

## **D. Applicant**

This section provides responses to comments about the Draft EIR received from the Applicant.

## D1 Comments



Milissa Marona  
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July 30, 2009

VIA E-MAIL AND U.S. MAIL

Mr. Jensen Uchida  
CPUC CEQA Project Manager  
Energy Division  
c/o Valley-Ivyglen Subtransmission Line and Fogarty Substation Project  
130 Battery Street, Suite 400  
San Francisco, CA 94111

Re: Southern California Edison Company's Comments to  
Draft Environmental Impact Report Valley-Ivyglen  
Subtransmission Line and Fogarty Substation Project  
(A.07-01-031/A.07-04-028)

Dear Mr. Uchida:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for Southern California Edison Company's (SCE) Valley-Ivyglen Subtransmission Line and Fogarty Substation Project. SCE's comments to the Draft Environmental Impact Report are set forth in the enclosed table.

Very truly yours,

/s/Milissa T. Marona

Milissa T. Marona

Enclosures

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Number	Page	Text reference	Comment	
1	ES-5	Air Quality ...Project would generate greenhouse gases (GHG) that exceed baseline emissions in Riverside County.	Please specify what baseline emissions in Riverside County are.	D1-1
2	ES-5	Land Use The Project would both temporarily and permanently transform the relatively natural condition of some of the project area as it would be visible from eligible state Scenic Highways SR-74 and I-15 and would therefore conflict with one policy in the Land Use Element of the Riverside County General Plan (LU13.5).	The project conflicts with the referenced policy because it will not be undergrounded. Many areas along I-15 and SR-74 in Riverside County are designated Light Industrial, Commercial Retail, Mineral Resources Open Space, or Residential. These developments are visible from the highways and obstruct the view of the natural landscape. Please delete this language and clearly state that the project conflicts with the policy because it will not be undergrounded and will be visible from SR-74 and I-15. Other projects have and will continue to “transform the relatively natural condition of the project area”; accordingly, it is inaccurate to attribute this “transformation” to the project.	D1-2
3	ES-6	Visual Resources ...affect sensitive viewpoints for motorists and residents along eligible State Scenic Highways.	Please see comment #2.	D1-3
4	ES-6	Visual Resources The contrast of permanent development in the project area...	Please see comment #2.	D1-4
5	ES-7	Alternative 2, 1st paragraph ...along the existing 500 kV ROW as this ROW is not regularly maintained.	This language is incorrect. Please insert the following: “Maintenance in the existing 500 kV corridor occurs once per year.”	D1-5

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6	ES-11 to ES-12	MM BIO-1c (Noise Control) The Applicant shall avoid impacts to migratory and sensitive bird species...	Please add the following sentence to the end of the mitigation measure: "If the appropriate buffer cannot be maintained, the CDFG and USFWS will be contacted by the Applicant's biologist to discuss changes to the exclusion zone."	D1-6
7	ES-15	MM BIO-5a (Western Riverside County MSHCP Compliance) The Applicant will comply with all regulations and policies outlined in the MSHCP....	SCE is not required to pay Local Development Mitigation Fees, those fees are specific to developers.  Therefore change clause a. to "The payment of Mitigation Fees and other relevant fees as set forth in Section 11.8.3 in the MSHCP Implementing Agreement."  Remove b. The HANS process is for developers, SCE is not required to comply with HANS.	D1-7  D1-8
8	ES-13 to ES-15	Last impact on ES-13  MM BIO-2b (Erosion Control): The BMPs included in the Storm Water Pollution Prevention Plan (SWPPP) will be implemented during construction to minimize impacts associated with erosion. BMPs will include the installation of sediment and erosion control structures to protect biological resources, including streams, as well as roadways and adjacent properties. Watering for dust control during construction will also be employed.  MM BIO-2c (Hydrologic Impacts): Potential hydrologic impacts would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, and mulching and seeding of all disturbed areas. These measures will be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water.	MM BIO-2b and 2c belong under Hydrology rather than Biology and should just be referenced in Biology.	D1-9

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Number	Page	Text reference	Comment	
9	ES-20	D.6 Geology, Soils, and Mineral Resources Impact GEO-1. Adverse Effects to People and Structures Due to Seismic Activity.	The document indicates that this impact is significant before mitigation. However, with project design features and implementation of BMPs it should be less than significant as determined in the PEA and documented on pages 4.7-18 through pages 4.7-22. Therefore, no mitigation measures are necessary.	D1-10
10	ES-20	D.6 Geology, Soils, and Mineral Resources Impact GEO-1 Mitigation Measure GEO-1a	Worker safety is under the jurisdiction of OSHA or Cal OSHA, and is not a CEQA issue for potential seismic hazards. Also, the MM requires a site-specific safety plan with seismic activity highlighted to be submitted to the CPUC for approval, but the CPUC does not have approval authority (OSHA or Cal OSHA jurisdiction). This mitigation measure should be deleted.	D1-11
11	ES-20	D.6 Geology, Soils, and Mineral Resources Impact GEO-1 Mitigation Measure GEO-1b	Geotechnical investigations are a required element of project design, and as such a defined component of the project. Therefore, a geotechnical study is not a mitigation measure and this measure should be deleted.	D1-12
12	ES-20	D.6 Geology, Soils, and Mineral Resources Impact GEO-1 Mitigation Measure GEO-1c	Requiring a site-specific fault rupture analysis for each pole location would require studies at approximately 700 separate locations. The time alone would delay project construction for one to two years. Project components are not located within either state (Alquist-Priolo) or County designated fault rupture hazard zones, and structures are not for human occupancy. Thus, these studies are not required. Furthermore, with implementation of proposed project design elements, this impact is less than significant and this mitigation measure should be deleted.	D1-13
13	ES-21	D.6 Geology, Soils, and Mineral Resources Impact GEO-1 Mitigation Measure GEO-1d	Compliance with the CBC and other applicable building codes is required for all projects, and therefore, an integral element of project design. As such, regulatory compliance is not a mitigation measure and this measure should be deleted.	D1-14

