Angela Whatley
Senior Attorney
Real Property, Local Government Affairs
and Licensing
angela.whatley@sce.com

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VIA EMAIL
Ms. Lisa Orsaba, CEQA Project Manager, Energy Division
California Public Utilities Commission
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111
Email: Mesa.CPUC@ene.com

Re: SCE's Comments on the Draft Environmental Impact Report (SCH #2015061014) for the Mesa 500 kV Substation Project (A.15-03-003)

Dear Ms. Orsaba:

Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Report (DEIR) circulated by the California Public Utilities Commission (CPUC) on April 29, 2016. On behalf of Southern California Edison (SCE), the proponent of the Mesa Substation Project (Proposed Project) that is the subject of the DEIR, this comment letter and the attached table address issues that apply to the entire DEIR, with a primary focus on the analysis of alternatives. In light of the information provided in this letter, SCE requests that the CPUC prepare a Final EIR that dismisses the One-Transformer, Two-Transformer, and Gas-Insulated Substation Alternatives from consideration because all three fail to meet basic CPUC and SCE Project Objectives, none substantially reduce environmental impacts as compared to the Proposed Project (and are thus not environmentally superior), and the One-Transformer Alternative is not technically feasible.

I. OVERVIEW OF SCE'S COMMENTS ON THE DEIR

The DEIR concludes that the One-Transformer (1600 MVA) Substation, Two-Transformer (1120 MVA) Substation, and Gas-Insulated Substation Alternatives, which were developed at the CPUC's direction, are environmentally superior to SCE's proposed project. These alternatives deviate from the very purpose of the Proposed Project. As noted in the DEIR, "[b]y December 31, 2020 it is expected that approximately 4250 megawatts of electric generation in the Western Los Angeles Basin will be retired to comply with the State Water Resources Control Board Once-Through Cooling (OTC) policy, which aims to eliminate as much as possible coastal

or estuarine water usage for cooling."[1] The DEIR goes on to state that "…a substantial number of OTC units are slated to be retired" and that "OTC generation shutdown would stress the existing transmission system and impact its ability to provide reliable electric service beginning January 1, 2021 (CAISO 2014) under peak load conditions."[2] However, all three alternatives considered in the DEIR would result in a delay in meeting the OTC requirement date and should be dismissed because they fail to meet basic project objectives as stated by both the CPUC and SCE, not the least of which would be failure to achieve an operating date that coincides with the December 2020 OTC retirement date. Each of these alternatives would require significant redesign of the Mesa project. This redesign will cause significant schedule delay to the operating date. Further, contrary to the conclusion in the DEIR, *none* of the three alternatives are environmentally superior to the Proposed Project (and none substantially reduce significant environmental effects), due largely to the fact that all three alternatives fail to account for additional air quality impacts and traffic impacts related to supplementary soil import that would be needed if any reduced footprint option were chosen. In addition, the DEIR's environmental analysis is flawed on the basis that remaining comparisons mistakenly conclude substantial reductions in already less-than-significant impacts or the alternatives' impacts are found to be only "negligibly" or "slightly" better than the Proposed Project and not "substantially" as required by CEQA. Further, the One-Transformer Alternative is technically infeasible and should be dismissed from consideration on that fact alone.

First, the One-Transformer Alternative is technically infeasible due to the combination of the following reasons:

- It is not typical equipment used in SCE's service territory or neighboring utilities' service territories.
- The non-standard, single-phase 533MVA transformers making up the 1600MVA bank, which are 40% larger than the Proposed Project's transformers, would result in additional shipping issues due to truck size.
- Due to increased current flows of the oversized transformer, the alternative would require additional custom equipment (i.e. circuit breakers and disconnect switches) to handle the higher ratings.
- The single-phase 533MVA transformers have an extraordinarily long lead-time for procurement due to development and type testing.
- Due to the custom nature and long lead time the single-phase 533MVA transformers are not readily replaceable, and, as such, increase security risk due to lag time in replacement, particularly if multiple replacements were needed in the case of a natural disaster or malicious attack.

[1] DEIR at 1-6 to 1-7, State Water Resources Control Board Resolution No. 2013-0018.
[2] DEIR at 1-6.

- For a single transformer unit failure, SCE would need to procure an extra transformer as a back-up to be stored on site, which would increase the transformer bank area beyond what would be required for just three transformers.
- For security reasons and to mitigate the long lead time, SCE would also need to procure three additional spares to be stored in a different location, for rapid restoration of multiple unit loss. Therefore, a total of 4 additional transformers would be required (1 to be stored on-site and 3 to be stored off-site).
- Electrical power flows would be negatively affected by the single transformer configuration versus a multiple transformer configuration, jeopardizing reliable operation.

Second, the DEIR's analysis of alternatives incorrectly concludes that the One-Transformer Bank (1600 MVA) Substation, the Two -Transformer Bank (1120 MVA) Substation, and the Gas Insulated (GIS) Substation would achieve most of the basic project objectives. This is incorrect. As explained in detail below, all three alternatives fail to meet basic CPUC and SCE project objectives regarding the OTC policy date of December 31, 2020 and the One-Transformer and Two-Transformer alternatives also fail to meet project objectives regarding NERC/WECC requirements and reliability concerns.

Third, the DEIR's comparison of the Proposed Project's potential environmental impacts and the alternatives' environmental impacts is flawed. The DEIR analysis overlooks additional soil import needs and air quality and traffic impacts that would result from a reduction in on-site grading due to the reduction of the substation footprint under all three alternatives. All three alternatives fail to account for additional air quality impacts and traffic impacts related to supplementary soil import that would be needed if any reduced footprint option were chosen. Further, any other reduction of other impacts would be, per the DEIR, "negligible" or "slight."

Fourth, the DEIR contains certain mitigation measures that should be deleted because they are infeasible or inapplicable.

For these reasons, the Final EIR should dismiss the One-Transformer, Two-Transformer, and Gas-Insulated Substation Alternatives from consideration because all three fail to meet basic CPUC and SCE Project Objectives, none substantially reduce significant environmental effects as compared to the Proposed Project (and are thus not environmentally superior), and the One-Transformer Alternative is not technically feasible. The Final EIR should also delete infeasible or inapplicable mitigation measures.

II. LEGAL STANDARDS GOVERNING THE ANALYSIS OF ALTERNATIVES IN A DEIR

As noted in the DEIR, the California Environmental Quality Act (Pub. Resources Code § 21000 *et seq*., CEQA) and its implementing Guidelines (14 CCR § 15000 *et seq*.) 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…." (14 CCR § 15126.6(a); DEIR, at p. 3-2.)

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." (Pub. Resources Code § 21081(a)(3).) 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." (Pub. Resources Code § 21061.1; 14 CCR § 15364.)

III. THE DEIR'S ANALYSIS OF THE ONE-TRANSFORMER (1600 MVA) SUBSTATION ALTERNATIVE IS FLAWED

The One-Transformer Alternative should be dismissed from consideration because it is not technically feasible, does not meet basic CPUC or SCE Project Objectives for several reasons, and is not environmentally superior to the Proposed Project.

A. The One-Transformer (1600 MVA) Substation Alternative Is Not Technically Feasible.

The One-Transformer Alternative does not comply with SCE's Project Objective 7, submitted in the Proponent's Environmental Assessment (PEA) but omitted in the DEIR, to design and construct the Proposed Project in accordance with SCE's approved engineering, design and construction standards. SCE's objective was not incorporated into the DEIR CPUC objectives "…because it does not speak to the underlying purpose of the project."[3] To the contrary, utilizing SCE standards will enable the project to facilitate compliance with OTC requirements and meet project objectives on time with the least environmental impact. SCE standards are developed based on experience to ensure SCE constructs safe, reliable, and operable facilities on a consistent basis. The use of standard-sized equipment also allows for long-term efficiencies to be gained in foundation design, maintenance procedures, and the ability for spare equipment to be utilized at many different locations, including sharing of equipment between utilities in emergency situations, as evidenced by the large participation rates in the Spare Transformer Equipment Program (STEP) that is managed by the Edison Electric Institute (EEI).

SCE does not currently have a standard design for a 1600 MVA transformer bank, nor is SCE aware that such equipment is utilized in California or nationally as standard equipment. The One-Transformer Alternative proposed by the CPUC would consist of three 533 MVA single-phase transformers.

The three 1120 MVA transformer banks specified in the Proposed Project would each consist of three 373 MVA single-phase transformers per transformer bank. By comparison, each

[3] DEIR at 1-4.

transformer in the One-Transformer Alternative would be approximately 40% larger in volume than the Proposed Project's transformer bank and would result in higher current flow towards the 220 kV switchrack. The calculated current flow on the 220 kV side of a 1600 MVA transformer bank exceeds 4000 Amps, which would require installation of 5000 Amp circuit breakers and disconnect switches. If studies show that the short circuit duty on the 220 kV switchrack exceeds 63 kA, which is likely given the 220 kV lines would be on a common bus, then 80 kA circuit breakers would be needed, which are not industry-standard size. Even if 220 kV 5000 Amp circuit breakers and disconnect switches could be procured, it is reasonable to expect that the schedule to obtain that equipment would be significantly longer than what would be necessary to specify, procure, and receive the standard 4000 Amp equipment that is required for the Proposed Project. These schedule impacts could result in impacts to the overall project in-service date.

Inclusion of non-standard equipment, such as the 533 MVA transformer banks and 5000 Amp circuit breakers, also creates operations and maintenance concerns as this equipment would be the only such units on the SCE system. Therefore, in addition to the aforementioned technical issues, SCE would likely need to procure more than one spare 533 MVA single-phase transformer due to the long procurement lead time and the unavailability of system spares for this unique transformer size. Spare circuit breakers and disconnects may also be purchased for similar reasons. Some of this spare equipment would need to be stored on-site at Mesa Substation and off-site for location diversity, to facilitate rapid restoration. Consequently, additional space would be required within the substation that was not apparently considered in the rough schematic of this alternative as shown in Figure 3.4-1.[4]

The larger physical size of the alternative transformer bank presents several other technical challenges. Transporting these larger-sized 533 MVA transformer bank units to the project site would likely require use of larger-than-normal trucks and increased lane closures as compared to other transformer bank shipping protocols, resulting in an impact to Traffic and Transportation that was not identified in the Comparison of Alternatives Section 5.3.2.1. The larger transformer bank would also necessitate changes to the standard substation layout to accommodate the increased length, width, and height of each transformer bank, and the additional spare units would require additional space within the transformer bank area for storage.

Implementing this alternative as suggested with only one transformer bank would also change the number of required positions in the 220 kV switchrack, not just the 500 kV switchrack and transformer bank areas, thereby resulting in the need to redesign the entire 220 kV switchrack. It is anticipated that the redesign effort needed to incorporate the One-Transformer Bank (1600 MVA) Substation Alternative would require approximately 9-12 months to modify not only the

[4] SCE requested additional interior design concepts for each alternative beyond the rough schematics provided in Figures 3.4-1, 3.4-2, and 3.4-3, but the author of the DEIR was unable to provide such details. Therefore, some design conclusions are based on SCE's assumptions for what would be needed to accomplish each alternative.

electrical design of both the 500 kV and 220 kV switchracks, as well as the transformer bank areas, but also the overall site grading design to match the new substation layout. Considering that the construction of the 220 kV switchrack is one of the critical activities to be performed during Phases 1 and 2 of the overall construction sequencing, and must be completed prior to demolition of the existing substation in order to clear an area sufficient to build the 500 kV switchrack, the overall schedule impacts resulting from this redesign effort would significantly jeopardize the successful completion of this project by the required in-service date.

B. The One-Transformer (1600 MVA) Substation Alternative Does Not Meet Basic CPUC Project Objectives.

The One-Transformer (1600 MVA) Substation Alternative does not meet CPUC Project Objectives 1 or 2.

CPUC Project Objective 1 is to:

> *Address projected violations of NERC Standard TPL-001-04, WECC Regional Business Practice TPL-001-WECC-RBP-2, and CAISO Planning Standards that would occur upon retirement by December 31, 2020, of generators that use OTC.*

The One-Transformer Alternative does not address projected violations of NERC TPL-001-4 under all contingencies included in Appendix B of the DEIR, "Violations of NERC WECC and CAISO Standards." For contingencies 4 and 5, transmission lines in the Serrano Corridor are loaded to 98%.[5] However, the analysis performed by ELCON in the DEIR assumed 500/220 kV transformer bank impedance that is lower than the minimum impedance per SCE standards, and perhaps below what is readily available from the equipment suppliers. The case SCE provided to ELCON included a higher impedance for the transformer bank associated with the Proposed Project, in accordance with SCE standards. Increasing the transformer bank impedance consistent with SCE standards would divert power from the Western portion of SCE's transmission system to the Eastern portion thereby increasing loading on the Serrano Corridor. This increased flow under contingencies 4 and 5 would cause post-contingency loading levels that reach or exceed the emergency rating of critical lines in the Serrano Corridor. Higher transformer bank impedances or slight changes in generation dispatch would further exacerbate the thermal loading resulting in violation of CPUC Objective 1.

SCE must ensure current flows are in compliance with NERC TPL 001-4 standards under a range of load and generation patterns. Transformer bank impedance is a critical parameter that impacts current flow on the electric system. Under the One-Transformer Alternative, a specific transformer bank impedance was modeled by ELCON in an attempt to fine-tune these flows and avoid overloads. With this single transformer bank, under the lower impedance value used, the transformer bank reaches its emergency rating following a contingency. Higher impedances

[5] DEIR Appendix B.

cause the heavily loaded Serrano Corridor to reach its emergency rating following a contingency. Therefore, the One-Transformer Alternative is inadequate.

In addition to violating TPL-001-04, the technical challenges associated with the design, testing and procurement process for a 1600 MVA transformer bank would cause significant delays to the project schedule resulting in the inability to meet the December 31, 2020 OTC retirement date requirements per CPUC Objective 1. The normal lead time for procuring a standard transformer bank is approximately 24 months. Per the current project schedule, SCE would need to order transformers banks for the Proposed Project in early 2017 in order to meet the online date of December 31, 2020. Due to the non-standard nature of these transformer banks, the procurement time for a 1600 MVA transformer bank is likely to be closer to 36 months. Therefore, even if SCE ordered the 1600 MVA transformer in early 2017, it would not likely arrive until early 2020. In addition to the long lead-time, the larger, non-standard 1600 MVA transformer bank would require a redesign of the substation configuration as well as the 220 kV switchrack due to nonstandard terminal equipment/breakers for 5000 Amp. This redesign would add approximately 9-12 months to the project completion time, thereby likely missing the December 31, 2020 online date to meet OTC retirement requirements. If, as a result of this delay, generating facilities are required to maintain operation beyond the OTC compliance date, the environmental impacts associated with their operation would continue until such time as the Mesa Project is ultimately completed.

The One-Transformer Alternative also violates CPUC Project Objective 2:

> *Avoid introduction of new violations of NERC, WECC, and CAISO standards.*

The One-Transformer Alternative would introduce additional thermal overloads outside of those included in Appendix B to the DEIR and therefore violates CPUC Objective 2. SCE noted a specific contingency, which was not included in Appendix B, in response to Data Request ED-SCE-06 Question 2a:

> An N-2 of the Rio Hondo – Vincent #1 & 2 230 kV transmission lines would cause a single transformer to be loaded to 1698 MVA[6]

In the case provided by ELCON[7], the transformer bank impedance was lower than that modeled by SCE. In ELCON's case, under an N-2 of the Rio Hondo – Vincent #1 and 2 220 kV transmission lines, the 1600 MVA transformer bank loading reaches the 1920 MVA emergency rating of the transformer bank. As SCE stated in response to Data Request ED-SCE-06, different dispatch scenarios would increase loading on the 1600 MVA transformer bank:

> Furthermore, the case provided is one snapshot of future operating conditions. With the recent passage of Senate Bill 350, the state renewable energy target has increased from

[6] This value was based on SCE's modeled impedance.
[7] Cases provided in response to SCE's Data Request (5/16/2016) Question 1a.

> 33% to 50%, which will likely result in new generation connecting to the system. While SCE cannot predict exactly where new renewable generation would be located, generation connecting north of Vincent Substation would further exacerbate transformer bank loading at Mesa Substation.[8]

Thus, the lower impedance modeled by ELCON in combination with a different generation dispatch amount results in an overload of the transformer bank causing the One-Transformer Alternative to violate Objective 2.

The violations of CPUC Objective 1 and Objective 2 demonstrate the interconnected nature of the transmission system and the balancing required to maintain reliability. Under SCE's modeled impedance value, a single transformer bank results in NERC TPL 001-4 violations on the Serrano corridor while utilizing the lower impedance studied by ELCON results in Mesa transformer bank overloading. Neither option is an adequate alternative.

C. The DEIR Disregards Critical SCE Project Objectives in Analyzing the One-Transformer Alternative.

i. The One-Transformer Alternative degrades reliability.

SCE's Objective 1 was:

> *Provide safe and reliable electrical service.*

The One-Transformer Alternative requires the immediate implementation of a Remedial Action Scheme (RAS), which is less reliable than the Proposed Project. A RAS is typically narrowly focused and is designed to only address a prescribed set of contingencies and conditions. The Proposed Project provides transmission capacity continuously to enable power to be safely re-routed not only for studied contingencies, but also for other more severe events. Therefore, the Proposed Project provides improved reliability for other contingencies outside the specific set that would be monitored by the proposed RAS. This allows the Proposed Project to guard the system against additional unexpected scenarios, not anticipated in planning studies. Depending upon real-time system needs, such as maintenance or extended outages, this improved reliability is important. Typical RAS implemented on the SCE system trip either generation or load in response to a pre-defined set of contingencies. The RAS proposed in this Alternative (Proposed RAS) disables transmission lines and weakens the system.

<u>Order of Events Involving the Proposed RAS</u>

[8] Data Request ED-SCE-06 Question 2a.

- Outage of the Chino – Mira Loma No. 1 220 kV transmission line followed by an outage of the Chino – Mira Loma No. 2 220 kV transmission line resulting in a thermal overload of the Chino – Mira Loma No. 3 220 kV transmission line
- Proposed RAS disables two additional 220 kV transmission lines (Barre – Lewis and Barre – Villa Park) to relieve overload

Under the Proposed Project, two transmission lines are lost due to the contingency (Chino-Mira Loma No.1 and No. 2 lines), yet continuity of service to load in the Western LA Basin via the Serrano Corridor is maintained. On the other hand, implementation of the Proposed RAS results in disabling two additional 220 kV transmission lines (Barre-Lewis and Barre-Villa Park) which also serve load in the Western LA Basin, cutting off the entire Serrano Corridor. The inclusion of the RAS as a part of the One-Transformer Alternative degrades reliability and reduces import capabilities.

ii. *The One-Transformer Alternative disregards future needs of the Western LA Basin.*

SCE's Objective 3 for the proposed Mesa Project was:

> *Allow greater flexibility in the siting of future generation projects to meet local reliability needs in the Western Los Angeles Basin while reducing the total amount of new generation required by providing additional transmission import capability.*

In developing its basic project objectives, the CPUC eliminated SCE's above objective with limited rationale.[9] By solely focusing on specific contingencies rather than the overarching system need for the project, the CPUC has minimally addressed system needs with little consideration for the future. As noted in SCE's PEA:

> The construction of the Proposed Project provides an additional point of 500 kV service into SCE's metropolitan load center delivering power from Tehachapi wind resource area or resources located in Pacific Gas and Electric service territory or the Northwest via the 500 kV bulk transmission network.[10]

In contrast, the One-Transformer Alternative would represent a 50% reduction in nameplate power delivery capability via Mesa Substation (one-1600 MVA transformer bank compared to three-1120 MVA transformer banks). Further, the feasibility of the One-Transformer Bank Alternative is predicated on reliability of gas-fired resources in the LA Basin to operate at maximum capacity. As demonstrated in Appendix B, the CPUC's proposed One- Transformer Alternative results in the post-contingency loading in the Serrano Corridor to 98% of emergency rating. As such, future changes in power flow patterns, as well as further reduction of generation

[9] DEIR at 1-4.
[10] SCE PEA Page 2-4.

resources in the Western Los Angeles Basin, would cause these highly loaded transmission lines to overload. One such potential system change is exemplified by the limited operations of the Aliso Canyon Gas facility, which may result in gas shortages in the Western LA Basin. Under this alternative, even a minor reduction in gas-fired resources would create thermal overloads. This would require implementation of additional measures to mitigate these potential overloads, whereas the Proposed Project provides flexibility to address future system needs.

Furthermore, reducing the substation footprint as suggested under the One-Transformer Alternative would also limit future grid expansion. The substation design was based on an ultimate configuration that would allow for additional transformer banks and 500 kV transmission lines should they be determined necessary in the future. To limit the substation footprint would limit the ability for these grid assets to be included in the future, hindering system expansion for both reliability projects as well as generators seeking to connect via the CAISO's interconnection queue. Reducing the footprint, would result in escalated costs and increased environmental impacts to expand the site in the future. Fully expanding the site to SCE's Proposed Substation layout is necessary regardless of the alternative selected to minimize future environmental impacts and limit costs.

D. The DEIR's Identification of the One-Transformer Alternative As the Environmentally Superior Alternative is Flawed.

The DEIR asserts that the One-Transformer Alternative is considered environmentally superior in nine resource areas.[11] However, the One-Transformer Alternative does not substantially reduce environmental impacts. As noted above, CEQA requires 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…."[12] According to the DEIR, the Proposed Project has significant and unavoidable impacts in three areas: (1) aesthetics, (2) air quality, and (3) noise. The One-Transformer Alternative does not avoid or substantially lessen these significant impacts. In fact, the One-Transformer Alternative *increases* air quality impacts by adding truck trips and construction time, and Air Quality is the *only* significant and unavoidable impact area that the One-Transformer Alternative was ranked first in as compared to the other alternatives.[13] Further, per the analysis in the DEIR, any other "reductions" to impacts in other resource areas, all of which are determined to already be less-than-significant, either with or without mitigation, either do not substantially lessen significant environmental effects or are largely deemed to be "negligible" or "slight" or "substantially the same" as compared to the Propose Project. In short, the One Transformer Alternative is not environmentally superior to the Proposed Project.

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[11] DEIR at 5-22.
[12] 14 CCR § 15126.6(a); DEIR, at p. 3-2.
[13] The DEIR ranks the GIS Alternative higher than the One-Transformer Alternative for reductions in both aesthetics and noise. DEIR at 5-7 to 5-9.

i. *The One-Transformer Alternative results in an increase to air quality impacts as compared to the Proposed Project.*

According to the DEIR, the One-Transformer Alternative would result in total reduced air quality impacts over the construction period because the reduced substation footprint of about 11.6 acres would result in a shorter construction period and less ground disturbance, presumably because it would require less grading.[14] Also, according to the DEIR, although daily pollutants would be about the same as the Proposed Project, the reduced construction period would result in overall substantial decrease in total exhaust emissions and substantially reduce fugitive dust emissions from ground disturbance.[15] This analysis is flawed because it fails to take into account the fact that the One-Transformer Alternative grading requirements for the remainder of the Mesa Substation construction area would still need additional soil imports to balance the site, soil that under the Proposed Project would have come from the grading work over a portion of the 11.6 acres[16] (as part of Phase 3).

Therefore, reduction of the proposed substation footprint by 11.6 acres actually *lengthens* the construction period and *increases* the total in exhaust emissions. Per Table 2-7 of the project description,[17] Phase 3 grading quantities included 50,000 cubic yards (CY) of exported soil based on the SCE Proposed Project. This represents approximately 5,000 truck trips for Phase 3. The topography within the 11.6 acres is significantly higher in elevation than the proposed future grades of the new substation; this accounts for approximately 150,000 CY of cut. As calculated, the Proposed Project would use 100,000 CY of the soil cut in this area to serve as fill on the rest of the project site, and export 50,000 CY (approximately 5,000 truck trips). If the Phase 3 grading does not take place as planned in the Proposed Project, the project site would still need approximately 100,000 CY of fill.[18] So, if Phase 3 did not include this grading work, then the grading quantities in Table 2-7 would change from 50,000 CY of export to 100,000 CY of import, approximately 10,000 truck trips. This would double the amount of truck trips for Phase 3 (from 5,000 export to 10,000 trips for import) required to grade the site for construction of the One-Transformer Alternative and would therefore bring the total truck trips to 20,000 for Phases

[14] DEIR, Table 5.3-1 and Figure 5-1 at 5-3 and 5-5.
[15] DEIR at 5-4.
[16] It should be noted that of the 11.6 acres approximately 2 acres are not included in the ruderal hillside, but are located east of the existing substation, adjacent to Greenwood Avenue. As described in the attached comment table, a revised figure 2-4 has been provided which reflects the current engineering design with the Operations building and Test and Maintenance Building relocated in the northeast corner of the substation. This area would be graded for construction of these buildings regardless of which project configuration is selected.
[17] DEIR at 2-55.
[18] In other words, the Cut Quantity for Phase 3 would be reduced from 375,000 CY to 225,000 because of the decrease of 150,000 CY of cut. Phase 3 needs 325,000 CY of fill: (325,000 CY needed- 225,000 CY available= 100,000 CY needed for import).

1-3, as compared to 15,000 trips per Table 2-7 for the Proposed Project, an *increase* of 5,000 truck trips.[19]

With regards to the project duration, the conventional construction equipment that was proposed to be used in the SCE Proposed Project (e.g., scrapers) can move the soil on site approximately ten times faster than it can be imported using trucks. This means that the project duration would be extended by more than 6 months under the One-Transformer Alternative, not shortened. This could compromise the ability to complete the project by December of 2020.

As such, the impact to the total exhaust emissions are greater than the Proposed Project, and the One Transformer Alternative would result in a longer construction period by at least 6 months. For these reasons alone, the One-Transformer Alternative is not environmentally superior to the Proposed Project.

ii. *The One-Transformer Alternative does not substantially lessen impacts to any other resource area.*

For the bulk of the analysis, the DEIR concludes that the One-Transformer Alternative would only have a "slight" or "negligible" or "substantially the same" impact as compared to the Proposed Project (e.g., for Aesthetics, Cultural Resources, Geology, GHG, Hydrology, Land Use, Noise, Population and Housing, Public Services, and Recreation). For other resource areas where the DEIR concludes a greater reduction in impacts, such as in Biological Resources, Traffic and Hazards, that analysis is flawed.

For Biological Resources, the DEIR assumes that the 11.6 acres avoided under the One-Transformer Alternative consists of "higher-value habitat" because "special-status bird species (including California coastal gnatcatcher) are known to occur within this habitat."[20] The 11.6 acres, proposed to be avoided, is ruderal with exotic non-native plant species,[21] not mature coastal sage scrub that would be consistent with higher value habitat for the gnatcatcher. Further, there has not been any documentation of successful nesting of special-status bird species within the 11.6 acres,[22] which includes four years of data from the Tehachapi Renewable Transmission Project (TRTP) and technical surveys for TRTP and Mesa.[23]Additionally, the mulefat scrub

[19] SCE's original calculation for grading truck trips, as submitted with its PEA, estimated 30,000 truck trips as a result of grading activities. SCE updated this estimate, as reflected on Table 2-7 in the DEIR to a total of 15,000 truck trips. However, it should be noted that the Air Quality Calculations used as the basis for the Air Quality analysis in the DEIR used the outdated 30,000 truck trips originally submitted.
[20] DEIR at 5-10.
[21] Figure 4.3-1 and Table 4.3-1 of the DEIR, Figure 5 of Appendix D of the DEIR.
[22] Figure 5 of Appendix D of the DEIR.
[23] Figure 5 of Appendix D of the DEIR.

within this area is not habitat for least Bell's vireo[24] and the latter has not been documented on the Mesa substation site,[25] only within the adjacent nursery on the 500-kV transmission line location, documented once, and only during migration. Therefore, the One-Transformer Alternative would not substantially lessen biological impacts. In addition, higher valued habitat, coastal sage scrub, would still be impacted in the One-Transformer Alternative (*i.e.* grading for 220 kV and 66 kV tower pads, general grading/soil transfer for leveling the site, and grading for drainage installation). SCE and Army Corps are consulting with the USFWS to obtain the appropriate permits.

Also, contrary to the DEIR analysis, the One-Transformer Alternative will not substantially lessen traffic impacts. The DEIR analysis is based on the assumptions discussed above, that this alternative would result in a shorter construction duration and fewer truck trips. As explained above, the duration would actually be longer, and significantly more truck trips would be required to deliver the substantial quantity of fill soil than the Proposed Project. Therefore, the One-Transformer Alternative would not substantially lessen traffic impacts, but would increase them as compared to the Proposed Project.

Finally, the DEIR seems to conclude that having less oil stored on site, as a result of fewer transformer banks being installed, results in a substantial reduction in the potential for hazardous impacts. However, this conclusion is flawed because the likelihood of a catastrophic release of oil is a function of appropriate safeguards in place to manage and control such releases. The requirements of an operational Spill Prevention, Control, and Countermeasure (SPCC) Plan only anticipate a release of oil from the largest single container, not a coincident release from all containers located at the site. In the case of this alternative, the individual transformer units would likely be approximately 40% larger by volume than the transformer banks required under the Proposed Project, meaning that each one would likely contain that much more oil as well. Therefore, there is actually a potential for more oil to be released under the One-Transformer Alternative than there would be under the Proposed Project, which is an opposite conclusion than what is drawn in the DEIR.

IV. THE DEIR'S ANALYSIS OF THE TWO-TRANSFORMER (1120 MVA) SUBSTATION ALTERNATIVE IS FLAWED

A. The Two-Transformer (2-1120 MVA) Substation Alternative Does Not Meet CPUC Project Objectives.

The Two-Transformer (2-1120 MVA) Substation Alternative does not meet CPUC project Objective 1. CPUC Project Objective 1 is to:

[24] April 9, 2015 SCE Letter to USFWS. RE: Southern California Edison Company's Mesa Substation Project – least Bell's Vireo Potential Habitat and Permitting; USFWS response/communication, Jonathan Snyder, April 15, 2015.
[25] Figure 5 of Appendix D of the DEIR.

