	SCE suggests the following edits: 115 kV Segments VIG3 through VIG8 ~~VIG9~~

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.1.4.2	4.1-44	Line 12 under heading I-15 states: "Staging areas would be used for up to the 27-month construction period."	To be consistent with the changes in the Project Description, SCE suggests the following edits: "Staging areas would be used for up to the ~~27~~28-month construction period."
Valley-Ivyglen	4.1.4.2	4.1-44	Line 40 under heading SR-74 states: "Construction activities at the staging areas would be visible for up to the 27-month duration of the construction period."	To be consistent with the changes in the Project Description, SCE suggests the following edits: "Construction activities at the staging areas would be visible for up to the ~~27~~28-month duration of the construction period."
Alberhill/ Valley-Ivyglen	4.1.4.2	4.1-46	Line 38 under heading Mitigation Measures states: "MM AES-1: Staging Area Screening. Staging areas will be screened with perimeter screening fences at least 8 feet tall. Perimeter screening fences will be dark in color and covered with a dark-colored (e.g., dark green, brown, or black) fabric or other material that provides at least 50 percent screening."	Fabric material will easily rip in wind that occurs in the area and has been vandalized with graffiti on past projects. Typically, yards are fenced with beige slats for privacy that should achieve the 50 percent screening. SCE suggests the following edits: "MM AES-1: Staging Area Screening. Staging areas will be screened with perimeter ~~screening~~ fences at least 6 ~~8~~ feet tall. Perimeter screening fences will ~~have~~ be ~~dark in color and covered with a dark~~-colored (e.g., dark green, beige, brown, or black) fabric or other material (e.g., slats) that provides at least 50 percent screening."
Valley-Ivyglen	4.1.4.2	4.1-46	Line 42 under heading Mitigation Measures states: "MM AES-2: Segment VIG2 Undergrounding. 115-kV Segment VIG2 shall be placed underground."	SCE would like the CPUC to consider wood poles instead of LWS on Hwy 74 as a mitigation for the potential impacts. If the CPUC determines woods poles would not reduce potential significant impact, SCE requests underground only for those areas with the potential significant impacts (i.e., Hwy 74 within the City of Lake Elsinore). "MM AES-2: Segment VIG2 Wood Poles ~~Undergrounding~~. 115-kV Segment VIG2 shall be placed on wood poles ~~underground~~."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.1.4.2	4.1-48	Line 15 under heading Construction states: "Construction activities at the staging areas would be visible for the 27-month construction period."	To be consistent with the changes in the Project Description, SCE suggests the following edits: "Construction activities at the staging areas would be visible for up to the ~~27~~28-month duration of the construction period."
Valley-Ivyglen	4.1.4.2	4.1-48	Line 32 under heading Operations and Maintenance states: "Structures along sections of the existing Valley-Elsinore-Fogarty-Ivyglen 115-kV line…"	SCE suggests the following edits: "Structures along sections of the existing ~~Valley-Elsinore-~~ Fogarty-Ivyglen 115-kV line…"
Alberhill/ Valley-Ivyglen	4.1.4.2	4.1-50	Line 18 under heading Mitigation Measures, MM AES-3: Glare Reduction states: "Use non-specular conductor and guy wire for all powerlines installed as part of the projectsl Only use lightweight steel, hybrid, guy, and TSPs and LSTs with a galvanized steel that has been treated to create a dulled finish or non-toxic, long-lasting darkening agents that bond with metal or other surfaces and create a darkened finish (unless otherwise required by MM AES-8). As applicable, use steel for the switchrack enclosures and dead-end structures installed as part of Alberhill Substation with a flat finish that will weather to be dull and non-reflective."	MM AES-7 addresses substation equipment and MM AES-8 addresses LSTs. SCE suggests the following edits: "Use non-specular conductor and guy wire for all powerlines installed as part of the projects~~l~~. Only use lightweight steel, hybrid, guy, and TSPs and LSTs with a galvanized steel that has been treated to create a dulled finish or non-toxic, long-lasting darkening agents that bond with metal or other surfaces and create a darkened finish (unless otherwise required by MM AES-7 ~~MM AES-8~~). ~~As applicable, use steel for the switchrack enclosures and dead-end structures installed as part of Alberhill Substation with a flat finish that will weather to be dull and non-reflective~~."
Valley-Ivyglen	4.1.4.2	4.1-50	Line 25 under heading Mitigation Measures states: "MM AES-4: Lake Street Pole Placement and Landscaping. Poles installed along Lake Street for 115-kV Segment VIG5 and for the Fogarty–Ivyglen 115-kV Subtransmission line shall adhere to the following requirements: • Poles shall be set back a minimum of 20 feet from Lake Street's edge of pavement. • SCE shall plant trees with a maximum height and spread of 25 feet at maturity and a minimum height of 10 feet at planting, large shrubs, and other plants within the setback	Installation of wood poles would fit within the existing character of Lake Street. Further, the proposed widening of the Lake Street will likely necessitate the relocation of poles in the future. Therefore, SCE suggests the following edits: "MM AES-4: Lake Street Pole Placement and Landscaping. Poles installed along Lake Street for 115-kV Segment VIG5 and for the Fogarty–Ivyglen 115-kV Subtransmission line shall adhere to the following requirements: • Poles shall be set back an average ~~minimum~~ of 20 feet from Lake Street's edge of pavement.

Project	Section	Page	DEIR Language	SCE Recommended Language
			area between the subtransmission alignment and the Lake Street edge of pavement along the segment. Plantings shall be placed at intervals and in locations to maximize screening of lower portions of the transmission structures in views from the road. Plantings shall be drought tolerant. SCE shall be responsible for ensuring maintenance of the landscaping for five years."	• Wood or galvanized steel poles with surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape shall be used along Lake Street • ~~SCE shall plant trees with a maximum height and spread of 25 feet at maturity and a minimum height of 10 feet at planting, large shrubs, and other plants within the setback area between the subtransmission alignment and the Lake Street edge of pavement along the segment. Plantings shall be placed at intervals and in locations to maximize screening of lower portions of the transmission structures in views from the road. Plantings shall be drought tolerant. SCE shall be responsible for ensuring maintenance of the landscaping for five years.~~"
Valley-Ivyglen	4.1.4.2	4.1-51	Line 32 under heading Mitigation Measures, MM AES-5 states: "Safety and security lighting at staging areas or other areas established for long-duration construction activities, such as laydown areas, will be motion-activated or use timers to reduce impacts of nighttime lighting."	SCE suggest the following edits: "Any new s~~S~~afety and security lighting at staging areas or other areas established for long-duration construction activities, such as laydown areas, will be motion-activated or use timers to reduce impacts of nighttime lighting."
Alberhill	4.1.5.1	4.1-51	Line 42 under heading Project Commitments (Alberhill Project) states: "Project Commitment A: Landscaping and Irrigation Plan: For the Alberhill Project, prior to the start of construction, the applicant would develop a Landscaping and Irrigation Plan for Alberhill Substation that is consistent with surrounding community standards. The applicant would consult with Riverside County about the plan and incorporate applicable County recommendations to the extent possible. Landscaping would be designed to filter views from the surrounding community and other potential sensitive receptors near the proposed substation and be consistent with the surrounding community. The landscape plan would include a plant species list and installation and construction requirements. The applicant	SCE suggests the following edits: "Project Commitment A: Landscaping and Irrigation Plan: For the Alberhill Project, ~~prior to the start of construction~~, the applicant would develop a Landscaping and Irrigation Plan for Alberhill Substation road frontage only along Temescal Canyon Road, Concordia Ranch Road and Love Lane that is consistent with surrounding community standards, substation security and safety requirements. The applicant would consult with Riverside County about the plan and incorporate applicable County recommendations to the extent possible. Landscaping would be designed to filter views from the surrounding community and other potential sensitive receptors near the proposed substation and be consistent with the surrounding community. The landscape plan would include a plant species list and installation

Project	Section	Page	DEIR Language	SCE Recommended Language
			would contract a landscape architect to complete the landscaping plan during final engineering for the Alberhill Project. Irrigation and landscaping installation would occur after construction of the substation perimeter wall and water service has been established. During operations, the applicant would maintain the substation site pursuant to the Landscaping and Irrigation Plan and be responsible for upkeep as long as the applicant owns the property."	and construction requirements. The applicant would contract a landscape architect to complete the landscaping plan during final engineering for the Alberhill Project. Irrigation and landscaping installation would occur after construction of the substation perimeter wall subtransmission and transmission poles/towers erected, underground utility lines/cable ducts installed, and water service has been established. During operations, the applicant would maintain the substation site pursuant to the Landscaping and Irrigation Plan and be responsible for upkeep as long as the applicant owns the property."
Alberhill/ Valley-Ivyglen	4.1.5.1	4.1-52	Line 6 under heading Project Commitments (Alberhill Project), Project Commitment D states: "With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore areas where construction of the proposed project would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all areas disturbed during construction of the proposed project, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner."	Consistent with Project Commitment wording in Table 2-12, page 2-89. SCE suggests the following edits: "With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore temporarily impacted areas where construction of the proposed project would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all temporarily impacted areas disturbed during construction of the proposed project, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner."
Alberhill	4.1.5.2	4.1-55	Line 6 under heading I-15 states: "MM AES-6 would limit grading to only that necessary to construct the proposed project, thus limiting the amount of grading necessary. Extensive construction activities would still be visible, however, and some level of grading would be required. Even with implementation of MM AES-6, visual impacts at the substation site would remain significant."	SCE suggests the following edits: ~~MM AES-6 would limit grading to only that necessary to construct the proposed project, thus limiting the amount of grading necessary. Extensive construction activities would still be visible, however, and some level of grading would be required.~~ Even with implementation of Project Commitment D ~~MM AES-6~~, visual impacts at the substation site would remain significant.

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	4.1.5.2	4.1-58	Line 24 under heading Mitigation Measures states: MM AES-6: Hillside and Natural Slope Preservation. The applicant will limit grading, cut, and fill to the minimum necessary to provide stable areas for drainage, structural foundations, parking facilities, access roads, poles, and other intended uses.	SCE suggests to strike this mitigation measure because temporary and permanent construction areas, submitted to the CPUC, limits grading cut and fill to the minimum necessary. ~~MM AES-6: Hillside and Natural Slope Preservation. The applicant will limit grading, cut, and fill to the minimum necessary to provide stable areas for drainage, structural foundations, parking facilities, access roads, poles, and other intended uses~~.
Alberhill	4.1.5.2	4.1-58	Line 28 under heading Mitigation Measures states: "MM AES 7: Alberhill Substation Visual Treatments. The applicant will consult with a professional landscape architect licensed to work in California to determine what colors to use for the control building and perimeter wall and other aboveground infrastructure associated with the Alberhill Substation."	SCE suggests the following edits because SCE typically uses earth tones for control building and perimeter walls. Further, the use of earth tones is consistent with other light industrial structures in the area. "MM AES-7: Alberhill Substation Visual Treatments. The applicant will~~ consult with a professional landscape architect licensed to work in California to determine what colors to use for the control building and perimeter wall and other~~ prepare a surface treatment plan for the aboveground non-steel structural elements ~~infrastructure~~ associated with the Alberhill Substation. Colors will be selected according to their ability to reduce the aesthetic impact of the substation and ancillary infrastructure. ~~The applicant will also consult with the landscape architect regarding visual treatments, in addition to color, that would reduce aesthetic impacts.~~ The applicant will consult with ~~obtain approval of the selected colors and visual treatments from~~ the California Public Utilities Commission prior to start of construction. All color finishes will be flat and non-reflective. Structural steel associated with the Substation will not be dulled. ~~TSPs, LWS poles, and LSTs within the SCE substation parcel must have color finishes that are dark in color or otherwise colored to help blend the structures with their surroundings. An acceptable treatment is a long-lasting darkening agent that bonds with metal or other surfaces to create a darkened finish.~~"
Alberhill	4.1.5.2	4.1-58	Line 40 under heading Mitigation Measures states:	Per Lines 26-29 on page 4.1-57, MM AES-8 would not reduce impacts to less than significant. SCE suggests striking this MM.

Project	Section	Page	DEIR Language	SCE Recommended Language
			"MM AES-8: Treatment of 500-kV Transmission Towers. 500-kV Towers SA2/R4, VA2/R5, SA3/R7, VA3/R8, SA4/R12, and VA4/R11 will have color finishes that are dark in color or otherwise colored to help blend the structures with their natural surroundings. An acceptable treatment is a long-lasting darkening agent that bonds with metal or other surfaces to create a darkened finish."	~~MM AES-8: Treatment of 500-kV Transmission Towers. 500-kV Towers SA2/R4, VA2/R5, SA3/R7, VA3/R8, SA4/R12, and VA4/R11 will have color finishes that are dark in color or otherwise colored to help blend the structures with their natural surroundings. An acceptable treatment is a long-lasting darkening agent that bonds with metal or other surfaces to create a darkened finish.~~
Alberhill	4.1.5.2	4.1-59	Line 30 under heading Construction states: "...would occur for the 27-month construction period."	To be consistent with the changes in the Project Description, SCE suggests the following edits: ...would occur for the ~~27~~28-month construction period.
Alberhill	4.1.5.2	4.1-60	Line 14 under heading Operation and Maintenance states: "At Key Viewpoint 14, as shown in the visual simulation (Figure 4.1-4o), a new, single-circuit 115-kV subtransmission line would be installed on new TSPs where there currently are no TSPs. Wood poles in the background in the left of the viewpoint would be replaced with TSPs to accommodate the second 115-kV circuit. The proposed TSPs in the left of the view would be comparable in line. The TSPs would differ in form due to their taller heights."	SCE suggests the following edits: At Key Viewpoint 14, as shown in the visual simulation (Figure 4.1-4o), a new, single-circuit 115-kV subtransmission line would be installed on new LWS poles ~~TSPs~~ where there currently are no LWS poles ~~TSPs~~. Wood poles in the background in the left of the viewpoint would be replaced with LWS poles ~~TSPs~~ to accommodate the second 115-kV circuit. The proposed LWS poles ~~TSPs~~ in the left of the view would be comparable in line. The LWS poles ~~TSPs~~ would differ in form due to their taller heights.
Alberhill	4.1.5.2	4.1-61	Line 38 under heading Mitigation Measures states: "MM AES-9. Use self-weathering steel poles. Self-weathering steel poles shall be used on all of 115-kV Segment ASP6 (except where undergrounding is required per MM AES-10) and 115-kV Segments ASP4 and ASP5 in the following locations: • 115-kV Segment ASP4 - From the intersection of Murrieta Road and La Piedra Road to the intersection of Murrieta Road and Craig Avenue. - From the intersection of Murrieta Road and Beth Avenue to the intersection of Murrieta Road and Scott Road/Bundy Canyon Road.	With respect to Mitigation Measure AES-9 which requests SCE use poles made of self-weathering steel, SCE does not currently use this type of pole. Therefore, SCE does not have any experience with constraints that may be associated with the use with this type of pole and has not been able to perform an engineering analysis to determine if it is feasible for this project. For this reason and a number of other reasons, SCE has significant concerns about using these types of poles. SCE's concerns include, but are not limited to the following: • Due to high potential for corrosion and rusting, these are not ideal in areas that are exposed to long periods of wetness and/or moisture (e.g., high humidity or fog). The corrosion and rusting could create a safety issue

Project	Section	Page	DEIR Language	SCE Recommended Language
			• 115-kV Segment ASP5 - From the intersection of Murrieta Road and Scott Road/Bundy Canyon Road to 520 feet northeast of the intersection of Citrus Grove and Lemon Street. - From the intersection of Almond Street and Lemon Street to the intersection of Waite Street and Jo Ann Court."	because the moisture could result in a loss of the structural integrity of the poles. Here the existing environment consists of landscaping, therefore, the proposed alignment would result in poles being exposed to wetness from irrigation. • Because self-weatherizing poles are larger and heavier, larger equipment such as cranes, additional concrete trucks or truck trips, and larger drilling rigs may be needed, which could result in additional impacts. • For the poles where riser attachments are required, the concrete footing can create issues as the pole base is much larger than the pole, which, depending on final engineering, could necessitate the installation of additional poles for distribution and/or telecommunications lines. • In addition, self-weathering steel cross-arms may present problems such as rust contaminating insulators. SCE is concerned that such contamination could result in the insulators flashing over, potentially resulting in de-energizing of the circuit. As a result, SCE suggests the following edits: "MM AES-9. Use <u>wood or galvanized</u> ~~self-weathering~~ steel poles. <u>Wood or galvanized steel poles with surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape</u> ~~Self-weathering steel poles~~ shall be used on all of 115-kV Segment ASP6 (except where undergrounding is required per MM AES-10) and 115-kV Segments ASP4 and ASP5 in the following locations: • 115-kV Segment ASP~~4~~<u>6</u> - From the intersection of Murrieta Road and La Piedra Road to the intersection of Murrieta Road and Craig Avenue.

Project	Section	Page	DEIR Language	SCE Recommended Language
				- From the intersection of Murrieta Road and Beth Avenue to the intersection of Murrieta Road and Scott Road/Bundy Canyon Road. • 115-kV Segment ASP5 - From the intersection of Murrieta Road and Scott Road/Bundy Canyon Road to 520 feet northeast of the intersection of Citrus Grove and Lemon Street. - From the intersection of Almond Street and Lemon Street to the intersection of Waite Street and Jo Ann Court."
Alberhill	4.1.5.2	4.1-61	Line 9 under heading Operation and Maintenance states: "As shown in the visual simulation for Key Viewpoint 14, the installation of the TSPs where there currently are none in front of the Calder Ranch development would somewhat reduce the vividness;"	SCE suggests the following edits: "As shown in the visual simulation for Key Viewpoint 14, the installation of the LWS poles ~~TSPs~~ where there currently are none in front of the Calder Ranch development would somewhat reduce the vividness;"
Alberhill/ Valley-Ivyglen	4.2.2.3	4.2-2	Line 38 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.3.1	4.3-1	Line 20 under heading Climate states: "The Valley–Ivyglen Project and Alberhill Project activities would occur in rural and low-density residential areas of the Cities of Lake Elsinore, Perris, Wildomar, and Menifee and in unincorporated western Riverside County, which are in the eastern portion of the South Coast Air Basin (SCAB)."	To be consistent with other impact settings, SCE suggests the following edits: "The Valley–Ivyglen Project and Alberhill Project activities would occur in rural and low-density residential areas of the Cities of Lake Elsinore, Perris, Wildomar, ~~and~~ Menifee, Orange, and in unincorporated western Riverside County, which are in the eastern portion of the South Coast Air Basin (SCAB)."
Alberhill/ Valley-Ivyglen	4.3.2.3	4.3-8	Line 7 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen	4.3.2.3	4.3-9		SCE suggests to include a General Plan discussion for each city to be consistent with other sections: City of Perris Circulation Element Goal VII Policy VII.A.4 Control dust and mitigate other environmental impacts during all stages of roadway construction consistent with air quality regulations and mitigation measures established in environmental documents.

Project	Section	Page	DEIR Language	SCE Recommended Language
				Healthy Community Element Goal HC-6 Policy HC 6.1 Support regional efforts to improve air quality through energy efficient technology, use of alternative fuels, and land use and transportation planning Policy HC 6.3 Promote measures that will be effective in reducing emissions during construction activities o Perris will ensure that construction activities follow existing South Coast Air Quality Management District (SCAQMD) rules and regulations o All construction equipment for public and private projects will also comply with California Air Resources Board's vehicle standards. For projects that may exceed daily construction emissions established by the SCAQMD, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the SCAQMD o Project proponents will be required to prepare and implement a Construction Management Plan which will include Best Available Control Measures among others. Appropriate control measures will be determined on a project by project basis, and should be specific to the pollutant for which the daily threshold is exceeded
Valley-Ivyglen and Alberhill	4.3.2.3	4.3-9	Line 1 under the heading South Coast Air Quality Management District and the discussion of the Air Quality Management Plan, states: "FUG-01 – VOC Reductions from Vacuum Trucks: This measure seeks to reduce emissions from vacuum trucks (which are often used to transport gasoline). The only current regulation of vacuum truck emissions is relate to use of vacuum trucks for tank and pipeline degassing control devices. Compliance would occur through establishing a new rule or regulation related to use of control technology."	SCE suggests the following edits: ~~"FUG-01 – VOC Reductions from Vacuum Trucks: This measure seeks to reduce emissions from vacuum trucks (which are often used to transport gasoline). The only current regulation of vacuum truck emissions is relate to use of vacuum trucks for tank and pipeline degassing control devices. Compliance would occur through establishing a new rule or regulation related to use of control technology."~~
Valley-Ivyglen	4.3.4.1	4.3-11	Line 12 under Project Commitment J states:	SCE suggests the following edits:

Project	Section	Page	DEIR Language	SCE Recommended Language
			"Water storage piles twice a day, resulting in a 50% fugitive dust control efficiency."	"Water storage piles twice a day or as needed, resulting in a 50% fugitive dust control efficiency."
Valley-Ivyglen	4.3.4.2	4.3-11	Line 25 under the heading Impacts Analysis (Valley-Ivyglen Project) and Construction states: "Three VOC-reducing policies could relate to construction of the proposed Valley-Ivyglen Project, since the project could involve architectural coatings, adhesives, solvents, and vacuum trucks (for fuel transport). Any of the three relevant AQMD control measures (CTS-01, CTS-02, or FUG-01) would be developed into SCAQMD rules and regulations as they become enforceable."	SCE suggests the following edits: "Three VOC-reducing policies could relate to construction of the proposed Alberhill Project, since the project could involve architectural coatings, adhesives, and solvents~~, and vacuum trucks (for fuel transport)~~. Any of the ~~three~~ two relevant AQMD control measures (CTS-01, CTS-02~~, or FUG-01~~) would be developed into SCAQMD rules and regulations as they become enforceable."
Alberhill/ Valley-Ivyglen	4.3.4.2	4.3-15	Line 8 under heading Mitigation Measures, MM AQ-1 states: • Provide carpool shuttles and vans to transport construction workers to and from construction sites 8 to minimize private vehicle use; • Minimize construction-related transport of workers and equipment including trucks; and • Require that on-road vehicles utilized during construction be less than 10 years old.	SCE suggests the following edits: • ~~Provide~~ Encourage carpooling ~~shuttles and vans to transport construction workers~~ to and from staging yards to construction sites to minimize private vehicle use; • Minimize construction-related transport of workers and equipment including trucks; and • Require that on-road vehicles utilized during construction meet CARB fleet regulations ~~be less than 10 years old~~.
Valley-Ivyglen	4.3.4.2	4.3-15	Line 13 under the heading Mitigation Measure, the measure states: "MM AQ-2: Oxides of Nitrogen (NOX) Credits. The remaining emissions of NOX resulting from construction of the proposed project shall be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs) for every pound of NOX in excess of the SCAQMD regional significance threshold of 100 pounds per day, as measured per project. The total amount of NOX RTCs to be purchased shall be calculated once the construction schedules for each project are finalized. The applicant shall purchase and submit documentation of purchase	Peak daily construction estimates are based on overlapping construction equipment, phasing, and workforce tables which result in highly-conservative estimates. SCE proposes to purchase RTCs, MSERCs or a combination thereof to offset excess emissions. In addition to providing a greater environmental benefit, including this flexibility would potentially reduce the cost of offsetting emissions in excess of the applicable thresholds. Furthermore, SCE suggests removing the monitoring requirement to reduce the amount of time and effort (cost) needed by crews and environmental specialists to substantiate the amount of credits purchased.

Project	Section	Page	DEIR Language	SCE Recommended Language
			of the required RTCs to the SCAQMD prior to the start of construction of each project. The applicant shall also track actual daily emissions during construction of each project according to a monitoring plan, which shall require keeping records of equipment and vehicle usage for each project."	SCE suggests the following edits: MM AQ-2: Oxides of Nitrogen (NOX) Credits. The remaining emissions of NOX resulting from construction of the proposed projects shall be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs for every pound of NOX in excess of the SCAQMD regional significance threshold of 100 pounds per day, as measured per project. The total amount of NOX RTCs to be purchased shall be calculated once the construction schedules for each project are finalized. The applicant shall purchase and submit documentation of purchase of the required NOX emission credits to the SCAQMD prior to the start of construction of each project. ~~The applicant shall also track actual daily emissions during construction of each project according to a monitoring plan, which shall require keeping records of equipment and vehicle usage for each project.~~
Valley-Ivyglen	4.3.4.2	4.3-15	Line 22 under heading Mitigation Measures states: "MM AQ-3: Additional Fugitive Dust Controls. During construction activities, the applicant shall implement the following measures to minimize impacts due to fugitive dust emissions: • Use a gravel apron, to reduce mud/dirt trackout from unpaved truck exit routes. Dimensions of such apron shall be 25 feet long by the width of the exit road. • Ensure minimum soil moisture of 12 percent for earthmoving activities by use of a moveable sprinkler system or a water truck. Moisture content shall be measured using a moisture probe onsite and reported to the CPUC on a monthly basis. • Apply chemical soil stabilizers on inactive construction areas or disturbed lands within construction areas that are unused for at least four consecutive days.	SCE suggests the following edits per the reasons below (in italics): "MM AQ-3: Additional Fugitive Dust Controls. During construction activities, the applicant shall implement the following measures to minimize impacts due to fugitive dust emissions: *Bullet 1: Required per Rule 403 and therefore SCE must comply and this should not be a mitigation measure* • ~~Use a gravel apron, to reduce mud/dirt trackout from unpaved truck exit routes. Dimensions of such apron shall be 25 feet long by the width of the exit road.~~ *Bullet 2: Duplicative of Project Commitment J in which SCE is already required to water three times per day or as needed,*

Project	Section	Page	DEIR Language	SCE Recommended Language
			• All trucks hauling dirt, sand, soil, or other loose materials shall be tarped with a fabric cover and maintain a freeboard height of 12 inches."	*therefore there is no need to require onsite moisture monitoring, which would be overly burdensome for SCE to comply.* • ~~Ensure minimum soil moisture of 12 percent for earthmoving activities by use of a moveable sprinkler system or a water truck. Moisture content shall be measured using a moisture probe onsite and reported to the CPUC on a monthly basis.~~ *Bullet 3: Required per SWPPP and Rule 403 and therefore SCE must comply and this should not be a mitigation measure.* • ~~Apply chemical soil stabilizers on inactive construction areas or disturbed lands within construction areas that are unused for at least four consecutive days.~~ *Bullet 4: Required per Rule 403 and therefore SCE must comply and this should not be a mitigation measure.* • ~~All trucks hauling dirt, sand, soil, or other loose materials shall be tarped with a fabric cover~~ or watered down with ~~and maintain a freeboard height of 12 inches.~~"
Alberhill	4.3.5.4	4.3-20	Line 2 under the heading Impact AQ-1 (ASP) states: "Three VOC-reducing policies could relate to construction of the proposed Alberhill Project, since the project could involve architectural coatings, adhesives, solvents, and vacuum trucks (for fuel transport). Any of the three relevant AQMD control measures (CTS-01, CTS-02, or FUG-01) would be developed into SCAQMD rules and regulations as they become enforceable."	SCE suggests the following edits: "Three VOC-reducing policies could relate to construction of the proposed Alberhill Project, since the project could involve architectural coatings, adhesives, and solvents~~, and vacuum trucks (for fuel transport)~~. Any of the ~~three~~ two relevant AQMD control measures (CTS-01, CTS-02~~, or FUG-01~~) would be developed into SCAQMD rules and regulations as they become enforceable."
Alberhill	4.3.5.4	4.3-23	Line 29 under the heading Mitigation Measure states:	Peak daily construction estimates are based on overlapping construction equipment, phasing, and workforce tables which result in highly-conservative estimates. SCE proposes to

Project	Section	Page	DEIR Language	SCE Recommended Language
			"MM AQ-5: Volatile Organic Compounds Credits: The remaining emissions of VOC/reactive organic gas (ROG) resulting from construction of the proposed Alberhill Project shall be mitigated through the purchase of Emissions Trading Credits (ETCs) for every pound of VOC/ROG in excess of the SCAQMD regional significance threshold of 100 pounds per day, as measured. The total amount of VOC/ROG ETCs to be purchased shall be calculated once the construction schedule is finalized. The applicant shall purchase and submit documentation of purchase of the required ETC to the SCAQMD prior to construction. The applicant shall also track actual daily emissions during construction according to the monitoring plan, which shall require keeping records of equipment and vehicle usage for the project."	purchase ERCs/STERCs, MSERCs or a combination thereof to offset excess emissions. In addition to providing a greater environmental benefit, including this flexibility would potentially reduce the cost of offsetting emissions in excess of the applicable thresholds. Furthermore, SCE suggests removing the monitoring requirement to reduce the amount of time and effort (cost) needed by crews and environmental specialists to substantiate the amount of credits purchased. Since emissions calculations are highly conservative, SCE believes that the requirement to track emissions would be overly burdensome and of no value. SCE suggests the following edits: "MM AQ-5: Volatile Organic Compounds Credits. The remaining emissions of VOC/reactive organic gas (ROG) resulting from construction of the proposed Alberhill Project shall be mitigated through the purchase of Emissions ~~Trading~~ Reduction Credits (~~ETCs~~ ERCs)/Short-Term Emission Reduction Credits (STERCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of ERCs/STERCs and MSERCs for every pound of VOC/ROG in excess of the SCAQMD regional significance threshold of ~~100~~ 75 pounds per day, as measured. The total amount of VOC/ROG ~~ETCs~~ ERCs/MSERCs to be purchased shall be calculated once the construction schedule is finalized. The applicant shall purchase and submit documentation of purchase of the required ~~ETCs~~ ERCs/MSERCs to the SCAQMD prior to construction. ~~The applicant shall also track actual daily emissions during construction according to the monitoring plan, which shall require keeping records of equipment and vehicle usage for the project.~~"
Valley-Ivyglen	4.4.1.1	4.4-1	Line 35 under heading Data Sources states: "For the purpose of this document, Valley–Ivyglen Project Phase 1 encompasses 115-kV Segments VIG4 through VIG8, and Phase 2 encompasses 115-kV Segments VIG1 through VIG3."	SCE suggests the following edits: "For the purpose of this document, Valley–Ivyglen Project Phase 1 encompasses 115-kV Segments VIG1 ~~VIG4~~ through VIG3 ~~VIG8~~, and Phase 2 encompasses 115-kV Segments VIG4 ~~VIG1~~ through VIG8 ~~VIG3~~."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.4.1.1	4.4-4	Line 5 under the heading Jurisdictional Features Assessment Methods states: "The surveys were performed with consideration of the following agencies and regulations that would have jurisdictional authority over hydrologic resources in the proposed project area: USACE, CDFW, Regional Water Quality Control Board (RWQCB), and MSHCP."	MSHCP is not an agency; therefore, SCE suggests the following edits: "The surveys were performed with consideration of the following agencies ~~and regulations~~ that would have jurisdictional authority over hydrologic resources in the proposed project area: USACE, CDFW, Regional Water Quality Control Board (RWQCB), and the USFWS~~SMSHCP~~."
Alberhill/ Valley-Ivyglen	4.4.1.2	4.4-4	Line 47 under the heading Southern Cottonwood-Willow Riparian Forest and Southern Willow Scrub (Special Status) states: "Plant species associated with this community include wax myrtle, Mexican elderberry, mulefat, and California sycamore."	SCE suggests the following edits to the vegetation community description per Preliminary Description of the Terrestrial Natural Communities of California (Holland 1986): "Plant species associated with this community include Arroyo willow, Fremont cottonwood, Black willow, and red willow ~~wax myrtle, Mexican elderberry, mulefat, and California sycamore~~."
Alberhill/ Valley-Ivyglen	4.4.1.2	4.4-5	Line 13 under the heading Southern Sycamore Alder Riparian Woodland (Special Status) states: "Species associated with this community include slender wild oats, valley oak, Fremont cottonwood, and arroyo willow."	SCE suggests the following edits to the vegetation community description per Preliminary Description of the Terrestrial Natural Communities of California (Holland 1986): "Species associated with this community include California sycamore and white alder ~~slender wild oats, valley oak, Fremont cottonwood, and arroyo willow~~."
Alberhill/ Valley-Ivyglen	4.4.1.4	4.4-7	Footnote 2 regarding language under the heading Special Status Plants and Wildlife states: "Focused wildlife surveys are those undertaken according to methods outlined by the Western Riverside MSCHP. Protocol-level surveys are those undertaken according to standards or guidelines published by wildlife agencies (e.g., CDFW, USFWS) or professional wildlife organizations (e.g., California Burrowing Owl Consortium)."	Please add protocol reference for BUOW per the MSHCP as follows: "Focused wildlife surveys are those undertaken according to methods outlined by the Western Riverside MSCHP. Protocol-level surveys are those undertaken according to the Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area (County of Riverside 2006), standards or guidelines published by wildlife agencies (e.g., CDFW, USFWS) or professional wildlife organizations (e.g., California Burrowing Owl Consortium)."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.4.1.4	4.4-8	Figure 4.4-1 shows all Castle and Cooke parcels in the vicinity of the proposed projects.	The Castle and Cooke Tri-Valley parcel located east of Lake Street is not exempt from the MSHCP. It was not included in the settlement agreement, and Castle and Cooke recently completed the Joint Project Review process with the RCA and City of Lake Elsinore. Furthermore, the 9.09 acre parcel located at the southwest corner of the I-15/Lake Street interchange, just north of Temescal Canyon Road, was acquired by Castle and Cooke after the settlement agreement and is therefore not exempt from the requirements of the MSHCP. Please see Attachment D showing the Castle and Cooke exempt properties in yellow. Please revise Figure 4.4-1 accordingly.
Alberhill/ Valley-Ivyglen	4.4.2.1	4.4-10	Line 35 under the heading Section 401 states: "In California, the RWQCB administers the Section 401 Water Quality Certification Program. Section 401 certification is required before the USACE may issue a Section 404 permit for discharge of dredged or fill material into waters of the U.S. Many states, including California, rely on Section 401 certification as a primary regulatory tool for protecting wetlands and other aquatic resources."	SCE suggests the following edits to update regulatory agency name and information: "In California, outside of tribal areas, the SWRCB along with the nine Regional Boards~~RWQCB~~ administer~~s~~ the Section 401 Water Quality Certification Program. Section 401 certification is required before the USACE may issue a Section 404 permit for discharge of dredged or fill material into waters of the U.S. ~~Many states, including California, rely on Section 401 certification as a primary regulatory tool for protecting wetlands and other aquatic resources~~."
Alberhill/ Valley-Ivyglen	4.4.2.3	4.4-11	Line 19 under heading Regional and Local states:	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public

Project	Section	Page	DEIR Language	SCE Recommended Language
				utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Alberhill/ Valley-Ivyglen	4.4.2.3	4.4-12	Line 32 under the heading Western Riverside County Multiple Species Habitat Conservation Plan states: "All components of the proposed project would be located within the MSHCP area except for the 115-kV Segment ASP2 and VIG5 sections that traverse the Castle and Cooke property (Figure 4.4-1). The Castle and Cooke property is exempt from measures or restrictions presented in the MSHCP. However, the applicant is entering into an agreement with the RCA to allow for coverage of the proposed project under the MSHCP on Castle and Cooke property."	Please update the DEIR language to indicate that not all Castle and Cooke properties are exempt from the MSHCP requirements; rather only those parcels listed in the settlement agreement. Also, please update the status of SCE's PSE application as follows: ~~"All components of the proposed project would be located within the MSHCP area except for the 115-kV Segment ASP2 and VIG5 sections that traverse the Castle and Cooke property (Figure 4.4-1). The Castle and Cooke property is exempt from measures or restrictions presented in the MSHCP. However, the applicant is entering into an agreement with the RCA to allow for coverage of the proposed project under the MSHCP on Castle and Cooke property.~~ All components of the proposed project would be located within the MSHCP area. Portions of the 115-kV Segment ASP2 and VIG5 sections traverse the Castle and Cooke property (Figure 4.4-1), some of which are exempt from MSHCP requirements per the terms of a settlement agreement. While the settlement agreement may have excluded Castle and Cooke from the requirements of the MSHCP, their properties are still within the boundaries of the MSHCP and incidental take authorization will be extended to SCE on these properties pursuant to the PSE process. The MSHCP's original CEQA and NEPA analysis and the language in the MSHCP documents expects that the MSHCP, including the PSE process, will be implemented as originally described even on the settlement agreement properties. SCE has coordinated extensively with RCA, USFWS, and CDFW, and is currently in the process of obtaining PSE status, through a Certificate of Inclusion, to allow for coverage of the entire proposed project alignment, including areas that traverse on Castle and Cooke exempted property."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.4.2.3	4.4-13	Line 18 under the heading Western Riverside County Multiple Species Habitat Conservation Plan states: "The RCA has issued the applicant a Certificate of Inclusion (COI) to become a Participating Special Entity (PSE) for the Valley–Ivyglen Phase 1 Project (SCE 2014b), and the applicant plans to submit PSE applications to the RCA for Valley–Ivyglen Phase 2 and the Alberhill Project in August and October 2015, respectively."	Please update the status of SCE's PSE applications as follows: "The RCA has issued the applicant a Certificate of Inclusion (COI) to become a Participating Special Entity (PSE) for the Valley–Ivyglen Phase 1 Project (SCE 2014b)~~., and t~~The applicant submitted a PSE application to the RCA for the Valley–Ivyglen Phase 2 in March 2016 and plans to submit a PSE application~~s to the RCA for Valley–Ivyglen Phase 2 and~~ for the Alberhill Project in 2016 or 2017~~August and October 2015, respectively~~."
Alberhill/ Valley-Ivyglen	4.4.2.3	4.4-13	Line 26 under the heading Additional Reserve Land states: "The MSHCP includes provisions for the acquisition of Additional Reserve Land (ARL) to conserve habitat needed to meet the goals and objectives of the MSHCP. Figure 4.4-1 show the locations of ARLs along the proposed projects. All MSHCP requirements apply to activities within Western Riverside County RCA ARL. Where ARL is also located within SKR HCP areas (Figure 4.4-1), all SKR HCP requirements also apply. SKR HCP core reserve requirements (e.g., requirements for the Lake Mathews-Estelle Mountain Core Reserve; Figure 4.4-1) do not apply to ARL."	The SKR HCP core reserve and ARL areas do not overlap. The core reserve areas are Public/Quasi-Public (PQP) land, not ARL land. Recommend deleting the last sentence. "The MSHCP includes provisions for the acquisition of Additional Reserve Land (ARL) to conserve habitat needed to meet the goals and objectives of the MSHCP. Figure 4.4-1 show the locations of ARLs along the proposed projects. All MSHCP requirements apply to activities within Western Riverside County RCA ARL. ~~Where ARL is also located within SKR HCP areas (Figure 4.4-1), all SKR HCP requirements also apply. SKR HCP core reserve requirements (e.g., requirements for the Lake Mathews-Estelle Mountain Core Reserve; Figure 4.4-1) do not apply to ARL."~~
Alberhill/ Valley-Ivyglen	Section 4.4.4.1	4.4-17	Line 30 under the heading Project Commitments (Valley-Ivyglen Project), Project Commitment C states: "Project Commitment C: Raptor Protection on Power Lines. The applicant would design all 115-kV subtransmission structures consistent with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC 2006)."	The APLIC 2006 Manual is incorrectly referenced, SCE suggests the following edits: "Project Commitment C: Raptor Protection on Power Lines. The applicant would design all 115-kV subtransmission structures consistent with the Suggested Practices for ~~Raptor~~ Avian Protection on Power Lines: The State of the Art in 2006 (APLIC 2006)."
Valley-Ivyglen	4.4.4.1	4.4-17	Line 33 under heading Project Commitment (Valley-Ivyglen Project) states:	For consistency with Table 2-12, SCE suggests the following edits:

Project	Section	Page	DEIR Language	SCE Recommended Language
			"Project Commitment D: Habitat Restoration and Revegetation Plan. With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore areas where construction of the proposed projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all areas disturbed during construction of the proposed projects, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner."	"Project Commitment D: Habitat Restoration and Revegetation Plan. With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore <u>temporarily impacted</u> areas where construction of the proposed projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all <u>temporarily impacted</u> areas disturbed during construction of the proposed projects, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner."
Alberhill/ Valley-Ivyglen	4.4.4.1	4.4-18	Line 1 under heading Project Commitment (Valley-Ivyglen Project) states: "Project Commitment H: Noise Control. All construction and general maintenance activities, except in an emergency, would be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and all legally proclaimed holidays. If the California Independent System Operator and/or California Department of Transportation require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday, the applicant would obtain variances from all applicable jurisdictions. • Construction equipment would use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. • Construction traffic would be routed away from residences and schools where feasible. • Unnecessary construction vehicle use and idling time would be minimized to the extent feasible. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where	For consistency with Table 2-12, SCE suggests the following edits: "Project Commitment H: Noise Control. • All construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and ~~all legally proclaimed~~ holidays <u>recognized by the local jurisdictions</u>. ~~If the California Independent System Operator (CAISO) and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday, SCE would obtain variances from all applicable jurisdictions.~~ <u>In the event that construction activities are necessary on days or hours outside of what is specified by the local ordinance, SCE would provide advanced notification, including a general description of the work to be performed, location and hours of construction anticipated, to the CPUC, the local jurisdiction, and residents within 300 feet of the anticipated work.</u>

Project	Section	Page	DEIR Language	SCE Recommended Language
			vehicles are needed or staged. A "common sense" approach to vehicle use would be applied; if a vehicle is not required for use immediately or continuously for construction activities, its engine should be shut off. Note: certain equipment, such as large diesel-powered vehicles, require extended idling for warm-up and repetitive construction tasks. • The applicant would notify all receptors within 500 feet of construction of the potential to experience significant noise levels during construction. • During construction, the applicant would use sound walls, noise-reduction blankets, or other noise reduction measures prior to developing the project site in areas where sensitive receptors would be subjected to significant noise impacts. • The applicant would shield small stationary equipment with portable barriers within 100 feet of residences. • The applicant would minimize engine idling and turn off engines when not in use. • Where blasting is required, the applicant would conduct additional pre-blast notification and coordination with residents, utilities, and others that may be affected by blasting operations."	• 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. • Construction traffic shall be routed away from residences and schools where feasible. • Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. A "common sense" approach to vehicle use shall be applied; if a vehicle is not required for use immediately or continuously for construction activities, its engine should be shut off. Note: certain equipment, such as large diesel-powered vehicles require extended idling for warm-up and repetitive construction tasks. • The applicant will notify all receptors within 3~~5~~00 feet of construction of the potential to experience significant noise levels during construction. • During construction, the applicant will use a temporary noise barrier between the construction area and the residence ~~sound walls, noise-reduction blankets, or other noise reduction measures prior to developing the project site~~ in areas where sensitive receptors would be subjected to significant noise impacts. • The applicant would shield small stationary equipment with portable barriers within 100 feet of residences, where feasible. • The applicant would minimize engine idling and turn off engines when not in use. • Where blasting is required, the applicant would conduct additional pre-blast notification and coordination with residents, utilities, and others that may be affected by blasting operations."

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.4.4.1	4.4-18		These Project Commitments support a consistency determination with the MSHCP. Under the heading "Project Commitments (Valley-Ivyglen Project), please add the following based on the applicant's PSE application: "Project Commitment I: San Diego Ambrosia. During construction, ground-disturbing activities including parking and staging of equipment and vehicles off-road within 50 feet of known populations of San Diego Ambrosia, the following will be implemented: • Work should occur in the late summer/early fall (August to October) to avoid: 1) the San Diego ambrosia blooming season and 2) wet soil conditions during the rainy season when work could result in damage to the growing plant/rhizomes. If work, such as pole brushing, is required at other times, a biological monitor will be present to locate the San Diego ambrosia for avoidance. As a general rule, no work is allowed within 72 hours following a rain event but dry site conditions will be verified by crews prior to initiation of work. • If equipment and vehicles need to be situated over the plant population, metal grates or plywood sheets (depending on the size of equipment) will be placed over the plants temporarily. • A biological monitor will be present during ground disturbing activities to ensure avoidance and minimization of impacts to San Diego Ambrosia." "Project Commitment J: ARL Land. Temporary impacts to MSHCP ARLs will be restored to greatest extent practicable using species present prior to disturbance. Should any permanent impacts to ARL result during construction, the Applicant will dedicate biologically equivalent or superior land to the MSHCP. The Applicant will prepare an ARL equivalency analysis to be included as part of the MSHCP PSE submittal. This equivalency analysis will compare the potential effects on the ARL to the benefits of proposed replacement land, including compensation

Project	Section	Page	DEIR Language	SCE Recommended Language
				for potentially lost conservation functions and values. The analysis will consider specific project design features, siting and design, and MSHCP BMPs, as well as address effects on covered species and habitats, core areas, linkages, constrained linkages, MSHCP Conservation Area configuration and management, and ecotones. The replacement land ratio is anticipated to be not less than 2:1 within MSHCP Core 1 but will ultimately be determined through MSHCP consistency findings made by RCA, CDFW and USFWS concurrence as part of the MSHCP PSE process." "Project Commitment K: Wildlife Movement. In the event that retaining walls or some other structural method of slope stabilization would be needed, walls will be sited, designed, and oriented to minimize impacts to movement of native resident wildlife species and established wildlife corridors, in coordination with the RCA, USFWS, and CDFW."
Valley-Ivyglen	4.4.4.2	4.4-21	Line 1 under the heading Critical Habitat for Coastal California Gnatcatcher, Munz's Onion, Thread-leaved Brodiaea, and San Diego Ambrosia states: "Impacts on critical habitat for these species would be reduced through the implementation of Project Commitments B and D. However, impacts from the construction and operation of the proposed Valley Ivyglen Project would be significant. Implementation of MMs BR-1 through BR-9, which restrict construction to certain work areas, require worker environmental training, limit the amount of native vegetation that is disturbed during construction, restrict disturbance near active gnatcatcher nests, and require development of a restoration and revegetation plan, would reduce these impacts to less than significant by reducing the amount of disturbance to critical habitat for these species and requiring that disturbed areas be restored post-construction."	Please insert the following language from the MSHCP regarding critical habitat designations within the MSHCP: "The USFWS acknowledged and agreed that the MSHCP and the Implementing Agreement (IA) provide a comprehensive, habitat-based approach to the protection of covered species by focusing on the lands essential for the long-term conservation of the covered species and appropriate management for those lands. This approach is consistent with the overall purposes of FESA to provide a means whereby the ecosystems upon which endangered and threatened species depend may be conserved. FESA regulations specify that the criteria to be used in designating critical habitat include "those physical and biological features that are essential to the conservation of a given species and that may require special management considerations or protection." (50 C.F.R. § 424.12(b). The MSHCP and the IA provide for the protection of "those physical and biological features essential to the conservation" of the covered species in a manner consistent with USFWS regulations concerning the designation of Critical Habitat. The USFWS agreed that in the event that a critical

Project	Section	Page	DEIR Language	SCE Recommended Language
				habitat determination is made for any covered species, and unless the USFWS finds that the MSHCP is not being implemented, lands within the boundaries of the MSHCP shall not be designated as critical habitat. In addition, if critical habitat is designated within the MSHCP boundaries, pursuant to Section 14.12 of the IA and except as expressly provided in Section 14.12 of the IA and Section 6.8 of the MSHCP regarding unforeseen circumstances, no subsequent evaluation of the covered species, nor any mitigation, compensation, conservation enhancement or other protective measures other than those set forth in the MSHCP shall be required. Although critical habitat is absorbed into the regional planning effort of the MSHCP and no additional mitigation is specifically required for ~~Impacts on~~ critical habitat, potential impacts to ~~for~~ these species would be minimized ~~reduced~~ through the standard implementation of Project Commitments B and D. ~~However, impacts from the construction and operation of the proposed Valley-Ivyglen Project would be significant~~. Implementation of MMs BR-1 through BR-9, which restrict construction to certain work areas, require worker environmental training, limit the amount of native vegetation that is disturbed during construction, restrict disturbance near active gnatcatcher nests, and require development of a restoration and revegetation plan, would ensure that ~~reduce~~ these impacts remain at ~~to~~ less than significant levels by reducing the amount of disturbance to critical habitat for these species and requiring that disturbed areas be restored post-construction."
Valley-Ivyglen	4.4.4.2	4.4-21	Line 11 under the heading Special Status Wildlife states: "Construction, operation, and maintenance of the proposed Valley–Ivyglen Project could impact the following wildlife species and their habitats: western spadefoot, SKR, Southern California rufous-crowned sparrow, burrowing owl, white-tailed kite, coastal California gnatcatcher, yellow warbler, Los Angeles pocket mouse, least Bell's vireo, San Diego black-tailed jackrabbit, coastal western whiptail, and orange-throated whiptail."	SCE suggests the following edits to the text and the referenced table. "Construction, operation, and maintenance of the proposed Valley–Ivyglen Project could impact the following wildlife species and their habitats: western spadefoot, SKR, Southern California rufous-crowned sparrow, burrowing owl, white-tailed kite, coastal California gnatcatcher, yellow warbler, Los Angeles pocket mouse, least Bell's vireo, southwestern willow flycatcher, San Diego black-tailed jackrabbit, coastal western whiptail, and orange-throated whiptail."

Project	Section	Page	DEIR Language	SCE Recommended Language
				Table 4.4-2 add "Southwestern Willow Flycatcher" and "P" under columns 4 and Section 7.

Table 4.4-2 Sensitive Plant and Wildlife Species and Critical Habitat Presence by Valley–Ivyglen Project Component

Species	Proposed Valley–Ivyglen 115-kV Subtransmission Line Segments							
	1	2	3	4	5	6	7	8
Western burrowing owl	P	---	---	---	---	---	---	---
Golden eagle	P	---	---	---	P	---	---	---
White-tailed kite	P	P	---	P	P	P	---	P
Yellow warbler	P	P	---	P	P	P	P	P
Southern California rufous-crowned sparrow	P	P	P	P	P	P	P	P
Swainson's hawk	P	---	---	P	---		P	
Stephens' kangaroo rat	P	---	---	P	P	---	P	---
Los Angeles pocket mouse	---	---	---	---	---	---	---	P
Black-tailed jackrabbit	P	---	---	P	P	---	---	---
Willow Flycatcher	P	---	---	---	P	---	P	---
Southwestern Willow Flycatcher	---	---	---	P	---	---	P	---
Peregrine Falcon	---	---	---	P	---	---	---	---

Sources: AMEC 2006a, 2006b, 2007, 2009a, 2009b, 2010, 2011a, 2011b, 2012a, 2012b, 2012c, 2013a, 2013b, 2013c, 2013d, 2014a, 2014b, 2014c, CNDDB 2015

Key:

P = Present

CHP = Critical Habitat Present

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.4.4.2	4.4-21	Wildlife Section	Please revise the name of the following reptile; Belding's Orange-throated whiptail **Table 4.4-2 Sensitive Plant and Wildlife Species and Critical Habitat Presence by Valley– Ivyglen Project Component** Proposed Valley–Ivyglen 115-kV Subtransmission Line Segments Species / 1 / 2 / 3 / 4 / 5 / 6 / 7 / 8 **Plants** Long-spined spineflower: P / --- / --- / --- / --- / --- / --- / --- Thread-leaved brodiaea: CHP / --- / --- / --- / --- / --- / --- / --- Paniculate tarplant: P / --- / --- / P / P / --- / P / --- Coulter's matilija poppy: --- / --- / --- / --- / --- / P / P / P Slender-horned spineflower: --- / --- / --- / --- / --- / --- / P / Robinson's pepper grass: --- / --- / --- / --- / P / P / P / --- Munz's onion: --- / --- / --- / P; CHP / --- / --- / P / --- San Diego ambrosia: --- / --- / --- / P / P; CHP / P / --- / --- Smooth tarplant: --- / --- / --- / P / --- / --- / --- / --- Chaparral sand verbena: --- / --- / --- / --- / --- / P / --- / P Coast live oak: --- / --- / --- / --- / --- / --- / P / P Coulter's goldfields: --- / --- / --- / P / --- / --- / --- / --- San Jacinto Valley crownscale: --- / --- / --- / P / --- / --- / --- / --- Small-flowered microseris: P / --- / --- / P / --- / --- / P / --- Small-flowered morning glory: P / --- / --- / P / P / --- / P / Roundleaf stork's bill: --- / --- / --- / P / --- / --- / --- / --- White rabbit tobacco: --- / --- / --- / --- / --- / --- / --- / P **Wildlife** Western spadefoot: P / --- / --- / --- / P / --- / --- / --- Belding's Orange-throated whiptail: P / P / --- / --- / P / P / P / P Coastal western whiptail: P / --- / --- / --- / --- / P / P / P Northern red-diamond rattlesnake: --- / --- / --- / --- / --- / --- / P / --- Coastal California gnatcatcher: P; CHP / P / CHP / --- / CHP / CHP / CHP / CHP Least Bell's vireo: P / P / --- / P / P / P / --- / P
Valley-Ivyglen	4.4.4.2	4.4-22	Line 13 under the heading Special Status Wildlife states: "The applicant is entering into an agreement with the RCA to allow for coverage of the proposed project under the MSHCP on Castle and Cooke property, which is outside MSHCP boundaries. Should this agreement not be finalized, MM BR-14 outlines options for take coverage or avoidance of impacts to special status species on Castle and Cooke property."	Please revise to reflect SCE's status as a PSE applicant and options for take coverage if SCE decides not to pursue take under the MSHCP as follows: "The applicant is ~~entering into an agreement~~ in the process of obtaining PSE status to allow for coverage of the proposed projects' entire alignments under the MSHCP ~~which is outside MSHCP boundaries~~. Should the Certificate of Inclusion not be finalized, MM BR-14 outlines options for take coverage or avoidance of impacts to special status species. ~~on Castle and Cooke property.~~"

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.4.4.2	4.4-23	Line 18 under heading Stephen's Kangaroo Rat states: "The majority of the project would be located within the SKR HCP area except for the central portion of Segment VIG5, which crosses private land."	Take would be authorized for the entire project even on C&C property. Note: C&C's litigation was over the MSHCP, not the SKR HCP. No additional SKR measures are required. SCE suggests the following edits: "The entire ~~majority of the~~ project would be located within the SKR HCP ~~area except for the central portion of Segment VIG5, which crosses private land~~."
Valley-Ivyglen	4.4.4.2	4.4-23	Line 28 under heading Stephen's Kangaroo Rat states: "To reduce impacts on SKR in areas where take is not authorized through the SKR HCP, the applicant will-implement Project Commitments B and D. The Project Commitments require an employee environmental-training program and development of a habitat restoration and revegetation plan. These measures will reduce the likelihood that SKR would be disturbed or killed or have its habitat removed. However, impacts to SKR in areas outside the SKR HCP would remain. Implementation of MM BR-1-through MM BR-4, MM BR-9, and MM BR-10 would reduce impacts to SKR to less than significant.-The mitigation measures would require the applicant to prevent the introduction and spread of invasive-plants and entrapment of wildlife, restore native vegetation communities disturbed by construction, and-use qualified biological monitors and preconstruction surveys to identify and relocate wildlife, including-SKR, from areas that would be disturbed by construction activities. These measures would further reduce-the likelihood that SKR are disturbed or killed during construction in areas outside the SKR HCP."	Take would be authorized for the entire project even on C&C property. Note: C&C's litigation was over the MSHCP, not the SKR HCP. Therefore, these 2 paragraphs are not applicable and should be deleted: ~~To reduce impacts on SKR in areas where take is not authorized through the SKR HCP, the applicant will implement Project Commitments B and D. The Project Commitments require an employee environmental training program and development of a habitat restoration and revegetation plan. These measures will reduce the likelihood that SKR would be disturbed or killed or have its habitat removed.~~ ~~However, impacts to SKR in areas outside the SKR HCP would remain. Implementation of MM BR 1 through MM BR 4, MM BR 9, and MM BR 10 would reduce impacts to SKR to less than significant. The mitigation measures would require the applicant to prevent the introduction and spread of invasive plants and entrapment of wildlife, restore native vegetation communities disturbed by construction, and use qualified biological monitors and preconstruction surveys to identify and relocate wildlife, including SKR, from areas that would be disturbed by construction activities. These measures would further reduce the likelihood that SKR are disturbed or killed during construction in areas outside the SKR HCP.~~

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.4.4.2	4.4-24	Line 11 under the heading Special Status Birds states: "In addition to common migratory species, several special status species could potentially be impacted by construction. These include Southern California rufous-crowned sparrow, least Bell's vireo, coastal California gnatcatcher, burrowing owl, white-tailed kite, and yellow warbler."	SCE suggests the following edits: "In addition to common migratory species, several special status species could potentially be impacted by construction. These include Southern California rufous-crowned sparrow, least Bell's vireo, southwestern willow flycatcher, coastal California gnatcatcher, burrowing owl, white-tailed kite, and yellow warbler."
Valley-Ivyglen	4.4.4.2	4.4-24	Line 29 under the heading Special Status Birds states: "Table 4.4-2 details where least Bell's vireo, coastal California gnatcatcher, and southwestern willow flycatchers as well as critical habitat have been observed along the Valley–Ivyglen Project."	Please update per the previous discussion on critical habitat as follows: "Table 4.4-2 details where least Bell's vireo, coastal California gnatcatcher, and southwestern willow flycatchers ~~as well as critical habitat~~ have been observed along the Valley–Ivyglen Project."
Alberhill/ Valley-Ivyglen	4.4.4.2	4.4-25	Line 14 under the heading Mitigation Measures states: "MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. Outside MSHCP boundaries, vehicular traffic (including movement of all equipment) shall be restricted to approved access roads and established construction areas shown in Figure 2.4 of the EIR. These areas shall be delineated in the field with flagging and signage. If disturbance is required outside the established construction areas, CPUC notification and approval shall be required. Sensitive resources such as waterbodies, oak trees, and special status plant populations shall be clearly marked for avoidance with flagging and signage. Nighttime lighting, if necessary adjacent to aquatic areas, shall be shielded away from these areas to prevent impacts on aquatic wildlife."	As previously noted, the entire project is located within the MSHCP boundaries. Also, this MM is applicable within the MSHCP. Recommend revising the language as follows: "MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. ~~Outside MSHCP boundaries, v~~Vehicular traffic (including movement of all equipment) shall be restricted to approved access roads and established construction areas shown in Figure 2.6 ~~2.4~~ of the EIR. These areas shall be delineated in the field with flagging and signage. If disturbance is required outside the established construction areas, CPUC notification and approval shall be required. Sensitive resources such as waterbodies, oak trees, and special status plant populations shall be clearly marked for avoidance with flagging and signage. Nighttime lighting, if necessary adjacent to aquatic areas, shall be shielded away from these areas to prevent impacts on aquatic wildlife."