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Number	Page	Text reference	Comment	
14	ES-21	D.6 Geology, Soils, and Mineral Resources Impact GEO-2. Soil Erosion	The document indicates that this impact is significant before mitigation. However, the impact should be less than significant as determined in the PEA and documented on pages 4.7-18 through pages 4.7-22. Therefore, no mitigation measures are necessary.	D1-15
15	ES-21	D.6 Geology, Soils, and Mineral Resources Impact GEO-2 Mitigation Measure GEO-2a	A SWPPP is a required element of project design, and as such a defined component of the project. Therefore, a SWPPP is not a mitigation measure and this measure should be deleted. Furthermore, the CPUC does not have approval authority for SWPPPs.	D1-16
16	ES-21	D.6 Geology, Soils, and Mineral Resources Impact GEO-3. Soil Stability	The document indicates that this impact is significant before mitigation. However, the impact should be less than significant as determined in the PEA and documented on pages 4.7-18 through pages 4.7-22. Therefore, no mitigation measures are necessary.	D1-17
17	ES-21 & ES-22	D.6 Geology, Soils, and Mineral Resources Impact GEO-3 Mitigation Measure GEO-3a Impact GEO-4 Mitigation Measure GEO-3a	Geotechnical investigations are a required element of project design, and as such a defined component of the project. Therefore, a geotechnical study is not a mitigation measure and this measure should be deleted.	D1-18
18	ES-22	D.6 Geology, Soils, and Mineral Resources Impact GEO-4. Expansive Soils	Expansive soils at Fogarty Substation are addressed during engineering design. As such, this is a project element. The document indicates that this impact is significant before mitigation. However, the impact should be less than significant as determined in the PEA and documented on pages 4.7-18 through pages 4.7-22. Therefore, no mitigation measures are necessary.	D1-19
19	ES-22 through ES-25	D.7 Hydrology and Water Quality Impacts HYD-1, HYD-3, HYD-5, HYD-7, HYD-9	These impacts should be less than significant as determined in the PEA and documented on pages 4.9-13 through pages 4.9-18. Therefore, no mitigation measures are necessary.	D1-20

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Number	Page	Text reference	Comment	
20	ES-25	D.7 Hydrology and Water Quality Impacts HYD-10. Inundation by Seiche, Tsunami or Mudflow.	There is no inundation impact associated with Seiche, Tsunami or Mudflow as determined in the PEA and documented on pages 4.8-8 through pages 4.8-13. The DEIR incorrectly classifies this as a less than significant impact when there is actually no impact.	D1-21
21	ES-25	D.8 Hazards and Public Safety Impact HAZ-3. Hazardous Emissions within a Quarter Mile of a School	This impact should be less than significant as determined in the PEA and documented on pages 4.8-8 through pages 4.8-13. Therefore, no mitigation measures are necessary. The project would not result in hazardous emissions. Only one school is located within a quarter mile of the proposed project and it would not be exposed hazardous emissions. Additionally, measures proposed by SCE are required project elements and, therefore, should not be labeled as mitigation.	D1-22
22	ES-26	D.8 Hazards and Public Safety Impact HAZ-6. Public or Worker Safety Hazards Due to Proximity to Private Airstrip	This impact was not properly analyzed DEIR and should be less than significant. One public comment does not warrant a significant impact finding without further analysis. Given the fact that safety reasons warrant a finding that hang gliders should not be flying in proximity to the freeway, the project impeding their ability to do so does not support a significant impact finding. Furthermore, the addition of the proposed visibility markers will create additional visual impacts that were not addressed in the visual impacts section of the DEIR. For these reasons, this impact should be considered less than significant and proposed mitigation should be deleted.	D1-23 D1-24
23	B-1	Introduction ...provide supplementary electrical services to the City of Lake Elsinore area.	Please replace this language with, The project will allow SCE to reliably serve electrical demand in southwestern Riverside County. The project is providing more than supplementary electrical services.	D1-25

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24	B-26	B.3.2.1 Telecommunications Lines	<p>The telecommunication routes described in SCE's PEA were developed for SCE's Proposed Project. The telecommunication route may require slight modifications in order to ensure diverse telecommunication paths to the same substations if Alternative 5 is selected by the CPUC.</p> <p>Additionally, SCE has identified a land access issue regarding a parcel adjacent to and on the east side of San Jacinto Road west of SCE's existing Valley Substation. SCE does not have the necessary rights to place SCE's telecommunication facilities underground in this location. SCE has identified an alternative path using existing overhead structures that will allow SCE to bypass the parcel with the rights limitations.</p> <p>Please revise the Telecommunication Lines description to reflect the potential need for these minor modifications to the proposed telecommunication line route.</p>	<p>D1-26</p> <p>D1-27</p> <p>D1-28</p>
25	B-35	B.4 Construction and Schedule Project would take approximately 12-18 months with all four components of the project potentially initiating and terminating at various times within the 12-18 month timeframe.	As discussed on p. B-37, all four components of the project would actually take 24 months to complete. All schedule references should be adjusted accordingly.	D1-29
26	B-36	Wire Pulling ...and one 4/0 ACSR ground conductor.	Please clarify that the ground wire will be a 336 groundwire.	D1-30