Address projected violations of NERC Standard TPL-001-04, WECC Regional Business Practice TPL-001-WECC-RBP-2, and CAISO Planning Standards that would occur upon retirement by December 31, 2020, of generators that use OTC.

In the power flow case study provided to SCE by ELCON, the 220 kV bus configuration was altered as compared to the Proposed Project. The Proposed Project operates the 220 kV bus in a split configuration to prevent short circuit duty from exceeding the rated capabilities of the standard 220 kV circuit breaker. According to the power flow case provided by ELCON, however, the 220 kV bus tie breaker was closed with one transformer bank connected on either side of that circuit breaker, which results in excessive short circuit duty values on the switchrack when combined with the contributions from all twelve 220 kV transmission lines connected to that switchrack. When the tie breaker was opened to alleviate the short circuit duty issue, it resulted in one of the 500/220 kV transformer banks reaching its normal rating of 1120 MVA. Just a slight modification in the renewable generation dispatch assumption or generation capacity in the Western LA Basin would cause an overload condition. Due to this thermal transformer overload the Two-Transformer Alternative fails to satisfy CPUC Objective 1. Further, similar to the effect on the One-Transformer (1600 MVA) Substation Alternative, implementing this alternative as suggested with two transformer banks would also change the number of required positions in the 220 kV switchrack, not just the 500 kV switchrack and transformer bank areas, thereby resulting in the need to redesign the entire 220 kV switchrack. It is anticipated that the redesign effort needed to incorporate the Two-Transformer (1120 MVA) Substation Alternative would require approximately 9-12 months to modify not only the electrical design of both the 500 kV and 220 kV switchracks, as well as the transformer bank areas, but also the overall site grading design to match the new substation layout. Considering that the construction of the 220 kV switchrack is one of the critical activities to be performed during Phases 1 and 2 of the overall construction sequencing, and must be completed prior to demolition of the existing substation in order to clear an area sufficient to build the 500 kV switchrack, the overall schedule impacts resulting from this redesign effort would significantly jeopardize the successful completion of this project by the required in-service date.

B. The Two-Transformer (2-1120 MVA) Substation Alternative Does Not Meet SCE Project Objectives.

The Two-Transformer Alternative degrades reliability. SCE's Objective 1 was:

Provide safe and reliable electrical service.

As with the One-Transformer Alternative, the Two-Transformer Alternative ignores SCE's objective of providing safe and reliable electrical service due to reliance on a RAS. As stated above, implementation of the proposed RAS results in the loss of four 220 kV transmission lines which serve load in the Western LA Basin, including cutting off the entire Serrano Corridor. This degrades reliability and reduces import capabilities.

Furthermore, the CPUC DEIR states that the two transformers would be

> connected in parallel and switched as one. In the event that one transformer bank failed, the other transformer bank would automatically go out of service. If both transformers were taken out of service due to failure of one transformer bank, there would not be an outage. Instead the grid would operate as if the substation was not in place.[26]

This statement is incorrect. If a transformer bank failed and both were taken out of service, this *would* be an outage. As concluded in the CPUC's own analysis of the No Project Alternative, without an outage, if the grid operated as if the substation were not in place, violations of NERC TPL-001-4 criteria would result. The statement cited above from the DEIR recommends designing the system so that a fault affecting a single transformer bank results in the loss of the entire 500/220 kV transformation at Mesa Substation. This further represents the degraded reliability provided by this Alternative in comparison to the Proposed Project.

C. The Two-Transformer Substation Alternative is Not Environmentally Superior to the Proposed Project.

The DEIR concludes that the Two-Transformer Alternative is environmentally superior to the Proposed Project. This is incorrect. The rationale stated above regarding the flawed environmental analysis of the One-Transformer Alternative similarly applies to the Two-Transformer Alternative. The only difference here is that in addition to creating more truck trips and increasing impacts to air quality as compared to the Proposed Project and the other flawed comparison analysis discussed above, any other purported potential reduction of impacts for this Alternative are even less than the One-Transformer Alternative due to the 8.3-acre reduction as compared to the 11.6-acre reduction.

V. THE DEIR'S ANALYSIS OF THE GAS-INSULATED (GIS) SUBSTATION ALTERNATIVE IS FLAWED

A. The GIS Substation Alternative Does Not Meet CPUC Project Objectives.

The GIS Alternative does not meet CPUC project Objective 1. CPUC Project Objective 1 is to:

> *Address projected violations of NERC Standard TPL-001-04, WECC Regional Business Practice TPL-001-WECC-RBP-2, and CAISO Planning Standards that would occur upon retirement by December 31, 2020, of generators that use OTC.*

If the GIS Substation Alternative were selected, SCE would need to significantly redesign the substation layout to modify not only the electrical design of all new GIS switchracks, as well as the transformer bank areas, but also the overall site grading design to match the new substation layout. This re-design would also most likely dramatically change the entire construction sequencing plan because different grading requirements would be needed in order to install the new GIS switchracks before other substation equipment is installed on the site. In addition, this

[26] DEIR at 3-10.

re-design would necessarily be preceded by the procurement process to contract with a GIS equipment vendor. The details of each different vendor's equipment and layout would likely have a significant impact on the way that individual transmission line and transformer bank connections would be accomplished. These procurement and re-design efforts would result in an overall schedule delay of approximately 12-24 months and therefore result in not being able to successfully meet the December 31, 2020 online date.

B. The GIS Substation Alternative Is Not Environmentally Superior To The Proposed Project.

The DEIR also concludes that the GIS Substation Alternative is environmentally superior to the Proposed Project. For all the reasons discussed above for the One-and Two-Transformer Alternatives, the GIS Substation environmental analysis is also similarly flawed, except here, the purported "savings" in acreage diminishes to just 7.3 acres. In addition, the DEIR concludes that whatever impact decreases might be gained by this alternative, those purported decreases "do not outweigh the substantial increase in long-term greenhouse gas emission increase the GIS Alternative would cause compared to the proposed project and to the other alternatives considered." [27] Therefore, the GIS Substation Alternative is not environmentally superior to the Proposed Project.

VI. THE DEIR CONTAINS ERRONEOUS AND INFEASIBLE MITIGATION MEASURES THAT SHOULD BE DELETED

A. Mitigation Measure Hydrology-6 Should Be Deleted Because The Mesa Substation Site Is Not Within A Dam Inundation Area.

The DEIR erroneously concludes that the Mesa Substation site is located in a dam inundation area.[28] Mitigation Measure Hydrology -6 (HY-6) would require SCE to install dam inundation protection measures into the substation design, which could include a concrete perimeter wall and flood gates at entry ways, elevation of substation equipment, and sealing equipment buildings.

SCE reviewed the City of Monterey Park General Plan (2001) section related to the potential failure of the north and south dams surrounding the Garvey Reservoir.[29] In particular, Figure SCS-4 (Flood Inundation Area: Garvey Reservoir and Laguna Basin), shows the Main Project Area is not within any inundation area as depicted in Figure SCS-4, showing the correct location of the substation.

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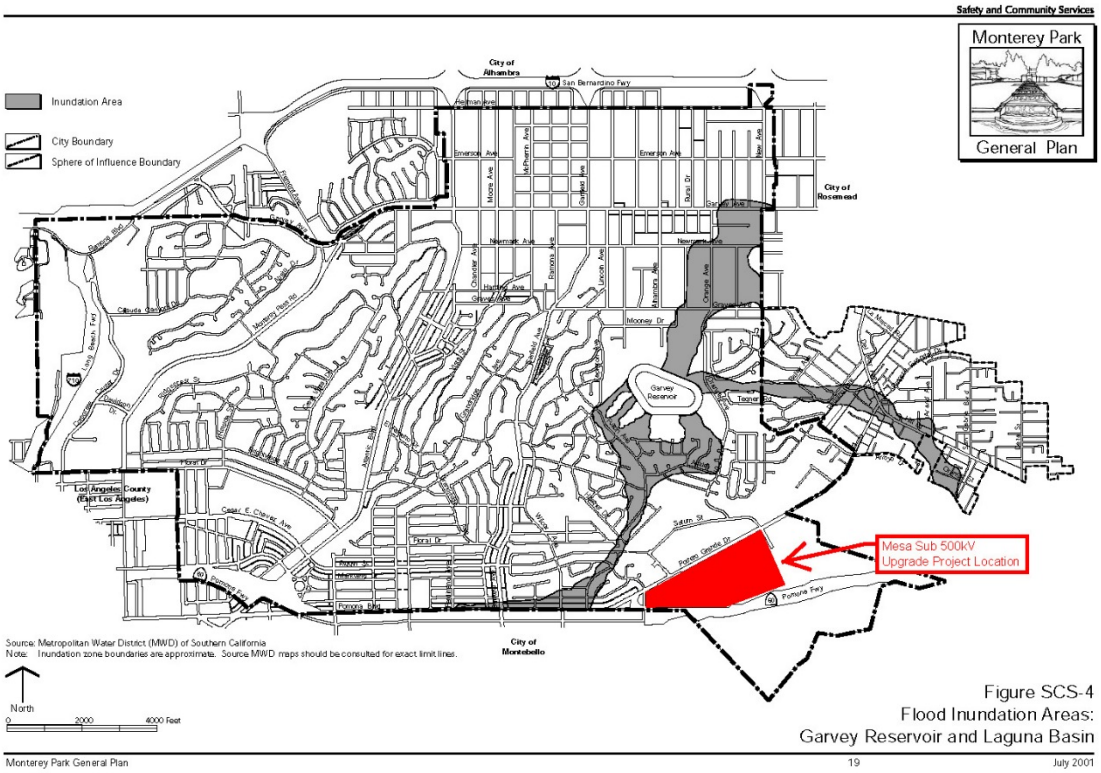
[27] DEIR at 5-23.
[28] DEIR at 4.8-27.
[29] City of Monterey Park General Plan (2001): http://www.cityofmpk.org/484/Baseline-Noise-Environment; Figure SCS-4, Flood Inundation Area: Garvey Reservoir and Laguna Basin: http://www.cityofmpk.org/DocumentCenter/View/1078



The Mesa Substation and nearby telecommunications, transmission, subtransmission, and distribution infrastructure would not be located in the inundation area of the Garvey Reservoir. Therefore, Mitigation Measure HY-6 is inapplicable and should be deleted.

B. Mitigation Measure Noise-2 Should Be Deleted Because It Is Impossible To Achieve.

Mitigation Measure Noise-2 requires the Mesa Substation Project comply with the Monterey Park noise ordinance nighttime noise standard of 50-dBA in relation to the closest receptor.[30] As noted in the DEIR, the ambient noise level in the vicinity of the nearest receptor is 52-dBA, average 8-hour dBA.[31] SCE cannot comply with the mitigation measure as it is written because no mitigation installed on the Project can effectively reduce the existing ambient noise level, not caused by the Project, from 52-to- 50 dBA. SCE will be implementing Mitigation Measure Noise-1, "Noise Control Plan" and will implement noise reduction measures into its design to the extent feasible. Since Mitigation Measure Noise-2 is not possible as written, and since Mitigation Measure Noise-1 requires a Noise Control Plan that will mitigate noise impacts, SCE requests that Noise-2 be deleted from the DEIR.

[30] DEIR at 4.10-23.
[31] DEIR at 4.10-25.

VII. CONCLUSION

The DEIR's analysis of the One-Transformer Alternative, the Two-Transformer Alternative, and the GIS Substation Alternative, is flawed. For the reasons stated above, all three alternatives should be dismissed from consideration. Additionally, the One-Transformer Alternative is technically infeasible, none of the three alternatives meet basic CPUC and SCE project objectives and none substantially lessen environmental impacts as compared to the Proposed Project. The DEIR should be modified to reflect these comments. Further, SCE has identified mitigation measures that are infeasible or inapplicable that should be modified or deleted in the DEIR.

Regards,

/s/ Angela Whatley

Angela Whatley

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
EXECUTIVE SUMMARY			
Table ES-2 Mitigation Measure column	ES-12	MM CR-1 states: **"MM CR-1: Flag and Avoid Known Unevaluated Historic Sites.** Prior to commencement of any construction or construction-related activities within 50 feet of the mapped boundaries of (1) the historic-era debris and concrete structure at site P-19-186889 and (2) the concrete footings and shack at site SAY-S-1, a qualified CPUC-approved archaeologist shall erect flagging to create a 50-foot buffer around these resources. Flagging shall be in a bright, easily visible color, and signs shall be posted at the perimeter of the flagged areas on all sides to indicate that construction equipment, materials, and personnel shall stay out of the flagged areas. Flagging and signage shall stay in place until all construction activities within 50 feet of the resources has been completed."	Rationale: Please change buffer dimension from 50 feet to 10 feet to be consistent will the 10-foot buffer dimension stated in Chapter 4.4 Cultural and Paleontological resources on page 4.4-25 Line 5 and page 4.4-26 Line 21-22. Please add language stating that if the resource elements are found to not be historical resources or do not contribute to the eligibility of a historical resource then no additional management (i.e., erecting flagging) of the resource is needed during construction. SCE recommends the following edits: **"MM CR-1: Flag and Avoid Known Unevaluated Historic Sites.** Prior to commencement of any construction or construction-related activities within ~~50~~ 10 feet of the mapped boundaries of (1) the historic-era debris and concrete structure at site P-19-186889 and (2) the concrete footings and shack at site SAY-S-1, a qualified CPUC-approved archaeologist shall erect flagging to create a ~~50~~10-foot buffer around these resources. Flagging shall be in a bright, easily visible color, and signs shall be posted at the perimeter of the flagged areas on all sides to indicate that construction equipment, materials, and personnel shall stay out of the flagged areas. Flagging and signage shall stay in place until all construction activities within ~~50~~ 10 feet of the resources has been completed. If the historic-era debris and concrete structure at site P-19-186889 are evaluated and found not to be a historical resource or do not contribute to the eligibility of a historical resource, no further management is required during construction. If the concrete footings and shack at site SAY-S-1 are evaluated and found not to be a historical resource or do not contribute to the eligibility of a historical resource, no further management is required during construction."</u>
Table ES-2 Mitigation Measure column	ES-12-13	First paragraph of MM CR-3 states: **"MM CR-3: Previously Unidentified Cultural Resources.** If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an "environmentally sensitive area." Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/archaeologist qualified archaeologist and the CPUC shall be notified immediately."	Rationale: Please include notification of SCE to allow for efficient coordination. SCE recommends the following edits: **"MM CR-3: Previously Unidentified Cultural Resource**s. If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an "environmentally sensitive area." Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/~~archaeologist~~ qualified archaeologist<u>, SCE,</u> and the CPUC shall be notified immediately."
Table ES-2 Mitigation Measure column	ES-13	Second paragraph of MM CR-3 states: "Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist determines that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. SCE recommends the following edits: "Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural

Section	Page	DEIR Language	SCE Recommended Language
		unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center."	resources specialist/qualified archeologist and SCE determines that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist and SCE shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center."
Table ES-2 Mitigation Measure column	ES-13	First bullet of MM CR-3 states: **"Determination if a resource is an historical resource.** The CPUC-approved cultural resources specialist/qualified archaeologist, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historic resource, the qualified archaeologist shall prepare an Evaluation Plan."	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: **"Determination if a resource is an historical resource.** The CPUC-approved cultural resources specialist/qualified archaeologist and SCE, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historical resource, the qualified archaeologist and SCE shall prepare an Evaluation Plan."
Table ES-2 Mitigation Measure column	ES-13	Second bullet of MM CR-3 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 shall 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 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."	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age SCE recommends the following edits: **"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 historical 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 shall 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 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."
Table ES-2 Mitigatio	ES-13	Third bullet of MM CR-3 states: **"Data Recovery Plan.** Data Recovery Plans for historic resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age

Section	Page	DEIR Language	SCE Recommended Language
n Measure column		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 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."	SCE recommends the following edits: **"Data Recovery Plan.** Data Recovery Plans for 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 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."
Table ES-2 Mitigation Measure column	ES-13	MM CR-4 states: **"MM CR-4: Paleontological Resources Monitoring.** Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor all ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-7."	Rationale: Please remove "all" to be consistent with language for MM CR-4 as described on page 4.4-28 Lines 19-22, which does not specify that all ground-disturbing activities within areas of moderate to high potential for paleontological resources will be monitored. Please include reference to the Paleontological Resource Management Plan (PRMP), which will provide details about monitoring and discovery protocols. The PRMP will be reviewed and approved by the CPUC prior to the start of construction. SCE recommends the following edits: **"MM CR-4: Paleontological Resources Monitoring.** Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor ~~all~~ ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources, per the Paleontological Resources Management Plan (APM-CUL-01) reviewed and approved by the CPUC prior to construction. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-~~7~~5."
Table ES-2 Mitigation Measure column	ES-13	First paragraph of MM CR-5 states: **"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 discovery can be avoided and no further impacts will occur, no further effort shall be required."	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. SCE recommends the following edits: **"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 consult with the applicant to determine whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required."
Table ES-2	ES-14	Last paragraph of MM CR-5 states: "If the resource is unique, then work shall remain stopped, and the approved paleontologist shall	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented

Section	Page	DEIR Language	SCE Recommended Language
Mitigation Measure column		consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist determines that another method would provide superior mitigation of impacts to the resource."	effectively. Reference to the cultural resources specialist/qualified archaeologist appears to be a typographical error. SCE recommends the following edits: "If the resource is unique, then work shall remain stopped, and the approved paleontologist shall consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved ~~cultural resources specialist/qualified archeologist~~ paleontologist, in consultation with the applicant, determines that another method would provide superior mitigation of impacts to the resource."
Table ES-2 Mitigation Measure column	ES-23	"Municipal Water District"	Rationale: The Metropolitan Water District is incorrectly referred to as the "Municipal" Water District, when it is not a municipal water district as defined under state law. This same error is made in the DEIR Public Services and Utilities (PS&U) analysis section. SCE recommends the following edits: "~~Municipal~~ Metropolitan Water District"
Table ES-4	ES-29	"Municipal Water District"	Rationale: The Metropolitan Water District is incorrectly referred to as the "Municipal" Water District, when it is not a municipal water district as defined under state law. This same error is made in the DEIR Public Services and Utilities (PS&U) analysis section. SCE recommends the following edits: "~~Municipal~~ Metropolitan Water District"
INTRODUCTION			
1.1.1	1-1 Lines 20-35	"SCE's proposed project is described in the Proponent's Environmental Assessment (PEA) as follows: • Construction of the new 500/220/66/16-kV Mesa Substation and demolition of the existing 220/66/16-kV substation, increasing the substation's footprint from about 22 acres to acres. • Replacement (removal and installation) and modification of transmission lines, subtransmission lines, and distribution structures to accommodate the new 500/220/66/16-kV Mesa Substation. • New telecommunications lines and modifications to an existing line, mostly on existing poles and in existing ducts.	Rationale: These bullets should be added in order to be consistent with scope of work associated with the project. Listing of project components should match other sections of the DEIR. SCE recommends the following edits: • "Installation of a temporary 220-kV transmission structure to connect the Eagle Rock–Mesa 220-kV Transmission Line to Goodrich Substation and maintain a second line of service to the City of Pasadena. • Replacement of an existing 220-kV double-circuit transmission structure supporting the existing Goodrich–

Section	Page	DEIR Language	SCE Recommended Language
		• Temporary modifications to 220-kV equipment at several existing substations to prevent electrical outages during construction. • Relocation of an existing 72-inch water pipe that traverses the substation site. • Electrical and/or telecommunications equipment upgrades at 27 existing substations. • Undergrounding of three spans of overhead streetlight conductor.”	Laguna Bell (future Laguna Bell–Mesa No. 1) and Mesa–Redondo 220-kV Transmission Lines in order to increase the capacity rating of the future Laguna Bell–Mesa No. 1 220 kV Transmission Line.”
PROJECT DESCRIPTION			
Table 2-1	2-9	**Component** **Quantity/Dimensions** “New overhead structures” “24 new TSPs”	Rationale: On Table 2-1: Components of the Proposed Project, please update numbers based on current engineering design. SCE recommends the following edits: **Component** **Quantity/Dimensions** “New overhead structures” “~~24~~ 20 new TSPs, 3 LWS”
Table 2-1	2-9	**Components** “Relocation within Mesa Substation Structural Removal” **Proposed Project Specifications** “Removal of 65 existing 66-kV subtransmission poles”	Rationale: On Table 2-1: Components of the Proposed Project, please update language to reflect correct terminology. Poles and towers are being removed, so structures is the correct term to refer to both. SCE recommends the following edits: **Components** “Relocation within Mesa Substation Structural Removal” **Proposed Project Specifications** “Removal of 65 existing 66-kVsubtransmission ~~poles~~ structures…”
Table 2-1	2-9	**Component** **Proposed Project Specifications** “New overhead structures” “Double-circuit structures:50 to 100 feet high,”	Rationale: On Table 2-1: Components of the Proposed Project, please update numbers based on current engineering design. SCE recommends the following edits: **Component** **Proposed Project Specifications**

Section	Page	DEIR Language	SCE Recommended Language
			"New overhead structures" "Double-circuit structures: 50 to ~~100~~ 130 feet high..."
Table 2-1	2-9	**Component** **Proposed Project Specifications** "New UG structures and conduits" "3.4 miles of trench and 28 new vaults"	Rationale: On Table 2-1: Components of the Proposed Project, please update numbers based on current engineering design increasing mileage of trench for duct banks. Additional trenching is incremental increases to existing trenches based on current engineering design within previously identified disturbance areas. SCE recommends the following edits: **Component** **Proposed Project Specifications** "New UG structures and conduits" "~~3.4~~ 4.2 miles of trench and ~~28~~ 27 new vaults"
Table 2-1	2-9	**Components** "New underground structures and conduits" **Proposed Project Specifications** "13 vaults within Mesa Substation site and 15 vaults"	Rationale: On Table 2-1: Components of the Proposed Project, please update numbers based on current engineering design SCE recommends the following edits: **Components** "New underground structures and conduits" **Proposed Project Specifications** "~~13~~ 17 vaults within Mesa Substation site and ~~15~~ 10 vaults"
Table 2-1	2-9	**North Area: City of Pasadena** **Quantity/Dimensions** "One temporary TSP" **Proposed Project Specifications** • "Install temporary TSP (110 to 140 feet tall) to connect the Eagle Rock-Mesa 220-kV transmission line to Goodrich Substation."	Rationale: Please update language from TSP to temporary structure to reflect SCE's construction methods and to be consistent with Section 2.3.3.2 on Page 2-63. SCE recommends the following edits: **North Area: City of Pasadena** **Quantity/Dimensions** "One temporary ~~TSP~~ structure" **Proposed Project Specifications** • "Install temporary ~~TSP~~ structure (110 to 140 feet tall) to connect the Eagle Rock-Mesa 220-kV

Section	Page	DEIR Language	SCE Recommended Language
			transmission line to Goodrich Substation.”
Table 2-1	2-10	**Telecommunications (Overhead and Underground)** **Proposed Project Specifications** • “Reroute one existing telecommunications line to clear the Mesa Substation Construction area. • Relocate existing overhead and underground telecom lines using five existing vaults and one manhole”	Rationale: Please update numbers based on current engineering design. SCE recommends the following edits: **Telecommunications (Overhead and Underground)** **Proposed Project Specifications** • ~~“Reroute one Sixteen existing telecommunication lines to clear the Mesa Substation Construction area.~~ • Relocate existing overhead and underground telecom lines using ~~five~~ eight existing vaults and ~~one~~ six manholes”
Table 2-1	2-11	**Main Project Area** **Quantity/Dimensions** “18 existing vaults and 5 new vaults; 1.8 miles of new duct bank”	Rationale: Please update numbers based on current engineering design. SCE recommends the following edits: **Main Project Area** **Quantity/Dimensions** “18 existing vaults and ~~5~~ 8 new vaults; 1.8 miles of new duct bank”
2.2.1.1	2-29, Figure 2-4	**Figure 2-4 Proposed Mesa Substation Layout**	Rationale: Please replace the existing **Figure 2-4 Proposed Mesa Substation Layout** with the updated figure attached to this submittal, which more accurately reflects the current engineering design for the substation as well as the other linear elements. In particular, this design reflects the proper location of the relocated Operations Building and the Test and Maintenance Building closer to Greenwood Avenue. SCE recommends the following edits: Replace current **Figure 2-4 Proposed Mesa Substation Layout** with attached updated figure.

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
2.2.1.1	2-32 Lines 26-29	"Access to the proposed Mesa Substation would be provided by new asphalt and/or concrete access driveways from Potrero Grande Drive and East Markland Drive. The main entrance at Potrero Grande Drive would be 50 feet wide, while the secondary entrance from East Markland Drive would be approximately 30 feet wide."	Rationale: Please add in language about the Greenwood Avenue entrance that will be used for O&M only and not construction. SCE recommends the following edits: "Access to the proposed Mesa Substation would be provided by new asphalt and/or concrete access driveways from Potrero Grande Drive and East Markland Drive. The main entrance at Potrero Grande Drive would be 50 feet wide, while the secondary entrance from East Markland Drive would be approximately 30 feet wide. A 26-foot wide paved driveway at Greenwood Avenue will be provided for operation and maintenance purposes of the new test and operations buildings"
2.2.1.4	2-38 Lines 17-18	• "Installation of 24 overhead 66-kVstructures, 17,000 feet of underground duct, and 15 vault structures……."	Rationale: Please update numbers based on current engineering design. Please change "duct" to "duct bank" for further clarification. SCE recommends the following edits: • "Installation of ~~24~~ 23 overhead 66-kVstructures, ~~17,000~~ 10,300 linear feet of underground duct bank, and ~~15~~ 10 vault structures…"
2.2.1.4	2-39 Lines 7-9	"The TSPs would be steel structures with a dulled finish and approximately 3 to 5 feet in diameter at the base, extending approximately 50 to 100 feet above ground."	Rationale: Please update numbers based on current engineering design SCE recommends the following edits: "The TSPs would be steel structures with a dulled finish and approximately 3 to 5 feet in diameter at the base, extending approximately 50 to ~~100~~ 130 feet above ground"
Table 2-4	2-39	**Type of Structure** **Approximate Number of Structures** "Telecommunications Vault" "5"	Rationale: Under Table 2-4: Underground Structure Dimensions, please update numbers based on current engineering design. SCE recommends the following edits: **Type of Structure** **Approximate Number of Structures** "Telecommunications Vault" " ~~5~~ 8"
2.2.3.1	2-45 Lines	"For the proposed replacement of the existing LST on the Goodrich–Laguna Bell 220-kV transmission line, the applicant would use Flotilla Street (at its intersection with Garfield Avenue) as	Rationale: Please update description to reflect correct access point roadway. The intersection described would not be a direct

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
	35-37	an access roadway.”	access point. SCE recommends the following edits: “For the proposed replacement of the existing LST on the Goodrich–Laguna Bell 220-kV transmission line, the applicant would use ~~Flotilla Street (at its intersection with Garfield Avenue)~~ Corvette Street as an access roadway.”
2.3.2.1	2-50 Lines 25-27	“Prior to commencement of the proposed substation, the applicant would also develop a landscaping plan, consulting with the City of Monterey Park Department of Community and Economic Development (Building Division).”	Rationale: Narrative was unclear. To be consistent with the previous sentence, the word commencement should be changed to construction. MWD needs to be consulted on the landscaping plan to ensure that no portion of this plan would affect future O&M or repair activities related to the relocated Middle Feeder. SCE recommends the following edits: “Prior to ~~commencement~~ construction of the proposed substation, the applicant would also develop a landscaping plan, consulting with the City of Monterey Park Department of Community and Economic Development (Building Division) and the Metropolitan Water District.”
2.3.2.1	2-51 Lines 6-12	“Once Phase 3 begins, the applicant would establish the primary substation access driveway from Potrero Grande Drive closer to Greenwood Avenue. This driveway would be about 150 feet wide. During substation operations, each permanent access driveway (Potrero Grande Drive, Greenwood Avenue, and East Markland Drive) would have a rolling gate installed to control access to the Mesa500-kV Substation site.”	Rationale: Please correct the width and location of the primary driveway from Potrero Grande and add in language about the Greenwood Avenue entrance that will be used for O&M only and not construction. SCE recommends the following edits: “Once Phase 3 begins, the applicant would establish the primary substation access driveway from Potrero Grande Drive ~~closer to~~ approximately 700 feet west of Greenwood Avenue. This driveway would be about ~~150~~ 50 feet wide. Also, a new 26-foot wide paved driveway will be provided on Greenwood Avenue approximately 525 feet south of Potrero Grande Drive for operation and maintenance purposes of the new test and operations buildings. During substation operations, each permanent access driveway (Potrero Grande Drive, Greenwood Avenue, and East Markland Drive) would have a rolling gate installed to control access to the Mesa 500-kV Substation site.”
2.3.2.2	2-59 Line 20	“Five telecommunication manholes and six duct banks”	Rationale: Please update numbers based on current engineering design SCE recommends the following edits: “~~Five~~ Eight telecommunication manholes and six duct banks”
2.3.2.2	2-59 Lines 27-31	“Two temporary retaining walls would be constructed during initial site grading in the southwest portion of the Mesa Substation site, near the existing 220-kV LSTs. These walls would create sufficient space to assemble and erect the replacement towers. When the new towers are	Rationale: Please remove language as this scope of work is no longer required as part of the project.