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.4.4.2	4.4-25	Line 23 under the heading Mitigation Measures states: "MM BR-2: Preconstruction Surveys. Qualified biologists shall conduct preconstruction surveys no less than seven days prior to the start of construction in any given project construction area. Surveyors shall focus on areas proposed for vegetation removal or ground disturbance that are within habitat that a qualified biologist has deemed suitable for sensitive species. As part of preconstruction surveys, the composition of the vegetation community shall be surveyed to establish baseline conditions prior to construction and to guide post-construction restoration efforts. The surveys shall be conducted to determine the presence of special status plants, noxious weeds, and all wildlife species for the purpose of preventing direct loss of vegetation and wildlife and the spread of noxious plant species. Preconstruction surveys shall be performed for each discrete work area prior to the start of ground disturbance, or if work has lapsed for longer than one week. Biologists shall document survey results in a daily logbook."	All surveys required by the MSHCP have been completed except for a preconstruction burrowing owl survey, which will be completed within 30 days prior to construction. Vegetation mapping has also been completed and will inform the development of the Habitat Restoration and Revegetation Plan. Suggest revising the MM language as follows: "MM BR-2: Preconstruction Surveys. Qualified biologists shall conduct preconstruction surveys for burrowing owl and other sensitive species no more ~~less~~ than ~~seven~~ 30 days prior to the start of construction ~~in any given project construction area~~. Surveyors shall focus on areas proposed for vegetation removal or ground disturbance that are within habitat that a qualified biologist has deemed suitable for sensitive species. ~~As part of preconstruction surveys, the composition of the vegetation community shall be surveyed to establish baseline conditions prior to construction and to guide post-construction restoration efforts.~~ The surveys shall be conducted to relocate and flag for avoidance known ~~determine the presence of~~ special status plants, noxious weeds, and all wildlife species for the purpose of preventing direct loss of vegetation and wildlife and the spread of noxious plant species. Preconstruction surveys shall be performed for each discrete work area prior to the start of ground disturbance, or if work has lapsed for longer than three months ~~one week~~. Biologists shall document survey results in a daily logbook or report."
Alberhill/ Valley-Ivyglen	Section 4.4.4.2	4.4-25	Line 34 under the heading Mitigation Measures states: "MM BR-3: Biological Monitoring During Construction. In areas where sensitive resources may be impacted by construction activities, a qualified biological monitor shall be present during construction activities. The monitor shall have the authority to temporarily stop work that he or she determines to be threatening to a special status wildlife or plant species. The monitor shall determine appropriate action, and work will resume once the monitor determines there is no longer a threat to the special status	MM BR-2 and MM BR-3 appear to combine the preconstruction surveys, nest surveys and construction monitoring sweep efforts. Suggest clarifying the MM as follows: "MM BR-3: Biological Monitoring During Construction. In areas where sensitive resources may be impacted by construction activities, a qualified biological monitor shall be present during construction activities. Prior to initiation of vegetation clearing or ground disturbing activities in sensitive habitat, on a daily basis, the monitor will survey the work area for sensitive species and flag biological resources for avoidance during construction. The

Project	Section	Page	DEIR Language	SCE Recommended Language
			species or approval has been obtained from the appropriate wildlife agencies or CPUC."	monitor shall have the authority to temporarily stop work that he or she determines to be threatening to a special status wildlife or plant species or nesting bird. The monitor shall determine appropriate action, and work will resume once the monitor determines there is no longer a threat to the special status species or approval has been obtained from the appropriate wildlife agencies or CPUC. Biologists shall document survey results in a daily logbook."
Alberhill/ Valley-Ivyglen	Section 4.4.4.2	4.4-25	Line 41 under the heading Mitigation Measures states: "MM BR-4: Limit Removal of Native Vegetation Communities and Trees. For project areas located outside the MSHCP boundaries, the removal of native vegetation and trees shall be limited to the minimum practicable area required for construction of the project. Grading, grubbing, graveling, or paving shall only occur for permanent project components. The applicant shall use temporary staging areas in a way that facilitates post-construction restoration."	As previously noted, the entire project is located within the MSHCP boundaries. Also, this MM is applicable within the MSHCP. SCE suggests revising the language as follows: "MM BR-4: Limit Removal of Native Vegetation Communities and Trees. ~~For project areas located outside the MSHCP boundaries, t~~The removal of native vegetation and trees shall be limited to the minimum practicable area required for construction of the project. Grading, grubbing, graveling, or paving shall only occur where required for construction and operations ~~for permanent project components~~. The applicant shall restore temporary staging areas to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner ~~use temporary staging areas in a way that facilitates post-construction restoration~~."
Alberhill/ Valley-Ivyglen	4.4.4.2u	4.4-25	Line 47 Under the heading Mitigation Measures states: "MM BR-5: California gnatcatcher protection measures. A qualified biologist shall conduct preconstruction surveys no more than seven days prior to removal of Riversidean sage scrub habitat during the coastal California gnatcatcher breeding season (15 February through 15 August). Should nesting coastal California gnatcatcher be observed during preconstruction surveys, vegetation removal and other construction-related disturbance shall not commence within the applicable nest buffer area, as identified in the projects' Nesting Bird Management Plan, until the nest is determined to be inactive."	Suggest revising the MM to be consistent with MSHCP requirements as follows: "MM BR-5: California gnatcatcher protection measures. In accordance with the MSHCP, removal of occupied coastal California gnatcatcher habitat on Public/Quasi-Public lands and within the MSHCP criteria area will occur outside of the breeding season, which is defined by the MSHCP as 1 March through 31 August. ~~A qualified biologist shall conduct preconstruction surveys no more than seven days prior to removal of Riversidean sage scrub habitat during the coastal California gnatcatcher breeding season (15 February through 15 August). Should nesting coastal California gnatcatcher be observed during~~

Project	Section	Page	DEIR Language	SCE Recommended Language
				~~preconstruction surveys, vegetation removal and other construction-related disturbance shall not commence within the applicable nest buffer area, as identified in the projects' Nesting Bird Management Plan, until the nest is determined to be inactive.~~"
Alberhill/ Valley-Ivyglen	4.4.4.2	4.4-27	Line 4 under the heading Mitigation Measures states: "MM BR-8: Special Status Plant Avoidance and Mitigation Measures. For project areas located outside MSHCP boundaries, the applicant shall avoid the special status plant populations listed in Appendix G, Table 1. However, where avoidance is not feasible, special status plants in project work areas shall be identified in the field, and the following avoidance measures shall be implemented to minimize the possibility of inadvertent encroachment: • A qualified biologist shall flag or otherwise mark special status plants. Construction crews will avoid direct or indirect impacts on these flagged areas. Should impacts on special status plants be unavoidable, the applicant will implement the following measures: - A qualified botanist shall determine if transplantation is feasible. If determined feasible, a qualified botanist shall develop and implement a transplantation plan in coordination with appropriate agencies (CDFW, RCA). The special status plant transplantation plan shall identify a suitable transplant site, moving the plant material and seed bank to the transplant site, collecting seed material and propagating it in a nursery, and monitoring the transplant sites to document recruitment and survival rates. - If transplantation is infeasible, the applicant shall replace impacted special status plants at a 2:1 ratio within the project area within one year of the end of construction. Measures to restore special status plants shall be implemented in accordance with the	There are no project areas located outside MSHCP boundaries. SCE will follow requirements under the MSHCP regarding special status plants. Because there are no permanent impacts on MSHCP covered plants, a DBESP describing additional mitigation (including transplantation and offsite mitigation) is not required. This will be confirmed by receipt of the MSHCP COI. Although some impacts to paniculate tarplant (CNPS Rank 4, not Covered by the MSHCP) are anticipated, this species is widespread throughout the area and re-establishes after disturbance. As such, mitigation would include topsoil salvage and replacement only within the same area of disturbance, as described in the forthcoming HRRP. No additional measures for this species would be required. Therefore, the applicant recommends deleting this MM. ~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures. For project areas located outside MSHCP boundaries, the applicant shall avoid the special status plant populations listed in Appendix G, Table 1. However, where avoidance is not feasible, special status plants in project work areas shall be identified in the field, and the following avoidance measures shall be implemented to minimize the possibility of inadvertent encroachment:~~ ~~A qualified biologist shall flag or otherwise mark special status plants. Construction crews will avoid direct or indirect impacts on these flagged areas. Should impacts on special status plants be unavoidable, the applicant will implement the following measures:~~ ~~A qualified botanist shall determine if transplantation is feasible. If determined feasible, a qualified botanist shall~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			Habitat Restoration and Revegetation Plan (MM BR-7)."	~~develop and implement a transplantation plan in coordination with appropriate agencies (CDFW, RCA). The special status plant transplantation plan shall identify a suitable transplant site, moving the plant material and seed bank to the transplant site, collecting seed material and propagating it in a nursery, and monitoring the transplant sites to document recruitment and survival rates.~~ ~~If transplantation is infeasible, the applicant shall replace impacted special status plants at a 2:1 ratio within the project area within one year of the end of construction. Measures to restore special status plants shall be implemented in accordance with the Habitat Restoration and Revegetation Plan (MM BR-7).~~
Alberhill/ Valley-Ivyglen	4.4.4.2	4.4-27	Line 24 under the heading Mitigation Measures states: "MM BR-9: Invasive Plant Control Measures. The applicant shall develop an Invasive Plant Management Plan outlining measures to prevent the spread of invasive plants such as tamarisk (Tamarix sp.) and giant reed (Arundo donax) during construction of the projects. The Invasive Plant Management Plan shall include, but is not limited to, the following measures: • All vehicles and equipment shall be cleaned prior to arrival at the work site. • Straw or hay bales used for sediment barrier installations or mulch distribution shall be obtained from weed-free sources."	Cleaning should be limited to off road equipment, not personal or construction vehicles. Once equipment is washed, no further washing should be required until the equipment is removed from the weed zone. SCE suggests the following edits: "MM BR-9: Invasive Plant Control Measures. The applicant shall develop an Invasive Plant Management Plan outlining measures to prevent the spread of invasive plants such as tamarisk (Tamarix sp.) and giant reed (Arundo donax) during construction of the projects. The Invasive Plant Management Plan shall include, but is not limited to, the following measures: • Off Road ~~All vehicles and~~ equipment shall be cleaned prior to arrival at the work site or after the equipment has worked outside of the weed zone. • If s~~S~~traw or hay bales are used for sediment barrier installations or mulch distribution shall be obtained from weed-free sources."

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	Section 4.4.4.2	4.4-28	Line 1 under the heading Mitigation Measures states: "MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. The applicant shall develop a Nesting Bird Management Plan in consultation with the USFWS and CDFW that outlines protective measures and BMPs that shall be employed in all project work areas to prevent disturbance of active nests. The final Plan shall be submitted to the CPUC for approval. The Nesting Bird Management Plan shall include the following components: species-specific buffer distances (including vertical buffers in areas where helicopters will be used) and conditions under which these buffer distances can be reduced, including concurrence by the CDFW, USFWS, and CPUC for special status species; dates of local breeding seasons during which nest surveys shall be conducted; preconstruction nest survey timing, methods, and surveyor qualifications; nest deterrent methods, including vegetation clearing; monitoring and reporting protocols during construction; protocols for determining whether a nest is active; protocols for documenting, reporting, and protecting active nests within construction areas; and avian monitor qualifications. If preconstruction survey protocols exist for a certain species, the Nesting Bird Management Plan shall incorporate these protocols. The survey area shall include the construction area, plus an additional distance large enough to accommodate the protective buffer of bird species likely to occur in proximity to the construction area. The Nesting Bird Management Plan shall further specify that active bird nests shall not be removed during breeding season unless the projects are expressly permitted to do so by the USFWS or CDFW; all project-related nest failures shall be reported to the USFWS and CDFW on a monthly basis; and the biological monitor shall halt work if he or she determines that active nests would be disturbed by construction activities. If construction begins during the breeding season (February 1 through August 31), the Nesting Bird Management Plan shall be submitted to the USFWS and CDFW for review and comment no less than six months prior to the start of construction, with the	The applicant has coordinated extensively with the CDFW, USFWS, and CPUC regarding the management of nesting birds during construction projects. The NBMP will be based on a previous approved plan developed through a Nesting Bird Technical Group formed for the West of Devers Project in 2015 that included USFWS and CDFW. The intent of this technical group was to streamline agency coordination on future Plans. Therefore SCE suggests the following edits: "MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. The applicant shall develop a Nesting Bird Management Plan in consultation with the USFWS and CDFW that outlines protective measures and BMPs that shall be employed in all project work areas to prevent disturbance of active nests. The final Plan shall be submitted to the CPUC for approval. The Nesting Bird Management Plan shall include the following components: species-specific buffer distances (including vertical buffers in areas where helicopters will be used) and conditions under which these buffer distances can be reduced, including concurrence by the CDFW, USFWS, and CPUC for special status species; dates of local breeding seasons during which nest surveys shall be conducted; preconstruction nest survey timing, methods, and surveyor qualifications; nest deterrent methods, including vegetation clearing; monitoring and reporting protocols during construction; protocols for determining whether a nest is active; protocols for documenting, reporting, and protecting active nests within construction areas; and avian monitor qualifications. If preconstruction survey protocols exist for a certain species, the Nesting Bird Management Plan shall incorporate these protocols. The survey area shall include the construction area, plus an additional distance large enough to accommodate the protective buffer of bird species likely to occur in proximity to the construction area. The Nesting Bird Management Plan shall further specify that active bird nests shall not be removed during breeding season unless the projects are expressly permitted to do so by the

Project	Section	Page	DEIR Language	SCE Recommended Language
			intent that the plan will be finalized no less than two months prior to the start of construction. A copy of the final Nesting Bird Management Plan, along with documentation of agency review (CDFW, USFWS, CPUC) and incorporation of comments into the final version, shall be provided to the CPUC for approval prior to the CPUC issuing a notice to proceed during the breeding season."	USFWS or CDFW; all project-related nest failures shall be reported to the USFWS and CDFW on a monthly basis; and the biological monitor shall halt work if he or she determines that active nests would be disturbed by construction activities. If construction begins during the breeding season (February 1 through August 31), the Nesting Bird Management Plan shall be submitted to the USFWS and CDFW for review and comment no less than ~~six~~ two months prior to the start of construction, with the intent that the plan will be finalized no less than ~~two~~ one month~~s~~ prior to the start of construction. A copy of the final Nesting Bird Management Plan, along with documentation of agency review (CDFW, USFWS, CPUC) and incorporation of comments into the final version, shall be provided to the CPUC for approval prior to the CPUC issuing a notice to proceed during the breeding season."
Alberhill/ Valley-Ivyglen	Section 4.4.4.2	4.4-28	Line 29 under the heading Mitigation Measures states: "MM BR-12: Burrowing Owl Impact Reduction Measures. To reduce impacts on burrowing owls, the applicant shall implement the following measures in all project work areas: • Surveys for burrowing owls will be conducted by a qualified biologist within 30 days of construction during the non-breeding season and within 14 days of construction during the breeding season (February 1 through August 31) to confirm whether burrowing owls occupy the site. Surveys shall be performed throughout the project areas that contain suitable burrowing owl habitat, with a potential to be impacted by construction activities, plus an additional area extending 300 feet from the projects' boundaries. • If an occupied burrow is identified, the applicant shall adhere to buffer distances detailed in the Staff Report on Burrowing Owl Mitigation (CDFG 2012).	Please update the MM to be consistent with MSHCP requirements as follows: "MM BR-12: Burrowing Owl Impact Reduction Measures. To reduce impacts on burrowing owls, the applicant shall implement the following measures in all project work areas: • Surveys for burrowing owls will be conducted by a qualified biologist within 30 days of construction during the non-breeding season and within 14 days of construction during the breeding season (February 1 through August 31) to confirm whether burrowing owls occupy the site. Surveys shall be performed throughout the project areas that contain suitable burrowing owl habitat, with a potential to be impacted by construction activities, plus an additional area extending 300 feet from the projects' boundaries. • If an occupied burrow is identified, the applicant shall use the ~~adhere to~~ buffer distances detailed in the Staff Report on Burrowing Owl Mitigation (CDFW~~CDFG~~ 2012) as guidance. To avoid direct and indirect impacts

Project	Section	Page	DEIR Language	SCE Recommended Language
			• The biologist will report all project-related impacts on burrowing owl to the appropriate resource agencies (CDFW and RCA, depending on the location of the impact). • If impacts on burrowing owls or occupied burrows are unavoidable, the applicant shall develop and implement a Burrowing Owl Compensation Plan in consultation with the CDFW and RCA that is consistent with mitigation guidelines as outlined in the Staff Report on Burrowing Owl Mitigation (CDFG 2012) or MSHCP guidelines for burrowing owl mitigation and compensation, as appropriate. The Burrowing Owl Compensation Plan shall describe the compensatory measures that will be undertaken to address the loss of burrowing owl burrows within the project area. The compensatory mitigation shall include mitigation for permanent impacts on nesting, occupied, and satellite burrows and occupied burrowing owl habitat by permanent conservation of vegetation communities comparable to or better than the impacted area on sufficiently large acreage containing fossorial mammals."	to active nests, all occupied burrows will be flagged and construction buffers established in cooperation with CDFW, generally described as follows. ○ 160 feet from occupied burrows during non-nesting season ○ 500 feet from occupied burrows during the nesting season (February 1 through August 31). Should this buffer not be able to be maintained, the closest distance allowable will be 300 feet, and the qualified biologist shall monitor the owls for signs of stress and/or other behavioral changes to determine if construction should be halted and discussions initiated with CDFW on an appropriate course of action. • The biologist will report all project-related impacts on burrowing owl to the appropriate resource agencies (CDFW and RCA~~, depending on the location of the impact~~). • If the appropriate buffers cannot be maintained and impacts on the burrowing owl and/or their habitat (i.e., ~~owls or~~ occupied burrows) are unavoidable, the applicant will ~~shall~~ develop and implement a DBESP in compliance with MSHCP Section 6.3.2 ~~Burrowing Owl Compensation Plan~~, as approved by ~~in consultation with~~ the CDFW and RCA, ~~that is consistent with mitigation guidelines as outlined in the Staff Report on Burrowing Owl Mitigation (CDFG 2012)~~, The DBESP will ~~guidelines for burrowing owl mitigation and compensation, as appropriate. The Burrowing Owl Compensation Plan shall~~ describe the compensatory measures that will be undertaken to address the loss of burrowing owl burrows within the project area. Compensatory measures will be

Project	Section	Page	DEIR Language	SCE Recommended Language
				determined based on a site-specific analysis but may ~~The compensatory mitigation shall~~ include restoration of temporarily impacted habitat and acquisition and/or enhancement of off-site mitigation lands as determined in consultation with the CDFW. If avoidance of ~~mitigation for permanent impacts on nesting, occupied, and satellite~~ burrows cannot be maintained, on-site passive relocation of owls is preferred over active relocation. To compensate for loss of burrows, the Applicant will provide two alternate natural (enlarged or cleared of debris) or artificial burrows in nearby contiguous foraging habitat for each ~~and occupied burrowing~~ owl displaced within the project area. Prior to collapsing burrows vacated through passive relocation, burrow excluders should be placed over the burrow not less ~~habitat by permanent conservation of vegetation communities comparable to or better~~ than 48 hours prior to the collapse. On the day of the exclusion, the burrows shall be checked using a video camera probe. The Applicant's biological monitor will conduct daily monitoring for a two-week period to check on burrowing owl use of the alternate burrows. ~~the impacted area on sufficiently large acreage containing fossorial mammals.~~
Alberhill/ Valley-Ivyglen	Section 4.4.4.2	4.4-29	Line 7 under the heading Mitigation Measures states: "MM BR-14: Protection of Special Status Species on Castle and Cooke Land. The applicant is entering into an agreement with the RCA to allow for coverage of the Valley–Ivyglen and Alberhill Projects' obligations under the MSHCP on Castle and Cooke property, which falls outside MSHCP boundaries and thus is exempt from mitigation under the MSHCP. If this agreement is finalized prior to the start of construction, it shall be in effect for the duration of the projects or until SCE opts out. Should SCE opt out of the MSHCP, or if this agreement with the RCA is not finalized, the applicant shall implement the same or a greater level of species-specific avoidance, mitigation, restoration, and	Per previous comments, only C&C parcels listed in the settlement agreement area exempt from MSHCP requirements. SCE suggests revising this MM as follows: "MM BR-14: Protection of Special Status Species without the MSHCP ~~on Castle and Cooke Land~~. The applicant is obtaining PSE status through issuance of a Certificate of Inclusion (COI) from ~~entering into an agreement with~~ the RCA, with USFWS and CDFW concurrence to allow for MSHCP coverage over ~~of~~ the entire alignments of the Valley–Ivyglen and Alberhill Projects.~~'~~ ~~obligations under the MSHCP. on Castle and Cooke property which falls outside MSHCP boundaries and thus is exempt from mitigation under the MSHCP~~. If this COI ~~agreement~~ is finalized

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td></td><td></td><td></td><td>compensation measures as would have been required under the MSHCP. These additional measures would include MM BR-1, MM BR-4, and MM BR-8.”</td><td>prior to the start of construction, it shall be in effect for the duration of the project~~s or until SCE opts out~~. Should SCE opt out of the MSHCP, or if this agreement with the RCA is not finalized, the applicant shall implement the same or a greater level of species-specific avoidance, mitigation, restoration, and compensation measures as would have been required under the MSHCP. <u>This may also include additional consultation with USFWS and CDFW to obtain Incidental Take Authorization pursuant to the Federal and California Endangered Species Acts. Implementation of</u> ~~These~~ additional measures would <u>also</u> include MM BR-1<u>,</u> and MM BR-4, ~~and MM BR-8.~~”</td></tr>
<tr><td>Valley-Ivyglen</td><td>4.4.4.2</td><td>4.4-29</td><td>Footnotes on Table 4.4-3 state:

Table 4.4-3 CNDDB Sensitive Vegetation Communities along Components of the Valley–Ivyglen Project (in acres)
<table><tr><th>Vegetation Community</th><th colspan="9">Valley-Ivyglen 115-kV Segment</th></tr><tr><th></th><th>1</th><th>2</th><th>3</th><th>4</th><th>5</th><th>6</th><th>7</th><th>8</th><th>Total</th></tr><tr><td>Chamise Chaparral</td><td>---</td><td>---</td><td>---</td><td>---</td><td>4.69</td><td>31.94</td><td>0.61</td><td>---</td><td>37.24</td></tr><tr><td>Coast Live Oak Woodland</td><td>---</td><td>---</td><td>---</td><td>---</td><td>---</td><td>0.06</td><td>1.01</td><td>1.24</td><td>2.31</td></tr><tr><td>Riversidean Sage Scrub[2]</td><td>100.40</td><td>21.07</td><td>0.11</td><td>0.28</td><td>47.13</td><td>133.05</td><td>22.39</td><td>7.49</td><td>331.92</td></tr><tr><td>Southern Cottonwood-Willow Riparian Woodland[1]</td><td>.79</td><td>---</td><td>---</td><td>2.38</td><td>7.47</td><td>9.34</td><td>---</td><td>---</td><td>19.98</td></tr><tr><td>Southern Sycamore-Alder Riparian Woodland[1]</td><td>---</td><td>---</td><td>---</td><td>---</td><td>---</td><td>---</td><td>---</td><td>0.34</td><td>0.34</td></tr></table>Source: SCE 2013a, 2014a
[1] CNDDB sensitive community is entitled “California sycamore woodland”
[2] Riversidean sage scrub is a type of coastal sage scrub (Holland 1986), which is part of sensitive natural community alliances according to CNDDB; coastal sage scrub is also a sensitive community under the MSHCP.

Source: SCE 2013a, 2014a
1 CNDDB sensitive community is entitled “California sycamore woodland”
2 Riversidean sage scrub is a type of coastal sage scrub (Holland 1986), which is part of sensitive natural community alliances according to CNDDB; coastal sage scrub is also a sensitive community under the MSHCP.</td><td>Please add a footnote to Table 4.4-3 as follows:

Source: SCE 2013a, 2014a
1 CNDDB sensitive community is entitled “California sycamore woodland”
2 Riversidean sage scrub is a type of coastal sage scrub (Holland 1986), which is part of sensitive natural community alliances according to CNDDB; coastal sage scrub is also a sensitive community under the MSHCP.
<u>3 Acreages provided in this table include total vegetation communities present within the project study area, not acres to be impacted. Based on final engineering and construction details, potential impacts to vegetation communities will be substantially less than acreages provided.</u></td></tr>
</table>

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.4.4.2	4.4-31	Line 4 under the heading Mitigation Measures Impact BR-3 (VIG) states: "The applicant anticipates that approximately 0.37 acres of wetlands under the jurisdiction of USACE and 0.89 acres under the jurisdiction of the CDFW would be permanently impacted by construction (Appendix G, Table 3). Segment VIG8 would permanently impact less than 0.1 acres of jurisdictional waters."	For consistency with Appendix G, SCE suggests the following edits. "The applicant anticipates that approximately ~~0.37~~ 0.46 acre~~s~~ of ~~wetlands~~ waters under the jurisdiction of USACE and ~~0.89~~ 10.41 acre~~s~~ under the jurisdiction of the CDFW would be permanently impacted by construction (Appendix G, Table 3). Segment VIG8 would permanently impact less than 0.1 acre~~s~~ of jurisdictional waters."
Valley-Ivyglen	4.4.4.2	4.4-31	Line 23 under heading Mitigation Measures, Impact BR-3 (VIG) states: "MM BR-15 would control erosion, sedimentation, and input of pollutants."	SCE suggests the following edits: "~~MM BR-15~~ Best Management Practices (BMPs) would control erosion, sedimentation, and input of pollutants."
Valley-Ivyglen	4.4.4.2	4.4-31	Line 43 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs). BMPs to be included in the SWPPP shall include, but are not limited to, the following: The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats. If visible dust is present during construction activities, standard dust suppression techniques (e.g., water spraying) shall be used in all ground disturbance areas. During construction activities, measures shall be in place to ensure that contaminants are not discharged from construction sites. The SWPPP shall define areas where hazardous materials and trash will be stored; vehicles will be parked, fueled, and serviced; and construction materials will be stored. Runoff, sedimentation, and erosion shall be minimized through the use of water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures shall be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or	This is a regulatory requirement not a mitigation measures. Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is required. Refer to the first paragraph on DEIR page 4.9-9. Suggest deleting this measure. ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs). BMPs to be included in the SWPPP shall include, but are not limited to, the following~~: ~~The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats.~~ ~~If visible dust is present during construction activities, standard dust suppression techniques (e.g., water spraying) shall be used in all ground disturbance areas.~~ ~~During construction activities, measures shall be in place to ensure that contaminants are not discharged from construction sites. The SWPPP shall define areas where hazardous materials and trash will be stored; vehicles will be parked, fueled, and serviced; and construction materials will be stored.~~ ~~Runoff, sedimentation, and erosion shall be minimized through the use of water bars, silt fences, staked straw bales, wattles, and~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			bodies of water, and to preserve roadways and adjacent properties. BMPs shall be included for helicopter landing, fueling, and servicing areas and areas where helicopters are used for construction activities. For the proposed Valley–Ivyglen Project, BMPs shall also be included for blasting. Equipment storage, fueling, and staging areas shall be located in upland sites away from riparian areas or other sensitive habitats. These designated areas shall be located to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously identified, these maintenance activities shall be performed at least 150 feet from all aquatic resources, or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials shall be cleaned up immediately and contaminated soils removed to approved disposal areas. Verification of Construction General Permit coverage approval and the approved SWPPP(s) shall be provided to the CPUC at least 30 days prior to start of construction. Updated SWPPPs shall be provided to the CPUC on request during construction.	~~mulching and seeding of all disturbed areas. These measures shall be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent properties. BMPs shall be included for helicopter landing, fueling, and servicing areas and areas where helicopters are used for construction activities. For the proposed Valley–Ivyglen Project, BMPs shall also be included for blasting.~~ ~~Equipment storage, fueling, and staging areas shall be located in upland sites away from riparian areas or other sensitive habitats. These designated areas shall be located to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously identified, these maintenance activities shall be performed at least 150 feet from all aquatic resources, or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials shall be cleaned up immediately and contaminated soils removed to approve disposal areas.~~ ~~Verification of Construction General Permit coverage approval and the approved SWPPP(s) shall be provided to the CPUC at least 30 days prior to start of construction. Updated SWPPPs shall be provided to the CPUC on request during construction.~~
Valley-Ivyglen	4.4.4.2	4.4-33	Line 28 under the heading Mitigation Measures Impact BR-6 (VIG) states: "The entirety of the proposed Valley–Ivyglen 115-kV subtransmission line is located within the plan areas of the MSHCP and SKR HCP (Figure 4.4-1), with the exception of the center portion of Segment VIG5, which is located on private land. Unlike the MSHCP, the SKR HCP does not include a PSE provision in which applicants may streamline the take permitting process. The applicant was required to pursue an alternative mechanism for obtaining SKR take authorization for both	SCE suggests the following revisions to provide clarity on C&C exemption from MSHCP requirements on some parcels but no exemption from the SKR HCP. In addition, these edits remove unnecessary language related to the relationship between SKR core reserve areas and MSHCP ARL versus PQP land per applicant's previous comment. "The entirety of the proposed Valley–Ivyglen 115-kV subtransmission line is located within the plan areas of the MSHCP and SKR HCP (Figure 4.4-1)~~, with the exception of the center portion of Segment VIG5, which is located on private land~~.

Project	Section	Page	DEIR Language	SCE Recommended Language
			proposed projects. The applicant worked with the RCHCA to amend the SKR HCP to allow the applicant to obtain SKR incidental take authorization within SKR HCP areas for both the Alberhill and Valley–Ivyglen projects. As of October 15, 2012 the applicant finalized an SKR HCP Implementation Agreement with the RCHCA, which provides a process through which the applicant may obtain take authorization of SKR pursuant to the SKR HCP (AMEC 2014a). The Implementation Agreement also applies to work within MSHCP areas identified as ARL because SKR HCP core reserve requirements do not apply to ARL (Figure 4.4-1). The Implementation Agreement also allows the applicant to obtain take for SKR on lands owned by Castle and Cooke. As of June, 2015, the RCHCA is processing a COI to formalize this take agreement and identify the applicant as a participant in the SKR HCP for both the Valley–Ivyglen and Alberhill Projects. The COIs will be finalized prior to construction and will be included in the Notice to Proceed request for each project."	Unlike the MSHCP, the SKR HCP does not include a PSE provision in which applicants may streamline the take permitting process. The applicant was required to pursue an alternative mechanism for obtaining SKR take authorization for both proposed projects. The applicant worked with the RCHCA to amend the SKR HCP to allow the applicant to obtain SKR incidental take authorization within SKR HCP areas for both the Alberhill and Valley–Ivyglen projects. As of October 15, 2012 the applicant finalized an SKR HCP Implementation Agreement with the RCHCA, which provides a process through which the applicant may obtain take authorization of SKR pursuant to the SKR HCP (AMEC 2014a). ~~The Implementation Agreement also applies to work within MSHCP areas identified as ARL because SKR HCP core reserve requirements do not apply to ARL (Figure 4.4-1).~~ The Implementation Agreement also allows the applicant to obtain take for SKR on lands owned by Castle and Cooke. As of June, 2015, the RCHCA is processing a COI to formalize this take agreement and identify the applicant as a participant in the SKR HCP for both the Valley–Ivyglen and Alberhill Projects. The COIs will be finalized prior to construction and will be included in the Notice to Proceed request for each project. Also suggest adding this paragraph just before the last paragraph in this section providing an update on the PSE application processes. The applicant obtained a COI from RCA for Phase 1 of the VIG project. A PSE application for Phase 2 of the VIG project was submitted to RCA in March 2016. A PSE application for Alberhill will be submitted in 2016 or 2017."
Valley-Ivyglen	4.4.4.2	4.4-34	Line 11 under heading Mitigation Measures Impact BR-6 (VIG) states: "MSHCP critical habitat and protected species, the SKR HCP, and impacts on SKR are further discussed under Impact BR-1 (VIG)."	SCE suggests the following edits: MSHCP ~~critical habitat and~~ protected species, the SKR HCP, and impacts on SKR are further discussed under Impact BR-1 (VIG).

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	4.4.5.2	4.4-35	Line 11 under heading Mitigation Measures Impact BR-1 (ASP) states: "The applicant is entering into an agreement with the RCA to allow for coverage of the proposed Valley–Ivyglen and Alberhill projects under the MSHCP on Castle and Cooke property, which is outside MSHCP boundaries. Should this agreement not be finalized, MM BR-14 outlines options for take coverage or avoidance of impacts to special status species on Castle and Cooke property."	SCE suggests revising the status of C& C exemption form MSHCP requirements as follows: "~~The applicant is entering into an agreement with the RCA to allow for coverage of the proposed Valley–Ivyglen and Alberhill projects under the MSHCP on Castle and Cooke property, which is outside MSHCP boundaries. Should this agreement not be finalized, MM BR-14 outlines options for take coverage or avoidance of impacts to special status species on Castle and Cooke property.~~ The applicant is obtaining PSE status through issuance of a Certificate of Inclusion (COI) from the RCA, with USFWS and CDFW concurrence, to allow for MSHCP coverage over the entire alignments of the Valley–Ivyglen and Alberhill Projects. Should the COI not be finalized, MM BR-14 outlines options for take coverage or avoidance of impacts to special status species."
Alberhill	4.4.5.2	4.4-35	Line 32 under Mitigation Measures Impact BR-1 (ASP) states: "Overall, construction and operation of the proposed Alberhill Project could negatively impact individuals of the following special status wildlife species and their habitats: Quino checkerspot butterfly, vernal pool fairy shrimp, Riverside fairy shrimp, orange-throated whiptail, western spadefoot, coastal California gnatcatcher, least Bell's vireo, western burrowing owl, golden eagle, San Bernardino kangaroo rat, and SKR (Table 4.4-4)."	SCE suggests the following edits to include an additional species: "Overall, construction and operation of the proposed Alberhill Project could negatively impact individuals of the following special status wildlife species and their habitats: Quino checkerspot butterfly, vernal pool fairy shrimp, Riverside fairy shrimp, orange-throated whiptail, western spadefoot, coastal California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, western burrowing owl, golden eagle, San Bernardino kangaroo rat, and SKR (Table 4.4-4)."
Alberhill	4.4.5.2	4.4-37	Line 25 under heading Critical Habitat for Coastal California Gnatcatcher, Munz's Onion, and San Diego Ambrosia states: "Impacts on critical habitat for these species would be reduced with the implementation of Project Commitments B and D, which require a worker environmental awareness program and a habitat restoration and revegetation plan; however, impacts would still be significant. MMs BR-1 through BR-4 and MM BR-7 through MM BR-9 restrict construction to certain work areas, require	SCE suggests the following edits: "~~Impacts on critical habitat for these species would be reduced with the implementation of Project Commitments B and D, which require a worker environmental awareness program and a habitat restoration and revegetation plan; however, impacts would still be significant. MMs BR-1 through BR-4 and MM BR-7 through MM BR-9 restrict construction to certain work areas, require preconstruction surveys, require biological~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			preconstruction surveys, require biological monitoring, limit the amount of native vegetation that is disturbed during construction, require development of a Habitat Restoration and Revegetation Plan, required avoidance of special status plant species, and help reduce the spread of invasive species. Within MSHCP boundaries, these impacts would be reduced to less than significant through MSHCP-specific mitigation measures and BMPs (Appendix H)."	~~monitoring, limit the amount of native vegetation that is disturbed during construction, require development of a Habitat Restoration and Revegetation Plan, required avoidance of special status plant species, and help reduce the spread of invasive species. Within MSHCP boundaries, these impacts would be reduced to less than significant through MSHCP-specific mitigation measures and BMPs (Appendix H).~~ As mentioned above, the USFWS acknowledged and agreed that the MSHCP and the Implementing Agreement (IA) provide a comprehensive, habitat-based approach to the protection of covered species by focusing on the lands essential for the long-term conservation of the covered species and appropriate management for those lands. The MSHCP and the IA provide for the protection of the covered species in a manner consistent with USFWS regulations concerning the designation of Critical Habitat. Although critical habitat is absorbed into the regional planning effort of the MSHCP and no additional mitigation is specifically required for critical habitat, potential impacts to these species would be minimized through the standard implementation of Project Commitments B and D. MMs BR-1 through BR-9 would be implemented which restrict construction to certain work areas, require worker environmental training, limit the amount of native vegetation that is disturbed during construction, restrict disturbance near active gnatcatcher nests, help reduce the spread of invasive species, and require development of a Habitat Restoration and Revegetation Plan. Through these and other MSHCP-specific BMPs (Appendix H) impacts would remain at less than significant levels."
Alberhill	4.4.5.2	4.4-39	Line 21 under the heading Stephen's Kangaroo Rat states: "To reduce impacts on SKR, a number of avoidance and minimization measures are provided, including Project Commitments B, D, and H. The Project Commitments require worker environmental training, require development of a Habitat Restoration and Revegetation Plan, and require construction noise control. Even with the implementation of these Project	Please update language to indicate the SCE will obtain take for SKR through the SKR HCP same as for the VIG project as follows: "Project-related impacts on SKR and associated burrows would be authorized through the SKR HCP. In October 2012, the applicant finalized the SKR HCP Implementation Agreement with the RCHCA (SCE 2014b). This agreement provides a

Project	Section	Page	DEIR Language	SCE Recommended Language
			Commitments, impacts to SKR would still be significant. MM BR-1 through MM BR-3 would limit construction to designated areas, and require preconstruction surveys and biological monitoring. MM BR-7 requires the applicant to develop a Habitat Restoration and Revegetation plan, including additional measures not described in Project Commitment D. MM BR-10 would prevent the entrapment of SKR. MM BR-16 pertains to protective measures that would be used during construction access to the Lake Mathews-Estelle Mountain Core Reserve. Collectively, these measures would reduce the likelihood that SKR are injured or killed, or that their habitat is adversely modified during construction. With implementation of these measures, impacts would be reduced to less than significant."	process through which the applicant may obtain take authorization of SKR through the SKR HCP for the proposed Valley–Ivyglen Project. The USFWS and the CDFW provided a joint letter of concurrence with the agreement. This take authorization is in accordance with the terms and conditions in the USFWS Management Authorization (or USFWS' Federal Permit), the SKR HCP, and the SKR HCP Implementation Agreement. MM BR-16 pertains to protective measures that would be used during construction access to the Lake Mathews-Estelle Mountain Core Reserve. With implementation of these measures, impacts would be reduced to less than significant. ~~To reduce impacts on SKR, a number of avoidance and minimization measures are provided, including Project Commitments B, D, and H. The Project Commitments require worker environmental training, require development of a Habitat Restoration and Revegetation Plan, and require construction noise control. Even with the implementation of these Project Commitments, impacts to SKR would still be significant. MM BR-1 through MM BR-3 would limit construction to designated areas, and require preconstruction surveys and biological monitoring. MM BR-7 requires the applicant to develop a Habitat Restoration and Revegetation plan, including additional measures not described in Project Commitment D. MM BR-10 would prevent the entrapment of SKR. MM BR-16 pertains to protective measures that would be used during construction access to the Lake Mathews-Estelle Mountain Core Reserve. Collectively, these measures would reduce the likelihood that SKR are injured or killed, or that their habitat is adversely modified during construction. With implementation of these measures, impacts would be reduced to less than significant.~~"
Alberhill	4.4.5.2	4.4-42	Line 4 under Mitigation Measures MM BR-16 states: "No more than 14 days prior to conducting any project construction activity within the Core Reserve, biological monitors qualified to monitor for SKR shall complete preconstruction surveys and flag confirmed and potential SKR	To clarify that this is required for work within the Core Reserve, SCE suggests the following edits: "No more than 14 days prior to conducting any project construction activity within the Core Reserve, biological monitors qualified to monitor for SKR shall complete

Project	Section	Page	DEIR Language	SCE Recommended Language
			burrow complexes (including burrows that may be used by other kangaroo rat species) for avoidance. Survey areas shall include Lake Street and all access roads to 500-kV tower sites evaluated in the EIR and approved by the CPUC for construction access, plus a 25-foot buffer area (except in areas inaccessible by foot) on each side of these roads. Surveyed and flagged areas shall also include all 500-kV ROWs to be accessed within the Core Reserve."	preconstruction surveys and flag confirmed and potential SKR burrow complexes (including burrows that may be used by other kangaroo rat species) for avoidance. ~~Survey areas shall include Lake Street and all access roads to 500-kV tower sites evaluated in the EIR and approved by the CPUC for construction access, plus a 25-foot buffer area (except in areas inaccessible by foot) on each side of these roads.~~ Surveyed and flagged areas shall ~~also~~ include all 500-kV ROWs to be accessed within the Core Reserve plus a 25-foot buffer area (except in areas inaccessible by foot) on each side of these roads."
Alberhill	4.4.5.2	4.4.-42	Line 33 under Mitigation Measures MM BR-16 Other Requirements states: "The applicant shall not access the 0.5-mile Hilltop Road segment located within the Core Reserve between 500-kV Towers M13-12 and M13-T1 other than by foot. If accessed by foot, no more than 14 days prior to access, preconstruction surveys shall be conducted along the 0.5-mile Hilltop Road segment to identify and flag potential kangaroo rat burrow complexes for avoidance."	SCE suggests the following edits: "The applicant shall not access the 0.5-mile access road ~~Hilltop Road~~ segment located within the Core Reserve between 500-kV Towers M13-T2 ~~12~~ and M13-T1 other than by foot or helicopter. If accessed by foot or helicopter, no more than 14 days prior to access, preconstruction surveys shall be conducted along the 0.5-mile Hilltop Road segment to identify and flag potential kangaroo rat burrow complexes for avoidance."
Alberhill	4.4.5.2	4.4-45	Line 26 under Impact BR-3 (ASP) states: "Construction of new access roads; clearing vegetation, which exposes topsoil to weathering and erosion; and installing facilities within wetland or upland drainage areas would result in direct, permanent impacts on federally protected wetlands (including upland areas and drainages) as defined by Section 404 of the CWA. These vernal pools, along with Riverside fairy shrimp and vernal pool fairy shrimp, are discussed above under Impact BR-1 (ASP). The applicant anticipates that approximately 0.3 acres of federally jurisdictional waters would be permanently impacted by construction (Appendix G, Table 4). Although not all of the features are considered to be federally protected wetland systems, several potentially support sensitive wildlife species, and may fall under the jurisdiction of the CDFW. Approximately 0.8 acres of	SCE suggests the following edits for clarity: "Construction of new access roads; clearing vegetation, which exposes topsoil to weathering and erosion; and installing facilities within wetland or upland drainage areas would result in direct, permanent impacts on federally protected wetlands and waters of the US ~~(including upland areas and drainages)~~ as defined by Section 404 of the CWA. These vernal pools, along with Riverside fairy shrimp and vernal pool fairy shrimp, are discussed above under Impact BR-1 (ASP). The applicant anticipates that approximately 0.3 acres of federally jurisdictional waters would be permanently impacted by construction (Appendix G, Table 4). Although not all of the features are considered to be federally protected wetland systems, several potentially support sensitive wildlife species, and may fall under the jurisdiction of the CDFW. Approximately 0.8 acres of

Project	Section	Page	DEIR Language	SCE Recommended Language
			waters under the jurisdiction of the CDFW may be permanently impacted. These features would generally be impacted only temporarily and would be restored following construction. These temporary impacts would total approximately 0.5 acres under the jurisdiction of the USACE and 1.71 acres under the jurisdiction of the CDFW (Appendix G, Table 4). However, permanent, direct impacts on wetlands may result from placing project elements within these features."	waters under the jurisdiction of the CDFW may be permanently impacted. These features would generally be impacted only temporarily and would be restored following construction. These temporary impacts would total approximately 0.5 acres under the jurisdiction of the USACE and 1.71 acres under the jurisdiction of the CDFW (Appendix G, Table 4). ~~However, permanent, direct impacts on wetlands may result from placing project elements within these features.~~"
Alberhill	4.4.5.2	4.4-46	Line 8-10 under heading Impact BR-3 (ASP) states: MM BR-15 would control erosion, sedimentation, and input of pollutants.	SCE suggests the following edits: "~~MM BR-15~~ BMPs would control erosion, sedimentation, and input of pollutants."
Alberhill	4.4.5.2	4.4-46	Line 20 under heading Mitigation Measures states: MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill	4.4.5.2	4.4-47	Line 21 under heading Impact BR-6 (ASP) states: "With the exception of an approximately 2-mile-long section of 115-kV Segment ASP2, each component of the proposed Alberhill Project would be constructed within the plan areas of the MSHCP and SKR HCP (Figure 4.4-1)."	SCE suggests the following edits: "~~With the exception of an approximately 2-mile-long section of 115-kV Segment ASP2,~~ e-Each component of the proposed Alberhill Project would be constructed within the plan areas of the MSHCP and SKR HCP (Figure 4.4-1)."
Alberhill	4.4.5.2	4.4-47	Line 29 under heading MSHCP and SKR HCP states: "The majority of the proposed project would be located within the SKR HCP area except for a section in the center of the proposed 115-kV Segment ASP2 route."	SCE suggests the following edits: "The ~~majority of the~~ proposed project would be located within the SKR HCP area ~~except for a section in the center of the proposed 115-kV Segment ASP2 route~~."
Alberhill	Section 4.4.5.2	4.4-47	Line 35 under the heading MSHCP and SKR HCP states: "As of October 15, 2012, the applicant finalized an SKR HCP Implementation Agreement with the RCHCA, which provides a process through which the applicant may obtain take	Please revise based on previous comment: "As of October 15, 2012, the applicant finalized an SKR HCP Implementation Agreement with the RCHCA, which provides a process through which the applicant may obtain take

Project	Section	Page	DEIR Language	SCE Recommended Language
			authorization of SKR pursuant to the SKR HCP (AMEC 2014a). The Implementation Agreement also applies to work within MSHCP areas identified as Additional Reserve Land because SKR HCP core reserve requirements do not apply to Additional Reserve Land (Figure 4.4-1). The Implementation Agreement also allows the applicant to obtain take for SKR on lands owned by Castle and Cooke. As of June, 2015, the RCHCA is processing a COI to formalize this take agreement and identify the applicant as a participant in the SKR HCP for both the Valley–Ivyglen and Alberhill projects. The COIs will be finalized prior to construction and will be included in the Notice to Proceed request for each project."	authorization of SKR pursuant to the SKR HCP (AMEC 2014a). ~~The Implementation Agreement also applies to work within MSHCP areas identified as Additional Reserve Land because SKR HCP core reserve requirements do not apply to Additional Reserve Land (Figure 4.4-1).~~ The Implementation Agreement also allows the applicant to obtain take for SKR on lands owned by Castle and Cooke. As of June, 2015, the RCHCA is processing a COI to formalize this take agreement and identify the applicant as a participant in the SKR HCP for both the Valley–Ivyglen and Alberhill projects. The COIs will be finalized prior to construction and will be included in the Notice to Proceed request for each project."
	4.5	4.5-1	Line 16 under heading Cultural Resources states: "The cultural resources discussed in this section may be described as historic resources, archaeological resources, Native American resources, or paleontological resources:"	SCE suggests the following edits: The cultural resources discussed in this section are 50-years or older, and may be described as historical resources, archaeological resources, Native American resources, or paleontological resources:"
Alberhill/ Valley-Ivyglen	4.5	4.5-1	Line 19 under heading Cultural Resources states: "Historic Resources: As defined by the California Environmental Quality Act (CEQA), historic resources are those resources that are listed on, or determined to be eligible for listing on, the California Register of Historical Resources (California Register) or a local register, or are otherwise determined to be historic pursuant to CEQA or the CEQA Guidelines (Public Resources Code [PRC] § 21084.1 or Code of Regulations, title 14, § 15064.5, respectively). An historic resource, for example, may be an object, building, structure, site, area, place, record, or manuscript that is historically significant or significant in terms of California's architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records. Typically, historic resources are more than 50 years old."	SCE suggests the following edits: Historical Resources: As defined by the California Environmental Quality Act (CEQA), historical resources are those resources that are listed on, or determined to be eligible for listing on, the California Register of Historical Resources (California Register) or a local register, or are otherwise determined to be historic pursuant to CEQA or the CEQA Guidelines (Public Resources Code [PRC] § 21084.1 or Code of Regulations, title 14, § 15064.5, respectively). An historical resource, for example, may be an object, building, structure, site, area, place, record, or manuscript that is historically significant or significant in terms of California's architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records. ~~Typically, historic resources are more than 50 years old.~~

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.5	4.5-1	Line 28 under heading Cultural Resources states: "Archaeological Resources: Archaeological resources may be considered historic resources or…"	SCE suggests the following edits: "Archaeological Resources: Archaeological resources may be considered historical resources or…"
Alberhill/ Valley-Ivyglen	4.5.1	4.5-14	Line 39 heading Paleontology Background and Records Search Results	SCE recommends to add a paleo sensitivity map showing areas of geological formations that are considered to have high potential to yield fossils for each project element.
Alberhill/ Valley-Ivyglen	4.5.2.3	4.5-19	Line 15 under heading Locals	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Alberhill/ Valley-Ivyglen	4.5.2.3	4.5-19	Line 26 under heading Local states: "County of Orange The County of Orange General Plan establishes the following goals that are relevant to the protection of cultural and paleontological resources:	The first paragraph of Sec 4.5 (lines 6-9) states that no resources will be impacted therefore impacts to resources are not considered further at these locations. Therefore, all OC regulations should be removed. "~~County of Orange~~ ~~The County of Orange General Plan establishes the following goals that are relevant to the protection of cultural and paleontological resources:~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			• Cultural-Historic Resources Goal 2: To encourage through a resource management effort the preservation of the county's cultural and historic heritage. • Cultural-Historic Resources Goal 3: To preserve and enhance buildings, structures, objects, sites, and districts of cultural and historic significance."	• ~~Cultural-Historic Resources Goal 2: To encourage through a resource management effort the preservation of the county's cultural and historic heritage.~~ • ~~Cultural-Historic Resources Goal 3: To preserve and enhance buildings, structures, objects, sites, and districts of cultural and historic significance.~~"
Valley-Ivyglen	4.5.4.2	4.5-22	Line 31 under heading Impact CR-1 (VIG) states: "There would be no substantial adverse change to the significance of P33-17016 with implementation of MM CR-6."	SCE suggests the following edits: "There would be no substantial adverse change to the significance of P33-000714/CA-RIV-714 ~~P33-17016~~ with implementation of MM CR-6."
Valley-Ivyglen	4.5.4.2	4.5-23	Line 21 under heading Construction states: "…implementation of MM CR-1a, MM CR-1b, MM CR-2, and MM CR-3."	SCE suggests striking MM CR-3 as this mitigation measure is redundant to MM CR-1b. …implementation of MM CR-1a, MM CR-1b, and MM CR-2~~, and MM CR-3~~.
Valley-Ivyglen	4.5.4.2	4.5-24	Line 1 under heading MM CR-1a states: "If known resources are located in the work area or staging area, they must be avoided pursuant to MM CR-1b. Previously unknown resources that are discovered during work activities shall be subject to MM CR-1b."	If avoidance is not feasible, the mitigation measure should include an option to evaluate and mitigate. SCE suggests the following edits: "If known resources are located in the work area or staging area, they must be handled ~~avoided~~ pursuant to MM CR-1b. Previously unknown resources that are discovered during work activities shall be subject to MM CR-1b."
Valley-Ivyglen	4.5.4.2	4.5-24	Line 27 under heading MM CR-1b states: "ESAs containing cultural resources shall not be identified on the ground or on maps to be used by anyone other than the qualified archaeologist, Native American monitors, cultural resource monitors, or other cultural resource professionals, as being cultural resources."	SCE suggests the following edits: "ESAs containing cultural resources shall not be identified on the ground or on maps to be used by anyone other than the qualified archaeologist, Native American monitors, cultural resource monitors, or other cultural resource professionals~~, as being cultural resources~~."

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.5.4.2	4.5-24	Line 31 under heading MM CR-1b states: "The sole method of mitigation in the CRMTP for known resources shall be total avoidance of the resource (preservation in place), per CEQA Guidelines section 15126.4(b)(3)(A). The preferred method of mitigation in the CRMTP for unanticipated resources shall be total avoidance (preservation in place)."	If avoidance is not feasible, there should be an option to mitigate. SCE suggests the following edits: "The preferred ~~sole~~ method of mitigation in the CRMTP for known resources shall be total avoidance of the resource (preservation in place), per CEQA Guidelines section 15126.4(b)(3)(A). The preferred method of mitigation in the CRMTP for unanticipated resources shall be total avoidance (preservation in place). If avoidance is determined to be infeasible, the applicant shall prepare a Data Recovery Plan."
Valley-Ivyglen	4.5.4.2	4.5-24	Line 36 under heading MM CR-1b states: "The CRMPT shall require that work shall be halted within 100 feet of the resource, protective barriers shall be installed along with signage identifying the area only as an "environmentally sensitive area" and forbidding entry into the area by all but authorized personnel, and the qualified archaeologist and the CPUC shall be notified."	SCE suggests the following edits because the nature and context of newly discovered resources can vary, and as a result we propose to include this additional language to allow flexibility during construction when addressing buffer zones on newly discovered resources based on the nature and location of the find: "The CRMPT shall require that work shall be temporarily halted within 100 feet or to the extent possible to avoid impacting ~~of~~ the resource, appropriate temporary protective barriers shall be installed along with signage identifying the area only as an "environmentally sensitive area" and forbidding entry into the area by all but authorized personnel, and the qualified archaeologist and the CPUC shall be notified."
Valley-Ivyglen	4.5.4.2	4.5-25	Line 5 under heading MM CR-1b states: "Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the historic resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan should describe the archaeological testing procedures, including, but not	SCE suggests changing "historic" to "historical" as noted below: "Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the historic resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan should describe the archaeological testing procedures, including, but not

Project	Section	Page	DEIR Language	SCE Recommended Language
			limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an historic resource. If the discovery is not found to be an historic resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an historic resource, SCE shall prepare a Data Recovery Plan."	limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an historical resource. If the discovery is not found to be an historical resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an historical resource, SCE shall prepare a Data Recovery Plan."
Valley-Ivyglen	4.5.4.2	4.5-25	Line 22 under heading Data Recovery Plan states: "Data recovery plans for historic resources that cannot be fully avoided…"	SCE suggests changing "historic" to "historical" as noted below: "Data recovery plans for historical resources that cannot be fully avoided…"
Valley-Ivyglen	4.5.4.2	4.5-25	Line 29 under heading Data Recovery Plan states: "…information relevant to the aspects of the site that make it an historic resource, and reporting…"	SCE suggests changing "historic" to "historical" as noted below: "…information relevant to the aspects of the site that make it an historical resource, and reporting…"
Valley-Ivyglen	4.5.4.2	4.5-26	Line 11 under heading MM CR-2 states: "MM CR-2: Monitor ground disturbing activities (includes Native American monitoring). Archaeological monitoring shall be required for ground disturbing activities in areas with moderate to high archaeological sensitivity."	SCE recommends the following edits to address monitoring effort to a reasonable level, and to focus monitoring efforts in areas that have a higher potential to uncover buried archaeological resources. "MM CR-2: Monitor ground disturbing activities (includes Native American monitoring). Archaeological monitoring shall be required for all new ground disturbing activities within Alberhill Substation, new access road construction and near prehistoric ESAs ~~areas with moderate to high archaeological sensitivity~~. Spot check monitoring of areas with moderate to high

Project	Section	Page	DEIR Language	SCE Recommended Language
				sensitivity will be defined in the CRMTP and instituted appropriately during construction."
Valley-Ivyglen	4.5.4.2	4.5-26	Line 27 under heading MM CR-2 states: "Tribes requesting presence at construction or excavation activities shall be given 30 days advance notice and shall be provided the opportunity to monitor construction activities as requested in consultation with SCE subject to the terms of this mitigation measure. The applicant shall make a good-faith best effort to schedule construction when a monitor is available."	During construction, SCE prepares a 3-day look ahead schedule for planned construction activities and locations during that time period. These schedules are updated daily and distributed to the construction monitors and 3rd party monitors, like cultural monitors provided by the Tribes. Providing 30 days advanced notice to the Tribes is not feasible during construction. The construction crews need to be flexible and able to move their work areas as need in the event an unforeseeable condition occurs (e.g., nesting bird). "Tribes requesting presence at construction or excavation activities shall be given 3~~0~~ days advance notice and shall be provided the opportunity to monitor construction activities as requested in consultation with SCE subject to the terms of this mitigation measure. ~~The applicant shall make a good-faith best effort to schedule construction when a monitor is available.~~"
Valley-Ivyglen	4.5.4.2	4.5-26	Line 35 under heading MM CR-2 states: "The Native American monitors shall have the ability to temporarily halt work or redirect grading from the immediate vicinity of a potential unanticipated archaeological find that may require recordation and evaluation. The archaeological monitor shall be notified immediately to determine the procedure to follow per MM CR-1b."	SCE suggests the following edits: "The Native American monitors shall have the ability to temporarily halt work or redirect grading from the immediate vicinity of a potential unanticipated archaeological find that may require recordation and evaluation after consulting with the archaeological monitor. The archaeological monitor shall ~~be notified immediately to~~ determine the procedure to follow per MM CR-1b."
Valley-Ivyglen	4.5.4.2	4.5-26	Line 40 under heading MM CR-3 states: "MM CR-3: Follow historic resource and unique archaeological resource discovery protocol. In the case that a previously unknown resource is discovered during construction activities, the CPUC-approved archaeologist shall determine whether the resource is an historical resource as defined in CEQA Guidelines	This measure is redundant to MM CR-1b. SCE suggest striking this measure. ~~MM CR-3: Follow historic resource and unique archaeological resource discovery protocol. In the case that a previously unknown resource is discovered during construction activities, the CPUC-approved archaeologist shall determine whether the~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			section 15064.5(a) or a unique archaeological resource as defined in PRC section 21083.2(g). Work can recommence if the resource is determined to be neither. Work shall not be allowed within 150 feet of the resource if the resource meets the criteria for either a historic or unique archaeological resource. The archaeologist shall then consult with the CPUC and adhere to the CRMPT (MM CR-1b) to determine the course of action required to prevent a substantial adverse change to an historical resource or a significant effect on a unique archaeological resource."	~~resource is an historical resource as defined in CEQA Guidelines section 15064.5(a) or a unique archaeological resource as defined in PRC section 21083.2(g). Work can recommence if the resource is determined to be neither. Work shall not be allowed within 150 feet of the resource if the resource meets the criteria for either a historic or unique archaeological resource. The archaeologist shall then consult with the CPUC and adhere to the CRMPT (MM CR-1b) to determine the course of action required to prevent a substantial adverse change to an historical resource or a significant effect on a unique archaeological resource.~~
Valley-Ivyglen	4.5.4.2	4.5-27	Line 23 under heading Construction states: "MM CR-4 will require monitoring where it has been determined that there is a reasonable potential for discovery of fossils in the project area based on information from the records search and literature review summarized in Table 4.5-6."	To clarify the potential for discovery of fossils, SCE suggests the following edits: "MM CR-4 will require monitoring where it has been determined that there is a reasonable potential for discovery of fossils, as defined in the PRMP, in the project area based on information from the records search and literature review summarized in Table 4.5-6."
Valley-Ivyglen	4.5.4.2	4.5-27	Line 37 under heading MM CR-4 states: "SCE shall retain a qualified paleontologist to monitor ground-disturbing activities in paleontologically sensitive areas. The qualified paleontologist shall prepare a brief Paleontological Resource Monitoring Plan that includes methods of paleontological monitoring and includes construction maps delineating areas of ground disturbance that shall be monitored for paleontological resources. These shall include areas where:"	SCE recommends the following edits because the likelihood of observing and recovering significant fossils from drilling and augering activities is low. "SCE shall retain a qualified paleontologist to monitor ground-disturbing activities (except drilling activities) in paleontologically sensitive areas as defined in the Paleontological Resource Monitoring Plan. The qualified paleontologist shall prepare a brief Paleontological Resource Monitoring Plan that includes methods of paleontological monitoring and includes construction maps delineating areas of ground disturbance that shall be monitored for paleontological resources. These shall include areas where:"
Valley-Ivyglen	4.5.4.2	4.5-27	Line 48 under heading MM CR-4 states: "Areas where fossils would likely occur include but are not limited to the Silverado Foundation."	SCE suggests the following edits: Areas where fossils would likely occur include but are not limited to the Silverado ~~Foundation~~ Formation.