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27	B-40	B.4.3 Fogarty Substation Construction, last paragraph It is estimated that up to 50,000 cubic yards of imported fill would be required if the site is graded...	In the time since SCE has filed its application for this project, it has changed its approach for site preparation and decided to use cut and fill on the substation property, substantially lessening the amount of fill required to be imported to the site.  It is estimated that 7,450 cubic yards of soil would be cut, and 8,250 cubic yards would be needed for fill, resulting in an import of approximately 800 cubic yards of soil to grade the site. Therefore, this statement should be revised in the DEIR.	D1-31
28	C-3	Land Use ...visible from Eligible Scenic Highways SR-74 and I-15 and therefore...	Please see comment #2.	D1-32
29	C-27	Central Region Route Segment Alternative (Alternative 3) ... would travel through less densely populated residential areas, resulting in fewer impacts to visual resources and land use than the Project...	This statement fails to take into the account that segment C-2 would require upgrading easements through existing parcels and potentially condemnation and relocation of existing property owners. Accordingly, this alternative is not likely to reduce land use impacts as previously anticipated. On the contrary, it would physically divide an existing community.  Additionally, this paragraph should be revised to disclose the fact that segments C-4 and C-6 of this Alternative would traverse an existing rock quarry, an additional environmental impact that is not currently discussed in the DEIR.	D1-33  D1-34
30	C-27 to C-28	Central Region Route Segment/Warm Springs-Pacific Clay Alternative (Alternative 5)	Please see comment #'s 31 and 70.	D1-35

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31	C-28	<p>Western Region Route Segment Alternatives A and B</p> <p>The use of segments W-2, W-3, W-4, W-8 and W-10 would require replacing the existing crossing of I-15. This would result in removal of the Valley-Elsinore-Ivyglen 115 kV subtransmission line from service and, consequently, would not meet Project objectives. The use of segments W-1, W-4, and W-5 would generate significant land use conflicts. These alternatives are therefore eliminated from further consideration.</p>	<p>This paragraph dismisses segments W-10 and W-5 when utilized with other segments of proposed Western Region Route Segment Alternatives, which is appropriate.</p> <p>However, segment W-10 is proposed for use as part of the Proposed Project and preferred Alternative 5, as Alternative 5 does not propose revisions to the portion of the Proposed Project that includes segment W-10. Accordingly, this paragraph should clarify the fact that when utilized in combination with other segments segment W-10 meets project objectives.</p> <p>Similarly, SCE has discovered an inaccuracy in its PEA. On p.4.10-13, the PEA states that W-5 would pass through additional residential lands, including passing between private residential properties in the community located just to the southeast of Glen Ivy. Since submitting its PEA, SCE has determined that segment W-5 could be constructed within an existing roadway; therefore, its construction would not result in the significant and unavoidable land use and aesthetics impacts discussed in the PEA. Moreover, segment W-5 is not dismissed as infeasible in the DEIR and there is no evidence besides the aforementioned PEA error that would support a finding of infeasibility. Accordingly, SCE requests that the paragraph be revised to clarify the fact that when utilized in combination with segments other than W-1 and W-4, segment W-5, also meets project objectives.</p>
			D1-36
			D1-37
			D1-38
32	D.1-2	<p>1st paragraph</p> <p>...review of all technical information submitted to the County...</p>	<p>Did you mean "submitted to the CPUC"? If so, please revise.</p>
			D1-39

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33	D.1-2	Significance Criteria ...as set forth in the CEQA Environmental Check List as modified by CPUC policy...	Please provide a reference regarding where to find the CEQA Environmental Checklist as modified by CPUC policy.	D1-40
34	D.2-19	Significance Criteria ...the Project would have a significant impact on public health and safety if...	This sentence should include the term "land use" as opposed to "public health and safety". Please revise.	D1-41
35	D.2-20	Bullet ...Require new or relocated electric or communication distribution lines...	The Valley-Ivyglen 115 kV subtransmission line is not a distribution line. Please revise this sentence accordingly.	D1-42
36	D.3-37	Fogarty Substation ...and would violated (sic) regional regulations protecting scenic vistas within view of an Eligible State Scenic Highway.	The parcel for Fogarty Substation is designated as residential, and its development has been evaluated for its effect on State Scenic Highways by Riverside County. Please revise the text accordingly.	D1-43
37	D.3-39	2nd paragraph The Applicant does intend to install the Subtransmission Line wholly underground...	This sentence should read, "SCE does <b>not</b> intend to install the subtransmission line wholly underground."	D1-44
38	D.3-40	Last paragraph The impact of the proposed subtransmission route would be particularly acute in Segment 2B where it would replace existing wood poles...	Pole replacement does not substantiate a conclusion that the project would result in an acute change. On the contrary, the fact that project poles will replace existing structures supports a conclusion that impacts will be less significant. Please revise the text accordingly.	D1-45