Section	Page	DEIR Language	SCE Recommended Language
		constructed, the retaining walls would be removed and grading around those areas would be completed."	SCE recommends the following edits: ~~"Two temporary retaining walls would be constructed during initial site grading in the southwest portion of the Mesa Substation site, near the existing 220-kV LSTs. These walls would create sufficient space to assemble and erect the replacement towers. When the new towers are constructed, the retaining walls would be removed and grading around those areas would be completed."~~
2.3.2.2	2-64 Lines 19-21	"Following construction activities at each site, the applicant would remove all temporary structures and components. The holes resulting from pole removal would be backfilled using excavated soil from other construction areas."	Rationale: Please update language to reflect accurate timing of activity SCE recommends the following edits: "Following <u>installation of permanent facilities</u> ~~construction activities~~ at each site, the applicant would remove all temporary structures and components. The holes resulting from pole removal would be backfilled using excavated soil from other construction areas."
2.3.3.2	2-67 Lines 2-3	"Transition Structures The applicant would install transition structures following a sequence similar to that described for TSP and wood pole installation."	Rationale Transition structures are the same thing as TSPs and utilize the same installation methods. Please remove reference to transition structures. Additionally, the 66 kV temp shoofly and guard structures, will utilize wood pole installation methods as described below. Therefore, please add in language on wood pole and light weight steel pole installation in this section. SCE recommends the following edits: ~~"Transition Structures~~ ~~The applicant would install transition structures following a sequence similar to that described for TSP and wood pole installation.~~ <u>Wood Pole Installation</u> <u>Each wood pole would require a hole to be excavated using either an auger, backhoe, or with hand tools. The wood poles would be placed in temporary laydown areas at each pole location. While on the ground, the wood poles may be configured (if not preconfigured) with the necessary cross arms, insulators, and wire stringing hardware before being set in place. The wood poles would then be installed in the holes, typically by a line truck with an attached boom. Wood guy stub poles and wood guard structure poles would be installed similarly to wood poles.</u> <u>Light-Weight Steel Pole Installation</u> <u>LWS poles would be installed similar to wood poles."</u>
2.3.3.3	2-68 Lines	"Trenching activities would be temporary and staged to ensure that open trench segments would not exceed the area required for duct bank installation. While constructing in public access areas, the	Rationale

Section	Page	DEIR Language	SCE Recommended Language
	36-40	applicant would install steel plates over open trenches to maintain vehicle and pedestrian traffic. Prior to construction activities, the applicant would also make provisions for emergency vehicle access in coordination with local agencies."	Please update language to provide further clarification to describe timing when steel plates would be used to cover open trenches. SCE recommends the following edits: "Trenching activities would be temporary and staged to ensure that open trench segments would not exceed the area required for duct bank installation. While constructing in public access areas, the applicant would install steel plates over open trenches <u>during inactivity</u> to maintain vehicle and pedestrian traffic. Prior to construction activities, the applicant would also make provisions for emergency vehicle access in coordination with local agencies."
2.3.3.3	2-68 Lines 7-10	"The proposed project would include a total of approximately 3.4 miles of new underground subtransmission lines and also would use existing underground features. For underground construction associated with the proposed project, the applicant would conduct the following activities."	Rationale: Please change underground mileage total to match Table 2-1 based on current engineering design. SCE recommends the following edits: "The proposed project would include a total of approximately ~~3.4~~ <u>4.2</u> miles of new underground subtransmission lines and also would use existing underground features. For underground construction associated with the proposed project, the applicant would conduct the following activities."
2.3.3.3	2-70 Lines 31-35	"The applicant anticipates that horizontal boring operations for the proposed project would excavate between 590 to 1,180 CY of material. Following the duct bank installation, the crew would backfill the bore pits with native materials and cover the duct bank with at least 36 inches of engineered or native fill, as appropriate. Any excess soil material would be hauled off site and disposed of at an approved disposal facility."	Rationale Please update language to provide SCE the flexibility to use excess soil material on-site during construction. SCE recommends the following edits: The applicant anticipates that horizontal boring operations for the proposed project would excavate between 590 to 1,180 CY of material. Following the duct bank installation, the crew would backfill the bore pits with native materials and cover the duct bank with at least 36 inches of engineered or native fill, as appropriate. Any excess soil material would be <u>either utilized on site</u> or hauled off site and disposed of at an approved disposal facility.
2.4.5	2-77 Lines 37-43	"Construction of the proposed project would disturb a surface area greater than 1 acre. Therefore, the applicant would be required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ from the State Water Resources Control Board. Commonly used BMPs are storm water runoff quality control measures (boundary protection), dewatering procedures, and concrete waste management. The SWPPP would be based on current engineering design design and would include all proposed project construction components."	Rationale: Please update language to include a missing amendment in the permit referenced. SCE recommends the following edits: "Construction of the proposed project would disturb a surface area greater than 1 acre. Therefore, the applicant would be required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ <u>and 2012-0006-DWQ</u> from the State Water Resources Control Board. Commonly used BMPs are storm water runoff quality control measures (boundary protection), dewatering procedures, and concrete waste management. The SWPPP would be based on current engineering design design and would include all proposed project construction components."

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
2.5	2-79 Lines 9-10	"Additional O&M activities at the proposed Mesa Substation would include maintenance of non-electrical facilities, including restrooms, air conditioning, and general facilities housekeeping."	Rationale: MWD needs to be consulted on these plans or mitigation requirements to ensure they would have no effect on O&M activities or repairs related to the relocated Middle Feeder. SCE recommends the following edits: "Additional O&M activities at the proposed Mesa Substation would include maintenance of non-electrical facilities, including restrooms, air conditioning, ~~and~~ general facilities housekeeping, and MWD's relocated Middle Feeder."
2.5.2	2-80 Lines 47-48	"For further information about EMFs and CPUC guidelines, refer to: http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Fields"	Rationale: The hyperlink is no longer valid. SCE recommends the following edits: "For further information about EMFs and CPUC guidelines, refer to: ~~http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Fields~~ http://www.cpuc.ca.gov/general.aspx?id=4879"
2.5.2	2-81 Lines 4-10	"SCE would incorporate the following low-cost/no-cost measures into the design of the proposed project: • Utilizing subtransmission structure heights that meet or exceed SCE's preferred EMF design criteria; • Utilizing double-circuit construction that reduces spacing between circuits as compared with single-circuit constructions; • Arranging conductors of proposed subtransmission lines for magnetic field reduction; and • Placing new substation electrical equipment away from the substation property lines closest to populated areas."	Rationale: To be consistent with the Field Management Plan recommended EMF reduction measures. All the magnetic field reduction measures listed in the DEIR would be evaluated and implemented if they meet the CPUC no-cost and low-cost criteria and are engineering feasible. SCE recommends the following edits: "SCE would incorporate the following low-cost/no-cost measures into the design of the proposed project if deemed feasible during current engineering design design: • Utilizing subtransmission structure heights that meet or exceed SCE's preferred EMF design criteria; • Utilizing double-circuit construction that reduces spacing between circuits as compared with single-circuit constructions; • Arranging conductors of proposed subtransmission lines for magnetic field reduction; and • Placing new substation electrical equipment away from the substation property lines closest to populated areas."
Table 2-11	2-84	**State**	Rationale: Please update language to include a missing amendment in the permit referenced.

Section	Page	DEIR Language	SCE Recommended Language
		Consultation or Permit "Notice of Intent to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Section 401 Permit associated with issuance of a Clean Water Act Section 404 Permit."	SCE recommends the following edits: **State** **Consultation or Permit** "Notice of Intent to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ <u>and 2012-0006-DWQ</u> and Section 401 Permit associated with issuance of a Clean Water Act Section 404 Permit."
Table 2-11	2-85	**Regional and Local** **Consultation or Permit** "As directed by State Water Resources Control Board, monitor development and implementation of Storm Water Pollution Prevention Plans (SWPPPs) and other aspects of the National Pollutant Discharge Elimination System permit and 401 certification program. SWPPPs are required for storm water discharges associated with construction activities that disturb more than 1 acre of land."	Rationale: Please modify language to accurately reflect threshold criteria for SWPPP. SCE recommends the following edits: **Regional and Local** **Consultation or Permit** "As directed by State Water Resources Control Board, monitor development and implementation of Storm Water Pollution Prevention Plans (SWPPPs) and other aspects of the National Pollutant Discharge Elimination System permit and 401 certification program. SWPPPs are required for storm water discharges associated with construction activities that disturb <u>1 acre or</u> more ~~than 1 acre~~ of land."
AESTHETICS			
4.1	4.1 Lines	This section describes the environmental and regulatory setting and discusses impacts associated with the construction and operation of the Mesa 500-kilovolt (kV) Substation Project (proposed project) proposed by Southern California Edison Company (SCE, or the applicant) with respect to aesthetics.	Rationale: SCE would like to make it clear to the reader of the Aesthetics section that the landscaping and perimeter wall materials displayed in the visual simulations are conceptual only. Future meetings with the City of Monterey Park

Section	Page	DEIR Language	SCE Recommended Language
	3-6		will be scheduled to discuss the proposed options. SCE recommends the following edits: This section describes the environmental and regulatory setting and discusses impacts associated with the construction and operation of the Mesa 500-kilovolt (kV) Substation Project (proposed project) proposed by Southern California Edison Company (SCE, or the applicant) with respect to aesthetics. <u>All visual simulations included in this section are conceptual only. SCE will meet with the City of Monterey Park to discuss final landscaping and perimeter wall materials (including the spacing of pilasters).</u>
4.1.1.1	4.1-1 Lines 29-30 and Lines 36-38	lines 29-30 “The central component of the proposed project is work that would occur at or adjacent to the proposed Mesa Substation site area.” lines 36-38 “The area is highly developed with housing, commercial and industrial, freeways, and other land uses, including some parks and open space areas.”	Rationale: By not considering the existing industrial/urban visual character, including the presence of existing structures at the substation and nearby transmission corridor, the DEIR analysis overestimates the incremental visual change and visual impacts. This is most significant with respect to the analysis on the potential of degradation to existing visual character. SCE recommends the following edits: lines 29-30 “The central component of the proposed project is ~~work that would occur at or adjacent to the proposed Mesa Substation site area~~ <u>construction of the Proposed Mesa Substation on the site of an existing 21-acre substation.</u>” lines 36-38 “The area is highly developed with <u>an existing substation and transmission lines</u>, housing, commercial and industrial, freeways, and other land uses, including some parks and open space areas.”
Table 4.1-1	4.1-3	“Viewer Sensitivity of Travelers on Potrero Grande Drive, Adjacent to and north of the Mesa Substation site is Moderate”	Rationale: Please update impact conclusions. Sensitivity should be similar to motorists on the Pomona Freeway because both existing visual character and expectations of travelers along both roadways are similar. The DEIR indicates that Viewer Sensitivity of Travelers on Pomona Freeway adjacent to and south of the substation is Low to Moderately Low (DEIR, p. 4.1-3) SCE recommends the following edits: “Viewer Sensitivity of Travelers on Potrero Grande Drive, Adjacent to and north of the Mesa Substation site is ~~Moderate~~ <u>Moderately Low</u>.”
Table	4.1-3	“Viewer Sensitivity of Commercial area (gas station and motel) west of substation site Adjacent to	Rationale:

Section	Page	DEIR Language	SCE Recommended Language
4.1-1		and west and north of the Mesa is Moderate"	Please update impact conclusions. Sensitivity should be similar to motorists on the Pomona Freeway because both existing visual character and expectations of travelers along both roadways are similar. The DEIR indicates that Viewer Sensitivity of Travelers on Pomona Freeway adjacent to and south of the substation is Low to Moderately Low (DEIR, p. 4.1-3) By correcting viewer sensitivity of travelers along Potrero Grande to be moderately low, the DEIR conclusion regarding potential impact would also change and be less than significant. SCE recommends the following edits: "Viewer Sensitivity of Commercial area (gas station and motel) west of substation site Adjacent to and west and north of the Mesa is ~~Moderate~~ Moderately Low."
4.1.3.3	4.1-22 Lines 13-15	"Transmission, subtransmission, and distribution work adjacent to the substation would require work in various locations for short durations as poles are installed or removed, and conductor is installed."	Rationale: Please update terminology to "structures" to encompass both Lattice Steel Towers and Tubular Steel Poles. SCE recommends the following edits: "Transmission, subtransmission, and distribution work adjacent to the substation would require work in various locations for short durations as ~~poles~~ structures are installed or removed, and conductor is installed."
4.1.3.3	4.1-22 Lines 27-29	"The temporary tubular steel pole (TSP) and loop-in that would be installed as part of the proposed project and that would be present during the construction phase would be visible from I-210 as well as nearby residences and a community college."	Rationale: The structure in question is a temporary structure; within SCE a Tubular Steel Pole is a permanent structure. As such, please remove the term "Tubular Steel Pole" from the description and replace with the term "temporary structure" in order to provide a more accurate description. SCE recommends the following edits: "The temporary ~~tubular steel pole (TSP)~~ structure and loop-in that would be installed as part of the proposed project and ~~that~~ would be present during the construction phase would be visible from I-210 as well as nearby residences and a community college."
4.1.3.3	4.1-24 Lines 6-8	"Together, this indicates that no conductor would be located over 200 feet from the ground and that no marker balls are likely to be required."	Rationale: Please update language to reflect that the FAA determinations result in recommendations, not requirements. SCE recommends the following edits: "Together, this indicates that no conductor would be located over 200 feet from the ground and that no marker balls are likely to be ~~required~~ recommended."

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
4.1.3.3	4.1-29 Line 22	"Significant with Mitigation"	Rationale: Please update impact language. This is based on the following: (1) the DEIR incorrectly concludes the impact is significant with implementation of mitigation street tree planting. As noted above, viewer sensitivity is incorrectly characterized as moderate and this should be corrected to moderately low. (2) The visual simulation used for the analysis incorrectly shows a 10-foot instead of 12-foot high wall (SCE provided this in Data Request Set A.15-03-003 ED-SCE-01 Follow Up 3, dated 9/15/15). (3) The Setting portion of the DEIR Aesthetics Chapter characterizes existing visual conditions in the following manner: "The existing tall metal lattice towers and numerous overhead conductors in the foreground contrast strongly with the other elements in this view in scale, form, line, and texture. Silhouetted against the sky, these towers and conductors are dominant elements in this view." Furthermore, the analysis also states that the existing scenic quality at KOP 1 is low (DEIR p. 4.1-8). Given existing low scenic quality and moderately low viewer sensitivity, the DEIR overstates the incremental visual change and incorrectly concludes the visual effect would be significant with implementation of aesthetic mitigation measures. SCE recommends the following edits: "<u>Less than</u> Significant with Mitigation"
4.1.3.3	4.1-29 Lines 3-6	"Work within the North and South Areas include the replacement of a single LST with a similar LST in the City of Commerce, installation of a temporary pole and 220-kV tie-in at Goodrich Substation in Pasadena that would be removed following construction, and the conversion of an existing streetlight source line."	Rationale: SCE recommends tying the removal of the temporary pole to when the temporary tie-in is no longer needed at Goodrich Substation, not when construction is complete. SCE recommends the following edits: "Work within the North and South Areas include the replacement of a single LST with a similar LST in the City of Commerce, installation of a temporary pole and 220-kV tie-in at Goodrich Substation in Pasadena that would be removed ~~following construction~~ <u>once the temporary tie-in is no longer needed</u>, and the conversion of an existing streetlight source line."
4.1.3.3	4.1-30 Lines 21-22	"The trees are shown at approximately 15 to 20 years old, which may be approximately 5 to 10 years after planting, depending on their species and size and age at planting."	Rationale: Please update the DEIR description of the age of the trees, so it is consistent with the PEA visual simulation that shows the trees at approximately 8 years after planting. SCE recommends the following edits: "The trees are shown at ~~approximately 15 to 20 years old, which may be~~ approximately 5 to 10 years after planting, depending on their species and size ~~and age~~ at planting."
4.1.3.3	4.1-30 Lines 36-39	KOP 1: Potrero Grande Drive at Atlas Avenue Project with Landscape Option 1 (Street Tree planting) "With implementation of MM AES-2 and MM AES-3, impacts under this criterion would remain	Rationale: Please update impact language. This is based on the following: (1) the DEIR incorrectly concludes the impact is significant with implementation of mitigation street tree planting. As noted above, viewer sensitivity is incorrectly characterized as moderate and this should be corrected to moderately low. (2) The visual simulation used for the

Section	Page	DEIR Language	SCE Recommended Language
		significant and unavoidable for several years for views from KOP before trees grow to maturity. As the trees in the landscaping mature, they would screen more of the substation and soften the contrast, and impacts would then be less than significant."	analysis incorrectly shows a 10-foot instead of 12-foot high wall (SCE provided this in Data Request Set A.15-03-003 ED-SCE-01 Follow Up 3, dated 9/15/15). (3) The Setting portion of the DEIR Aesthetics Chapter characterizes existing visual conditions in the following manner: "The existing tall metal lattice towers and numerous overhead conductors in the foreground contrast strongly with the other elements in this view in scale, form, line, and texture. Silhouetted against the sky, these towers and conductors are dominant elements in this view." Furthermore, the analysis also states that the existing scenic quality at KOP 1 is low (DEIR p. 4.1-8). Given existing low scenic quality and moderately low viewer sensitivity, the DEIR overstates the incremental visual change and incorrectly concludes the visual effect would be significant with implementation of aesthetic mitigation measures. SCE recommends the following edits: "With implementation of MM AES-2 and MM AES-3, impacts under this criterion would be less than significant. ~~remain significant and unavoidable for several years for views from KOP before trees grow to maturity. As the trees in the landscaping mature, they would screen more of the substation and soften the contrast, and impacts would then be less than significant.~~ After several years as the trees in the landscaping would mature and screen more of the substation and soften the contrast, these less than significant impacts would be reduced."
4.1.3.3	4.1-30 Lines 33-34:	"MM AES-2 would require that the applicant provide landscape screening and aesthetic treatment along Potrero Grande Drive to reduce aesthetic impacts of the proposed project."	Rationale: MM AES-2 discusses site restoration. MM AES-3 discusses landscape screening and aesthetic treatment. Please update accordingly. SCE recommends the following edits: ~~MM AES-2~~ MM AES-3 would require that the applicant provide landscape screening and aesthetic treatment along Potrero Grande Drive to reduce aesthetic impacts of the proposed project.
4.1.3.3	4.1-35 Lines 26-28	KOP 3: Potrero Grande Drive at Saturn Street Project with Landscape Option 1 (Street Tree planting) "With implementation of MM AES-3 and MM AES-4, impacts under this criterion would be somewhat reduced, but would remain significant at KOP 3."	Rationale: The DEIR incorrectly concludes the impact is significant with implementation of street tree planting as mitigation. As noted in previous comments, viewer sensitivity is incorrectly characterized as moderate, which should be corrected to moderately low. A new visual simulation has been prepared showing the revised project design (revised KOPs 3, 6, and 7, and Figure 2-4 Proposed Mesa Substation Layout are attached with SCE's comment letter). A comparison of the DEIR figure and the updated visual simulation demonstrates that the revised project is less visible from this KOP. Further, the Setting portion of the DEIR Aesthetics Chapter characterizes existing visual conditions in the following manner: "The traffic light pole with street signs, tall metal lattice and monopole transmission towers, and overhead conductors in the foreground contrast strongly with the other elements in this view in scale, form, line, and texture. Although the lower portions of the lattice towers are screened by the dense vegetation, most of the upper portions of the towers are highly noticeable. Silhouetted against the sky, these towers and conductors are dominant elements in this view." The Setting portion also states existing scenic quality at KOP 3 is moderately low (DEIR p. 4.1-9). Given existing scenic quality and viewer sensitivity are moderately low, the DEIR overstates the incremental visual change and incorrectly concludes the visual impact would be significant with implementation of aesthetic

Section	Page	DEIR Language	SCE Recommended Language
			mitigation measures. SCE recommends the following edits: "With implementation of MM AES-3 and MM AES-4, impacts under this criterion would be ~~somewhat~~ reduced, ~~but would remain significant~~ to less than significant at KOP 3."
4.1.3.3	4.1-36 Lines 3-7 and Lines 23-31	Lines 3-7 "The new TSPs, tall metal switchracks, and new metal operations and test and maintenance buildings would add new geometric forms and lines to the view. These changes, in combination with removal of the existing tall trees and other vegetation on and around the site, would produce strong contrast and reduce the intactness and unity of views from Potrero Grande Drive." Lines 23-31 "The new masonry screening wall and row of street trees would help screen views of the lower portions of elements in the substation and slightly reduce the contrast; however, the trees would not substantially screen views of the new metal buildings or central TSP in the view, intactness and unity would be substantially reduced, and contrast would be moderately strong. Because the existing vividness, intactness, and unity would be reduced, contrast is moderately strong, and visual sensitivity is moderately high, the proposed project would substantially degrade the existing visual character and quality of the site and its surroundings. Therefore, aesthetic impacts for KOP 3 would be significant under Landscape Option 1."	Rationale: An updated visual simulation has been prepared based on revised project design data (revised KOPs 3, 6, and 7, and Figure 2-4 Proposed Mesa Substation Layout are attached with SCE's comment letter**)**. SCE recommends the following edits: Lines 3-7 "The new TSPs, ~~tall metal~~ switchracks, and new ~~metal operations and test~~ buildings would add new geometric forms and lines to the view. The scale and visual contrast of these project elements would be similar to the existing substation elements. These incremental changes, in combination with removal of the existing tall trees and other vegetation on and around the site, would ~~produce strong contrasts and~~ somewhat reduce the intactness and unity of views from Potrero Grande Drive." Lines 23-31 "The new masonry screening wall and row of street trees would help screen views of the lower portions of elements in the substation and ~~slightly~~ reduce the contrast~~; however, the trees would not substantially screen views of the new metal buildings or central TSP in the view, intactness and unity would be substantially reduced, and contrast would be moderately strong. Because the existing vividness, intactness, and unity would be reduced, contrast is moderately strong, and visual sensitivity is moderately high, the proposed project would substantially degrade the existing visual character and quality of the site and its surroundings.~~ The updated KOP 3 visual simulation demonstrates that the proposed project would not substantially degrade the existing visual character and quality of the site and its surroundings. Therefore, aesthetic impacts for KOP 3 would be less than significant under Landscape Option 1."
4.1.3.3	4.1-42 Line 12	"Figure 4.1-5h shows existing and potential views of the proposed project from KOP 6 looking west from the westbound (northern) lanes of the Pomona Freeway near its undercrossing of Greenwood Avenue."	Rationale: An updated visual simulation has been prepared to show the proposed 12-foot high perimeter wall (revised KOPs 3, 6, and 7, and Figure 2-4 Proposed Mesa Substation Layout are attached with SCE's comment letter**)**. SCE recommends the following edits: "Figure 4.1-5h shows existing and potential views of the proposed project from KOP 6 looking west from the westbound (northern) lanes of the Pomona Freeway near its undercrossing of Greenwood Avenue. An updated visual simulation includes a 12-foot high perimeter wall."

Section	Page	DEIR Language	SCE Recommended Language
4.1.3.3	4.1-47 Lines 27-32 and Lines 42-43	KOP 7: View Northeast from Vail Avenue near Appian Way Lines 27-32 "The new LSTs produce moderate to high contrast and substantially reduce the vividness, intactness, and unity of views from this representative KOP and the surrounding residential neighborhood. Because visual sensitivity is moderately high to high, contrast is moderate to high, and vividness, intactness, and unity would be substantially reduced the proposed project would substantially degrade the existing visual character and quality of the site and its surroundings. Aesthetic impacts for KOP 7 would be significant." Lines 42-43 "There would still be significant skylining and a change in dominant features in the view. Thus, impacts would remain significant after implementation of MM AES-5."	Rationale: Revised visual simulations of KOPs 3, 6, and 7 have been prepared based on updated project information (revised KOPs 3, 6, and 7, and Figure 2-4 Proposed Mesa Substation Layout are attached with SCE's comment letter**)**. The DEIR incorrectly concludes the impact is significant with implementation of aesthetic mitigation. In the Setting portion of the DEIR Aesthetics Chapter, existing visual conditions are characterized in the following manner: "The tall metal lattice transmission towers and overhead conductors in the foreground and middle-ground contrast strongly in scale, form, line, and texture with the other elements in this view. The LSTs are only partially silhouetted against the sky above the ridgeline. The dark colored vegetation in the foreground and behind them helps them blend somewhat with their surroundings and reduces their contrast to a moderate level. These tall structures dominate middle-ground views. However, their presence detracts from views of the distant San Gabriel Mountains." (DEIR p. 4.1-12). Further, the DEIR impact discussion states "The most noticeable change would be the substation equipment itself, which would be consistent with the existing visual character of the area." (DEIR p. 4.1-42). The updated visual simulation demonstrates that fewer LSTs and TSPs will be seen from KOP 7 and the views of the distant mountains will be similar to the existing view. Given the existing moderate scenic quality level and the presence of existing transmission structures that skyline against the mountain background, the DEIR overstates the incremental visual change and incorrectly concludes that with aesthetic mitigation MM AES-5 the visual effect would be significant. MM AES-5 is not required. SCE recommends the following edits: Lines 27-32 "~~The new LSTs produce moderate to high contrast and substantially~~ A comparison of the existing view and the updated visual simulation demonstrates that while the new LSTs and TSP produce moderate contrast, they do not reduce the vividness, intactness, and unity of views from this representative KOP and the surrounding residential neighborhood. Because visual sensitivity is moderately high to high, contrast is moderate, and vividness, intactness, and unity would not be reduced, the proposed project would not result in incremental degradation of the existing visual character and quality of the site and its surroundings. Aesthetic impacts for KOP 7 would be less than significant." Lines 42-43 "~~There would still be significant skylining and a change in dominant features in the view. Thus, impacts would remain significant after implementation of MM AES-5.~~ Given the presence of existing structures that are visible and skyline when seen from KOP 7, the impacts would be less than significant; therefore, no mitigation is required."
4.1.3.3	4.1-51 and	"Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance shall be regraded and revegetated to be restored to an	Rationale:

Section	Page	DEIR Language	SCE Recommended Language
	4.1-52 Lines 42-49 and 1-4	appearance that would replicate pre-construction conditions. **MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions.** Clearing and ground disturbance required for construction, including but not limited to, access roads, pulling sites, construction and maintenance pads, and construction laydown areas, shall be the minimum required, and the applicant shall restore all disturbed areas not required for operation and maintenance to pre-construction conditions to the extent feasible. Restoration would not be feasible if, for example, a landowner other than SCE does not wish the area to be restored. Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance shall be regraded and revegetated to be restored to an appearance that would replicate pre-construction conditions. The CPUC shall verify appropriate restoration of disturbed areas. For all paved areas (e.g., streets, sidewalks, and parking areas) disturbed by construction, the applicant shall restore these areas to pre-project conditions in compliance with permits for work within these areas.”	Please strike this mitigation measure because it is redundant. MM BR-2 and MM BR-3 already address minimization and restoration. The impact analysis section of aesthetics only needs to reference these biological resource mitigation measures. If both the aesthetics and biological resources mitigation measures were to remain in place, there is a potential for conflict between them because the aesthetics measure requires only replicating preconstruction conditions, whereas the biological resource measures may require enhancement. In the event that the mitigation measure is not removed, please modify language to remove regrading as a requirement. The construction and installation of the new transmission structures may affect existing topology. This makes it infeasible to return the ground surface to pre-construction conditions. SCE recommends the following edits: “~~**MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions.** Clearing and ground disturbance required for construction, including but not limited to, access roads, pulling sites, construction and maintenance pads, and construction laydown areas, shall be the minimum required, and the applicant shall restore all disturbed areas not required for operation and maintenance to pre-construction conditions to the extent feasible. Restoration would not be feasible if, for example, a landowner other than SCE does not wish the area to be restored. Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance shall be regraded and revegetated to be restored to an appearance that would replicate pre-construction conditions. The CPUC shall verify appropriate restoration of disturbed areas. For all paved areas (e.g., streets, sidewalks, and parking areas) disturbed by construction, the applicant shall restore these areas to pre-project conditions in compliance with permits for work within these areas.~~” Or “Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance shall be ~~regraded and~~ revegetated ~~to be restored~~ to an appearance that would replicate pre-construction conditions.”
4.1.3.3	4.1-52 Lines 23-26	“The Landscape and Aesthetic Treatment Plan shall be provided to the CPUC for final review and receive final approval from the CPUC prior to construction of these buildings and aesthetic treatments along Potrero Grande Drive. The final approved Landscape and Aesthetic Treatment Plan shall be fully implemented within four months of beginning operation of the new substation.”	Rationale: A “Landscape and Irrigation Plan” and “Wall Plan” are required to be submitted to the City for their review and approval as part of the overall Permitting process. As a result, SCE will ensure that the CPUC will receive copies of the approved permits. SCE recommends the following edits: “The Landscape and ~~Aesthetic Treatment~~ Irrigation and Wall Permits ~~Plan shall~~ will be provided to the CPUC ~~for final review and receive final approval from the~~ prior to construction of these buildings and aesthetic treatments along Potrero Grande Drive. The final approved Landscape and ~~Aesthetic Treatment~~ Irrigation Plan shall be fully implemented within four months of beginning operation of the new substation.”
4.1.4	4.1-52	**“MM AES-5: Glare Reduction.** To reduce potential glare from components of the proposed	Rationale:

Section	Page	DEIR Language	SCE Recommended Language
	Lines 41-46	project and help blend them into the landscape setting, the finishes on all new transmission and other structures with metal surfaces shall be non-reflective and new conductors shall be non-specular. With the exception of LSTs, TSPs, and switchracks, all metal structures up to 35 feet high and visible from the vicinity of KOP 7 shall have finishes that are dark in color or otherwise colored to help blend the structures with their surroundings."	There are no new metal structures other than LSTs and TSPs visible from KOP 7. Please remove language referring to all other new metal structures (revised KOPs and Plot Plan are attached with SCE's comment letter). SCE recommends the following edits: **"MM AES-5: Glare Reduction.** To reduce potential glare from components of the proposed project and help blend them into the landscape setting, the finishes on all new transmission and other structures with metal surfaces shall be non-reflective and new conductors shall be non-specular. ~~With the exception of LSTs, TSPs, and switchracks, all metal structures up to 35 feet high and visible from the vicinity of KOP 7 shall have finishes that are dark in color or otherwise colored to help blend the structures with their surroundings.~~"
AIR QUALITY			
4.2.4	4.2-21 Lines 12-37	**"MM AQ-1: Construction Emission Reduction Measures.** SCE shall implement the following emission reduction measures for all construction activities: 1. All off-road diesel-powered construction equipment with engines greater than 100 horsepower (hp) shall be compliant with Tier 4 off-road emissions standards where available. In the event that equipment with a Tier 4 engine is not available for any off-road engine larger than 100 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 4 emission levels. 2. All off-road diesel-powered construction equipment with engines greater than 50 hp shall be compliant with Tier 3 off-road emissions standards where available. In the event that equipment with a Tier 3 engine is not available for any off-road engine larger than 50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 3 emission levels.	Rationale: Regarding Items 1 and 2, it is SCE's understanding that there is no industry standard process to retrofit lower tiered equipment to a higher tiered level. Therefore, when higher tiered equipment is not available, SCE proposes to comply with the process described in Item 3. Please consider striking the references to retrofitting in Items 1 and 2. Also, regarding Item 4, please consider striking the 15 day notification requirement because it puts an unworkable restriction on construction scheduling and response to unforeseen equipment replacement due to breakdowns. This modification will not change the air quality calculations. SCE recommends the following edits: **"MM AQ-1: Construction Emission Reduction Measures.** SCE shall implement the following emission reduction measures for all construction activities:

Section	Page	DEIR Language	SCE Recommended Language
		3. Equipment with an engine not compliant with the Tier 3 or Tier 4 standards, as applicable, will be allowed on a case-by-case basis only when the applicant has documented that no Tier 3 or Tier 4 equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with signed written correspondence by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms representing a good faith effort to locate engines that meet Tier 3 or Tier 4 requirements, as applicable. Documentation will be submitted to CPUC staff for review before equipment is used on the project. 4. Submit to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, best available control technology (BACT) documentation, and/or CARB or SCAQMD operating permit, as applicable, at least 15 days prior to mobilization of each applicable unit of equipment."	1. All off-road diesel-powered construction equipment with engines greater than 100 horsepower (hp) shall be compliant with Tier 4 off-road emissions standards where available. ~~In the event that equipment with a Tier 4 engine is not available for any off-road engine larger than 100 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 4 emission levels.~~ 2. All off-road diesel-powered construction equipment with engines greater than 50 hp shall be compliant with Tier 3 off-road emissions standards where available. ~~In the event that equipment with a Tier 3 engine is not available for any off-road engine larger than 50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 3 emission levels.~~ 3. Equipment with an engine not compliant with the Tier 3 or Tier 4 standards, as applicable, will be allowed on a case-by-case basis only when the applicant has documented that no Tier 3 or Tier 4 equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with signed written correspondence by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms representing a good faith effort to locate engines that meet Tier 3 or Tier 4 requirements, as applicable. Documentation will be submitted to CPUC staff for review before equipment is used on the project. 4. Submit to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, best available control technology (BACT) documentation, and/or CARB or SCAQMD operating permit, ~~as applicable, at least 15 days~~ prior to mobilization of each applicable unit of equipment."
4.2.4	4.2-21 and 4.2-22 Lines 39-48 and 1-3	**"MM AQ-2: Volatile Organic Compounds Credits.** The remaining emissions of VOC/ROG resulting from construction of the proposed Mesa Substation 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 the start of construction. The applicant shall also track actual daily ROG emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for ROG emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional ROG credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction."	Rationale: Mitigation Measure AQ-2 as written requires tracking actual daily VOC/ROG emissions. Based on SCE's experience with tracking actual daily emissions from a previous project with a similar mitigation measure, this type of daily recordkeeping requirement is incredibly labor intensive for both the applicant and the reviewing agency. Determining actual daily VOC/ROG emissions would be accomplished by each equipment operator maintaining records of individual equipment hours of use; each driver associated with the project and their vehicle would also need to be tracked and accounted for. The raw data would then be collected and compiled from each crew. An air quality analysis to determine VOC/ROG emissions from the raw data would be completed daily to determine whether or not emissions exceeded the threshold. The resulting actual VOC/ROG emissions would be submitted on a monthly basis to the CPUC. Furthermore, the additional staff required to comply with the record keeping requirement would increase vehicle trips and therefore contribute to additional VOC/ROG emissions. Recognizing that the goal of the recordkeeping requirement is to ensure the adequate amount of VOC/ROG credits are purchased, SCE requests, in lieu of the recordkeeping requirement, to purchase up to twice the amount of credits estimated to be required prior to the start of project construction (based on second quarter 2016 average pricing). This extremely conservative approach to the purchase of credits would alleviate onerous labor costs associated with recordkeeping, and instead, focus the costs on an additional measurable environmental benefit. SCE recommends the following edits:

Section	Page	DEIR Language	SCE Recommended Language
			"MM AQ-2: Volatile Organic Compounds Credits. The remaining emissions of VOC/ROG resulting from construction of the proposed Mesa Substation 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~~ 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 the purchase of up to twice the estimated amount of credit of the required ETC to the SCAQMD prior to the start of construction. ~~The applicant shall also track actual daily ROG emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for ROG emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional ROG credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.~~"
4.2.4	4.2-22 Lines 5-18	**"MM AQ-3: Measures to Reduce NOX Emissions.** Prior to construction, the applicant and SCE will submit proposed additional measures to reduce daily emissions of NOX to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction. Measures may include the following: 1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NOX emissions requirements if 2010 model year or newer diesel trucks cannot be obtained. 2. A requirement that, during project construction, all construction equipment shall be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. 3. Other measures as determined appropriate by the applicant and SCE in consultation with the SCAQMD."	Rationale: SCE is unaware of any commercially available CARB certified BACT devices that would be appropriate for use during this construction project. SCE recommends the following edits: **"MM AQ-3: Measures to Reduce NOX Emissions.** Prior to construction, the applicant ~~and SCE~~ will submit proposed ~~additional~~ measures to reduce daily emissions of NOX to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction. Measures may include the following: 1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NOX emissions requirements if 2010 model year or newer diesel trucks cannot be obtained. ~~2. A requirement that, during project construction, all construction equipment shall be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.~~ 2.~~3~~. Other measures as determined appropriate by the applicant ~~and SCE~~ in consultation with the SCAQMD."
4.2.4	4.2-22 Lines 20-39	**"MM AQ-4: Mitigation Agreement for Purchase of Oxides of Nitrogen (NOX) Credits.** Twenty days prior to the start of project construction, the applicant shall provide CPUC staff with an estimate of the total construction -related NOX emissions after implementation of all applicable mitigation measures, broken down by individual construction day. All NOX emissions that would exceed the daily threshold of 100 pounds per day shall be offset through the purchase of either Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction	Rationale: Mitigation Measure AQ-4 as written requires tracking actual daily NO_X emissions. Based on SCE's experience with tracking actual daily emissions from a previous project with a similar mitigation measure, this type of daily recordkeeping requirement is incredibly labor intensive for both the applicant and the reviewing agency. Determining actual daily NO_X emissions would be accomplished by each equipment operator maintaining

Section	Page	DEIR Language	SCE Recommended Language
		Credits (MSERCs), or a combination of RTCs and MSERCs. For each day that estimated NOX emissions are less than 100 pounds per day, the purchase of NOX offset credits is not required. The total amount of NOX RTCs and/or MSERCs to be purchased shall be determined by the CPU after the construction schedule and operating conditions are finalized, based on estimates provided by the applicant as described above. The NOX emission credits shall be purchased and submitted to the CPUC prior to the start of project construction. Credits must be current for the time the project takes place. The applicant shall also track actual daily NOX emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for NOX emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional NOX credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction." records of individual equipment hours of use; each driver associated with the project and their vehicle would also need to be tracked and accounted for. The raw data would then be collected and compiled from each crew. An air quality analysis to determine NO_X emissions from the raw data would be completed daily to determine whether or not emissions exceeded the threshold. The resulting actual NO_X emissions would be submitted on a monthly basis to the CPUC. Furthermore, the additional staff required to comply with the record keeping requirement would increase vehicle trips and therefore contribute to additional NOx emissions. Recognizing that the goal of the recordkeeping requirement is to ensure the adequate amount of NO_X credits are purchased, SCE requests, in lieu of the recordkeeping requirement, to purchase up to twice the amount of credits estimated to be required prior to the start of project construction (based on second quarter 2016 average pricing). This extremely conservative approach to the purchase of credits would alleviate onerous labor costs associated with recordkeeping, and instead, focus the costs on an additional measurable environmental benefit. SCE recommends the following edits: **"MM AQ-4: Mitigation Agreement for Purchase of Oxides of Nitrogen (NOX) Credits.** Twenty days prior to the start of project construction, the applicant shall provide CPUC staff with an estimate of the total construction - related NOX emissions after implementation of all applicable mitigation measures, broken down by individual construction day. All NOX emissions that would exceed the daily threshold of 100 pounds per day shall be offset through the purchase of either Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs. For each day that estimated NOX emissions are less than 100 pounds per day, the purchase of NOX offset credits is not required. The total amount of NOX RTCs and/or MSERCs to be purchased shall be determined by the CPU after the construction schedule and operating conditions are finalized, based on estimates provided by the applicant as described above. The NOX emission credits shall be purchased and submitted to the CPUC prior to the start of project construction. <u>The ERCs purchased will be up to twice the amount estimated to be needed</u>. Credits must be current for the time the project takes place. ~~The applicant shall also track actual daily NOX emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for NOX emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional NOX credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.~~"

Section	Page	DEIR Language	SCE Recommended Language
BIOLOGICAL RESOURCES			
Table 4.3-1	4.3-6	**Non-native Vegetation** "This vegetation type is dominated by weedy non-native plants that thrive in areas repeatedly disturbed by human activity. In the proposed project area this vegetation type includes crimson fountain grass (Pennisetum setaceum), black mustard, short-podded mustard, wild radish, tocalote (Centaurea melitensis), prickly lettuce (Lactuca serriola), telegraph weed (Heterotheca grandiflora), Russian thistle (Salsola tragus), woolly mullein (Verbascum thapsus), and sweet fennel (Foeniculum vulgare). This habitat type typically supports few wildlife species but is used extensively by coastal California gnatcatcher for foraging and breeding to the south of the current Mesa Substation. Non-native vegetation within the proposed project area also supports loggerhead shrike and least Bell's vireo."	Rationale: Based on Figure 4.3-1 and Figure 5 of Appendix D, least Bell's vireo was documented in the Disturbed/Developed vegetation type. There are no observation for this species in Non-native Vegetation. SCE recommends: **Non-native Vegetation** "This vegetation type is dominated by weedy non-native plants that thrive in areas repeatedly disturbed by human activity. In the proposed project area this vegetation type includes crimson fountain grass (Pennisetum setaceum), black mustard, short-podded mustard, wild radish, tocalote (Centaurea melitensis), prickly lettuce (Lactuca serriola), telegraph weed (Heterotheca grandiflora), Russian thistle (Salsola tragus), woolly mullein (Verbascum thapsus), and sweet fennel (Foeniculum vulgare). This habitat type typically supports few wildlife species but is used extensively by coastal California gnatcatcher for foraging and breeding to the south of the current Mesa Substation. Non-native vegetation within the proposed project area also supports <u>foraging</u> loggerhead shrike ~~and least Bell's vireo~~."
Table 4.3-2	4.3-13	The Table 4.3-2 contains the following information. "Nevin's barberry (*Berberis nevinii*) *Present:* This species was observed in Whittier Narrows Natural Area adjacent to an existing distribution pole and paved pathway within the corridor for Telecommunications Route 3 during December 2014 field surveys. Intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*) Moderate: Suitable habitat for this species occurs along Telecommunications Route 3 where it parallels East Lincoln Avenue. CNDDB occurrences from 2008-2010 are located in the Puente Hills area, approximately 2.5 miles south of Telecommunications Route 3. Plummer's mariposa-lily (*Calochortus plummerae*) Moderate: This species has been recorded extensively in the Puente Hills area, approximately 2.5 miles south of Telecommunications Route 3. Suitable habitat occurs along Telecommunications Route 3 where it parallels East Lincoln Avenue.	Rationale: There is an apparent discrepancy between the protocol rare plant survey results (Appendix F) and this table. Please consider the following: 1) Nevin's Barberry also was found during protocol botany surveys 2015. Also, the botanist noted that this appears to be planted. There are other individuals outside of the survey area within the Nature Center parking lot planter. 2) Protocol surveys for intermediate mariposa-lily, plummer's mariposa-lily, and southern tarplant were conducted in 2015. All three species were observed at local reference populations. Meaning, when the botanists performed surveys for the Mesa project, these three species would have been observable, if present. The lack of observations in Appendix F cannot be a product of observer error or the plant not currently flowering. The more logical conclusion is that these species are absent. In effect, the protocol surveys provide substantial evidence that the species are absent or, at best, have a low potential to occur. 3) Table is missing Coulter's matilija poppy (*Romneya coulteri*). According to Appendix F, this species was observed and needs to be added after southern tarplant. SCE recommends the following edits: "Nevin's barberry (*Berberis nevinii*)

Section	Page	DEIR Language	SCE Recommended Language
		Southern tarplant (*Centromadia parryi* ssp. *australis*) High: Suitable habitat for this species occurs along the banks of the Rio Hondo River within the proposed corridor for Telecommunications Route 3. A CNDDB occurrence from 2010 documented at least 2,000 plants less than half a mile from Telecommunications Routes 1 and 3. In addition, a Calflora observation entry made in April 2015, documented 12 individuals in the same area as the 2010 CNDDB record. During surveys conducted in May 2015 an additional observation of this species was made east of Telecommunications Route 1. The species was sited outside of the survey area within the boundaries of an adjacent gun club.”	Present: This species was observed in Whittier Narrows Natural Area adjacent to an existing distribution pole and paved pathway within the corridor for Telecommunications Route 3 during December 2014 field surveys and spring 2015 protocol surveys; however, it appears to be a planted individual. Intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*) ~~Moderate~~ Absent: Potential ~~Suitable~~ habitat for this species occurs along Telecommunications Route 3 where it parallels East Lincoln Avenue. CNDDB occurrences from 2008-2010 are located in the Puente Hills area, approximately 2.5 miles south of Telecommunications Route 3. CNPS protocol surveys conducted by a qualified botanist in 2015 did not observe this species on-site, even though it was blooming at other local populations. Plummer’s mariposa-lily (*Calochortus plummerae*) ~~Moderate~~ Absent: This species has been recorded extensively in the Puente Hills area, approximately 2.5 miles south of Telecommunications Route 3. Potential ~~Suitable~~ habitat occurs along Telecommunications Route 3 where it parallels East Lincoln Avenue. CNPS protocol surveys conducted by a qualified botanist in 2015 did not observe this species on-site, even though it was blooming at other local populations. Southern tarplant (*Centromadia parryi* ssp. *australis*) ~~High~~ Low: Potential ~~Suitable~~ habitat for this species occurs along the banks of the Rio Hondo River within the proposed corridor for Telecommunications Route 3. A CNDDB occurrence from 2010 documented at least 2,000 plants less than half a mile from Telecommunications Routes 1 and 3. In addition, a Calflora observation entry made in April 2015, documented 12 individuals in the same area as the 2010 CNDDB record. During surveys conducted in May 2015 an additional observation of this species was made east of Telecommunications Route 1. The species was sited outside of the survey area within the boundaries of an adjacent gun club. CNPS protocol surveys conducted by a qualified botanist in 2015 did not observe this species on-site, even though it was blooming at other local populations. Coulter’s matilija poppy (*Romneya coulteri*) -/-/4.2 Occurs chaparral and coastal sage scrub, often in burn areas, and usually in proximity to dry washes and canyons Blooms: March-July Occur: This species was observed in Whittier Narrows Natural Area near an existing distribution pole and paved pathway within the corridor for Telecommunications Route 3 during spring 2015 protocol surveys; however, it appears to be a planted population.”

Section	Page	DEIR Language	SCE Recommended Language
Table 4.3-3	4.3-15	"Present: Least Bell's vireos were observed nesting and foraging primarily in riparian areas along Telecommunications Route 3 and foraging within the proposed Mesa Substation site area and adjacent 500-kV transmission corridor."	Rationale: Least Bell's vireo was not observed foraging within the Mesa Substation site, as documented in Figure 5 of Appendix D of the DEIR. There was one observation of least Bell's Vireo, during migration, within the nursery located in the adjacent 500-kV transmission corridor. The mulefat scrub lacks multi-level canopy required by this species. Further, the total acres of mulefat are smaller than the typical territory size for Least's Bell's vireo. For this reason, SCE believes the habitat on site is marginal at best. On April 15, 2015, USFWS concurred that surveying the Mesa substation site was unnecessary given the lack of habitat. Given the lack of observations of this species on the Mesa Substation site, SCE disagrees with the DEIR where it states that this species was "observed" foraging at the Mesa Substation site. SCE Recommends the following changes. "Present: Least Bell's vireos were observed nesting and foraging primarily in riparian areas along Telecommunications Route 3 and foraging <u>during migration</u> within the ~~proposed Mesa Substation site area and~~ adjacent 500-kV transmission corridor."
4.3.3.3	4.3-32 Lines 10-12	"The California black walnut is ranked as an S3 species, indicating that the species is vulnerable (CDFW 2010). In addition, it is ranked by the CNPS as 4.2, indicating that the species is of limited distribution and is moderately threatened fairly endangered in California (CNPS 2015)."	Rationale: CEQA BR-1 addresses individual species, not plant communities. Lines 10-11 incorrectly list California black walnut as an S3 species. Global (G) and State (S) rankings apply to plant communities and not individuals. Further, the reference provided of CDFW 2010 is the state list of plant communities, including sensitive plant communities. Walnut will form a plant community with a state ranking of S3, but walnut communities should be addressed under CEQA BR-2. As such, this section only applies to the individual, which has a rarity ranking of 4.3. Further, Line 12 mischaracterizes the CNPS-designated rarity ranking. The term "endangered" is only applicable for plants with a 1B or 2B rarity ranking. Instead CNPS defines 0.2 as "Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)." Therefore, "fairly endangered" should be changed to "moderately threatened." SCE recommends the following edits: "The California black walnut ~~is ranked as an S3 species, indicating that the species is vulnerable (CDFW 2010). In addition, it~~ is ranked by the CNPS as 4.2, indicating that the species is of limited distribution and is ~~fairly endangered~~ <u>moderately threatened</u> in California (CNPS 2015)."
4.3.3.3	4.3-33 Lines 11-22	"Work within suitable habitat where this species has moderate potential to occur primarily includes installation of telecommunications cable on existing poles. A 275-foot segment of telecommunications cable at the eastern terminus of Telecommunications Route 1 would also be installed underground in new conduit. In addition, access and spur road improvement or rehabilitation may be required for construction and operations and could include clearing, grubbing, widening, and constructing drainage improvements. Although no permanent ground disturbance or vegetation removal is planned in the location of known individual Southern tarplant occurrences, direct impacts to known or unknown occurrences of this species could occur if they are present in the proposed work area. Indirect impacts could also occur if the species is present within or adjacent to work areas. Indirect impacts could result from dust settling on plants and from the spread of	Rationale: Based on existing conditions, protocol rare plant surveys did not observe southern Tarplant, even though the species was available to be observed given it was evident at other local populations and observed at the reference populations by the botanist. Therefore, SCE disagrees with the conclusion that it has a "moderate potential to occur" and "impact to southern tarplant would be significant." Given it is a species with a fairly good ability to disperse, at best, it should be given a low potential to occur. The impact analysis is inconsistent with results in Appendix F. Also note, "moderate" potential in text here contradicts "high" potential listed in Table 4.3-2.

Section	Page	DEIR Language	SCE Recommended Language
		invasive weeds that prevent the establishment of new individuals or cause the mortality of existing individuals. Impacts to Southern tarplant would be significant."	Further, even if tarplant were to occur, despite the findings of the protocol survey, it is possible that it could be part of an existing population that is 0.3 miles upstream. CDFW/CNDDB defines populations as occurrences, which includes all individual records within 0.25 miles. As such, any additional observations during construction could be within 0.25 miles of the existing CNDDB record, making this one population. In this instance, the impact may not be significant (e.g., destroying 1 plant of 1000 is not significant). Therefore, impacts cannot definitively state that impacts will be significant when 1) there is no further supporting evidence that the species could occur that overrules the protocol surveys conducted by qualified botanists where southern tarplant was absent, 2) even if discovered, the loss of a few individuals may not constitute a "significant" impact if part of a larger population. SCE recommends the following edits: "Work within ~~suitable~~ potential habitat where this species has low ~~moderate~~ potential to occur primarily includes installation of telecommunications cable on existing poles. A 275-foot segment of telecommunications cable at the eastern terminus of Telecommunications Route 1 would also be installed underground in new conduit. In addition, access and spur road improvement or rehabilitation may be required for construction and operations and could include clearing, grubbing, widening, and constructing drainage improvements. This species was not observed during protocol surveys conducted in 2015, but there is a low potential for this species to disperse into work areas. Although no permanent ground disturbance or vegetation removal is planned in the location of known individual Southern tarplant occurrences, direct impacts to known or unknown occurrences of this species could occur if they are present in the proposed work area. Indirect impacts could also occur if the species is present within or adjacent to work areas. Indirect impacts could result from dust settling on plants and from the spread of invasive weeds that prevent the establishment of new individuals or cause the mortality of existing individuals. If present, impacts to Southern tarplant ~~would~~ could be significant."
4.3.3.3	4.3-33 and 4.3-34 Lines 40-48 and 1-9	"Plummer's Mariposa-lily is not listed under FESA or CESA. However, it has a CNPS rare plant ranking of 4.2, which means that it is a species of limited distribution and fairly endangered in California. Potential habitat for this species occurs along Telecommunications Route 3; however, this habitat is not of high quality. Recent CNDDB occurrences indicate that this species is frequently observed in the Puente Hills area south of Telecommunication Route 3 but the closest occurrence is approximately 2.5 miles south of Telecommunications Route 3. Therefore, the potential for this species to occur within the proposed project area is moderate. However, if a Plummer's Mariposa lily were found within the proposed project area, impacts to this species would be significant. Although the applicant has committed to implementing APM-BIO-01, APM-BIO-02, and APM-BIO-03, these APMs would not reduce impacts to this species to less than significant. Plummer's Mariposa-lilies, if found on site, may be damaged or destroyed if pre-construction surveys are not completed closer to construction. Therefore, the applicant would be required to implement MM BR-1, which requires pre-construction surveys; MM BR-2, which would require delineating work areas; MM BR-5, which would require that workers receive training in plant identification, the proposed project's environmental commitments, and how best to avoid impacting sensitive plant species; and MM BR-8, which would require mitigation for impacts to Plummer's Mariposa lily at a 1:1 ratio. With the implementation of applicable APMs, and MM BR-1, MM BR-2, MM BR-5, and MM BR-	Rationale: Based on the existing conditions, protocol rare plant surveys did not observe Plummer's mariposa-lily even though the species was available to be observed given it was evident at other local populations and observed at the reference populations by the botanist. Therefore, SCE disagrees with the conclusion that it has a "moderate potential to occur." The impact analysis is inconsistent with results in Appendix F. Mariposa-lilies grow via bulbs and have low dispersal rates, meaning they occur at the same locations year after year. Generally, the only thing that differs is the number of individuals flowering each year, which depends upon annual growing conditions. Qualified botanists observed it flowering at reference populations in spring 2015. If the species were present in the survey area then it would have been detected during protocol surveys. Therefore, the life history of this species and the survey data strongly suggests that this species is absent. Existing mitigation measures already cover the potential to find new individuals and provide restoration for species that currently may be absent. SCE recommends the following edits:

Section	Page	DEIR Language	SCE Recommended Language
		8, impacts would be reduced to less than significant."	"Plummer's Mariposa-lily is not listed under FESA or CESA. However, it has a CNPS rare plant ranking of 4.2, which means that it is a species of limited distribution and fairly endangered in California. Potential habitat for this species occurs along Telecommunications Route 3; however, this habitat is not of high quality. Recent CNDDB occurrences indicate that this species is frequently observed in the Puente Hills area south of Telecommunication Route 3 but the closest occurrence is approximately 2.5 miles south of Telecommunications Route 3. Further, it was not observed during protocol rare plant surveys despite the fact this species was flowering at nearby reference populations. Therefore, this species was determined to be absent ~~the potential for this species to occur~~ within the proposed project area ~~is moderate~~. However, if a Plummer's Mariposa lily were found within the proposed project area, impacts to this species would be significant. Although the applicant has committed to implementing APM-BIO-01, APM-BIO-02, and APM-BIO-03, these APMs would not reduce impacts to this species to less than significant. Plummer's Mariposa-lilies, if found on site, may be damaged or destroyed if pre-construction surveys are not completed closer to construction. Therefore, the applicant would be required to implement MM BR-1, which requires pre-construction surveys; MM BR-2, which would require delineating work areas; MM BR-5, which would require that workers receive training in plant identification, the proposed project's environmental commitments, and how best to avoid impacting sensitive plant species; and MM BR-8, which would require mitigation for impacts to Plummer's Mariposa lily at a 1:1 ratio. Although the species was determined to be absent, if observed during construction, ~~With~~ the implementation of applicable APMs, and MM BR-1, MM BR-2, MM BR-5, and MM BR-8, ~~impacts~~ would ~~be~~ reduce~~d~~ impacts to less than significant."
4.3.3.3	4.3-34 Lines 12-31	"The intermediate Mariposa-lily is not listed under the CESA or FESA; however, it has a CNPS rare plant ranking of 1B.2, which means that it is rare, threatened, or endangered in California and elsewhere. Suitable habitat for this species exists along Telecommunications Route 3; however, there have been no documented occurrences of this species within the proposed project area or the immediate vicinity. There have been four historic CNDDB occurrences, which were documented between 2008 and 2010, within 5miles of the proposed project area. The closest occurrence was approximately 2.5 miles south of Telecommunications Route 3. The potential for this species to be present within the proposed project area is considered moderate. If this species is found in the proposed project area and damaged or removed, impacts to this species would be significant. Although the applicant has committed to implementing APM-BIO-01, APM-BIO-02, and APM-BIO-03, these APMs would not reduce impacts to this species to less than significant because success criteria for replanting and replacement ratios are not included, and worker training to identify the resource is not included. Therefore, the applicant would be required to implement MM BR-1, which would require pre-construction surveys; MM BR-2, which requires delineating work areas occurring in the vicinity of sensitive species; MM BR-5, which require that workers receive training in plant identification, the proposed project's environmental commitments, and how best to avoid impacting sensitive plant species; and MM BR-8, which would require mitigation for impacts to intermediate mariposa lily at a 1:1 ratio. With the implementation of MM BR-1, MM BR-2, MM BR-5, and MM BR-8, in combination with the APMs identified above, impacts would be reduced to less than significant."	Rationale: Based on the existing condition, in which protocol rare plant surveys did not observe intermediate mariposa-lily, SCE disagrees with the conclusion that it has a "moderate potential to occur." The impact analysis is inconsistent with results in Appendix F. Mariposa-lilies grow via bulbs and have low dispersal rates, meaning they occur at the same locations year after year but the only thing that differs is the number of individuals flowering. Qualified botanists observed it flowering at reference populations in spring 2015, meaning that if the species were present in the survey area then it would have been detected during protocol surveys. Therefore, the life history of this species and the survey data strongly suggests that this species is absent. Existing mitigation measures already cover the potential to find new individuals and provide restoration for species that currently may be absent. SCE recommends the following edits: "The intermediate Mariposa-lily is not listed under the CESA or FESA; however, it has a CNPS rare plant ranking of 1B.2, which means that it is rare, threatened, or endangered in California and elsewhere. Suitable habitat for this species exists along Telecommunications Route 3; however, there have been no documented occurrences of this species within the proposed project area or the immediate vicinity. There have been four historic CNDDB occurrences, which were documented between 2008 and 2010, within 5 miles of the proposed project area. The closest occurrence was approximately 2.5 miles south of Telecommunications Route 3. Further, it was not observed during protocol rare plant surveys despite the fact this species was flowering at nearby reference populations. Therefore, this species was determined to be absent ~~The potential for this species to be present~~ within the proposed project area ~~is considered moderate~~. If this species is found in the proposed project area and damaged or removed, impacts to this species would be significant. Although the applicant has committed to implementing

<table>
<tr><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td></td><td></td><td></td><td>APM-BIO-01, APM-BIO-02, and APM-BIO-03, these APMs would not reduce impacts to this species to less than significant because success criteria for replanting and replacement ratios are not included, and worker training to identify the resource is not included. Therefore, the applicant would be required to implement MM BR-1, which would require pre-construction surveys; MM BR-2, which requires delineating work areas occurring in the vicinity of sensitive species; MM BR-5, which require that workers receive training in plant identification, the proposed project’s environmental commitments, and how best to avoid impacting sensitive plant species; and MM BR-8, which would require mitigation for impacts to intermediate mariposa lily at a 1:1 ratio. Although the species was determined to be absent, if observed during construction, ~~With~~ the implementation of MM BR-1, MM BR-2, MM BR-5, and MM BR-8, in combination with the APMs identified above, ~~impacts~~ would ~~be~~ reduce~~d~~ impacts to less than significant.”</td></tr>
<tr><td>4.3.3.3</td><td>4.3-35 Lines 39-40</td><td>“MM BR-2, which requires installation of exclusionary fencing to delineate the designated work areas and avoid sensitive resources”</td><td>Rationale:

Exclusionary fencing is typically used for listed reptiles and amphibians. The additional fencing requirement has a potential to increase biological impacts. The work needed to be done at each pole (i.e., line stringing) is a short duration activity, ranging between two to eight hours a day for one to two days. This work does not require ground-disturbance. Therefore, requiring exclusionary fencing around each pole increases ground disturbance, which is not being captured in the impact analysis for this species. Further, many of the poles are located along roads where work would be conducted directly from the road and shoulder; SCE could not practically install fencing on the roads to protect these work locations.