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.5.4.2	4.5-28	Line 2 under heading MM CR-4 states: "Only CPUC-approved paleontological monitors shall serve on this project. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential finds in order to begin implementation of MM CR-5."	SCE recommends the following edits to address reduction in monitoring of areas where fossils are consistently absent, and may no longer have the potential to yield significant fossil. "Only CPUC-approved paleontological monitors shall serve on this project. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential finds in order to begin implementation of MM CR-5. A reduction in monitoring activities will be determined based on field observations and in coordination with SCE and CPUC."
Valley-Ivyglen	4.5.4.2	4.5-28	Line15 under heading MM CR-5 states: "Significant paleontological resources are fossils and fossiliferous deposits, here defined as 15 consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and 16 trace fossils, and other data that provide taphonomic, taxonomic, phylogentic, paleoecologic, stratigraphic, and/or biochronologic information."	SCE suggests the following edits: Significant paleontological resources are fossils and fossiliferous deposits, here defined as 15 consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and 16 trace fossils, and other data that provide taphonomic, taxonomic, ~~phylogentic~~ phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information.
Valley-Ivyglen	4.5.4.2	4.5-28	Line 38 under heading Construction states: "Another nearby potential archaeological resource located approximately 0.8 miles from the Alberhill Substation site may contain human remains."	If SCE is following CR-7, the knowledge of other sites near by the project becomes irrelevant. Regardless of known human remain finds near the proposed project, implementation of MM CR-7 will occur if human remains are found within the project area. SCE suggests the following edits: ~~Another nearby potential archaeological resource located approximately 0.8 miles from the Alberhill Substation site may contain human remains.~~
Alberhill	4.5.4.2	4.5-30	Line 20 under heading Construction – Alberhill Substation Site and 115-kV Segments ASP 1 and ASP1.5 states: "Resource P22-15428, a house built in 1920, has not been evaluated for California or National Register eligibility."	SCE suggests the following edits: "Resource ~~P22-15428~~ P33-15428, a house built in 1920, has not been evaluated for California or National Register eligibility."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	4.5.4.2	4.5-30	Line 38 under heading Construction – Alberhill Substation Site and 115-kV Segments ASP 1 and ASP1.5 states: "…archaeological resources, would be significant if the resources are considered historic resources and if the…"	SCE suggests the following edits: "…archaeological resources, would be significant if the resources are considered historical resources and if the…"
Alberhill	4.5.4.2	4.5-30	Line 48 under heading Construction – Alberhill Substation Site and 115-kV Segments ASP 1 and ASP1.5 states: "MM CR-3 describes procedures to be followed on-site if a previously unknown resource is discovered. Impacts to previously undiscovered cultural resources (including historical and unique archaeological resources) would be less than significant with implementation of MM CR-1a, MM CR-1b, MM CR-2, and MM CR-3."	SCE suggests striking MM CR-3 as this mitigation measure is redundant to MM CR-1b. "~~MM CR-3 describes procedures to be followed on-site if a previously unknown resource is discovered.~~ Impacts to previously undiscovered cultural resources (including historical and unique archaeological resources) would be less than significant with implementation of MM CR-1a, MM CR-1b, and MM CR-2~~, and MM CR-3~~."
Alberhill	4.5.4.2	4.5-31	Line 45 under heading ASP 500-kV Transmission Line Routes states: "…CR-2, and MM CR-3 would be implemented for these project components…"	SCE suggests striking MM CR-3 as this mitigation measure is redundant to MM CR-1b. "…and CR-2~~, and MM CR-3~~ would be implemented for these project components…"
Alberhill	4.5.4.2	4.5-32	Line 2 under heading ASP 500-kV Transmission Line Routes states: "…MM CR-2, and MM CR-3."	SCE suggests striking MM CR-3 as this mitigation measure is redundant to MM CR-1b. and MM CR-2~~, and MM CR-3~~
Alberhill	4.5.4.2	4.5-32	Line 39 under heading 115-kV Segments ASP2 through ASP8 states: "MM CR-1a, MM CR-1b, MM CR-2, and MM CR-3 would be implemented for these project components, as described in the substation site analysis, to reduce impacts to previously undiscovered cultural resources. Impacts to previously undiscovered cultural resources (including historical and unique archaeological resources) would be less than significant with implementation of MM CR-1a, MM CR-1b, MM CR-2, and MM CR-3."	SCE suggests striking MM CR-3 as this mitigation measure is redundant to MM CR-1b. "MM CR-1a, MM CR-1b, and MM CR-2~~, and MM CR-3~~ would be implemented for these project components, as described in the substation site analysis, to reduce impacts to previously undiscovered cultural resources. Impacts to previously undiscovered cultural resources (including historical and unique archaeological resources) would be less than significant with implementation of MM CR-1a, MM CR-1b, and MM CR-2~~, and MM CR-3~~."

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.6.2.3	4.6-12	Line 33 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen	4.6.4.1	4.6-16		SCE suggests adding the requirements of MM GE-1: Seismic Safety Training to Project Commitment B; therefore SCE suggests including the edited Project Commitment B to this Section, 4.6.4.1 as follows: Project Commitment B: Worker Environmental Awareness Plan. Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission (CPUC). A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any site-specific biological or cultural resource protective measures and project mitigation measures, all construction personnel would also receive the following:

Project	Section	Page	DEIR Language	SCE Recommended Language
				• A list of phone numbers of the applicant's personnel (i.e., archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator); • Instruction on the South Coast Air Quality Management District Rule 403 for control of dust; • Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator; • Instruction on washing the wheels, tracks, and underbodies of construction vehicles to minimize the spread of invasive species; • Instruction on individual responsibilities under the CWA, the Storm Water Pollution Prevention Plan (SWPPP) for the proposed projects, site-specific Best Management Practices (BMPs), and the location of Material Safety Data Sheets for the proposed projects; • Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination; • Instructions to follow worker safety guidelines and policies in the event of an earthquake; • A copy of the truck routes to be used for material delivery; and • Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed projects.
Valley-Ivyglen	4.6.4.1	4.6-16	Line 9 under heading Project Commitment D states: "Project Commitment D: Habitat Restoration and Revegetation Plan. With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore areas where construction of the projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all areas disturbed during construction of	For consistency with Table 2-12, SCE suggests the following edits: "Project Commitment D: Habitat Restoration and Revegetation Plan. With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore temporarily impacted areas where construction of the projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other

Project	Section	Page	DEIR Language	SCE Recommended Language
			the projects, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner."	sensitive natural communities. The applicant would restore all temporarily impacted areas disturbed during construction of the projects, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner."
Valley-Ivyglen	4.6.4.1	4.6-16	Line 19 under heading Project Commitment E states: "Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects. The County will review and approved final grading (and drainage) plans prior to start of construction. Storm water improvement sections of the plans shall be designed to maintain a discharge of storm water runoff consistent with the characteristics of storm water runoff presently discharged from project areas including the Alberhill Substation site. Measures included in the plans shall minimize adverse effects on existing or planned storm water drainage systems. Ground surface improvements installed at the site pursuant to the plans shall be designed to minimize discharge of materials that would contribute to a violation of water quality standards or waste discharge requirements. The final grading design shall include features that would minimize erosion and siltation both onsite and offsite. In addition, the final grading (and drainage) design shall be based on the results of the geotechnical study and soil evaluation for the substation site (Project Commitment F)."	For consistency with Table 2-12, SCE suggests the following edits: "Project Commitment E: Grading Plan. SCE shall consult with ~~The~~ Riverside County ~~Flood Control and Water Conservation District shall be consulted~~ regarding grading the plans for construction and operation of the proposed projects. ~~The County will review and approved final grading (and drainage) plans prior to start of construction.~~ Storm water improvements ~~sections of the plans~~ shall be designed to maintain a discharge of storm water runoff consistent with the characteristics of storm water runoff presently discharged from project areas including the Alberhill Substation site. Measures included in the plans shall minimize adverse effects on existing or planned storm water drainage systems. Ground surface improvements installed at the site pursuant to the plans shall be designed to minimize discharge of materials that would contribute to a violation of water quality standards or waste discharge requirements. The final grading design shall include features that would minimize erosion and siltation both onsite and offsite. In addition, the final grading (and drainage) design shall be based on the results of the geotechnical study and soil evaluation for the substation site (Project Commitment F)."
Valley-Ivyglen	4.6.4.1	4.6-16	Line 32 under heading Project Commitment F states: "Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. Prior to the start of construction, the applicant shall conduct geotechnical and hydrologic studies and field investigations of the Alberhill Substation site, 500-kV	For consistency with Table 2-12, SCE suggests the following edits: "Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. Prior to the start of construction, the applicant shall conduct geotechnical and hydrologic studies and

Project	Section	Page	DEIR Language	SCE Recommended Language
			transmission line routes, all 115-kV subtransmission line routes, and all telecommunications line routes. The studies shall include an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils, soil resistivity, and slope stability (landslide susceptibility). The studies shall include soil boring and laboratory testing to determine the engineering properties of soils, would characterize soils and underlying bedrock units, characterize groundwater conditions, and evaluate faulting and seismicity risk. Soil samples shall be collected and analyzed for common contaminants and the presence of hazardous materials. If chemicals are detected in the soil samples at concentrations above action levels, the applicant shall avoid the contaminated soil or work with the property owner to remove the contaminated soil. The results of this study shall be applied to final engineering designs for the projects. The information collected shall be used to determine final tubular steel pole foundation designs. In addition, the applicant shall design Alberhill Substation consistent with the Institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations."	field investigations of the Alberhill Substation site, 500-kV transmission line routes, all 115-kV subtransmission line routes, and all telecommunications line routes. The studies shall include an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils, soil resistivity, and slope stability (landslide susceptibility). The studies shall include soil boring and laboratory testing to determine the engineering properties of soils, would characterize soils and underlying bedrock units, characterize groundwater conditions, and evaluate faulting and seismicity risk. Soil samples shall be collected and analyzed for common contaminants and the presence of hazardous materials. If chemicals are detected in the soil samples at concentrations above acceptable ~~action~~ levels, the applicant shall avoid the above threshold ~~contaminated~~ soil or work with the property owner to remove the above threshold ~~contaminated~~ soil. The results of this study shall be applied to final engineering designs for the projects. The information collected shall be used to determine final tubular steel pole foundation designs. In addition, the applicant shall design Alberhill Substation consistent with the applicable federal, states, and local codes including the Institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations."
Valley-Ivyglen	4.6.4.2	4.6-17	Line 3 under heading Impacts Analysis (Valley-Ivyglen Project) states: "Impact GE-1 (VIG): Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides. LESS THAN SIGNIFICANT WITH MITIGATION"	To be consistent with the seismic training added to Project Commitment B, SCE suggests the following revision: "Impact GE-1 (VIG): Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides. LESS THAN SIGNIFICANT ~~WITH MITIGATION~~"

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.6.4.2	4.6-17	Line 26 under heading Impact GE-1 (VIG) states: "Construction Although there is a risk of an earthquake occurring in the area, the chance of an earthquake occurring during the 27-month construction period is low. However, such an event would expose construction workers onsite to seismic hazards. This impact would be potentially significant. MM GE-1 would ensure that, prior to start of construction, construction personnel receive training about seismic risks and the applicant's safety guidelines in the event of an earthquake and that workers follow the guidelines during construction. Impacts would be less than significant with implementation of MM GE-1."	To be consistent with the seismic training added to Project Commitment B, SCE suggests the following revision: "Construction Although there is a risk of an earthquake occurring in the area, the chance of an earthquake occurring during the 28~~27~~-month construction period is low. However, such an event would expose construction workers onsite to seismic hazards. This impact would be potentially significant. Project Commitment B ~~MM GE-1~~ would ensure that, prior to start of construction, construction personnel receive training about seismic risks and the applicant's safety guidelines in the event of an earthquake and that workers follow the guidelines during construction. Impacts would be less than significant ~~with implementation of MM GE-1~~."
Valley-Ivyglen	4.6.4.2	4.6-17	Line 44 under heading Mitigation Measures states: "MM GE-1: Seismic Safety Training. The applicant shall ensure that all construction personnel adhere to the applicant's worker safety guidelines and policies to avoid additional adverse effects to health and safety in the event of an earthquake during construction. These guidelines and policies shall be communicated to construction personnel during a pre-construction Worker Environmental Awareness Program (to be implemented under Project Commitment B), which shall highlight seismic activity as a potential hazard during onsite construction."	To be consistent with the seismic training added to Project Commitment B, SCE suggests the following revision: ~~MM GE-1: Seismic Safety Training. The applicant shall ensure that all construction personnel adhere to the applicant's worker safety guidelines and policies to avoid additional adverse effects to health and safety in the event of an earthquake during construction. These guidelines and policies shall be communicated to construction personnel during a pre-construction Worker Environmental Awareness Program (to be implemented under Project Commitment B), which shall highlight seismic activity as a potential hazard during onsite construction.~~
Valley-Ivyglen	4.6.4.2	4.6-18	Line 4 under heading Mitigation Measure states: Impact GE-2 (VIG): Result in substantial soil erosion or the loss of topsoil. LESS THAN SIGNIFICANT WITH MITIGATION	For consistency with SCE's proposed removal of MM BR-15, SCE suggests the following edits: Impact GE-2 (VIG): Result in substantial soil erosion or the loss of topsoil. LESS THAN SIGNIFICANT ~~WITH MITIGATION~~

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.6.4.2	4.6-18	Line 14 under heading Impact GE-2 (VIG) states: "Construction During construction, erosion would occur from soil disturbance during grading and excavation associated with subtransmission line and fiber optic line construction. Soil disturbance would be distributed along the entire alignment, such that the amount of erosion or loss of topsoil at any one location would be minor. As a whole, however, construction of the proposed project could result in substantial soil erosion. This impact would be potentially significant. The applicant would implement Project Commitment D, which would require restoration of temporarily disturbed areas and prevent erosion after construction. Project Commitment E would require preparation of a grading plan that would in part aim to reduce erosion. Project Commitment D would not address impacts during construction, and Project Commitment E would address erosion only from grading activities. However, impacts would remain significant. MM BR-15 would require implementation of certain erosion BMPs during construction as part of the SWPPP developed for the proposed project. Impacts would be less than significant after implementation of MM BR-15."	This is a regulatory requirement not a mitigation measures. Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is required. Please modify as follows: "Construction During construction, erosion would occur from soil disturbance during grading and excavation associated with subtransmission line and fiber optic line construction. Soil disturbance would be distributed along the entire alignment, such that the amount of erosion or loss of topsoil at any one location would be minor. As a whole, however, construction of the proposed project could result in substantial soil erosion. This impact would be potentially significant. The applicant would implement Project Commitment D, which would require restoration of temporarily disturbed areas and prevent erosion after construction. Project Commitment E would require preparation of a grading plan that would in part aim to reduce erosion. Project Commitment D would not address impacts during construction, and Project Commitment E would address erosion only from grading activities. ~~However, impacts would remain significant MM BR-15 would require implementation of certain erosion BMPs during construction as part of the SWPPP developed for the proposed project. Impacts would be less than significant after implementation of MM BR-15.~~ The erosion potential would be considered when developing BMPs included in the SWPPP. In addition, soil exposure to erosion would be temporary and stabilized following the completion of construction. Because impacts to erosion would be temporary and controlled through the use of BMPs, impacts would be less than significant."
Valley-Ivyglen	4.6.4.2	4.6-18	Line 32 under heading Mitigation Measure states: MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).	For reasons previously stated, SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	4.6.5.1	4.6-20	Line 24 under heading Project Commitments (Alberhill Project) states: "Project Commitment A: Landscaping and Irrigation Plan. For the Alberhill Project, prior to the start of construction, the applicant would develop a Landscaping and Irrigation Plan for Alberhill Substation that is consistent with surrounding community standards. The applicant would consult with Riverside County about the Plan and incorporate applicable County recommendations to the extent possible. Landscaping would be designed to filter views from the surrounding community and other potential sensitive receptors near the proposed substation and be consistent with the surrounding community. The landscape plan would include a plant species list and installation and construction requirements. The applicant would contract a landscape architect to complete the landscaping plan during final engineering for the Alberhill Project. Irrigation and landscaping installation would occur after construction of the substation perimeter wall and water service has been established. During operations, the applicant would maintain the substation site pursuant to the Landscaping and Irrigation Plan and be responsible for upkeep as long as the applicant owns the property."	For consistency with Table 2-12, SCE suggests the following edits: "Project Commitment A: Landscaping and Irrigation Plan. For the Alberhill Project, ~~prior to the start of construction,~~ the applicant would develop a Landscaping and Irrigation Plan for Alberhill Substation road frontage only along Temescal Canyon Road, Concordia Ranch Road and Love Lane that is consistent with surrounding community standards, substation security and safety requirements. The applicant would consult with Riverside County about the Plan and incorporate applicable County recommendations to the extent possible. Landscaping would be designed to filter views from the surrounding community and other potential sensitive receptors near the proposed substation and be consistent with the surrounding community. The landscape plan would include a plant species list and installation and construction requirements. The applicant would contract a landscape architect to complete the landscaping plan during final engineering for the Alberhill Project. Irrigation and landscaping installation would occur after construction of the substation perimeter wall, subtransmission and transmission poles/towers erected, underground utility lines/cable ducts installed, and water service has been established. During operations, the applicant would maintain the substation site pursuant to the Landscaping and Irrigation Plan and be responsible for upkeep as long as the applicant owns the property."
Alberhill	4.6.4.2	4.6-20		SCE suggests adding the requirements of MM GE-1: Seismic Safety Training to Project Commitment B; therefore SCE suggests including the edited Project Commitment B to this Section, 4.6.4.1 as follows: Project Commitment B: Worker Environmental Awareness Plan. Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission (CPUC). A presentation would be prepared by the applicant and

Project	Section	Page	DEIR Language	SCE Recommended Language
				shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any site-specific biological or cultural resource protective measures and project mitigation measures, all construction personnel would also receive the following: • A list of phone numbers of the applicant's personnel (i.e., archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator); • Instruction on the South Coast Air Quality Management District Rule 403 for control of dust; • Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator; • Instruction on washing the wheels, tracks, and underbodies of construction vehicles to minimize the spread of invasive species; • Instruction on individual responsibilities under the CWA, the Storm Water Pollution Prevention Plan (SWPPP) for the proposed projects, site-specific Best Management Practices (BMPs), and the location of Material Safety Data Sheets for the proposed projects; • Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination; • Instructions to follow worker safety guidelines and policies in the event of an earthquake; • A copy of the truck routes to be used for material delivery; and • Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed projects.
Alberhill	4.6.5.1	4.6-20	Line 37 under heading Project Commitment D states: "Project Commitment D: Habitat Restoration and Revegetation Plan. With input from the appropriate resource agencies, the	For consistency with Table 2-12, SCE suggests the following edits:

Project	Section	Page	DEIR Language	SCE Recommended Language
			applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore areas where construction of the projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all areas disturbed during construction of the projects, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner."	"Project Commitment D: Habitat Restoration and Revegetation Plan. With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore temporarily impacted areas where construction of the projects would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all temporarily impacted areas disturbed during construction of the projects, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner."
Alberhill	4.6.5.1	4.6-20	Line 47 under heading Project Commitment E states: "Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects. The County will review and approved final grading (and drainage) plans prior to start of construction. Storm water improvements sections of the plans shall be designed to maintain a discharge of storm water runoff consistent with the characteristics of storm water runoff presently discharged from project areas including the Alberhill Substation site. Measures included in the plans shall minimize adverse effects on existing or planned storm water drainage systems. Ground surface improvements installed at the site pursuant to the plans shall be designed to minimize discharge of materials that would contribute to a violation of water quality standards or waste discharge requirements. The final grading design shall include features that would minimize erosion and siltation both onsite and offsite. In addition, the final grading (and drainage) design shall be based on the results of the geotechnical study and soil evaluation for the substation site (Project Commitment F)."	For consistency with Table 2-12, SCE suggests the following edits: "Project Commitment E: Grading Plan. SCE shall consult with ~~The~~ Riverside County ~~Flood Control and Water Conservation District shall be consulted~~ regarding grading the plans for construction and operation of the proposed projects. ~~The County will review and approved final grading (and drainage) plans prior to start of construction.~~ Storm water improvements ~~sections of the plans~~ shall be designed to maintain a discharge of storm water runoff consistent with the characteristics of storm water runoff presently discharged from project areas including the Alberhill Substation site. Measures included in the plans shall minimize adverse effects on existing or planned storm water drainage systems. Ground surface improvements installed at the site pursuant to the plans shall be designed to minimize discharge of materials that would contribute to a violation of water quality standards or waste discharge requirements. The final grading design shall include features that would minimize erosion and siltation both onsite and offsite. In addition, the final grading (and drainage) design shall be based on the results of the

Project	Section	Page	DEIR Language	SCE Recommended Language
				geotechnical study and soil evaluation for the substation site (Project Commitment F)."
Alberhill	4.6.5.1	4.6-21	Line 12 under heading Project Commitment F states: "Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. Prior to the start of construction, the applicant shall conduct geotechnical and hydrologic studies and field investigations of the Alberhill Substation site, 500-kV transmission line routes, all 115-kV subtransmission line routes, and all telecommunications line routes. The studies shall include an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils, soil resistivity, and slope stability (landslide susceptibility). The studies shall include soil boring and laboratory testing to determine the engineering properties of soils, would characterize soils and underlying bedrock units, characterize groundwater conditions, and evaluate faulting and seismicity risk. Soil samples shall be collected and analyzed for common contaminants and the presence of hazardous materials. If chemicals are detected in the soil samples at concentrations above action levels, the applicant shall avoid the contaminated soil or work with the property owner to remove the contaminated soil. The results of this study shall be applied to final engineering designs for the projects. The information collected shall be used to determine final tubular steel pole foundation designs. In addition, the applicant shall design Alberhill Substation consistent with the the Institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations."	For consistency with Table 2-12, SCE suggests the following edits: "Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. Prior to the start of construction, the applicant shall conduct geotechnical and hydrologic studies and field investigations of the Alberhill Substation site, 500-kV transmission line routes, all 115-kV subtransmission line routes, and all telecommunications line routes. The studies shall include an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils, soil resistivity, and slope stability (landslide susceptibility). The studies shall include soil boring and laboratory testing to determine the engineering properties of soils, would characterize soils and underlying bedrock units, characterize groundwater conditions, and evaluate faulting and seismicity risk. Soil samples shall be collected and analyzed for common contaminants and the presence of hazardous materials. If chemicals are detected in the soil samples at concentrations above acceptable ~~action~~ levels, the applicant shall avoid the above threshold ~~contaminated~~ soil or work with the property owner to remove the above threshold ~~contaminated~~ soil. The results of this study shall be applied to final engineering designs for the projects. The information collected shall be used to determine final tubular steel pole foundation designs. In addition, the applicant shall design Alberhill Substation consistent with the applicable federal, states, and local codes including the Institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations."
Alberhill	4.6.5.2	4.6-21	Line 31 under heading Impact GE-1 (ASP) states: "Impact GE-1 (ASP): Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated	To be consistent with the seismic training added to Project Commitment B, SCE suggests the following revision: "Impact GE-1 (ASP): Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or

Project	Section	Page	DEIR Language	SCE Recommended Language
			on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides. LESS THAN SIGNIFICANT WITH MITIGATION"	death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides. LESS THAN SIGNIFICANT ~~WITH MITIGATION~~"
Alberhill	4.6.5.2	4.6-22	Line 4 under heading Construction states: "Although there is a risk of an earthquake occurring in the area, the chance of an earthquake occurring during the 28-month construction period is low. However, such an event would expose construction workers on site to seismic hazards. This impact would be potentially significant. MM GE-1 would ensure that, prior to the start of construction, construction personnel receive training about seismic risks and the applicant's safety guidelines in the event of an earthquake and that workers follow the guidelines during construction. Impacts would be less than significant with implementation of MM GE-1."	To be consistent with the seismic training added to Project Commitment B, SCE suggests the following revision: "Although there is a risk of an earthquake occurring in the area, the chance of an earthquake occurring during the 28-month construction period is low. However, such an event would expose construction workers on site to seismic hazards. This impact would be potentially significant. Project Commitment B ~~MM GE-1~~ would ensure that, prior to the start of construction, construction personnel receive training about seismic risks and the applicant's safety guidelines in the event of an earthquake and that workers follow the guidelines during construction. Impacts would be less than significant ~~with implementation of MM GE-1~~."
Alberhill	4.6.5.2	4.6-22	Line 30 under heading Mitigation Measure states: "MM GE-1: Seismic Safety Training."	To be consistent with the seismic training added to Project Commitment B, SCE suggests the following revision: ~~MM GE-1: Seismic Safety Training.~~
Alberhill	4.6.5.2	4.6-22	Line 32 under heading Mitigation Measure states: "Impact GE-2 (ASP): Result in substantial soil erosion or the loss of topsoil. LESS THAN SIGNIFICANT WITH MITIGATION"	SCE suggests the following edits: Impact GE-2 (ASP): Result in substantial soil erosion or the loss of topsoil. LESS THAN SIGNIFICANT ~~WITH MITIGATION~~
Alberhill	4.6.5.2	4.6-23	Line 14 under heading Construction states: "MM BR-15 would require implementation of certain erosion BMPs during construction as part of the SWPPP developed for the proposed project. Impacts from construction of the 500-kV	This is a regulatory requirement not a mitigation measures. Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is required. Please modify as follows:

Project	Section	Page	DEIR Language	SCE Recommended Language
			transmission line, 115-kV subtransmission line, and fiber optic line would be less than significant after implementation of MM BR-15."	"~~MM BR-15 would require implementation of certain erosion BMPs during construction as part of the SWPPP developed for the proposed project. Impacts from construction of the 500-kV transmission line, 115-kV subtransmission line, and fiber optic line would be less than significant after implementation of MM BR-15~~. The erosion potential would be considered when developing BMPs included in the SWPPP. In addition, soil exposure to erosion would be temporary and stabilized following the completion of construction. Because impacts to erosion would be temporary and controlled through the use of BMPs, impacts from construction of the 500-kV transmission line, 115-kV subtransmission line, and fiber optic line would be less than significant."
Alberhill	4.6.5.2	4.6-23	Line 35 under heading Construction states: To address these remaining impacts, MM BR-15 would require implementation of-certain erosion BMPs during construction as part of the SWPPP developed for the proposed project. Impacts from substation construction under Import Soil Option 2 would be less than significant after implementation of MM BR-15."	This is a regulatory requirement not a mitigation measures. Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is required. Please modify as follows: ~~To address these remaining impacts, MM BR-15 would require implementation of certain erosion BMPs during construction as part of the SWPPP developed for the proposed project. Impacts from substation construction under Import Soil Option 2 would be less than significant after implementation of MM BR-15.~~ The erosion potential would be considered when developing BMPs included in the SWPPP. In addition, soil exposure to erosion would be temporary and stabilized following the completion of construction. Because impacts to erosion would be temporary and controlled through the use of BMPs, impacts under Import Soil Option 2 would be less than significant."
Alberhill	4.6.5.2	4.6-24	Line 3 under heading Construction states: "If Import Soil Option 1 were implemented, these Project Commitments would also cover activities at the Import Soil Source Area. Project Commitments A and D would not address impacts during construction, and Project E would address erosion	This is a regulatory requirement not a mitigation measures. Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is required. Please modify as follows:

Project	Section	Page	DEIR Language	SCE Recommended Language
			only from grading activities. Impacts would remain significant. MM BR-15 would require implementation of certain erosion BMPs during construction as part of the SWPPP developed for the proposed project. Impacts would be less than significant after implementation of MM BR-15."	"If Import Soil Option 1 were implemented, these Project Commitments would also cover activities at the Import Soil Source Area. Project Commitments A and D would not address impacts during construction, and Project E would address erosion only from grading activities. Impacts would remain significant. ~~MM BR-15 would require implementation of certain erosion BMPs during construction as part of the SWPPP developed for the proposed project. Impacts would be less than significant after implementation of MM BR-15.~~ The erosion potential would be considered when developing BMPs included in the SWPPP. In addition, soil exposure to erosion would be temporary and stabilized following the completion of construction. Because impacts to erosion would be temporary and controlled through the use of BMPs, impacts under Import Soil Option 1 would be less than significant."
Alberhill	4.6.5.2	4.6-24	Line 14 under heading Mitigation Measure states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill	4.6.5.2	4.6-25	Line 46 under heading Impact GE-5 (ASP) states: "The soils present at the proposed Alberhill Substation site are sandy and should accommodate septic system installation (Table 4.6-2). There is a possibility that the soil s may be inadequate to support a septic system, which would be a potentially significant impact. The applicant would conduct a geotechnical investigation according to Project Commitment F, which would include a soils investigation."	As stated in the project description, page 2-39, line 35: "A new septic system or holding tank would be installed…" The dual design option should be reflected in connection with the soil's potential inadequacy to support a septic system. Please include the conditional statement listed below. "The soils present at the proposed Alberhill Substation site are sandy and should accommodate septic system installation (Table 4.6-2). There is a possibility that the soil s may be inadequate to support a septic system, which would be a potentially significant impact. If a septic system is installed, the ~~The~~ applicant would conduct a geotechnical investigation according to Project Commitment F, which would include a soils investigation."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	Table 4.7.1	4.7-1	Table 4.7.1 Principal Greenhouse Gases Contributing to Climate Change in Column Greenhouse Gas references "Hydrocarbons" **Table 4.7-1 Princip** **Greenhouse Gas** Carbon dioxide Methane Nitrous oxide Sulfur hexafluoride Perfluorocarbons Hydrocarbons	SCE suggests the following edits: **Table 4.7-1 Princip** **Greenhouse Gas** Carbon dioxide Methane Nitrous oxide Sulfur hexafluoride Perfluorocarbons ~~Hydrocarbons~~ Hydrofluorocarbons
Alberhill/ Valley-Ivyglen	4.7.2.3	4.7-6	Line 33 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with

Project	Section	Page	DEIR Language	SCE Recommended Language
				local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Alberhill/ Valley-Ivyglen	4.7.2.3	4.7-8		Please include a General Plan discussion for the City of Orange and its respective local regulations on GHGs. City of Orange The City of Orange General Plan and Natural Resources Element (City of Orange 2010) identifies the following policies applicable to GHGs: • GOAL 3.0: Prepare for and adapt to the effects of climate change and promote practices that decrease the City's contribution to climate change. • Policy 3.1: Evaluate the potential effects of climate change on the City's human and natural systems and prepare strategies that allow the City to appropriately respond and adapt. • Policy 3.2: Develop and adopt a comprehensive strategy to reduce greenhouse gasses (GHGs) within Orange by at least 15 percent from current levels by 2020.
Valley-Ivyglen	4.7.4.2	4.7-9	Line 34 under the heading Impact GHG-1 (VIG), states: "Approximately 8,342 $MTCO_2e$ would be generated by construction activities. Amortized over a 30-year period, construction emissions would be approximately 278 $MTCO_2e$ per year (Table 4.7-3)."	SCE suggests the following edits: "Approximately ~~8,342~~ 8,445 $MTCO_2e$ would be generated by construction activities. Amortized over a 30-year period, construction emissions would be approximately ~~278~~ 282 $MTCO_2e$ per year (Table 4.7-3)."
Valley-Ivyglen	4.7.4.2	4.7-11	Table 4.7-5 Valley-Ivyglen Project Conformity with Plans, Policies and Regulations. The consistency analysis column for the Western Riverside Council of Governments Subregional Climate Action Plan states:	For consistency with the Project Description, SCE suggests the following edits: "During construction of the proposed Valley–Ivyglen Project, approximately 56 ~~36~~ million gallons of water would be required. The project would obtain water from an local water agency

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td></td><td></td><td></td><td>“During construction of the proposed Valley–Ivyglen Project, approximately 36 million gallons of water would be required. The project would obtain water from an local water agency subject to the local jurisdiction’s per-capita water use in compliance with the SB X7-7 requirements. Therefore, the project is consistent with Measure SR-14 of this plan.”</td><td>subject to the local jurisdiction’s per-capita water use in compliance with the SB X7-7 requirements. Therefore, the project is consistent with Measure SR-14 of this plan.”</td></tr>
<tr><td>Alberhill</td><td>4.7.5.2</td><td>4.7-13</td><td>Under Table 4.7-6, Estimated Greenhouse Gas Emissions from Construction of the Proposed Alberhill Project states:

Table 4.7-6 Estimated Greenhouse Gas Emissions from Construction of the Proposed Alberhill Project
<table><tr><th rowspan="3">Proposed Alberhill Project Component</th><th colspan="4">Construction GHG Emissions ($MTCO_2e$)</th></tr><tr><th colspan="2">Conventional Method</th><th colspan="2">Helicopter Construction</th></tr><tr><th>Import Soil Option 1</th><th>Import Soil Option 2</th><th>Import Soil Option 1</th><th>Import Soil Option 2</th></tr><tr><td>Total emissions</td><td>5,122</td><td>5,116</td><td>5,330</td><td>5,325</td></tr><tr><td>Amortized (30-year period)</td><td>171</td><td>171</td><td>178</td><td>178</td></tr><tr><td>CPUC-Applied SCAQMD Threshold</td><td>10,000</td><td>10,000</td><td>10,000</td><td>10,000</td></tr><tr><td>Exceeds Threshold (Yes/No)</td><td>No</td><td>No</td><td>No</td><td>No</td></tr></table></td><td>Under Table 4.7-6, Estimated Greenhouse Gas Emissions from Construction of the Proposed Alberhill Project, the values for options 1 and 2 have been switched. The total emissions should be shown as follows:

<table><tr><td rowspan="3">Proposed Alberhill Project Components</td><td colspan="4">Construction GHG Emissions (MTCO2e)</td></tr><tr><td colspan="2">Conventional Method</td><td colspan="2">Helicopter Construction</td></tr><tr><td>Import Soil-Option 1</td><td>Import Soil-Option 2</td><td>Import Soil-Option 1</td><td>Import Soil-Option 2</td></tr><tr><td>Total Emissions</td><td>~~5,122~~5,116</td><td>~~5,116~~5,122</td><td>~~5,330~~ 5,325</td><td>~~5,325~~ 5,330</td></tr></table></td></tr>
<tr><td>Alberhill</td><td>4.7.5.2</td><td>4.7-12</td><td>Line 24 under heading Construction states:

“Emissions are detailed in Table 4.7-6. Based on the proposed construction equipment and vehicle use, it is estimated that approximately 5,122 MTCO2e would be generated from all project construction activities under Import Soil Option 1 using the conventional method for 500-kV transmission line construction, and total GHG emissions would increase by 4 percent (5,330 MTCO2e) if the helicopter construction method is used. The increased emissions would be due to greater helicopter use under the helicopter construction method when compared to</td><td>For consistency with the analyses found in Appendix B, Greenhouse Gas Calculations, as the values for options 1 and 2 have been switched. SCE suggests the following edits:

“Emissions are detailed in Table 4.7-6. Based on the proposed construction equipment and vehicle use, it is estimated that approximately 5,116 ~~5,122~~ MTCO2e would be generated from all project construction activities under Import Soil Option 1 using the conventional method for 500-kV transmission line construction, and total GHG emissions would increase by 4 percent (5,330 MTCO2e) if the helicopter construction method is</td></tr>
</table>

Project	Section	Page	DEIR Language	SCE Recommended Language
			the conventional method. Approximately 5,116 MTCO2e would be generated under Import Soil Option 2 using the conventional construction method for 500-kV transmission line construction, with a similar 4 percent increase in total GHG emissions if the helicopter construction method is used."	used. The increased emissions would be due to greater helicopter use under the helicopter construction method when compared to the conventional method. Approximately 5,122 ~~5,116~~ MTCO2e would be generated under Import Soil Option 2 using the conventional construction method for 500-kV transmission line construction, with a similar 4 percent increase in total GHG emissions if the helicopter construction method is used."
Alberhill	4.7.5.2	4.7-15	Table 4.7-8 Alberhill Project Conformity with Plans, Policies and Regulations in the Consistency Analysis column for the Western Riverside Council of Governments Subregional Climate Action Plan states: "Construction of the Alberhill Project would require approximately 39 million gallons of water."	For consistency with the Project Description, SCE suggests the following edits: "Construction of the Alberhill Project would require approximately 55 ~~39~~ million gallons of water."
Alberhill/ Valley-Ivyglen	4.8.1	4.8-1	Line 22 under heading Environmental Setting states: "The term hazardous material is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant current or potential hazard to human health and safety or to the environment (California Health and Safety Code, Chapter 6.95, Section 25501(o))."	SCE suggests the following edits: "The term hazardous material is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant current or potential hazard to human health and safety or to the environment (California Health and Safety Code, Chapter 6.95, Section 25501~~(o))~~(n)(1))."
Valley-Ivyglen	4.8.1.1	4.8-3	Line 29 under heading Environmental Site Assessments states: "However, the applicant would perform Phase I ESAs for the new ROW once acquired. Similar to the proposed Valley–Ivyglen segments, it is not anticipated that hazardous wastes or soil contaminated with hazardous materials would be encountered along the proposed Alberhill 115-kV subtransmission segments. The applicant does not yet own the property proposed for siting the Alberhill 500-kV transmission lines. However, the applicant would perform Phase I ESAs and any subsequent ESAs when acquiring property in fee or in easement."	SCE suggests the following edits: "However, the applicant would perform Phase I ESAs for the new ROW prior to acquisition ~~once acquired~~. Similar to the proposed Valley–Ivyglen segments, it is not anticipated that hazardous wastes or soil contaminated with hazardous materials would be encountered along the proposed Alberhill 115-kV subtransmission segments. The applicant does not yet own the property proposed for siting the Alberhill 500-kV transmission lines. However, the applicant would perform Phase I ESAs and any subsequent ESAs prior to ~~when~~ acquiring property in fee or in easement."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.8.1.6	4.8-6 and 4.8-8	Line 21 under heading Electromagnetic Fields states: 4.8.1.6 Electromagnetic Fields EMFs occur both naturally and as a result of human activity across a broad electrical spectrum. Naturally occurring EMFs are caused by the weather and the earth's geomagnetic field. The fields caused by human activity result from technological application of the electromagnetic spectrum for uses such as communications, appliances, and the generation, transmission, and local distribution of electricity. After several decades of study regarding potential public health and safety risks associated with EMF from power lines, research results remain inconclusive. In 1993, the California Public Utilities Commission (CPUC) implemented decision D.93 11-013, which requires utilities to use "low-cost or no cost" EMF reduction measures for EMFs associated with electrical facilities requiring certification under CPUC GO 131-D. The decision directed utilities to use a 4 percent benchmark for low-cost measures. The applicant included a Field Management Plan as part of its applications for the proposed projects that describes the EMF reduction measures that would be part of the proposed projects. This decision also implemented a number of EMF measurement, research, and education programs. The CPUC did not adopt any specific numerical limits on or regulation of EMF levels related to electric power facilities. The CPUC's January 27, 2006, decision (D.06-01-042) affirmed the 1993 decision on the low-cost/no cost policy to mitigate EMF exposure for new utility transmission and substation projects. Additionally, the 2006 decision directs the CPUC's Energy Division to pursue and review all available studies regarding EMF and to review scientific information and report on new findings. The CPUC has been unable to determine whether there is a significant scientifically verifiable relationship between EMF exposure and negative health consequences, and no change to the CPUC EMF policy has been made to date. The CPUC will	Suggest to relocate the EMF section 4.8.1.6 to Project Description Section 2.5 (as done on other project EIRs, such as Mesa Substation, Banducci and West of Devers). There is no established adverse health effects of EMF even after 40+ years of research. Therefore EMF is not a CEQA consideration, and it is inappropriate to have the EMF section in the Hazard and Hazardous Materials portion of the EIR. Therefore, SCE suggests the following edits: ~~4.8.1.6 Electromagnetic Fields~~ ~~EMFs occur both naturally and as a result of human activity across a broad electrical spectrum. Naturally occurring EMFs are caused by the weather and the earth's geomagnetic field. The fields caused by human activity result from technological application of the electromagnetic spectrum for uses such as communications, appliances, and the generation, transmission, and local distribution of electricity.~~ ~~After several decades of study regarding potential public health and safety risks associated with EMF from power lines, research results remain inconclusive. In 1993, the California Public Utilities Commission (CPUC) implemented decision D.93 11-013, which requires utilities to use "low-cost or no cost" EMF reduction measures for EMFs associated with electrical facilities requiring certification under CPUC GO 131-D. The decision directed utilities to use a 4 percent benchmark for low-cost measures. The applicant included a Field Management Plan as part of its applications for the proposed projects that describes the EMF reduction measures that would be part of the proposed projects. This decision also implemented a number of EMF measurement, research, and education programs. The CPUC did not adopt any specific numerical limits on or regulation of EMF levels related to electric power facilities.~~ ~~The CPUC's January 27, 2006, decision (D.06-01-042) affirmed the 1993 decision on the low-cost/no cost policy to mitigate EMF exposure for new utility transmission and substation projects.~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			reconsider its EMF policies and open a new rulemaking, as necessary, if new findings indicate negative EMF health impacts. At present, the CPUC does not consider EMFs, in the context of the California Environmental Quality Act (CEQA), to be an environmental impact because there is no agreement among scientists that EMFs create a potential health risk and because CEQA does not define or adopt standards for defining any potential risk from EMFs. Therefore, EMFs are not addressed in the Environmental Impacts and Mitigation Measures section of this document. For further information about EMFs and CPUC guidelines, refer to the CPUC's web page: http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Fields.	~~Additionally, the 2006 decision directs the CPUC's Energy Division to pursue and review all available studies regarding EMF and to review scientific information and report on new findings. The CPUC has been unable to determine whether there is a significant scientifically verifiable relationship between EMF exposure and negative health consequences, and no change to the CPUC EMF policy has been made to date. The CPUC will reconsider its EMF policies and open a new rulemaking, as necessary, if new findings indicate negative EMF health impacts.~~ ~~At present, the CPUC does not consider EMFs, in the context of the California Environmental Quality Act (CEQA), to be an environmental impact because there is no agreement among scientists that EMFs create a potential health risk and because CEQA does not define or adopt standards for defining any potential risk from EMFs. Therefore, EMFs are not addressed in the Environmental Impacts and Mitigation Measures section of this document. For further information about EMFs and CPUC guidelines, refer to the CPUC's web page: http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Fields.~~
Alberhill/ Valley-Ivyglen	4.8.2.3	4.8-17	Line 8 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over

Project	Section	Page	DEIR Language	SCE Recommended Language
				the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen & Alberhill	4.8.2.3	4.8.17	Line 10 under heading Regional Water Quality Control Board and Stormwater Pollution Prevention Plans states: "Under the National Pollutant Discharge Elimination System, California's Regional Water Quality Control Boards require a Construction Activities Storm Water General Permit (Order 99-08-DWQ) for storm water discharges associated with any construction activity, including clearing, grading, excavation reconstruction, and dredge and fill activities that results in the disturbance of at least 1 acre of total land area."	SCE suggests the following revisions: "Under the National Pollutant Discharge Elimination System, California's Regional Water Quality Control Boards require a Construction Activities Storm Water General Permit (Order 99-08-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) for storm water discharges associated with any construction activity, including clearing, grading, excavation reconstruction, and dredge and fill activities that results in the disturbance of at least 1 acre of total land area."
Valley-Ivyglen	4.8.4.1	4.8-22	Line 39 under heading Project Commitment B states: "Project Commitment B: Worker Environmental Awareness Plan: Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission. A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any site-specific biological or cultural resource protective measures and project mitigation measures. All construction personnel would also receive instruction on site-specific dust control, cultural resources identification, contaminant reduction practices, spill prevention and response procedures, emergency procedures, hazardous material safety, incident reporting, Best Management Practices, individual worksite responsibilities and legal requirements."	Per SCE's suggested edits to Project Commitment B, SCE suggests the following edits: "Project Commitment B: Worker Environmental Awareness Plan: Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission. A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any site-specific biological or cultural resource protective measures and project mitigation measures. All construction personnel would also receive instruction on site-specific dust control, cultural resources identification, contaminant reduction practices, spill prevention and response procedures, emergency procedures, hazardous material safety, incident reporting, Best Management Practices, individual worksite responsibilities and legal requirements. • A list of phone numbers of the applicant's personnel (i.e., archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator);

Project	Section	Page	DEIR Language	SCE Recommended Language
				• Instruction on the South Coast Air Quality Management District Rule 403 for control of dust; • Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator; • Instruction on washing the wheels, tracks, and underbodies of construction vehicles to minimize the spread of invasive species; • Instruction on individual responsibilities under the CWA, the Storm Water Pollution Prevention Plan (SWPPP) for the proposed projects, site-specific Best Management Practices (BMPs), and the location of Material Safety Data Sheets for the proposed projects; • Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination; • Instructions to follow worker safety guidelines and policies in the event of an earthquake; • A copy of the truck routes to be used for material delivery; and • Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed projects.”
Valley-Ivyglen	4.8.4.1	4.8-23	Line 13 under heading Project Commitment C states: “If chemicals are detected in the soil samples at concentrations above action levels, the applicant would avoid the contaminated soil or work with the property owner to remove the contaminated soil. The results of this study would be applied to final engineering designs for the proposed projects. The information collected would be used to determine final TSP foundation designs. In addition, the proposed Alberhill Substation would be located in an area susceptible to earthquakes. The applicant would design the proposed substation consistent with the Institute	For consistency with Table 2-12, SCE suggests the following edits: “If chemicals are detected in the soil samples at concentrations above acceptable levels ~~action~~ levels, the applicant would avoid the above threshold ~~contaminated~~ soil or work with the property owner to remove the contaminated soil. The results of this study would be applied to final engineering designs for the proposed projects. The information collected would be used to determine final TSP foundation designs. In addition, the proposed Alberhill Substation would be located in an area susceptible to

Project	Section	Page	DEIR Language	SCE Recommended Language
			of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations."	earthquakes. The applicant would design the proposed substation consistent with the applicable federal, state, and local codes, including the Institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations."
Valley-Ivyglen	4.8.4.1	4.8-24	Line 33 under heading Impact HZ-1 (VIG) states: "Implementation of MM BR-15 would require the applicant to perform vehicle maintenance activities at least 150 feet (or as specified by agency permits) from all aquatic resources and would require immediate cleanup of hazardous materials spills."	This is a regulatory requirement not a mitigation measure. Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is required. Please modify as follows: "If minor spills or drips occur during construction activities, any fluid or impacted soil would be cleaned up immediately, in accordance with the Proposed Project's Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would provide cleanup requirements for any incidental spills or other potential releases of hazardous materials. With implementation of the SWPPP, all impacts due to accidental spills or releases would be less than significant. ~~Implementation of MM BR-15 would require the applicant to perform vehicle maintenance activities at least 150 feet (or as specified by agency permits) from all aquatic resources and would require immediate cleanup of hazardous materials spills.~~"
Valley-Ivyglen	4.8.4.2	4.8-25	Line 1 under heading Impact HZ-1 (VIG) states: "MM HZ-2 would require the applicant to develop a Contaminated Soil/Groundwater Contingency Plan, which would define procedures for soil and groundwater testing if unanticipated contamination is encountered."	SCE suggests the following edits: MM HZ-2 would require the applicant to develop a Contaminated Soil/Groundwater Contingency Plan, which would define procedures for soil and groundwater testing if ~~unanticipated~~ contamination is encountered.
Valley-Ivyglen	4.4.8.2	4.8-25	Line 13 under heading Impact HZ-1 (VIG) states: "The SWPPP would require that the location of hazardous materials be identified and protective measures, notifications, and cleanup requirements for spills of hazardous materials to be developed. Impacts may be significant related to stormwater without implementation of specific measures. MM BR-15	SCE suggests the following edits: The SWPPP would require that the location of hazardous materials be identified and protective measures, notifications, and cleanup requirements for spills of hazardous materials to be developed, therefore impacts would be less than significant. ~~Impacts may be significant related to stormwater without~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			outlines minimum BMPs that must be included in the project SWPPP."	~~implementation of specific measures. MM BR-15 outlines minimum BMPs that must be included in the project SWPPP~~.
Valley-Ivyglen	4.4.8.2	4.8-25	Line 18 under the heading Impact HZ-1 (VIG) states: "In summary, implementation of Project Commitments B and F in addition to compliance with applicable laws and regulations would reduce impacts from the routine use, transport, and disposal of hazardous materials, but impacts would remain significant. Implementation of MM HZ-1, MM HZ-2, MM BR-15, and MM WQ-1 would reduce impacts under this criterion to less than significant levels."	SCE suggests the following edits: "In summary, implementation of Project Commitments B and F in addition to compliance with applicable laws and regulations would reduce impacts from the routine use, transport, and disposal of hazardous materials, but impacts would remain significant. Implementation of MM HZ-1, MM HZ-2, ~~MM BR-15,~~ and MM WQ-1 would reduce impacts under this criterion to less than significant levels."
Valley-Ivyglen	4.4.8.2	4.8-25	Line 23 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill/ Valley-Ivyglen	4..8.4.2	4.8-26	Line 26 under heading Mitigation Measures states: "MM HZ-1: Hazardous Materials Management. Prior to construction, the applicant shall prepare a hazardous materials management, handling, transport, storage, disposal, and emergency response plan for project construction, operation, and maintenance, following the requirements of applicable federal, state, and local regulations. Unless otherwise implemented prior to construction in accordance with plans required by the Riverside County Hazardous Materials Management Division, the plan includes the following: 1. Train project personnel in appropriate work practices including spill prevention and response measures. 2. Contain all hazardous materials at work sites and properly dispose of all such materials. a. Hazardous materials shall be stored on pallets within fenced and secured areas and protected from exposure to weather. b. Fuels and lubricants shall be stored only at designated staging areas.	SCE suggests the removal of the following section MM HZ-1 due to the following reasons: Mitigation Measure MM HZ-1 would be implemented under the Clean Water Act Section 402 Construction General Permit (CGP Order 99-08-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) and the required Project SWPPP for storm water and non-storm water discharges associated with construction activities. Items No. 2-8 under MM HZ-1 would be implemented through the following BMPs selected from California Stormwater BMP Handbook; WM-1 Material and Delivery Storage, WM-4 Spill Prevention and Control, WM-5 Solid Waste Management, WM-6 Hazardous Waste Management, WM-8 Concrete Waste Management, NS-9 Vehicle and Equipment Fueling and NS-10-Vehicle and Equipment Maintenance. Listed item No. 1 would be covered under SWPPP and WEAP training prior to the construction start. In addition, any hazardous waste generated as a result of this project will be managed through the applicant's hazardous waste transporter and disposal contractor, Clean Harbors Environmental Services, Inc. Federal or State EPA

Project	Section	Page	DEIR Language	SCE Recommended Language
			3. Maintain hazardous material spill kits for small spills at all active work sites and staging areas. 4. Thoroughly clean up all spills as soon as they occur. 5. Store sorbent and barrier materials at the Alberhill Substation site and all construction staging areas, including staging areas used during activities for decommissioning of the Alberhill Substation. Sorbent and barrier materials shall be used to contain runoff from contaminated areas and from accidental releases of oil or other potentially hazardous materials to prevent the runoff from entering the storm drainage system. 6. Perform all routine equipment maintenance at a shop or at the staging area and recover and dispose of wastes in an appropriate manner. 7. Monitor and remove any vehicles with chronic or continuous leaks from use and complete repairs before returning them to operation. 8. Store shovels and drums at the staging area. If small quantities of soil become contaminated, use shovels to collect the soil and store in drums before proper offsite disposal. Large quantities of contaminated soil may be collected using heavy equipment and stored in drums or other suitable containers prior to disposal. Should contamination occur adjacent to staging areas because of runoff, shovels and/or heavy equipment shall be used to collect the contaminated material. The applicant shall submit the plan to CPUC for review and approval at least 60 days prior to the start of construction. The applicant shall implement the plan during construction, operation, and maintenance of the projects."	Identification Numbers for generating hazardous waste will be obtained if necessary. Non-hazardous waste will be transported by applicant-approved transporters and disposed at El Sobrante and Badlands Landfills, as detailed in Section 4.13, Public Services and Utilities. ~~MM HZ-1: Hazardous Materials Management. Prior to construction, the applicant shall prepare a hazardous materials management, handling, transport, storage, disposal, and emergency response plan for project construction, operation, and maintenance, following the requirements of applicable federal, state, and local regulations. Unless otherwise implemented prior to construction in accordance with plans required by the Riverside County Hazardous Materials Management Division, the plan includes the following:~~ 1. ~~Train project personnel in appropriate work practices including spill prevention and response measures.~~ 2. ~~Contain all hazardous materials at work sites and properly dispose of all such materials.~~ ~~a. Hazardous materials shall be stored on pallets within fenced and secured areas and protected from exposure to weather.~~ ~~b. Fuels and lubricants shall be stored only at designated staging areas.~~ ~~3. Maintain hazardous material spill kits for small spills at all active work sites and staging areas.~~ ~~4. Thoroughly clean up all spills as soon as they occur.~~ ~~5. Store sorbent and barrier materials at the Alberhill Substation site and all construction staging areas, including staging areas used during activities for decommissioning of the Alberhill Substation. Sorbent and barrier materials shall be used to contain runoff from contaminated areas and from accidental releases of oil or other potentially hazardous materials to prevent the runoff from entering the storm drainage system.~~