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39	D.3-43	Last paragraph The segment of the proposed route along SR-74 would block views of scenic resources...	The proposed subtransmission poles would be similar in nature to street light poles, and would not block views of individuals 20 feet away and travelling at approximately 45 miles per hour. Please revise the text to reflect the fact that poles would not block views of scenic resources.	D1-46
40	D.4-13 to D.4-16	Table D.4-2 Special status wildlife species known to occur or with the potential to occur within the project areas	Several species listed as Moderate or High Potential to occur at Fogarty need to be changed to Low due to lack of suitable habitat (see D.4-3): Southern California rufus-crowned sparrow, Bell's sage sparrow, southwestern willow flycatcher, yellow-breasted chat, coastal California gnatcatcher, Least bell's vireo, orange-throated whiptail, coastal western whiptail, and Coast Range newt.	D1-47
41	D.6-18 to D.6-25	D.6.3 Project Impacts and Mitigation	The Geology and Soils analysis should be revised to reflect the points made in Comments 9-19. Many of the impacts classified as significant prior to implementation of mitigation, should be classified as less than significant and the proposed mitigation for these impacts should be described as project design features/elements rather than mitigation.	D1-48
42	D.6-20	2nd paragraph The telecommunications system would traverse the documented Alquist-Priolo Hazard Zone for the Ivyglen Fault....	The telecommunications line would not cross an A-P Fault Hazard Zone.	D1-49
43	D.7-10	Last paragraph Flood hazards would not affect the Ivyglen Substation.	The Ivyglen Substation is not in a flood hazard zone. Please revise the text to reflect this fact.	D1-50
44	D.7-15	Last paragraph ...but also increase the amount of wastewater...	Construction of the project would not result in wastewater discharge. This language should be deleted.	D1-51

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45	D.7-17	3rd paragraph ... after implementation of the Construction and Operations SWPPPs (HYDRO-SCE-1, 2, and 3).	Please replace with the following language, "After implementation of APMs HYDRO-SCE-1, 2, and 3."	D1-52
46	D.8-1	Last paragraph The Valley-Ivyglen Subtransmission Line and telecommunications system are located within a 25 mile long, 4,000 foot wide corridor...	115 kV subtransmission corridors are typically 30 feet wide, and may be wider in areas where the surrounding terrain must be stabilized. Please revise this sentence to reflect the appropriate corridor width.	D1-53
47	D.8-17	Impact HAZ-3 ...the Applicant Contact DigAlert2006 as part...	SCE will contact Underground Service Alert as opposed to DigAlert2006 prior to finalizing engineering design. Please revise the sentence accordingly.	D1-54
48	D.8-18	Impact HAZ-6, 2nd paragraph Visibility markers such as orange balls on the lines in segment C6 would reduce the risk of hang glider entanglement with powerlines...	To protect public safety, hang gliders should not fly less than 80 feet from the ground in proximity to a 6-lane interstate freeway. The text should be revised to reflect this fact. Please see comment #22.	D1-55
49	D.8-18	MM HAZ-6a The Applicant shall use visibility markers on all portions of the proposed subtransmission line within half a mile in either direction of I-15 where the line crosses I-15 near Nichols Road.	This mitigation measure does not mitigate a significant environmental effect of the Project. Please see comment #22.	D1-56
50	D.8-20	Last Paragraph "An acknowledged potential impact to public health from electric transmission lines is the hazard of electrical shock: electric shocks from transmission lines are generally the result of accidental or unintentional contact by the public with the energized wires"	This sentence should be removed from the Electric and Magnetic Fields (EMF) section because it does not deal with EMF.	D1-57

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Number	Page	Text reference	Comment	
51	D.8-21	4 <sup>th</sup> paragraph “In undeveloped and natural areas, measurable EMFs are not present except in the vicinity of existing power line corridors.”	This should read: “In undeveloped and natural areas, measurable <b>power-frequency</b> EMFs are not present except in the vicinity of existing power line corridors.” This is because the earth’s DC magnetic field would be measurable at these locations.	D1-58
52	D.8-21	Last Paragraph “However, the most significant contributors to the EMFs are the subtransmission and distribution line.”	Should read: “However, the most significant contributors to the EMFs <b>outside of the substation fenceline</b> are the subtransmission and distribution line.”	D1-59
53	D.8-28	1st paragraph ...potential MMs... “low-cost or no-cost” MMs...	These are not CEQA mitigation measures, they are EMF reduction measures. Please revise this paragraph to make clear that proposed measures are not CEQA mitigation measures.	D1-60
54	D.9-5	Last paragraph As discussed above, the Project would contribute to population growth in the area.	As discussed in Section F.1, Growth Inducing Effects, the project would not contribute to population growth. The text should be revised accordingly.	D1-61
55	D.10-8	Second paragraph At this time, there are no mandatory GHG regulations or finalized agency guidelines that would apply to this project...	As discussed on p. A-14, CPUC authority does not preempt special districts like SCAQMD. SCAQMD has <i>formally adopted</i> interim GHG significance thresholds, while CPUC does not have formally adopted interim GHG policy. Accordingly, SCAQMD’s adopted GHG thresholds are the most appropriate thresholds for purposes of the project, and should be utilized in order to determine the significance of the project’s GHG emissions.	D1-62