SCE recommends the following edits:

“MM BR-2, which requires flagging and avoidance of ~~installation of exclusionary fencing to delineate the designated work areas and avoid~~ sensitive resources areas”</td></tr>
<tr><td>4.3.3.3</td><td>4.3-37 and 4.3-38

Lines 42-47 and Lines 1-2</td><td>“The proposed project area contains suitable habitat for several special-status birds as well as those protected by the MBTA and Fish and Game Code. Raptor species, such as the peregrine falcon and Swainson’s hawk, were observed within the main project area during surveys and may have been 45 foraging or flying through.”</td><td>Rationale:

Despite the DEIR identifying three raptors, there is no text covering these species or explanation as to why they were not addressed. SCE recommends addressing these three species in the Special Status Birds paragraph only.

SCE recommends the following edits:

“The proposed project area contains suitable habitat for several special-status birds as well as those protected by the MBTA and Fish and Game Code. Raptor species, such as the peregrine falcon and Swainson’s hawk, were observed within the main project area during surveys and may have been 45 foraging or flying through. In addition, White-tailed Kite could forage in areas along the telecommunications route. These three raptors do not have nesting habitat present and would only occur during migration and/or foraging and will not be discussed further.”</td></tr>
<tr><td>4.3.3.3</td><td>4.3-39</td><td>Table 3.4-4 states:

<table><tr><th>Project Component</th><th>Approximate Impact Area</th><th>Approximate Temporary Impacts</th><th>Approximate Permanent Impacts</th></tr></table></td><td>Rationale:

This table has not incorporated results of the 2015 protocol surveys. As such, the habitat is limited to the transmission, subtransmission, and distribution areas along existing powerlines south of the existing substation. Further, there are areas where grading cannot occur because restoration or EPA sites cannot have vegetation clearing, thereby slightly reducing the impacts. Many of the areas where gnatcatcher was present is atypical</td></tr>
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<table>
<tr><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr>
<td></td>
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<table>
<tr><th></th><th>(acres)</th><th>(acres)</th><th>(acres)</th></tr>
<tr><td>Proposed Mesa Substation</td><td>21.54</td><td>7.45</td><td>14.09</td></tr>
<tr><td>Associated transmission, subtransmission, and distribution lines</td><td>2.06</td><td>1.92</td><td>0.14</td></tr>
<tr><td>Telecommunication Route 2a</td><td>0.43</td><td>0.43</td><td>0.0</td></tr>
<tr><td>Telecommunication Route 3</td><td>2.28</td><td>2.28</td><td>0.0</td></tr>
<tr><td>Total</td><td>26.31</td><td>12.08</td><td>14.23</td></tr>
<tr><td>Impacts within USFWS Critical Habitat</td><td>1.89</td><td>1.89</td><td>0.0</td></tr>
</table>
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habitat.

SCE recommends the following edits:
<table>
<tr><th>Project Component</th><th>Approximate Impact Area (acres)</th><th>Approximate Temporary Impacts to Coastal Sage Scrub (acres)</th><th>Approximate Permanent Impacts to Coastal Sage Scrub (acres)</th><th>Approximate Temporary Impacts to Atypical Habitat (acres)</th><th>Approximate Permanent Impacts to Atypical Habitat (acres)</th></tr>
<tr><td>Proposed Mesa Substation</td><td>21.54</td><td><s>7.45</s> 0.0</td><td><s>14.09</s> 0.0</td><td>7.45</td><td>14.09</td></tr>
<tr><td>Associated transmission, subtransmission, and distribution lines</td><td>2.06</td><td><s>1.92</s> 0.98</td><td><s>0.14</s> 0.02</td><td>0.94</td><td>0.12</td></tr>
<tr><td>Telecommunication Route 2a</td><td>0.43</td><td>0.43</td><td>0.0</td><td>0.0</td><td>0.0</td></tr>
<tr><td>Telecommunication Route 3</td><td>2.28</td><td>2.28</td><td>0.0</td><td>0.0</td><td>0.0</td></tr>
<tr><td>Total</td><td><s>26.31</s> 4.37</td><td><s>12.08</s> 3.69</td><td><s>14.23</s> 0.02</td><td>8.39</td><td>14.21</td></tr>
<tr><td>Impacts within USFWS Critical Habitat</td><td>1.89</td><td>1.89</td><td>0.0</td><td>0.0</td><td>0.0</td></tr>
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<tr>
<td>4.3.3.3</td>
<td>4.3-39 Lines 12-32</td>
<td>“During habitat assessments, suitable habitat was considered to be coastal sage scrub with greater than 50 percent cover, consisting of species such as California sagebrush and/or California buckwheat, or areas consisting of a matrix of sparse, scattered coastal sage scrub shrubs and annual/biennial vegetation with sufficient morphological structure and density to support coastal California gnatcatcher nesting and provide foraging opportunities (Insignia 2015b).

Direct impacts to this species or its nest could occur as a result of vehicular collision and nest failure or abandonment due to noise and human presence during construction; this would be a significant</td>
<td>Rationale:

The DEIR uses information from the BRTR, which did not have USFWS protocol surveys conducted. Therefore, the conclusions within the BRTR are preliminary. The protocol surveys (Appendix G) came to more substantive conclusions regarding habitat, which are in line with USFWS definitions of habitat. Non-native grasslands or ruderal areas are not habitat for California Gnatcatcher and can be considered as atypical habitat for Gnatcatcher occurrences. The ruderal vegetated areas onsite cannot be classified as coastal sage scrub, nor is there evidence that suggests these areas were historically coastal sage scrub. In fact, historic aerial photos show that this coastal sage</td>
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Section	Page	DEIR Language	SCE Recommended Language
		impact. APM-BIO-03 commits SCE to monitoring construction activities to the extent feasible. APM-BIO-04 commits SCE to conducting pre-construction surveys for the coastal California gnatcatcher if construction activities occur during the avian nesting season; establishing an exclusionary buffer, in coordination with USFWS, if a nest is observed,; and full-time monitoring of construction activities in occupied habitat. Direct impacts would still be significant because APM-BIO-3 does not ensure proper monitoring protocols are followed and APM-BIO-04 would not require the established protocol to be used for gnatcatcher surveys. Indirect impacts to this species could result from habitat modifications through vegetation trimming, clearing of vegetation, and other ground-disturbing activities. The proposed project would include removal of approximately 14.23 acres of coastal California gnatcatcher habitat. As described further in Table 4.3-4, temporary impacts to 1.89 acres of USFWS designated gnatcatcher critical habitat along Telecommunications Route 3 may occur. Indirect impacts would be significant."	scrub was planted in 2009. SCE recommends that the habitat designation should be limited to coastal sage scrub and not all of the atypical habitat being characterized in the DEIR. Indeed, if the coastal sage scrub were absent from this site and/or the cumulative impact from the adjacent project removes vegetation, there would be no expectation for California Gnatcatcher to occur. SCE recommends the following edits: "During the initial habitat assessments, suitable habitat was considered to be coastal sage scrub with greater than 50 percent cover, consisting of species such as California sagebrush and/or California buckwheat, or areas consisting of a matrix of sparse, scattered coastal sage scrub shrubs and annual/biennial vegetation with sufficient morphological structure and density to support coastal California gnatcatcher nesting and provide foraging opportunities (Insignia 2015b). However, protocol-level surveys by a permitted California Gnatcatcher biologist found that the suitable habitat was moderate and high quality coastal sage scrub, disturbed/fragmented coastal sage scrub, and revegetated coastal sage scrub (Appendix G). The ruderal area adjacent to habitat occasionally have nesting attempts, all of which have failed. These ruderal areas only have California Gnatcatcher present because the small amount of quality habitat restricts the population size and dispersal, resulting in individuals attempting to nest in atypical adjacent habitat. Direct impacts to this species or its nest could occur as a result of vehicular collision and nest failure or abandonment due to noise and human presence during construction; this would be a significant impact. APM-BIO-03 commits SCE to monitoring construction activities to the extent feasible. APM-BIO-04 commits SCE to conducting pre-construction surveys for the coastal California gnatcatcher if construction activities occur during the avian nesting season; establishing an exclusionary buffer, in coordination with USFWS, if a nest is observed,; and full-time monitoring of construction activities in occupied habitat. Direct impacts would still be significant because APM-BIO-3 does not ensure proper monitoring protocols are followed and APM-BIO-04 would not require the established protocol to be used for gnatcatcher surveys. Indirect impacts to this species could result from habitat modifications through vegetation trimming, clearing of vegetation, and other ground-disturbing activities. The proposed project would include removal of approximately ~~14.23~~ 1.0 acres of coastal California gnatcatcher habitat. As described further in Table 4.3-4, temporary impacts to 1.89 acres of USFWS designated gnatcatcher critical habitat along Telecommunications Route 3 may occur. Indirect impacts would be significant."
4.3.3.3	Page 4.3-40 Lines 28-35	"Least Bell's vireo is a federally and state endangered species. It has been observed foraging within the proposed Mesa Substation site area and adjacent 500-kV transmission line corridor as well as nesting along portions of Telecommunications Route 3. Construction activities, such as clearing vegetation and grading within the proposed Mesa Substation site and along Telecommunications Route 3 could result in direct impacts, including injury or mortality to an individual least Bell's vireo or the loss of a nest as a result of human presence, dust, or noise. Construction activities could also result in indirect impacts such as the disruption of nesting or foraging behaviors or the loss of habitat. Impacts to least Bell's vireo would be significant."	Rationale: Least Bell's vireo was not observed foraging within the Mesa Substation site, as documented in Figure 5 of Appendix D of the DEIR. There was one observation of least Bell's vireo, during migration, within the nursery located in the adjacent 500-kV transmission corridor. The mulefat scrub lacks multi-level canopy required by this species. Further, the total acres of mulefat are smaller than the typical territory size for Least's Bell's vireo. SCE believes the habitat on site is marginal at best for least Bell's Vireo. In addition, it has never been observed foraging within this mulefat on site. On April 15, 2015, USFWS concurred that surveying the Mesa substation site was unnecessary given the lack of habitat. Given the lack of observations of this species on the Mesa Substation

Section	Page	DEIR Language	SCE Recommended Language
			site, SCE disagrees with the DEIR where it states that this species was "observed" foraging at the Mesa Substation site. The potential for direct impacts would only occur within the Telecommunications Route 3, which is why work in these areas is scheduled to occur in fall/winter only, when the species would be absent. SCE suggested "Least Bell's vireo is a federally and state endangered species. It has been observed foraging within the ~~proposed Mesa Substation site area and~~ adjacent 500-kV transmission line corridor during migration as well as nesting along portions of Telecommunications Route 3. Construction activities, such ~~as clearing vegetation and grading within the proposed Mesa Substation site and~~ along Telecommunications Route 3 could result in direct impacts, including injury or mortality to an individual least Bell's vireo or the loss of a nest as a result of human presence, dust, or noise. Construction activities could also result in indirect impacts such as the disruption of nesting or foraging behaviors or the loss of habitat. Impacts to least Bell's vireo would be significant."
4.3.3.3	4.3-42 Lines 5-9	"No burrowing owls or signs of burrowing owls were observed within the proposed project area during 2009 and 2010 protocol-level surveys, and no burrowing owls or signs were observed during general biological surveys during 2014 (Section 4.3.1.2)."	Rationale: Rare plant surveys conducted in 2015 covered the entirety of the proposed project area. Protocol rare plant surveys have similar requirements for distance between transects as burrowing owl surveys, and focus at looking at the ground. During these surveys, no burrows were identified as being large enough for burrowing owl. SCE recommends the following edits: "No burrowing owls or signs of burrowing owls were observed within the proposed project area during 2009 and 2010 protocol-level surveys, ~~and no burrowing owls or signs were observed~~ during general biological surveys during 2014 (Section 4.3.1.2), or during protocol rare plant surveys."
4.3.3.3	4.3-43 Lines 22-23	"Operation of the proposed project would be similar to ongoing maintenance activities of existing electrical infrastructure."	Rationale: This section should mention expressly that it includes "O&M activities related to Metropolitan's Middle Feeder." SCE recommends the following edits: "Operation of the proposed project would be similar to ongoing maintenance activities of existing electrical infrastructure and would include O&M activities related to MWD's relocated Middle Feeder."
4.3.3.3	4.3-49 Line 20	"…features within the proposed project area, approximately 3.7 acres may be permanently impacted,"	Rationale: Please update impact acreage to reflect actual project impacts currently undergoing permitting with applicable resource agencies. SCE recommends the following edits: "…features within the proposed project area, approximately ~~3.7~~ 0.37 acre waters of the US (USACE / RWQCB)

Section	Page	DEIR Language	SCE Recommended Language
			and 2.66 acres jurisdictional streambed and associated riparian habitat (CDFW) may be permanently impacted,"
4.3.4	4.3-55 Lines 29-30	"Preconstruction surveys shall be species and resource appropriate and typically conducted a maximum of 14 days prior to construction, as approved by the CPUC;"	Rationale: There is no justification for this high survey frequency outside of the nesting bird season. The potential for resources are seasonally dependent and should drive the interval between surveys. SCE recommends more specificity regarding seasons here. SCE recommends the following edits: "Preconstruction surveys shall be species and resource appropriate and typically conducted a maximum of 14 days prior to construction during the nesting bird season (February 1-August 31) and a maximum of 30 days prior to construction outside the nesting season (September 1-January 31), as approved by the CPUC;"
4.3.4	4.3-55 Lines 41-46	"In all locations of the project, construction activities, vehicular traffic (including movement of all equipment), and storage of construction materials shall be restricted to approved access roads and established construction areas indicated by flagging, fencing, and/or signage. The applicant shall ensure that exclusionary fencing is installed prior to the start of construction activities around laydown and work and staging areas, where necessary, to prevent inadvertent encroachment into the habitat adjacent to areas of impact."	Rationale: Mitigation Measures are meant to reduce biological impacts. Fencing requirements are only included as a mitigation measure because of the impact analysis for spadefoot toad along the telecommunications routes. Exclusionary fencing is typically used for listed reptiles and amphibians, and spadefoot toad is not listed. In addition, this mitigation measure actually increases biological impacts because fencing requires ground disturbance (i.e., digging) in areas that do not require it for construction. Flagging areas for avoidance and having a monitor present in these areas would be more effective because it would restrict vehicles to the disturbed, preferably unvegetated soils. The monitor would be able to check for toads and safely remove/protect any that enter work areas. SCE recommends the following edits: "In all locations of the project, construction activities, vehicular traffic (including movement of all equipment), and storage of construction materials shall be restricted to approved access roads and established construction areas indicated by flagging~~, fencing,~~ and/or signage. ~~The applicant shall ensure that exclusionary fencing is installed prior to the start of construction activities around laydown and work and staging areas, where necessary, to prevent inadvertent encroachment into the habitat adjacent to areas of impact.~~"
4.3.4	4.3-56 Lines 22-27	"All temporary disturbances to sensitive natural communities shall be restored with the pre-disturbance natural community. All other temporarily impacted areas shall be restored with coastal sage scrub if feasible and appropriate. Areas that do not provide habitat to coastal California gnatcatcher, other special-status species, or sensitive resources may be restored to the conditions agreed upon between the landowner and the applicant."	Rationale: SCE recommends modifying mitigation language to avoid contradictory measures. This measure categorizes temporary impacts to two types of plant communities: 1) sensitive (i.e., riparian and coastal sage scrub) that get restored to pre-disturbance conditions and 2) all other, non-sensitive communities that would get restored to the conditions agreed upon by the landowner. This measure can be interpreted as having to restore ruderal areas to coastal sage scrub. First, there is no evidence that the ruderal areas were historically coastal sage scrub. Second, this measure essentially requires mitigation for impacts already part of the existing conditions, namely ruderal plant communities, by requiring it to be converted to

Section	Page	DEIR Language	SCE Recommended Language
			high quality natural habitat. SCE recommends the following edits: "All temporary disturbances to sensitive natural communities shall be restored with the pre-disturbance natural community. ~~All other temporarily impacted areas shall be restored with coastal sage scrub if feasible and appropriate.~~ Areas that do not provide habitat to coastal California gnatcatcher, other special-status species, or sensitive resources may be restored to the conditions agreed upon between the landowner and the applicant."
4.3.4	4.3-56 Lines 31-33	"criteria to monitor and evaluate revegetation success (minimum of 4 years of monitoring and 80% cover for sensitive natural communities);"	Rationale: As documented in Appendix F of the DEIR, none of the sensitive natural communities have 80% native cover within their existing conditions. Some plant communities, such as coastal sage scrub, require more interstitial space between woody shrubs/trees. Therefore, SCE recommends lowering the prescriptive 80% cover for all plant communities to 70% cover to align with the project SWPPP requirements. The 80% cover may not be naturally achievable for a given plant community, and could result in areas becoming non-habitat for the listed and sensitive wildlife that the habitat restoration hopes to achieve. SCE recommends the following edits: "criteria to monitor and evaluate revegetation success (minimum of 4 years of monitoring and achieving establishment of 70~~80~~% relative cover for sensitive natural communities); and compensation and remedial measures to be implemented as needed."
4.3.4	4.3-56 Lines 35-42	"For sensitive natural communities, mitigation of permanent impacts shall occur after construction at a level of 1:1. In addition, permanent disturbances to coastal California gnatcatcher habitat that is not coastal sage scrub or another sensitive natural community shall be mitigated at a 1:1 ratio. 1. Establishing the natural community within the proposed project areas (onsite); 2. Establishing the natural community outside the proposed project areas (within one mile of the project area); or"	Rationale: Based on the protocol surveys, the habitat is tied to the coastal sage scrub onsite. The ruderal vegetation community in and of itself is not habitat for gnatcatcher, but in rare circumstances can provide habitat for gnatcatcher when there is adjacent coastal sage scrub. There is no regulatory framework in place to protect atypical or non-habitat for California gnatcatcher. This measure essentially requires mitigation for impacts already part of the existing conditions, namely ruderal plant communities, by requiring it be converted to high quality natural habitat. SCE recommends the following edits: "For sensitive natural communities, mitigation of permanent impacts shall occur after construction at a level of 1:1. In addition, permanent disturbances to coastal California gnatcatcher habitat that is not coastal sage scrub or another sensitive natural community shall be mitigated at a 1:~~1~~0.5 ratio. 1. Establishing the natural community with similar quality and conditions that currently exist within the proposed project areas (onsite); 2. Establishing the natural community with similar quality and conditions that currently exist outside the proposed project areas (within one mile of the project area); or"
4.3.4:	4.3-56 and 4.3-57 Lines	"For Options 1 and 2 (onsite and offsite), the plan shall specify restoration details, including that post-construction monitoring shall be performed for a minimum of four years, a success criteria of 80% cover shall be met, and remedial measures shall be implemented if success criteria are not met."	Rationale: As documented in Appendix F of the DEIR, none of the sensitive natural communities have 80% native cover within their existing conditions. Some plant communities, such as coastal sage scrub, require more interstitial space between woody shrubs/tree. Therefore, SCE recommends lowering the prescriptive 80% cover for all plant

Section	Page	DEIR Language	SCE Recommended Language
	45-46 and Lines 1-2		communities to 70% cover to align with the project SWPPP requirements. The 80% cover may not be naturally achievable for a given plant community, and could result in areas becoming non-habitat for the listed and sensitive wildlife that the habitat restoration hopes to achieve. SCE recommends the following edits: "For Options 1 and 2 (onsite and offsite), the plan shall specify restoration details, including that post-construction monitoring shall be performed for a minimum of four years, a success criteria of restoring native vegetation to the same pre-existing conditions, achieving establishment of 70 ~~80~~% relative cover. ~~shall be met, and r~~ Remedial measures shall be implemented if success criteria are not met."
4.3.4	4.3-57 Lines 19-21	"Trimming of native trees and native arborescent shrubs shall be completed outside of the nesting bird season and shall be monitored by a qualified biologist."	Rationale: Please modify language to allow the trimming of vegetation outside of the nesting bird season without monitoring requirements. SCE recommends the following edits: "Trimming of native trees and native arborescent shrubs shall be completed outside of the nesting bird season ~~and shall be monitored by a qualified biologist~~."
4.3.4	4.3-57 Lines 27-29	"This plan shall be developed in consultation with CDFW and CPUC and shall be provided to these agencies for review and comment."	Rationale: Please update listed reviewing agencies to be more inclusive for consultation. SCE recommends the following edits: "This plan shall be developed as required by agency permits and in consultation with ~~CDFW and~~ CPUC and shall be provided to these agencies for review and comment."
4.3.4	4.3-57 Lines 42-44	• "Vehicle and equipment wash stations (mobile or built in place) shall be erected at strategic locations on the ROW where designated weed species have been detected, and where doing so would help prevent the spread of these species."	Rationale: The Mesa project lies within the same weed zone so it is unclear what the purpose of washing will do when moving from one part of the project to the other. Mesa consists almost entirely of invasive species that are ubiquitous throughout the project area. Adding water to the site, even when contained to wash stations, has the potential to increase biological impacts since annual invasive species can be expected to increase near the wash stations. SCE recommends the following edits: • "~~Vehicle and equipment wash stations (mobile or built in place) shall be erected at strategic locations on the ROW where designated weed species have been detected, and where doing so would help prevent the spread of these species.~~"
4.3.4	4.3-58 Lines 3-5	"All temporary disturbance areas that will be restored post-construction shall be monitored for invasive species establishment on a monthly basis for at least one year after project restoration is completed."	Rationale: SCE recommends a less prescribed survey schedule, since the growing season for annual invasive plants is not year-round and tied to rains (the Santa Barbara County Reliability Project FEIR approved monitoring on a quarterly basis). Furthermore, much of the existing plant communities are not native and/or dominated by invasive species. The language in the current DEIR sounds like it is trying to mitigate for impacts that have previously occurred. SCE proposes to restore the sites to their existing condition (i.e., weed communities) and proposes monitoring for

Section	Page	DEIR Language	SCE Recommended Language
			detecting new weeds that are not currently part of the existing plant community. SCE recommends the following edits: "All temporary disturbance areas that will be restored to pre-construction condition during post-construction shall be monitored for ~~invasive species~~ establishment of new invasive species on a monthly basis ~~during the growing season and on a quarterly basis outside of the growing season~~ ~~basis~~ for at least one year after project restoration is completed."
4.3.4	4.3-58 Lines 23-35	"The project shall be designed to avoid impacts on occurrences of Nevin's barberry during construction and operation and maintenance. Prior to the start of construction, the applicant's CPUC-approved qualified biologist shall complete pre-construction surveys in suitable habitat during the appropriate blooming period to identify any occurrences. Where Nevin's barberry occurs, all construction and operation and maintenance activities shall occur outside a restrictive buffer, which shall be established by a CPUC-approved qualified biologist. Vehicles and crew members shall be prohibited from coming within 200 feet of identified Nevin's barberry unless a buffer reduction is approved by the CPUC after consultation with USFWS. A reduced buffer shall be a minimum of 25 feet or greater from a Nevin's barberry plant. A qualified biologist approved by the CPUC shall monitor crew members and the Nevin's barberry to ensure all project activities stay away from Nevin's barberry within the buffer. The biologist shall have the authority to halt work if it is determined that Nevin's barberry could be impacted."	Rationale: This mitigation measure in the DEIR will result in greater impacts. SCE disagrees with the biological justification of the 200-foot buffer prohibition for staff and vehicles for Nevin's Barberry. The individual plant is located within 15 feet of an existing and maintained access road. Since this is a relatively disturbed area with recreation activity related to the nature center, it is not clear how SCE's activity is a cumulative significant impact that necessitates this mitigation buffer requirement. The proposed mitigation measure would require a 25-foot to 200-foot buffer, which would require a new road, resulting in impacts to nesting habitat for least Bell's Vireo and California Gnatcatcher. The mitigation measure should be designed to reduce impacts to less than significant. In this case, the measure would increase the proposed project impacts by requiring additional mitigation to protect the other listed species that would be directly affected by the buffer restriction. The project botanist believes the Nevin's Barberry was planted by the nature center for their garden and is not naturally occurring; indeed, there is a sidewalk, likely on top of its root system, and evidence of trimming to keep the plant off the sidewalk. Therefore, SCE's proposes using the existing access road past the barberry as having a less than significant impact. The proposed minimum 25-foot buffer, because a buffer of this size, would require constructing a new road to access the telecommunication tie-in location. Protocol surveys have already been conducted within suitable habitat, using CDFW protocol (Appendix F). Given Nevin's barberry is a shrub, it is readily and easily identifiable. Therefore, protocol surveys conducted in 2015 sufficiently meet the requirements of this MM to survey for the species because the species is observable year-round and was conducted during the "appropriate blooming period." It is highly unlikely that a new individual would be found during pre-construction surveys because field surveys in 2014 and CDFW protocol surveys in 2015 only identified the one individual. Note: Only one other individual was identified in the parking lot planter of the nature center, but this is outside the survey area. The surveys conducted for this DEIR have sufficiently identified barberry in suitable habitat within the project area; a third survey is highly unlikely to identify additional individuals. A "biologist" is too general of a term. Instead, the botanist title should be used to identify species and determine impacts and better understand impacts to woody plants. SCE recommends the following edits: "The project shall be designed to avoid impacts on occurrences of Nevin's barberry during construction and operation and maintenance. Prior to the start of construction, the applicant's CPUC-approved qualified ~~biologist~~ botanist shall flag ~~complete pre-construction surveys in suitable habitat during the appropriate blooming period to identify any~~ occurrences previously identified by protocol plant surveys. Unless otherwise

Section	Page	DEIR Language	SCE Recommended Language
			specified by the USFWS, where Nevin's barberry occurs, all ground disturbing or pole maintenance work during construction and operation and maintenance activities shall occur outside a restrictive buffer ~~of 25 feet; however, trucks may drive past the individuals wherever existing access roads have already been established farther than 15 feet away from a given plant,. Vehicles and crew members shall be prohibited from coming within 200 feet of identified Nevin's barberry unless a buffer reduction is approved by the CPUC~~ as determined after consultation with USFWS. A reduced buffer shall be a minimum of 25 feet or greater from a Nevin's barberry plant. A qualified botanist ~~biologist~~ approved by the CPUC shall monitor crew members and the Nevin's barberry to ensure all project activities comply with the USFWS requirements established through consultation ~~stay away from Nevin's barberry within the buffer~~. The ~~biologist~~ botanist shall have the authority to halt work if it is determined that Nevin's barberry could be impacted."
4.3.4;	4.3-58 and 4.3-59 Lines 41-49 and Lines 1-45	**"MM BR-7: Restoration of Southern California Black Walnut.** SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of current engineering design design of project features), black walnut tree evaluation surveys shall be completed by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist must be approved by the CPUC. The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots. California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 3:1 ratio. If the diameter at breast height of the tree to be removed is 24 inches or less, it shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established. Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC, and in consultation with USFWS and CDFW. Replacement trees shall be planted before tree removal, or if not feasible or if potentially harmful to the replacement trees, as soon as possible after removal. **MM BR-8: Restoration of Special-status Plants.** The applicant shall complete pre-construction surveys during the appropriate blooming period to identify special-status plants, including Plummer's mariposa lily, intermediate mariposa lily, and California tarplant populations in the proposed project component areas where suitable habitat is present. Special-status plants shall be identified by a qualified biologist and flagged or surrounded with fencing in such a way that disturbance of the populations or individuals shall be avoided. In the event that populations or individuals cannot be avoided, the applicant shall develop and implement a restoration plan for each	Rationale: California walnut is a rare plant subject to the same regulatory framework as the plants listed in MM BR-8. By including separate measures for walnut in MM BR-7, there is a potential conflict in the mitigation measures. Notably MM BR-7 implies surveys only for existing walnut trees, whereas MM BR-8 would require surveys for new previously undocumented walnut trees. Likewise, MM BR-8 allows for the purchase of credits for rare plants, including walnut because it is a rare plant, whereas MM BR-7 does not specify that walnut can be mitigated through the purchase of credits. The same problem does not exist for Nevin's barberry (MM BR-6) because it is listed. However, the mitigation of individual walnut trees should be consistent with all other rare plants. This includes an option to allow for off-site mitigation through a mitigation bank. This would give SCE the flexibility to avoid planting trees under power lines. Using this rationale, SCE recommends deleting MM BR-7 and incorporating elements of it within MM BR-8. In addition, MM BR-7 contradicts Line 44 of Page 4.3-32 of the Impact Analysis, which states walnut trees will be replaced at a 2:1 ratio. The MM requires more than what the impact analysis determined as needed. Further, walnut trees are not listed under the federal Endangered Species Act nor the California Endangered Species Act; therefore, the USFWS does not have jurisdiction over this species and only CDFW has jurisdiction over individual trees when present within a drainage. Therefore, USFWS needs to be removed and CDFW's involvement with reviewing walnut modified to be stream specific. SCE recommends the following edits: ~~**"MM BR-7: Restoration of Southern California Black Walnut.** SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of current engineering design design of project features), black walnut tree evaluation surveys shall be completed by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist must be approved by the CPUC. The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots.~~

Section	Page	DEIR Language	SCE Recommended Language
		plant, which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. CPUC approval is required before the plan is implemented. For temporary impacts to special-status plants, restoration shall occur after construction and to an extent such that "no net loss" is ensured for all special-status plants in the proposed project component areas. The number of plants at seven years will be equal to or greater than the number destroyed. Mitigation for permanent impacts shall be completed by: 1. Establishing individual plants within the proposed project areas (onsite); 2. Establishing individual plants outside the project areas (offsite); or 3. Purchase of credits and/or mitigation lands at a ratio of 2:1 from an entity approved by CDFW. For Options 1 and 2 (establishing plants onsite or offsite), the plan shall include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration (seven years) and performance criteria (no-net loss); and any specific measures that will be required to ensure success of the restoration effort."	~~California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 3:1 ratio. If the diameter at breast height of the tree to be removed is 24 inches or less, it shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established.~~ ~~Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC, and in consultation with USFWS and CDFW. Replacement trees shall be planted before tree removal, or if not feasible or if potentially harmful to the replacement trees, as soon as possible after removal.~~ **MM BR-8: Restoration of Special-status Plants.** The applicant shall complete pre-construction surveys during the appropriate blooming period to identify special-status plants, including Plummer's mariposa lily, intermediate mariposa lily, and Southern California tarplant populations in the proposed project component areas where suitable habitat is present. ~~Special-status plants shall be identified by~~ If pre-construction surveys find special-status plants, ~~a qualified biologist and~~ they will be flagged or surrounded with fencing in such a way that disturbance of the populations or individuals shall be avoided. In the event that populations or individuals cannot be avoided, the applicant shall develop and implement a restoration plan for each plant, which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. CPUC approval is required before the plan is implemented. Additionally, SCE will coordinate with MWD with respect to planting locations to ensure there is no effect on MWD O&M activities with regards to the relocated Middle Feeder. In addition, SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of current engineering design design of project features), black walnut trees identified in the impact area will be evaluated by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots. California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 2:1 ratio. Tree removal shall not be permitted until a detailed plan for restoration, is approved by the CPUC. For temporary impacts to special-status plants, restoration shall occur after construction and to an extent such that "no net loss" is ensured for all special-status plants in the proposed project component areas. The number of plants at seven years will be equal to or greater than the number destroyed. Mitigation for permanent impacts shall be completed by: 1. Establishing individual plants within the proposed project areas (onsite);

Section	Page	DEIR Language	SCE Recommended Language
			2. Establishing individual plants outside the project areas (offsite); or 3. Purchase of credits and/or mitigation lands at a ratio of 2:1 from an entity approved by CDFW. For Options 1 and 2 (establishing plants onsite or offsite), the plan shall include the following elements: planting/seeding palettes; monitoring and contingency program monitoring schedule, including duration (seven years) and performance criteria (no net loss); and any specific measures that will be required to ensure success of the restoration effort. Also for Options 1 and 2, removed walnut trees that have 24 inches or less diameter at breast height shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established. For option 1, the replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area.”
4.3.4	4.3-58 Lines 41-43	“SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens.”	Rationale: If CPUC dismisses SCE’s recommendation to merge MM BR-7 in to MM BR-8, please consider an option to allow for off-site mitigation through a mitigation bank, given that it would be best not to plant trees under power lines. SCE recommends the following edits: “SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees or purchase credits at a mitigation bank for any impacted or removed specimens.”
4.3.4	4.3-59 Lines 5-6	“California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 3:1 ratio.”	Rationale: If CPUC dismisses SCE’s recommendation to merge MM BR-7 in to MM BR-8, please consider the following recommendation: The impact analysis (Line 44 of Page 4.3-32) states 2:1 replacement. This appears to contradict with the mitigation measure language which indicates a 3:1 ratio. SCE recommends the following edits: “California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a ~~3:1~~2:1 ratio.”
4.3.4	4.3-59 Lines 14-15	“Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC, and in consultation with USFWS and CDFW.”	Rationale: If the CPUC dismisses SCE’s recommendation to merge MM BR-7 in to MM BR-8, please consider the following recommendation: Walnut trees are not listed under the federal Endangered Species Act nor the California Endangered Species Act; therefore, neither USFWS, nor CDFW have jurisdiction over these species (except when they are in a drainage they could be subject to a CDFW streambed alteration agreement).