Project	Section	Page	DEIR Language	SCE Recommended Language
				~~6. Perform all routine equipment maintenance at a shop or at the staging area and recover and dispose of wastes in an appropriate manner.~~ ~~7. Monitor and remove any vehicles with chronic or continuous leaks from use and complete repairs before returning them to operation.~~ ~~8. Store shovels and drums at the staging area. If small quantities of soil become contaminated, use shovels to collect the soil and store in drums before proper offsite disposal. Large quantities of contaminated soil may be collected using heavy equipment and stored in drums or other suitable containers prior to disposal. Should contamination occur adjacent to staging areas because of runoff, shovels and/or heavy equipment shall be used to collect the contaminated material.~~ ~~The applicant shall submit the plan to CPUC for review and approval at least 60 days prior to the start of construction. The applicant shall implement the plan during construction, operation, and maintenance of the projects.~~
Alberhill/ Valley-Ivyglen	4..8.4.2	4.8-26	Line 15 under heading Mitigation Measures states: "MM HZ-2: Contaminated Soil/Groundwater Contingency Plan. Prior to the start of construction, to the extent not otherwise included within plans required by the Riverside County Hazardous Materials Management Division, the applicant shall develop a Contaminated Soil/Groundwater Contingency Plan to address the unearthing or exposure of buried hazardous materials or contamination or contaminated groundwater during construction of the projects. The Plan shall detail steps that the applicant or its contractor will take to prevent the spread of contamination, the sampling necessary if contamination is discovered, and remedial action to be taken. The Plan, at minimum, shall include the following:	This portion of the measure is duplicative of MM WQ-4. SCE suggests deleting the following: MM HZ-2: Contaminated Soil/Groundwater Contingency Plan. Prior to the start of construction, to the extent not otherwise included within plans required by the Riverside County Hazardous Materials Management Division, the applicant shall develop a Contaminated Soil/Groundwater Contingency Plan to address the unearthing or exposure of buried hazardous materials or contamination or contaminated groundwater during construction of the projects. The Plan shall detail steps that the applicant or its contractor will take to prevent the spread of contamination, the sampling necessary if contamination is discovered, and remedial action to be taken. The Plan, at minimum, shall include the following:

Project	Section	Page	DEIR Language	SCE Recommended Language
			1. Contact information for federal, regional, and local agencies, the applicant's environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater, and licensed disposal facilities and haulers. 2. Procedures to minimize environmental impacts in the event that hazardous soils, contaminated groundwater, or other hazardous materials are encountered during construction including stopping work; securing and marking the contaminated area; preventing the spread of contamination; testing; primary, secondary, and final cleanup procedures; and proper disposal in accordance with applicable laws and regulations. 3. Training requirements for construction workers performing excavation activities including training on types of contamination including common contaminants (e.g., petroleum hydrocarbons, lead, mercury, and metals, asbestos, acetone, nitrate, semi-volatile organic compounds and volatile organic compounds (benzene), polychlorinated biphenyls, sanitary waste, and pesticides) and hazardous materials (as defined by the California Health and Safety Code) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). 4. Dewatering procedures including storage, testing, treatment, and disposal requirements and dewatering BMPs set forth in the applicant's Storm Water Pollution Prevention Plan."	1. Contact information for federal, regional, and local agencies, the applicant's environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater, and licensed disposal facilities and haulers. 2. Procedures to minimize environmental impacts in the event that hazardous soils, contaminated groundwater, or other hazardous materials are encountered during construction including stopping work; securing and marking the contaminated area; preventing the spread of contamination; testing; primary, secondary, and final cleanup procedures; and proper disposal in accordance with applicable laws and regulations. 3. Training requirements for construction workers performing excavation activities including training on types of contamination including common contaminants (e.g., petroleum hydrocarbons, lead, mercury, and metals, asbestos, acetone, nitrate, semi-volatile organic compounds and volatile organic compounds (benzene), polychlorinated biphenyls, sanitary waste, and pesticides) and hazardous materials (as defined by the California Health and Safety Code) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). ~~4. Dewatering procedures including storage, testing, treatment, and disposal requirements and dewatering BMPs set forth in the applicant's Storm Water Pollution Prevention Plan.~~"
Valley-Ivyglen	4.8.4.2	4.8-27	Line 35 under the heading Impact HZ-2 (VIG) states: "Compliance with applicable regulation, Project Commitment B, and Project Commitment F would reduce the risk but not prevent significant impacts that may still occur from upset and accident conditions involving the release of hazardous materials. The implementation of a site-specific hazardous materials management plan (MM HZ-1), a contaminated soil/groundwater contingency plan (MM HZ-2), an investigation of public and private underground facilities (MM HZ-3), a SWPPP (MM BR-15), and blasting management plan (MM WQ-1) would further prevent the potential for upset and accident conditions and would reduce impacts under this criterion to less than significant levels."	SCE suggests the following edits: "Compliance with applicable regulation, Project Commitment B, and Project Commitment F would reduce the risk but not prevent significant impacts that may still occur from upset and accident conditions involving the release of hazardous materials. The implementation of a site-specific hazardous materials management plan (MM HZ-1), a contaminated soil/groundwater contingency plan (MM HZ-2), an investigation of public and private underground facilities ~~(MM HZ-3)~~, a SWPPP ~~(MM BR-15)~~, and blasting management plan (MM WQ-1) would further prevent the potential for upset and accident conditions and would

Project	Section	Page	DEIR Language	SCE Recommended Language
				reduce impacts under this criterion to less than significant levels."
Valley-Ivyglen	4.8.4.2	4.8-27	Line 44 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill and Valley-Ivyglen	4..8.4.2	4.8-28	Line 1 under heading Mitigation Measures states: "MM HZ-3: DigAlert. As part of the siting and engineering for the projects, the applicant shall precisely locate all underground natural gas lines that may be impacted. Prior to finalizing the engineering design, the applicant shall contact the Underground Service Alert of Southern California (DigAlert) to identify the exact locations of gas pipelines within the project area. In addition, prior to construction the applicant shall contact affected private landowners to determine if septic systems and associated leach fields as well as other underground facilities may be impacted by construction of the projects. Final engineering plans for the projects shall be designed to avoid damage to underground facilities, both public and private. The applicant shall immediately notify by telephone the owner of underground facilities that may have been damaged or dislocated during construction of the projects."	SCE will be in compliance with California Law Government Code 4216 (California's One Call Law) and will obtain DigAlert ticket number prior to digging activities. The regulations should not be listed as Mitigation Measures and therefore SCE suggests the following edits: ~~MM HZ-3: DigAlert. As part of the siting and engineering for the projects, the applicant shall precisely locate all underground natural gas lines that may be impacted. Prior to finalizing the engineering design, the applicant shall contact the Underground Service Alert of Southern California (DigAlert) to identify the exact locations of gas pipelines within the project area. In addition, prior to construction the applicant shall contact affected private landowners to determine if septic systems and associated leach fields as well as other underground facilities may be impacted by construction of the projects. Final engineering plans for the projects shall be designed to avoid damage to underground facilities, both public and private. The applicant shall immediately notify by telephone the owner of underground facilities that may have been damaged or dislocated during construction of the projects.~~
Valley-Ivyglen	4.8.4.2	4.8-28	Line 33 under heading Impact HZ-3 (VIG) states: "Implementation of MM HZ-1, MM HZ-2, MM HZ-3, MM BR-15, and MM WQ-1 would..."	SCE suggests the following edits: "Implementation of MM HZ-1, MM HZ-2, ~~MM HZ-3, MM BR-15,~~ and MM WQ-1 would..."
Valley-Ivyglen	4.8.4.2	4.8-28	Line 37 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) BestManagement Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill and Valley-Ivyglen	4..8.4.2	4.8-31	Line 24 under heading Mitigation Measure states: "MM HZ-4: Fire Control and Emergency Response. The applicant, in consultation with its contractors, shall develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies (e.g., flooding) during construction, operation, and maintenance of the projects. The plans and a record of contact and coordination with the fire departments with jurisdiction over each worksite shall be submitted to the CPUC for review and approval prior to start of construction. The plans shall describe fire prevention and response practices that the applicant and its contractors will implement to minimize the risk of fire, and in the event of fire or other emergencies, provide for immediate response. The site-specific plans shall specify that the applicant or its contractors will furnish supervision, labor, tools, equipment, and materials for the prevention of fire and extinguishing and controlling the spread of fires started as a result of project activities. During Construction: - The applicant or its contractors shall assign Fire Risk Managers who will be present at each worksite during construction activities, whose sole responsibility will be to monitor the contractor's fire-prevention activities, and who will have full authority to stop construction as needed to prevent fire hazards. The Fire Risk Managers shall: - Serve as liaisons to fire departments and act as a point of contact for fire departments in the event of fire or other emergency; - Manage the prevention, detection, control, and extinguishing of fires set accidentally as a result of construction activity; - Review site-specific fire control and emergency response plans with construction personnel prior to starting work at each project area;	SCE suggests the following edits: "MM HZ-4: Fire Control and Emergency Response. The applicant, in consultation with its contractors, shall develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies (e.g., flooding) during construction, ~~operation, and maintenance~~ of the projects. The plans and a record of contact and coordination with the fire departments with jurisdiction over each worksite shall be submitted to the CPUC for review and approval prior to start of construction. The plans shall describe fire prevention and response practices that the applicant and its contractors will implement to minimize the risk of fire, and in the event of fire or other emergencies, provide for immediate response. The site-specific plans shall specify that the applicant or its contractors will furnish supervision, labor, tools, equipment, and materials for the prevention of fire and extinguishing and controlling the spread of fires started as a result of project activities. During Construction: - The applicant or its designee ~~contractors~~ shall designate ~~assign~~ a full time Fire Risk Manager~~s~~ who will be present ~~at each worksite~~ during construction activities, whose sole responsibility will be to monitor the contractor's fire-prevention activities, and who will have full authority to stop construction as needed to prevent fire hazards. The Fire Risk Manager~~s~~ shall: - Serve as liaisons to fire departments and act as a point of contact for fire departments in the event of fire or other emergency; - Manage the prevention, detection, control, and extinguishing of fires set accidentally as a result of construction activity;

Project	Section	Page	DEIR Language	SCE Recommended Language
			Ensure that all construction personnel are trained in fire safety measures relevant to their responsibilities. At minimum, construction personnel shall be trained in fire and emergency reporting and incipient-stage fire prevention, control, and extinguishing (i.e., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus). Each member of the construction workforce shall be trained and equipped to extinguish small fires; - Be equipped with radio and cellular telephone access for the duration of each work day; - Ensure that all construction personnel are provided with operational radio and cellular telephone access at each worksite to allow for immediate reporting of fires or other emergencies and ensure that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each worksite; and - Maintain an updated key personnel and emergency services contact (telephone and email) list onsite and available to construction personnel. - Construction workers shall immediately report all fires to the nearest Fire Risk Manager. During All Project Phases: - Equipment installed and maintained as part of the project shall include: - Spark arresters that are in good working order and meet applicable regulatory standards for all internal combustion engines (both stationary and mobile); - Fire suppression equipment on all motorized vehicles that includes, at minimum, one shovel and one pressurized chemical fire extinguisher; - A fire extinguisher capable of extinguishing any equipment-caused fire on all heavy construction equipment; and - Portable communication devices (e.g., radios or cellular telephones) and communication protocols for project workers to coordinate with local agencies and emergency personnel in the event of fire or other emergencies.	- Review site-specific fire control and emergency response plans ~~with construction personnel~~ prior to starting work ~~at each project area~~; Ensure that all construction personnel are trained in fire safety measures relevant to their responsibilities. At minimum, construction personnel shall be trained in fire and emergency reporting and incipient-stage fire prevention, control, and extinguishing (i.e., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus). Each member of the construction workforce shall be trained and equipped to extinguish small fires; - Be equipped with radio and cellular telephone access for the duration of each work day; - Ensure that ~~all~~ construction personnel are provided with operational radio and cellular telephone access at each worksite to allow for immediate reporting of fires or other emergencies and ensure that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each worksite; and - Maintain an updated key personnel and emergency services contact (telephone and email) list onsite and available to construction personnel. - Construction workers shall immediately report all fires to the nearest Fire Risk Manager. During All Project Phases: - Equipment installed and maintained as part of the project shall include: ~~- Spark arresters that are in good working order and meet applicable regulatory standards for all internal combustion engines (both stationary and mobile);~~ -Fire suppression equipment <u>with each construction crew</u> ~~on all motorized vehicles~~ that includes, at minimum, one shovel and one pressurized chemical fire extinguisher

Project	Section	Page	DEIR Language	SCE Recommended Language
			- Measures to be undertaken by the applicant or its contractors shall include: - Prohibiting smoking during the operation of light or heavy construction equipment; in wildland areas; and within 30 feet of any area where combustible materials (e.g., fuels, gases, and solvents) are stored; - Limiting smoking to paved areas or areas cleared of all vegetation; - Posting no-smoking signs and fire rules on project bulletin boards, at contractor field offices, and in other areas visible to workers during fire season; - Maintaining all worksites in an orderly, safe, and clean manner. Maintaining staging areas and parking areas free of extraneous flammable materials. Removing all oily rags and used oil filters from worksites; - Confining hot-work activities (e.g., welding, brazing, soldering, grinding, and arc cutting) to cleared areas with a minimum 10-foot clearance radius measured from place of hot-work activity; - Ensuring an appropriate fire extinguisher is present before initiating each hot-work activity; Preventing vehicles with hot exhaust manifolds from idling on roads with combustible vegetation under the vehicles; - Ensuring all Blasting Plan (MM WQ-1) BMPs are followed, e.g., pre-blast and post-blast inspections; - Notifying the fire department with jurisdiction over the worksite in advance of all planned burning activities (e.g., to clear vegetation). Special care shall be taken to prevent damage to adjacent structures, trees, and vegetation during planned burning activities; and - Any additional fire prevention and detection measures to lower the risk of wildland fires. - Measures to be undertaken by the applicant or its contractors for days when the National Weather Service issues a Red Flag Warning for a project area shall include: - Abiding by all restrictions and requirements that may be imposed by fire departments during Red Flag Warning periods	- A fire extinguisher capable of extinguishing any equipment-caused fire on all heavy construction equipment; and - Portable communication devices (e.g., radios or cellular telephones) and communication protocols for project workers to coordinate with local agencies and emergency personnel in the event of fire or other emergencies. - Measures to be undertaken by the applicant or its contractors shall include: - Prohibiting smoking during the operation of light or heavy construction equipment; in wildland areas; and within 30 feet of any area where combustible materials (e.g., fuels, gases, and solvents) are stored; - Limiting smoking to paved areas or <u>areas designated for smoking that have been</u> cleared of all vegetation; - Posting no-smoking signs and fire rules on project bulletin boards, at contractor field offices, and in other areas visible to workers during fire season; - Maintaining all worksites in an orderly, safe, and clean manner. Maintaining staging areas and parking areas free of extraneous flammable materials. Removing all oily rags and used oil filters from worksites; - Confining hot-work activities (e.g., welding, brazing, soldering, grinding, and arc cutting) to cleared areas with a minimum 10-foot clearance radius measured from place of hot-work activity; - Ensuring an appropriate fire extinguisher is present before initiating each hot-work activity; - Preventing vehicles with hot exhaust manifolds from idling on roads with combustible vegetation under the vehicles; - Ensuring all Blasting Plan (MM WQ-1) BMPs are followed, e.g., pre-blast and post-blast inspections; ~~- Notifying the fire department with jurisdiction over the worksite in advance of all planned burning activities (e.g., to clear vegetation). Special care shall be taken to prevent damage to adjacent structures, trees, and vegetation during planned burning activities; and~~ ~~- Any additional fire prevention and detection measures to lower the risk of wildland fires.~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			(e.g., parking restrictions; road closures; and work activity and equipment use restrictions and requirements); and - Prohibiting smoking at all worksites."	- Measures to be undertaken by the applicant or its contractors for days when the National Weather Service issues a Red Flag Warning for a project area shall include: - Abiding by all restrictions and requirements that may be imposed by fire departments during Red Flag Warning periods (e.g., parking restrictions; road closures; and work activity and equipment use restrictions and requirements); and - Prohibiting smoking at all worksites."
Alberhill	4.8.5.1	4.8-33	Line 40 under heading Project Commitments (Alberhill Project) states: "Project Commitment A: Landscaping and Irrigation Plan: For the Alberhill Project, prior to the start of construction, the applicant would develop a Landscaping and Irrigation Plan for Alberhill Substation that is consistent with surrounding community standards. The applicant would consult with Riverside County about the plan and incorporate applicable County recommendations to the extent possible. Landscaping would be designed to filter views from the surrounding community and other potential sensitive receptors near the proposed substation and be consistent with the surrounding community. The landscape plan would include a plant species list and installation and construction requirements. The applicant would contract a landscape architect to complete the landscaping plan during final engineering for the Alberhill Project. Irrigation and landscaping installation would occur after construction of the substation perimeter wall, and water service has been established. During operations, the applicant would maintain the substation site pursuant to the Landscaping and Irrigation Plan and be responsible for upkeep as long as the applicant owns the property."	For consistency with Table 2-12, SCE suggests the following edits: "Project Commitment A: Landscaping and Irrigation Plan: For the Alberhill Project, ~~prior to the start of construction,~~ the applicant would develop a Landscaping and Irrigation Plan for Alberhill Substation road frontage only along Temescal Canyon Road, Concordia Ranch Road and Love Lane that is consistent with surrounding community standards, substation security and safety requirements. The applicant would consult with Riverside County about the plan and incorporate applicable County recommendations to the extent possible. Landscaping would be designed to filter views from the surrounding community and other potential sensitive receptors near the proposed substation and be consistent with the surrounding community. The landscape plan would include a plant species list and installation and construction requirements. The applicant would contract a landscape architect to complete the landscaping plan during final engineering for the Alberhill Project. Irrigation and landscaping installation would occur after construction of the substation perimeter wall subtransmission and transmission poles/towers erected, underground utility lines/cable ducts installed, and water service has been established. During operations, the applicant would maintain the substation site pursuant to the Landscaping and Irrigation Plan and be responsible for upkeep as long as the applicant owns the property."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	4.8.5.1	4.8-34	Line 26 under heading Project Commitment F states: "If chemicals are detected in the soil samples at concentrations above action levels, the applicant would avoid the contaminated soil or work with the property owner to remove the contaminated soil. The results of this study would be applied to final engineering designs for the proposed projects. The information collected would be used to determine final TSP foundation designs. In addition, the proposed Alberhill Substation would be located in an area susceptible to earthquakes. The applicant would design the proposed substation consistent with the Institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations."	For consistency with Table 2-12, SCE suggests the following edits: "If chemicals are detected in the soil samples at concentrations above acceptable levels ~~action~~ levels, the applicant would avoid the above threshold ~~contaminated~~ soil or work with the property owner to remove the contaminated soil. The results of this study would be applied to final engineering designs for the proposed projects. The information collected would be used to determine final TSP foundation designs. In addition, the proposed Alberhill Substation would be located in an area susceptible to earthquakes. The applicant would design the proposed substation consistent with the applicable federal, state, and local codes, including the Institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations."
Alberhill	4.8.5.2	4.8-36	Line 12 under heading Impact HZ-1 (ASP) states: "Implementation of MM BR-15 would require the applicant to perform vehicle maintenance activities at least 150 feet (or as specified by agency permits) from all aquatic resources and would require immediate cleanup of hazardous materials spills."	This is a regulatory requirement not a mitigation measures. Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is required. Please modify as follows: "If minor spills or drips occur during construction activities, any fluid or impacted soil would be cleaned up immediately, in accordance with the Proposed Project's Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would provide cleanup requirements for any incidental spills or other potential releases of hazardous materials. With implementation of the SWPPP, all impacts due to accidental spills or releases would be less than significant. ~~Implementation of MM BR-15 would require the applicant to perform vehicle maintenance activities at least 150 feet (or as specified by agency permits) from all aquatic resources and would require immediate cleanup of hazardous materials spills.~~"

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	4.8.5.2	4.8-36	Line 29 under heading Impact HZ-1 (ASP) states: "MM HZ-2 would require the applicant to develop a Contaminated Soil/Groundwater Contingency Plan, which would define procedures for soil and groundwater testing if unanticipated contamination is encountered."	SCE suggests the following edits: "MM HZ-2 would require the applicant to develop a Contaminated Soil/Groundwater Contingency Plan, which would define procedures for soil and groundwater testing if ~~unanticipated~~ contamination is encountered."
Alberhill	4.8.5.2	4.8-36	Line 37 under heading Impact HZ-1 (ASP) states: "However, implementation of MM HZ-1, MM HZ-2, and MM BR-15 would reduce impacts under this criterion to a less than significant level."	SCE suggests the following edits: "However, implementation of MM HZ-1, and MM HZ-2~~, and MM BR-15~~ would reduce impacts under this criterion to a less than significant level."
Alberhill	4.8.5.2	4.8-36	Line 41 under heading Impact HZ-1 (ASP) states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill	4.8.5.2	4.8-37	Line 15 under heading Impact HZ-2 (ASP) states: "…Board (MM BR-15). The applicant would also…"	SCE suggests the following edits: "…Board ~~(MM BR-15)~~. The applicant would also…"
Alberhill	4.8.5.2	4.8-38	Line 11 under heading Impact HZ-2 (ASP) states: "If chemicals are detected in the soil samples at concentrations above action levels, the applicant would avoid the contaminated soil or work with the property owner to remove it (Project Commitment F)."	For consistency with Table 2-12, SCE suggests the following edits: "If chemicals are detected in the soil samples at concentrations above acceptable ~~action~~ levels, the applicant would avoid the above threshold ~~contaminated~~ soil or work with the property owner to remove it (Project Commitment F)."
Alberhill	4.8.5.2	4.8-39	Line 1 under heading Impact HZ-2 (ASP) states: "implementation of a site-specific hazardous materials management plan (MM HZ-1), a SWPPP (BR-15),"	SCE suggests the following edits: "implementation of a site-specific hazardous materials management plan (MM HZ-1), a SWPPP ~~(BR-15)~~,"

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	4.8.5.2	4.8-39	Line 36 under heading Impact HZ-3 (ASP) states: "and F and implementation of MM HZ-1, MM HZ-2, MM HZ-3, and MM BR-15, in"	SCE suggests the following edits: "and F and implementation of MM HZ-1~~,~~ and MM HZ-2, ~~MM HZ-3, and MM BR-15,~~ in"
Alberhill	4.8.5.2	4.8-39	Line 41 under heading Impact HZ-3 (ASP) states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill/ Valley-Ivyglen	4.9.2.1	4.9-7	Line 33 under the heading "The Clean Water Act of 1972, as amended in 2002" states: "In California, 401 certification is granted by the Regional Water Quality Control Board (RWQCB) for projects that are located in a single region, or by the State Water Resources Control Board (SWRCB) for multi-regional projects. Portions of the projects would be located within the RWQCB's Central Region (Region 3) and within the Los Angeles Region (Region 4). Therefore, the SWRCB would be responsible for issuance of a 401 Water Quality Certification. Conditions placed on the issuance of a Section 401 certification by the SWRCB become part of the Section 404 permit issued by the USACE, and a Section 404 permit cannot be issued if Section 401 certification is denied."	SCE suggests the following edits: In California, 401 certification is granted by the Regional Water Quality Control Board (RWQCB) for projects that are located in a single region, or by the State Water Resources Control Board (SWRCB) for multi-regional projects. Portions of the projects would be located within the RWQCB's Santa Ana ~~Central~~ Region (Region~~3~~8) and within the ~~Los Angeles~~ San Diego Region (Region~~4~~9).However, no impacts to jurisdictional waters would occur within the San Diego Region portion. Therefore, the Santa Ana RW~~R~~QCB would be responsible for issuance of a 401 Water Quality Certification. Conditions placed on the issuance of a Section 401 certification by the ~~SW~~ RWQCB become part of the Section 404 permit issued by the USACE, and a Section 404 permit cannot be issued if Section 401 certification is denied.
Valley-Ivyglen/Alberhill	4.9.2.1	4.9-9	Line 1 under heading The Clean Water Act of 1972, as amended in 2002 states: "As authorized by Section 402 of the CWA, the SWRCB administers the statewide National Pollutant Discharge Elimination System (NPDES) Construction Storm Water General Permit (NPDES Permit, 2009-0009-DWQ as amended by 2010-0014-DWQ), which covers a variety of construction activities that could result in wastewater discharges. Under this system, the State issues project-level Construction General Permits for projects that disturb more than 1 acre of land. The SWRCB Construction General Permit process requires developers to	SCE suggests the following revision: "As authorized by Section 402 of the CWA, the SWRCB administers the statewide National Pollutant Discharge Elimination System (NPDES) Construction Storm Water General Permit (NPDES Permit, 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ), which covers a variety of construction activities that could result in wastewater discharges. Under this system, the State issues project-level Construction General Permits for projects that disturb ~~more than~~ 1 acre or greater of land. The SWRCB Construction General Permit process requires developers to notify the SWRCB of the

Project	Section	Page	DEIR Language	SCE Recommended Language
			notify the SWRCB of the construction activity by providing a Notice of Intent, developing a Storm Water Pollution Prevention Plan (SWPPP), and implementing water quality monitoring activities as required. The purpose of a SWPPP is to:"	construction activity by providing Permit Registration Documents (PRDs) which includes a Notice of Intent, developing a Storm Water Pollution Prevention Plan (SWPPP), ~~and~~ other compliance related documents required by this General Permit and implementing water quality monitoring activities as required. The purpose of a SWPPP is to:"
Alberhill/ Valley-Ivyglen	4.9.2.1	4.9-9	Line 18 under heading The Clean Water Act of 1972, as amended in 2002 states: "Identify a sampling and analysis strategy and sampling schedule for discharges from construction activity that discharge directly to a water body listed for impairment due to sedimentation, in accordance with Section 303(d) of the CWA; and"	Sampling requirements are dependent upon the risk level or type that the project is determined to fall under. This risk type and level are determined by both sediment and receiving water risk. If the risk level or type are determined to be a level or type 1 sampling will not be required unless a non-storm water discharge occurs and cannot be properly cleaned up prior to a rain event. SCE suggests the following edits: "Identify a sampling and analysis strategy ~~and sampling schedule~~ for discharges from construction activity in compliance with the requirements of the Construction General Permit. ~~that discharge directly to a water body listed for impairment due to sedimentation, in accordance with Section 303(d) of the CWA~~; ~~and~~"
Alberhill/ Valley-Ivyglen	4.9.2.1	4.9-9	Line 21 under heading The Clean Water Act of 1972, as amended in 2002 states: "Identify a sampling and analysis strategy and sampling schedule for discharges that have been discovered through visual monitoring to be potentially contaminated by pollutants not visually detectable in the runoff."	With the modification of the fifth bullet, SCE recommends deleting the following: "~~Identify a sampling and analysis strategy and sampling schedule for discharges that have been discovered through visual monitoring to be potentially contaminated by pollutants not visually detectable in the runoff~~."
Alberhill/ Valley-Ivyglen	4.9.2.2	4.9-9	Line 39 under the heading Porter-Cologne Water Quality Control Act (Porter-Cologne Act) states: "The Porter–Cologne Act (California Water Code, Division 7), passed in 1969, regulates surface water and groundwater quality in the state and also assigns to the SWRCB responsibility for implementing CWA Sections 401 (Water Quality Certification), 402 (NPDES), 303(d) (List of Impaired Water Bodies), and	The 401 and 303(d) are discussed in the Federal section, therefore SCE suggests the following edits: "The Porter–Cologne Act (California Water Code, Division 7) of 1967,Water Code Section 13000 et seq..~~passed in 1969,~~requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. ~~regulates surface water and groundwater quality in the state and also assigns to the SWRCB~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			305(b) (Report on the Quality of Waters in California), and the SWRCB has delegated the authority to the nine RWQCBs. The SWRCB and RWQCBs are responsible for issuing permits for certain point source discharges and for regulating construction and stormwater runoff. The RWQCBs regulate discharges to waters within their respective jurisdictions through administration of 46 NPDES permits, waste discharge requirements, and CWA Section 401 Water Quality Certifications. RWQCBs administer Section 401 water quality certifications to ensure that projects with federal 404 permits do not violate State water quality standards. The SWRCB has jurisdiction over depositing fill or dredging in "State Only Waters" and issues Waste Discharge Requirements for these projects. Construction projects may require RWQCB approval of a 401 Water Quality Certification, as well as Waste Discharge Requirements and/or a Low Threat Discharge Permit covering construction activities related to discharges from hydrostatic pipeline testing and construction dewatering. The SWRCB and RWQCBs are responsible for developing and implementing regional basin plans to regulate all pollutants or nuisance discharges that may affect either surface water or groundwater. Basin plans are prepared by the RWQCBs to establish water quality standards for both surface and groundwater bodies within their respective jurisdictions. Basin plans designate beneficial uses for surface and groundwater, set narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses, and describe implementation programs to protect all waters in the region. Under Section 303(d) of the CWA, the RWQCB develops a list of impaired water bodies in which water quality is impeding the attainment of beneficial uses."	~~responsibility for implementing CWA Sections 401 (Water Quality Certification), 402 (NPDES), 303(d) (List of Impaired Water Bodies), and 305(b) (Report on the Quality of Waters in California), and the SWRCB has delegated the authority to the nine RWQCBs. The SWRCB and RWQCBs are responsible for issuing permits for certain point source discharges and for regulating construction and stormwater runoff.~~ These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. ~~The RWQCBs regulate discharges to waters within their respective jurisdictions through administration of 46 NPDES permits, waste discharge requirements, and CWA Section 401 Water Quality Certifications.~~ ~~RWQCBs administer Section 401 water quality certifications to ensure that projects with federal 404 permits do not violate State water quality standards. The SWRCB has jurisdiction over depositing fill or dredging in "State Only Waters" and issues Waste Discharge Requirements for these projects. Construction projects may require RWQCB approval of a 401 Water Quality Certification, as well as Waste Discharge Requirements and/or a Low Threat Discharge Permit covering construction activities related to discharges from hydrostatic pipeline testing and construction dewatering.~~ The SWRCB and RWQCBs are responsible for developing and implementing regional basin plans to regulate all pollutants or nuisance discharges that may affect either surface water or groundwater. Basin plans are prepared by the RWQCBs to establish water quality standards for both surface and groundwater bodies within their respective jurisdictions. Basin plans designate beneficial uses for surface and groundwater, set narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses, and describe implementation programs to protect all waters in the region. Alberhill and Valley-Ivyglen are within the regions for the Water Quality Control Plan for the Santa Ana River Basin (SARWQCB, 1995) and the Water Quality Control Plan San

Project	Section	Page	DEIR Language	SCE Recommended Language
				Diego Basin (SDRWQCB, 1994). The basin plans are reviewed and updated on a regular basis as needed. ~~Under Section 303(d) of the CWA, the RWQCB develops a list of impaired water bodies in which water quality is impeding the attainment of beneficial uses.~~"
Alberhill/ Valley-Ivyglen	4.9.2.3	4.9-10	Line 23 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen	4.9.4.1	4.9-13	Line 8 under heading Project Commitments (Valley-Ivyglen Project) states: "Project Commitment B: Worker Environmental Awareness Plan. Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission (CPUC). A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any	Per SCE's suggested edits to Project Commitment B, SCE suggests the following edits: "Project Commitment B: Worker Environmental Awareness Plan. Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission (CPUC). A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any

Project	Section	Page	DEIR Language	SCE Recommended Language
			site-specific biological or cultural resource protective measures and project mitigation measures, all construction personnel would also receive the following: - A list of phone numbers of the applicant's personnel (i.e., archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator); - Instruction on the South Coast Air Quality Management District Rule 403 for control of dust; - Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator; - Instruction on washing the wheels, tracks, and underbodies of construction vehicles to minimize the spread of invasive species; - Instruction on individual responsibilities under the CWA, the Storm Water Pollution Prevention Plan (SWPPP) for the proposed projects, site-specific Best Management Practices (BMPs), and the location of Material Safety Data Sheets for the proposed projects; - Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination; - A copy of the truck routes to be used for material delivery; and - Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed projects."	site-specific biological or cultural resource protective measures and project mitigation measures, all construction personnel would also receive the following: - A list of phone numbers of the applicant's personnel (i.e., archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator); - Instruction on the South Coast Air Quality Management District Rule 403 for control of dust; - Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator; - Instruction on washing the wheels, tracks, and underbodies of construction vehicles to minimize the spread of invasive species; - Instruction on individual responsibilities under the CWA, the Storm Water Pollution Prevention Plan (SWPPP) for the proposed projects, site-specific Best Management Practices (BMPs), and the location of Material Safety Data Sheets for the proposed projects; - Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination; - <u>Instructions to follow worker safety guidelines and policies in the event of an earthquake;</u> - A copy of the truck routes to be used for material delivery; and - Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed projects."
Valley-Ivyglen	4.9.4.2	4.9-14	Line 36 under the heading Construction states: "Valley–Ivyglen project components would cross several drainages as well as some rivers, as shown in Figure 4.9-2."	SCE suggests the following edits: "Valley–Ivyglen project components would cross several drainages as well as <u>the San Jacinto River</u> ~~some rivers~~, as shown in Figure 4.9-2."

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.9.4.2	4.9-15	Line 8 under the Construction header in the Impact WQ-1 (VIG) section states: "These activities have the potential to adversely affect water quality because they would use equipment that could release hazardous substances and that would also require ground disturbance that can mobilize sediment. Acreages of soil disturbance are provided in Table 2-5. Temporary impacts would occur on up to 633.7 acres. Though these areas would be spread across the entire project alignment, this amount of ground disturbance would in the aggregate result in substantial soil erosion and could increase sedimentation. Precipitation or water flow during or soon after ground disturbing activities would exacerbate soil erosion and sedimentation impacts. The resulting sedimentation could adversely affect water quality and violate water quality standards. In addition to sedimentation, ground-disturbing activities could initiate the release of existing contaminants into waters or drainage systems. Spills of hazardous materials used during construction could also result in a discharge that could adversely impact water quality. This would be a significant impact."	SCE suggests the following edits: "These activities have the potential to adversely affect water quality because they would use equipment that could release hazardous substances and that would also require ground disturbance that can mobilize sediment. Acreages of soil disturbance are provided in Table 2-5. Temporary impacts would occur on up to 633.7 acres. Though these areas would be spread across the entire project alignment, this amount of ground disturbance ~~would~~ could in the aggregate result in substantial soil erosion and could increase sedimentation. Precipitation or water flow during or soon after ground disturbing activities ~~would~~ could exacerbate soil erosion and sedimentation impacts. The resulting sedimentation could adversely affect water quality and violate water quality standards. In addition to sedimentation, ground-disturbing activities could initiate the release of existing contaminants into waters or drainage systems. Spills of hazardous materials used during construction could also result in a discharge that could adversely impact water quality. This would be a significant impact."
Valley-Ivyglen	4.9.4.2	4.9-15	Line 16 under heading Construction states: "Spills of hazardous materials used during construction could also result in a discharge that could adversely impact water quality. This would be a significant impact."	To be consistent with the Hazards sections, SCE suggests the following edits: "Spills of hazardous materials used during construction could also result in a discharge that could adversely impact water quality. Appropriate BMPs would be developed to minimize impacts associated with hazardous material spills that could adversely impact water quality. This would be a less than significant impact."
Valley-Ivyglen	4.9.4.2	4.9-15	Line 30 under the Construction header in the Impact WQ-1 (VIG) section states: "SCE has proposed several Project Commitments that would reduce water quality impacts. Project Commitment B would	SCE suggests the following edits: "SCE has proposed several Project Commitments that would reduce water quality impacts. Project Commitment B would require that workers be trained in hazardous materials spill

Project	Section	Page	DEIR Language	SCE Recommended Language
			require that workers be trained in hazardous materials spill notification procedures. Project Commitment D requires restoration of temporarily disturbed areas to pre-construction conditions, which would reduce the long-term sedimentation impacts of grading and ground disturbance. Permanent impacts would occur on up to 141.5 acres after implementation of Project Commitment D. Project Commitment E would require preparation of a grading plan with measures to reduce erosion and siltation. Impacts would still be significant, however, because there is no measure to reduce the potential for hazardous materials spills, no measure to clean up spills, no specific measures related to avoiding situations that would result in sedimentation and erosion, no specific measures related to water quality effects of blasting, and no specific measures that reduce sedimentation and erosion caused by ground disturbance. Mitigation Measure (MM) HZ-1 would be implemented and would require preparation of a hazardous materials management, handling, transport, disposal, and emergency response plan, which would reduce the likelihood of spills and would outline cleanup procedures. MM BR-15 outlines BMPs to be included in the SWPPP to minimize erosion and sedimentation. MM WQ-1 would require preparation of a Blasting Plan that contains measures to prevent adverse impacts on water quality from blasting that may be required at certain locations in the project area. MM WQ-2 outlines procedures that would be implemented for drainage crossings. MM WQ-3 requires implementation of methods for access road construction that reduce erosion. MM BR-7 requires attainment of success criteria when implementing the restoration plan required under Project Commitment D. With implementation of these mitigation measures, water quality impacts during construction would be less than significant.”	notification procedures. Project Commitment D requires restoration of temporarily disturbed areas to pre-construction conditions, which would reduce the long-term sedimentation impacts of grading and ground disturbance. Permanent impacts would occur on up to 141.5 acres after implementation of Project Commitment D. Project Commitment E would require preparation of a grading plan with measures to reduce erosion and siltation. Impacts would still be significant, however, because there is no measure to reduce the potential for hazardous materials spills, no measure to clean up spills, no specific measures related to avoiding situations that would result in sedimentation and erosion, no specific measures related to water quality effects of blasting, and no specific measures that reduce sedimentation and erosion caused by ground disturbance. Implementation of Project-specific BMPs provided in the SWPPP would provide cleanup requirements for any incidental spills or other potential releases of hazardous materials and ~~Mitigation Measure (MM) HZ-1 would be implemented and would require preparation of a hazardous materials management, handling, transport, disposal, and emergency response plan, which would reduce the likelihood of spills and would outline cleanup procedures.MM BR-15 outlines BMPs to be included in the SWPPP to~~ minimize erosion and sedimentation. MM WQ-1 would require preparation of a Blasting Plan that contains measures to prevent adverse impacts on water quality from blasting that may be required at certain locations in the project area. MM WQ-2 outlines procedures that would be implemented for drainage crossings. MM WQ-3 requires implementation of methods for access road construction that reduce erosion. MM BR-7 requires attainment of success criteria when implementing the restoration plan required under Project Commitment D. With implementation of the BMPs described in the SWPPP, with adherence to the Construction General Permit, and these mitigation measures, water quality impacts during construction would be less than significant.”

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.9.4.2	4.9-16	Line 4 under the heading Construction states: "The proposed project would require construction near potentially jurisdictional waters, and about 0.44 acres of waters the United States and waters of the state would be permanently impacted (Appendix G)."	Per Appendix G, please make corrections to the following: "The proposed project would require construction near potentially jurisdictional waters, and about~~0.44~~1.41acres of waters the United States and waters of the state would be permanently impacted (Appendix G)."
Valley-Ivyglen	4.9.4.2	4.9-16	Line 31 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Valley-Ivyglen	4.9.4.2	4.9-16	Line 33 under heading Mitigation Measures states: "MM WQ-1: Blasting Plan and Best Management Practices. The applicant or its contractors shall prepare and implement a detailed Blasting Plan for the Valley–Ivyglen Project. This plan shall identify the scope of blasting, all blasting locations, the proximity of facilities to each blasting location, and the types and estimated amounts of blasting agent required for each blasting location. The plan shall be submitted to and approved by the CPUC prior to start of construction and the plan shall be resubmitted for approval if changes are required. The intent of the plan is to: • Reduce the potential for increased turbidity in groundwater and surface water; • Prevent debris from entering drainages, waters of the state, and waters of the United States; and • Avoid mishandling of hazardous materials associated with blasting. BMPs shall include, but are not limited to: • Monitor the entire blasting process by licensed blasting personnel and the use of licensed blasters with qualifications that meet all federal, state, and local requirements; • Conduct pre-blast surveys and inspections and conduct post-blast surveys and inspections for blast performance	Since licensed blasting personnel is required by State Law 5328 and to allow flexibility, SCE suggests the following edits: "MM WQ-1: Blasting Plan and Best Management Practices. The applicant or its contractors shall prepare and implement a detailed Blasting Plan for the Valley–Ivyglen Project. This plan shall identify the scope of blasting, all blasting locations, the proximity of facilities to each blasting location, and the types and estimated amounts of blasting agent required for each blasting location. The plan shall be submitted to and approved by the CPUC prior to start of ~~construction~~ blasting and the plan shall be resubmitted for approval if changes are required. The intent of the plan is to: • Reduce the potential for increased turbidity in groundwater and surface water; • Prevent debris from entering drainages, waters of the state, and waters of the United States; and • Avoid mishandling of hazardous materials associated with blasting. BMPs shall include, but are not limited to: • ~~Monitor the entire blasting process by licensed blasting personnel and the use of licensed blasters with qualifications that meet all federal, state, and local requirements;~~ • Conduct pre-blast surveys and inspections and conduct post-blast surveys and inspections for blast performance

Project	Section	Page	DEIR Language	SCE Recommended Language
			and fire hazards (e.g., undetonated explosive agent or smoldering materials); • Remove and manage muck piles (blast debris) to prevent water contamination; • Place matting or padding to contain flyrock and add an appropriate blasting agent to reduce flyrock; • Select an explosive with appropriate water resistance for the blast site to reduce impacts on groundwater; • Clean loading equipment in an area where waste can be contained and kept away from drainages and other surface water; • Manage muck piles to avoid contact with stormwater and remove them from the project area as soon as reasonably feasible; and • Handle hazardous materials located during blasting in accordance with MM HZ-2."	and fire hazards (e.g., undetonated explosive agent or smoldering materials); • Remove and manage muck piles (blast debris) to prevent water contamination; • Place matting or padding to contain flyrock and add an appropriate blasting agent to reduce flyrock <u>near sensitive biological and cultural resources</u>; • Select an explosive with appropriate water resistance for the blast site to reduce impacts on groundwater; • Clean loading equipment in an area where waste can be contained and kept away from drainages and other surface water; • Manage muck piles to avoid contact with stormwater and remove them from the project area as soon as reasonably feasible; and • Handle hazardous materials located during blasting in accordance with MM HZ-2."
Valley-Ivyglen	4.9.4.2	4.9-17	Line 14 under heading Mitigation Measures states: "MM WQ-2: Drainage crossing procedures and practices. Crossing of drainages shall be conducted when the drainage is dry. A qualified aquatic monitor shall inspect the drainage crossing after precipitation and before use to determine whether the drainage is dry or needs to be avoided (e.g., through placement of a temporary bridge) to allow it to dry out and avoid impacts. If a temporary or permanent bridge is required in order to avoid impacts, the following measures shall be implemented: • Any temporary or permanent bridges shall be installed to avoid placement below the Ordinary High Water Mark of the drainage as feasible."	The requirements or limitations would be set forth in 401 permit, therefore SCE recommends removing this mitigation measure. "~~MM WQ-2: Drainage crossing procedures and practices. Crossing of drainages shall be conducted when the drainage is dry. A qualified aquatic monitor shall inspect the drainage crossing after precipitation and before use to determine whether the drainage is dry or needs to be avoided (e.g., through placement of a temporary bridge) to allow it to dry out and avoid impacts. If a temporary or permanent bridge is required in order to avoid impacts, the following measures shall be implemented:~~ • ~~Any temporary or permanent bridges shall be installed to avoid placement below the Ordinary High Water Mark of the drainage as feasible.~~" •

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.9.4.2	4.9-17	Line 25 under heading Mitigation Measures states: "MM WQ-3: Design of access roads with erosion control measures. Access roads shall be designed and built to avoid adverse erosion and siltation impacts."	SCE suggests the following edits: "MM WQ-3: Design of access roads with erosion control measures. Access roads shall be designed and built to minimize ~~avoid~~ adverse erosion and siltation impacts, where required by local jurisdictions."
Valley-Ivyglen	4.9.4.2	4.9-18	Line12 under heading Construction states: "Construction of the proposed Valley–Ivyglen Project would require approximately 36 million gallons (110 acre-feet) of water over a period of 28 months, which is equivalent to water use at an average of 47.2 acre-feet per year. All of the water required for construction and operation of the proposed Valley–Ivyglen Project would be provided by EVMWD and/or EMWD. EVMWD obtains 20 percent of its water from the Elsinore Groundwater Basin. If all of the water for the proposed project came from the EVMWD, 47.2 acre-feet per year would represent about 0.18 percent of the total water produced by EVMWD during the 2013/14 fiscal year (EVMWD 2015)."	For consistency with the project description, SCE suggests the following edits: "Construction of the proposed Valley–Ivyglen Project would require approximately56~~36~~million gallons (~~110~~172acre-feet) of water over a period of 28 months, which is equivalent to water use at an average of73.7~~47.2~~acre-feet per year. All of the water required for construction and operation of the proposed Valley–Ivyglen Project would be provided by EVMWD and/or EMWD. EVMWD obtains 20 percent of its water from the Elsinore Groundwater Basin. If all of the water for the proposed project came from the EVMWD, 73.7~~47.2~~acre-feet per year would represent about 0.18 percent of the total water produced by EVMWD during the 2013/14 fiscal year (EVMWD 2015)."
Valley-Ivyglen	4.9.4.2	4.9-18	Line 33 under heading Construction states: "The dewatering would not affect groundwater levels in the aquifers used for groundwater supply because the groundwater basin is a minimum of 250 bgs. Impacts from perched groundwater extraction would be less than significant."	SCE suggests the following addition for clarification: "The dewatering would not affect groundwater levels in the aquifers used for groundwater supply because the groundwater basin is a minimum of 250 feet bgs. Impacts from perched groundwater extraction would be less than significant."
Valley-Ivyglen	4.9.4.2	4.9-19	Line 15 under the Construction header in the Impact WQ-3 (VIG) section states: "SCE has proposed several Project Commitments that would reduce erosion and siltation impacts from drainage alteration. Project Commitment D requires restoration of temporarily disturbed areas to pre-construction conditions, which would reduce the long-term sedimentation impacts of grading and	Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is a regulatory requirement, not a mitigation measure. Please modify as follows: "SCE has proposed several Project Commitments that would reduce erosion and siltation impacts from drainage alteration. Project Commitment D requires restoration of temporarily disturbed areas to pre-construction conditions, which would

Project	Section	Page	DEIR Language	SCE Recommended Language
			ground disturbance. Project Commitment E requires that grading incorporate measures to minimize erosion and siltation. Impacts would still be significant, however, because there are no specific measures related to avoiding situations that would result in sedimentation and erosion, and no specific measures that reduce sedimentation and erosion caused by ground disturbance. MM BR-15 outlines BMPs to be included in the SWPPP to minimize erosion and sedimentation. MM WQ-2 outlines procedures implemented for drainage crossings. MM WQ-3 requires implementation of methods for access road construction that reduce erosion. MM BR-7 requires attainment of success criteria when implementing the restoration plan required under Project Commitment D. With implementation of these mitigation measures, erosion and sedimentation impacts during construction would be less than significant."	reduce the long-term sedimentation impacts of grading and ground disturbance. Project Commitment E requires that grading incorporate measures to minimize erosion and siltation. Impacts would still be significant, however, because there are no specific measures related to avoiding situations that would result in sedimentation and erosion, and no specific measures that reduce sedimentation and erosion caused by ground disturbance. Implementation of Project-specific BMPs provided in the SWPPP would ~~MM BR-15 outlines BMPs to be included in the SWPPP to~~ minimize erosion and sedimentation. MM WQ-2 outlines procedures implemented for drainage crossings. MM WQ-3 requires implementation of methods for access road construction that reduce erosion. MM BR-7 requires attainment of success criteria when implementing the restoration plan required under Project Commitment D. With implementation of the SWPPP and these mitigation measures, erosion and sedimentation impacts during construction would be less than significant."
Valley-Ivyglen	4.9.4.2	4.9-19	Line 35 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Valley-Ivyglen	4.9.4.2	4.9-20	Line 15 under heading Construction states: "Several TSPs would be placed along the San Jacinto River. TSPs and lattice steel towers would be placed adjacent to proposed open channels in the Romoland MDP area."	SCE suggests the following edits: "Several TSPs would be placed along the San Jacinto River. TSPs and ~~lattice steel towers~~ lightweight steel poles would be placed adjacent to proposed open channels in the Romoland MDP area."
Valley-Ivyglen	4.9.4.2	4.9-20	Line 38 under heading Mitigation Measures states: "MM WQ-6: Avoid impeding MDP implementation and function. Prior to construction, SCE shall provide final engineering designs to the RCFCWCD for project elements located within MDP areas. Construction within MPD areas shall	SCE suggests the following edits: "MM WQ-6: Avoid impeding MDP implementation and function. Prior to construction, SCE shall consult with ~~provide final engineering designs to~~ the RCFCWCD for project elements located within MDP areas. Construction within ~~MPD~~ MDP areas

Project	Section	Page	DEIR Language	SCE Recommended Language
			not be allowed to proceed until SCE obtains written confirmation from the RCFCWCD that project elements located in these areas would not impede the function of flood control facilities and would not prevent implementation of the MDP."	shall not be allowed to proceed until SCE consults with ~~obtains written confirmation from~~ the RCFCWCD about whether ~~that~~ project elements located in these areas would not impede the function of flood control facilities and would not prevent implementation of the MDP."
Valley-Ivyglen	4.9.4.2	4.9-21	Line 12, Under the Construction header in the Impact WQ-5 (VIG) section states: "Temporary impacts during construction would occur on up to 625.8 acres. Most of these impacts would be associated with of pole work areas, staging areas, and access roads. Pole work areas and access roads would be spread throughout the entire alignment such that the amount of runoff created in any particular area would not be substantial. Further, the majority of the ground disturbance would be temporary; final disturbance would total about 141.5 acres and be distributed throughout the entire project area. Staging areas would be covered with gravel or crushed rock, which would reduce the amount of runoff generated. Impacts would be less than significant, and no mitigation would be required."	SCE suggests the following edits: "Temporary impacts during construction would occur on up to~~625.8~~633.7acres. Most of these impacts would be associated with of pole work areas, staging areas, and access roads. Pole work areas and access roads would be spread throughout the entire alignment such that the amount of runoff created in any particular area would not be substantial. Further, the majority of the ground disturbance would be temporary; ~~final~~ permanent disturbance would total about 141.5 acres and be distributed throughout the entire project area. Staging areas would be covered with gravel or crushed rock, which would reduce the amount of runoff generated. Impacts would be less than significant, and no mitigation would be required."
Valley-Ivyglen	4.9.4.2	4.9-22	Line 35 under heading Operation and Maintenance states: "Operation and maintenance would require occasional inspections of the 115-kvsubtransmissionline and associated structures. This would place a minimal amount of workers in flood zones and dam failure inundation areas during inspection. It is unlikely that a flood would occur during inspections since they would generally not take place in inclement wet weather. Although dam failure is unlikely to occur, dam failure would be a significant impact. MM HZ-4 would require development of a Fire Control and Emergency Response Plan, which would outline evacuation procedures and require training on those procedures. Impacts would be less than significant with mitigation."	Because dam failure is unlikely, and because the effects to the Project under a worst-case scenario would be minor SCE suggests the following edits: "Operation and maintenance would require occasional inspections of the 115-kv subtransmission line and associated structures. This would place a minimal amount of workers in flood zones and dam failure inundation areas during inspection. It is unlikely that a flood would occur during inspections since they would generally not take place in inclement wet weather. In addition, the California Division of Safety of Dams (DSOD) requires all dam operators to comply with annual inspections and seismic standards that minimize the potential for a catastrophic failure of the dam. Dam inundation mapping is done under the assumption of a total catastrophic collapse in a matter of minutes, which is not how dams typically fail, but is mapped in this way to

Project	Section	Page	DEIR Language	SCE Recommended Language
				simulate a worst-case scenario. ~~Although dam failure is unlikely to occur, dam failure would be a significant impact. MM HZ-4 would require development of a Fire Control and Emergency Response Plan, which would outline evacuation procedures and require training on those procedures.~~ Impacts would be less than significant ~~with mitigation~~."
Alberhill	4.9.5.1	4.9-23	Line 47 under heading Project Commitments (Alberhill Project) states: "Project Commitment B: Worker Environmental Awareness Plan. Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission (CPUC). A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any site-specific biological or cultural resource protective measures and project mitigation measures, all construction personnel would also receive the following: - A list of phone numbers of the applicant's personnel (i.e., archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator); - Instruction on the South Coast Air Quality Management District Rule 403 for control of dust; - Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator; - Instruction on washing the wheels, tracks, and underbodies of construction vehicles to minimize the spread of invasive species; - Instruction on individual responsibilities under the CWA, the Storm Water Pollution Prevention Plan (SWPPP) for the proposed projects, site-specific Best Management	Per SCE's suggested edits to Project Commitment B, SCE suggests the following edits: "Project Commitment B: Worker Environmental Awareness Plan. Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission (CPUC). A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any site-specific biological or cultural resource protective measures and project mitigation measures, all construction personnel would also receive the following: - A list of phone numbers of the applicant's personnel (i.e., archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator); - Instruction on the South Coast Air Quality Management District Rule 403 for control of dust; - Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator; - Instruction on washing the wheels, tracks, and underbodies of construction vehicles to minimize the spread of invasive species; - Instruction on individual responsibilities under the CWA, the Storm Water Pollution Prevention Plan (SWPPP) for

Project	Section	Page	DEIR Language	SCE Recommended Language
			Practices (BMPs), and the location of Material Safety Data Sheets for the proposed projects; - Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination; - A copy of the truck routes to be used for material delivery; and - Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed projects."	the proposed projects, site-specific Best Management Practices (BMPs), and the location of Material Safety Data Sheets for the proposed projects; - Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination; - Instructions to follow worker safety guidelines and policies in the event of an earthquake; - A copy of the truck routes to be used for material delivery; and - Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed projects."
Alberhill	4.9.5.2	4.9-25	Line2 under the heading Construction states: "Alberhill System Project components would cross several drainages as well as some rivers, as shown in Figure 4.9-2."	SCE suggests the following edits: "Alberhill System Project components would cross several drainages as well as the San Jacinto River ~~some rivers~~, as shown in Figure 4.9-2."
Alberhill	4.9.5.2	4.9-26	Line 1 under heading Construction states: "Impacts would still be significant, however, because there is no measure to reduce the 1 potential for hazardous materials spills, no measure to clean up spills, no specific measures related to avoiding situations that would result in sedimentation and erosion, no specific measures related to water quality effects of blasting, and no specific measures that reduce sedimentation and erosion caused by ground disturbance. MM HZ-1 would be implemented and would require preparation of a hazardous materials management, handling, transport, disposal, and emergency response plan, which would reduce the likelihood of spills and would outline cleanup procedures. MM BR-15 outlines BMPs to be included in the SWPPP to minimize erosion and sedimentation. MM WQ-2 outlines procedures that shall be implemented for drainage crossings. MM WQ-3 requires	Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is a regulatory requirement, not a mitigation measure. SCE suggests the following modifications: "Impacts would still be significant, however, because there is no measure to reduce the 1 potential for hazardous materials spills, no measure to clean up spills, no specific measures related to avoiding situations that would result in sedimentation and erosion, no specific measures related to water quality effects of blasting, and no specific measures that reduce sedimentation and erosion caused by ground disturbance. Implementation of Project-specific BMPs provided in the SWPPP would provide cleanup requirements for any incidental spills or other potential releases of hazardous materials and ~~MM HZ-1 would be implemented and would require preparation of a hazardous materials management, handling, transport, disposal, and~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			implementation of methods for access road construction, if the conventional method of construction is used for the 500-kV transmission line, that reduce erosion. MM BR-10 requires attainment of success criteria when implementing the restoration plan required under Project Commitment D. With implementation of these Project Commitments and mitigation measures, water quality impacts during construction would be less than significant."	~~emergency response plan, which would reduce the likelihood of spills and would outline cleanup procedures. MM BR-15 outlines BMPs to be included in the SWPPP to~~ minimize erosion and sedimentation. MM WQ-2 outlines procedures that shall be implemented for drainage crossings. MM WQ-3 requires implementation of methods for access road construction, if the conventional method of construction is used for the 500-kV transmission line, that reduce erosion. MM BR-10 requires attainment of success criteria when implementing the restoration plan required under Project Commitment D. With implementation of these Project Commitments, the SWPPP and mitigation measures, water quality impacts during construction would be less than significant."
Alberhill	4.9.5.1	4.9-26	Line 40 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill	4.9.5.2	4.9-26	Line 15 under heading Construction states: "The proposed project would require construction near potentially jurisdictional waters, and about 1.71 acres of waters of the United States and waters of the state would be permanently impacted (Appendix G)."	Per Appendix G, SCE recommends the following edits: "The proposed project would require construction near potentially jurisdictional waters, and about 0.80~~1.71~~acreof waters of the United States and waters of the state would be permanently impacted (Appendix G)."
Alberhill	4.9.5.2	4.9-27	Line 10 under heading Construction states: "Construction of the proposed Alberhill Project would require approximately 120 acre-feet of water over a period of 28 months, which is equivalent to water use at 51.4 acre-feet per year. The water requirement for construction of towers along the 500-kV transmission line would be greater under the Conventional Method than under the Helicopter Construction option, as the latter would involve less ground disturbance and require less water for dust suppression. All of the water required for construction and operation of the proposed Valley–Ivyglen Project would be provided by EVMWD or EMWD.	For consistency with the project description, SCE suggests the following edits: "Construction of the proposed Alberhill Project would require approximately ~~120~~169acre-feet of water over a period of 28 months, which is equivalent to water use at ~~51.4~~72.4acre-feet per year. The water requirement for construction of towers along the 500-kV transmission line would be greater under the Conventional Method than under the Helicopter Construction option, as the latter would involve less ground disturbance and require less water for dust suppression. All of the water required