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Number	Page	Text reference	Comment	
56	D.10-11	Numbered items 3. Improvements to the existing Valley and Ivyglen Substations	Add the word Telecommunications at the beginning of the sentence. "Telecommunications improvements to the existing Valley and Ivyglen Substations."	D1-63
57	D.10-11	D.10.3, Last paragraph ...small quantities of SF6 could leak from transformers...	There is no SF6 in transformers. Please delete this portion of the sentence.	D1-64
58	D.10-12	First paragraph Although SCAQMD has interim criteria for assessing the significance of GHG emissions...	Please see comment #55.	D1-65
59	D.10-15	MM AIR-1d	This mitigation measure is not required because it does not mitigate a significant impact.  SCE will designate a construction coordinator to ensure than all field personnel are trained on their responsibilities under the Mitigation Monitoring Plan, and to verify that all mitigation measures are being complied with. Therefore, this mitigation measure should can and should be deleted.	D1-66
60	D.10-15	MM AIR-1e	This mitigation measure is not required because it does not mitigate a significant impact.  SCE will train all field personnel on their responsibilities under the Mitigation Monitoring Plan.	D1-67

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61	D.10-18 to D.10-19	Impact AIR-5 and Impact Air-6	<p>The proposed CEQA Guideline amendments for greenhouse gas emissions developed by the Governor's Office of Planning and Research indicate that this issue is more appropriately discussed in the Cumulative Impacts section of the DEIR. The conclusion that project specific impacts are significant and unavoidable is inconsistent with this premise.</p> <p>Additionally, Project GHG emissions are expected to be less than 4,229 metric tons of CO<sub>2</sub>e per year during construction and approximately 34 metric tons CO<sub>2</sub>e per year during operation. Both of these numbers are far below the 10,000 metric ton CO<sub>2</sub>e di minimus standard contained in adopted SCAQMD interim thresholds and the 7,000 metric ton CO<sub>2</sub>e di minimus standard currently proposed by CARB. Accordingly, the significant and unavoidable impact finding does not appear to be warranted with respect to project specific or cumulative impact findings. SCE requests that the analysis be revised to reflect this comment and that proposed mitigation measures be deleted.</p>	D1-68  D1-69
62	D.10-19	GHG Emissions from Project Operations, last paragraph ...SF <sub>6</sub> used in circuit breakers and/or transformers.	There is no SF <sub>6</sub> in transformers. Please revise this sentence accordingly.	D1-70
63	D.10-19	Impact AIR-6, 1st paragraph Five new 220-kV circuit breakers...	The circuit breakers would be 115 kV. Please revise this sentence accordingly.	D1-71



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64	D.10-20	Cumulative Impacts	The discussion in this section is inaccurate.  The discussion does not mention air emissions from the proposed Toscana Marketplace (1,000,000 sq feet of development) or the Nevada Hydro Pump Storage project (LEAPS), or the ongoing operations of Pacific Clay Products (1,374 acre active mine). When compared to the operation emissions of these types of developments, construction emissions from the Project represent a negligible increase in emissions.	D1-72
65	D.13-2	2nd paragraph  The Project would expand the Applicant's existing electrical service.	The project will do more than expand existing electrical service. The project will allow SCE to reliably serve electrical demand in southwestern Riverside County. Please revise the text accordingly.	D1-73
66	D.14-8	Last paragraph  ...the Project is considered to have a significant contribution to agricultural impacts in the County.	Agricultural use is permitted in subtransmission corridors with landowner compliance with clearance restrictions. The parcel used for Fogarty Substation is not designated agricultural. Therefore, the project will not require the taking of agricultural lands and cumulative agricultural impacts will be less than significant. The significance finding should be revised accordingly.	D1-74
67	D.16-1	2nd bulleted list  Agricultural Resources	Agricultural impacts are not cumulatively considerable. Please see comment #66.	D1-75
68	D.16-2	Bulleted list  Agricultural Resources	Agricultural impacts are not significant. Please see comment #66.	D1-76
69	E-7	E.2.3 Alternative 3: Construct the central portion of the subtransmission line along segments C-2, C-4, and C-6	Please see comment #29.	D1-77

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70	E-10 to E-21	E.2.5 Alternative 5: Construct the subtransmission line along segments C-8, C-9, W-3, W-13 and W-14 (Warm Springs-Pacific Clay Alternative)	<p>Please see comment #30. SCE supports Alternative 5, which similar to the proposed project would utilize segment W-10. While segment W-10 remains feasible, since submitting the PEA, it has come to SCE's attention that alternative segment W-5 is a viable alternative to the segment and that W-5 would eliminate significant engineering issues and would further reduce less than significant environmental impacts that are expected to be encountered during construction of W-10.</p> <p>Accordingly, SCE requests that the discussion of Alternative 5 be revised to include analysis of segment W-5 and any potential impacts that would be associated with constructing segment W-5 as an alternative to segment W-10.</p>	D1-78
71	F-3	<p>Air Quality</p> <p>These [GHG] emissions would not be reversible, and this impact would be both significant and irreversible.</p>	<p>Please see comment #'s 55 and 61.</p> <p>Additionally, if the Project facilitates the use of renewable energy, the GHG emissions associated with construction would be further reduced.</p>	D1-79