Section	Page	DEIR Language	SCE Recommended Language
			SCE recommends the following edits: "Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC ~~and in consultation with USFWS and CDFW~~."
4.3.2	4.3-60 Lines 26-29	"The nesting bird management plan shall include measures and an adaptive management program to avoid and minimize impacts to special-status and MBTA-California Fish and Game Code-protected bird species during nesting periods during project construction."	Rationale: The purpose of a nesting bird management plan is to address species that are not otherwise mitigated through a state or federal take permit, thereby satisfying the regulatory framework of the Migratory Bird Treaty Act and the California Department of Fish and Game code, Section 3503, 3503.5 and 3513. As such, it is the Federal Biological Opinion and State Incidental Take Permit that includes measures and adaptive management for listed special-status species. It is those permits and not the nesting bird management plan that have authority over listed species. The nesting bird management plant should acknowledge the mitigation measures, nest buffers, and guidance within the permits rather than establishing its own set of measures and adaptive management. SCE recommends the following edits: "The nesting bird management plan shall include measures and an adaptive management program to avoid and minimize impacts to special-status <u>species not listed pursuant to the ESA or CESA</u> and MBTA-California Fish and Game Code-protected bird species during nesting periods during project construction."
4.3.2	4.3-60 Lines 35-36	"If pre-construction survey protocols exist for a certain species, the plan shall outline the implementation of these protocols"	Rationale: Clarification. There is no need to create a new outline for complying with protocol. Referencing, the protocol suffices as the standard that will be followed. SCE recommends the following edits: "If pre-construction survey protocols exist for a certain species, the plan shall <u>reference</u> ~~outline~~ the implementation of these protocols"
4.3.2	4.3-60 Lines 39-41	"Language for buffer reduction process will be included in the plan, which shall include coordination with the appropriate wildlife agencies and the CPUC if reducing the buffer of a raptor or special-status species."	Rationale: In order to streamline the process of creating nesting bird management plans for SCE projects, the CPUC convened a technical working group for the West of Devers project consisting of representatives from USFWS, CDFW, BLM, CPUC, and SCE. The resulting nesting bird management plan approved by the agencies is now being used as a template for future SCE projects. SCE intends to use the template for this project and strongly recommends that the mitigation measures reflect the contents of this agency-approved template. Accordingly, raptors should be treated like other non-special status species in regards to buffer reductions and not like special-status species. SCE recommends the following edits: "Language for buffer reduction process will be included in the plan, which shall include coordination with the appropriate wildlife agencies and the CPUC if reducing the buffer of a ~~raptor or~~ special-status species."
4.3.2	4.3-60 and	"Language specifying that determinations of appropriate and effective buffers between construction activities and identified nests can be made in the project construction area by the CPUC-approved biological monitor (qualified in accordance with nesting bird plan standards, which will include	Rationale: The CPUC convened a technical working group for the West of Devers project consisting of representatives from

Section	Page	DEIR Language	SCE Recommended Language
	4.3-61 Lines 45-47 and Lines 1-2	specific requirements for education and experience in conducting biological surveys and with specific birds in the project area).”	USFWS, CDFW, BLM, CPUC, and SCE. The result of this working group was an agreement regarding the levels of experience that would not require minimum levels of education. SCE recommends the following edits: “Language specifying that determinations of appropriate and effective buffers between construction activities and identified nests can be made in the project construction area by the CPUC-approved biological monitor (qualified in accordance with nesting bird plan standards, which will include specific requirements for ~~education and experience in~~ conducting biological surveys and with specific birds in the project area).”
4.3.4	4.3-61 Lines 31-40	“In the event that coastal California gnatcatchers are observed during pre-construction surveys, a qualified biologist must identify the boundaries of the pair’s territory and SCE must not conduct construction activities within 500 feet of the territory, or as otherwise approved by the CPUC, in consultation with USFWS and CDFW. SCE shall notify USFWS and CDFW in the event gnatcatcher territory or nest sites are confirmed by surveys, immediately upon return from the field. If infeasible to maintain a buffer of 500 feet (or a distance otherwise approved by USFWS and CDFW), by installing temporary flagging or fencing, from an active gnatcatcher territory, construction activities within or near these areas will be performed outside the breeding and nesting season (coastal California gnatcatcher breeding/nesting season is approximately February 1 through August 30).”	Rationale: CDFW has jurisdiction over California Gnatcatcher only through Department of Fish and Game code, Section 3503, 3503.5 and 3513; the California Endangered Species Act does not apply to this species. Therefore, only USFWS requires consultation with regards to approving construction within established buffers, consistent with Federal ‘take’ permits. SCE recommends the following edits: “In the event that coastal California gnatcatchers are observed during pre-construction surveys, a qualified biologist must identify the boundaries of the pair’s territory and SCE must not conduct construction activities within 500 feet of the territory, or as otherwise approved by the USFWS~~CPUC~~, with documentation of the~~in~~ consultation with USFWS provided to the CPUC ~~and CDFW~~. SCE shall notify USFWS and CDFW in the event gnatcatcher territory or nest sites are confirmed by surveys, immediately upon return from the field. If infeasible to maintain a buffer of 500 feet (or a distance otherwise approved by USFWS ~~and CDFW~~), by installing temporary flagging or fencing, from an active gnatcatcher territory, construction activities within or near these areas will be performed outside the breeding and nesting season (coastal California gnatcatcher breeding/nesting season is approximately February 1 through August 30).”
4.3.4	4.3-61 Lines 46-48	“Prior to construction, SCE shall complete protocol-level surveys for least Bell’s vireo in areas of suitable or potentially suitable habitat within the proposed component areas.”	Rationale: “Prior to construction” needs to be clarified because this species is migratory and absent during certain portions of the year. Therefore, protocol surveys cannot be conducted outside the breeding season because 1) it violates the timing specified by the protocol and 2) the species would be absent. “Suitable or potentially suitable habitat” is subjective; rather the locations should be grounded in published research and protocols defining habitat conditions. SCE recommends the following edits: “Prior to construction and within their breeding season (generally April 1-August 31), SCE shall complete protocol-level surveys for least Bell’s vireo in native riparian ~~areas~~ habitat ~~of suitable or potentially suitable habitat~~ within the proposed component areas, unless otherwise agreed upon by USFWS and CDFW.”
4.3.4	4.3-62 Lines	“In the event that least Bell’s vireo territory or nest sites are confirmed, SCE shall notify the USFWS and CDFW immediately upon return from the field.”	Rationale:

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
	1-3		SCE proposes adding defined timeframes for agency notifications. SCE recommends the following edits: "In the event that least Bell's vireo territory or nest sites are confirmed, SCE shall notify the USFWS and CDFW ~~immediately~~ within 48 hours upon return from the field."
4.3.4	4.3-62 Lines 13-16	1. "In those areas where riparian vegetation is required to be removed, SCE shall work with a qualified botanist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ."	Rationale: SCE will minimize impacts to areas where riparian vegetation does not need to be removed as part of construction. The measure, as it stands, may conflict with the project description, which requires removal of riparian vegetation on the substation site. SCE recommends the following edits: ~~1. In those areas where riparian vegetation is required to be removed, SCE shall work with a qualified botanist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ~~."
4.3.4	4.3-62 Lines 32-38	**"MM BR-15: Avian Protection Plan.** SCE shall adhere to recommendations published by APLIC (Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012). In addition SCE shall develop and implement an Avian Protection Plan according to Avian Protection Plan Guidelines (APLIC and USFWS 2005). The plan shall include provisions to reduce impacts on avian species during operation of the proposed project, and shall provide for the adaptive management of project-related issues. The plan shall be submitted for review to CDFW, USFWS, and the CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented."	Rationale: SCE has a company-wide Avian Protection Plan (APP) that has previously been provided to USFWS. The APP is company-wide to allow for consistent management of protected bird species throughout SCE's territory. SCE's APP provides the company with the means to comply with state and federal laws protecting birds for CEQA and non-CEQA projects. As APPs, in general, are not project specific, the existing company-wide plan will be implemented for Mesa. SCE recommends the following edits: "**MM BR-15: Avian Protection Plan.** SCE shall adhere to recommendations published by APLIC (Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012). ~~In addition SCE shall develop and implement an~~ SCE will implement the USFWS approved company-wide Avian Protection Plan according to Avian Protection Plan Guidelines (APLIC and USFWS 2005). ~~The plan shall include provisions to reduce impacts on avian species during operation of the proposed project, and shall provide for the adaptive management of project-related issues. The plan shall be submitted for review to CDFW, USFWS, and the CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented.~~"
CULTURAL & PALEONTOLOGICAL RESOURCES			
4.4 Cultural and Paleontological Resources	4.4-1 Line 10	"Cultural resources discussed in this section include historic resources, archeological resources…"	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits:

Section	Page	DEIR Language	SCE Recommended Language
			"Cultural resources discussed in this section include historical resources, archeological resources…"
4.4	4.4-1 Lines 14-23	"Historic Resources: The California Environmental Quality Act (CEQA) defines historic resources as resources that are listed on, or determined to be eligible for listing on, the California Register of Historical Resources (CRHR) 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). According to the CEQA Guidelines, a historic resource may be an object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in terms of California's architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records. Typically, in order to be considered historic for purposes of listing, a resource must be at least 50 years old."	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: "Historical Resources: The California Environmental Quality Act (CEQA) defines historical resources as resources that are listed on, or determined to be eligible for listing on, the California Register of Historical Resources (CRHR) or a local register, or are otherwise determined to be historical pursuant to CEQA or the CEQA Guidelines (Public Resources Code [PRC] § 21084.1 or Code of Regulations, Title 14, § 15064.5, respectively). According to the CEQA Guidelines, a historical resource may be an object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in terms of California's architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records. Typically, in order to be considered historical for purposes of listing, a resource must be at least 50 years old."
4.4	4.4-1 Line 24	"Archaeological Resources: Archaeological resources may be considered historic…."	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: "Archaeological Resources: Archaeological resources may be considered historical…."
4.4.1.2	4.4-6 Line 34	"To determine the potential for built environment historic resources, ASM reviewed current and…"	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: "To determine the potential for built environment historical resources, ASM reviewed current and…"
4.4.1.2	4.4-7 Line 20	"…because no potential built environment historic resources were identified in examination of aerial…"	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: "…because no potential built environment historical resources were identified in examination of aerial…"
4.4.1.3	4.4-10 Line 45	states: …considered historic resources under CEQA.	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1.,

Section	Page	DEIR Language	SCE Recommended Language
			Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: "…considered historical resources under CEQA."
Table 4.4-1	4.4-11	Table footnote states: "CRHR California Register of Historic Resources"	Rationale: Please revise to correct name of inventory (PRC 5024.1). SCE recommends the following edits: "CRHR California Register of Historical Resources"
Table 4.4-2	4.4-12	Table footnote states: "CRHR California Register of Historic Resources"	Rationale: Please revise to correct name of inventory (PRC 5024.1). SCE recommends the following edits: "CRHR California Register of Historical Resources"
Table 4.4-3	4.4-13	Table footnote states: "CRHR California Register of Historic Resources"	Rationale: Please revise to correct name of inventory (PRC 5024.1). SCE recommends the following edits: "CRHR California Register of Historical Resources"
4.4.1.3	4.4-13 Line 20	"NRHP/CRHR eligibility (Williams 2014). Additionally, Historic Resource Analysis Reports/Historic…"	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: "NRHP/CRHR eligibility (Williams 2014). Additionally, Historical Resource Analysis Reports/Historic…"
Table 4.4-4	4.4-14	Table footnote states: "CRHR California Register of Historic Resources"	Rationale: Please revise to correct name of inventory (PRC 5024.1).

Section	Page	DEIR Language	SCE Recommended Language
			SCE recommends the following edits: CRHR California Register of Historical Resources
4.4.2.1	4.4-19 Lines 2-3	"Sections of the proposed project would require a permit from the United States Army Corps of Engineers under Section 408"	Rationale: SCE has had communications with the Army Corps of Engineers and they have indicated that a 408 permit is not required, pending official documentation SCE recommends the following edits: "Sections of the proposed project would likely not require a permit from the United States Army Corps of Engineers under Section 408"
4.4.2.2	4.4-20 Line 14	"…groups, and citizens in identifying the existing historic resources of the State and to indicate which…"	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: "…groups, and citizens in identifying the existing historical resources of the State and to indicate which…"
4.4.3.3	4.4-26 Lines 2-7	"No historic or archeological sites were identified during a record search or pedestrian surveys at the proposed project area for proposed transmission structure replacement in the City of Commerce or at the proposed conversion of the street light conductors from overhead to underground within the City of Bell Gardens. Therefore, impacts related from construction of the transmission structure or conversation of the street light conductors would be less than significant under this criterion."	Rationale: No historic or archaeological sites were identified in the South Area; therefore, there would be no impacts. This approach is consistent with "no impact" statements for the "Mesa 500-kV Substation Site Area" (Page 4.4-24; Line 22), "Telecommunications Routes (Page 4.4-24; Line 40), "Existing Substation Modifications" (Page 4.4-25; Line 25, 33, and 40), and "North Area" (Page 4.4-25; Line 47). SCE recommends the following edits: "No historic or archeological sites were identified during a record search or pedestrian surveys at the proposed project area for proposed transmission structure replacement in the City of Commerce or at the proposed conversion of the street light conductors from overhead to underground within the City of Bell Gardens. Therefore, there would be no impacts related from construction of the transmission structure or ~~conversation~~ conversion of the street light conductors ~~would be less than significant under this criterion~~."
4.4.3.3	4.4-26 Line 45	"…potential to directly or indirectly impact a historic resource. Therefore, operations and…"	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age.

Section	Page	DEIR Language	SCE Recommended Language
			SCE recommends the following edits: "…potential to directly or indirectly impact a historical resource. Therefore, operations and…"
4.4.3.3	4.4-27 Lines 23-24	"The remainder of activities would not result in ground disturbance and would not have the potential of damaging an undiscovered resource unless it was on the ground surface. Damage to a previously undiscovered surface resource would be a significant impact. MM CR-3 would be implemented to protect previously undiscovered resources. Impacts would be less than significant with mitigation."	Rationale: A significant impact would occur if the damaged surface resource was determined to be a historical resource through implementation of "MM CR-3: Determination if a resource is a historical resource". If the resource is found to not be a historical resource then no significant impact would occur. SCE recommends the following edits: "The remainder of activities would not result in ground disturbance and would not have the potential of damaging an undiscovered resource unless it was on the ground surface. Damage to a previously undiscovered surface resource ~~would~~ could be a significant impact. MM CR-3 would be implemented to protect previously undiscovered resources. Impacts would be less than significant with mitigation."
Impact CR-2	4.4-27 Line 3	"…would be no potential to directly or indirectly impact an undiscovered historic or archaeological…"	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: "…would be no potential to directly or indirectly impact an undiscovered historical or archaeological…"
4.4.4	4.4-29 Lines 30-37	**"MM CR-1: Flag and Avoid Known Unevaluated Historic Sites.** Prior to commencement of any construction or construction-related activities within 50 feet of the mapped boundaries of (1) the historic-era debris and concrete structure at site P-19-186889 and (2) the concrete footings and shack at site SAY-S-1, a qualified CPUC-approved archaeologist shall erect flagging to create a 50-foot buffer around these resources. Flagging shall be in a bright, easily visible color, and signs shall be posted at the perimeter of the flagged areas on all sides to indicate that construction equipment, materials, and personnel shall stay out of the flagged areas. Flagging and signage shall stay in place until all construction activities within 50 feet of the resources has been completed."	Rationale: Please change buffer dimension from 50 feet to 10 feet to be consistent will the 10-foot buffer dimension stated in Chapter 4.4 Cultural and Paleontological resources on page 4.4-25 Line 5 and page 4.4-26 Line 21-22. Please add language stating that if the resource elements are found to not be historical resources or do not contribute to the eligibility of a historical resource then no additional management (i.e., erecting flagging) of the resource is needed during construction. SCE recommends the following edits: **"MM CR-1: Flag and Avoid Known Unevaluated Historic Sites.** Prior to commencement of any construction or construction-related activities within ~~50~~ 10 feet of the mapped boundaries of (1) the historic-era debris and concrete structure at site P-19-186889 and (2) the concrete footings and shack at site SAY-S-1, a qualified CPUC-approved archaeologist shall erect flagging to create a ~~50~~10-foot buffer around these resources. Flagging shall be in a bright, easily visible color, and signs shall be posted at the perimeter of the flagged areas on all sides to indicate that construction equipment, materials, and personnel shall stay out of the flagged areas. Flagging and signage shall stay in place until all construction activities within ~~50~~ 10 feet of the resources has been completed. If the historic-era debris and concrete structure at site P-19-186889 are evaluated and found not to be a historical resource or not contribute to the eligibility of a historical resource, no further management is required during construction. If the

Section	Page	DEIR Language	SCE Recommended Language
			concrete footings and shack at site SAY-S-1 are evaluated and found not to be a historical resource or not contribute to the eligibility of a historical resource, no further management is required during construction.”
4.4.4	4.4-30 Lines 9-14	“**MM CR-3: Previously Unidentified Cultural Resources.** If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an “environmentally sensitive area.” Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/archaeologist qualified archaeologist and the CPUC shall be notified immediately.	Rationale: Please include notification of SCE to allow for efficient coordination. SCE recommends the following edits: **“MM CR-3: Previously Unidentified Cultural Resources.** If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an “environmentally sensitive area.” Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/~~archaeologist~~ qualified archaeologist, SCE, and the CPUC shall be notified immediately.”
4.4.4	4.4-30 Lines 16-24	“Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist determines that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center.”	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. SCE recommends the following edits: “Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist and SCE determine~~s~~ that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist and SCE shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center.”
4.4.4	4.4-30 Lines 26-31	**“Determination if a resource is an historical resource.** The CPUC-approved cultural resources specialist/qualified archaeologist, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historic resource, the qualified archaeologist shall prepare an Evaluation Plan.”	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: “Determination if a resource is an historical resource. The CPUC-approved cultural resources specialist/qualified archaeologist and SCE, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historical resource, the qualified archaeologist and SCE shall prepare an Evaluation Plan.”

Section	Page	DEIR Language	SCE Recommended Language
4.4.4	4.4-30 Lines 32-48	**"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 shall 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 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."	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age SCE recommends the following edits: **"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 historical 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 shall 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 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."
4.4.4	4.4-31 Lines 1-12	**"Data Recovery Plan.** Data Recovery Plans for historic 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 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."	Rationale: Please change "historic" to "historical" to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age SCE recommends the following edits: **"Data Recovery Plan.** Data Recovery Plans for 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 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."
4.4.4	4.4-31 Lines 35-40	"**MM CR-4: Paleontological Resources Monitoring.** Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor all ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-7."	Rationale: Please remove "all" to be consistent with language for MM CR-4 as described on page 4.4-28 Lines 19-22, which does not specify that all ground-disturbing activities within areas of moderate to high potential for paleontological resources will be monitored. Please include reference to the Paleontological Resource Management Plan (PRMP), which will provide details about monitoring and discovery protocols. The PRMP will be reviewed and approved by

Section	Page	DEIR Language	SCE Recommended Language
			the CPUC prior to the start of construction. SCE recommends the following edits: **"MM CR-4: Paleontological Resources Monitoring.** Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor ~~all~~ ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources, per the Paleontological Resources Management Plan (APM-CUL-01) reviewed and approved by the CPUC prior to of construction. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-~~7~~5."
4.4.4	4.4-31 Lines 42-46	"**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 discovery can be avoided and no further impacts will occur, no further effort shall be required."	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. SCE recommends the following edits: "**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 consult with the applicant to determine whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required."
4.4.4	4.4-32 Lines 15-21	"If the resource is unique, then work shall remain stopped, and the approved paleontologist shall consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist determines that another method would provide superior mitigation of impacts to the resource."	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. Reference to the cultural resources specialist/qualified archaeologist appears to be a typo. SCE recommends the following edits: "If the resource is unique, then work shall remain stopped, and the approved paleontologist shall consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved ~~cultural resources specialist/qualified archeologist~~ paleontologist in consultation with the applicant determines that another method would provide superior mitigation of impacts to the resource."
GEOLOGY			
4.5.2.1	4.5-19 Lines 41-49	"As authorized by Section 402 of the Clean Water Act, the California State Water Resources Control Board administers the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (General Construction Activity NPDES Storm Water Permit, 2009-0009-	Rationale: Please modify to make consistent with Hydrology and Water Quality analysis.

Section	Page	DEIR Language	SCE Recommended Language
		DWQ and 2010-0014-DWQ) that covers a variety of construction activities that could result in wastewater discharges. Under this General Permit, the state issues a construction permit for projects that disturb more than 1 acre of land."	SCE recommends the following edits: "As authorized by Section 402 of the Clean Water Act, the California State Water Resources Control Board administers the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (General Construction Activity NPDES Storm Water Permit, 2009-0009-DWQ and 2010-0014-DWQ DWQ and 2012-0006-DWQ)) that covers a variety of construction activities that could result in wastewater discharges. Under this General Permit, the state issues a construction permit for projects that disturb ~~more than~~ 1 acre or more of land."
GREENHOUSE GASSES			
4.6.2.1	4.6-6 Lines 6-8	"The Final GHG Tailoring Rule, established in May 2010, sets thresholds for GHG emissions that define when permits under the New Source Review, Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities."	Rationale: Please update language to clarify the agency responsible for implementation of ruling added in EPA. SCE recommends the following edits: "The Final GHG Tailoring Rule, established by the EPA in May 2010, sets thresholds for GHG emissions that define when permits under the New Source Review, Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities."
Table 4.6-5	4.6-14	"EO S-01-07—Low Carbon Fuel Standard Fuels purchased for the project would be required to comply with the Low Carbon Fuel Standard."	Rationale: Please delete this row in the Table as it is not a Plan, Policy or Regulation. It is a measure of AB32 which is already listed. The narrative for AB32 specifically mentions Low Carbon Fuel Standard. SCE recommends the following edits: "~~EO S-01-07—Low Carbon Fuel Standard~~ ~~Fuels purchased for the project would be required to comply with the Low Carbon Fuel Standard.~~"
HAZARDS			
4.7.2.1	4.7-16 Lines 27-28	"A RCRA-regulated hazardous waste exhibits at least one of four characteristics: ignitability, corrosivity, reactivity, or toxicity."	Rationale: Please update RCRA Hazardous Waste description to make complete. SCE recommends the following edits: "A RCRA-regulated hazardous waste is either found on a pre-determined list or exhibits at least one of four characteristics: ignitability, corrosivity, reactivity, or toxicity."
4.7.2.3	4.7-25	"It is anticipated that these poles would either be reused or disposed of at Savage Canyon Landfill,	Rationale:

Section	Page	DEIR Language	SCE Recommended Language
	Lines 5-8	the only landfill identified by the applicant for the proposed project that can accept treated wood waste (CalRecycle 2016, SCE 2015b) as discussed further in Section 4.12, "Public Services and Utilities.""	Please modify language to reflect SCE's waste disposal process. SCE disposes of wood poles through Waste Management, Inc. and the contract limits locations where the wood poles can be disposed. Savage Canyon is not a facility utilized by SCE for wood poles and any additional locations must be approved through a contract Change Order. Additionally, Savage Canyon only accepts waste from within the Whittier city limits. SCE recommends the following edits: "It is anticipated that these poles would either be reused or disposed of through SCE's Treated Wood Waste contractor, Waste Management, Inc. at El Sobrante Landfill, ~~Savage Canyon Landfill, the only landfill identified by the applicant for the proposed project that can accept treated wood waste (CalRecycle 2016, SCE 2015b)~~ as discussed further in Section 4.12, "Public Services and Utilities.""
4.7.3.3	4.7-33 Lines 13-14	"An HMMP would also be required pursuant to California HSC Section 25503.5."	Rationale: Please strike since there is no longer a Section 25503.5 of the HSC. SCE recommends the following edits: "~~An HMMP would also be required pursuant to California HSC Section 25503.5~~"
4.7.3.3	4.7-33 Lines 22-24	"Mitigation Measure (MM) HZ-1 would require that the applicant prepare a Hazardous Materials Business Plan prior to construction to address hazardous materials that would be stored on site over threshold quantities as part of the proposed project."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE recommends the following edits: ~~"Mitigation Measure (MM) HZ-1 would require that the applicant~~ In compliance with the regulatory requirements described in section 4.7.2.2 SCE will prepare a Hazardous Materials Business Plan prior to construction to address hazardous materials that would be stored on site over threshold quantities as part of the proposed project."
4.7.3.3	4.7-33 Line 29	"MM HZ-3 requires preparation and implementation of an SPCC plan."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE recommends the following edits: "~~MM HZ-3 requires preparation and implementation of an SPCC plan.~~ In compliance with the regulatory requirements described in Section 4.7.2.1 the applicant will prepare and implement a Spill Prevention, Control, and Countermeasure Plan."
4.7.3.3	4.7-33 Lines 29-32	"MM HY-1 requires the applicant to apply to the State Water Resources Control Board (SWRCB) for coverage under the NPDES Construction General Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP) for the SWRCB's review and approval."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. This is consistent with SCE's comments in Hydrology and Water Quality.