Project	Section	Page	DEIR Language	SCE Recommended Language
			EVMWD obtains 20 percent of its water from the Elsinore Groundwater Basin. If all of the water for the proposed project came from the EVMWD, 51.4 acre-feet per year would represent about 0.21 percent of the total water produced by EVMWD during the 2013/14 fiscal year (EVMWD 2015)."	for construction and operation of the proposed Valley–Ivyglen Project would be provided by EVMWD or EMWD. EVMWD obtains 20 percent of its water from the Elsinore Groundwater Basin. If all of the water for the proposed project came from the EVMWD,~~51.4~~72.4acre-feet per year would represent about 0.21 percent of the total water produced by EVMWD during the 2013/14 fiscal year (EVMWD 2015)."
Alberhill	4.9.5.2	4.9-27	Line 34 under heading Construction states: "The dewatering would not affect groundwater levels in the aquifers used for groundwater 34 supply because the groundwater basin is a minimum of 250 bgs."	SCE suggests the following revision: "The dewatering would not affect groundwater levels in the aquifers used for groundwater supply because the groundwater basin is a minimum of 250 feet bgs."
Alberhill	4.9.5.2	4.9-28	Line 26 under heading Construction states: "…success criteria when implementing the restoration plan required under Project Commitment D. MM BR-15 contains BMPs that would be included in the SWPPP to reduce temporary erosion and sedimentation impacts."	SCE suggests the following revision: "…success criteria when implementing the restoration plan required under Project Commitment D. ~~MM BR-15 contains BMPs that would be included in the SWPPP to reduce temporary erosion and sedimentation impacts.~~"
Alberhill	4.9.5.2	4.9-28	Line 44 under heading Construction states: "Impacts would still be significant, however, because there are no specific measures related to avoiding situations that would result in sedimentation and erosion, and no specific measures that reduce sedimentation and erosion caused by ground disturbance. MM BR-15 outlines BMPs to be included in the SWPPP to minimize erosion and sedimentation. MM WQ-2 outlines procedures that shall be implemented for drainage crossings. MM WQ-3 requires implementation of methods for access road construction that reduce erosion. MM BR-7 requires attainment of success criteria when implementing the restoration plan required under Project Commitment D. With implementation of these mitigation measures, erosion and sedimentation impacts during construction would be less than significant."	Compliance with the Clean Water Act including SWRCB-issued Construction General Permits is a regulatory requirement, not a mitigation measure. SCE suggests the following modifications: "Impacts would still be significant, however, because there are no specific measures related to avoiding situations that would result in sedimentation and erosion, and no specific measures that reduce sedimentation and erosion caused by ground disturbance. Implementation of Project-specific BMPs provided in the SWPPP would ~~MM BR-15 outlines BMPs to be included in the SWPPP to~~ minimize erosion and sedimentation. MM WQ-2 outlines procedures that shall be implemented for drainage crossings. MM WQ-3 requires implementation of methods for access road construction that reduce erosion. MM BR-7 requires attainment of success criteria when implementing the restoration plan required under Project Commitment D. With

Project	Section	Page	DEIR Language	SCE Recommended Language
				implementation of the SWPPP and these mitigation measures, erosion and sedimentation impacts during construction would be less than significant."
Alberhill	4.9.5.1	4.9-29	Line 9 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill	4.9.5.2	4.9-32	Line 10 under heading Operation and Maintenance states: "Operation and maintenance would require occasional inspections of the substation, 115-kvsubtransmissionline, 500-kV transmission line, the Alberhill Substation, and associated structures. This would place a minimal amount of workers in flood zones and dam failure inundation areas during inspection. It is unlikely a flood would occur during inspections since they would generally not take place in inclement wet weather. Although dam failure is unlikely to occur, dam failure would be a significant impact. MM HZ-4 would require development of an Emergency Response Plan, which would outline evacuation procedures and require training on those procedures. Impacts would be less than significant with mitigation."	Because dam failure is unlikely, and because the effects to the Project under a worst-case scenario would be minor SCE suggests the following edits: "Operation and maintenance would require occasional inspections of the substation, 115-kvsubtransmissionline, 500-kV transmission line, the Alberhill Substation, and associated structures. This would place a minimal amount of workers in flood zones and dam failure inundation areas during inspection. It is unlikely a flood would occur during inspections since they would generally not take place in inclement wet weather. In addition, the California Division of Safety of Dams (DSOD) requires all dam operators to comply with annual inspections and seismic standards that minimize the potential for a catastrophic failure of the dam. Dam inundation mapping is done under the assumption of a total catastrophic collapse in a matter of minutes, which is not how dams typically fail, but is mapped in this way to simulate a worst-case scenario. ~~Although dam failure is unlikely to occur, dam failure would be a significant impact. MM HZ-4 would require development of an Emergency Response Plan, which would outline evacuation procedures and require training on those procedures.~~ Impacts would be less than significant ~~with mitigation~~."
Alberhill/ Valley-Ivyglen	4.10.2.3	4.10-4	Line 26 under heading Regional and Local states:	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading:

Project	Section	Page	DEIR Language	SCE Recommended Language
				"The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen	4.10.4	4.10-18	Table 4.10-3 Valley-Ivyglen Land Use Plans, Policies and Regulations Consistency Analysis in the Consistency Analysis column of the Resource Protection Policy 14.1 row it states: "INCONSISTENT. This policy would be applicable to 115-kV Segments VIG2 through VIG5 and Staging Areas VIG4 through VIG6, VIG8, and VIG12 through VIG14. As described in Impact GHG-2 (VIG) in Chapter 4.7, "Greenhouse Gases," the proposed project would be consistent with AB32 and would not conflict with Resource Protection Policy 14.1."	SCE suggests the following edits: "~~IN~~CONSISTENT. This policy would be applicable to 115-kV Segments VIG2 through VIG5 and Staging Areas VIG4 through VIG6, VIG8, and VIG12 through VIG14. As described in Impact GHG-2 (VIG) in Chapter 4.7, "Greenhouse Gases," the proposed project would be consistent with AB32 and would not conflict with Resource Protection Policy 14.1."
Valley-Ivyglen/ Alberhill Substation	4.11.1.3	4.11-3	Line 25 under heading Existing Noise Level states: "The proposed projects include 115-kV subtransmission line and telecommunication segments that would for the most part be located along existing roadways."	SCE suggests the following edits: "The proposed projects include 115-kV subtransmission line ~~and~~, telecommunication, and Alberhill substation that would for the most part be located along existing roadways."
Alberhill	4.11.1.4	4.11-8	Table 4.11-5 Sensitive Receptors Located Hear the Proposed Alberhill Project Components 115-kV Subtransmission Lines	Revise subtransmission line names in table to match Table 2-2

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td></td><td></td><td></td><td></td><td>
<table>
<tr><td>Segment ASP1.5: New double-circuit 115-kV subtransmission line and removal of existing single-circuit section of Valley–Elsinore–Fogarty~~–Ivyglen~~ 115-kV line</td><td>Residence on Hostettler Road (across Corona Freeway)</td><td>278</td><td>Unincorporated Riverside County</td></tr>
<tr><td>Segment ASP3: New double-circuit 115-kV line segment and removal of existing single-circuit section of Valley–Elsinore–Fogarty~~–Ivyglen~~ 115-kV line</td><td>Residences on Collier Avenue and 2nd Street</td><td>181</td><td>City of Lake Elsinore</td></tr>
<tr><td>Segment ASP4: New double-circuit 115-kV subtransmission line and removal of existing single-circuit sections of ~~Ivyglen–Newcomb–Skylark and~~ Elsinore–Skylark 115-kV lines</td><td>Residences on E Hill Street, E Pottery Street, Casino Drive, Malaga Road, and Mission Trail</td><td>20</td><td>City of Lake Elsinore</td></tr>
</table>
</td></tr>
<tr><td>Alberhill/ Valley-Ivyglen</td><td>4.11.2.3</td><td>4.11-12</td><td>Line 1 under heading Regional and Local</td><td>Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading:</td></tr>
</table>

Project	Section	Page	DEIR Language	SCE Recommended Language
				"The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only.
Valley-Ivyglen	4.11.4.1	4.11-18	Line 17 under heading Project Commitments (Valley-Ivyglen Project) states: Project Commitment H: Noise Control • All construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and all legally proclaimed holidays. If the California Independent System Operator (CAISO) and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday, SCE would obtain variances from all applicable jurisdictions. • 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. • Construction traffic shall be routed away from residences and schools where feasible. • Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible. The ability to limit construction vehicle idling time is dependent upon	For consistency with Section 2.6, SCE suggests the following edits: Project Commitment H: Noise Control. • All construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and ~~all legally proclaimed~~ holidays recognized by the local jurisdictions. ~~If the California Independent System Operator (CAISO) and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday, SCE would obtain variances from all applicable jurisdictions.~~ In the event that construction activities are necessary on days or hours outside of what is specified by the local ordinance, SCE would provide advanced notification, including a general description of the work to be performed, location and hours of construction anticipated, to the CPUC, the local jurisdiction, and residents within 300 feet of the anticipated work. • Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less

Project	Section	Page	DEIR Language	SCE Recommended Language
			the sequence of construction activities and when and where vehicles are needed or staged. A "common sense" approach to vehicle use shall be applied; if a vehicle is not required for use immediately or continuously for construction activities, its engine should be shut off. Note: certain equipment, such as large diesel-powered vehicles require extended idling for warm-up and repetitive construction tasks. • The applicant will notify all receptors within 500 feet of construction of the potential to experience significant noise levels during construction. • During construction, the applicant will use sound walls, noise-reduction blankets, or other noise reduction measures prior to developing the project site in areas where sensitive receptors would be subjected to significant noise impacts. • The applicant would shield small stationary equipment with portable barriers within 100 feet of residences. • The applicant would minimize engine idling and turn off engines when not in use. • Where blasting is required, the applicant would conduct additional pre-blast notification and coordination with residents, utilities, and others that may be affected by blasting operations.	effective than those originally installed by the manufacturer. • Construction traffic shall be routed away from residences and schools where feasible. • Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. A "common sense" approach to vehicle use shall be applied; if a vehicle is not required for use immediately or continuously for construction activities, its engine should be shut off. Note: certain equipment, such as large diesel-powered vehicles require extended idling for warm-up and repetitive construction tasks. • The applicant will notify all receptors within 3~~5~~00 feet of construction of the potential to experience significant noise levels during construction. • During construction, the applicant will use a temporary noise barrier between the construction area and the residence ~~sound walls, noise-reduction blankets, or other noise reduction measures prior to developing the project site~~ in areas where sensitive receptors would be subjected to significant noise impacts. • The applicant would shield small stationary equipment with portable barriers within 100 feet of residences, where feasible. • The applicant would minimize engine idling and turn off engines when not in use. • Where blasting is required, the applicant would conduct additional pre-blast notification and coordination with residents, utilities, and others that may be affected by blasting operations.
Valley-Ivyglen	4.11.4.1	4.11-19	Line 25 under heading Construction states: "...occurring over a total period of 27 months."	Per SCE project description edits submitted in September 2015, SCE suggests the following edits: "...occurring over a total period of ~~27~~ 28 months."

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	4.11.4.2	4.11-19	Line 39 under heading 115-kV Segment VIG1 states: "The predicted noise level at the nearest sensitive receptor in the City of Perris (a residence on Caldera Street, 45 feet from the project area) would be 95 dBA (E & E 2015b, SCE 2014). In addition, a Hughes 500E helicopter would be used for wire stringing along segment VIG1, resulting in potential impacts during helicopter flyovers above residential areas. This type of helicopter produces a maximum sound level of 82.3 dBA, at a level fly over of 500 feet and 130 miles per hour (mph; FAA 1977). In addition, the applicant would use blasting at certain locations along segment VIG1, specifically near structure 131 and between structures 144 and 147, in the City of Perris. Blasting would result in high instantaneous noise levels of 94 dBA at 50 feet per blasting event (FHWA 2006). The nearest sensitive receptors to blasting sites are located at 47 feet from work areas, resulting in levels above the 80-dBA threshold during blasting events."	Blasting in the City of Perris would only occur at proposed Pole 131. Poles 144-147 are located within unincorporated Riverside County, which exempts construction activities from sound levels. SCE suggests the following edits: "The predicted noise level at the nearest sensitive receptor in the City of Perris (a residence on Caldera Street, 45 feet from the project area) would be 95 dBA (E & E 2015b, SCE 2014). In addition, a Hughes 500E helicopter would be used for wire stringing along segment VIG1, resulting in potential impacts during helicopter flyovers above residential areas. This type of helicopter produces a maximum sound level of 82.3 dBA, at a level fly over of 500 feet and 130 miles per hour (mph; FAA 1977). In addition, the applicant would use blasting at certain locations along segment VIG1, specifically near structure 131 ~~and between structures 144 and 147~~, in the City of Perris. Blasting would result in high instantaneous noise levels of 94 dBA at 50 feet per blasting event (FHWA 2006). The nearest sensitive receptors to blasting sites are located over 1,500 ~~at 47~~ feet from work areas, and therefore not expected to exceed ~~resulting in~~ levels above the 80-dBA threshold during blasting events."
Valley-Ivyglen	4.11.4.1	4.11-20	Line 17 under heading 115-kV Segment VIG1 states: "The applicant will implement Project Commitment H, which limits all construction and general maintenance activities, except in an emergency, between 7:00 a.m. and 7:00 p.m., and prohibited on Sundays and all legally proclaimed holidays. The applicant would also obtain variances from local jurisdictions, if CAISO and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday."	SCE suggests the following edits "The applicant will implement Project Commitment H.~~, which limits all construction and general maintenance activities, except in an emergency, between 7:00 a.m. and 7:00 p.m., and prohibited on Sundays and all legally proclaimed holidays. The applicant would also obtain variances from local jurisdictions, if CAISO and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday.~~"
Valley-Ivyglen	4.11.4.2	4.11-23	Line 6 under heading Operation and Maintenance states: "Maintenance activities on the 115-kV subtransmission lines would be primarily for inspection and would occur at least once	Noise from vehicle use would not be perceptible. Helicopter use during maintenance would be minimal, occurring once a year, and would not require hovering for long periods of time. SCE suggests the following edits:

Project	Section	Page	DEIR Language	SCE Recommended Language
			per year by driving and/or flying the line routes, resulting in a temporary increase of noise levels due to vehicle and helicopter use. Noise from these sources would be limited and short-term, but have the potential to exceed noise standards in the City of Perris and City of Lake Elsinore, for those activities occurring within 50 feet from sensitive receptors. Implementation of MM NV-1 would reduce noise from maintenance activities to levels that are in compliance with the applicable noise ordinances. Therefore, operation and maintenance noise impacts would be less than significant after mitigation. Other maintenance activities include the inspection and repair of telecommunication components, which would occur once per year at each substation. Impacts associated to inspection and repair of telecommunication components would not exceed applicable noise standards."	"Maintenance activities on the 115-kV subtransmission lines would be primarily for inspection and would occur at least once per year by driving and/or flying the line routes, resulting in a temporary increase of noise levels due to vehicle and/or helicopter use. Although helicopter use would have the potential to exceed noise standards in the City of Perris and City of Lake Elsinore, for those activities occurring within 50 feet from sensitive receptors, noise from these sources would be limited and short-term~~, but have the potential to exceed noise standards in the City of Perris and City of Lake Elsinore, for those activities occurring within 50 feet from sensitive receptors~~. ~~Implementation of MM NV-1 would reduce noise from maintenance activities to levels that are in compliance with the applicable noise ordinances.~~ Therefore, operation and maintenance noise impacts would be less than significant ~~after mitigation~~. Other maintenance activities include the inspection and repair of telecommunication components, which would occur once per year at each substation. Impacts associated to inspection and repair of telecommunication components would not exceed applicable noise standards."
Alberhill/ Valley-Ivyglen	4.11.4.2	4.11-23	Line 18 under heading Mitigation Measures states: "MM NV-1 Construction and Maintenance Noise Reduction Measures. Prior the start of construction, the applicant shall prepare and submit to the CPUC a Noise Control Plan, which shall detail the frequency, location, and methodology for noise monitoring prior to and during the proposed construction activities. The Noise Control Plan will shall also detail the actions and procedures that the applicant will implement to avoid significant impacts from temporary ambient noise increases. Measures in the Noise Control Plan shall include, but not be limited to the following: • Limiting the timeframes for heavy-duty equipment usage to less than 4 hours per day, • Reducing the number of pieces of equipment concurrently operating, as feasible.	SCE suggests the following edits per reasons provided in italics below : Construction noise is exempt in all jurisdictions except for the Cities of Lake Elsinore and Perris. MM NV-1 Construction ~~and Maintenance~~ Noise Reduction Measures. Prior the start of construction, the applicant shall prepare and submit to the CPUC a Noise Control Plan, which shall detail the frequency, location, and methodology for noise monitoring prior to and during the proposed construction activities within the Cities of Lake Elsinore and Perris. The Noise Control Plan will shall also detail the actions and procedures that the applicant will implement to avoid significant impacts from temporary ambient noise increases. Measures in the Noise Control Plan shall include, but not be limited to the following:

Project	Section	Page	DEIR Language	SCE Recommended Language
			• Using construction equipment specifically designed for low noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines). Electric engines have been reported to have lower noise levels than internal combustion engines. • Compensating residents for temporary relocation during high-noise activities that cannot be reduced to less than 75 dBA • If noise from construction and maintenance equipment will result in noise levels in excess of 75 dBA at the closest residential receptor's property line, the applicant shall implement additional noise reduction measures, including the use of portable noise absorption screens surrounding the specific work area and a staggered construction work practice as needed, to ensure that noise levels in areas close to sensitive receptors are within an acceptable range (i.e., 65 to 75 dBA, to the extent technically and economically feasible). • The applicant shall provide a written request to the CPUC regarding any construction that will occur during the hours of 7:00 p.m. to 7:00 a.m. or on Sundays any legally proclaimed holidays. The written request shall include justification of why work must occur during these hours/days, and a detailed description of work activities and location to be performed. The applicant must receive approval from the CPUC prior to any construction work occurring during these times. • The applicant shall monitor construction and maintenance noise levels in hourly equivalent averages Leq(h) before and during construction activities planned within feet of noise sensitive receptors. During the project construction period, noise measurements shall be taken on a daily basis and reported to the CPUC on a monthly basis, within 15 days of the end of the monitoring period.	*Bullet 1 – Limiting the equipment usage to 4 hours per day would extend construction to approximately 5 years. This delay would result in an interruption of service thus not meeting the project objectives, for example "operational and maintenance flexibility on subtransmission lines without interruption of service.* • ~~Limiting the timeframes for heavy-duty equipment usage to less than 4 hours per day.~~ • Reducing the number of pieces of equipment concurrently operating near sensitive receptors, as feasible. *Bullet 3 - Obtaining enough electric or natural gas equipment for construction is not economically feasible* • ~~Using construction equipment specifically designed for low noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines). Electric engines have been reported to have lower noise levels than internal combustion engines.~~ *Bullet 4 – The FTA has identified a day time hourly Leq level of 90 dBA as a noise level where adverse community reaction could occur.* • ~~Compensating residents for temporary relocation during high-noise activities that cannot be reduced to less than 75 dBA~~ *Bullet 5 - SCE has proposed to construct the projects between 7am and 7pm, which is consistent with the noise ordinances for Perris and Lake Elsinore. Construction activities would generally be conducted in a linear fashion, which would limit noise exposure at any one location to not more than a few hours (Lakeview FEIR). Therefore, the mitigation measure would be*

Project	Section	Page	DEIR Language	SCE Recommended Language
			The applicant shall submit the Noise Control Plan to the CPUC for review and approval at least 30 days prior to the start of project construction. The applicant shall comply with all requirements of the approved Noise Control Plan whenever it applies during construction and maintenance activities for the projects."	*overly burdensome and unnecessary. If night work is necessary, SCE will implement Project Commitment H. Therefore, SCE suggests the following edits:* • ~~If noise from construction and maintenance equipment will result in noise levels in excess of 75 dBA at the closest residential receptor's property line, the applicant shall implement additional noise reduction measures, including the use of portable noise absorption screens surrounding the specific work area and a staggered construction work practice as needed, to ensure that noise levels in areas close to sensitive receptors are within an acceptable range (i.e., 65 to 75 dBA, to the extent technically and economically feasible).~~ *Bullet 6 - "Noise reduction measures" - duplicative with Commitment H* • ~~"The applicant shall provide a written request to the CPUC regarding any construction that will occur during the hours of 7:00 p.m. to 7:00 a.m. or on Sundays any legally proclaimed holidays. The written request shall include justification of why work must occur during these hours/days, and a detailed description of work activities and location to be performed. The applicant must receive approval from the CPUC prior to any construction work occurring during these times.~~ • The applicant shall monitor construction and maintenance noise levels in hourly equivalent averages Leq(h) before and during construction activities planned within <u>20</u> feet of noise sensitive receptors. During the project construction period, noise measurements shall be taken on a daily basis and reported to the CPUC on a monthly basis, within 15 days of the end of the monitoring period.

Project	Section	Page	DEIR Language	SCE Recommended Language
				The applicant shall submit the Noise Control Plan to the CPUC for review and approval at least 30 days prior to the start of project construction. The applicant shall comply with all requirements of the approved Noise Control Plan whenever it applies during construction ~~and maintenance~~ activities for the projects."
Valley-Ivyglen	4.11.4.2	4.11-25	Line 3 under heading Construction states: "Blasting locations for 115-kV Segments VIG1, 3 VIG2, and VIG5 would be located between 65 to 90 feet from sensitive receptors (see Table 2-10)."	SCE suggests the following edits: Blasting locations for 115-kV Segments VIG1, 3 VIG2, and VIG5 would be located between 65 to 90 feet from sensitive receptors (see Table 2-~~10~~ 11).
Valley-Ivyglen	4.11.4.1	4.11-25	Line 21 under heading Construction states: "Implementation of MM NV-3 would reduce impacts from blasting-induced groundborne vibration to less than significant."	SCE suggests the following edits: "Implementation of MM NV-~~3~~2 would reduce impacts from blasting-induced groundborne vibration to less than significant."
Valley-Ivyglen	4.11.4.2	4.11-26	Line 2 under heading Mitigation Measure states: "MM VIG NV-2: Blasting Vibration Control Measures. During final project design, the applicant shall develop a blasting mitigation and monitoring plan to be implemented during blasting activities for the Valley-Ivyglen project."	SCE suggests the following edits: "MM VIG NV-2: Blasting Vibration Control Measures. During final project design, if blasting is proposed the applicant shall develop a blasting mitigation and monitoring plan to be implemented during blasting activities for the Valley-Ivyglen project."
Valley-Ivyglen	4.11.4.1	4.11-27	Line 22 under heading Construction states: "...vicinity during overall 27-month construction period."	To be consistent with the changes in the Project Description, SCE suggests the following edits: "...vicinity during overall ~~27~~28-month construction period."
Valley-Ivyglen	4.11.4.2	4.11-29	Line 7 under heading Construction states: "Increases would be greater where blasting would occur, which could be along 115-kV Segments VIG1, VIG2, VIG5, VIG6, and VIG8. Blasting would result in high instantaneous noise levels of 94 dBA at 50 feet per blasting event (FHWA 2006). The nearest sensitive receptors to blasting sites are located at 47 feet from	Per Table 2-11, the nearest sensitive receptors are located between 65 to 90 feet from the proposed blasting locations. SCE suggests the following edits: "Increases would be greater where blasting would occur, which could be along 115-kV Segments VIG1, VIG2, VIG5, VIG6, and VIG8. Blasting would result in high instantaneous noise levels of

Project	Section	Page	DEIR Language	SCE Recommended Language
			segments VIG1 and VIG2, resulting in levels significantly above ambient noise levels during blasting events. MM NV-2 would require the applicant to implement control measures that would reduce potential groundborne vibration and associated noise effects from blasting. However, implementation of this mitigation measure would not reduce noise levels to less than 10 dBA above ambient noise levels. Although blasting events would be short-term and infrequent, impacts on ambient noise levels would be significant and unavoidable for this specific activity."	94 dBA at 50 feet per blasting event (FHWA 2006). The nearest sensitive receptors to blasting sites are located at 65 ~~47~~ feet from segment~~s VIG1 and~~ VIG2, resulting in levels significantly above ambient noise levels during blasting events. MM NV-2 would require the applicant to implement control measures that would reduce potential groundborne vibration and associated noise effects from blasting. However, implementation of this mitigation measure would ~~not~~ reduce noise levels to less than 10 dBA above ambient noise levels. Although blasting events would be short-term and infrequent, impacts on ambient noise levels would be significant and unavoidable for this specific activity."
Alberhill	4.11.5.1	4.11-31	Line 28 under heading Project Commitments (Alberhill Project) states: "Project Commitment H: Noise Control • All construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and all legally proclaimed holidays. If the California Independent System Operator (CAISO) and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday, SCE would obtain variances from all applicable jurisdictions. • 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. • Construction traffic shall be routed away from residences and schools where feasible. • Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. A "common sense" approach to vehicle use shall be applied; if a vehicle is not required for use immediately or continuously for	For consistency with Section 2.6, SCE suggests the following edits: "Project Commitment H: Noise Control. • All construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and ~~all legally proclaimed~~ holidays recognized by the local jurisdictions. ~~If the California Independent System Operator (CAISO) and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday, SCE would obtain variances from all applicable jurisdictions.~~ In the event that construction activities are necessary on days or hours outside of what is specified by the local ordinance, SCE would provide advanced notification, including a general description of the work to be performed, location and hours of construction anticipated, to the CPUC, the local jurisdiction, and residents within 300 feet of the anticipated work. • 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. • Construction traffic shall be routed away from residences and schools where feasible.

Project	Section	Page	DEIR Language	SCE Recommended Language
			construction activities, its engine should be shut off. Note: certain equipment, such as large diesel-powered vehicles require extended idling for warm-up and repetitive construction tasks. • The applicant will notify all receptors within 500 feet of construction of the potential to experience significant noise levels during construction. • During construction, the applicant will use sound walls, noise-reduction blankets, or other noise reduction measures prior to developing the project site in areas where sensitive receptors would be subjected to significant noise impacts. • The applicant would shield small stationary equipment with portable barriers within 100 feet of residences. • The applicant would minimize engine idling and turn off engines when not in use. • Where blasting is required, the applicant would conduct additional pre-blast notification and coordination with residents, utilities, and others that may be affected by blasting operations."	• Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. A "common sense" approach to vehicle use shall be applied; if a vehicle is not required for use immediately or continuously for construction activities, its engine should be shut off. Note: certain equipment, such as large diesel-powered vehicles require extended idling for warm-up and repetitive construction tasks. • The applicant will notify all receptors within 3~~5~~00 feet of construction of the potential to experience significant noise levels during construction. • During construction, the applicant will use a temporary noise barrier between the construction area and the residence ~~sound walls, noise-reduction blankets, or other noise-reduction measures prior to developing the project site~~ in areas where sensitive receptors would be subjected to significant noise impacts. • The applicant would shield small stationary equipment with portable barriers within 100 feet of residences, where feasible. • The applicant would minimize engine idling and turn off engines when not in use. • Where blasting is required, the applicant would conduct additional pre-blast notification and coordination with residents, utilities, and others that may be affected by blasting operations."
Alberhill	4.11.5.1	4.11-32	Line 23 under heading Construction states: "...installation would occur in 12-month periods)."	SCE suggests the following edits: "...installation would occur in ~~12~~17-month periods)."
Alberhill	4.11.5.3	4.11-35	Line 1 under heading Operation and Maintenance states: "Alberhill Substation	SCE suggests following edits: "Alberhill Substation

Project	Section	Page	DEIR Language	SCE Recommended Language
			Operation of the Alberhill Substation would create noise due to equipment running at the substation. Continuous operation of the Alberhill Substation would also increase ambient noise levels as a result of transformer "hum" and cooling fan noise. A noise modeling study conducted for the project predicts that the noise contribution from the two 500/115-kV 560 megavolt-ampere (MVA) transformers would be about 94 dBA at a distance of 3 feet from the transformer, being perceived at a level of 38 dBA at the closest sensitive receptor. The substation perimeter wall surrounding the transformer and switching equipment would attenuate noise by 10 dBA. Therefore, projected operational noise levels for the proposed substation would not exceed the nighttime worst-case levels set by Policy N4.1 of the Noise Element of the Riverside County General Plan (45 dBA-10-minute Leq). With the proposed 2-transformer configuration, potential impacts from operational noise at the proposed Alberhill Substation would be less than significant. Future expansion to a 1,680 MVA substation could occur at some future date depending on need, as described in Chapter 2, "Project Description." Such expansion would require one additional transformer for a total of three. The addition of one identical source of noise have the potential to result in cumulative noise levels above the nighttime levels set by Policy N4.1 of the Noise Element of the Riverside County General Plan (45 dBA). With implementation of MM NV-3, potential impacts from operational noise at the expanded Alberhill Substation would be reduced to less than significant."	Operation of the Alberhill Substation would create noise due to equipment running at the substation. Continuous operation of the Alberhill Substation would also increase ambient noise levels as a result of transformer "hum" and cooling fan noise. A noise modeling study conducted for the project predicts that the noise contribution from the two 500/115-kV 560 megavolt-ampere (MVA) transformers would be about 94 dBA at a distance of 3 feet from the transformer, being perceived at a level of 38 dBA at the closest sensitive receptor. The substation perimeter wall surrounding the transformer and switching equipment would attenuate noise by 10 dBA. Therefore, projected operational noise levels for the proposed substation would not exceed the nighttime worst-case levels set by Riverside County Noise Ordinance 847~~Policy N4.1 of the Noise Element of the Riverside County General Plan~~ (~~45~~55 dBA~~ 10-minute Leq~~ Lmax). With the proposed 2-transformer configuration, potential impacts from operational noise at the proposed Alberhill Substation would be less than significant. Future expansion to a 1,680 MVA substation could occur at some future date depending on need, as described in Chapter 2, "Project Description." Such expansion would require one additional transformer for a total of three. The addition of one identical source of noise would not have the potential to result in cumulative noise levels above the nighttime levels set by Riverside County Noise Ordinance 847 ~~Policy N4.1 of the Noise Element of the Riverside County General Plan~~ (~~45~~55 dBA). ~~With implementation of MM NV-3,~~ P~~p~~otential impacts from operational noise at the expanded Alberhill Substation would be ~~reduced to~~ less than significant."
Alberhill	4.11.5.1	4.11-35	Line 28 under heading 500-kV Transmission Lines states: "The closest receptor is 23 feet from the location of Transmission Line VA, and there is a potential for the audible noise levels to exceed the nighttime standard set by Policy N4.1 of the Noise Element of the Riverside County General Plan.	SCE suggests the following edits: "Riverside County Noise Ordinance 847 states: "No person shall create any sound, or allow the creation of any sound, on any property that causes the exterior sound level on any other occupied property to exceed the sound level standards set forth in

Project	Section	Page	DEIR Language	SCE Recommended Language
			The policy prohibits facility-related noise levels, received by any sensitive use, from exceeding a standard of 45 dBA-10-minute Leq between 10:00 p.m. and 7:00 a.m. This would be a significant impact. MM NV-4 would require the applicant to use additional insulation equipment to reduce corona noise to levels in compliance with Riverside County General Plan Policy N4.1. Impacts on noise standards from the operation of the 500-kV transmission lines would be less than significant with implementation of MM NV-4."	Table 1." Table 1 lists a max db level of 55 for LI properties between 10 pm and 7 am. After construction, t~~T~~he closest receptor is ~~23~~ over 300 feet from the ~~location of~~ Transmission Line VA right-of-way, ~~and there is a potential for~~ at which distance the audible noise levels would not ~~to~~ exceed the nighttime standard set by Riverside County Noise Ordinance 847 ~~Policy N4.1 of the Noise Element of the Riverside County General Plan~~. ~~The policy prohibits facility-related noise levels, received by any sensitive use, from exceeding a standard of 45 dBA-10-minute Leq between 10:00 p.m. and 7:00 a.m. This would be a significant impact. MM NV-4 would require the applicant to use additional insulation equipment to reduce corona noise to levels in compliance with Riverside County General Plan Policy N4.1.~~ Impacts on noise standards from the operation of the 500-kV transmission lines would be less than significant ~~with implementation of MM NV-4~~."
Alberhill	4.11.5.3	4.11-35	Line 38 under heading 115-kV Subtransmission Line states: "Audible noise levels from the 115-kV subtransmission line segments are expected to be relatively low, generally less than 34 dBA in rainy condition directly below the conductor. Corona noise would not be perceptible against applicable stationary source noise standards in Riverside County and City of Menifee (45 dBA-10-minute Leq from 10:00 p.m. to 7:00 a.m.). In addition, noise from vehicles used during routine maintenance activities would be infrequent would not result in a noticeable increase in noise. Noise from these sources would be limited and short-term, but have the potential to exceed noise standards in the City of Lake Elsinore, for those activities occurring within 50 feet from sensitive receptors. Implementation of MM NV-1 would reduce noise from maintenance activities to levels that are in compliance with the applicable noise ordinances. Therefore, operation and maintenance noise impacts would be less than significant after mitigation."	The previous sentences state no noticeable increase in noise, therefore the impact would be less than significant. SCE suggests the following edits: "Audible noise levels from the 115-kV subtransmission line segments are expected to be relatively low, generally less than 34 dBA in rainy condition directly below the conductor. Corona noise would not be perceptible against applicable stationary source noise standards in Riverside County and City of Menifee (~~45~~55 dBA~~-10-minute Leq~~ Lmax from 10:00 p.m. to 7:00 a.m.). In addition, noise from vehicles used during routine maintenance activities would be infrequent would not result in a noticeable increase in noise. ~~Noise from these sources would be limited and short-term, but have the potential to exceed noise standards in the City of Lake Elsinore, for those activities occurring within 50 feet from sensitive receptors. Implementation of MM NV-1 would reduce noise from maintenance activities to levels that are in compliance with the applicable noise ordinances.~~ Therefore,

Project	Section	Page	DEIR Language	SCE Recommended Language
				operation and maintenance noise impacts would be less than significant ~~after mitigation~~."
Alberhill	4.11.5.3	4.11-36	Line 15 under heading Mitigation Measures states: "MM NV-3 Low-Noise Substation Equipment and Noise Barriers. The applicant shall ensure that the Alberhill Substation operational noise levels will not exceed 45 dBA-10-minute Leq at the closest sensitive receptor, as specified in Riverside County General Plan Policy N4.1. This shall be achieved either through use of low-noise substation equipment or installation of noise barriers or both. The applicant shall conduct monitoring and reporting of operational noise levels at the substation according to the specifications in the Riverside County General Plan Appendix I and the Riverside County Department of Public Health "Requirement for Determining and Mitigating Non-Transportation Noise Source Impacts to Residential Properties."	The operations of Alberhill Substation noise levels will not exceed 55 dBA Lmax at the nearest sensitive receptor which is over 1000 feet per the Riverside County Noise Ordinance No. 847. Therefore this mitigation measure would not be required. SCE suggests the following edits: ~~"MM NV-3 Low-Noise Substation Equipment and Noise Barriers. The applicant shall ensure that the Alberhill Substation operational noise levels will not exceed 45 dBA-10-minute Leq at the closest sensitive receptor, as specified in Riverside County General Plan Policy N4.1. This shall be achieved either through use of low-noise substation equipment or installation of noise barriers or both. The applicant shall conduct monitoring and reporting of operational noise levels at the substation according to the specifications in the Riverside County General Plan Appendix I and the Riverside County Department of Public Health "Requirement for Determining and Mitigating Non-Transportation Noise Source Impacts to Residential Properties."~~
Alberhill	4.11.5.3	4.11-36	Line 24 under heading Mitigation Measures states: "MM NV-4 Corona Noise Reduction Insulators. The applicant shall ensure that the Alberhill System 500-kV transmission line corona audible noise levels will not exceed 45 dBA-10-minute Leq at the closest sensitive receptor, as specified in Riverside County General Plan Policy N4.1. This shall be achieved by the use of additional insulation equipment and additional technological solutions to reduce corona noise levels during rainy and fair weather conditions. To verify the efficiency of the corona noise reduction equipment, the applicant will measure operational noise levels at the closest sensitive residential receptors from the Alberhill Substation during three rain events during the first two rainy seasons when the substation is operating. Monitoring reports shall indicate the existing ambient noise levels and weather conditions during measurements. The	The operations of Alberhill System 500-kV Transmission Line noise levels will not exceed 55 dBA Lmax at the nearest sensitive receptor which is over 300 feet per the Riverside County Noise Ordinance No. 847. Therefore this mitigation measure would not be required. SCE suggests the following edits: ~~"MM NV-4 Corona Noise Reduction Insulators. The applicant shall ensure that the Alberhill System 500-kV transmission line corona audible noise levels will not exceed 45 dBA-10-minute Leq at the closest sensitive receptor, as specified in Riverside County General Plan Policy N4.1. This shall be achieved by the use of additional insulation equipment and additional technological solutions to reduce corona noise levels during rainy and fair weather conditions. To verify the efficiency of the corona noise reduction equipment, the applicant will measure operational noise levels at the closest sensitive residential~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			applicant shall conduct noise level measurements in compliance with the County of Riverside requirements, as applicable. The applicant will submit results of the monitoring to the CPUC annually. If the monitoring reports determine that the corona noise levels exceed 45 dBA at sensitive residential receptors, the applicant will implement additional technological solutions and installation equipment and will repeat the measuring of operational noise levels at the closest sensitive residential receptors from the Alberhill Substation during three rain events during the subsequent two rainy seasons, until the 45 dBA threshold is no longer exceeded during rain events."	~~receptors from the Alberhill Substation during three rain events during the first two rainy seasons when the substation is operating. Monitoring reports shall indicate the existing ambient noise levels and weather conditions during measurements. The applicant shall conduct noise level measurements in compliance with the County of Riverside requirements, as applicable. The applicant will submit results of the monitoring to the CPUC annually. If the monitoring reports determine that the corona noise levels exceed 45 dBA at sensitive residential receptors, the applicant will implement additional technological solutions and installation equipment and will repeat the measuring of operational noise levels at the closest sensitive residential receptors from the Alberhill Substation during three rain events during the subsequent two rainy seasons, until the 45 dBA threshold is no longer exceeded during rain events~~."
Alberhill	4.11.5.1	4.11-43	Line 24 under heading 500-kV Transmission Lines states: "Helicopter takeoff and landing areas would be limited to established helicopter landing areas (e.g., facilities at Skylark Field Airport) or at Staging Areas ASP1 or ASP3. The applicant would use best management practices to minimize impacts caused by the use of helicopters including: using helicopters with low-emitting engines to the extent practical; efficiently maximizing flight times; designating flight paths away from residential areas; identifying sensitive receptors that might be disturbed by construction noise and proving advance notice of upcoming work; and obtaining variances to local noise ordinances as required. The helicopters would be used only during daylight hours consistent with applicable laws and regulations; however, helicopters would increase ambient noise levels in 10 dBA or more during landing/take-off operations at staging areas, and when flying over residential areas at a height of 500 feet. Impacts from helicopters would be temporary, but significant and unavoidable."	To be consistent with Project Commitment H, SCE suggests the following edits: "Helicopter takeoff and landing areas would be limited to established helicopter landing areas (e.g., facilities at Skylark Field Airport) or at Staging Areas ASP1 or ASP3. The applicant would use best management practices to minimize impacts caused by the use of helicopters including: ~~using helicopters with low-emitting engines to the extent practical;~~ Maximize the efficient use of ~~efficiently maximizing~~ flight times; designating flight paths away from residential areas; identifying sensitive receptors that might be disturbed by construction noise and ~~proving~~ providing advance notice of upcoming work~~; and obtaining variances to local noise ordinances as required~~. The helicopters would be used only during daylight hours consistent with applicable laws and regulations; however, helicopters would increase ambient noise levels in 10 dBA or more during landing/take-off operations at staging areas, and when flying over residential areas at a height of 500 feet. Impacts from helicopters would be temporary, but significant and unavoidable."

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.12.2.3	4.12-2	Line 1 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen	4.12.4	4.12-4	Line 28 under heading Construction states: "…the proposed project area would have enough temporary housing to accommodate the 125 construction workers during the 27-month construction period (Table 4.12-2)."	SCE suggests the following edits: "…the proposed project area would have enough temporary housing to accommodate the 125 construction workers during the28 ~~27~~-month construction period (Table 4.12-2)."
Alberhill/ Valley-Ivyglen	4.13.2.3	4.13-6	Line 1 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with

Project	Section	Page	DEIR Language	SCE Recommended Language
				local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen	4.13.4.2	4.13-10	Line 4 under heading Impacts Analysis (Valley-Ivyglen Project) states: "Implementation of MM HZ-4 (Fire Control and Emergency Response) would require the applicant to develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies during construction, operation, and maintenance of the proposed Valley–Ivyglen Project."	SCE suggests the following edits: "Implementation of MM HZ-4 (Fire Control and Emergency Response) would require the applicant to develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies during construction~~,~~ ~~operation, and maintenance~~ of the proposed Valley–Ivyglen Project."
Valley-Ivyglen	4.13.4.2	4.13-10	Line 18 under heading Schools, Libraries, Parks and Other Public Facilities states: "If the applicant's Alhambra construction crew or a non-local contractor is used during construction, workers would temporarily relocate to the proposed project area for the duration of construction, approximately 27 months."	Per SCE project description edits submitted in September 2015, SCE suggests the following edits: "If the applicant's Alhambra construction crew or a non-local contractor is used during construction, workers would temporarily relocate to the proposed project area for the duration of construction, approximately 28 ~~27~~ months."
Valley-Ivyglen	4.13.4.2	4.13-10	Line 20 under heading Schools, Libraries, Parks and Other Public Facility states: "...approximately 27 months."	SCE suggests the following edits: "...approximately ~~27~~ 28 months."
Valley-Ivyglen	4.13.4.2	4.13-11	Line 18 under heading Impact PS-3 (VIG) states: "Drainage facilities (e.g., berms or swales) would be installed along access roads in accordance with the SWPPP and as determined during final engineering based on geotechnical study results (Project Commitment F). The applicant would develop and implement approved grading plans (Project Commitment E) that would be designed to maintain existing storm water drainage	SCE suggests the following edits: "Drainage facilities (e.g., berms or swales) would be installed along access roads in accordance with the ~~SWPPP and as determined during final engineering based on geotechnical study results (Project Commitment F). The applicant would develop and implement approved~~ grading plans (Project Commitment E) that would be designed to maintain existing storm water drainage

Project	Section	Page	DEIR Language	SCE Recommended Language
			patterns. Implementation of MM BR-1 (Limit Construction to Designated Areas), MM BR-15 (SWPPP Best Management Practices), and MM AE-6 (Hillside and Natural Slope Preservations) would further reduce impacts associated with storm water. The applicant would construct all drainage facilities in accordance with NPDES and grading permits and as directed by the Santa Ana Regional Water Quality Control Board, Riverside County Flood Control and Water Conservation District, and Riverside County Planning Department."	patterns. Appropriate best management practices (BMPs) (e.g., the installation of silt fencing and covering of spoil piles) would be developed to minimize impacts associated with storm water runoff. Implementation of MM BR-1 (Limit Construction to Designated Areas), ~~MM BR-15 (SWPPP Best Management Practices),~~ ~~and MM AE-6 (Hillside and Natural Slope Preservations)~~ would further reduce impacts associated with storm water. The applicant would construct all drainage facilities in accordance with NPDES and grading permits and as directed by the Santa Ana Regional Water Quality Control Board~~,~~ and Riverside County Flood Control and Water Conservation District~~, and Riverside County Planning Department~~."
Valley-Ivyglen	4.13.4.2	4.13-11	Line 40 under heading Mitigation Measures states: "MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."	SWPPP is required by law and should not be a mitigation measure. SCE suggests the following edits: ~~"MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs)."~~
Valley-Ivyglen	4.13.4.2	4.13-12	Line 8 under heading Impact PS-4 (VIG) states: "For construction outside of the EVMWD's boundary, the EMWD currently has sufficient water to serve the proposed Alberhill Project (Sigwalt 2015)."	Since this discussion is under the Valley-Ivyglen analysis, SCE suggests the following edits: "For construction outside of the EVMWD's boundary, the EMWD currently has sufficient water to serve the proposed Valley-Ivyglen ~~Alberhill~~ Project (Sigwalt 2015)."
Alberhill	4.13.5.2	4.13-14	Line 22 under heading Fire, Police and Emergency Services states: "Implementation of MM HZ-4 (Fire Control and Emergency Response) would require the applicant to develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies during construction, operations, and maintenance of the proposed Alberhill Project."	SCE suggests the following edits: "Implementation of MM HZ-4 (Fire Control and Emergency Response) would require the applicant to develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies during construction~~, operations, and maintenance~~ of the proposed Alberhill Project."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

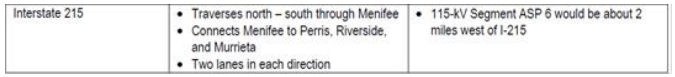
DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	4.13.5.2	4.13-14	Line 14 under heading Fire, Police and Emergency Services states: "...an 8-foot-high perimeter wall of concrete panels or decorative block that would surround the proposed Alberhill Substation with barbed wire affixed near the tip inside perimeter of the wall (SCE 2011);"	Per Data Request response G4, SCE suggests the following edits: "..a~~n~~ minimum 8-foot-high perimeter wall of concrete panels or decorative block that would surround the proposed Alberhill Substation with barbed wire and/or a top guard (e.g., barbed wire or spiked strips) would be affixed to ~~near the tip inside~~ the perimeter of the wall (SCE ~~2011~~2015);"
Alberhill	4.13.5.2	4.13-15	Line 37 under heading Impact PS-3 (ASP) states: "All drainage facilities would be installed as required by the SWPPP and as determined during final engineering based on geotechnical study results (Project Commitment F). The applicant would consult with Riverside County prior to finalizing drainage designs and would submit grading plans to the county for approval (Project Commitment E). Implementation of MM BR-1 (Limit Construction to Designated Areas), MM BR-15 (SWPPP Best Management Practices), and MM AE-6 (Hillside and Natural Slope Preservations) would further reduce impacts associated with storm water."	SCE suggests the following edits: "All drainage facilities would be installed ~~as required by the SWPPP and~~ as determined during final engineering ~~based on geotechnical study results (Project Commitment F)~~. The applicant would consult with Riverside County prior to finalizing drainage designs ~~and would submit grading plans to the county for approval~~ (Project Commitment E). Appropriate best management practices (BMPs) (e.g., the installation of silt fencing and covering of spoil piles) would be developed to minimize impacts associated with storm water runoff. Implementation of MM BR-1 (Limit Construction to Designated Areas), ~~MM BR-15 (SWPPP Best Management Practices), and MM AE-6 (Hillside and Natural Slope Preservations)~~ would further reduce impacts associated with storm water."
Alberhill	4.13.5.2	4.13-16	Line 32 under heading Impact PS-4 (ASP) states: "Construction of the 500-kV meter would also utilize water from the stand tank."	SCE suggests the following edits: "Construction of the 500-kV transmission line ~~meter~~ would also utilize water from the stand tank."
Alberhill	4.13.5.2	4.13-16	Line 10 under heading Mitigation Measures states: MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).	SCE suggests the following edits: ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~
Alberhill	4.14	4.14-1	Line 18 under heading Recreation states: "The proposed Alberhill Project includes the installation of a microwave antenna at the Serrano Substation in the City of	The Cleveland National Forest impacts are analyzed in Section 4.14, SCE recommends the following edits:

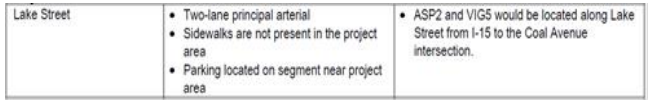
Project	Section	Page	DEIR Language	SCE Recommended Language
			Orange. Because the antenna would be installed on an existing structure and the construction and operation activities associated with the microwave antenna would have no impact on recreation, this component of the proposed Alberhill Project is not discussed further in this section."	~~The proposed Alberhill Project includes the installation of a microwave antenna at the Serrano Substation in the City of Orange. Because the antenna would be installed on an existing structure and the construction and operation activities associated with the microwave antenna would have no impact on recreation, this component of the proposed Alberhill Project is not discussed further in this section.~~
Alberhill/ Valley-Ivyglen	4.14.2.2	4.14-4	Line 16 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen	4.14.4	4.14-6	Line 7 under heading Construction states: "…duration of construction, approximately 27 months."	Per SCE project description edits submitted in September 2015, SCE suggests the following edits: "…duration of construction, approximately 28 ~~27~~months."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr>
<td>Valley-Ivyglen</td>
<td>4.15.1.1</td>
<td>4.15-2</td>
<td>In Table 4.15-1 Highways in Vicinity of Proposed Project
Under Adjacent Project Component column, Interstate 215 row
 
<table>
<tr><td>Interstate 215</td><td>• Traverses north – south through Menifee
• Connects Menifee to Perris, Riverside, and Murrieta
• Two lanes in each direction</td><td>• 115-kV Segment ASP 6 would be about 2 miles west of I-215</td></tr>
</table></td>
<td>Please add the following bullet:

<u>115-kV Segment VIG1 crosses Interstate 215</u>

<table>
<tr><td>Interstate 215</td><td>• Traverses north – south through Menifee
• Connects Menifee to Perris, Riverside, and Murrieta
• Two lanes in each direction</td><td>• 115-kV Segment ASP 6 would be about 2 miles west of I-215
• <u>115-kV Segment VIG1 crosses Interstate 215</u></td></tr>
</table></td>
</tr>
<tr>
<td>Alberhill/ Valley-Ivyglen</td>
<td>4.15.1.1</td>
<td>4.15-3</td>
<td>Table 4.15-2 Local Roadways Impacted
Under Adjacent Project Component column, Lake Street row in City of Lake Elsinore
ASP2 and VIG5 would be located along Lake Street from I-15 to the Coal Avenue intersection
 
<table>
<tr><td>Lake Street</td><td>• Two-lane principal arterial
• Sidewalks are not present in the project area
• Parking located on segment near project area</td><td>• ASP2 and VIG5 would be located along Lake Street from I-15 to the Coal Avenue intersection.</td></tr>
</table></td>
<td>SCE suggests the following edits:

ASP2 and VIG5 would be located along Lake Street from I-15 to the <u>Nichols Road</u> <s>Coal Avenue</s> intersection

<table>
<tr><td>Lake Street</td><td>• Two-lane principal arterial
• Sidewalks are not present in the project area
• Parking located on segment near project area</td><td>• ASP2 and vig5 would be located along Lake Street from I-15 to the <u>Nichols Road</u> <s>Coal Avenue</s> intersection</td></tr>
</table></td>
</tr>
</table>

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	4.15.2.3	4.15-13	Line 31 under heading Regional and Local	Since the Project is under the jurisdiction of the CPUC and local agencies do not have jurisdiction over the Project, please add the following text under the Regional and Local Subheading: "The CPUC has sole and exclusive state jurisdiction over the siting and design of the proposed Project. Pursuant to General Order No. 131-D, Section XIV.B, "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 CPUC's jurisdiction. However, in locating such projects, the public utilities are directed to consider local regulations and consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and cities' regulations are not applicable as the county and cities do not have jurisdiction over the proposed Project. Accordingly, a discussion of local land use regulations is provided in the following subsections for informational purposes only."
Valley-Ivyglen	4.15.4.2	4.15-19	Line 38 under heading Construction states: "The applicant estimates that during the 27-month construction period, the…"	SCE suggests the following edits: "The applicant estimates that during the 28 ~~27~~-month construction period, the…"
Alberhill and Valley-Ivyglen	4.15.4.2	4.15-23	Line 14 under heading Mitigation Measure states: "MM TT-1: Traffic Management and Control Plan. The applicant shall prepare a Traffic Management and Control Plan that shall include, at a minimum, measures to ensure that: • Traffic flow, bicycle access, and pedestrian access is not completely restricted on any roadway for longer than 15 minutes, or a detour is provided; • Emergency access is maintained at all times; and • Lane closures do not create safety hazards.	Traffic control is the responsibility of Cal Trans and local governing agencies. The CPUC should not have responsibility or liability for establishing or monitoring traffic control requirements which is a local jurisdictional issue. SCE will maintain traffic control with guidance from the California Joint Utility Traffic Control Manual and/or Traffic Control Plan approved by the governing agency. Accordingly, please remove measure: ~~MM TT-1: Traffic Management and Control Plan. The applicant shall prepare a Traffic Management and Control Plan that shall include, at a minimum, measures to ensure that:~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			In addition to measures required by agencies with jurisdictions over the project, this plan will, at a minimum: • Include a discussion of work hours, haul routes, work area delineation, traffic control, and flagging; • Identify all access and parking restriction and signage requirements; • Require workers to park personal vehicles at the approved staging area and take only necessary project vehicles to the work sites; • Lay out plans for pre-construction notifications to and a process for communication with affected residents and landowners. Advance public notification shall include posting of notices and appropriate signage regarding construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which roads/lanes and access point/driveways/parking areas would 1 be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints; • Require posting of warning signs so that motorists are prepared for slow trucks; • Require notification of emergency service providers regarding the timing, location, and duration of construction activities. • Require all roads to remain passable to emergency service vehicles at all times; • Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow; • Require emergency vehicle access to be maintained at all times; • Encourage full use of the full roadway width that existed prior to construction during nonworking hours, if possible; • Restrict deliveries of large equipment during peak traffic hours to the extent feasible in accordance with applicable local ordinances;	• ~~Traffic flow, bicycle access, and pedestrian access is not completely restricted on any roadway for longer than 15 minutes, or a detour is provided;~~ • ~~Emergency access is maintained at all times; and~~ • ~~Lane closures do not create safety hazards.~~ ~~In addition to measures required by agencies with jurisdictions over the project, this plan will, at a minimum:~~ • ~~Include a discussion of work hours, haul routes, work area delineation, traffic control, and flagging;~~ • ~~Identify all access and parking restriction and signage requirements;~~ • ~~Require workers to park personal vehicles at the approved staging area and take only necessary project vehicles to the work sites;~~ • ~~Lay out plans for pre-construction notifications to and a process for communication with affected residents and landowners. Advance public notification shall include posting of notices and appropriate signage regarding construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which roads/lanes and access point/driveways/parking areas would 1 be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints;~~ • ~~Require posting of warning signs so that motorists are prepared for slow trucks;~~ • ~~Require notification of emergency service providers regarding the timing, location, and duration of construction activities.~~ • ~~Require all roads to remain passable to emergency service vehicles at all times;~~ • ~~Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow;~~ • ~~Require emergency vehicle access to be maintained at all times;~~

Project	Section	Page	DEIR Language	SCE Recommended Language
			• Ensure that traffic control is performed in accordance with final engineering plans and approved drawings attached to any permit issued; • When required, such as during egress of slow traffic onto public roadways, traffic shall be controlled by flaggers who shall be in constant communication with each other during flagging operations; • Require removal of all dirt from the roadway each day before the completion of work; and • Require streets to be maintained in drivable condition at all times."	• ~~Encourage full use of the full roadway width that existed prior to construction during nonworking hours, if possible;~~ • ~~Restrict deliveries of large equipment during peak traffic hours to the extent feasible in accordance with applicable local ordinances;~~ • ~~Ensure that traffic control is performed in accordance with final engineering plans and approved drawings attached to any permit issued;~~ • ~~When required, such as during egress of slow traffic onto public roadways, traffic shall be controlled by flaggers who shall be in constant communication with each other during flagging operations;~~ • ~~Require removal of all dirt from the roadway each day before the completion of work; and~~ ~~Require streets to be maintained in drivable condition at all times.~~
Alberhill and Valley-Ivyglen	4.15.4.2	4.15-27	Line 12 under heading Mitigation Measures states: "MM TT-2: Heavy Vehicle Traffic Restrictions. The applicant shall coordinate with Caltrans and the City of Lake Elsinore to restrict heavy vehicle traffic for the project at the Lake Street and I-15 northbound ramp during the AM peak hour (7:00 AM to 9:00 AM) for the duration of project construction. Heavy vehicles traveling to project sites during the AM peak hour shall be diverted to the Indian Truck Trail and I-15 northbound ramp. Prior to the start of construction, the applicant shall alert truck drivers associated with the project of this restriction and shall install temporary signage on Lake Street notifying project drivers of this restriction. The applicant shall also restrict construction traffic for the project at the Menifee Road and SR-74 intersection during the PM peak hour (4:00 PM to 6:00 PM). The applicant may require construction traffic to exit Staging Area ASP7 and Staging Area VIG2 prior to 4:00 PM or after 6:00 PM. Alternatively, the applicant may provide an alternative access route via Case Road to the Ethanac Road and I-15 interchange."	For flexibility, SCE suggests the following edits: "MM TT-2: Heavy Vehicle Traffic Restrictions. The applicant shall ~~coordinate with Caltrans and the City of Lake Elsinore to restrict~~ minimize heavy vehicle traffic for the project at the Lake Street and I-15 northbound ramp during the AM peak hour (7:00 AM to 9:00 AM) for the duration of project construction. Heavy vehicles traveling to project sites during the AM peak hour shall be diverted to the Indian Truck Trail and I-15 northbound ramp. Prior to the start of construction, the applicant shall alert truck drivers associated with the project.~~ of this restriction and shall install temporary signage on Lake Street notifying project drivers of this restriction~~. The applicant shall also ~~restrict~~ minimize construction traffic for the project at the Menifee Road and SR-74 intersection during the PM peak hour (4:00 PM to 6:00 PM). The applicant may require construction traffic to exit Staging Area ASP7 and Staging Area VIG2 prior to 4:00 PM or after 6:00 PM. Alternatively, the applicant may provide an alternative access route ~~via Case Road to the Ethanac Road and I-15 interchange~~."