## Responses to D1 Comments Southern California Edison Company

- D1-1** No baseline greenhouse gas emissions figures are necessary to support the argument that a new source of emissions is an additional source as compared to the existing baseline conditions. Construction activities associated with the Project did not occur previously and, therefore, would contribute additional greenhouse gas emissions to the atmosphere. Please refer to the revisions to page ES-5 of the Draft EIR (Final EIR Section 4.1). In addition, refer to the response to comment D1-62.
- D1-2** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. However, the discussion about the Riverside County General Plan Land Use Element is valid, and no change was made to the Draft EIR. As stated on page D.2-23 of the Draft EIR, “Though the Project would conflict with some of the land use plans, policies, and regulations in the County it is important to note that the CPUC’s jurisdiction over electric power line projects and substations provides the Applicant with exempt status by General Order No. 131-D. However, the CPUC does require that public utilities consult with local agencies and consider local regulations in locating projects.”
- D1-3** It is acknowledged that other projects have affected visual resources within view of Interstate 15 (I-15) and State Route 74 (SR-74); however, the statement on page ES-6 that “the Project would both temporarily and permanently transform the relatively natural condition of some of the project area and potentially affect sensitive viewpoints for motorists and residents along eligible State Scenic Highways” is valid. These roadways are eligible State Scenic Highways, and therefore, the expectation of a view for both motorists and nearby residents is high. Construction activities would introduce contrast from clutter in the form of signage and fencing; the storage of construction materials and equipment; and the exposure of soils at locations where new poles would be installed. The project would introduce permanent contrast for the portion of SR-74 where tubular and light-duty steel poles would replace existing wood poles. The color, texture, and scale of the new poles would be less harmonious with the existing setting than wood poles. The Project would also introduce contrast from the intersection of SR-74 and I-15 to the Ivyglen Substation. This segment of the new subtransmission line route would be constructed in an area without existing transmission lines. Additionally, the Fogarty Substation would be constructed on an undeveloped site along this route.
- D1-4** Please refer to the response to comment D1-3.
- D1-5** See revisions to page ES-7 of the Draft EIR (Final EIR Section 4.1).
- D1-6** MM BIO-1c does not suggest that the Applicant’s biologist cannot negotiate with the CDFG or USFWS if an appropriate buffer cannot be maintained due to project requirements. Regardless, approval under the circumstances presented in MM BIO-1c is up to the CDFG and USFWS. No change to MM BIO-1c was made.
- D1-7** MM BIO-5a has been removed from the Draft EIR. Refer to the revised Biological Resources section (Chapter 5 of the Final EIR).
- D1-8** MM BIO-5a has been removed from the Draft EIR. Refer to the revised Biological Resources section (Chapter 5 of the Final EIR).

- D1-9** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. The statement, however, does not raise concerns regarding the analysis or conclusions presented in the EIR. No changes were made to MM BIO-2b. MM BIO-2c was removed and Hydrology chapter was referenced.
- D1-10** The analysis of Impact GEO-1 is valid. Mitigation is required to reduce impacts to less than significant levels. Refer to responses D1-11 to D1-14.
- D1-11** It is acknowledged that worker safety is an OSHA issue, but safety is also an issue under CEQA. Refer to Appendix G of the CEQA Guidelines, Section VI, Geology and Soils: “Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) 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. (ii) Strong seismic ground shaking? (iii) Seismic-related ground failure, including liquefaction? or (iv) Landslides?” However, please refer to revisions to MM GEO-1a on page D.6-21 of the Draft EIR (Final EIR Section 4.5).
- D1-12** It is acknowledged that a geotechnical study was discussed under APM GEO-SCE-2 and is an element of the Project. APM GEO-SCE-2, however, was not specific enough, and MM GEO-1b was added to the Draft EIR. No changes to MM GEO-1b were made.
- D1-13** MM GEO-1c was deleted. Please refer to the revisions made to pages ES-20, ES-21, D.6-20, and D.6-21 of the Draft EIR (Final EIR Sections 4.1 and 4.5).
- D1-14** MM GEO-1d was deleted. Please refer to the revision made to page D.6-21 of the Draft EIR (Final EIR Section 4.5).
- D1-15** The analysis of Impact GEO-2 is valid. Mitigation is required to reduce impacts to less than significant levels. Refer to the response to comment D1-16.
- D1-16** MM GEO-2a was added to the Draft EIR because APM GEO-SCE-3 was not specific enough. Please refer to the revisions made to MM GEO-2a on page D.6-22 of the Draft EIR (Final EIR Section 4.5). It is acknowledged that a Storm Water Pollution Prevention Plan was discussed under APM GEO-SCE-3 and is an element of the Project. APM GEO-SCE-3, however, was not specific enough, and MM GEO-3a was added to the Draft EIR.
- D1-17** The analysis of Impact GEO-3 is valid. Mitigation is required to reduce impacts to less than significant levels. Please refer to the response to comment D1-18.
- D1-18** Please refer to the revisions made to MM GEO-3a on pages D.6-23 to D.6-24 of the Draft EIR (Final EIR Section 4.5).
- D1-19** The analysis of Impact GEO-4 is valid. Mitigation is required to reduce impacts to less than significant levels. Please refer to the response to comment D1-18.
- D1-20** It is acknowledged that the implementation of an applicant proposed measure is considered part of the Project. A mitigation measure was required to reduce the impact to Class II—less than significant with mitigation. Please refer to the revisions made to page D.7-16 and D.7-18 of the Draft EIR (Final EIR Section 4.5). The Class II determinations were changed to Class III for

Impact HYD-3. No changes were made to the significance determinations for Impact HYD-1, Impact HYD-5, Impact HYD-7, or Impact HYD-9.