Section	Page	DEIR Language	SCE Recommended Language
			SCE recommends the following edits: "~~MM HY-1 requires the applicant to apply to the State Water Resources Control Board (SWRCB) for coverage under the NPDES Construction General Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP) for the SWRCB's review and approval.~~"
4.7.3.3	4.7-33 Lines 35-36	"Impacts would be less than significant with implementation of MM HZ-1, MM HZ-2, MM HZ-3, and MM HY-1."	Rationale: Please update language to include specific plans and measures used to make the significance determination, based on comments above where compliance with existing laws and regulations is required. SCE recommends the following edits: "Impacts would be less than significant with implementation of ~~MM HZ-1, MM HZ-2, MM HZ-3, and MM HY-1~~ an HMBP, SPCC Plan, SWPPP, and MM HZ-2."
4.7.3.3	4.7-34 Line 20	"MM HZ-3 requires preparation and implementation of an SPCC plan."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE recommends the following edits: ~~MM HZ-3 requires preparation~~ In compliance with regulatory requirements SCE will prepare and implement~~ation of~~ an SPCC plan."
4.7.3.3	4.7-34 Lines 30-32	"Therefore, MM HZ-4 would require that the applicant prepare a Contaminated Soil Contingency Plan, which would be implemented if contaminated soils are uncovered during earth-moving activities."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE recommends the following edits: "~~Therefore, MM HZ-4 would require that~~ In compliance with regulatory requirements described in section 4.7.2.2 the applicant will prepare a Contaminated Soil Contingency Plan, which would be implemented if contaminated soils are uncovered during earth-moving activities."
4.7.3.3	4.7-34 Lines 44-46	"MM HY-2 outlines requirements that SCE must follow for disposal of contaminated groundwater. Implementation of MM HY-2 would reduce impacts to less than significant."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE recommends the following edits: "~~MM HY-2~~ The regulatory requirements described in section 4.8.2.2 outline~~s~~ requirements that SCE must follow for disposal of contaminated groundwater. ~~Implementation of MM HY-2 would~~ Compliance with those regulations will reduce impacts to less than significant."
4.7.3.3	4.7-35	"As stated previously, MM HZ-4 would be implemented in the event that contaminated soil is	Rationale:

Section	Page	DEIR Language	SCE Recommended Language
	Lines 31-32	encountered and would reduce impacts to less than significant."	Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE recommends the following edits: "As stated previously, ~~MM HZ-4 would be implemented~~ in the event that contaminated soil is encountered SCE would comply with regulatory requirements and would reduce impacts to less than significant."
4.7.3.3	4.7-37 Lines 11-18	"The applicant would prepare and implement a Soil Management Plan in accordance with MM HZ-4, which would include precautionary measures and methods for handling potentially contaminated soils at all site areas that involve excavation activities. MM HZ-4 further identifies appropriate measures that must be followed in the event of this unanticipated discovery, including soil sampling, collection, and analysis to determine the appropriate disposal and treatment options, as well as cleanup or avoidance, as appropriate. Implementation of MM HZ-4 in the event of a discovery would reduce potential hazards to the public or the environment to less than significant."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE recommends the following edits: "The applicant would prepare and implement a Soil Management Plan in accordance with ~~MM HZ-4~~regulatory requirements, which would include precautionary measures and methods for handling potentially contaminated soils at all site areas that involve excavation activities. ~~MM HZ-4 further identifies appropriate measures that must be followed in the event of this unanticipated discovery, including soil sampling, collection, and analysis to determine the appropriate disposal and treatment options, as well as cleanup or avoidance, as appropriate. Implementation of MM HZ-4 i~~In the event of a discovery, compliance with regulatory requirements would reduce potential hazards to the public or the environment to less than significant."
4.7.4	4.7-39 Lines 3-14	**"MM HZ-1: Hazardous Materials Business Plan.** A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on: • Hazardous materials stored at the Mesa Substation over threshold quantities. • A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points. • Emergency response plans for release and threatened release of the covered materials. The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. In the event that the mitigation measure is not removed, please modify language to reflect SCE's submittal process for HMBPs. SCE recommends the following edits: "~~**MM HZ-1: Hazardous Materials Business Plan.** A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on:~~ ~~• Hazardous materials stored at the Mesa Substation over threshold quantities.~~ ~~• A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points.~~ ~~• Emergency response plans for release and threatened release of the covered materials.~~ ~~The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.~~ or ~~The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.~~ The HMBP must be submitted at least 30 days prior to storage of covered hazardous materials via the California

Section	Page	DEIR Language	SCE Recommended Language
			Environmental Reporting System (CERS). A receipt, showing that the agency received the Plan, must be submitted to the CPUC prior to storage of covered hazardous materials.”
4.7.4	4.7-39 Lines 16-34	**“MM HZ-2: Hazardous Materials Training.** Prior to construction, the applicant will prepare and implement a worker environmental awareness program (WEAP) for CPUC review and approval that includes: • Instruction regarding the location of Material Safety Data Sheets, as well as proper labeling, storage, use, transport, and disposal of hazardous materials. • Information on common contaminants that could be uncovered in the proposed project area and instruction regarding appropriate procedures if potentially contaminated soil is present. • Procedures for spill response under the SPCC (MM HZ-3) including notification to appropriate personnel, including the Spill Response Coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination. • Instruction on individual responsibilities under the Clean Water Act, the project SPCC, the project SWPPP, and site-specific BMPs. • Instruction on compliance with OSHA regulations and procedures if landfill gas is encountered during excavations. The applicant will maintain records documenting attendees at each training.”	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE recommends the following edits: **“MM HZ-2: Hazardous Materials Training**. Prior to construction, the applicant will prepare and implement a worker environmental awareness program (WEAP) for CPUC review and approval that includes: • Instruction regarding the location of Material Safety Data Sheets, as well as proper labeling, storage, use, transport, and disposal of hazardous materials. • Information on common contaminants that could be uncovered in the proposed project area and instruction regarding appropriate procedures if potentially contaminated soil is present. • Procedures for spill response will be in compliance with existing laws and regulations ~~under the SPCC (MM HZ-3)~~ including notification to appropriate personnel, including the Spill Response Coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination. • Instruction on individual responsibilities under the Clean Water Act, the project SPCC, the project SWPPP, and site-specific BMPs. • Instruction on compliance with OSHA regulations and procedures if landfill gas is encountered during excavations. The applicant will maintain records documenting attendees at each training.”
4.7.4	4.7-39 Lines 36-41	**“MM HZ-3: Spill Prevention, Control, and Countermeasure Plan.** SCE shall prepare a site-specific SPCC plan that identifies spill response and prevention measures and BMPs. SCE shall indicate site specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction for review and approval.”	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. In the event that the mitigation measure is not removed, please modify language to reflect SCE’s submittal process for SPCC. SCE recommends the following edits: ~~**“MM HZ-3: Spill Prevention, Control, and Countermeasure Plan.** SCE shall prepare a site-specific SPCC plan that identifies spill response and prevention measures and BMPs. SCE shall indicate site specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction for review and approval.~~” Or

Section	Page	DEIR Language	SCE Recommended Language
			"SCE shall submit the SPCC to CPUC at least 30 days prior to ~~construction~~ delivery of any additional transformer oil to the site ~~for review and approval~~."
HYDROLOGY AND WATER QUALITY			
4.8.1.3	4.8-5 Line 40	"Figure 4.8-3"	Rationale: Please correct typographical error referencing the incorrect figure number. SCE recommends the following edits: "Figure 4.8.~~3~~2"
4.8	4.8-6 Lines 33-41	"The Mesa Substation site is in an inundation area for the Garvey Reservoir if the south dam fails. Flood depths would be 6 to 7 feet. From there, water would come up against State Route 61 and then eventually flow through freeway undercrossings (City of Monterey Park 2001). Staging Yard 5 and structure replacement in the City of Commerce are also in the Garvey Reservoir inundation zone, but farther from the reservoir itself. Floodwaters would reach the City within 15 minutes (City of Commerce 2008). Staging Yard 6 is in the inundation area of the Garvey Reservoir should the north dam fail (City of Rosemead 2010; City of Monterey Park 2001). The average water depth would be about 5 feet (City of Monterey Park 2001). The Garvey Reservoir was repaired in 1999 to fix seepage and to increase the integrity of the reservoir (City of Monterey Park 2001)."	Rationale: SCE has reviewed the City of Monterey Park General Plan (2001) section related to the potential failure of the north and south dams surrounding the MWD Garvey Reservoir, including Figure SCS-4, which clearly shows that the Main Project Area is not within any inundation area. Please modify impact analysis as shown below and eliminate mitigation measure MM HY-6. SCE recommends the following edits: "The Mesa Substation site is not in an inundation area for the Garvey Reservoir if the south dam fails. ~~Flood depths would be 6 to 7 feet. From there, water would come up against State Route 61 and then eventually flow through freeway undercrossings~~ (City of Monterey Park 2001, Figure SCS-4). Staging Yard 5 and structure replacement in the City of Commerce are ~~also~~ in the Garvey Reservoir inundation zone, but farther from the reservoir itself. Floodwaters would reach the City within 15 minutes (City of Commerce 2008). Staging Yard 6 is in the inundation area of the Garvey Reservoir should the north dam fail (City of Rosemead 2010; City of Monterey Park 2001). The average water depth would be about 5 feet (City of Monterey Park 2001). The Garvey Reservoir was repaired in 1999 to fix see page and to increase the integrity of the reservoir (City of Monterey Park 2001)."
4.8.1.3	4.8-6 Lines 6-11	"Under section 303(d) of the Clean Water Act, states identify water bodies as impaired for certain pollutants. The only listed water body in the vicinity of the project area is Legg Lake, which is located 0.2 mile northeast of Staging Area 7 and about .02 mile north of Telecommunications Route 3."	Rationale: Please correct distance and direction of Legg Lake as related to the Proposed Project. SCE recommends the following edits: Under section 303(d) of the Clean Water Act, states identify water bodies as impaired for certain pollutants. The only listed water body in the vicinity of the project area is Legg Lake, which is "located 0.2 mile ~~northeast~~ southwest of Staging Area 7 and about ~~.02~~0.1 mile north of Telecommunications Route 3.
4.8.1.3	4.8-6 Lines	"The Mesa Substation site is in an inundation area for the Garvey Reservoir if the south dam fails. Flood depths would be 6 to 7 feet. From there, water would come up against State Route 61 and…"	Rationale:

Section	Page	DEIR Language	SCE Recommended Language
	33-34		Please correct typographical error to indicate proper State Route number. SCE recommends the following edits: "The Mesa Substation site is in an inundation area for the Garvey Reservoir if the south dam fails. Flood depths would be 6 to 7 feet. From there, water would come up against State Route 6~~1~~0 and…"
4.8.2.1	4.8-12 Lines 6-14	"As authorized by Section 402 of the CWA, the SWRCB administers the statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (NPDES Permit, 2009-0009-DWQ and 2010-0014-DWQ) that covers a variety of construction activities that could result in wastewater discharges. Under this system, the state grants coverage under the Construction General Permit for projects that disturb more than one acre of land. The SWRCB Construction General Permit process involves the notification of the construction activity by providing a Notice of Intent to the SWRCB, the development of a Stormwater Pollution Prevention Plan (SWPPP), and the implementation of water quality monitoring activities if needed. The purpose of a SWPPP is to:"	Rationale: Please update to include permit amendment. SCE recommends the following edits: "As authorized by Section 402 of the CWA, the SWRCB administers the statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (NPDES Permit, 2009-0009-DWQ as amended by ~~and~~ 2010-0014-DWQ and 2012-0006-DWQ) ~~that~~ which covers a variety of construction activities that could result in wastewater discharges. Under this system, the state grants coverage under the Construction General Permit for projects that disturb ~~more than~~ one acre or more of land. The SWRCB Construction General Permit process involves the notification of the construction activity by providing a Notice of Intent to the SWRCB, the development of a Storm W~~w~~ater Pollution Prevention Plan (SWPPP), and the implementation of water quality monitoring activities if needed. The purpose of a SWPPP is to:"
4.8.2.1	4.8-12 Lines 24-29	"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 CWA Section 303(d); and 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."	Rationale: Sampling requirements are dependent upon the risk level, or type of project. This risk level and type are determined by both sediment and receiving water risk. If the risk level, or type, are determined to be a level or type one, sampling will not be required unless a non-storm water discharge occurs and cannot be properly cleaned up prior to a rain event. SCE recommends 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 CWA Section 303(d)~~; and ~~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.~~"
4.8.2.1	4.8-13	Missing Section language.	Rationale: Please include a narrative to include 404 permit.

Section	Page	DEIR Language	SCE Recommended Language
			SCE recommends the following edits: ***Section 404*** Under Section 404, the United States Army Corps of Engineers (USACE) and USEPA regulate the discharge of dredged or fill material into "waters of the United States." Under Section 404, the phrase "waters of the United States" includes wetland and non-wetland aquatic habitats within the jurisdictional extent of rivers and streams defined by the ordinary high water mark. Such discharges may result from navigational dredging, flood control channelization, levee construction, channel clearing, fill of wetlands for development, or other activities. Projects that involve the removal or placement of soil, sediment, and other materials in or near waterbodies require CWA Section 404 permit authorizations from USACE.
4.8.2.2	4.8-13 Lines 28-33	"Article 4 of the Porter-Cologne Water Quality Control Act (California Water Code 13260 et seq.) states that discharge of waste in an area that could affect Waters of the State requires filing a report of discharge with the Regional Water Quality Control Board. Waters of the State include surface water and groundwater in the state. Dischargers must obtain Waste Discharge Requirements (WDRs). If waters are also Waters of the U.S., then the WDR is covered by the section 401Water Quality Certification, previously discussed."	Rationale: Please update language to include Basin Plan. The 401 is discussed in the Federal section and should not be included here. SCE recommends the following edits: "~~Article 4 of the Porter-Cologne Water Quality Control Act (California Water Code 13260 et seq.) states that discharge of waste in an area that could affect Waters of the State requires filing a report of discharge with the Regional Water Quality Control Board. Waters of the State include surface water and groundwater in the state. Dischargers must obtain Waste Discharge Requirements (WDRs). If waters are also Waters of the U.S., then the WDR is covered by the section 401Water Quality Certification, previously discussed.~~ The Porter-Cologne Act (California Water Code, Division 7) Water Code Section 13000 et seq., requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The 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. The proposed project is within the jurisdiction of the Water Quality Control Plan for the Los Angeles Basin Plan for Coastal Watersheds of Los Angeles and Ventura Counties (LARWQCB, 1994). The basin plan is reviewed and updated on a regular basis as needed through amendments."
4.8.2.3	4.8-13	Missing permitting language.	Rationale: Please include a narrative regarding the LA County MS-4 Permit. Project activities may be subject to the local MS-4 Permit issued by the SWRCB. Impacted cities are co-permittees. SCE recommends the following edits:

Section	Page	DEIR Language	SCE Recommended Language
			"**Los Angeles County MS4 Permit** *Municipal Separate Storm Water Sewer System Permit* The Los Angeles RWQCB reissued the MS4 Permit Water Quality Order No. R4-2012-0175, as amended by State Water Board Order WQ 2015-0075 (NPDES No. CAS004001) (Permit) on November 8, 2012 to regulate discharges within the Coastal Watersheds of Los Angeles County and 84 cities within the Los Angeles Flood Control District, with the exception of the City of Long Beach. The Permit's primary goal is to prevent pollutant laden discharges from entering downstream storm water conveyance systems and draining into local receiving and coastal waters. Each Co-Permittee is responsible for implementing its own storm water program. Co-Permittees under this Permit include the cities of Monterey Park, Montebello, and Pasadena. Pursuant to the Permit, these cities require developments, which meet certain criteria thresholds, to develop and implement post-construction Low Impact Development (LID) Best Management Practices (BMPs) to address pollutant discharges. In accordance with these LID BMP requirements and the City of Monterey Park's MS4 Permit, SCE will prepare and implement an LID BMP plan, where applicable, addressing post-construction requirements."
4.8.3.3	4.8-19 Lines 8-12	"The Monterey Park Department of Public Works Water Utility Division would supply water for construction of the proposed project. An estimated 279 acre-feet of water would be used throughout the 55-month duration of construction. This analysis conservatively assumes that up to half of the estimated construction water, or up to 140 acre-feet per year (AFY), may be used in the first year of construction when the majority of grading activities would occur."	Rationale: SCE revised the water usage calculations in April 2016. Due to an increase in the fill compaction needs and schedule refinement the total usage has increased. Discussions with the Monterey Park Department of Public Works Water Utility Division on the need for water have identified Central Basin Metropolitan Water District as a source for recycled water. Monterey Park has taken the initiative to provide the water to SCE for their project, as well as for the construction of the Monterey Park Market Place project. SCE recommends the following edits: "The Monterey Park Department of Public Works Water Utility Division would supply water for construction of the proposed project. In addition, Monterey Park Department of Public Works Water Utility Division and Central Basin Metropolitan Water District will be able to provide recycled water to alleviate usage of groundwater. An estimated ~~279~~ 404 acre-feet of water would be used throughout the 55-month duration of construction. This analysis conservatively assumes that up to half of the estimated construction water, or up to 140 acre-feet per year (AFY), may be used in the first two years and the last year of construction when the majority of grading activities would occur."
4.8	4.8-20 Lines 43-46	Line 43: "construct a retention basin…" Line 46: "…runoff to the retention basin."	Rationale: Correct typographical error referring a "detention" basin as a "retention" basin, which are different from each other. SCE recommends the following edits: Line 43: "construct a detention ~~retention~~ basin…" Line 46: "…runoff to the detention ~~retention~~ basin."
4.8	4.8-20 Lines	"Increases in runoff water could cause significant erosion during Phase 1, prior to construction of	Rationale:

Section	Page	DEIR Language	SCE Recommended Language
	31-32	the detention basin.”	Please eliminate this language per the current construction plan. The detention basin is expected to be constructed during Phase 1. SCE recommends the following edits: “~~Increases in runoff water could cause significant erosion during Phase 1, prior to construction of the detention basin.~~”
4.8	4.8-20 Line 30	“Phase 2”	Rationale: Please correct this language per the current construction plan. The detention basin is expected to be constructed during Phase 1. SCE recommends the following edits: “Phase ~~2~~ 1”
4.8	4.8-22 Line 15	“Phase 2”	Rationale: Please correct this language per the current construction plan. The detention basin is expected to be constructed during Phase 1. SCE recommends the following edits: “Phase ~~2~~ 1”
4.8	4.8-22 Lines 28-16-17	“Increases in runoff water could cause significant erosion during Phase 1, prior to construction of the detention basin.”	Rationale: Please eliminate this language per the current construction plan. The detention basin is expected to be constructed during Phase 1. SCE recommends the following edits: “~~Increases in runoff water could cause significant erosion during Phase 1, prior to construction of the detention basin.~~”
4.8	4.8-22 Lines 28-31	Line 28: “construct a retention basin…” Line 31: “…runoff to the retention basin.”	Rationale: Correct typographical error referring a “detention” basin as a “retention” basin, which are different from each other. SCE recommends the following edits: Line 28: “construct a detention ~~retention~~ basin…” Line 31: “…runoff to the detention ~~retention~~ basin.”

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
4.8	4.8-24 Line 12	"Phase 2"	Rationale: Please correct this language per the current construction plan. The detention basin is expected to be constructed during Phase 1. SCE recommends the following edits: "Phase ~~2~~ 1"
4.8	4.8-24, Lines 13-14	"Increases in runoff water could cause significant erosion during Phase 1, prior to construction of the detention basin."	Rationale: Please eliminate this language per the current construction plan. The detention basin is expected to be constructed during Phase 1. SCE recommends the following edits: "~~Increases in runoff water could cause significant erosion during Phase 1, prior to construction of the detention basin.~~"
4.8	4.8-24 Lines 22-25	Line 22: "construct a retention basin…" Line 25: "…runoff to the retention basin."	Rationale: Correct typographical error referring a "detention" basin as a "retention" basin, which are different from each other. SCE recommends the following edits: Line 22: "construct a detention ~~retention~~ basin…" Line 25: "…runoff to the detention ~~retention~~ basin."
4.8.3.3	4.8-26 Lines 3-19	"Impact HY-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. LESS THAN SIGNIFICANT WITH MITIGATION Construction Main Project Area The Mesa Substation site, transmission lines, subtransmission lines, nearby telecommunications lines, and Staging Yards 1, 2 and 3 would be located within the inundation area of the Garvey Reservoir should the south dam fail. A failure of the Garvey Reservoir south dam is unlikely during construction. Although the proposed project would not exacerbate the existing flood conditions, a dam failure when workers are present, however, could result in significant impacts due to the close proximity of the dam. MM HY-5 would be implemented to require training on an evacuation route in the event of a dam failure. Impacts would be less than significant after mitigation."	Rationale: Please modify impact HY-8. This is based on SCE's review of the City of Monterey Park General Plan (2001) section related to the potential failure of the north and south dams surrounding the MWD Garvey Reservoir. This is depicted in Figure SCS-4, which shows that the Main Project Area is not within any inundation area. As a result, all impact analysis should be modified as shown below and resultant mitigation measure MM HY-6 should be eliminated. SCE recommends the following edits: "Impact HY-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. LESS THAN SIGNIFICANT ~~WITH MITIGATION~~ Construction Main Project Area The Mesa Substation site, transmission lines, subtransmission lines, nearby telecommunications lines, and Staging

Section	Page	DEIR Language	SCE Recommended Language
			Yards 1, 2 and 3 would not be located within the inundation area of the Garvey Reservoir should the south dam fail. ~~A~~ Also, a failure of the Garvey Reservoir south dam is unlikely during construction and~~. Although~~ the proposed project would not exacerbate the existing flood conditions~~,. a dam failure when workers are present, however, could result in significant impacts due to the close proximity of the dam. MM HY-5 would be implemented to require training on an evacuation route in the event of a dam failure.~~ Impacts would be less than significant ~~after mitigation~~."
4.8.3.3	4.8-27 Lines 16-33	"Operation and Maintenance Main Project Area The Mesa Substation and nearby telecommunications, transmission, subtransmission, and distribution infrastructure would be located in the inundation area of the Garvey Reservoir. The total number of telecommunications, transmission, subtransmission, and distribution structures in the inundation zone would be reduced as a result of the proposed project. Thus, there would be no adverse impact related to structures in a dam inundation area with regards to transmission, subtransmission, and distribution structures. A dam failure is a very low probability event, given that repairs were conducted in 1999, and the proposed project would not exacerbate the existing conditions. However, impacts to the substation in the event of a dam failure could be catastrophic, including potentially widespread outages and severe damage to substation equipment. This would be a significant impact. MM HY-6 would be implemented."	Rationale: Please modify language. This is based on SCE's review of the City of Monterey Park General Plan (2001) section related to the potential failure of the north and south dams surrounding the MWD Garvey Reservoir. This is depicted in Figure SCS-4, which shows that the Main Project Area is not within any inundation area. SCE recommends the following edits: "Operation and Maintenance Main Project Area The Mesa Substation and nearby telecommunications, transmission, subtransmission, and distribution infrastructure would not be located in the inundation area of the Garvey Reservoir. ~~The total number of telecommunications, transmission, subtransmission, and distribution structures in the inundation zone would be reduced as a result of the proposed project. Thus, there would be no adverse impact related to structures in a dam inundation area with regards to transmission, subtransmission, and distribution structures.~~ A dam failure is a very low probability event, given that repairs were conducted in 1999, and the proposed project would not exacerbate the existing conditions. Impacts would be less than significant. ~~However, impacts to the substation in the event of a dam failure could be catastrophic, including potentially widespread outages and severe damage to substation equipment. This would be a significant impact. MM HY-6 would be implemented.~~"
4.8.4	4.8-28 and 4.8-29 Lines 21-48 And 1-13	**"MM HY-1: Stormwater Pollution Prevention Plan.** The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB 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) will be used in all ground disturbance areas. • During construction activities, measures would be in place to ensure that contaminants are not discharged from construction sites. The SWPPP would define areas where hazardous materials and trash would be stored; where vehicles would be parked, fueled and serviced; and where construction materials would be stored. • Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, 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, and to preserve roadways and adjacent	Rationale: Compliance with the Clean Water Act, including SWRCB-issued Construction General Permits is required. Therefore, a mitigation measure is not required. SCE recommends the following edits: "~~**MM HY-1: Stormwater Pollution Prevention Plan.** The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB 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) will be used in all ground disturbance areas.~~

Section	Page	DEIR Language	SCE Recommended Language
		properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities. • Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, 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 would be cleaned up immediately and contaminated soils removed to approved disposal areas. • Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system • Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction.”	~~• During construction activities, measures would be in place to ensure that contaminants are not discharged from construction sites. The SWPPP would define areas where hazardous materials and trash would be stored; where vehicles would be parked, fueled and serviced; and where construction materials would be stored.~~ ~~• Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, 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, and to preserve roadways and adjacent properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities.~~ ~~• Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, 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 would be cleaned up immediately and contaminated soils removed to approved disposal areas.~~ ~~• Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system~~ ~~• Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems.~~ ~~Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction.~~”
4.8.4	4.8-28 and 4.8-29 Lines 35-48 and 1-13	“• Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, 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, and to preserve roadways and adjacent properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities. • Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, 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 would be cleaned up immediately and contaminated soils removed to approved disposal areas. • Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and	Rationale: In the event that the MM HY-1 is not removed as requested. Please modify the language as follows. SCE recommends the following edits: “• Runoff, sedimentation, and erosion control measures would be implemented in compliance with the Storm Water Pollution Prevention Plan (SWPPP) which contains the Best Management Practices (BMPS) that would be implemented to prevent and control sedimentation and erosion during construction and to protect storm water runoff. The SWPPP will be site-specific and prepared in compliance with the Construction General Permit. ~~would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, 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, and to preserve roadways and adjacent properties.~~ BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities.

Section	Page	DEIR Language	SCE Recommended Language
		cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system • Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction."	• Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, these maintenance activities shall be performed at least ~~150 feet~~ 50 feet, if feasible, 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 would be cleaned up immediately and contaminated soils removed to approved disposal areas. • Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system • Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. Verification of Construction General Permit coverage obtained from the State Water Resources Control Board (SWRCB) ~~approval and the approved SWPPP(s)~~ will be provided to the California Public Utilities Commission (CPUC~~) at least 30 days~~ prior to start of construction. The SWPPP will be kept onsite and will be made available upon ~~Updated SWPPPs will be provided to the CPUC on~~ request during construction."
4.8.4	4.8-29 Lines 39-40	"SCE shall submit the plan to Monterey Park and CPUC for review and approval prior to beginning construction activities at the substation site."	Rationale: An "Erosion Control Plan" is required to be submitted to the City for their review and approval as part of the overall Grading Permit process. Also, construction drainage issues are managed through the SWPPP process, which also requires SWRCB approvals. As a result, SCE will ensure that the CPUC will receive copies of approved plans. The Drainage Plan is reviewed/approved by the city as part of grading design review process. Please remove CPUC as a reviewing entity. SCE recommends the following edits: "SCE shall submit the plan to Monterey Park ~~and CPUC~~ for review and approval prior to beginning construction activities at the substation site. SCE will provide a copy of the grading permit to the CPUC."
4.8.4	4.8-29 Lines 42-47	"SCE shall design the detention basin on the proposed Mesa Substation site in accordance with the Los Angeles County Department of Public Works Hydrology Manual (LACDPW2006). The Hydrology Manual contains techniques to calculate runoff flow rates and volumes based on Los Angeles County's historic precipitation and runoff. As applicable, the detention basin shall be designed in accordance with the Los Angeles County Department of Public Works Low Impact Development Standards Manual (LACDPW2014)."	Rationale: Please update text to reflect the correct agency oversight. SCE recommends the following edits: "SCE shall design the detention basin on the proposed Mesa Substation site in accordance with the City of Monterey Park requirements ~~Los Angeles County Department of Public Works Hydrology Manual~~

Section	Page	DEIR Language	SCE Recommended Language
			~~(LACDPW2006)~~. The Hydrology Manual contains techniques to calculate runoff flow rates and volumes based on Los Angeles County's historic precipitation and runoff. As applicable, the detention basin shall be designed in accordance with the City of Monterey Park requirements. ~~Los Angeles County Department of Public Works Low Impact Development Standards Manual (LACDPW2014).~~"
4.8.4	4.8-30 Lines 7-14	"**MM HY-6: Dam Inundation Substation Protection.** SCE shall incorporate dam inundation measures into its substation at the design phase to reduce the potential for widespread outages and equipment damages in the event of failure of the south dam at Garvey Reservoir. Measures could include: • Concrete perimeter wall and flood gates at entry ways; • Elevation of key substation equipment above inundation levels; or • Sealing of equipment buildings."	Rationale: Please eliminate MM HY-6. This is based on SCE's review of the City of Monterey Park General Plan (2001) section related to the potential failure of the north and south dams surrounding the MWD Garvey Reservoir. This is depicted in Figure SCS-4, which shows that the Main Project Area is not within any inundation area. MWD has concurred with SCE's analysis. SCE recommends the following edits: "~~**MM HY-6: Dam Inundation Substation Protection.** SCE shall incorporate dam inundation measures into its substation at the design phase to reduce the potential for widespread outages and equipment damages in the event of failure of the south dam at Garvey Reservoir. Measures could include:~~ ~~• Concrete perimeter wall and flood gates at entry ways;~~ ~~• Elevation of key substation equipment above inundation levels; or~~ ~~• Sealing of equipment buildings.~~"
NOISE			
4.10.3.3	4.10-21 Lines 22-25 and Line 41	Lines 22-25 "There are residences within 500 feet of the construction area for structure replacement and telecommunications routing. Staging Yard 4 is also located within 500 feet of a residential area and may be used for helicopter landing and takeoff." Line 41 "Helicopter use at Staging Yard 4 would produce noise levels of up to 97 dBA at 100 feet. Construction-related noise associated with the proposed project would exceed the noise limits set forth in the City of Pasadena's noise ordinance as a result of construction occurring outside of the allowed construction hours and as a result of helicopter landing activities at Staging Yard 4. This would be a significant impact. Noise reduction mitigation measures would not be effective at reducing helicopter noise within 100 feet, since the helicopters would produce noise when airborne and landing, where noise barriers would be ineffective. Impacts would be significant and unavoidable."	Rationale: Helicopter use was not called out in the PEA for conductor installation at Goodrich substation, and is still not expected as of the date of this submittal. SCE recommends the following edits: Lines 22-25 "There are residences within 500 feet of the construction area for structure replacement and telecommunications routing. Staging Yard 4 is also located within 500 feet of a residential area ~~and may be used for helicopter landing and takeoff.~~" Line 41-48 "~~Helicopter use at Staging Yard 4 would produce noise levels of up to 97 dBA at 100 feet. Construction-related noise associated with the proposed project would exceed the noise limits set forth in the City of Pasadena's noise ordinance as a result of construction occurring outside of the allowed construction hours and as a result of helicopter landing activities at Staging Yard 4. This would be a significant impact. Noise reduction mitigation~~

<table>
<tr><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td></td><td></td><td></td><td><s>measures would not be effective at reducing helicopter noise within 100 feet, since the helicopters would produce noise when airborne and landing, where noise barriers would be ineffective. Impacts would be significant and unavoidable.</s>”</td></tr>
<tr><td>4.10.3.3</td><td>4.10-28 Line 12</td><td>“Helicopters would take off and land at Staging Yards 1 through 4.”</td><td>Rationale:
Please update language to reflect the yards that could potentially be used for helicopter operations.