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill and Valley-Ivyglen	4.15.4.2	4.15-27	Line 26 under heading Mitigation Measures states: "MM TT-3: Highway Closure Plan. At least 30 days prior to initiating installation of crossings of I-15 and SR-74, the applicant shall prepare and submit to Caltrans a Highway Closure Plan as part of its Caltrans encroachment permit application. The plan shall ensure that closure or partial closure of I-15 and SR-74 are planned so as to minimize traffic disruption and other hazards to highway users (e.g., construction limited to off-peak, non-daytime hours, from 10 p.m. to 5 a.m., and signage posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements). Highway closure times will be reviewed and approved by Caltrans to minimize delay to I-15 and SR-74 traffic. The plan shall also outline suggested detours for I-15 and SR-74 traffic, including routes and signage. At least 15 days prior to initiating installation of the crossings, the applicant shall provide to the CPUC evidence of Caltrans granting the encroachment permit."	Full and partial highway closures are the responsibility of Caltrans. Accordingly, please remove measure: ~~MM TT-3: Highway Closure Plan. At least 30 days prior to initiating installation of crossings of I-15 and SR-74, the applicant shall prepare and submit to Caltrans a Highway Closure Plan as part of its Caltrans encroachment permit application. The plan shall ensure that closure or partial closure of I-15 and SR-74 are planned so as to minimize traffic disruption and other hazards to highway users (e.g., construction limited to off-peak, non-daytime hours, from 10 p.m. to 5 a.m., and signage posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements). Highway closure times will be reviewed and approved by Caltrans to minimize delay to I-15 and SR-74 traffic. The plan shall also outline suggested detours for I-15 and SR-74 traffic, including routes and signage. At least 15 days prior to initiating installation of the crossings, the applicant shall provide to the CPUC evidence of Caltrans granting the encroachment permit.~~
Alberhill and Valley-Ivyglen	4.15.4.2	4.15-29	Line 7 under heading Mitigation Measures states: "MM TT-4: Helicopter Lift Plan. SCE's helicopter contractor shall coordinate with the FAA and obtain FAA-required approvals for helicopter operations. The applicant contractor's submittal to the FAA shall include a Helicopter Lift Plan for operations within 1,500 feet of a congested area or within 1,500 feet of residences in compliance with 14 CFR 133.33, which requires that flights be conducted so emergency landings and release of external load can be accomplished without safety risks to people or property when operating over congested areas. The Helicopter Lift Plan shall include the following measures, to the extent feasible: • Designation of a responsible party for equipment inspections;	Per 14 CFR 133.33, helicopter lift plan is required at 500 feet. SCE suggests the following edits: "MM TT-4: Helicopter Lift Plan. SCE's helicopter contractor shall coordinate with the FAA and obtain FAA-required approvals for helicopter operations. The applicant contractor's submittal to the FAA shall include a Helicopter Lift Plan for operations within ~~1,500~~ 500 feet of a congested area or within ~~1,500~~ 500 feet of residences in compliance with 14 CFR 133.33, which requires that flights be conducted so emergency landings and release of external load can be accomplished without safety risks to people or property when operating over congested areas. The Helicopter Lift Plan shall include the following measures, to the extent feasible:

Project	Section	Page	DEIR Language	SCE Recommended Language
			• Communication procedures; • Identification of exclusion zones where pedestrians will not be allowed; and • Training of personnel in safety requirements and procedures. The Helicopter Lift Plan and evidence of FAA approval of the plan shall be provided to the CPUC prior to commencing helicopter operations."	• Designation of a responsible party for equipment inspections; • Communication procedures; • Identification of exclusion zones where pedestrians will not be allowed; and • Training of personnel in safety requirements and procedures. The Helicopter Lift Plan and evidence of FAA approval of the plan shall be provided to the CPUC prior to commencing helicopter operations."
Alberhill and Valley-Ivyglen	4.15.4.2	4.15-29	Line 23 under heading Mitigation Measures states: "MM TT-5. FAA No-Hazard Determination. SCE shall obtain a determination of no hazard from the FAA when notification under 14 CFR 77 is required for: • Use of construction equipment, such as cranes; or • Installation of structures, such as lattice steel towers. SCE shall provide documentation of the FAA finding to the CPUC prior to the use of equipment or installation of structures that require notification under 14 CFR 77."	Per Project Commitment G, SCE acknowledged on October 29, 2015 to the CPUC that we would consult with the FAA prior to construction. SCE will review all recommendations and/or determinations from the FAA and mark and/or light the FAA recommended components where reasonable and feasible. Therefore, MM TT-5 is not necessary. SCE suggests the following edits: ~~MM TT-5. FAA No-Hazard Determination. SCE shall obtain a determination of no hazard from the FAA when notification under 14 CFR 77 is required for:~~ ~~• Use of construction equipment, such as cranes; or~~ ~~• Installation of structures, such as lattice steel towers.~~ ~~SCE shall provide documentation of the FAA finding to the CPUC prior to the use of equipment or installation of structures that require notification under 14 CFR 77.~~
Alberhill and Valley-Ivyglen	4.15.4.2	4.15-29	Line 30 under heading Mitigation Measure states: "MM TT-6: Road Damage Repair. SCE shall restore and repair to pre-project conditions any roads damaged by project vehicle traffic. SCE shall document roadway conditions with photographs prior to the project along roads identified for heavy vehicle use in the project's Traffic Impact Analysis. SCE shall	SCE holds franchise agreements with each city and county and pursuant to these agreements pays a franchise fee for the right to operate and maintain our electrical facilities within the city or county, as well as to access and use public roads. Those access agreements contain conditions related to the restoration and/or repair to pre-project conditions any roads damaged by project vehicle traffic. This mitigation measure is duplicative of the

Project	Section	Page	DEIR Language	SCE Recommended Language
			also take photographs after the project and after completion of any repairs to document restoration of pre-project pavement conditions."	franchise agreements, therefore, SCE requests the CPUC limit this mitigation measure to private roads and revise as follows: "MM TT-6: Road Damage Repair. SCE shall restore and repair to pre-project conditions any private roads damaged by project vehicle traffic. SCE shall document roadway conditions with photographs prior to the project along roads identified for heavy vehicle use in the project's Traffic Impact Analysis. SCE shall also take photographs after the project and after completion of any repairs to document restoration of pre-project pavement conditions."
Valley-Ivyglen	5.2.1	5-5	Line 9 under heading Aesthetics states: "The aesthetic impacts of VIG Alternative A would be similar to those of the proposed Valley-Ivyglen Project. Construction and operation of 115-kV Segment VIG8 would be similar under the alternative and the proposed project, though the location of the alignment would be different. Construction activities and equipment for this alternative would be temporarily visible to motorists on Campbell Ranch Road, and views of the construction area from Interstate 15 (I-15) would be partially obscured by foliage along I-15, similar to the proposed project. VIG Alternative A would not be visible during operation; therefore, it would not impact the visual quality of the surrounding area or create a new source of light or glare. Impacts of VIG Alternative A to aesthetics would therefore be similar to those of the proposed project."	Alternative A would eliminate one freeway crossing (I-15) and should be included in the discussion on Aesthetics. "The aesthetic impacts of VIG Alternative A would be similar to those of the proposed Valley-Ivyglen Project. Construction and operation of 115-kV Segment VIG8 would be similar under the alternative and the proposed project, though the location of the alignment would be different. Construction activities and equipment for this alternative would be temporarily visible to motorists on Campbell Ranch Road, and views of the construction area from Interstate 15 (I-15) would be partially obscured by foliage along I-15, similar to the proposed project. VIG Alternative A would eliminate one freeway crossing (I-15). VIG Alternative A would not be visible during operation; therefore, it would not impact the visual quality of the surrounding area or create a new source of light or glare. Impacts of VIG Alternative A to aesthetics would therefore be less than ~~similar to those of~~ the proposed project."
Valley-Ivyglen Alternative B2	5.2.3	5-11	Line 33 under heading VIG Alternative B2-Santiago Canyon Road Underground and Overhead (115-kV Segment VIG8) states: "…latticework steel (LWS) poles."	SCE suggests the following edits: "…~~latticework~~ lightweight steel (LWS) poles."

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	5.2.4	5-15	Line 4 under heading VIG Alternative C—Underground along Temescal Canyon Road and Horsethief Canyon Road (115-kV Segment VIG 6) states: "VIG Alternative C includes construction of 115-kV Segments VIG1 through VIG5 and VIG7 through VIG 8, as described for the proposed Valley–Ivyglen Project; however, wood poles along a 0.75-mile section of the Valley–Elsinore–Fogarty–Ivyglen115-kV line along Temescal Canyon Road near the western corner of the proposed Alberhill Substation site would be removed, and new underground conduit capable of supporting two 115-kV circuits (the Valley–Elsinore–Fogarty–Ivyglen115-kV line and proposed Valley–Ivyglen115-kV line) would be installed in lieu of Segment 115-kV VIG6 (see Figure 3-2)."	Under this alternative, SCE assumes the existing Fogarty-Ivyglen115-kVSubtransmission Line and the existing fiber optic line would remain overhead along Temescal Canyon Road. The fiber optic line following Valley-Ivyglen would also be placed underground. SCE suggests the following edits: "VIG Alternative C includes construction of 115-kV Segments VIG1 through VIG5 and VIG7 through VIG 8, as described for the proposed Valley–Ivyglen Project; however, ~~wood poles along a 0.75-mile section of the Valley–Elsinore–Fogarty–Ivyglen115-kV line along Temescal Canyon Road near the western corner of the proposed Alberhill Substation site would be removed, and~~ new underground conduit capable of supporting two 115-kV circuits~~(the Valley–Elsinore–Fogarty–Ivyglen115-kV line and proposed Valley–Ivyglen115-kV line)~~would be installed <u>along Temescal Canyon Road from Concordia Ranch Road to Horsethief Canyon Road to De Palma Road</u> in lieu of Segment 115-kV VIG6 (see Figure 3-2)."
Valley-Ivyglen	5.2.4	5-15	Line 12 under heading Aesthetics states: "Construction activities and equipment for VIG Alternative C would mostly be screened or out of view from motorists along I-15 due to vegetation and topography, which would result in fewer visual impacts than the proposed VIG 115-kV Segment VIG8 construction."	SCE suggests the following edits: "Construction activities and equipment for VIG Alternative C would mostly be screened or out of view from motorists along I-15 due to vegetation and topography, which would result in fewer visual impacts than the proposed VIG 115-kV Segment ~~VIG8~~ <u>VIG 6</u> construction."
Valley-Ivyglen	5.2.4	5-16	Line 16 under heading Cultural Resources states: "VIG Alternative C would require approximately 6.5 percent less ground disturbance than the proposed Valley–Ivyglen Project along 115-kV Segment VIG6. The reduced disturbance performed under VIG Alternative C would occur within the ROW of Temescal Road. The potential of discovering a significant cultural resource along VIG Alternative C is low since the road is either paved or very disturbed. Therefore, VIG Alternative C's potential for impacts to cultural resources would be reduced as compared to the proposed project. Impacts to cultural resources under VIG Alternative C would be reduced to	The potential to impact paleo resources increases with trenching activity because Alternative C would be in the same geological formation (Older Quaternary Deposit) as VIG6. SCE suggests the following edits: "VIG Alternative C would require approximately 6.5 percent less ground disturbance than the proposed Valley–Ivyglen Project along 115-kV Segment VIG6. The reduced disturbance performed under VIG Alternative C would occur within the ROW of Temescal Road. The potential of discovering a significant cultural resource along VIG Alternative C is low since the road is either paved or very disturbed. <u>However, the potential</u>

Project	Section	Page	DEIR Language	SCE Recommended Language
			less than significant with mitigation measures similar to those developed for the proposed Valley–Ivyglen Project."	to encounter and impact paleontological resources would increase due to trenching activity associated with the underground construction required for VIG Alternative C. Therefore, VIG Alternative C's potential for impacts to cultural resources would be similar ~~reduced as compared~~ to the proposed project. Impacts to cultural resources under VIG Alternative C would be reduced to less than significant with mitigation measures similar to those developed for the proposed Valley–Ivyglen Project."
Valley-Ivyglen	5.2.5	5-21	Line 13 under heading Other Resources Area states: "Greenhouse Gases: VIG Alternative M would result in a decrease of greenhouse gas emissions due to less helicopter use and equipment use. However, the decrease would be only slight because equipment would be used for longer periods of time in order to excavate deeper than under the proposed project."	GHG impacts stated should be "Greater". GHG emissions would decrease due to less helicopter usage but the number of excavating construction equipment would still be the same. The GHG impacts are analyzed on an annual basis so comparing the added undergrounding of 26.4 miles for Alternative M compared to the proposed project's 1.9 miles would still have a longer construction duration and therefore, overall emissions would still be greater. Please revise language to clarify as follows: "Greenhouse Gases: VIG Alternative M would result in a decrease of greenhouse gas emissions due to less helicopter use ~~and equipment use~~. However, the ~~decrease would be only slight because~~ equipment would be used for longer periods of time in order to excavate deeper for 26.4 miles than1.9 miles under the proposed project thus, overall emissions would be greater."
Valley-Ivyglen	5.2.5	5-21	Line 20 under heading Other Resources Area states: Public Services and Utilities: VIG Alternative M would involve about 24 percent less ground disturbance than the proposed Valley–Ivyglen Project, which would reduce the amount of water needed to control fugitive dust. However, the construction period would last somewhat longer, which could slightly increase the potential need for police and fire services. Overall, since the reduction in water is substantial, impacts would be reduced.	Trenching, associated with VIG Alternative M, requires longer construction durations, which would result in longer and more extensive lane closures. As with the proposed project, access roads would be required for Segments 1 and 6; therefore, water usage would be similar to the proposed project. Further, the potential to impact unmarked/unmapped underground utilities would be greater. Therefore, SCE suggests editing the section to reflect these potential impacts.

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td>Alberhill</td><td>5.3</td><td>5-24</td><td>Table 5-2 Summary of the Alberhill Project Alternatives Analysis and Determination
Resource Area – Cultural Resources
ASP Alternative DD (Rank) – Reduced (3)
<table><tr><td>Cultural Resources</td><td>Less than significant with mitigation</td><td>Reduced (2)</td><td>Reduced (3)</td><td>No Impact (1)</td><td>ASP Alternative B</td></tr></table></td><td>For consistency of analysis, please revise table as follows:
<table><tr><td>Cultural Resources</td><td>Less than significant impact with mitigation</td><td>Reduced (2)</td><td><s>Reduced (3)</s>

<u>Similar (3)</u></td><td>No Impact (1)</td><td>ASP Alternative B</td></tr></table></td></tr>
<tr><td>Alberhill</td><td>5.3</td><td>5-24</td><td>Table 5-2 Summary of the Alberhill Project Alternatives Analysis and Determination
Resource Area – Geology, Soils and Mineral Resources
ASP Alternative DD (Rank) – Reduced (3)
<table><tr><td>Geology, Soils, and Mineral Resources</td><td>Less than significant with mitigation</td><td>Reduced (2)</td><td>Reduced (3)</td><td>No Impact (1)</td><td>ASP Alternative B</td></tr></table></td><td>Per SCE’s suggested edits to Section 5.3.2, please revise the table as follows:
<table><tr><td>Geology, Soils, and Mineral Resources</td><td>Less than significant impact with mitigation</td><td>Reduced (2)</td><td><s>Reduced (3)</s>

<u>Similar</u></td><td>No Impact (1)</td><td>ASP Alternative B</td></tr></table></td></tr>
<tr><td>Alberhill</td><td>5.3</td><td>5-24</td><td>Table 5-2 Summary of the Alberhill Project Alternatives Analysis and Determination
Resource Area – Greenhouse Gases
ASP Alternative DD (Rank) – Reduced (2)
<table><tr><td>Greenhouse Gases</td><td>Less than significant</td><td>Greater</td><td>Reduced (2)</td><td>No Impact (1)</td><td>ASP Alternative DD</td></tr></table></td><td>Per SCE’s suggested edits to Section 5.3.2, please revise the table as follows:
<table><tr><td>Greenhouse Gases</td><td>Less than significant</td><td>Greater</td><td><s>Reduced (2)</s>

<u>Similar</u></td><td>No Impact (1)</td><td><s>ASP Alternative DD</s>
<u>None</u></td></tr></table></td></tr>
</table>

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

<table>
<tr><th>Project</th><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td>Alberhill</td><td>5.3</td><td>5-24</td><td>Table 5-2 Summary of the Alberhill Project Alternatives Analysis and Determination
Resource Area – Hazards and Hazardous Materials
ASP Alternative DD (Rank) – Reduced (3)
<table><tr><td>Hazards and Hazardous Materials</td><td>Less than significant with mitigation</td><td>Reduced (2)</td><td>Reduced (3)</td><td>No Impact (1)</td><td>ASP Alternative B</td></tr></table></td><td>Per SCE’s suggested edits to Section 5.3.2, please revise the table as follows:
<table><tr><td>Hazards and Hazardous Materials</td><td>Less than significant impact with mitigation</td><td>Reduced (2)</td><td><s>Reduced (3)</s>

Similar</td><td>No Impact (1)</td><td>ASP Alternative B</td></tr></table></td></tr>
<tr><td>Alberhill</td><td>5.3</td><td>5-24</td><td>Table 5-2 Summary of the Alberhill Project Alternatives Analysis and Determination
Resource Area – Hydrology and Water Quality
ASP Alternative DD (Rank) – Reduced (3)
<table><tr><td>Hydrology and Water Quality</td><td>Less than significant with mitigation</td><td>Reduced (2)</td><td>Reduced (3)</td><td>No Impact (1)</td><td>ASP Alternative B</td></tr></table></td><td>Per SCE’s suggested edits to Section 5.3.2, please revise the table as follows:
<table><tr><td>Hydrology and Water Quality</td><td>Less than significant impact with mitigation</td><td>Reduced (2)</td><td><s>Reduced (3)</s>

Greater</td><td>No Impact (1)</td><td>ASP Alternative B</td></tr></table></td></tr>
<tr><td>Alberhill</td><td>5.3</td><td>5-24</td><td>Table 5-2 Summary of the Alberhill Project Alternatives Analysis and Determination
Resource Area – Public Services and Utilities
ASP Alternative DD (Rank) – Reduced (2)
<table><tr><td>Public Services and Utilities</td><td>Less than significant</td><td>Reduced (3)</td><td>Reduced (2)</td><td>No Impact (1)</td><td>ASP Alternative DD</td></tr></table></td><td>Per SCE’s suggested edits to Section 5.3.2, please revise the table as follows:
<table><tr><td>Public Services and Utilities</td><td>Less than significant</td><td>Reduced (3)</td><td><s>Reduced (2)</s>

Similar</td><td>No Impact (1)</td><td>ASP Alternative B <s>DD</s></td></tr></table></td></tr>
</table>

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	5.3.1	5-25	Line 9 under heading Aesthetics states: "The gas-insulated switchgear substation used for ASP Alternative B would require a smaller site than the proposed Alberhill Substation."	SCE suggests the following edits: "The gas-insulated switchgear substation used for ASP Alternative B would require a smaller ~~site~~ footprint than the proposed Alberhill Substation."
Alberhill	5.3.2	5-28	Line 29 under heading ASP Alternative DD—Serrano Commerce Center Substation Site states: "ASP Alternative DD would include construction of a 500/115-kV substation, similar to the proposed Alberhill Substation, in an area covered by Riverside County Specific Plan No. 353 (see Figure 3-3). The 500-kV transmission lines would extend from the substation directly north and tie into the existing Serrano–Valley 500-kV transmission line. 115-kV Segment ASP1 would not be built as proposed. 115-kV Segment ASP1.5 would be expanded to approximately 2 to 4 miles. ASP Alternative DD would involve constructing 115-kV Segment ASP2 aboveground along the path of 115-kV Segments VIG6 and VIG7 instead of crossing I-15. 115-kV Segment ASP2 would be placed below ground with 115-kV Segment VIG8. 115-kV Segment ASP2 would transition to an aboveground power line and would be constructed to follow the planned extension of Temescal Canyon Road, as proposed in Specific Plan No. 353, to the Alberhill substation site."	Consistent with Data Request H, Alternative DD should include an open air 500-kV switchrack. Further, similar to the proposed Alberhill Substation, five subtransmission lines on four power lines would extend from Temescal Canyon Road to Alberhill Substation. SCE suggests the following edits: "ASP Alternative DD would include construction of a 500/115-kV substation, similar to the proposed Alberhill Substation except the 500-kV switchrack would be all open air, in an area covered by Riverside County Specific Plan No. 353 (see Figure 3-3). The initial build of the Alberhill Substation would connect t~~T~~he 500-kV transmission lines ~~would extend~~ from the substation directly north and tie into the existing Serrano–Valley 500-kV transmission line. Up to five 500-kV Transmission Lines, including a future generation interconnection, may connect to the final build of the substation. 115-kV Segments ASP1 and ASP1.5 would not be built as proposed. ~~115-kV Segment ASP1.5 would be expanded to approximately 2 to 4 miles.~~ ASP Alternative DD would involve constructing 115-kV Segment ASP2 aboveground along the path of 115-kV Segments VIG6 and VIG7 ~~instead of crossing I-15~~. 115-kV Segment ASP2 would be placed below ground with 115-kV Segment VIG8~~. 115-kV Segment ASP2 would transition to an aboveground power line and would be constructed~~ to ~~follow~~ the planned extension of Temescal Canyon Road, as proposed in Specific Plan No. 353, where it would transition to an aboveground single-circuit power line to the Alberhill Substation site. In addition to ASP2, four new approximately 1.3-mile 115-kV subtransmission lines (one double-circuit and two single-circuit power lines) would extend above ground near the planned extension

Project	Section	Page	DEIR Language	SCE Recommended Language
				of Temescal Canyon Road to the Alberhill Substation site. New fiber optic cable would be installed along one of the four 115-kV power lines from the planned extension of Temescal Canyon Road to the Alberhill Substation site. ~~No~~ Approximately 2 miles of new access roads would be required for the 115-kV lines under ASP Alternative DD. Up to 10 115-kV subtransmission lines may ultimately extend from the substation, as needed. Two additional staging areas would be located near the alternative substation site; one would be located on the west side of Temescal Canyon Road, approximately 800 feet north of Dawson Canyon Road and one would be located on the southwest side of Mayhew Road and Orange Grove Place. A water line would be extended from Temescal Canyon Road to the Alberhill Substation site. Prior to construction, SCE would select a nearby 12 kV distribution circuit to serve as the temporary power source during construction activities at the Alberhill Substation site. The wood poles installed for temporary power would be approximately 40-50 feet tall. It is estimated that 30 wood poles would extend from a nearby 12 kV distribution circuit to the substation construction site. Temporary power would be in place for the duration of construction at the substation site. This alternative would require approximately 1,700-1,870 feet of duct bank, 5-6 vaults, 3-4 TSP risers, 63-70 LWS poles, 57-63 TSPs, 4 wood pole removals, 8 LSTs, and 2 LST removals."
Alberhill	5.3.2	5-28	Line 44 under heading Aesthetics states: "One crossing of I-15 near the proposed Alberhill Project's substation site would be eliminated."	The existing crossing of I-15 near the proposed Alberhill Substation site would remain. Alternative DD eliminates the need to double-circuit the existing crossing. SCE suggests deleting this sentence . ~~One crossing of I-15 near the proposed Alberhill Project's substation site would be eliminated.~~

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill	5.3.2	5-28	Line 47 under heading Aesthetics states: "Some of the extended 115-kV subtransmission line of ASP Alternative DD would be visible from I-15, but it would be far enough away from I-15 and would not encroach into the sky, so unlike the proposed project it would not dominate views from I-15.Therefore, ASP Alternative DD would result in substantially fewer aesthetic impacts on I-15 that those associated with the proposed project."	Similar to the proposed Alberhill Substation site, five subtransmission lines on four power lines would extend from Temescal Canyon Road to the ASP Alternative DD Alberhill Substation site. As shown in Attachment E, the 115-kV component of ASP Alternative DD would be visible from I-15. SCE suggests the following edits: "~~Some of t~~ The extended 115-kV subtransmission line of ASP Alternative DD would be visible from I-15, ~~but it would be far enough away from I-15~~ and would ~~not~~ encroach into the sky, ~~so unlike the proposed project it would not~~ dominating ~~e~~ views from I-15. Additionally, taller poles (minimum 10 feet) would be required to accommodate a double-circuit along Segments VIG6 and VIG7. Therefore, ASP Alternative DD would result in ~~substantially fewer~~ greater aesthetic impacts on I-15 ~~that those associated with~~ when compared to the proposed project."
Alberhill Alternative DD	5.3.2	5-29	Footnote 8 for language under Air Quality on Line 32 states: "[8] This number assumes approximately 346 acres of disturbance (substation: 42.9 acres, 500-kV transmission line: 9 acres, and 115-kV: 294 acres)."	SCE estimates that an approximately 2-mile access road would be required for the 115-kV subtransmission line extension. Additionally, SCE estimates 8 transmission towers would be required to extend the 500-kV Transmission lines to Serrano-Valley 500-kV Transmission Line. Therefore, SCE suggests the following edits: "[8] This number assumes approximately ~~346~~ 380 acres of disturbance (substation: ~~42.9~~ 45 acres, 500-kV transmission line: ~~9~~ 20 acres, and 115-kV: ~~294~~ 315 acres)."
Alberhill	5.3.2	5-29	Line 22 under the heading ASP Alternative DD – Serrano Commerce Center Substation Site and the discussion of Air Quality states: "As the same general construction activities would occur under ASP Alternative DD and the propose project, ASP Alternative DD would have the same level of intensity of daily construction activities as the proposed project. Thus, daily emissions impacts under ASP Alternative DD would be the same as the proposed project. Daily pollutant emissions would still be significant, given	Per SCE's edits to Footnote 8, the land disturbance associated with ASP Alternative DD would be 2.7 acres more than the Proposed Project. Due to the additional construction activities associated with the 115-kV subtransmission line construction and additional work at the Santiago Peak Communications site, air quality impacts would be greater. Therefore, SCE suggests editing this section as follows: "As the same general construction activities would occur under ASP Alternative DD; however, ~~and the proposed project,~~ ASP

Project	Section	Page	DEIR Language	SCE Recommended Language
			that the significance threshold is a daily emissions threshold, and the intensity of construction would stay the same under this alternative. ASP Alternative DD would have significant impacts on air quality from NOX, PM10, and PM2.5 emissions. Similar to the proposed Alberhill Project, NOX and PM2.5 emissions would be less than significant with the implementation of mitigation similar to that developed for the proposed Alberhill Project. Additionally, impacts from PM10 emissions would remain significant and unavoidable under ASP Alternative DD, similar to the proposed Alberhill Project. Under ASP Alternative DD, ground disturbance would be about 8 percent[8] less than for the proposed Alberhill Project. Helicopter use would be substantially reduced under this alternative, since the 500-kV transmission line would be much shorter than the proposed project's 500-kV transmission line and would be more accessible to vehicles. If a communications tower is constructed at Johnstone Peak Communication Site under ASP Alternative DD, emissions would be greater than emissions associated with the communications work at the Santiago Peak Communications site for the proposed project because ground disturbance would be required in order to construct the communications tower. Therefore, the total criteria pollutant and fugitive dust emissions over the whole construction period of ASP Alternative DD would be substantially decreased when compared to the proposed project."	Alternative DD would have a greater ~~the same~~ level of intensity of daily construction activities compared to ~~as~~ the proposed project. Thus, daily emissions impacts under ASP Alternative DD would be the greater ~~same as~~ than the proposed project. Daily pollutant emissions would still be significant, given that the significance threshold is a daily emissions threshold, and the intensity of construction would ~~stay the same~~ be slightly greater under this alternative. ASP Alternative DD would have significant impacts on air quality from NOX, PM10, and PM2.5 emissions. Similar to the proposed Alberhill Project, NOX and PM2.5 emissions would be less than significant with the implementation of mitigation similar to that developed for the proposed Alberhill Project. Additionally, impacts from PM10 emissions would remain significant and unavoidable under ASP Alternative DD, similar to the proposed Alberhill Project. Under ASP Alternative DD, ground disturbance would be ~~about 8 percent~~ similar[8] ~~less than for~~ to the proposed Alberhill Project. Helicopter use would be slightly ~~substantially~~ reduced under this alternative, since the 500-kV transmission line would be ~~much~~ shorter than the proposed project's 500-kV transmission line and would be more accessible to vehicles. If a communications tower is constructed at Johnstone Peak Communication Site under ASP Alternative DD, emissions would be greater than emissions associated with the communications work at the Santiago Peak Communications site for the proposed project because ground disturbance would be required in order to construct the communications tower. Therefore, the total criteria pollutant and fugitive dust emissions over the whole construction period of ASP Alternative DD would be greater ~~substantially decreased~~ when compared to the proposed project."
Alberhill	5.3.2	5-29	Line 44 under heading Biological Resources states: "Construction of ASP Alternative DD would result in substantially fewer impacts on biological resources than the proposed Alberhill Project. The 500-kV transmission lines associated with ASP Alternative DD would avoid work in and near the MSHCP Core Reserve. They would also be shorter and	Please clarify impacts to SKR Core Reserve and MSHCP ARL as follows: "Construction of ASP Alternative DD would result in ~~substantially fewer~~ similar impacts on biological resources than the proposed Alberhill Project. The Proposed Alberhill Project would not directly impact SKR Core Reserve. Similarly,t~~T~~he500-

Project	Section	Page	DEIR Language	SCE Recommended Language
			would not require as many access roads, resulting in substantially less disturbance of natural vegetation and potential special-status and common species habitat."	kV transmission lines associated with ASP Alternative DD would ~~avoid work in and near~~ not impact the ~~MSHCP~~SKR Core Reserve. Both the Proposed Alberhill Project and ASP Alternative DD would impact MSHCP ARL. These impacts would be substantially greater under ASP Alternative DD because they impact riparian/riverine areas already committed for conservation under the MSHCP (per JPR No. 05-08-31-01.However, the 500 kV transmission lines associated with ASP Alternative DD ~~They~~ would ~~also~~ be shorter and would not require as many access roads, resulting in substantially less disturbance of natural vegetation and potential special-status and common species habitat."
Alberhill	5.3.2	5-30	Line 21 under heading Biological Resources states: "ASP Alternative DD may result in greater impacts to jurisdictional waters and riparian habitat due to more components, including the substation itself, the 500-kV transmission lines, and the extended portion of the 115-kV subtransmission line being built near Temescal Wash. The 500-kV transmission lines would cross Temescal Wash, and the extended 115-kV subtransmission lines would cross a tributary to the wash. Furthermore, bank protection may be needed along the eastern substation boundary to stabilize the bank of Temescal Wash, depending on how close the substation pad is located to the wash, which may cause greater impacts to riparian habitat than the proposed project. It is possible the substation could be set back from the wash far enough to avoid impacts to the wash. Impacts such as the potential for sedimentation would be temporary and occur during construction, while there would be some permanent impacts to waters should bank protection be needed. These impacts would be subject to federal and state permit conditions to reduce impacts to waters, wildlife, and plants. Overall, impacts to biological resources under ASP Alternative DD would be substantially reduced when compared to the proposed Alberhill Project, though potentially significant. Mitigation measures developed for the proposed project would	Slight benefits for biological resources should not be given considerable weight given that impacts on biological resources will be reduced and/or mitigated consistent with the MSHCP. The proposed project and Alternative DD would both result in impacts on biological resources that are less than significant with mitigation. Although the acreage of impact under Alternative DD is less, this analysis does not take into account the quality, functions and values of the biological resources potentially impacted. For example, The RCA has placed a high priority on preserving and protecting the functions and values along Temescal Wash, which could be substantially, directly and permanently impacted by ASP Alternative DD. Impacts to jurisdictional waters (riparian/riverine areas) are less severe under the proposed project. Therefore, SCE suggests the following edits: "ASP Alternative DD may result in greater impacts to jurisdictional waters and riparian habitat due to more components, including the substation itself, the 500-kV transmission lines, and the extended portion of the 115-kV subtransmission line being built near Temescal Wash. The 500-kV transmission lines would cross Temescal Wash, and the extended 115-kV subtransmission lines would cross a tributary to the wash. Access roads for the extended 115-kV subtransmission lines have not been designed; an existing bridge may need to be

Project	Section	Page	DEIR Language	SCE Recommended Language
			reduce the impacts of ASP Alternative DD to less than significant."	upgraded or a new bridge may be required to cross the Temescal Wash tributary adjacent to Temescal Canyon Road. Furthermore, bank protection may be needed along the eastern substation boundary to stabilize the bank of Temescal Wash, depending on how close the substation pad is located to the wash, which may cause greater impacts to riparian habitat than the proposed project. It is possible the substation could be set back from the wash far enough to avoid impacts to the wash. Impacts such as the potential for sedimentation would be temporary and occur during construction, while there would be some permanent impacts to waters should bank protection be needed. These impacts would be subject to federal and state permit conditions to reduce impacts to waters, wildlife, and plants. Overall, impacts to biological resources under ASP Alternative DD would be similar ~~substantially reduced~~ when compared to the proposed Alberhill Project, though potentially significant. Mitigation measures developed for the proposed project would reduce the impacts of ASP Alternative DD to less than significant."
Alberhill	5.3.4	5-30	Line 37 under heading Cultural Resources states: "Some areas where ASP Alternative DD would be located have previously been surveyed for cultural resources, with only one cultural resource present along the 115-kV line alignment (SCE 2011). This cultural resource would likely be avoidable through pole siting; therefore, this alternative is expected to have the same impact as the proposed project on known cultural resources. Overall, there would be about 8 percent less land disturbed than the proposed project, but much of this reduced disturbance may not involve extensive cut and fill. ASP Alternative DD would disturb about the same amount of land at the alternative substation site as at the proposed project site, and extensive cut and fill may also be required at ASP Alternative DD's substation site. Therefore, the potential for uncovering undiscovered resources at the substation site is about the same as the proposed project. The area impacted under ASP Alternative DD is of similar tribal sensitivity as other portions of the proposed project. Impacts under Alternative DD would be only slightly reduced as	Per SCE's edits to Footnote 8, the land disturbance associated with ASP Alternative DD would be 2.7 acres more than the Proposed Project. Since the land disturbance would be similar, impacts to cultural resources would be similar. Therefore, SCE suggests editing this section as follows: "Some areas where ASP Alternative DD would be located have previously been surveyed for cultural resources, with only one cultural resource present along the 115-kV line alignment (SCE 2011). This cultural resource would likely be avoidable through pole siting; therefore, this alternative is expected to have the same impact as the proposed project on known cultural resources. ~~Overall, there would be about 8 percent less land disturbed than the proposed project, but much of this reduced disturbance may not involve extensive cut and fill.~~ ASP Alternative DD would disturb about the same amount of land at the alternative substation site as at the proposed project site, and extensive cut and fill may also be required at ASP Alternative DD's substation site. Therefore, the potential for uncovering undiscovered

Project	Section	Page	DEIR Language	SCE Recommended Language
			compared to the proposed project and would still be significant. Impacts could be reduced to less than significant with the implementation of mitigation measures developed for the proposed Alberhill Project."	resources at the substation site is about the same as the proposed project. The area impacted under ASP Alternative DD is of similar tribal sensitivity as other portions of the proposed project. Impacts under Alternative DD would be similar ~~only slightly reduced~~ as compared to the proposed project and would still be significant. Impacts could be reduced to less than significant with the implementation of mitigation measures developed for the proposed Alberhill Project."
Alberhill	5.3.4	5-31	Line 2 under heading Geology, Soils, and Mineral Resources states: "ASP Alternative DD would result in 8 percent less ground disturbance than the proposed project. The reduction in ground disturbance would result from the reconfiguration of the 500-kV transmission line. Given that ground disturbance along the proposed 500-kV transmission line is relatively dispersed among the line and access roads, ASP Alternative DD would result in only a slightly reduced potential for erosion and topsoil loss. The 500-kV transmission lines would be located on land with a much less steep grade than under the proposed project, reducing potential risk of landslide damaging project infrastructure. Impacts overall would be slightly reduced for this resource as compared to the proposed project, but still potentially significant under ASP Alternative DD. The significant impacts could be reduced to less than significant with the mitigation measures developed for the proposed project."	Per SCE's edits to Footnote 8, the land disturbance associated with ASP Alternative DD would be 2.7 acres more than the Proposed Project. Since the land disturbance would be similar, impacts to geology, soils, and mineral resources would be similar. Therefore, SCE suggests editing this section as follows: "ASP Alternative DD would result in ~~8 percent less~~ similar ground disturbance ~~than~~ to the proposed project. ~~The reduction in ground disturbance would result from the reconfiguration of the 500-kV transmission line.~~ Given that ground disturbance along the proposed 500-kV transmission line is relatively dispersed among the line and access roads, ASP Alternative DD would result in ~~only a slightly reduced~~ a similar potential for erosion and topsoil loss. The 500-kV transmission lines would be located on land with a much less steep grade than under the proposed project, reducing potential risk of landslide damaging project infrastructure. Impacts overall would be slightly reduced for this resource as compared to the proposed project, but still potentially significant under ASP Alternative DD. The significant impacts could be reduced to less than significant with the mitigation measures developed for the proposed project."
Alberhill	5.3.4	5-31	Line 13 under heading Greenhouse Gas Emissions states: "ASP Alternative DD would result in about 8 percent less ground disturbance than the proposed Alberhill Project. Greenhouse gas emissions during construction of ASP Alternative DD would be lower than those associated with the proposed project due to the reduction in disturbance area, which involves less equipment use,	Per SCE's edits to Footnote 8, the land disturbance associated with ASP Alternative DD would be 2.7 acres more than the Proposed Project. Due to the additional construction activities associated with the 115-kV subtransmission line construction and additional work at the Santiago Peak Communications site, greenhouse Gas emissions would be greater. Therefore, SCE suggests editing this section to as follows:

Project	Section	Page	DEIR Language	SCE Recommended Language
			as well as less helicopter use for 500-kV transmission line construction. Impacts under this alternative would be less than significant."	"ASP Alternative DD would result in ~~about 8 percent less~~ similar ground disturbance ~~than~~ to the proposed Alberhill Project. Although helicopter use for 500-kV transmission line would be slightly lower, ~~G~~greenhouse gas emissions during construction of ASP Alternative DD would be greater ~~lower~~ than those associated with the proposed project due to the additional construction activities associated with the 115-kV subtransmission line construction and additional work at the Santiago Peak Communications site ~~reduction in disturbance area, which involves less equipment use, as well as less helicopter use for 500-kV transmission line construction.~~ Impacts under this alternative would be less than significant."
Alberhill	5.3.4	5-31	Line 20 under heading Hazards and Hazardous Materials states: "ASP Alternative DD would result in less overall risk of hazards than the proposed project. Under this alternative, ground disturbance would be about 8 percent less than the proposed project, which means that: slightly fewer hazardous materials overall would be used, transported, and disposed of; there would be a slightly lower chance of an accident; and there would be slightly less potential for encountering contaminated soils. Consequences of a hazardous materials spill at ASP Alternative DD's substation site would likely be greater than at the proposed project's substation site given the close proximity of Temescal Wash. Impacts during operation and maintenance of the proposed Alberhill Project would be about the same, since the substation under this alternative would involve the same construction as the proposed project's substation. Impacts from hazardous materials under ASP Alternative DD would be lower than for the proposed project but still potentially significant. Impacts from hazardous materials under ASP Alternative DD would be reduced to less than significant with mitigation measures similar to those developed for the proposed Alberhill Project."	Per SCE's edits to Footnote 8, the land disturbance associated with ASP Alternative DD would be 2.7 acres more than the Proposed Project. Since the land disturbance would be similar, impacts from hazardous materials would be similar. Therefore, SCE suggests editing this section as follows: "ASP Alternative DD would result in less overall risk of hazards than the proposed project. Under this alternative, ground disturbance would be similar to ~~about 8 percent less than~~ the proposed project, which means that: similar ~~slightly fewer~~ hazardous materials overall would be used, transported, and disposed of; there would be a ~~slightly lower~~ similar chance of an accident; and there would be ~~slightly less~~ similar potential for encountering contaminated soils. Consequences of a hazardous materials spill at ASP Alternative DD's substation site would likely be greater than at the proposed project's substation site given the close proximity of Temescal Wash. Impacts during operation and maintenance of the proposed Alberhill Project would be about the same, since the substation under this alternative would involve the same construction as the proposed project's substation. Impacts from hazardous materials under ASP Alternative DD would be ~~lower than for~~ similar to the proposed project but still potentially significant. Impacts from hazardous materials under ASP Alternative DD would be

Project	Section	Page	DEIR Language	SCE Recommended Language
				reduced to less than significant with mitigation measures similar to those developed for the proposed Alberhill Project."
Alberhill	5.3.4	5-31	Line 34 under heading Hydrology and Water Quality states: "ASP Alternative DD would result in 8 percent less ground disturbance than the proposed project. ASP Alternative DD would therefore result in a reduced potential for sedimentation. The lower use of hazardous materials under ASP Alternative DD would result in lower potential for water contamination than the proposed project. Similar to the proposed Alberhill Project, ASP Alternative DD would be constructed near Temescal Wash and tributaries of Temescal Wash. ASP Alternative DD has the potential for greater impacts to Temescal Wash than the proposed project because it would involve siting of more components near Temescal Wash, including the substation itself, the 500-kV transmission lines, and the extended portion of the 115-kV subtransmission line. The 500-kV transmission lines would cross Temescal Wash, and the extended 115-kV subtransmission lines would cross a tributary to the wash. Furthermore, bank protection may be needed along the eastern substation boundary to stabilize the bank of Temescal Wash, which may cause greater impacts to water quality during construction. The ASP Alternative DD substation site is not as level as the proposed project's substation site, meaning that additional grading would be needed. This would result in slightly more drainage and runoff impacts than the proposed project. Overall impacts to hydrology and water quality would be reduced under Alternative DD as compared to the proposed project due to the lower ground disturbance; however, impacts would remain potentially significant. Impacts to hydrology and water quality under ASP Alternative DD would be reduced to less than significant with the implementation of mitigation measures similar to those developed for the proposed Alberhill Project."	Per SCE's edits to Footnote 8, the land disturbance associated with ASP Alternative DD would be 2.7 acres more than the Proposed Project. Since the land disturbance would be similar, impacts to hydrology and water quality would be similar. Therefore, SCE suggests editing this section As follows: "ASP Alternative DD would result in ~~8 percent less~~ ground disturbance similar to ~~than~~ the proposed project. ASP Alternative DD would therefore result in a ~~reduced~~ similar potential for sedimentation. The ~~lower~~ similar use of hazardous materials under ASP Alternative DD would result in ~~lower~~ similar potential for water contamination ~~than~~ to the proposed project. Similar to the proposed Alberhill Project, ASP Alternative DD would be constructed near Temescal Wash and tributaries of Temescal Wash. ASP Alternative DD has the potential for greater impacts to Temescal Wash than the proposed project because it would involve siting of more components near Temescal Wash, including the substation itself, the 500-kV transmission lines, and the extended portion of the 115-kV subtransmission line. The 500-kV transmission lines would cross Temescal Wash, and the extended 115-kV subtransmission lines would cross a tributary to the wash. Furthermore, bank protection may be needed along the eastern substation boundary to stabilize the bank of Temescal Wash, which may cause greater impacts to water quality during construction. The ASP Alternative DD substation site is not as level as the proposed project's substation site, meaning that additional grading would be needed. This would result in slightly more drainage and runoff impacts than the proposed project. Overall impacts to hydrology and water quality would be ~~reduced~~ greater under Alternative DD as compared to the proposed project ~~due to the lower ground disturbance~~; however, impacts would remain potentially significant. Impacts to hydrology and water quality under ASP Alternative DD would be reduced to less than significant with the implementation of mitigation

Project	Section	Page	DEIR Language	SCE Recommended Language
				measures similar to those developed for the proposed Alberhill Project."
Alberhill	5.3.4	5-33	Line 15 under heading Other Resource Areas states: "Public Services and Utilities: The shorter construction timeframe under ASP Alternative DD would result in slightly less potential need for police and fire services than the proposed Alberhill Project. Water use for dust control could be about 8 percent lower under ASP Alternative DD than for the proposed Alberhill Project due to the smaller disturbance area associated with the alternative. Overall, impacts would be reduced when compared to the proposed project."	Per SCE's edits to Footnote 8, the land disturbance associated with ASP Alternative DD would be 2.7 acres more than the Proposed Project. Although land disturbance would be similar, water usage is expected to be greater under ASP Alternative DD. Therefore, SCE suggests editing this section as follows: "Public Services and Utilities: The significant amount of grading associated with Alternative DD's substation site and the additional 2 miles of access roads required for the 115-kV subtransmission lines would require substantially more water. Impacts to public services and utilities would be the greater under ASP Alternative DD as compared to the proposed project. ~~The shorter construction timeframe under ASP Alternative DD would result in slightly less potential need for police and fire services than the proposed Alberhill Project. Water use for dust control could be about 8 percent lower under ASP Alternative DD than for the proposed Alberhill Project due to the smaller disturbance area associated with the alternative. Overall, impacts would be reduced when compared to the proposed project.~~"
Alberhill	5.3.4	5-34	Line 39 under heading Environmentally Superior Alternative states: "ASP Alternative DD would involve no work in or near the MSHCP Core Reserve and would involve slightly less work and disturbance in Stephens' kangaroo rat habitat than ASP Alternative B."	SCE suggests the following edits: "ASP Alternative DD would involve no work in or near the ~~MSHCP~~ SKR Core Reserve and would involve slightly less work and disturbance in Stephens' kangaroo rat habitat than ASP Alternative B."
Valley-Ivyglen	6.3.1.3	6-8	Line 48 under heading Cumulative Impacts states: "There would be no nighttime lighting associated with the proposed Valley–Ivyglen Project. This project would not contribute to a cumulative impact related to nighttime lighting."	Since construction lighting was discussed earlier in this section, it appears this statement is meant to be about operations. SCE suggests the following edits: "There would be no nighttime lighting associated with operation of the proposed Valley–Ivyglen Project. This project would not contribute to a cumulative impact related to nighttime lighting."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Valley-Ivyglen	6.3.3.3	6-12	Line 34 under heading Valley Ivy-Glen Project: "Nonattainment status is a significant cumulative air quality impact. As discussed in Section 4.3, "Air Quality," Impact AQ-3 (VIG), the proposed Valley–Ivyglen Project would make a cumulatively considerable contribution to PM10 and PM2.5 emissions that cause non-attainment."	Please revise language to clarify as follows: "Nonattainment status is a significant cumulative air quality impact. As discussed in Section 4.3, "Air Quality," Impact AQ-3 (VIG), the proposed Valley–Ivyglen Project would make a cumulatively considerable contribution to PM10 and PM2.5 emissions that ~~cause~~ are currently in non-attainment."
Valley-Ivyglen	6.3.5.3	6-16	Line 3 under heading Cumulative Impacts states: "…procedures to ensure that any impacts to eligible historic resources or unique archaeological resources are…"	SCE suggests the following edits: "…procedures to ensure that any impacts to eligible ~~historic~~ historical resources or unique archaeological resources are…"
Valley-Ivyglen	6.3.5.3	6-16	Line 9 under heading Cumulative Impacts states: "MM CR-2 requires outlining monitoring procedures for ground disturbing activities in areas with moderate and high archaeological sensitivity.MM CR-3 outlines procedures for construction when a resource is discovered."	To be consistent with SCE's proposed edits to MM CR-2 and CR-3, SCE suggests the following edits: "MM CR-2 requires outlining monitoring procedures for all new ground disturbing activities ~~in areas with moderate and high archaeological sensitivity~~ within Alberhill Substation, new access road construction and near prehistoric ESAs.~~MM CR-3 outlines procedures for construction when a resource is discovered.~~"
Alberhill	6.3.5.4	6-17	Line 30 under heading Cumulative Impacts states: "MM CR-3 outlines procedures for construction when a resource is discovered."	SCE suggests the following edits: ~~MM CR-3 outlines procedures for construction when a resource is discovered.~~
Valley-Ivyglen	6.3.12.3	6-34	Line 42 under heading Cumulative Impacts states: "The proposed Valley-Ivyglen Project is expected to be constructed over 27 months and would use up to 125 personnel."	Per SCE project description edits submitted in September 2015, SCE suggests the following edits: "The proposed Valley-Ivyglen Project is expected to be constructed over 28 ~~27~~ months and would use up to 125 personnel."
Valley-Ivyglen	6.3.15.4	6-41	Line 30 under heading Valley-Ivyglen Project states: "Construction of the proposed project would generate approximately 31,873 tons of waste over 27 months, 31 or an	Per SCE project description edits submitted in September 2015, SCE suggests the following edits: "Construction of the proposed project would generate approximately 31,873 tons of waste over 28 ~~27~~ months, 31 or an

Project	Section	Page	DEIR Language	SCE Recommended Language
			average of 14,165 tons per year, that would be disposed of in either the El Sobrante or Badlands 32 landfill."	average of 14,165 tons per year, that would be disposed of in either the El Sobrante or Badlands 32 landfill."
Valley-Ivyglen	6.3.15.4	6-41	Line 36 under heading Valley-Ivyglen Project states: "The 23 anticipates a surplus of approximately 3,262,424,500 gallons of water during a Multiple Dry-Year…"	SCE suggests the following edit: "The~~23~~EVMWD anticipates a surplus of approximately 3,262,424,500 gallons of water during a Multiple Dry-Year…"
Valley-Ivyglen	7.2.1.3	7-4	Line 4 under heading Irreversible Damages from Project-related Environmental Accidents states: "…reduced to less than significant with Mitigation Measure (MM) HZ-1, MM HZ-2, MM HZ-3, MM HZ-4, MM WQ-3, and MM BR-14."	SCE suggests the following edits: "…reduced to less than significant with implementation of the SWPPP and Mitigation Measure (MM) ~~HZ-1~~, MM HZ-2, ~~MM HZ-3,~~ MM HZ-4, and MM WQ-3~~, and MM BR-14~~."
Alberhill	7.2.1.3	7-4	Line 50 under heading Irreversible Damages from Project-related Accidents states: "However, impacts would be reduced to less than significant with MM HZ-1, MM HZ-2, MM HZ-3, MM HZ-4, MM WQ-3, and MM BR-14."	SCE suggests the following edits: "However, impacts would be reduced to less than significant with implementation of the SWPPPP, ~~MM HZ-1,~~ MM HZ-2~~, MM HZ-3~~, MM HZ-4, and MM WQ-3~~, and MM BR-14~~."
Alberhill/ Valley-Ivyglen	9.6	9-6	Line 41 under heading Mitigation, Monitoring, Compliance and Reporting Program states: "Table 4-1 presents the MMCRP, which incorporates all changes to the proposed project and mitigation measures that were made as a result of public review of the Draft EIR and Recirculated Draft EIR and further consideration of the proposed project by the CPUC."	SCE suggests the following edits: "Table ~~4-1~~ 9-1 presents the MMCRP, which incorporates all changes to the proposed project and mitigation measures that were made as a result of public review of the Draft EIR and Recirculated Draft EIR and further consideration of the proposed project by the CPUC."
Alberhill/ Valley-Ivyglen	9.6	9-7	Line 4 under heading Mitigation, Monitoring, Compliance and Reporting Program states: "Table 4-1 is the core document for the proposed project's environmental requirements and will serve as the primary guideline for determining compliance with the MMCRP."	SCE suggests the following edits: "Table ~~4-1~~ 9-1 is the core document for the proposed project's environmental requirements and will serve as the primary guideline for determining compliance with the MMCRP."

Alberhill System Project & Valley-Ivyglen Subtransmission Line Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Project	Section	Page	DEIR Language	SCE Recommended Language
Alberhill/ Valley-Ivyglen	9.6	9-9	Table 9-1	SCE suggests the following edits per Attachment F.

ATTACHMENT A

Table ES-1 Summary of Environmental Impacts and Mitigation Measures for the Proposed Projects

Resource	Valley–Ivyglen 115-kV Subtransmission Project	Alberhill System Project
Aesthetics	***Less than Significant with Mitigation*** MM AES-1: Staging Area Screening MM AES-2: Segment VIG2 Wood Poles ~~Undergrounding~~ MM AES-3: Glare Reduction MM AES-4: Lake Street Pole Placement and Landscaping MM AES-5: Night Lighting during Construction	***Significant*** MM AES-1: Staging Area Screening MM AES-3: Glare Reduction ~~MM AES-6: Hillside and Natural Slope Preservation~~ MM AES-7: Alberhill Substation Visual Treatments ~~MM AES-8: Treatment of 500-kV Transmission Towers~~ MM AES-9: Use wood or galvanized ~~self-weathering~~ steel poles
Agriculture and Forestry Resources	***Less than Significant***	***Less than Significant***
Air Quality	***Significant*** MM AQ-1: Minimize NO_X and PM emissions from off-road diesel powered construction equipment MM AQ-2: Oxides of Nitrogen (NO_X) Credits. ~~MM AQ-3: Additional Fugitive Dust Controls~~ MM AQ-4: Odor Reduction at Staging Yard VIG13	***Significant*** MM AQ-1: Minimize NO_X and PM emissions from off-road diesel powered construction equipment MM AQ-2: Oxides of Nitrogen (NO_X) Credits. ~~MM AQ-3: Additional Fugitive Dust Controls~~ MM AQ-5: Volatile Organic Compounds Credits
Biological Resources	***Less than Significant with Mitigation*** MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. MM BR-2: Preconstruction Surveys. MM BR-3: Biological Monitoring During Construction. MM BR-4: Limit Removal of Native Vegetation Communities and Trees. MM BR-5: California gnatcatcher protection measures. MM BR-6: Oak tree protection measures. MM BR-7: Habitat Restoration and Revegetation Plan Requirements. ~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures.~~ MM BR-9: Invasive Plant Control Measures. MM BR-10: Prevent Wildlife Entrapment. MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. MM BR-12: Burrowing Owl Impact Reduction Measures.	***Less than Significant with Mitigation*** MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. MM BR-2: Preconstruction Surveys. MM BR-3: Biological Monitoring During Construction. MM BR-4: Limit Removal of Native Vegetation Communities and Trees. MM BR-5: California gnatcatcher protection measures. MM BR-6: Oak tree protection measures. MM BR-7: Habitat Restoration and Revegetation Plan Requirements. ~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures~~. MM BR-9: Invasive Plant Control Measures. MM BR-10: Prevent Wildlife Entrapment. MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. MM BR-12: Burrowing Owl Impact Reduction Measures.

Table ES-1 Summary of Environmental Impacts and Mitigation Measures for the Proposed Projects

Resource	Valley–Ivyglen 115-kV Subtransmission Project	Alberhill System Project
	MM BR-13: Trash Abatement. MM BR-14: Protection of Special Status Species without the MSHCP on Castle and Cooke Land. ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~	MM BR-13: Trash Abatement. MM BR-14: Protection of Special Status Species without the MSHCP on Castle and Cooke Land. ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~ MM BR-16: Stephens' Kangaroo Rat Take Avoidance within Core Reserve.
Cultural Resources	***Less than Significant with Mitigation*** MM CR-1a: Ensure preconstruction survey coverage of all work areas and staging areas. MM CR-1b: Avoid impacts to known and undiscovered historic resources and unique archaeological resources (except for site P33-000714). MM CR-2: Monitor ground disturbing activities (includes Native American monitoring). ~~MM CR-3: Follow historic resource and unique archaeological resource discovery protocol.~~ MM CR-4: Monitor Paleontologically Sensitive Areas. MM CR-5: Follow Paleontological Resource Discovery Protocol. MM CR-6: Avoid impacts to contributing elements of P33-000714. MM CR-7: Follow Necessary Procedures for Unanticipated Discovery of Human Remains.	***Less than Significant with Mitigation*** MM CR-1a: Ensure preconstruction survey coverage of all work areas and staging areas. MM CR-1b: Avoid impacts to known and undiscovered historic resources and unique archaeological resources (except for site P33-000714). MM CR-2: Monitor ground disturbing activities (includes Native American monitoring). ~~MM CR-3: Follow historic resource and unique archaeological resource discovery protocol.~~ MM CR-4: Monitor Paleontologically Sensitive Areas. MM CR-5: Follow Paleontological Resource Discovery Protocol. MM CR-7: Follow Necessary Procedures for Unanticipated Discovery of Human Remains.
Geology, Soils, and Mineral Resources	***Less than Significant with Mitigation*** ~~MM GE-1: Seismic Safety Training~~	***Less than Significant with Mitigation*** ~~MM GE-1: Seismic Safety Training~~
Greenhouse Gases	***Less than Significant***	***Less than Significant***
Hazards and Hazardous Materials	***Less than Significant with Mitigation*** ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~ MM WQ-1: Blasting Plan and Best Management Practices. ~~MM HZ-1: Hazardous Materials Management.~~ MM HZ-2: Contaminated Soil/Groundwater Contingency Plan. ~~MM HZ-3: DigAlert.~~ MM HZ-4: Fire Control and Emergency Response.	***Less than Significant with Mitigation*** ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~ ~~MM HZ-1: Hazardous Materials Management.~~ MM HZ-2: Contaminated Soil/Groundwater Contingency Plan. ~~MM HZ-3: DigAlert.~~ MM HZ-4: Fire Control and Emergency Response.