- D1-21** The “no impact” and “less than significant impact without mitigation measures” determinations are both classified as Class III in the Draft EIR. No change was made to Impact HYD-10.
- D1-22** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. The statement, however, does not raise concerns regarding the analysis or conclusions presented in the EIR. It was determined that Impact HAZ-3 would be Class II—a less than significant impact after mitigation measures are implemented. The use of a mitigation measure in this case will ensure that the elements of MM HAZ-2a are part of the mitigation monitoring plan (Chapter G). No changes were made to the analysis or MM HAZ-2a.
- D1-23** Hang gliders in the Lake Elsinore area are currently landing on a stretch of beach near the Elsinore West Marina with the owner’s permission (Burgin 2008). An approved landing zone is located approximately 3 miles south of the subtransmission line at the nearest point and 3.25 miles southwest of where the subtransmission line crosses I-15. The addition of visibility markers to the subtransmission line was required under MM HAZ-6a in the Draft EIR. The approved landing zone, however, is far enough from I-15 and the proposed subtransmission line that visibility markers would not be required. Therefore, MM HAZ-6a was removed. Please refer to the revisions made to pages ES-26, D.8-18, and I-10 of the Draft EIR (Final EIR Sections 4.1, 4.5, and 4.10).
- D1-24** Refer to the response to comment D1-23.
- D1-25** Please refer to the revisions made to page B-1 of the Draft EIR (Final EIR Section 4.3).
- D1-26** Please refer to the revisions made to page C-30 and pages E-1 and E-11 of the Draft EIR (Final EIR Sections 4.4 and 4.6).
- D1-27** Please refer to the revisions made to page B-26 of the Draft EIR (Final EIR Section 4.3).
- D1-28** See responses to comments D1-26 and D1-27.
- D1-29** Please refer to the revisions made to pages B-35 (Final EIR Section 4.3); D.3-38, D.4-31, D.11-9, D.11-11, D.12-10, D.15-3 (Final EIR Section 4.5); and F-1 (Final EIR Section 4.7).
- D1-30** Please refer to the revision made to page B-36 of the Draft EIR (Final EIR Section 4.3).
- D1-31** Please refer to the revisions made to pages B-40 to B-41 of the Draft EIR (Final EIR Section 4.3).
- D1-32** See response to comment D1-2.
- D1-33** Please refer to the revisions made to page C-27 of the Draft EIR (Final EIR Section 4.4).
- D1-34** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. The statement, however, does not raise concerns regarding the analysis or conclusions presented in the EIR. The mineral resources determination

is already Class I for Alternative 3. No changes were made to the analysis of Alternative 3 in Chapter C or Chapter E of the Draft EIR.

- D1-35** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.
- D1-36** Please refer to the revisions made to page C-28 of the Draft EIR (Final EIR Section 4.4).
- D1-37** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. Segment W-5, however, would be constructed closer to a residential community than the proposed route. The residential community borders the south side of Campbell Ranch Road. The community is shown just south and east of the Ivyglen Substation in Figure C.2-2. See also the revised Figure C.2-2 in the Final EIR. Even if Segment W-5 could be constructed along an existing roadway, it is likely that it would still be visible from I-15. In addition, it would be more visible to residents south of Campbell Ranch Road. In addition, pursuant to CEQA Section 15126.6, a reasonable range of alternatives has already been considered in the Draft EIR. Therefore, no change was made to the analysis of Segment 5 in the Draft EIR.
- D1-38** See response to comment D1-37.
- D1-39** Please refer to the revision made to page D.1-2 of the Draft EIR (Final EIR Section 4.5).
- D1-40** The application of a *significance class* system for significance determinations in EIRs is determined on a project by project basis by the CPUC. For this EIR, Classes I, II, and III were found to be appropriate for classifying the significance of environmental impacts.
- D1-41** Please refer to the revision made to page D.2-19 of the Draft EIR (Final EIR Section 4.5).
- D1-42** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. The statement, however, does not raise concerns regarding the analysis or conclusions presented in the EIR. Additionally, the comment concerns information presented in the Draft EIR that was taken from the Riverside County General Plan. The information is valid, and no change was made.
- D1-43** It is acknowledged that the parcel for the Fogarty Substation is designated as residential. The Fogarty Substation would be visible from an eligible State Scenic Highway. Riverside County has Land Use Elements designed to protect scenic resources within view of an Eligible State Scenic Highway. Therefore, the Fogarty Substation would violate regional regulations protecting scenic vistas within view of an eligible State Scenic Highway.
- D1-44** Please refer to the revision made to page D.3-39 of the Draft EIR (Final EIR Section 4.5).
- D1-45** It is acknowledged that pole replacement does not necessarily result in an impact to visual resources and that the replacement of existing poles is frequently less of a visual impact than the construction of new lines. The assessment of visual impacts, however, is valid because the replacement of existing wood poles with tubular and light-duty steel poles would result in an increased degree of contrast with the existing setting. Wood poles have a more natural appearance that is more harmonious with the visual setting than tubular and light-duty steel poles in terms of color, texture, and scale.