Table ES-1 Summary of Environmental Impacts and Mitigation Measures for the Proposed Projects

Resource	Valley–Ivyglen 115-kV Subtransmission Project	Alberhill System Project
Hydrology and Water Quality	***Less than Significant with Mitigation*** ~~MM HZ-1: Hazardous Materials Management.~~ MM BR-7: Habitat Restoration and Revegetation Plan Requirements. ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~ MM WQ-1: Blasting Plan and Best Management Practices. ~~MM WQ-2: Drainage crossing procedures and practices.~~ MM WQ-3: Design of access roads with erosion control measures. MM WQ-4: Disposal of groundwater from dewatering excavations. MM WQ-5: Maintain capacity and connectivity of drainages. MM WQ-6: Avoid impeding MDP implementation and function. MM HZ-4: Fire Control and Emergency Response.	***Less than Significant with Mitigation*** ~~MM HZ-1: Hazardous Materials Management.~~ MM BR-7: Habitat Restoration and Revegetation Plan Requirements. ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~ MM WQ-1: Blasting Plan and Best Management Practices. ~~MM WQ-2: Drainage crossing procedures and practices.~~ MM WQ-3: Design of access roads with erosion control measures. MM WQ-4: Disposal of groundwater from dewatering excavations. MM WQ-5: Maintain capacity and connectivity of drainages. MM WQ-6: Avoid impeding MDP implementation and function. MM WQ-7: Design detention basin to adequate size. MM HZ-4: Fire Control and Emergency Response.
Land Use and Planning	***Less than Significant with Mitigation*** MM BR-6: Oak tree protection measures. MM BR-7: Habitat Restoration and Revegetation Plan Requirements. ~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures.~~ MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. MM BR-12: Burrowing Owl Impact Reduction Measures	***Less than Significant with Mitigation*** MM BR-2: Preconstruction Surveys. MM BR-3: Biological Monitoring During Construction. MM BR-6: Oak tree protection measures. MM BR-7: Habitat Restoration and Revegetation Plan Requirements. ~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures.~~ MM BR-9: Invasive Plant Control Measures. MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. MM BR-12: Burrowing Owl Impact Reduction Measures. MM BR-16: Stephens' Kangaroo Rat Take Avoidance within Core Reserve

Table ES-1 Summary of Environmental Impacts and Mitigation Measures for the Proposed Projects

Resource	Valley–Ivyglen 115-kV Subtransmission Project	Alberhill System Project
Noise and Vibration	***Significant*** MM NV-1: Construction and Maintenance Noise Reduction Measures. MM NV-2: Blasting Vibration Control Measures.	***Significant*** MM NV-1: Construction and Maintenance Noise Reduction Measures. ~~MM NV-3: Low-Noise Substation Equipment and Noise Barriers.~~ MM NV-4: Corona Noise Reduction Insulators.
Population and Housing	***Less than Significant***	***Less than Significant***
Public Services and Utilities	***Less than Significant with Mitigation*** ~~MM AE-6: Hillside and Natural Slope Preservation~~ MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~ MM HZ-4: Fire Control and Emergency Response	***Less than Significant with Mitigation*** ~~MM AE-6: Hillside and Natural Slope Preservation~~ MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. ~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~ MM HZ-4: Fire Control and Emergency Response
Recreation	***Less than Significant***	***Less than Significant***
Transportation	***Less than Significant with Mitigation*** ~~MM TT-1: Traffic Management and Control Plan~~ MM TT-2: Heavy Vehicle Traffic Restrictions. ~~MM TT-3: Highway Closure Plan.~~ MM TT-4: Helicopter Lift Plan. ~~MM TT-5. FAA No-Hazard Determination~~ MM TT-6: Road Damage Repair. MM TT-7: Emergency Service Provider Notification.	***Less than Significant with Mitigation*** ~~MM TT-1: Traffic Management and Control Plan~~ MM TT-2: Heavy Vehicle Traffic Restrictions. ~~MM TT-3: Highway Closure Plan.~~ MM TT-4: Helicopter Lift Plan. ~~MM TT-5. FAA No-Hazard Determination~~ MM TT-6: Road Damage Repair. MM TT-7: Emergency Service Provider Notification.
Cumulative	***Significant***	***Significant***

ATTACHMENT B

Table 1-2 Recorded and Projected Peak Demand in Megavolt Amperes for the Valley-Elsinore-Fogarty 115-kV Line (2008 to 2024)

Recorded and Projected Peak Demand (2008 to 2010)	**2008**	**2009**	**2010**
Planned Maximum Operating Limit	184	184	184
Recorded Peak Demand	146	149	168
Projected Peak Demand (1-in-5 ~~10~~ year heat storm) [a]	191	189	169
Planned Maximum Emergency Operating Limit (N-1 condition) [b]	248	248	248
Projected N-1 Loading	284	281	252
Recorded and Projected Peak Demand (2011 to 2013)	**2011**	**2012**	**2013**
Planned Maximum Operating Limit	184	184	184
Recorded Peak Demand	167	163	159
Projected Peak Demand (1-in-5 ~~10~~ year heat storm) [a]	180	191	173
Planned Maximum Emergency Operating Limit (N-1 condition) [b]	248	248	248
Projected N-1 Loading	268	284	258
Projected Peak Demand (2014 to 2016)	**2014**	**2015**	**2016**
Planned Maximum Operating Limit	184	184	184
Recorded Peak Demand	163	–	–
Projected Peak Demand (1-in-5 ~~10~~ year heat storm)	179	183	187[c]
Planned Maximum Emergency Operating Limit (N-1 condition) [b]	248	248	248
Projected N-1 Loading	266	275	292
Projected Peak Demand (2017 to 2019)	**2017**	**2018**	**2019**
Planned Maximum Operating Limit	184	184	184
Projected Peak Demand (1-in-5 ~~10~~ year heat storm)	191	196	201
Planned Maximum Emergency Operating Limit (N-1 condition) [b]	248	248	248
Projected N-1 Loading	294	297	305
Projected Peak Demand (2020 to 2022)	**2020**	**2021**	**2022**
Planned Maximum Operating Limit	184	184	184
Projected Peak Demand (1-in-5 ~~10~~ year heat storm)	203	205	206
Planned Maximum Emergency Operating Limit (N-1 condition) [b]	248	248	248
Projected N-1 Loading	307	309	312
Projected Peak Demand (2023 to 2024)	**2023**	**2024**	
Planned Maximum Operating Limit	184	184	
Projected Peak Demand (1-in-5 ~~10~~ year heat storm)	2008	209	
Planned Maximum Emergency Operating Limit (N-1 condition) [b]	248	248	
Projected N-1 Loading	313	315	

Sources: SCE 2014

Key: CPUC = California Public Utilities Commission, kV = kilovolt, SCE = Southern California Edison

Notes:

[a] The Projected Peak Demand and Projected N-1 Loading values prior to 2013 are the same as those provided in the original Valley-Ivyglen Final EIR (CPUC 2010). They were the applicant's projections for future years at the time they were produced. Projected peak demand values from 2015 through 2024 reflect the latest applicant forecasts submitted to the CPUC.

[b] For the purpose of documenting recorded and projected demand on the Valley-Elsinore-Fogarty 115-kV Line, an N-1 condition refers to the loss of a single subtransmission element (e.g., a subtransmission line or transformer). Demand on the Valley-Elsinore-Fogarty 115-kV Line would temporarily increase until the N-1 condition is corrected.

[c] Projected demand for a 1-in-5 ~~10~~ year heat storm exceeds the Valley-Elsinore-Fogarty 115-kV line's operating limit.

ATTACHMENT C

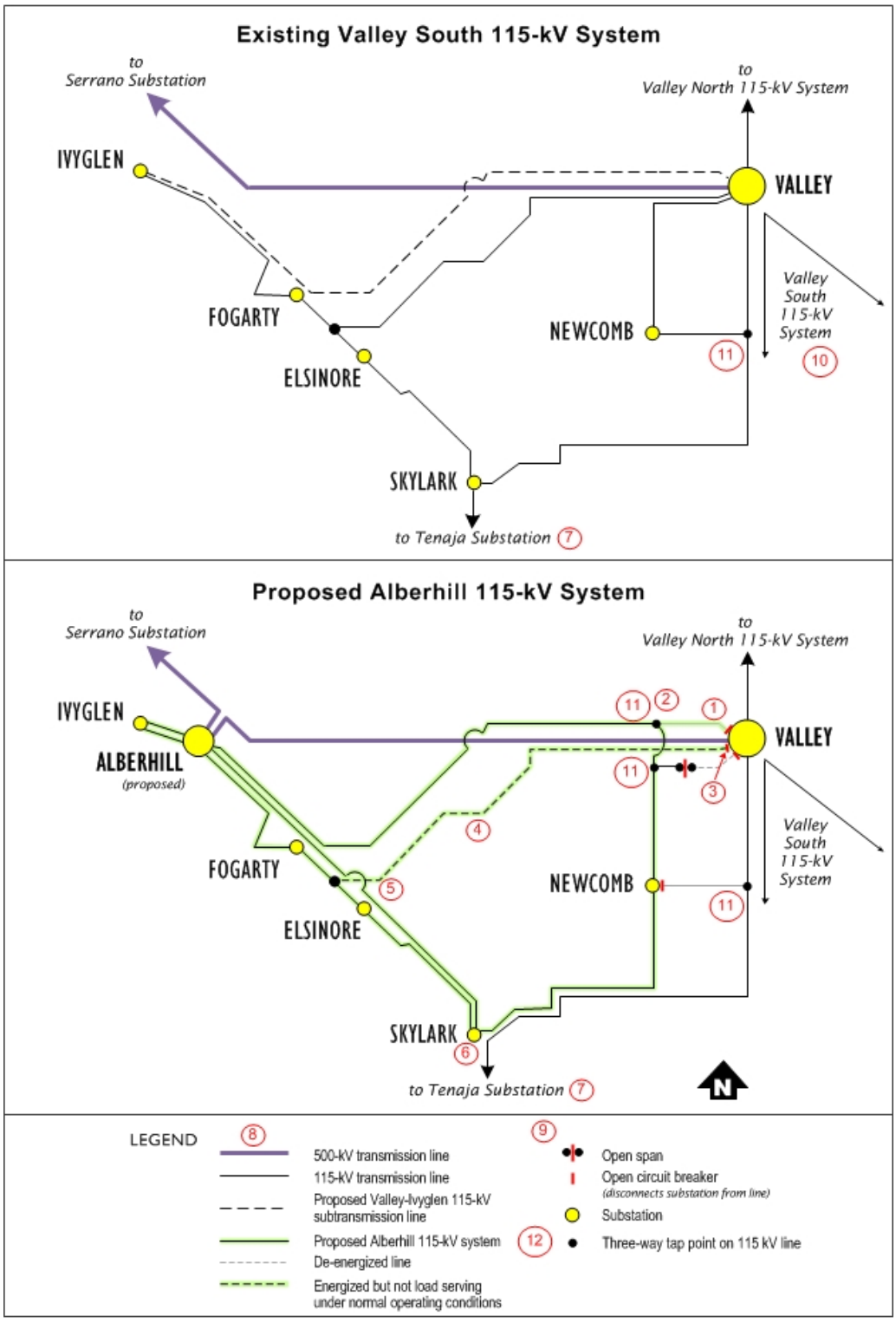
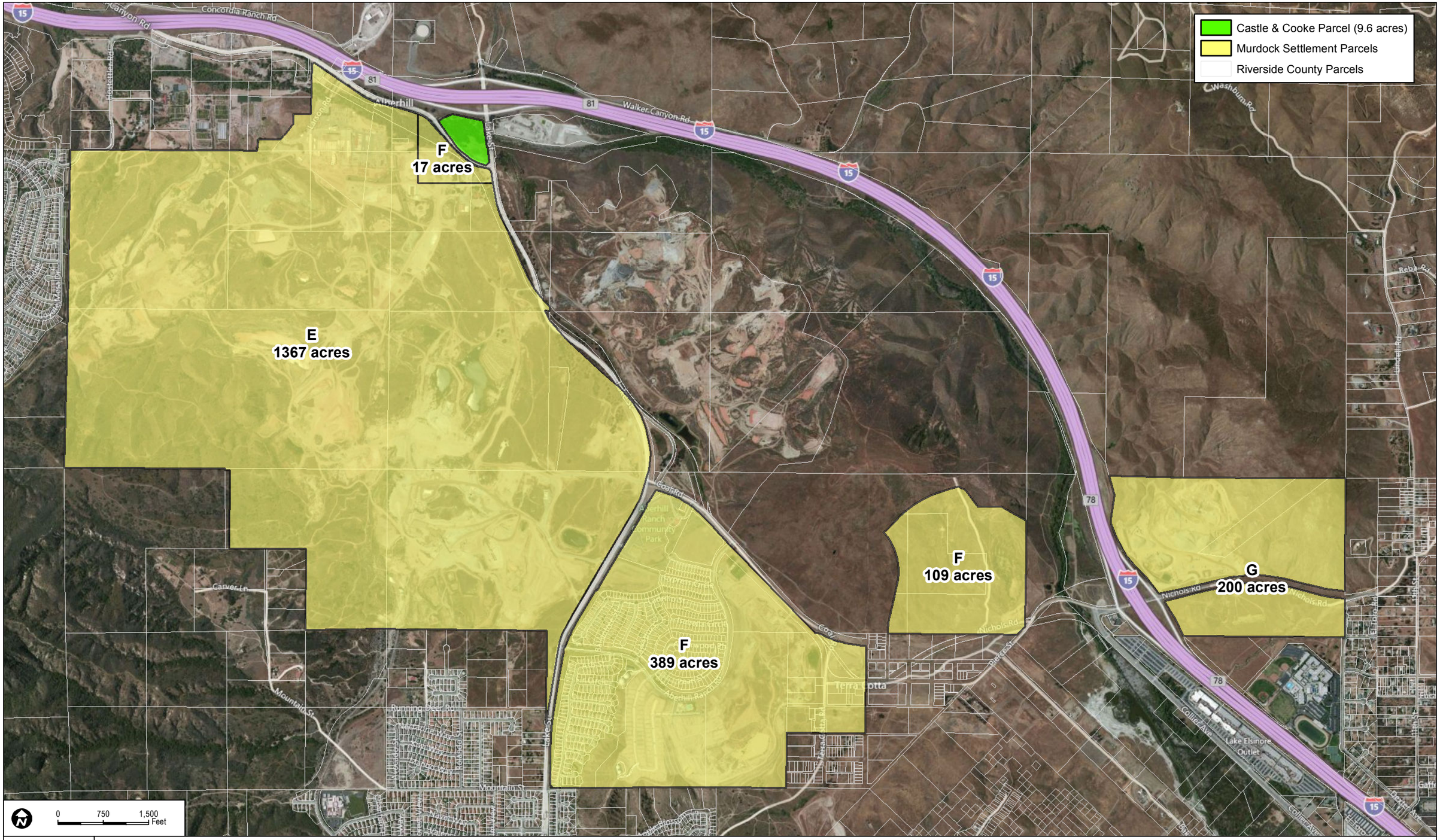


Figure 2-3

Technical Schematic of Existing and Proposed Systems
Alberhill and Valley-Ivyglen Projects
Riverside County, California

Edit #	Description
1	Dashed grey line should be solid grey with green highlight as it will be energized from Alberhill (but not serving load under normal conditions) but with an “Open circuit breaker” at Valley.
2	Remove “Closed switch” symbol. Switch will not be installed.
3	Add symbol for “Open circuit breaker” on the Valley segment of the Valley-Elsinore-Fogarty 115 kV Line.
4	Segment will be energized from Alberhill with an “Open circuit breaker” at Valley. Black segment of line to the left of “Closed switch” symbol should be grey and entire segment highlighted in green.
5	Remove “Closed switch” symbol. Provides no value as 115 kV line will be open at “Open circuit breaker” at Valley. Existing “Closed switch” will remain.
6	Remove “Open circuit breaker” symbol as 115 kV line will be removed from Skylark and reconfigured on the first pole outside of substation and then connected to Tenaja.
7	Should be changed “to Tenaja Substation” on both diagrams as it exists already.
8	Legend entry for 500 kV line should be changed from orange to purple to match diagram.
9	Remove legend entry for “Closed switch” as the symbol is no longer used in the diagrams.
10	Add “Valley South 115-kV System” symbol to first diagram.
11	Black dot should be added to denote three-way tap point on 115 kV line.
12	Add legend entry to define three-way tap point on 115 kV line.

ATTACHMENT D



DUDEK

JULY 2012

SOURCE: USFWS 2012; Bing Maps

FIGURE X

MSHCP Murdock Settlement/Castle & Cooke Properties

*Biological resources are not shown on this map.

ATTACHMENT E

Existing Conditions

Simulated View

Key Viewpoint (Alberhill Project Alt. DD Visual Simulation):
Northbound I-15 Looking Toward Proposed 115-kV Transmission Line
(115-kV Poles Near I-15 and Temescal Canyon Road)

ATTACHMENT F

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Aesthetics				
Impact AES-2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.		**Project Commitment A: Landscaping and Irrigation Plan**: For the Alberhill Project, ~~prior to the start of construction~~, the applicant would develop a Landscaping and Irrigation Plan for Alberhill Substation road frontage only along Temescal Canyon Road, Concordia Ranch Road and Love Lane that is consistent with surrounding community standards, substation security and safety requirements. The applicant would consult with Riverside County about the plan and incorporate applicable County recommendations to the extent possible. Landscaping would be designed to filter views from the surrounding community and other potential sensitive receptors near the proposed substation and be consistent with the surrounding community. The landscape plan would include a plant species list and installation and construction requirements. The applicant would contract a landscape architect to complete the landscaping plan during final engineering for the Alberhill Project. Irrigation and landscaping installation would occur after construction of the substation perimeter wall subtransmission and transmission poles/towers erected, underground utility lines/cable ducts installed, and water service has been established. During operations, the applicant would maintain the substation site pursuant to the Landscaping and Irrigation Plan and be responsible for upkeep as long as the applicant owns the property.	Verify preparation and implementation of landscaping and irrigation plan	During ~~Prior to Construction~~ and after construction
	Project Commitment D: Habitat Restoration and Revegetation Plan: With input from the appropriate resource agencies, the applicant would develop and implement a Habitat Restoration and Revegetation Plan to restore temporarily impacted areas where construction of the proposed project would be unable to avoid impacts on native vegetation and sensitive resources, such as wetlands, wetland buffer areas, riparian habitat, and other sensitive natural communities. The applicant would restore all temporarily impacted areas disturbed during construction of the proposed project, including staging areas and pull, tension, and splicing sites, to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner. Replanting and reseeding would be conducted under the direction of the applicant or contract biologists. If revegetation would occur on private property, revegetation conditions would be part of the agreement between the applicant and the landowner.	**Project Commitment D: Habitat Restoration and Revegetation Plan.**	Verify preparation and implementation of habitat restoration and revegation plan	Prior to Construction and after construction
	MM AES-1: Staging Area Screening. Staging areas will be screened with perimeter ~~screening~~ fences at least 6 ~~8~~ feet tall. Perimeter screening fences will ~~have~~ be ~~dark in color and covered with a dark~~ colored (e.g., dark green, beige, brown, or black) fabric or other material (e.g., slats) that provides at least 50 percent screening.	**MM AES-1: Staging Area Screening.**	Verify staging areas are screened	During construction
	MM AES-2: Segment VIG2 Wood Poles ~~Undergrounding~~. 115-kV Segment VIG2 shall be placed on wood poles ~~underground~~.		Verify placement of subtransmission line	Prior to, during, and post construction
		~~**MM AES-6: Hillside and Natural Slope Preservation.** The applicant will limit grading, cut, and fill to the minimum necessary to provide stable areas for drainage, structural foundations, parking facilities, access roads, poles, and other intended uses.~~	~~Verify minimization of grading and cut and fill~~	~~Prior to, during, and post construction~~
		MM AES-7: Alberhill Substation Visual Treatments. The applicant will ~~consult with a professional landscape architect licensed to work in California to determine what colors to use for the control building and perimeter wall and other~~ prepare a surface treatment plan for the aboveground non-steel structural elements ~~infrastructure~~ associated with the Alberhill Substation. Colors will be selected according to their ability to reduce the aesthetic impact of the substation and ancillary infrastructure. ~~The applicant will also consult with the landscape architect regarding visual treatments, in addition to color, that would reduce aesthetic impacts.~~ The applicant will consult with ~~obtain approval of the selected colors and visual treatments from~~ the California Public Utilities Commission prior to start of construction. All color finishes will be flat and non-reflective. Structural steel associated with the Substation will not be dulled. ~~TSPs, LWS poles, and LSTs within the SCE substation parcel must have color finishes that are dark in color or otherwise colored to help blend the structures with their surroundings. An acceptable treatment is a long-lasting darkening agent that bonds with metal or other surfaces to create a darkened finish.~~	Verify implementation of visual treatments as recommended by a CA RLA	Prior to, during, and post construction

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
		~~**MM AES-8: Treatment of 500-kV Transmission Towers.** 500-kV Towers SA2/R4, VA2/R5, SA3/R7, VA3/R8, SA4/R12, and VA4/R11 will have color finishes that are dark in color or otherwise colored to help blend the structures with their natural surroundings. An acceptable treatment is a long-lasting darkening agent that bonds with metal or other surfaces to create a darkened finish.~~	Verify implementation of visual treatments	Prior to, during, and post construction
Impact AES-3: Substantially degrade the existing visual character or quality of the site and its surroundings.	**Project Commitment D: Habitat Restoration and Revegetation Plan** **MM AES-1: Staging Area Screening.**	**Project Commitment D: Habitat Restoration and Revegetation Plan** **MM AES-1: Staging Area Screening.**	See above	See above
	MM AES-3: Glare Reduction. To reduce glare from components of the project, reduce color contrast between the project components and the surrounding landscape, and visually unify the project components with the surrounding landscape, the applicant shall: • Use non-specular conductor and guy wire for all powerlines installed as part of the projects Only use lightweight steel, hybrid, guy, and TSPs and LSTs with a galvanized steel that has been treated to create a dulled finish or non-toxic, long-lasting darkening agents that bond with metal or other surfaces and create a darkened finish (unless otherwise required by MM AES-7 ~~MM AES-8~~). ~~• As applicable, use steel for the switchrack enclosures and dead-end structures installed as part of Alberhill Substation with a flat finish that will weather to be dull and non-reflective.~~	**MM AES-3: Glare Reduction.**	Verify implementation of glare reduction measures	Prior to, during, and post construction
	MM AES-4: Lake Street Pole Placement and Landscaping. Poles installed along Lake Street for 115-kV Segment VIG5 and for the Fogarty–Ivyglen 115-kV Subtransmission line shall adhere to the following requirements: Poles shall be set back an average ~~minimum~~ of 20 feet from Lake Street's edge of pavement. Wood or galvanized steel poles with surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape shall be used along Lake Street ~~SCE shall plant trees with a maximum height and spread of 25 feet at maturity and a minimum height of 10 feet at planting, large shrubs, and other plants within the setback area between the subtransmission alignment and the Lake Street edge of pavement along the segment. Plantings shall be placed at intervals and in locations to maximize screening of lower portions of the transmission structures in views from the road. Plantings shall be drought tolerant. SCE shall be responsible for ensuring maintenance of the landscaping for five years.~~		Verify pole placement and landscaping	Prior to, during, and post construction
		MM AES-9. Use wood or galvanized ~~self-weathering~~ steel poles. Wood or galvanized steel poles with surface coatings with appropriate colors, finishes and textures to most effectively blend the structures with the visible backdrop landscape ~~Self-weathering steel poles~~ shall be used on all of 115-kV Segment ASP6 (except where undergrounding is required per MM AES-10) and 115-kV Segments ASP4 and ASP5 in the following locations: • 115-kV Segment ASP46 - From the intersection of Murrieta Road and La Piedra Road to the intersection of Murrieta Road and Craig Avenue. - From the intersection of Murrieta Road and Beth Avenue to the intersection of Murrieta Road and Scott Road/Bundy Canyon Road. • 115-kV Segment ASP5 - From the intersection of Murrieta Road and Scott Road/Bundy Canyon Road to 520 feet northeast of the intersection of Citrus Grove and Lemon Street. - From the intersection of Almond Street and Lemon Street to the intersection of Waite Street and Jo Ann Court.	Verify pole material	Prior to, during, and post construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
		MM AES-10. Undergrounding on Murrieta Road: 115-kV Segment ASP6 shall be undergrounded between Craig Avenue and Beth Drive along Murrieta Road.	Verify placement of subtransmission line	Prior to, during, and post construction
Impact AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	**MM AES-3: Glare Reduction.**	**MM AES-3: Glare Reduction.** **MM AES-7: Alberhill Substation Visual Treatments.** ~~**MM AES-8: Treatment of 500-kV Transmission Towers.**~~ **MM AES-9. Use wood or galvanized ~~self-weathering~~ steel poles.**	See above	See above
	MM AES-5: Night Lighting during Construction. To minimize the effect on any nearby sensitive receptors, lighting for construction activities, staging areas, and maintenance activities will be the minimum necessary to ensure safety and security for nighttime activities. All lighting used for nighttime construction activities will be oriented downward and shielded to eliminate off-site light spill at times when the lighting is in use. Any new s~~S~~afety and security lighting at staging areas or other areas established for long-duration construction activities, such as laydown areas, will be motion-activated or use timers to reduce impacts of nighttime lighting.	**MM AES-5: Night Lighting during Construction.**	Verify utilization of night lighting	During construction
Agriculture and Forestry				
Impact AG-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to non- agricultural use.	**Project Commitment I: Agricultural Uses:** Existing agricultural and grazing uses within the existing and proposed ROW areas shall be allowed to continue during operation of the proposed projects. In addition, the applicant shall coordinate construction and maintenance activities with agricultural landowners to avoid interference with grazing and agricultural activities unless such coordination is not possible due to emergency circumstances.	**Project Commitment I: Agricultural Uses**	Verify continued agricultural use	Post construction
Air Quality				
Impact AQ-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	**Project Commitment J: Air Emissions Controls.** The applicant would implement the following fugitive dust control measures for the Valley-Ivyglen Subtransmission Project: Water three times per day or as needed during excavation, bulldozing, scraping, and grading activities, in order to ensure compliance with SCAQMD Rule 403, Fugitive Dust. • Water storage piles twice a day, resulting in a 50% fugitive dust control efficiency. • Limit vehicle speeds on unpaved roads to 15 miles per hour, per SCAQMD's Table XI-A, Mitigation Measure Examples: Fugitive Dust from Construction and Demolition (Rev. 4/2007).	**Project Commitment J: Air Emissions Controls.**	Verify utilization of fugitive dust control measures	During construction
	MM AQ-1: Minimize NOX and PM emissions from off-road diesel powered construction equipment. To the extent available, the applicant shall utilize off-road diesel-powered construction equipment with engines greater than 150 horsepower that comply with Tier 4 interim or Tier 4 road emission standards (Tier 4 Standards). In the event that equipment with a Tier 4 Standards compliant engine is not available, that equipment shall be operated with tailpipe retrofit controls that reduce NOX and PM to no more than Tier 3 emission standards (Tier 3 Standards) levels. Equipment with a non-Tier 4 Standards compliant engine shall be utilized only when the applicant has made an unsuccessful good faith effort to locate equipment with a Tier 4 Standards compliant engine in the Valley–Ivyglen Project and Alberhill System Project vicinity (defined as within 200 miles of the applicable project site). Each such good faith effort shall be documented with written correspondence (or signed statement and electronic mail) by the appropriate construction contractor, along with written correspondence from at least two construction equipment rental firms within the defined vicinity confirming the unavailability of equipment with a Tier 4 Standards compliant engine.	**MM AQ-1: Minimize NOX and PM emissions from off-road diesel powered construction equipment.**	Verify utilization of Tier 4 Standard equipment	During construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	The applicant shall make available to the California Public Utilities Commission (CPUC) a copy of the certified tier specification, best available control technology documentation, and/or CARB or SCAQMD operating permit for each piece of construction equipment, as applicable, at the time the equipment is mobilized. In addition, the applicant shall: • Maintain construction equipment according to manufacturing specifications and use low-emissions equipment; • Reduce emissions of PM and other pollutants by using, whenever feasible, alternative clean fuel technology to power vehicles and equipment instead of gasoline- or diesel-powered engines (e.g., electric, hydrogen fuel cell, propane, natural gas, or compressed natural gas-powered equipment with oxidation catalysts); Ensure that all construction equipment is properly tuned and maintained and shut off when not in direct use; • Prohibit engine tampering to increase horsepower; • Locate engines, motors, and equipment as far as possible from residential areas and other sensitive receptors, such as schools, daycare centers, and hospitals; • Encourage ~~Provide~~ carpooling ~~shuttles and vans to transport construction workers~~ to and from staging yards to construction sites to minimize private vehicle use; • Minimize construction-related transport of workers and equipment including trucks; and • Require that on-road vehicles utilized during construction meet CARB fleet regulations ~~be less than 10 years old~~.			
	MM AQ-2: Oxides of Nitrogen (NOX) Credits. The remaining emissions of NOX resulting from construction of the proposed projects shall be mitigated through the purchase of Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs for every pound of NOX in excess of the SCAQMD regional significance threshold of 100 pounds per day, as measured per project. The total amount of NOX RTCs to be purchased shall be calculated once the construction schedules for each project are finalized. The applicant shall purchase and submit documentation of purchase of the required NOX emission credits to the SCAQMD prior to the start of construction of each project. ~~The applicant shall also track actual daily emissions during construction of each project according to a monitoring plan, which shall require keeping records of equipment and vehicle usage for each project.~~	**MM AQ-2: Oxides of Nitrogen (NOX) Credits.**	Verify the purchase of NOx credits	Prior to and after construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	~~**MM AQ-3: Additional Fugitive Dust Controls.** During construction activities, the applicant shall implement the following measures to minimize impacts due to fugitive dust emissions:~~ ~~• Use a gravel apron, to reduce mud/dirt trackout from unpaved truck exit routes. Dimensions of such apron shall be 25 feet long by the width of the exit road.~~ ~~• Ensure minimum soil moisture of 12 percent for earthmoving activities by use of a moveable sprinkler system or a water truck. Moisture content shall be measured using a moisture probe onsite and reported to the CPUC on a monthly basis.~~ ~~• Apply chemical soil stabilizers on inactive construction areas or disturbed lands within construction areas that are unused for at least four consecutive days.~~ ~~• All trucks hauling dirt, sand, soil, or other loose materials shall be tarped with a fabric cover and maintain a freeboard height of 12 inches.~~	~~**MM AQ-3: Additional Fugitive Dust Controls.**~~	~~Verify utilization of fugitive dust control measures~~	~~During construction~~
		MM AQ-5: Volatile Organic Compounds Credits. The remaining emissions of VOC/reactive organic gas (ROG) resulting from construction of the proposed Alberhill Project shall be mitigated through the purchase of Emissions ~~Trading~~ Reduction Credits (~~ETCs~~ ERCs)/Short-Term Emission Reduction Credits (STERCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of ERCs/STERCs and MSERCs for every pound of VOC/ROG in excess of the SCAQMD regional significance threshold of ~~100~~ 75 pounds per day, as measured. The total amount of VOC/ROG ETCs to be purchased shall be calculated once the construction schedule is finalized. The applicant shall purchase and submit documentation of purchase of the required ETC to the SCAQMD prior to construction. ~~The applicant shall also track actual daily emissions during construction according to the monitoring plan, which shall require keeping records of equipment and vehicle usage for the project.~~	Verify the purchase of VOC credits	Prior to and after construction
Impact AQ-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	**Project Commitment J: Air Emissions Controls.** **MM AQ-1: Minimize NOx and PM emissions from off-road diesel powered construction equipment.** **MM AQ-2: Oxides of Nitrogen (NOX) Credits.** ~~**MM AQ-3: Additional Fugitive Dust Controls.**~~	**Project Commitment J: Air Emissions Controls.** **MM AQ-1: Minimize NOX and PM emissions from off-road diesel powered construction equipment.** **MM AQ-2: Oxides of Nitrogen (NOX) Credits.** ~~**MM AQ-3: Additional Fugitive Dust Controls.**~~ **MM AQ-5: Volatile Organic Compounds (VOC) Credits.**	See above	See above
Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations		**Project Commitment J: Air Emissions Controls.** **MM AQ-1: Minimize NOx and PM emissions from off-road diesel powered construction equipment.** ~~**MM AQ-3: Additional Fugitive Dust Controls.**~~	See above	See above
Impact AQ-5: Create objectionable odors affecting a substantial number of people.	**MM AQ-4: Odor Reduction at Staging Yard VIG13.** At Staging Yard VIG13, heavy equipment use shall be conducted at least 36 feet away from the Southern California Online Academy property.		Verify use of heavy equipment	During construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Biological Resources				
	Project Commitment B: Worker Environmental Awareness Plan. Prior to construction, a Worker Environmental Awareness Plan would be developed based on final engineering designs, the results of preconstruction surveys, and mitigation measures developed by the California Public Utilities Commission (CPUC). A presentation would be prepared by the applicant and shown to all site workers prior to their start of work. A record of all trained personnel would be kept with the construction foreman. In addition to the instruction for compliance with any site-specific biological or cultural resource protective measures and project mitigation measures, all construction personnel would also receive the following: • A list of phone numbers of the applicant's personnel (i.e., archeologist, biologist, environmental compliance coordinator, and regional spill response coordinator); • Instruction on the South Coast Air Quality Management District Rule 403 for control of dust; • Instruction on what typical cultural resources look like, and if discovered during construction, to suspend work in the vicinity of any find and contact the site foreman and archeologist or environmental compliance coordinator; • Instruction on washing the wheels, tracks, and underbodies of construction vehicles to minimize the spread of invasive species; • Instruction on individual responsibilities under the CWA, the Storm Water Pollution Prevention Plan (SWPPP) for the proposed projects, site-specific Best Management Practices (BMPs), and the location of Material Safety Data Sheets for the proposed projects; • Instructions to notify the foreman and regional spill response coordinator in case of hazardous materials spills and leaks from equipment or upon the discovery of soil or groundwater contamination; • Instructions to follow worker safety guidelines and policies in the event of an earthquake; • A copy of the truck routes to be used for material delivery; and • Instruction that noncompliance with any laws, rules, regulations, or mitigation measures could result in being barred from participating in any remaining construction activities associated with the proposed projects.	**Project Commitment B: Worker Environmental Awareness Plan.**	Verify the preparation and implementation of worker environmental awareness plan	Prior to and during construction
	Project Commitment C: Raptor Protection on Power Lines. The applicant would design all 115-kV subtransmission structures consistent with the *Suggested Practices for Avian ~~Raptor~~ Protection on Power Lines: The State of the Art in 2006* (APLIC 2006).	**Project Commitment C: Raptor Protection on Power Lines.**	Verify implementation of APLIC recommendations	Prior to and during construction
	Project Commitment D: Habitat Restoration and Revegetation Plan.	**Project Commitment D: Habitat Restoration and Revegetation Plan.**	See above	See above

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	Project Commitment H: Noise Control. • All construction and general maintenance activities, except in an emergency or within enclosed structures which reduce the noise to less than significant, shall be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and ~~all legally proclaimed~~ holidays recognized by the local jurisdictions. ~~If the California Independent System Operator (CAISO) and/or Caltrans require that conductor stringing over freeways or highways occur after 7:00 p.m., or on a Sunday, SCE would obtain variances from all applicable jurisdictions.~~ In the event that construction activities are necessary on days or hours outside of what is specified by the local ordinance, SCE would provide advanced notification, including a general description of the work to be performed, location and hours of construction anticipated, to the CPUC, the local jurisdiction, and residents within 300 feet of the anticipated work. • 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. • Construction traffic shall be routed away from residences and schools where feasible. • Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. A "common sense" approach to vehicle use shall be applied; if a vehicle is not required for use immediately or continuously for construction activities, its engine should be shut off. Note: certain equipment, such as large diesel-powered vehicles require extended idling for warm-up and repetitive construction tasks. • The applicant will notify all receptors within 3500 feet of construction of the potential to experience significant noise levels during construction. • During construction, the applicant will use a temporary noise barrier between the construction area and the residence ~~sound walls, noise-reduction blankets, or other noise reduction measures prior to developing the project site~~ in areas where sensitive receptors would be subjected to significant noise impacts. Significant noise impacts would occur if sound levels exceed 90 dBA in Riverside County and the Cities of Wildomar and Menifee, 80 dBA in the City of Perris, and 75 dBA in the City of Lake Elsinore. • The applicant would shield small stationary equipment with portable barriers within 100 feet of residences, where feasible. • The applicant would minimize engine idling and turn off engines when not in use. • Where blasting is required, the applicant would conduct additional pre-blast notification and coordination with residents, utilities, and others that may be affected by blasting operations.	**Project Commitment H: Noise Control. All construction and general maintenance activities, except in an emergency or within enclosed structures which reduce the noise to less than significant, would be limited to the hours of 7:00 a.m. to 7:00 p.m. and prohibited on Sundays and ~~all legally proclaimed~~ holidays recognized by the local jurisdictions.**	Verify implementation of noise control measures	During construction
	Project Commitment I: San Diego Ambrosia. During construction, ground-disturbing activities including parking and staging of equipment and vehicles off-road within 50 feet of known populations of San Diego Ambrosia, the following will be implemented: Work should occur in the late summer/early fall (August to October) to avoid: 1) the San Diego ambrosia blooming season and 2) wet soil conditions during the rainy season when work could result in damage to the growing plant/rhizomes. If work, such as pole brushing, is required at other times, a biological monitor will be present to locate the San Diego ambrosia for avoidance. As a general rule, no work is allowed within 72 hours following a rain event but dry site conditions will be verified by crews prior to initiation of work. If equipment and vehicles need to be situated over the plant population, metal grates or plywood sheets (depending on the size of equipment) will be placed over the plants temporarily. A biological monitor will be present during ground disturbing activities to ensure avoidance and minimization of impacts to San Diego Ambrosia.	**Project Commitment I: San Diego Ambrosia.**	Verify implementation	During construction
	Project Commitment K: Wildlife Movement. In the event that retaining walls or some other structural method of slope stabilization would be needed, walls will be sited, designed, and oriented	**Project Commitment K: Wildlife Movement.**	Verify implementation	Prior to Construction

	to minimize impacts to movement of native resident wildlife species and established wildlife corridors, in coordination with the RCA, USFWS, and CDFW.			
	MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas. ~~Outside MSHCP boundaries, v~~Vehicular traffic (including movement of all equipment) shall be restricted to approved access roads and established construction areas shown in Figure 2.4~~6~~ of the EIR. These areas shall be delineated in the field with flagging and signage. If disturbance is required outside the established construction areas, CPUC notification and approval shall be required. Sensitive resources such as waterbodies, oak trees, and special status plant populations shall be clearly marked for avoidance with flagging and signage. Nighttime lighting, if necessary adjacent to aquatic areas, shall be shielded away from these areas to prevent impacts on aquatic wildlife.	**MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.**	Verify avoidance of wetlands	During construction
	MM BR-2: Preconstruction Surveys. Qualified biologists shall conduct preconstruction surveys for burrowing owl and other sensitive species no more ~~less~~ than ~~seven~~ 30 days prior to the start of construction ~~in any given project construction area~~. Surveyors shall focus on areas proposed for vegetation removal or ground disturbance that are within habitat that a qualified biologist has deemed suitable for sensitive species. ~~As part of preconstruction surveys, the composition of the vegetation community shall be surveyed to establish baseline conditions prior to construction and to guide post-construction restoration efforts.~~ The surveys shall be conducted to relocate and flag for avoidance known ~~determine the presence of~~ special status plants, noxious weeds, and all wildlife species for the purpose of preventing direct loss of vegetation and wildlife and the spread of noxious plant species. Preconstruction surveys shall be performed for each discrete work area prior to the start of ground disturbance, or if work has lapsed for longer than three months ~~one week~~. Biologists shall document survey results in a daily logbook or report.	**MM BR-2: Preconstruction Surveys.**	Verify the completion of survey	Prior to construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	MM BR-3: Biological Monitoring During Construction. In areas where sensitive resources may be impacted by construction activities, a qualified biological monitor shall be present during construction activities. Prior to initiation of vegetation clearing or ground disturbing activities in sensitive habitat, on a daily basis, the monitor will survey the work area for sensitive species and flag biological resources for avoidance during construction. The monitor shall have the authority to temporarily stop work that he or she determines to be threatening to a special status wildlife or plant species or nesting bird. The monitor shall determine appropriate action, and work will resume once the monitor determines there is no longer a threat to the special status species or approval has been obtained from the appropriate wildlife agencies or CPUC. Biologists shall document survey results in a daily logbook.	**MM BR-3: Biological Monitoring During Construction.**	Verify the monitoring of construction activities	During construction
	MM BR-4: Limit Removal of Native Vegetation Communities and Trees. ~~For project areas located outside the MSHCP boundaries, t~~The removal of native vegetation and trees shall be limited to the minimum practicable area required for construction of the project. Grading, grubbing, graveling, or paving shall only occur where required for construction and operations ~~for permanent project components~~. The applicant shall restore temporary staging areas to as close to pre-construction conditions as possible, or to the conditions agreed upon between the applicant and landowner ~~use temporary staging areas in a way that facilitates post-construction restoration~~.	**MM BR-4: Limit Removal of Native Vegetation Communities and Trees.**	Verify the minimization of native vegetation removal	During construction
	MM BR-5: California gnatcatcher protection measures. In accordance with the MSHCP, removal of occupied coastal California gnatcatcher habitat on Public/Quasi-Public lands and within the MSHCP criteria area will occur outside of the breeding season, which is defined by the MSHCP as 1 March through 31 August. ~~A qualified biologist shall conduct preconstruction surveys no more than seven days prior to removal of Riversidean sage scrub habitat during the coastal California gnatcatcher breeding season (15 February through 15 August). Should nesting coastal California gnatcatcher be observed during preconstruction surveys, vegetation removal and other construction-related disturbance shall not commence within the applicable nest buffer area, as identified in the projects' Nesting Bird Management Plan, until the nest is determined to be inactive.~~	**MM BR-5: California gnatcatcher protection measures**.	Verify the implementation of protection measures	During construction
	MM BR-6: Oak tree protection measures. This measure applies to oak trees in all project areas. Preventive measures shall be taken during construction activities to minimize impacts in the protected zone of each oak tree. The protected zone commences at a point 5 feet outside the dripline and extends inward to the trunk of the tree. All work conducted in the protected zone of oak trees shall be performed using hand implements and in the presence of a certified arborist. If it is determined that oak tree removal is necessary, the applicant shall relocate oak trees to a place outside of the area of anticipated impacts under the direction of the certified arborist. If the applicant cannot feasibly relocate oak trees that are removed, 15-gallon oak trees or larger shall be planted at a 2:1 ratio within the appropriate habitat to replace removed trees. These replacement trees shall be indigenous coast live oak trees that have been grown in a natural form (no topping or street tree forming). The applicant shall be responsible for monitoring and maintaining the relocated or replacement trees for a minimum of two years. In addition, the following minimization measures shall be implemented under the direction of the certified arborist: • Equipment, materials, and vehicles shall not be stored, parked, or operated within the protected zone of an oak tree, except on sites approved for this use by a certified arborist. • Removal of the natural leaf mulch within the protected zone of oak trees is prohibited except where absolutely necessary. • All trees not approved for removal shall be fenced or flagged for avoidance and to designate the protected zone. • Any pruning, including removal of dead wood, shall be performed in compliance with the latest	**MM BR-6: Oak tree protection measures.**	Verify the implementation of protection measures	During construction

	American National Standards Institute pruning standards by a certified arborist (or certified tree worker). • Any root-pruning required within the protected zone of an oak shall be limited to the minimum amount necessary. All root-pruning shall consist of clean, 90-degree angle cuts utilizing sharp hand tools. Any major roots (2 inches or greater in diameter) encountered shall be preserved to the extent possible and wrapped in moist burlap until the soil is replaced. Soil shall be replaced around preserved roots as soon as possible.			

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	MM BR-7: Habitat Restoration and Revegetation Plan Requirements. Pursuant to Project Commitment D, the applicant shall develop a Habitat Restoration and Revegetation Plan to address ground disturbance in all project areas. In addition to including the provisions set forth in Project Commitment D, the Habitat Restoration and Revegetation Plan shall detail topsoil segregation and conservation methodology; restoration of special status plant species habitat; vegetation removal and revegetation methods, including seed mixes, rates, and transplants; criteria to monitor and evaluate revegetation success; and alternative restoration and revegetation methods in the event that the revegetation success criteria are not initially reached. The applicant shall implement the Habitat Restoration and Revegetation Plan until the restoration success criteria are achieved. Appropriate agencies (CPUC, USFWS, and CDFW) shall be consulted during the preparation of the Habitat Restoration and Revegetation Plan. A copy of the final Habitat Restoration and Revegetation Plan, along with documentation of agency review and incorporation of comments into the final version, shall be provided to the CPUC for approval prior to the CPUC issuing a notice to proceed.	**MM BR-7: Habitat Restoration and Revegetation Plan Requirements.**	Verify the preparation and implementation of habitat restoration and revegetation plan	Prior to, during, and post construction
	~~**MM BR-8: Special Status Plant Avoidance and Mitigation Measures.** For project areas located outside MSHCP boundaries, the applicant shall avoid the special status plant populations listed in Appendix G, Table 1. However, where avoidance is not feasible, special status plants in project work areas shall be identified in the field, and the following avoidance measures shall be implemented to minimize the possibility of inadvertent encroachment:~~ ~~– A qualified biologist shall flag or otherwise mark special status plants. Construction crews will avoid direct or indirect impacts on these flagged areas. Should impacts on special status plants be unavoidable, the applicant will implement the following measures:~~ ~~– A qualified botanist shall determine if transplantation is feasible. If determined feasible, a qualified botanist shall develop and implement a transplantation plan in coordination with appropriate agencies (CDFW, RCA). The special status plant transplantation plan shall identify a suitable transplant site, moving the plant material and seed bank to the transplant site, collecting seed material and propagating it in a nursery, and monitoring the transplant sites to document recruitment and survival rates.~~ ~~– If transplantation is infeasible, the applicant shall replace impacted special status plants at a 2:1 ratio within the project area within one year of the end of construction. Measures to restore special status plants shall be implemented in accordance with the Habitat Restoration and Revegetation Plan (MM BR-7).~~	~~**MM BR-8: Special Status Plant Avoidance and Mitigation Measures.**~~	~~Verify the implementation of protection measures~~	~~During construction~~
	MM BR-9: Invasive Plant Control Measures. The applicant shall develop an Invasive Plant Management Plan outlining measures to prevent the spread of invasive plants such as tamarisk (*Tamarix* sp.) and giant reed (*Arundo donax*) during construction of the projects. The Invasive Plant Management Plan shall include, but is not limited to, the following measures: • Off-road ~~All vehicles and~~ equipment shall be cleaned prior to arrival at the work site or after the equipment has worked outside the weed zone. • If s~~S~~traw or hay bales are used for sediment barrier installations or mulch distribution shall be obtained from weed-free sources. The Invasive Plant Management Plan will be submitted to the CDFW and CPUC for review and comment no more than three months prior to the start of construction. A copy of the final Invasive Plant Management Plan, along with documentation of agency review (CDFW and CPUC) and incorporation of comments into the final version, shall be provided to the CPUC for approval prior to the CPUC issuing a notice to proceed.	**MM BR-9: Invasive Plant Control Measures.**	Verify the preparation and implementation of invasive plant management plan	Prior to and during construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	MM BR-10: Prevent Wildlife Entrapment. In all project work areas, the applicant shall install covers, ramps, and/or fencing to avoid trapping wildlife in excavations or trenches. Covers must be weighted at the edges or installed in a way that prevent wildlife from attempting to burrow beneath the cover. Fine-gauge fencing shall be used to prevent small animals from passing through the fence. Ramps with an angle of less than 45 degrees shall be utilized. The applicant's biological monitor will check open trenches and excavations for trapped wildlife each morning prior to the start of work on the trench or excavation. Trenches and excavations that are covered for more than one week will be inspected on a weekly basis. In addition, where retaining walls or another method of slope stabilization are required, the facility shall be sited, designed, and oriented to avoid impacts on the movement of native wildlife species and established wildlife corridors in coordination with the wildlife agencies (USFWS, CDFW, RCA).	**MM BR-10: Prevent Wildlife Entrapment.**	Verify the prevention of wildlife entrapment	During construction
	MM BR-11: Migratory Birds and Raptors Impact Reduction Measures. The applicant shall develop a Nesting Bird Management Plan in consultation with the USFWS and CDFW that outlines protective measures and BMPs that shall be employed in all project work areas to prevent disturbance of active nests. The final Plan shall be submitted to the CPUC for approval. The Nesting Bird Management Plan shall include the following components: species-specific buffer distances (including vertical buffers in areas where helicopters will be used) and conditions under which these buffer distances can be reduced, including concurrence by the CDFW, USFWS, and CPUC for special status species; dates of local breeding seasons during which nest surveys shall be conducted; preconstruction nest survey timing, methods, and surveyor qualifications; nest deterrent methods, including vegetation clearing; monitoring and reporting protocols during construction; protocols for determining whether a nest is active; protocols for documenting, reporting, and protecting active nests within construction areas; and avian monitor qualifications. If preconstruction survey protocols exist for a certain species, the Nesting Bird Management Plan shall incorporate these protocols. The survey area shall include the construction area, plus an additional distance large enough to accommodate the protective buffer of bird species likely to occur in proximity to the construction area. The Nesting Bird Management Plan shall further specify that active bird nests shall not be removed during breeding season unless the projects are expressly permitted to do so by the USFWS or CDFW; all project-related nest failures shall be reported to the USFWS and CDFW; and the biological monitor shall halt work if he or she determines that active nests would be disturbed by construction activities. If construction begins during the breeding season (February 1 through August 31), the Nesting Bird Management Plan shall be submitted to the USFWS and CDFW for review and comment no less than <u>two</u> ~~six~~ months prior to the start of construction, with the intent that the plan will be finalized no less than <u>one</u> ~~two~~ months prior to the start of construction. A copy of the final Nesting Bird Management Plan, along with documentation of agency review (CDFW, USFWS, CPUC) and incorporation of comments into the final version, shall be provided to the CPUC for approval prior to the CPUC issuing a notice to proceed during the breeding season.	**MM BR-11: Migratory Birds and Raptors Impact Reduction Measures.**	Verify the preparation and implementation of nesting bird management plan	Prior to and during construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	MM BR-12: Burrowing Owl Impact Reduction Measures. To reduce impacts on burrowing owls, the applicant shall implement the following measures in all project work areas: • Surveys for burrowing owls will be conducted by a qualified biologist within 30 days of construction during the non-breeding season and within 14 days of construction during the breeding season (February 1 through August 31) to confirm whether burrowing owls occupy the site. Surveys shall be performed throughout the project areas that contain suitable burrowing owl habitat, with a potential to be impacted by construction activities, plus an additional area extending 300 feet from the projects' boundaries. • If an occupied burrow is identified, the applicant shall use the ~~adhere to~~ buffer distances detailed in the *Staff Report on Burrowing Owl Mitigation* (CDFW~~CDFG~~ 2012) as guidance. To avoid direct and indirect impacts to active nests, all occupied burrows will be flagged and construction buffers established in cooperation with CDFW, generally described as follows. o 160 feet from occupied burrows during non-nesting season o 500 feet from occupied burrows during the nesting season (February 1 through August 31). Should this buffer not be able to be maintained, the closest distance allowable will be 300 feet, and the qualified biologist shall monitor the owls for signs of stress and/or other behavioral changes to determine if construction should be halted and discussions initiated with CDFW on an appropriate course of action. • The biologist will report all project-related impacts on burrowing owl to the appropriate resource agencies (CDFW and RCA~~, depending on the location of the impact~~). • If the appropriate buffers cannot be maintained and impacts on the burrowing owl and/or their habitat (i.e., ~~owls or~~ occupied burrows) are unavoidable, the applicant will ~~shall~~ develop and implement a DBESP in compliance with MSHCP Section 6.3.2 ~~Burrowing Owl Compensation Plan~~, as approved by ~~in consultation with~~ the CDFW and RCA, ~~that is consistent with mitigation guidelines as outlined in the *Staff Report on Burrowing Owl Mitigation*~~ (~~CDFG~~ 2012). The DBESP will ~~guidelines for burrowing owl mitigation and compensation, as appropriate. The Burrowing Owl Compensation Plan shall~~ describe the compensatory measures that will be undertaken to address the loss of burrowing owl burrows within the project area. Compensatory measures will be determined based on a site-specific analysis but may ~~The compensatory mitigation shall~~ include restoration of temporarily impacted habitat and acquisition and/or enhancement of off-site mitigation lands as determined in consultation with the CDFW. If avoidance of ~~mitigation for permanent impacts on nesting, occupied, and satellite~~ burrows cannot be maintained, on-site passive relocation of owls is preferred over active relocation. To compensate for loss of burrows, the Applicant will provide two alternate natural (enlarged or cleared of debris) or artificial burrows in nearby contiguous foraging habitat for each ~~and occupied burrowing~~ owl displaced within the project area. Prior to collapsing burrows vacated through passive relocation, burrow excluders should be placed over the burrow not less ~~habitat by permanent conservation of vegetation communities comparable to or better~~ than 48 hours prior to the collapse. On the day of the exclusion, the burrows shall be checked using a video camera probe. The Applicant's biological monitor will conduct daily monitoring for a two-week period to check on burrowing owl use of the alternate burrows. ~~the impacted area on sufficiently large acreage containing fossorial mammals.~~	**MM BR-12: Burrowing Owl Impact Reduction Measures.**	Verify the implementation of protection measures	During construction
	MM BR-13: Trash Abatement. The applicant shall keep project areas free of trash and debris. Food-related trash items shall be stored in enclosed containers and regularly removed from site.	**MM BR-13: Trash Abatement.**	Verify trash removal	During construction

	MM BR-14: Protection of Special Status Species without the MSHCP ~~on Castle and Cooke Land.~~ The applicant is obtaining PSE status through issuance of a Certificate of Inclusion (COI) from ~~entering into an agreement with~~ the RCA, with USFWS and CDFW concurrence to allow for MSHCP coverage over ~~of~~ the entire alignments of the Valley–Ivyglen and Alberhill Projects.~~'~~ ~~obligations under the MSHCP. on Castle and Cooke property which falls outside MSHCP boundaries and thus is exempt from mitigation under the MSHCP~~. If this COI ~~agreement~~ is finalized prior to the start of construction, it shall be in effect for the duration of the project~~s or until SCE opts out~~. Should SCE opt out of the MSHCP, or if this agreement with the RCA is not finalized, the applicant shall implement the same or a greater level of species-specific avoidance, mitigation, restoration, and compensation measures as would have been required under the MSHCP. This may also include additional consultation with USFWS and CDFW to obtain Incidental Take Authorization pursuant to the Federal and California Endangered Species Acts. Implementation of ~~These~~ additional measures would also include MM BR-1~~,~~ and MM BR-4, ~~and MM BR-8.~~	**MM BR-14: Protection of Special Status Species without the MSHCP ~~on Castle and Cooke Land.~~**	Verify the implementation of protection measures	During construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
		MM BR-16: Stephens' Kangaroo Rat Take Avoidance within Core Reserve. The applicant shall ensure that take of SKR within the Lake Mathews-Estelle Mountain Core Reserve does not occur during any project construction activity. To avoid take of SKR, the following measures shall be implemented: ***Daylight Hours Only*** • No vehicle or equipment use for any project construction activity shall occur within the Core Reserve or on its roadways within 30 minutes prior to sunset or 30 minutes after sunrise except during an emergency condition. If an emergency condition occurs and nighttime access or use is necessary, the CPUC shall be notified within 24 hours. To the extent feasible, biological monitors qualified to monitor for SKR shall be present during emergency access to the Core Reserve. ***Monitoring*** • No more than 14 days prior to conducting any project construction activity within the Core Reserve, biological monitors qualified to monitor for SKR shall complete preconstruction surveys and flag confirmed and potential SKR burrow complexes (including burrows that may be used by other kangaroo rat species) for avoidance. ~~Survey areas shall include Lake Street and all access roads to 500-kV tower sites evaluated in the EIR and approved by the CPUC for construction access, plus a 25-foot buffer area (except in areas inaccessible by foot) on each side of these roads.~~ Surveyed and flagged areas shall also include all 500-kV ROWs to be accessed within the Core Reserve plus a 25-foot buffer area (except in areas inaccessible by foot) on each side of these roads. ***Vehicle Use*** • Vehicle use and worker access within the Core Reserve shall be minimal. Vehicles shall not travel faster than 10 miles per hour within the Core Reserve. All construction vehicles and equipment shall remain on existing access and maintenance roads used to access the applicant's 500-kV towers within the Core Reserve. • Biological monitors qualified to monitor for SKR shall accompany all workers to and from all work sites within the Core Reserve, and shall conduct daily clearance sweeps immediately prior to any project construction activity for all areas within the Core Reserve to be accessed that day. • If activities at 500-kV tower sites adjacent to the Core Reserve require equipment to back up into the Core Reserve on areas that are not existing access roads, biological monitors qualified to monitor for SKR shall monitor the process of backing up and exiting the Core Reserve areas and all activities that occur in proximity to the equipment while it is located within the Core Reserve area. Equipment shall be carefully inspected by the monitors for SKR prior to backing up or exiting the Core Reserve area. If SKR are present, the equipment shall not be moved until all SKR have left the equipment and all areas within 20 feet of the equipment. ***Signage*** • Clearly marked and visible signs listing the required speed limit and reminding drivers to watch for and avoid kangaroo rats shall be posted at the entry point into the Core Reserve and at regular intervals thereafter (at minimum every 0.25 miles) along all roads to be accessed within the Core Reserve. ***Other Requirements*** • The applicant shall not access the 0.5-mile access road ~~Hilltop Road~~ segment located within the Core Reserve between 500-kV Towers M13-T2 ~~12~~ and M13-T1 other than by foot or helicopter. If accessed by foot or helicopter, no more than 14 days prior to access, preconstruction surveys shall be conducted along the 0.5-mile Hilltop Road segment to identify and flag potential kangaroo rat burrow complexes for avoidance. No activities other than grounding and wire snubbing and vehicle use required for these activities shall occur at 500-kV tower sites located within the Core Reserve.	Verify the implementation of protection measures	During construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Impact BR-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.	**Project Commitment J: ARL Land.** Temporary impacts to MSHCP ARLs will be restored to greatest extent practicable using species present prior to disturbance. Should any permanent impacts to ARL result during construction, the Applicant will dedicate biologically equivalent or superior land to the MSHCP. The Applicant will prepare an ARL equivalency analysis to be included as part of the MSHCP PSE submittal. This equivalency analysis will compare the potential effects on the ARL to the benefits of proposed replacement land, including compensation for potentially lost conservation functions and values. The analysis will consider specific project design features, siting and design, and MSHCP BMPs, as well as address effects on covered species and habitats, core areas, linkages, constrained linkages, MSHCP Conservation Area configuration and management, and ecotones. The replacement land ratio is anticipated to be not less than 2:1 within MSHCP Core 1 but will ultimately be determined through MSHCP consistency findings made by RCA, CDFW and USFWS concurrence as part of the MSHCP PSE process.	**Project Commitment J: ARL Land.**	Verify land dedication	Prior to and during construction
	Project Commitment B: Worker Environmental Awareness Plan. **Project Commitment D: Habitat Restoration and Revegetation Plan.** **MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.** **MM BR-2: Preconstruction Surveys.** **MM BR-3: Biological Monitoring During Construction.** **MM BR-4: Limit Removal of Native Vegetation Communities and Trees.** **MM BR-6: Oak tree protection measures.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **MM BR-9: Invasive Plant Control Measures.**	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment D: Habitat Restoration and Revegetation Plan.** **MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.** **MM BR-2: Preconstruction Surveys.** **MM BR-3: Biological Monitoring During Construction.** **MM BR-4: Limit Removal of Native Vegetation Communities and Trees.** **MM BR-6: Oak tree protection measures.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **MM BR-9: Invasive Plant Control Measures.**	See above	See above
Impact BR-3: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	**Project Commitment J: ARL Land.** **MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.** **MM BR-2: Preconstruction Surveys.** **MM BR-3: Biological Monitoring During Construction.**	**Project Commitment J: ARL Land.** **MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.** **MM BR-2: Preconstruction Surveys.** **MM BR-3: Biological Monitoring During Construction.**	See above	See above
	~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).** BMPs to be included in the SWPPP shall include, but are not limited to, the following:~~ ~~• The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats.~~ ~~• If visible dust is present during construction activities, standard dust suppression techniques (e.g., water spraying) shall be used in all ground disturbance areas.~~ ~~• During construction activities, measures shall be in place to ensure that contaminants are not discharged from construction sites. The SWPPP shall define areas where hazardous materials and trash will be stored; vehicles will be parked, fueled, and serviced; and construction materials will be stored.~~ ~~• Runoff, sedimentation, and erosion shall be minimized through the use of water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures shall be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into~~	~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~	~~Verify the implementation of protection measures~~	~~During construction~~

	~~any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent properties. BMPs shall be included for helicopter landing, fueling, and servicing areas and areas where helicopters are used for construction activities. For the proposed Valley–Ivyglen Project, BMPs shall also be included for blasting.~~			

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	• ~~Equipment storage, fueling, and staging areas shall be located in upland sites away from riparian areas or other sensitive habitats. These designated areas shall be located to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously identified, these maintenance activities shall be performed at least 150 feet from all aquatic resources, or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials shall be cleaned up immediately and contaminated soils removed to approved disposal areas.~~ ~~Verification of Construction General Permit coverage approval and the approved SWPPP(s) shall be provided to the CPUC at least 30 days prior to start of construction. Updated SWPPPs shall be provided to the CPUC on request during construction.~~			
Impact BR-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment K: Wildlife Movement.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **MM BR-10: Prevent Wildlife Entrapment.** **MM BR-11: Migratory Birds and Raptors Impact Reduction Measures.** **MM BR-12: Burrowing Owl Impact Reduction Measures.**	**Project Commitment K: Wildlife Movement.**	See above	See above
Impact BR-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	**Project Commitment I: San Diego Ambrosia.** **Project Commitment K: Wildlife Movement.** **MM BR-6: Oak tree protection measures.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures.~~** **MM BR-11: Migratory Birds and Raptors Impact Reduction Measures.** **MM BR-12: Burrowing Owl Impact Reduction Measures.**	**Project Commitment I: San Diego Ambrosia.** **Project Commitment K: Wildlife Movement.** **MM BR-2: Preconstruction Surveys.** **MM BR-3: Biological Monitoring During Construction.** **MM BR-6: Oak tree protection measures.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures.~~** **MM BR-9: Invasive Plant Control Measures.** **MM BR-11: Migratory Birds and Raptors Impact Reduction Measures.** **MM BR-12: Burrowing Owl Impact Reduction Measures.** **MM BR-16: Stephens' Kangaroo Rat Take Avoidance within Core Reserve.**	See above	See above

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Cultural Resources				
Impact CR-1: Substantial adverse change in the significance of an historical or archaeological resource.	**Project Commitment B: Worker Environmental Awareness Plan.**	**Project Commitment B: Worker Environmental Awareness Plan.**	See above	See above
	MM CR-1a: Ensure preconstruction survey coverage of all work areas and staging areas. Prior to construction, the applicant shall compare the limits of the work areas and staging areas to project maps that show where areas have been previously surveyed for cultural resources at the Intensive Cultural Resources Inventory level. The applicant shall verify the proposed work areas and staging areas have been surveyed at the Intensive Cultural Resources Inventory level. An Intensive Cultural Resources Inventory level of survey is defined here as consisting of pedestrian surveys with transects spaced no farther apart than 15 meters except where field conditions such as exceptionally dense vegetation or steep slopes make walking transects difficult. In order to rely upon a prior survey for a work area, all areas that can be reasonably covered by transect surveys within such work area shall have been surveyed. If such a prior survey has been completed in the proposed work area or staging area, work can commence as follows: • If no known resources are located in the work area or staging area, work or staging can proceed in the area. Previously unknown resources that are discovered during work activities shall be subject to MM CR-1b. • If known resources are located in the work area or staging area, they must be ~~avoided~~ handled pursuant to MM CR-1b. Previously unknown resources that are discovered during work activities shall be subject to MM CR-1b. If such a prior survey has not been completed in the proposed work area or staging area, then work may not commence until an Intensive Cultural Resources Inventory has been completed by a CPUC-approved archaeologist or cultural resources specialist and reviewed and approved by the CPUC. If a resource is found during the survey, the applicant shall adhere to MM CR-1b procedures for unanticipated resources.	**MM CR-1a: Ensure preconstruction survey coverage of all work areas and staging areas.**	Verify completion of survey	Prior to construction
	MM CR-1b: Avoid impacts to known and undiscovered historic resources and unique archaeological resources (except for site P33-000714). SCE shall prepare a Cultural Resources Monitoring and Treatment Plan (CRMTP) for known and unknown resources that are eligible or potentially eligible for the California Register or are unique archaeological resources, except P33-000714, which is subject to MM CR-6. The CRMTP shall be reviewed and approved by the CPUC prior to the start of construction. To implement MM CR-1b SCE shall: • Retain a qualified archaeologist, who shall prepare the CRMTP, oversee archaeological and Native American monitors, evaluate discoveries, and prepare Evaluation and Data Recovery Plans and subsequent reports. This archaeologist shall, at the minimum, meet the Secretary of Interior's Professional Qualifications Standards for archaeology and be approved by the CPUC. • Prepare the CRMTP, which shall include the following. - Mapping. The CRMPT shall map all known California Register eligible or potentially eligible resources in and within 100 feet of work areas. Maps shall be updated as necessary to incorporate any new information obtained pursuant to MM CR-1a.	**MM CR-1b: Avoid impacts to known and undiscovered historic resources and unique archaeological resources (except for site P33-000714).**	Verify the preparation and implementation of cultural resources monitoring and treatment plan	Prior to and during construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	- Environmentally Sensitive Areas (ESA) Delineation. The CRMTP should describe how California Register eligible or potentially eligible resources will be delineated and avoided as ESAs during construction. ESAs containing cultural resources shall not be identified on the ground or on maps to be used by anyone other than the qualified archaeologist, Native American monitors, cultural resource monitors, or other cultural resource professionals~~, as being cultural resources~~. They shall be labeled on maps and with signage in the field as "environmentally sensitive areas." The ~~sole~~ preferred method of mitigation in the CRMTP for known resources shall be total avoidance of the resource (preservation in place), per CEQA Guidelines section 15126.4(b)(3)(A). The preferred method of mitigation in the CRMTP for unanticipated resources shall be total avoidance (preservation in place). If avoidance is determined to be infeasible, the applicant shall prepare a Data Recovery Plan. - Unanticipated resource discovery. The CRMPT shall contain a description of procedures to be used if unanticipated cultural resources are discovered during construction. The CRMPT shall require that work shall be temporarily halted within 100 feet or to the extent possible to avoid impacting ~~of~~ the resource, appropriate temporary protective barriers shall be installed along with signage identifying the area only as an "environmentally sensitive area" and forbidding entry into the area by all but authorized personnel, and the qualified archaeologist and the CPUC shall be notified. The preferred method of mitigation in the CRMTP shall be total avoidance of the resource (preservation in place), per CEQA Guidelines section 15126.4(b)(3)(A). If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the qualified archaeologist shall then follow the procedures delineated for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on California Department of Parks and Recreation 523 forms and filed at the Eastern Information Center. - Determination if a resource is an historical resource. The qualified archaeologist, in consultation with the CPUC, shall determine if there is a potential for the resource to be an historical resource. If there is no potential for the resource to qualify as an historical resource, work shall resume after CPUC concurrence. The CRMTP shall include a framework for evaluating cultural resources. If there is a potential for the resource to be an historic resource, the qualified archaeologist shall prepare an Evaluation Plan. - Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the historic resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan should describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an ~~historic~~ historical resource. If the discovery is not found to be an ~~historic~~ historical resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an ~~historic~~ historical resource, SCE shall prepare a Data Recovery Plan.			

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	- Data Recovery Plan. Data recovery plans for ~~historic~~ historical resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section 21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods, samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it an ~~historic~~ historical resource, and reporting procedure. This plan shall be submitted to the CPUC for review and approval. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared. - Data Recovery Field Memo. Following implementation of the Data Recovery Plan, the Data Recovery Field Memo shall be prepared. The Data Recovery Field Memo shall briefly describe the data recovery procedures in the field and summarize (at a field catalog level) the materials recovery. The Data Recovery Field Memo shall also identify the number and kind of samples recovered that are appropriate for special analyses, including radiocarbon dating, obsidian sourcing, pollen analysis, microbotanical analysis, and others, as applicable. The Data Recovery Field Memo shall be submitted to CPUC for review and approval. Once the Data Recovery Field Memo has been approved, protective barriers may be removed, and work may proceed in the area of the discovery. A Data Recovery Report shall then be prepared. - Data Recovery Report. Within 90 days of submittal of the Data Recovery Field Memo, a Data Recovery Report shall be prepared presenting the results of the data recovery program, including a description of field methods, location and size of excavation units, analysis of materials recovered (including results of any special analyses conducted), and conclusions drawn from the work. The Data Recovery Report shall also indicate where artifacts, samples, and documentation resulting from the data recovery program will be curated. The CRMPT shall specify that the curation facility meets the requirements of 36 CFR 79. The Data Recovery Report shall be submitted to the CPUC for review and approval. Once approved, the Data Recovery Report shall be filed with the Eastern Information Center. All impacted known resources and all unanticipated resources shall be recorded on California Department of Parks and Recreation 523 forms and filed at the Eastern Information Center with the Data Recovery Report. - The CRMTP shall include a summary of the California laws regarding the discovery of human remains, including: CEQA Guidelines section 15064.5(e); PRC sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code section 7050.5. In addition, the plan shall include the contact information for the Riverside County Medical Examiner.			
	MM CR-2: Monitor ground disturbing activities (includes Native American monitoring). Archaeological monitoring shall be required for all new ground disturbing activities within Alberhill Substation, new access road construction and near prehistoric ESAs ~~areas with moderate to high archaeological sensitivity~~. Spot check monitoring of areas with moderate to high sensitivity will be defined in the CRMTP and instituted appropriately during construction. The archaeological monitor(s) shall be approved by CPUC staff prior to the start of construction. If any cultural resources are discovered, the archaeological monitor has the authority to stop ground-disturbing activities in the immediate area of the discovery. The process outlined in the CRMTP required under MM CR-1b shall then be followed.	**MM CR-2: Monitor ground disturbing activities (includes Native American monitoring).**	Verify monitoring of ground disturbing activities	During construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	Native American monitoring shall be required for ground-disturbing activities and all work at P33-000714, if requested by interested Native American tribes and subject to the conditions outlined in this mitigation measure. SCE shall consult with Native American tribes that have requested involvement (including Pechanga and Soboba) to determine where Native American monitoring is required. SCE shall document consultation efforts that show queries to the NAHC and tribes on the NAHC contact list regarding culturally sensitive sites and shall provide this documentation to the CPUC for review and approval prior to any ground-disturbing activities and prior to work at resource P33-000714. Native American monitoring shall be subject to the following conditions: • Tribes requesting presence at construction or excavation activities shall be given 3~~0~~ days advance notice and shall be provided the opportunity to monitor construction activities as requested in consultation with SCE subject to the terms of this mitigation measure. ~~The applicant shall make a good-faith best effort to schedule construction when a monitor is available.~~ • Attendance by Native American monitors during these activities is ultimately at the discretion of the Tribe and the absence of a Native American monitor shall not delay work if the Native American tribe has been given 30 days advance notice. Documentation of consultation activities shall be included in the monitoring plan. The Native American monitors shall have the ability to temporarily halt work or redirect grading from the immediate vicinity of a potential unanticipated archaeological find that may require recordation and evaluation after consulting with the archaeological monitor. The archaeological monitor shall ~~be notified immediately to~~ determine the procedure to follow per MM CR-1b.			
	~~**MM CR-3: Follow historic resource and unique archaeological resource discovery protocol.** In the case that a previously unknown resource is discovered during construction activities, the CPUC-approved archaeologist shall determine whether the resource is an historical resource as defined in CEQA Guidelines section 15064.5(a) or a unique archaeological resource as defined in PRC section 21083.2(g). Work can recommence if the resource is determined to be neither. Work shall not be allowed within 150 feet of the resource if the resource meets the criteria for either a historic or unique archaeological resource. The archaeologist shall then consult with the CPUC and adhere to the CRMPT (MM CR-1b) to determine the course of action required to prevent a substantial adverse change to an historical resource or a significant effect on a unique archaeological resource.~~	~~**MM CR-3: Follow historic resource and unique archaeological resource discovery protocol.**~~	~~Verify implementation of resource discovery protocol~~	~~During construction~~
	MM CR-6: Avoid impacts to contributing elements of P33-000714. All activities within the site boundaries of P33-000714 shall be in accordance with SHPO's concurrence letter, sent to SCE on October 7, 2014. Access road construction shall occur only as described in SCE's letter to the SHPO for concurrence. No contributing elements of P33-000714 shall be impacted during construction, operation, and maintenance activities. An ESA shall be established around contributing elements during construction to prevent access by construction crews. Archaeological monitoring shall be required for construction activities within the boundaries of P33-000714. Archaeological monitoring shall be required for maintenance activities within the boundaries of P33-000714 unless the activities involve only driving on established access roads. The archaeological monitor shall have the authority to stop work in the case of an unanticipated resource. In the case of an unanticipated resource, the process outlined in MM CR-1b shall be implemented. In addition, eucalyptus trees shall not be uprooted at site P-33-000714 but shall be removed by a method that minimizes ground disturbance, such as cutting down the tree and grinding the stump to ground level with a stump grinder.		Verify avoidance of cultural resource	During construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Impact CR-2: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	**MM CR-4: Monitor Paleontologically Sensitive Areas.** SCE shall retain a qualified paleontologist to monitor ground-disturbing activities (except drilling activities) in paleontologically sensitive areas as defined in the Paleontological Resource Monitoring Plan. The qualified paleontologist shall prepare a brief Paleontological Resource Monitoring Plan that includes methods of paleontological monitoring and includes construction maps delineating areas of ground disturbance that shall be monitored for paleontological resources. These shall include areas where: • There is a high or undetermined paleontological sensitivity. • There is a potential for fossils to occur at a level shallow enough to be adversely affected by project activities. Areas where fossils would likely occur include but are not limited to the Silverado Formation ~~Foundation~~. Areas where fossils are not reasonably likely to be discovered include areas of igneous substrate, such as the Estelle Mountain volcanic rock. Qualifications for proposed paleontological monitors shall be submitted to the CPUC for review and approval. Only CPUC-approved paleontological monitors shall serve on this project. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential finds in order to begin implementation of MM CR-5. A reduction in monitoring activities will be determined based on field observations and in coordination with SCE and CPUC.	**MM CR-4: Monitor Paleontologically Sensitive Areas.**	Verify monitoring of ground disturbing activities	During construction
	MM CR-5: Follow Paleontological Resource Discovery Protocol. In the case that a previously unknown paleontological resource is discovered during construction activities, all work within 15 meters of the resource shall be stopped, and the CPUC-approved paleontologist shall determine whether the resource can be avoided. If the resource cannot be avoided, the paleontologist shall determine whether the resource is unique under Part V of CEQA Guidelines Appendix G. A paleontological resource shall be considered unique if it meets the definition of a significant paleontological resource under the 2010 Society of Vertebrate Paleontology *Standard Procedures for the Assessment of Adverse Impacts to Paleontological Resources* definition: Significant paleontological resources are fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, ~~phylogentic~~, phylogenetic paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years) (Society of Vertebrate Paleontology 2010). Substantiation of the uniqueness conclusion shall be provided to the CPUC for review and approval. Work shall be allowed to continue if the resource is not unique. If the resource is unique, then work shall remain stopped until the approved paleontologist has consulted with SCE and the CPUC and a feasible approach, approved by the CPUC, has been developed that will prevent destruction of the resource by site protection or recovery. Methods of recovery, testing, and evaluation shall adhere to current professional standards for recovery, preparation, identification, analysis, and curation, such as the 2010 Society of Vertebrate Paleontology *Standard Procedures for the Assessment of Adverse Impacts to Paleontological Resources*. Work can commence following recovery and CPUC approval.	**MM CR-5: Follow Paleontological Resource Discovery Protocol.**	Verify implementation of resource discovery protocol	During construction
Impact CR-3: Disturb any human remains, including those interred outside of formal cemeteries.	**MM-CR-7: Follow Necessary Procedures for Unanticipated Discovery of Human Remains.** The CRMTP (MM CR-1b) shall include a summary of the applicable laws concerning human remains, including: CEQA Guidelines section 15064.5(e); PRC sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code section 7050.5. These laws require Native American consultation for Native American burial sites. The CPUC shall be notified immediately after the legally-mandated notification of the county medical examiner if any human remains are encountered during construction. Workers shall be trained in procedures to follow in case of unanticipated discovery of human remains as	**MM-CR-7: Follow Necessary Procedures for Unanticipated Discovery of Human Remains.**	Verify implementation of resource discovery protocol	During construction

	part of the Worker Environmental Awareness Plan.			

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Geology, Soils, and Mineral Resources				
Impact GE-1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides.	**Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** Prior to the start of construction, the applicant shall conduct geotechnical and hydrologic studies and field investigations of the Alberhill Substation site, 500-kV transmission line routes, all 115-kV subtransmission line routes, and all telecommunications line routes. The studies shall include an evaluation of the depth to the water table, liquefaction potential, physical properties of subsurface soils, soil resistivity, and slope stability (landslide susceptibility). The studies shall include soil boring and laboratory testing to determine the engineering properties of soils, would characterize soils and underlying bedrock units, characterize groundwater conditions, and evaluate faulting and seismicity risk. Soil samples shall be collected and analyzed for common contaminants and the presence of hazardous materials. If chemicals are detected in the soil samples at concentrations above acceptable ~~action~~ levels, the applicant shall avoid the above threshold ~~contaminated~~ soil or work with the property owner to remove the above threshold ~~contaminated~~ soil. The results of this study shall be applied to final engineering designs for the projects. The information collected shall be used to determine final tubular steel pole foundation designs. In addition, the applicant shall design Alberhill Substation consistent with the applicable federal, states, and local codes including the Institute of Electrical and Electronic Engineers 693 Standard, *Recommended Practices for Seismic Design of Substations*.	**Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.**	Verify completion of study and implementation of recommendations	Prior to and during construction
	~~**MM GE-1: Seismic Safety Training.** The applicant shall ensure that all construction personnel adhere to the applicant's worker safety guidelines and policies to avoid additional adverse effects to health and safety in the event of an earthquake during construction. These guidelines and policies shall be communicated to construction personnel during a pre-construction Worker Environmental Awareness Program (to be implemented under Project Commitment B), which shall highlight seismic activity as a potential hazard during onsite construction.~~	~~**MM GE-1: Seismic Safety Training.**~~	~~Verify completion of training~~	~~Prior to and during construction~~
Impact GE-2: Result in substantial soil erosion or the loss of topsoil.	**Project Commitment D: Habitat Restoration and Revegetation Plan.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~	**Project Commitment A: Landscaping and Irrigation Plan.** **Project Commitment D: Habitat Restoration and Revegetation Plan.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~	See above	See above
	Project Commitment E: Grading Plan. SCE shall consult with ~~The~~ Riverside County ~~Flood Control and Water Conservation District shall be consulted~~ regarding grading the plans for construction and operation of the proposed projects. ~~The County will review and approved final grading (and drainage) plans prior to start of construction.~~ Storm water improvements ~~sections of the plans~~ shall be designed to maintain a discharge of storm water runoff consistent with the characteristics of storm water runoff presently discharged from project areas including the Alberhill Substation site. Measures included in the plans shall minimize adverse effects on existing or planned storm water drainage systems. Ground surface improvements installed at the site pursuant to the plans shall be designed to minimize discharge of materials that would contribute to a violation of water quality standards or waste discharge requirements. The final grading design shall include features that would minimize erosion and siltation both onsite and offsite. In addition, the final grading (and drainage) design shall be based on the results of the geotechnical study and soil evaluation for the substation site (Project Commitment F).	**Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects.**	Verify preparation and implementation of grading plan	Prior to and during construction
Impact GE-3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse.	**Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.**	**Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.**	See above	See above
Impact GE-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code	**Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.**	**Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.**	See above	See above

(1994), creating substantial risks to life or property.				

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Impact GE-5: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.		**Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.**	See above	See above
Greenhouse Gases				
No measures apply.				
Hazards and Hazardous Materials				
Impact HZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~ **MM WQ-1: Blasting Plan and Best Management Practices.**	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~	See above	See above
	~~**MM HZ-1: Hazardous Materials Management.** Prior to construction, the applicant shall prepare a hazardous materials management, handling, transport, storage, disposal, and emergency response plan for project construction, operation, and maintenance, following the requirements of applicable federal, state, and local regulations. Components of the plan shall include the following if not otherwise implemented prior to construction in accordance with plans required by the Riverside County Hazardous Materials Management Division: 1. Train project personnel in appropriate work practices including spill prevention and response measures. 2. Contain all hazardous materials at work sites and properly dispose of all such materials. a. Hazardous materials shall be stored on pallets within fenced and secured areas and protected from exposure to weather. b. Fuels and lubricants shall be stored only at designated staging areas. 3. Maintain hazardous material spill kits for small spills at all active work sites and staging areas. 4. Thoroughly clean up all spills as soon as they occur. 5. Store sorbent and barrier materials at the Alberhill Substation site and all construction staging areas, including staging areas used during activities for decommissioning of the Alberhill Substation. Sorbent and barrier materials shall be used to contain runoff from contaminated areas and from accidental releases of oil or other potentially hazardous materials to prevent the runoff from entering the storm drainage system. 6. Perform all routine equipment maintenance at a shop or at the staging area and recover and dispose of wastes in an appropriate manner. 7. Monitor and remove any vehicles with chronic or continuous leaks from use and complete repairs before returning them to operation. 8. Store shovels and drums at the staging area. If small quantities of soil become contaminated, use shovels to collect the soil and store in drums before proper offsite disposal. Large quantities of contaminated soil may be collected using heavy equipment and stored in drums or other suitable containers prior to disposal. Should contamination occur adjacent to staging areas because of runoff, shovels and/or heavy equipment shall be used to collect the contaminated material.~~	~~**MM HZ-1: Hazardous Materials Management.**~~	~~Verify preparation and implementation of hazard materials management plan~~	~~Prior to and during construction~~

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	~~The applicant shall submit the plan to CPUC for review and approval at least 60 days prior to the start of construction. The applicant shall implement the plan during construction, operation, and maintenance of the projects.~~			
	MM HZ-2: Contaminated Soil/Groundwater Contingency Plan. Prior to the start of construction, to the extent not otherwise included within plans required by the Riverside County Hazardous Materials Management Division, the applicant shall develop a Contaminated Soil/Groundwater Contingency Plan to address the unearthing or exposure of buried hazardous materials or contamination or contaminated groundwater during construction of the projects. The Plan shall detail steps that the applicant or its contractor will take to prevent the spread of contamination, the sampling necessary if contamination is discovered, and remedial action to be taken. The Plan, at minimum, shall include the following: 1. Contact information for federal, regional, and local agencies, the applicant's environmental coordinator(s) responsible for the cleanup of contaminated soil or groundwater, and licensed disposal facilities and haulers. 2. Procedures to minimize environmental impacts in the event that hazardous soils, contaminated groundwater, or other hazardous materials are encountered during construction including stopping work; securing and marking the contaminated area; preventing the spread of contamination; testing; primary, secondary, and final cleanup procedures; and proper disposal in accordance with applicable laws and regulations. 3. Training requirements for construction workers performing excavation activities including training on types of contamination including common contaminants (e.g., petroleum hydrocarbons, lead, mercury, and metals, asbestos, acetone, nitrate, semi-volatile organic compounds and volatile organic compounds (benzene), polychlorinated biphenyls, sanitary waste, and pesticides) and *hazardous materials* (as defined by the California Health and Safety Code) and identifying potentially hazardous contamination (e.g., stained or discolored soil and odor). ~~4. Dewatering procedures including storage, testing, treatment, and disposal requirements and dewatering BMPs set forth in the applicant's Storm Water Pollution Prevention Plan.~~ The applicant shall submit the plan to CPUC for review and approval at least 60 days prior to the start of construction. The applicant shall implement the plan during construction of the projects.	**MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.**	Verify preparation and implementation of contaminated soil/groundwater contingency plan	Prior to and during construction
Impact HZ-2: 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.	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** **~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~** **~~MM HZ-1: Hazardous Materials Management.~~** **MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.** **MM WQ-1: Blasting Plan and Best Management Practices.**	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** **~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~** **~~MM HZ-1: Hazardous Materials Management.~~** **MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.**	See above	See above

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	~~**MM HZ-3: DigAlert.** As part of the siting and engineering for the projects, the applicant shall precisely locate all underground natural gas lines that may be impacted. Prior to finalizing the engineering design, the applicant shall contact the Underground Service Alert of Southern California (DigAlert) to identify the exact locations of gas pipelines within the project area. In addition, prior to construction the applicant shall contact affected private landowners to determine if septic systems and associated leach fields as well as other underground facilities may be impacted by construction of the projects. Final engineering plans for the projects shall be designed to avoid damage to underground facilities, both public and private. The applicant shall immediately notify by telephone the owner of underground facilities that may have been damaged or dislocated during construction of the projects.~~	~~**MM HZ-3: DigAlert.**~~	~~Verify utilization of digalert~~	~~During construction~~
Impact HZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school.	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~ ~~**MM HZ-1: Hazardous Materials Management.**~~ **MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.** ~~**MM HZ-3: DigAlert.**~~ **MM WQ-1: Blasting Plan and Best Management Practices.**	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~ ~~**MM HZ-1: Hazardous Materials Management.**~~ **MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.** ~~**MM HZ-3: DigAlert.**~~	See above	See above
Impact HZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	**MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.**	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards. MM HZ-2: Contaminated Soil/Groundwater Contingency Plan.**	**See above**	**See above**
Impact HZ-8: 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.		**Project Commitment A: Landscaping and Irrigation Plan.**	**See above**	**See above**
	MM HZ-4: Fire Control and Emergency Response. The applicant, in consultation with its contractors, shall develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies (e.g., flooding) during construction~~, operation, and maintenance~~ of the projects. The plans and a record of contact and coordination with the fire departments with jurisdiction over each worksite shall be submitted to the CPUC for review and approval prior to start of construction. The plans shall describe fire prevention and response practices that the applicant and its contractors will implement to minimize the risk of fire, and in the event of fire or other emergencies, provide for immediate response. The site-specific plans shall specify that the applicant or its contractors will furnish supervision, labor, tools, equipment, and materials for the prevention of fire and extinguishing and controlling the spread of fires started as a result of project activities.	**MM HZ-4: Fire Control and Emergency Response.**	Verify preparation and implementation of fire control and emergency response plan	Prior to and during construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	During Construction: • - The applicant or its designee ~~contractors~~ shall designate ~~assign~~ a full time Fire Risk Manager~~s~~ who will be present ~~at each worksite~~ during construction activities, whose sole responsibility will be to monitor the contractor's fire-prevention activities, and who will have full authority to stop construction as needed to prevent fire hazards. The Fire Risk Manager~~s~~ shall: - Serve as liaisons to fire departments and act as a point of contact for fire departments in the event of fire or other emergency; - Manage the prevention, detection, control, and extinguishing of fires set accidentally as a result of construction activity; - Review site-specific fire control and emergency response plans ~~with construction personnel~~ prior to starting work ~~at each project area~~; - Ensure that ~~all~~ construction personnel are trained in fire safety measures relevant to their responsibilities. At minimum, construction personnel shall be trained in fire and emergency reporting and incipient-stage fire prevention, control, and extinguishing (i.e., the fire can be controlled or extinguished by portable fire extinguishers, small hose systems, or portable water supplies without the need for protective clothing or breathing apparatus). Each member of the construction workforce shall be trained and equipped to extinguish small fires; - Be equipped with radio and cellular telephone access for the duration of each work day; - Ensure that all construction personnel are provided with operational radio and cellular telephone access at each worksite to allow for immediate reporting of fires or other emergencies and ensure that communication pathways and equipment are tested and confirmed operational each day prior to initiating construction activities at each worksite; and - Maintain an updated key personnel and emergency services contact (telephone and email) list onsite and available to construction personnel. • Construction workers shall immediately report all fires to the nearest Fire Risk Manager. During All Project Phases: • Equipment installed and maintained as part of the project shall include: ~~- Spark arresters that are in good working order and meet applicable regulatory standards for all internal combustion engines (both stationary and mobile);~~ -Fire suppression equipment with each construction crew ~~on all motorized vehicles~~ that includes, at minimum, one shovel and one pressurized chemical fire extinguisher - A fire extinguisher capable of extinguishing any equipment-caused fire on all heavy construction equipment; and - Portable communication devices (e.g., radios or cellular telephones) and communication protocols for project workers to coordinate with local agencies and emergency personnel in the event of fire or other emergencies. - Measures to be undertaken by the applicant or its contractors shall include: - Prohibiting smoking during the operation of light or heavy construction equipment; in wildland areas; and within 30 feet of any area where combustible materials (e.g., fuels, gases, and solvents) are stored; - Limiting smoking to paved areas or areas designated for smoking that have been cleared of all vegetation;			

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	- Posting no-smoking signs and fire rules on project bulletin boards, at contractor field offices, and in other areas visible to workers during fire season; - Maintaining all worksites in an orderly, safe, and clean manner. Maintaining staging areas and parking areas free of extraneous flammable materials. Removing all oily rags and used oil filters from worksites; - Confining hot-work activities (e.g., welding, brazing, soldering, grinding, and arc cutting) to cleared areas with a minimum 10-foot clearance radius measured from place of hot-work activity; - Ensuring an appropriate fire extinguisher is present before initiating each hot-work activity; - Preventing vehicles with hot exhaust manifolds from idling on roads with combustible vegetation under the vehicles; - Ensuring all Blasting Plan (MM WQ-1) BMPs are followed, e.g., pre-blast and post-blast inspections; ~~- Notifying the fire department with jurisdiction over the worksite in advance of all planned burning activities (e.g., to clear vegetation). Special care shall be taken to prevent damage to adjacent structures, trees, and vegetation during planned burning activities; and~~ ~~- Any additional fire prevention and detection measures to lower the risk of wildland fires.~~ • Measures to be undertaken by the applicant or its contractors for days when the National Weather Service issues a Red Flag Warning for a project area shall include: - Abiding by all restrictions and requirements that may be imposed by fire departments during Red Flag Warning periods (e.g., parking restrictions; road closures; and work activity and equipment use restrictions and requirements); and - Prohibiting smoking at all worksites.			
Hydrology and Water Quality				
Impact WQ-1: Violate any water quality standards or waste discharge requirements.	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment D: Habitat Restoration and Revegetation Plan** **Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects.** **~~MM HZ-1: Hazardous Materials Management.~~** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~**	**Project Commitment B: Worker Environmental Awareness Plan.** **Project Commitment D: Habitat Restoration and Revegetation Plan** **Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects.** **~~MM HZ-1: Hazardous Materials Management.~~** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **~~MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).~~**	See above	See above

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	MM WQ-1: Blasting Plan and Best Management Practices. The applicant or its contractors shall prepare and implement a detailed Blasting Plan for the Valley–Ivyglen Project. This plan shall identify the scope of blasting, all blasting locations, the proximity of facilities to each blasting location, and the types and estimated amounts of blasting agent required for each blasting location. The plan shall be submitted to and approved by the CPUC prior to start of ~~construction~~ blasting and the plan shall be resubmitted for approval if changes are required. The intent of the plan is to: • Reduce the potential for increased turbidity in groundwater and surface water; • Prevent debris from entering drainages, waters of the state, and waters of the United States; and Avoid mishandling of hazardous materials associated with blasting. BMPs shall include, but are not limited to: ~~• Monitor the entire blasting process by licensed blasting personnel and the use of licensed blasters with qualifications that meet all federal, state, and local requirements;~~ • Conduct pre-blast surveys and inspections and conduct post-blast surveys and inspections for blast performance and fire hazards (e.g., undetonated explosive agent or smoldering materials); • Remove and manage muck piles (blast debris) to prevent water contamination; • Place matting or padding to contain flyrock and add an appropriate blasting agent to reduce flyrock near sensitive biological and cultural resources; • Select an explosive with appropriate water resistance for the blast site to reduce impacts on groundwater; • Clean loading equipment in an area where waste can be contained and kept away from drainages and other surface water; • Manage muck piles to avoid contact with stormwater and remove them from the project area as soon as reasonably feasible; and • Handle hazardous materials located during blasting in accordance with MM HZ-2.	**MM WQ-1: Blasting Plan and Best Management Practices.**	Verify preparation and implementation of blasting plan	Prior to and during construction
	~~**MM WQ-2: Drainage crossing procedures and practices.** Crossing of drainages shall be conducted when the drainage is dry. A qualified aquatic monitor shall inspect the drainage crossing after precipitation and before use to determine whether the drainage is dry or needs to be avoided (e.g., through placement of a temporary bridge) to allow it to dry out and avoid impacts. If a temporary or permanent bridge is required in order to avoid impacts, the following measures shall be implemented: • Any temporary or permanent bridges shall be installed to avoid placement below the Ordinary High Water Mark of the drainage as feasible. • Prior to construction, the applicant shall obtain all necessary permits and approvals from the USACE, Santa Ana RWQCB, and CDFW.~~	~~**MM WQ-2: Drainage crossing procedures and practices.**~~	~~Verify implementation drainage crossing procedures~~	~~During construction~~

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	MM WQ-3: Design of access roads with erosion control measures. Access roads shall be designed and built to minimize ~~avoid~~ adverse erosion and siltation impacts, where required by local jurisdictions. Measures to be incorporated into unpaved roadway design and construction shall include, but are not limited to: • Design road with insloping, outsloping, or crowning; • Incorporate rolling dips; • Incorporate water bars; • Avoid overgrading; and • Build ditches.	**MM WQ-3: Design of access roads with erosion control measures.**	Verify erosion minimization measures	Prior to and during construction
	MM WQ-4: Disposal of groundwater from dewatering excavations. Groundwater extracted as a result of dewatering during construction shall not be discharged to waters of the state without written authorization from the Santa Ana RWQCB. Extracted groundwater shall be disposed of on-site in one of the following manners: • Discharged to an upland area where it will not enter waters of the state but would instead evaporate or infiltrate; • Used for dust control; • Used for irrigation water; • Used for other construction needs; or • Disposed of at a licensed facility if water is suspected of being contaminated or degraded.	**MM WQ-4: Disposal of groundwater from dewatering excavations.**	Verify disposal of dewatered groundwater	During construction
Impact WQ-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	**Project Commitment D: Habitat Restoration and Revegetation Plan** **Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~ ~~**MM WQ-2: Drainage crossing procedures and practices.**~~ **MM WQ-3: Design of access roads with erosion control measures.**	**Project Commitment A: Landscaping and Irrigation Plan.** **Project Commitment D: Habitat Restoration and Revegetation Plan** **Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~ ~~**MM WQ-2: Drainage crossing procedures and practices.**~~ **MM WQ-3: Design of access roads with erosion control measures.**	See above	See above
		MM WQ-7: Design detention basin to adequate size. SCE shall design the detention basin on the Alberhill Substation site in accordance with the Riverside County Stormwater Quality Best Management Practice Design Handbook (Riverside County Flood Control and Water Conservation District 2006).	Verify design adequacy of detention basin	Prior to construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Impact WQ-4: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	**MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **MM WQ-3: Design of access roads with erosion control measures.**	**MM WQ-3: Design of access roads with erosion control measures.** **MM WQ-7: Design detention basin to adequate size.**	See above	See above
	MM WQ-5: Maintain capacity and connectivity of drainages. SCE shall design and construct access roads to maintain the capacity and connection of drainages that are adjacent to and crossed by access roads for the proposed projects. Methods to maintain drainage characteristics include installation of culverts or designing low water crossings. Prior to any alteration of a drainage, including grading or the placement of fill material or culverts in a drainage, SCE shall obtain any permits required by the USACE, Santa Ana RWQCB, and CDFW.	**MM WQ-5: Maintain capacity and connectivity of drainages.**	Verify implementation of drainage protection measures	During construction
	MM WQ-6: Avoid impeding MDP implementation and function. Prior to construction, SCE shall consult with ~~provide final engineering designs to~~ the RCFCWCD for project elements located within MDP areas. Construction within ~~MPD~~ MDP areas shall not be allowed to proceed until SCE consults with ~~obtains written confirmation from~~ the RCFCWCD about whether ~~that~~ project elements located in these areas would not impede the function of flood control facilities and would not prevent implementation of the MDP.	**MM WQ-6: Avoid impeding of MDP implementation and function.**	Verify avoidance of MDP areas	During construction
Impact WQ-5: Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.		**MM WQ-7: Design detention basin to adequate size.**	See above	See above
Impact WQ-7: Place within a 100-year flood hazard area structures which would impede or redirect flood flows.	**MM WQ-5: Maintain capacity and connectivity of drainages.**		See above	See above
Impact WQ-8: Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.	**MM HZ-4: Fire Control and Emergency Response.**	**MM HZ-4: Fire Control and Emergency Response.**	See above	See above
Impact WQ-9: Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow	**Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.**		See above	See above

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Land Use and Planning				
Impact LU-2: Conflict with any applicable habitat conservation plan or natural community conservation plan.	**MM BR-6: Oak tree protection measures.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures.~~** **MM BR-11: Migratory Birds and Raptors Impact Reduction Measures.** **MM BR-12: Burrowing Owl Impact Reduction Measures.**	**MM BR-2: Preconstruction Surveys.** **MM BR-3: Biological Monitoring During Construction.** **MM BR-6: Oak tree protection measures.** **MM BR-7: Habitat Restoration and Revegetation Plan Requirements.** **~~MM BR-8: Special Status Plant Avoidance and Mitigation Measures.~~** **MM BR-9: Invasive Plant Control Measures.** **MM BR-11: Migratory Birds and Raptors Impact Reduction Measures.** **MM BR-12: Burrowing Owl Impact Reduction Measures.** **MM BR-16: Stephens' Kangaroo Rat Take Avoidance within Core Reserve.**	See above	See above
Noise				
Impact NV-1 : Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	**Project Commitment H: Noise Control.**	**Project Commitment H: Noise Control.**		
	MM NV-1 Construction ~~and Maintenance~~ Noise Reduction Measures. Prior the start of construction, the applicant shall prepare and submit to the CPUC a Noise Control Plan, which shall detail the frequency, location, and methodology for noise monitoring prior to and during the proposed construction activities within the Cities of Lake Elsinore and Perris. The Noise Control Plan will shall also detail the actions and procedures that the applicant will implement to avoid significant impacts from temporary ambient noise increases. Measures in the Noise Control Plan shall include, but not be limited to the following: ~~• Limiting the timeframes for heavy-duty equipment usage to less than 4 hours per day,~~ • Reducing the number of pieces of equipment concurrently operating near sensitive receptors, as feasible. ~~• Using construction equipment specifically designed for low-noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines). Electric engines have been reported to have lower noise levels than internal combustion engines.~~ ~~• Compensating residents for temporary relocation during high-noise activities that cannot be reduced to less than 75 dBA~~ ~~• If noise from construction and maintenance equipment will result in noise levels in excess of 75 dBA at the closest residential receptor's property line, the applicant shall implement additional noise reduction measures, including the use of portable noise absorption screens surrounding the specific work area and a staggered construction work practice as needed, to ensure that noise levels in areas close to sensitive receptors are within an acceptable range (i.e., 65 to 75 dBA, to the extent technically and economically feasible).~~	**MM NV-1 Construction and Maintenance Noise Reduction Measures.**	Verify preparation and implementation of noise monitoring plan	Prior to and during construction

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	~~• The applicant shall provide a written request to the CPUC regarding any construction that will occur during the hours of 7:00 p.m. to 7:00 a.m. or on Sundays any legally proclaimed holidays. The written request shall include justification of why work must occur during these hours/days, and a detailed description of work activities and location to be performed. The applicant must receive approval from the CPUC prior to any construction work occurring during these times.~~ • The applicant shall monitor construction and maintenance noise levels in hourly equivalent averages Leq(h) before and during construction activities planned within 50 feet of noise sensitive receptors. During the project construction period, noise measurements shall be taken on a daily basis and reported to the CPUC on a monthly basis, within 15 days of the end of the monitoring period. The applicant shall submit the Noise Control Plan to the CPUC for review and approval at least 30 days prior to the start of project construction. The applicant shall comply with all requirements of the approved Noise Control Plan whenever it applies during construction and maintenance activities for the projects.			
		~~**MM NV-3 Low-Noise Substation Equipment and Noise Barriers.** The applicant shall ensure that the Alberhill Substation operational noise levels will not exceed 45 dBA 10-minute Leq at the closest sensitive receptor, as specified in Riverside County General Plan Policy N4.1. This shall be achieved either through use of low-noise substation equipment or installation of noise barriers or both. The applicant shall conduct monitoring and reporting of operational noise levels at the substation according to the specifications in the Riverside County General Plan Appendix I and the Riverside County Department of Public Health "Requirement for Determining and Mitigating Non-Transportation Noise Source Impacts to Residential Properties."~~	Verify noise level	During operation
		~~**MM NV-4 Corona Noise Reduction Insulators.** The applicant shall ensure that the Alberhill System 500-kV transmission line corona audible noise levels will not exceed 45 dBA 10-minute Leq at the closest sensitive receptor, as specified in Riverside County General Plan Policy N4.1. This shall be achieved by the use of additional insulation equipment and additional technological solutions to reduce corona noise levels during rainy and fair-weather conditions. To verify the efficiency of the corona noise reduction equipment, the applicant will measure operational noise levels at the closest sensitive residential receptors from the Alberhill Substation during three rain events during the first two rainy seasons when the substation is operating. Monitoring reports shall indicate the existing ambient noise levels and weather conditions during measurements. The applicant shall conduct noise level measurements in compliance with the County of Riverside requirements, as applicable. The applicant will submit results of the monitoring to the CPUC annually. If the monitoring reports determine that the corona noise levels exceed 45 dBA at sensitive residential receptors, the applicant will implement additional technological solutions and installation equipment and will repeat the measuring of operational noise levels at at the closest sensitive residential receptors from the Alberhill Substation during three rain events during the subsequent two rainy seasons, until the 45 dBA threshold is no longer exceeded during rain events.~~	Verify noise level	During operation

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Impact NV-2: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	**Project Commitment H: Noise Control.**		See above	See above
	MM NV-2: Blasting Vibration Control Measures. During final project design, <u>if blasting is proposed,</u> the applicant shall develop a blasting mitigation and monitoring plan to be implemented during blasting activities for the Valley-Ivyglen project. The plan shall be submitted to the CPUC for review and approval at least 30 days prior to the start of project construction. During plan development, applicant must assess distances to sensitive receptors and include blasting procedures in the plan that ensure blasting operations will be engineered safely and effectively. The plan shall include the following requirements for blasting activities : • Using blasting methods designed to reduce vibration and air overpressure; • Using pre-blast warning signals prior to detonating the blast and after detonation, conducting post-blast safety inspections; • Conducting blast monitoring for all blasting operations. A daily log shall be maintained by the blasting contractor for each blast detonated on each working day, including monitoring of ground motions, peak particle velocity, and air blast levels; • Implementing modifications to blasting procedures -- such as using different delay patterns, reducing the size of individual blasts, using shorter and/or smaller diameter blast holes, closer spacing of blast holes, reducing volume of explosives used, using protective measures (e.g., gravel or blasts mats) -- as necessary to control rock and debris that may be expelled from the blast sites and sound walls or a combination of measures in the case that blasting would result in vibration or blast levels with a PPV in excess of 2.0 inches/second or 80 VdB as measured at the closest residential receptors property line; • Limiting hours of blasting to daytime hours between 7:00 a.m. and 7:00 p.m., Monday through Saturday; • Implementing a public outreach program to provide alerts the affected public to the potential for vibrations and noise associated with blasting not less than three and not more than ten days prior to the commencement of blast activities; and • Responding to and investigating complaints.		Verify preparation and implementation of blasting mitigation and monitoring plan	Prior to and during construction
Impact NV-4: Substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project	**Project Commitment H: Noise Control.** **MM NV-1 Construction and Maintenance Noise Reduction Measures.** **MM NV-2 Blasting Vibration Control Measures.**	**Project Commitment H: Noise Control.** **MM NV-1 Construction and Maintenance Noise Reduction Measures.**	See above	See above
Population and Housing				
No measures apply				

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Public Services and Utilities				
Impact PS-1: Result in substantial adverse physical impacts on governmental facilities or from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following: (1) fire protection, (2) police protection, (3) schools, (4) parks, or (5) other public facilities.	~~**MM HZ-4: Fire Control and Emergency Response.**~~	~~**MM HZ-4: Fire Control and Emergency Response.**~~	~~See above~~	~~See above~~
Impact PS-3: Require or result in the construction of new storm water drainage facilities or expansion of existing facilities.	**Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** ~~**MM AE-6: Hillside and Natural Slope Preservation**~~ **MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~	**Project Commitment E: Grading Plan. The Riverside County Flood Control and Water Conservation District shall be consulted regarding grading plans for construction and operation of the proposed projects.** **Project Commitment F: Geotechnical Study, Soil Testing, and Seismic Design Standards.** ~~**MM AE-6: Hillside and Natural Slope Preservation**~~ **MM BR-1: Limit Construction to Designated Areas and Avoid Riparian, Aquatic, and Wetland Areas.** ~~**MM BR-15: Stormwater Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs).**~~	See above	See above
Recreation				
No measures apply				
Transportation and Traffic				
Impact TT-1: Conflict with an applicable plan, ordinance or policy establishing a measure 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.	**Project Commitment H: Noise Control**	**Project Commitment H: Noise Control**	See above	See above
	~~**MM TT-1: Traffic Management and Control Plan.** The applicant shall prepare a Traffic Management and Control Plan that shall include, at a minimum, measures to ensure that: • Traffic flow, bicycle access, and pedestrian access is not completely restricted on any roadway for longer than 15 minutes, or a detour is provided; • Emergency access is maintained at all times; and • Lane closures do not create safety hazards.~~	~~**MM TT-1: Traffic Management and Control Plan**~~	~~Verify the preparation and implementation of Traffic Management and Control Plan~~	~~Prior to and during construction~~

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
	~~In addition to measures required by agencies with jurisdictions over the project, this plan will, at a minimum:~~ ~~• Include a discussion of work hours, haul routes, work area delineation, traffic control, and flagging;~~ ~~• Identify all access and parking restriction and signage requirements;~~ ~~• Require workers to park personal vehicles at the approved staging area and take only necessary project vehicles to the work sites;~~ ~~• Lay out plans for pre-construction notifications to and a process for communication with affected residents and landowners. Advance public notification shall include posting of notices and appropriate signage regarding construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which roads/lanes and access point/driveways/parking areas would be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints;~~ ~~• Require posting of warning signs so that motorists are prepared for slow trucks;~~ ~~• Require notification of emergency service providers regarding the timing, location, and duration of construction activities.~~ ~~• Require all roads to remain passable to emergency service vehicles at all times;~~ ~~• Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow;~~ ~~• Require emergency vehicle access to be maintained at all times;~~ ~~• Encourage full use of the full roadway width that existed prior to construction during non-working hours, if possible;~~ ~~• Restrict deliveries of large equipment during peak traffic hours to the extent feasible in accordance with applicable local ordinances;~~ ~~• Ensure that traffic control is performed in accordance with final engineering plans and approved drawings attached to any permit issued;~~ ~~• When required, such as during egress of slow traffic onto public roadways, traffic shall be controlled by flaggers who shall be in constant communication with each other during flagging operations;~~ ~~• Require removal of all dirt from the roadway each day before the completion of work; and~~ ~~• Require streets to be maintained in drivable condition at all times.~~ ~~The Traffic Management and Control Plan shall be submitted to the CPUC for review and approval at least 60 days prior to the start of construction. Construction may not commence until CPUC has provided the applicant with approval of the plan.~~			

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Impact TT-2: 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	**MM TT-2: Heavy Vehicle Traffic Restrictions.** The applicant shall ~~coordinate with Caltrans and the City of Lake Elsinore to restrict~~ minimize heavy vehicle traffic for the project at the Lake Street and I-15 northbound ramp during the AM peak hour (7:00 AM to 9:00 AM) for the duration of project construction. Heavy vehicles traveling to project sites during the AM peak hour shall be diverted to the Indian Truck Trail and I-15 northbound ramp. Prior to the start of construction, the applicant shall alert truck drivers associated with the project. ~~of this restriction and shall install temporary signage on Lake Street notifying project drivers of this restriction~~. The applicant shall also ~~restrict~~ minimize construction traffic for the project at the Menifee Road and SR-74 intersection during the PM peak hour (4:00 PM to 6:00 PM). The applicant may require construction traffic to exit Staging Area ASP7 and Staging Area VIG2 prior to 4:00 PM or after 6:00 PM. Alternatively, the applicant may provide an alternative access route ~~via Case Road to the Ethanac Road and I-15 interchange~~.	**MM TT-2: Heavy Vehicle Traffic Restrictions.**	Verify the restriction of heavy vehicles	During construction
	~~**MM TT-3: Highway Closure Plan.** At least 30 days prior to initiating installation of crossings of I-15 and SR-74, the applicant shall prepare and submit to Caltrans a Highway Closure Plan as part of its Caltrans encroachment permit application. The plan shall ensure that closure or partial closure of I-15 and SR-74 are planned so as to minimize traffic disruption and other hazards to highway users (e.g., construction limited to off-peak, non-daytime hours, from 10 p.m. to 5 a.m., and signage posted prior to the closure to alert drivers of the closure in accordance with Caltrans requirements). Highway closure times will be reviewed and approved by Caltrans to minimize delay to I-15 and SR-74 traffic. The plan shall also outline suggested detours for I-15 and SR-74 traffic, including routes and signage. At least 15 days prior to initiating installation of the crossings, the applicant shall provide to the CPUC evidence of Caltrans granting the encroachment permit.~~	~~**MM TT-3: Highway Closure Plan.**~~	~~Verify preparation and implementation of highway closure plan~~	~~Prior to and during construction~~
Impact TT-3: 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	**Project Commitment G: Aircraft Flight Path Safety Provisions and Consultations.** Prior to construction, the applicant shall consult with the Federal Aviation Administration and ensure the filing of forms and associated specifications per the requirements of Federal Aviation Regulations Part 77 (Objects Affecting Navigable Airspace). The applicant shall review all recommendations and/or determinations from the FAA and mark and/or light the FAA recommended components where the applicant finds they are reasonable and feasible.	**Project Commitment G: Aircraft Flight Path Safety Provisions and Consultations.**	Verify consultation with FAA	Prior to construction
	MM TT-4: Helicopter Lift Plan. SCE's helicopter contractor shall coordinate with the FAA and obtain FAA-required approvals for helicopter operations. The applicant contractor's submittal to the FAA shall include a Helicopter Lift Plan for operations within ~~1,500~~ 500 feet of a congested area or within ~~1,500~~ 500 feet of residences in compliance with 14 CFR 133.33, which requires that flights be conducted so emergency landings and release of external load can be accomplished without safety risks to people or property when operating over congested areas. The Helicopter Lift Plan shall include the following measures, to the extent feasible: • Designation of a responsible party for equipment inspections; • Communication procedures; • Identification of exclusion zones where pedestrians will not be allowed; and • Training of personnel in safety requirements and procedures. The Helicopter Lift Plan and evidence of FAA approval of the plan shall be provided to the CPUC prior to commencing helicopter operations.	**MM TT-4: Helicopter Lift Plan.**	Verify preparation and implementation of helicopter lift plan	Prior to and during construction
	~~**MM TT-5. FAA No-Hazard Determination.** SCE shall obtain a determination of no hazard from the FAA when notification under 14 CFR 77 is required for: • Use of construction equipment, such as cranes; or • Installation of structures, such as lattice steel towers.~~	**MM TT-5. FAA No-Hazard Determination**	Verify determinations from FAA	Prior to construction

	~~SCE shall provide documentation of the FAA finding to the CPUC prior to the use of equipment or installation of structures that require notification under 14 CFR 77.~~			

Table 9-1 Draft Mitigation Monitoring, Compliance, and Reporting Plan for the Valley-Ivyglen and Alberhill Projects

Impact	Valley-Ivyglen Project Project Commitments and Mitigation Measures	Alberhill Project Project Commitments and Mitigation Measures	Monitoring Requirements	Timing
Impact TT-4: Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	~~**MM TT-1: Traffic Management and Control Plan.**~~	~~**MM TT-1: Traffic Management and Control Plan**~~	~~See above~~	~~See above~~
	MM TT-6: Road Damage Repair. SCE shall restore and repair to pre-project conditions any private roads damaged by project vehicle traffic. SCE shall document roadway conditions with photographs prior to the project along roads identified for heavy vehicle use in the project's Traffic Impact Analysis. SCE shall also take photographs after the project and after completion of any repairs to document restoration of pre-project pavement conditions.	**MM TT-6: Road Damage Repair.**	Verify the documentation and restoration of damaged roads	Prior to and post construction
Impact TT-5: Result in inadequate emergency access	**MM TT-7: Emergency Service Provider Notification.** SCE shall notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of road closures at least one week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE shall also coordinate with local emergency service providers to ensure emergency vehicle access at all times during construction by, for example, keeping metal plates available to cover open trenches.	**MM TT-7: Emergency Service Provider Notification.**	Verify notification of emergency service providers	Prior to and during construction
Impact TT-6:Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities	~~**MM TT-1: Traffic Management and Control Plan**~~	~~**MM TT-1: Traffic Management and Control Plan**~~	~~See above~~	~~See above~~