- D1-46** Please refer to the revision made to page D.3-43 of the Draft EIR (Final EIR Section 4.5).
- D1-47** Table D.4-2 was revised for all species that may occur based on available suitable habitat. Of the species stated in the comment, the potential for occurrence at the proposed Fogarty Substation site was changed from moderate/high to low for the following: yellow-breasted chat, least Bell's vireo, and coastal western whiptail. Southwestern willow flycatcher had already been noted as low in the Draft EIR. The potential for occurrence of the other species listed in the table was not changed based on the information on suitable habitat provided in the Biological Technical Report for the Fogarty Substation (AMEC 2006b). Refer to the revised Biological Resources section (Chapter 5 of the Final EIR).
- D1-48** Refer to responses to comments D1-10 to D1-19.
- D1-49** Please refer to the revision made to page D.6-20 of the Draft EIR (Final EIR Section 4.5).
- D1-50** Please refer to the revision made to page D.7-10 of the Draft EIR (Final EIR Section 4.5).
- D1-51** Please refer to the revision made to page D.7-15 of the Draft EIR (Final EIR Section 4.5).
- D1-52** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. The statement, however, does not raise concerns regarding the analysis or conclusions presented in the EIR. No change was made.
- D1-53** Please refer to the revision made to page D.8-1 of the Draft EIR (Final EIR Section 4.5).
- D1-54** Please refer to the revision made to page D.8-17 of the Draft EIR (Final EIR Section 4.5).
- D1-55** Refer to responses to comments D1-23 and D1-24.
- D1-56** Refer to the response to comment D1-23.
- D1-57** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. The statement, however, does not raise concerns regarding the analysis or conclusions presented in the EIR. No changes were made.
- D1-58** Please refer to the revisions made to page D.8-21 of the Draft EIR (Final EIR Section 4.5).
- D1-59** Please refer to the revisions made to page D.8-21 of the Draft EIR (Final EIR Section 4.5).
- D1-60** The term *mitigation* is used by the CPUC with regard to EMF reduction. The term *MM* is not. Reference to the term *MM*, which means mitigation measure, was removed from page D.8-28. Refer to the revisions made to page D.8-28 of the Draft EIR (Final EIR Section 4.5).
- D1-61** Please refer to the revision made to page D.9-5 of the Draft EIR (Final EIR Section 4.5).
- D1-62** As the Lead Agency with principal responsibility for approving the Project, the CPUC may act with discretion in determining the levels of significance of impacts. Per Appendix G of the CEQA Guidelines, significance criteria established by an applicable air quality management or air

pollution control district may be relied upon to determine the significance of an impact; however, a lead agency is not prevented from making a different determination of the significance of project impacts as it sees as appropriate as long as the determination is based on substantial evidence. Refer to the CAPCOA 2008 reference added to page I-11 of the Draft EIR (Final EIR Section 4.10). Given the severity of the global climate change problem, the CPUC has determined that the “net zero” approach to mitigating greenhouse gas emissions from the Project is appropriate. As stated on page D.10-8 of the Draft EIR, “For this particular Project, a ‘net zero’ threshold has been adopted by the CPUC; this means that any activity resulting in any GHG emissions from the construction or operation and maintenance of this Project is to be considered significant.”

- D1-63** Please refer to the revision made to page D.10-11 of the Draft EIR (Final EIR Section 4.5).
- D1-64** Please refer to the revision made to page D.10-11 of the Draft EIR (Final EIR Section 4.5).
- D1-65** Please refer to the response to comment D1-62.
- D1-66** MM AIR-1d is applied to Impact AIR-1, a Class I significant impact. Under MM AIR-1d, a Construction Relations Officer would ensure the enforceability and efficacy of construction-related mitigation measures.
- D1-67** MM AIR-1e is applied to Impact AIR-1, a Class I significant impact. Under MM AIR-1e, all personnel working on the Project would be trained to minimize emissions and other air quality impacts.
- D1-68** The Governor’s Office of Planning and Research guidance does not preclude project-specific approaches to analyzing impacts. With a “net zero” approach (see response to comment D1-62), although the overall climate change issue is cumulative, impacts associated with greenhouse gas emissions are directly related to construction and operation of the Project.
- D1-69** Please refer to the response to comment D1-62.
- D1-70** Please refer to the revision made to page D.10-19 of the Draft EIR (Final EIR Section 4.5).
- D1-71** Please refer to the revision made to page D.10-19 of the Draft EIR (Final EIR Section 4.5).
- D1-72** It is acknowledged that the proposed Toscana Marketplace and LEAPS projects are reasonably foreseeable future projects, and impacts from the projects on air quality are anticipated. Please refer to the updated cumulative impacts analysis in Chapter 5 of the Final EIR.
- D1-73** Please refer to the revisions made to page D.13-2 of the Draft EIR (Final EIR Section 4.5).
- D1-74** Please refer to the revisions made to pages D.14-8, D.16-1, and D.16-2 of the Draft EIR (Final EIR Section 4.5).
- D1-75** Please refer to the response to comment D1-74.
- D1-76** Please refer to the response to comment D1-74.



**D1-77** Please refer to the response to comment D1-34.

**D1-78** Please refer to the response to comment D1-37.

**D1-79** While it is acknowledged that the Project may facilitate the delivery of renewable energy, there are no contracted deliveries scheduled in the design of the Project. Therefore, the association of clean energy with the Project is too speculative to include in the analysis of impacts. No change was made.