SCE recommends the following edits:

“Helicopters would <u>potentially</u> take off and land at Staging Yards 1 through <u>3</u>4.”</td></tr>
<tr><td>Table 4.10-19</td><td>4.10-28</td><td>Table 4.10-19 Helicopter Takeoff and Landing Impacts<table><tr><th>Staging Yard</th><th>Closest Sensitive Receptor[1]</th><th>Estimated Existing Noise Level at Closest Receptor</th><th>Helicopter Takeoff and Landing Impact (dBA)</th><th>Increase in dBA</th><th>Threshold (Increase in dBA)</th><th>Significant?</th></tr><tr><td>1</td><td>550 feet (homes on Holly Oak Drive)</td><td>52[2]</td><td>82</td><td>30</td><td>10</td><td>Yes</td></tr><tr><td>2</td><td>300 feet (homes on North Vail Avenue)</td><td>62[3]</td><td>87</td><td>25</td><td>10</td><td>Yes</td></tr><tr><td>3</td><td>840 feet (apartments on Neil Armstrong Street)</td><td>55[4]</td><td>79</td><td>24</td><td>10</td><td>Yes</td></tr><tr><td>4</td><td>170 feet (residences on Eaton Drive)</td><td>60[5]</td><td>92</td><td>32</td><td>10</td><td>Yes</td></tr></table></td><td>Rationale:
Please modify table by deleting the last row since this yard will not have helicopter operations.

SCE recommends the following edits:Table 4.10-19 Helicopter Takeoff and Landing Impacts<table><tr><th>Staging Yard</th><th>Closest Sensitive Receptor[1]</th><th>Estimated Existing Noise Level at Closest Receptor</th><th>Helicopter Takeoff and Landing Impact (dBA)</th><th>Increase in dBA</th><th>Threshold (Increase in dBA)</th><th>Significant?</th></tr><tr><td>1</td><td>550 feet (homes on Holly Oak Drive)</td><td>52[2]</td><td>82</td><td>30</td><td>10</td><td>Yes</td></tr><tr><td>2</td><td>300 feet (homes on North Vail Avenue)</td><td>62[3]</td><td>87</td><td>25</td><td>10</td><td>Yes</td></tr><tr><td>3</td><td>840 feet (apartments on Neil Armstrong Street)</td><td>55[4]</td><td>79</td><td>24</td><td>10</td><td>Yes</td></tr><tr><td><s>4</s></td><td><s>170 feet (residences on Eaton Drive)</s></td><td><s>60[5]</s></td><td><s>92</s></td><td><s>32</s></td><td><s>10</s></td><td><s>Yes</s></td></tr></table></td></tr>
<tr><td>4.10.4</td><td>4.10-31 and 4.10-32 Lines 27-46 and 1-31</td><td>“MM NV-1: Noise Control Plan. Prior to the start of construction, the applicant shall prepare a Noise Control Plan to ensure that project construction noise does not:
• Increase ambient noise levels by more than 10 dBA (8-hour L_{eq}), or
• Exceed the noise level specified in the applicable jurisdiction’s noise ordinance.

The Noise Control Plan measures shall be selected based on equipment used and activity conducted in specific locations, once known. The applicant shall submit the Noise Control Plan to the CPUC at</td><td>Rationale:
The first bullet standard (reduction of noise levels by 10 dB) applies to operations and is not applicable to construction noise. SCE recommends striking the second bullet standard (instituting measures to meet the jurisdiction’s noise standards) because it is not achievable. SCE has provided references to “noise reduction” instead in the recommended edits below. The DEIR analysis states that even with the implementation of MM NS-1, the impact at several locations will be significant and unavoidable, and noise will exceed some local jurisdictions’ standards. SCE recommends making the list of measures to be included in the plan less prescriptive. Please revise to allow SCE the flexibility to implement measures that will help reduce noise impacts, given specific equipment</td></tr>
</table>

Section	Page	DEIR Language	SCE Recommended Language
		least 30 days prior to the start of construction for review and approval. The Noise Control Plan shall include, but not be limited to, the following noise reduction and control measures: • Temporarily install and maintain an absorptive noise control barrier in the perimeter of construction sites located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers and ensure such barriers are installed in a safely manner. • Limit heavy equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity. • Ensure that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition. • Maintain construction equipment according to manufacturer recommendations. • Minimize construction equipment idling. • Reduce noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimizes the need for back-up alarms and use flagmen to minimize the time needed to back up vehicles. • When possible, use 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. • Where practical, locate stationary equipment such as compressors, generators, and welding machines away from sensitive receptors or behind barriers. The Noise Control Plan shall detail the frequency, location, and methodology for noise monitoring prior to and during various construction and restoration activities to ensure that generated noise levels do not exceed 10 dBA above existing ambient noise levels, or the applicable jurisdiction noise standards. The Noise Control Plan shall detail the actions and procedures that the applicant shall implement to mitigate impacts in the event that monitoring detects noise levels that have exceeded the criteria specified in this EIR. Noise level measurements shall be conducted in compliance with the City of Monterrey Park, City of Montebello, City of Commerce, City of Bell Gardens, City of Pasadena, and Los Angeles County requirements. The Noise Control Plan shall designate a Construction Relations Officer who is readily available to answer questions or respond to complaints during any hours or days that construction or restoration is occurring. The applicant shall send pre-construction notifications to sensitive receptors located within 100 feet of construction activities at least 30 days prior construction. The notification shall include a phone number for the public to contact the Construction Relations Officer. Additionally, each construction site shall include clearly visible signs with the Construction Relations Officer's public phone number. The applicant shall submit monthly reports to the CPUC summarizing the complaints submitted to the Construction Relations Officer. The summary reports shall describe how each complaint was addressed, if and when it was resolved, and contact information for the	type, hours of use, and location, etc. Monitoring at specific sensitive receptor locations is replaced with modeling at the source of the noise to provide SCE with greater flexibility for implementing the measures. SCE recommends the following edits: **"MM NV-1: Noise Control Plan.** Prior to the start of construction, the applicant shall prepare a Noise Control Plan to ~~ensure that~~ reduce project construction noise. ~~does not:~~ ~~• Increase ambient noise levels by more than 10 dBA (8-hour Leq), or~~ ~~• Exceed the noise level specified in the applicable jurisdiction's noise ordinance.~~ The Noise Control Plan measures ~~shall~~ will be selected based on the specific equipment used ~~and~~, activity conducted, and proximity to sensitive noise receptors ~~once known~~. The applicant shall submit the Noise Control Plan to the CPUC at least 30 days prior to the start of construction for review and approval. The Noise Control Plan will ~~shall include, but not be limited to,~~ consider the following noise reduction and control measures: • Temporarily and safely install and maintain an absorptive noise control barriers placed between stationary construction equipment and sensitive noise receptors. ~~in the perimeter of construction sites located within 200 feet of noise- intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers and ensure such barriers are installed in a safely manner.~~ • Limit ~~heavy~~ heavy-equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity. • Efforts will be made to ~~E~~ensure that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition. • ~~Maintain~~ Efforts will be made to maintain construction equipment according to manufacturer recommendations. • Minimize construction equipment idling to the extent feasible. ~~• Reduce noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimizes the need for back-up alarms and use flagmen to minimize the time needed to back up vehicles.~~ • When possible, use construction equipment specifically designed for low noise emissions (~~i.e.~~ e.g.~~, 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.~~ • Where practical, locate stationary equipment such as compressors, generators, and welding machines away from sensitive receptors ~~or behind barriers~~. The Noise Control Plan ~~shall~~ will detail the frequency, location, and methodology for noise monitoring prior to and during various construction and restoration activities to ~~ensure that~~ reduce generated noise levels ~~do not exceed 10 dBA above existing ambient noise levels, or the applicable jurisdiction noise standards.~~ These methods shall include monitoring noise levels at the boundary of construction areas and using industry-standard computer noise modeling techniques to predict noise levels at adjacent sensitive noise receptors. Should the modeled levels exceed the standards in the applicable jurisdiction's noise standards, noise monitoring near the sensitive receptors shall be conducted to verify the modeling results. The Noise Control Plan shall detail the actions and procedures that the

Section	Page	DEIR Language	SCE Recommended Language
		member of the public who submitted the complaint."	applicant shall implement to mitigate impacts in the event that monitoring detects noise levels that have exceeded the criteria specified in this EIR. Noise level measurements shall be conducted in compliance with ~~the~~ ~~City of Monterrey Park, City of Montebello, City of Commerce, City of Bell Gardens, City of Pasadena, and Los Angeles County requirements~~ local agency requirements, if available. The Noise Control Plan ~~shall~~ will designate a Construction Relations Officer who is readily available to answer questions or respond to complaints during active ~~any hours or days that~~ construction or restoration periods ~~is occurring~~. The applicant shall send pre-construction notifications to sensitive receptors located within 100 feet of construction activities at least 30 days prior construction. The notification shall include a phone number for the public to contact the Construction Relations Officer. Additionally, each construction site shall include clearly visible signs with the Construction Relations Officer's public phone number. The applicant shall submit monthly reports to the CPUC summarizing the complaints submitted to the Construction Relations Officer. The summary reports shall describe how each complaint was addressed, if and when it was resolved, and the contact information for the member of the public who submitted the complaint, if available."
4.10	4.10-32 Lines 33-41	**"MM NV-2: Compliance with Monterey Park Ordinance.** As soon as Mesa Substation is fully operational, the applicant shall conduct noise measurements to ensure that the operational noise levels from the substation transformers do not exceed the City of Monterey Park's 50-dBA nighttime noise standard at the closest receptor. If the threshold is exceeded, the applicant shall implement engineering solutions, including, but not limited to, barrier walls around the transformer, sound absorbing panels, and/or noise cancellation methods until the project does not exceed the threshold. SCE must submit the noise measurements in the form of a memorandum to the CPUC within two weeks of measurement. Reports shall be submitted until the CPUC verifies that operation noise does not exceed the City of Monterey Parks' 50-dBA nighttime threshold."	Rationale: SCE recommends striking this mitigation measure. It is infeasible to institute measures to meet the jurisdiction's noise standards because the ambient noise level is 52dBA. To the extent feasible, SCE has implemented noise reduction measures in its design. SCE recommends the following edits: "~~**MM NV-2: Compliance with Monterey Park Ordinance.** As soon as Mesa Substation is fully operational, the applicant shall conduct noise measurements to ensure that the operational noise levels from the substation transformers do not exceed the City of Monterey Park's 50-dBA nighttime noise standard at the closest receptor. If the threshold is exceeded, the applicant shall implement engineering solutions, including, but not limited to, barrier walls around the transformer, sound absorbing panels, and/or noise cancellation methods until the project does not exceed the threshold. SCE must submit the noise measurements in the form of a memorandum to the CPUC within two weeks of measurement. Reports shall be submitted until the CPUC verifies that operation noise does not exceed the City of Monterey Parks' 50-dBA nighttime threshold.~~"
4.10.4	4.10-33 Lines 5-9	**"MM NV-4: Positioning of Helicopter Landing and Takeoff Areas.** SCE shall position helicopter landing and takeoff areas in Staging Yards 1, 2, 3, and 4 as far away as feasible from sensitive receptors, while not sacrificing the safety of helicopter operations due to hazards (e.g., transmission lines) in and around the staging yards."	Rationale: Please update language to reflect the yards that could potentially be used for helicopter operations. SCE recommends the following edits: **"MM NV-4: Positioning of Helicopter Landing and Takeoff Areas.** SCE shall position helicopter landing and takeoff areas in Staging Yards 1, 2, and 3, ~~and 4~~ as far away as feasible from sensitive receptors, while not sacrificing the safety of helicopter operations due to hazards (e.g., transmission lines) in and around the staging yards."

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

<table>
<tr><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommended Language</th></tr>
<tr><td colspan="4">PUBLIC SERVICES</td></tr>
<tr><td>4.12.1.2</td><td>4.12-5
Lines
25-34</td><td>“The proposed project would generate solid waste during construction (e.g., concrete, nonrecyclable metals, green waste, refuse, spoils, trash, and wood poles). SCE would use three <u>four</u> approved, licensed landfills in the vicinity of the proposed project for the solid waste materials: Savage Canyon Landfill in Whittier, Azuza Land Reclamation Landfill in Azuza<u>,</u> and Scholl Canyon Landfill in Los Angeles. These landfills are rated as Class III landfills, which accept clean dirt, concrete, and asphalt (CalRecycle 2015a, b, c). Additionally, Asuza landfill can accept asbestos and Non-hazardous petroleum contaminated soil (CalRecycle 2015a). Savage Canyon <u>El Sobrante</u> Landfill can also accept treated wood waste (CalRecycle 2015b). Disposal of hazardous materials is discussed in Section 4.7, “Hazards and Hazardous Materials.” Characteristics of the three landfills that would serve the proposed project are shown in Table 4.12-3.”</td><td>Rationale:

SCE disposes of wood poles through Waste Management Inc. and the contract limits locations where the wood poles can be disposed. Savage Canyon is not a facility utilized by SCE for wood poles and any additional locations must be approved through a contract Change Order. Additionally, Savage Canyon only accepts waste from within the Whittier city limits.

SCE recommends the following edits:

“The proposed project would generate solid waste during construction (e.g., concrete, nonrecyclable metals, green waste, refuse, spoils, trash, and wood poles). SCE would use ~~three~~ <u>four</u> approved, licensed landfills in the vicinity of the proposed project for the solid waste materials: Savage Canyon Landfill in Whittier, ~~Azuza~~ <u>Azusa</u> Land Reclamation Landfill in ~~Azuza~~ <u>Azusa,</u> ~~and~~ Scholl Canyon Landfill in Los Angeles, <u>and El Sobrante Landfill in Corona</u>. These landfills are rated as Class III landfills, which accept clean dirt, concrete, and asphalt (CalRecycle 2015a, b, c). Additionally, ~~Asuza~~ <u>Azusa</u> landfill can accept asbestos and Non-hazardous petroleum contaminated soil (CalRecycle 2015a). ~~Savage Canyon~~ <u>El Sobrante</u> Landfill can also accept treated wood waste (CalRecycle 2015b). Disposal of hazardous materials is discussed in Section 4.7, “Hazards and Hazardous Materials.” Characteristics of the ~~three~~ <u>four</u> landfills that would serve the proposed project are shown in Table 4.12-3.”</td></tr>
<tr><td>4.12.1.2</td><td>4.12-5</td><td>Table 4.12-3</td><td>Rationale:

SCE recommends adding an additional row to the table to include El Sobrante. El Sobrante is the wood pole landfill used for the project area and this information fits the data provided in table 4.12-3. Data from CalRecycle.

SCE recommends the following edits:

Landfill | Distance | Closure Date | Waste Permitted | Remaining Waste Capacity
<u>El Sobrante Landfill</u> | <u>40</u> | <u>2045</u> | <u>184,930,000</u> | <u>145,530,000</u></td></tr>
<tr><td>4.12.3.3</td><td>4.12-14
Lines
23-28</td><td>“However, MM HY-1 (see Section 4.8, “Hydrology and Water Quality”) would require that SCE develop a Storm Water Pollution Prevention Plan (SWPPP), which would include design features to control runoff rates, direct water to the direction of natural drainage, and incorporate SWPPP best management practices to minimize erosion that could cause sedimentation and loss of receiving water capacity during construction.”</td><td>Rationale:

Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. This is consistent with SCE’s comments in Hydrology and Water Quality.

SCE recommends the following edits:

“However, ~~MM HY-1 (see Section 4.8, “Hydrology and Water Quality”) would require that~~ SCE <u>will</u> develop a Storm Water Pollution Prevention Plan (SWPPP), which would include design features to control runoff rates, direct water to the direction of natural drainage, and incorporate SWPPP best management practices to minimize erosion that could cause sedimentation and loss of receiving water capacity during construction.”</td></tr>
</table>

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
4.12.3.3	4.12-14 Line 20	"(i.e., west of the proposed substation site area)"	Rationale: Please correct typographical error, as the general upstream areas are east of the station, not west. Consistent with lines 9-10 describing existing drainage patterns. SCE recommends the following edits: "(i.e., ~~west~~ east of the proposed substation site area)"
4.12.3.3	4.12-15 Lines 25-27	"To conservatively assess impacts, it is assumed that up to half of the estimated construction water, or 140 AF, may be used in the first year of construction, when the majority of grading activities would occur, and less in subsequent years."	Rationale: Please update the Impact PSU-5 analysis to reflect updated water usage number to be consistent with Hydrology and Water quality (page 4.8-19). SCE recommends the following edits: "To conservatively assess impacts, it is assumed that up to half of the estimated construction water, or 140 AF, may be used in the first two years and the last year of construction, when the majority of grading activities would occur, and less in subsequent years."
4.12.3.3	4.12-16 and 4.12-17 Lines 47 and Lines 1-6	Under Impact PSU-7 on referenced page, line 47: "The remaining solid waste that cannot be recycled would be classified and transported to Savage Canyon Landfill, Azuza Land Reclamation Landfill, or Scholl Canyon Landfill in accordance with all applicable federal, state, and local regulations for solid and hazardous waste disposal. These three landfills have a combined remaining capacity of approximately 53.5 million cubic yards (CY) (CalRecycle 2015a, b, c) as shown in Table 4.12-3."	Rationale: As previously discussed, El Sobrante Landfill needs to be added as a wood pole disposal facility. The added remaining capacity of El Sobrante (145 mil CY) makes the new combined remaining capacity approximately 199 mil CY. SCE recommends the following edits: "The remaining solid waste that cannot be recycled would be classified and transported to Savage Canyon Landfill, El Sobrante Landfill, ~~Azuza~~ Azusa Land Reclamation Landfill, or Scholl Canyon Landfill in accordance with all applicable federal, state, and local regulations for solid and hazardous waste disposal. These ~~three~~ four landfills have a combined remaining capacity of approximately ~~53.5~~ 199 million cubic yards (CY) (CalRecycle 2015a, b, c) as shown in Table 4.12-3."
4.12.4	4.12-18 Line 41	"Municipal Water District"	Rationale: The Metropolitan Water District is incorrectly referred to as the "Municipal" Water District, when it is not a municipal water district as defined under state law. This same error is made in the DEIR Public Services and Utilities (PS&U) analysis section. SCE recommends the following edits: "~~Municipal~~ Metropolitan Water District"

Section	Page	DEIR Language	SCE Recommended Language
RECREATION			
4.13.3.3	4.13-5 Lines 31-41	"During peak construction periods, the applicant estimates that up to approximately 435 employees could be working simultaneously on various components throughout the proposed project area. This number conservatively assumes that peak construction of the proposed Mesa Substation; transmission, subtransmission, and distribution relocations; and telecommunications work may all occur simultaneously...However, in the event that local construction crews or contractors are not available, and the applicant were to hire up to 435 non-local employees for the entire duration of construction, the temporary relocation of workers to the project area for approximately 55 months could result in a minor increase in the use of existing neighborhood and regional parks or other recreational facilities."	Rationale: Please update estimates of workers and durations to accurately reflect current estimates. As written, this analysis overstates the number of workers associated with the project and the duration for which they could be working. SCE recommends the following edits: "During peak construction periods, the applicant estimates that up to approximately 435 employees could be working simultaneously on various components throughout the proposed project area. This number conservatively assumes that peak construction of the proposed Mesa Substation; transmission, subtransmission, and distribution relocations; and telecommunications work may all occur simultaneously. The average number of workers is estimated to be approximately 126. However, in the event that local construction crews or contractors are not available, and the applicant were to hire up to 435 non-local employees ~~for the entire duration~~ during peak periods of construction, or an average of approximately 126 workers for the duration of the project, the temporary relocation of workers to the project area ~~for approximately 55 months~~ could result in a minor increase in the use of existing neighborhood and regional parks or other recreational facilities."
TRAFFIC			
4.14,	4.14-1 Lines 26-28	"There would be no impact to SR 164; therefore, the Metro Eastside Transit Corridor Project is not discussed further in this analysis."	Rationale: Please modify to reflect the correct state route for the analysis. SCE recommends the following edits: "There would be no impact to SR 164; therefore, ~~the~~ SR 164~~Metro Eastside Transit Corridor Project~~ is not discussed further in this analysis."
4.14.1.2	4.14-2 Lines 3-4	"Local roadways in the vicinity of the proposed project area are listed in Table 4.14-1. Table 4.14-1 4 also lists the intersections that would be impacted by project-related traffic." "Table 4.14-1 Local Roadways Impacted by Project-Related Traffic"	Rationale: This section and table reference the roadways and intersections to be utilized by the proposed project. This section is not an impact analysis. The term "impacted" infers a reduction in capacity or level of service. SCE suggests renaming the table as well. SCE recommends the following edits: "Local roadways in the vicinity of the proposed project area are listed in Table 4.14-1. Table 4.14-1 4 also lists the intersections that would be ~~impacted~~ utilized by project-related traffic." "Table 4.14-1 Local Roadways ~~Impacted~~ Utilized by Project-Related Traffic"

Section	Page	DEIR Language	SCE Recommended Language
Table 4.14-6	4.14-9	Footnote: "(1) LOS goals are contained in Table 4.14-7."	Rationale: Wrong table referenced. SCE recommends the following edits: "(1) LOS goals are contained in Table 4.14-~~7~~8."
Table 4.14-12	4.14-18	"Daily Trips (one-way)"	Rationale: Please modify to reflect daily trips as two-way (i.e., inbound and outbound trip). SCE recommends the following edits: "Daily Trips (~~one-way~~ two-way)"
4.14.3.3	4.14-19 Lines 2-15	"As shown in Table 4.14-13, significant impacts would occur at three intersections during the AM peak hour: • Garfield Avenue/Pomona Boulevard (Montebello) • Garfield Avenue/Via Campo (Montebello) • Markland Drive/Via Campo – SR 60 EB On-Ramp (Montebello) Additionally, significant impacts would occur at five intersections during the PM peak hour: • Garfield Avenue/Pomona Boulevard (Montebello) • Garfield Avenue/Via Campo (Montebello) • Wilcox Avenue/Pomona Boulevard (Montebello) • Markland Drive/Via Campo – SR 60 EB On-Ramp (Montebello)"	Rationale: Please remove the following intersections as they do not meet their respective significance thresholds. If the CPUC agrees with this edit, information would need to be changed in other areas of the DEIR as well. SCE recommends the following edits: "As shown in Table 4.14-13, significant impacts would occur at three intersections during the AM peak hour: ~~• Garfield Avenue/Pomona Boulevard (Montebello)~~ ~~• Garfield Avenue/Via Campo (Montebello)~~ • Markland Drive/Via Campo – SR 60 EB On-Ramp (Montebello) Additionally, significant impacts would occur at five intersections during the PM peak hour: • Garfield Avenue/Pomona Boulevard (Montebello) • Garfield Avenue/Via Campo (Montebello) ~~• Wilcox Avenue/Pomona Boulevard (Montebello)~~ • Markland Drive/Via Campo – SR 60 EB On-Ramp (Montebello)"
4.14.3.3	4.14-19 Lines 30-38	"Phase I would involve relocation of the Metropolitan Water District of Southern California (MWD) water pipeline under Potrero Grande Drive. Relocation of the MWD water pipeline may require temporary closure of Potrero Grande Drive, which could cause substantial delays along Potrero Grande Drive and would be a significant impact. MM TT-2 would require preparation and implementation of a Road and Lane Closure Plan to	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the local jurisdictions permitting process. SCE requests that CPUC includes compliance language with highway closure measures within MM TT-1, as shown in SCE's proposed language for MM TT-1.

Section	Page	DEIR Language	SCE Recommended Language
		reduce delays. The Plan would be prepared once specific closure locations and durations are known in order to address those specific closures. Impacts would be less than significant with MM TT-2."	SCE recommends the following edits: Phase I would involve relocation of the Metropolitan Water District of Southern California (MWD) water pipeline under Potrero Grande Drive. Relocation of the MWD water pipeline may require temporary closure of Potrero Grande Drive, which could cause substantial delays along Potrero Grande Drive and would be a significant impact. To mitigate these impacts to less than significant, SCE will obtain all appropriate ministerial permits (e.g. encroachment permits and implement appropriate traffic control measures). ~~MM TT-2 would require preparation and implementation of a Road and Lane Closure Plan to reduce delays. The Plan would be prepared once specific closure locations and durations are known in order to address those specific closures. Impacts would be less than significant with MM TT-2.~~
Table 4.14-15	4.14-23	"Daily Trips (one-way)"	Rationale: Please modify to reflect daily trips as two-way (i.e., inbound and outbound trip). SCE recommends the following edits: "Daily Trips (~~one-way~~ two-way)"
4.14.3.3	4.14-25 Lines 25-31	"Phase II would involve stringing of the 220-kV transmission lines across Potrero Grande Drive and SR 60 near Markland Drive. Line stringing would require temporary closure of Potrero Grande Drive, which could cause substantial delays along Potrero Grande Drive. Resulting vehicle backups and change in traffic patterns (e.g., drivers finding alternate routes) would be a significant impact. MM TT-2 would require preparation and implementation of a Road and Lane Closure Plan specific to duration and location of closures, once known, to reduce delays by improving traffic flow during temporary closures. Impacts would be less than significant with MM TT-2."	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the local jurisdictions permitting process. SCE requests that CPUC includes compliance language with highway closure measures within MM TT-1, as shown in SCE's proposed language for MM TT-1. SCE recommends the following edits: "Phase II would involve stringing of the 220-kV transmission lines across Potrero Grande Drive and SR 60 near Markland Drive. Line stringing would require temporary closure of Potrero Grande Drive, which could cause substantial delays along Potrero Grande Drive. Resulting vehicle backups and change in traffic patterns (e.g., drivers finding alternate routes) would be a significant impact. ~~MM TT-2 would require preparation and implementation of a Road and Lane Closure Plan specific to duration and location of closures, once known, to reduce delays by improving traffic flow during temporary closures. Impacts would be less than significant with MM TT-2.~~ To mitigate these impacts to less than significant, SCE will obtain all appropriate ministerial permits (e.g. encroachment permits and implement appropriate traffic control measures)."
Table 4.14-17	4.14-26	"Daily Trips (one-way)"	Rationale: Please modify to reflect daily trips as two-way (i.e., inbound and outbound trip).

Section	Page	DEIR Language	SCE Recommended Language
			SCE recommends the following edits: "Daily Trips (~~one-way~~ two-way)"
4.14.3.3	4.14-28 Lines 2-5	"Phase III would involve stringing of the 500-kV transmission lines across Greenwood Avenue. Line stringing would require temporary closure of Greenwood Avenue, which could cause substantial delays along Greenwood Avenue. MM TT-2 would require preparation and implementation of a Road and Lane Closure Plan to reduce delays. Impacts would be less than significant with MM TT-2."	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the local jurisdictions permitting process. SCE requests that CPUC includes compliance language with highway closure measures within MM TT-1, as shown in SCE's proposed language for MM TT-1. SCE recommends the following edits: "Phase III would involve stringing of the 500-kV transmission lines across Greenwood Avenue. Line stringing would require temporary closure of Greenwood Avenue, which could cause substantial delays along Greenwood Avenue. ~~MM TT-2 would require preparation and implementation of a Road and Lane Closure Plan to reduce delays. Impacts would be less than significant with MM TT-2.~~ To mitigate these impacts to less than significant, SCE will obtain all appropriate ministerial permits (e.g. encroachment permits and implement appropriate traffic control measures)."
4.14.3.3	4.14-28 Lines 27-33	"Work within the South Area would require lane reductions for a temporary period to complete streetlight source undergrounding activities within Loveland Street. These activities would be short term in duration, but could cause a significant impact to traffic flow. MM TT-2 would require implementation of measures to ensure safe passage of vehicles through the area during construction activities, such as signage and detour routes. Impacts would be less than significant with mitigation."	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the local jurisdictions permitting process. SCE requests that CPUC includes compliance language with highway closure measures within MM TT-1, as shown in SCE's proposed language for MM TT-1. SCE recommends the following edits: "Work within the South Area would require lane reductions for a temporary period to complete streetlight source undergrounding activities within Loveland Street. These activities would be short term in duration, but could cause a significant impact to traffic flow. To mitigate these impacts to less than significant, SCE will obtain all appropriate ministerial permits (e.g. encroachment permits and implement appropriate traffic control measures). ~~MM TT-2 would require implementation of measures to ensure safe passage of vehicles through the area during construction activities, such as signage and detour routes. Impacts would be less than significant with mitigation.~~"
4.14.3.3	4.14-30 Lines 19-26	"Telecommunications Route 2B would cross SR 60 but would be placed underground and cross under the SR 60 underpass. It would not interrupt traffic on SR 60. Telecommunications Route 2A would cross SR 60 overhead. SR 60 would need to be temporarily closed in order to install the fiber optic cable across the roadway. The closure could cause a significant impact if it occurred during peak hours or during daytime hours. MM TT-3 would require preparation of a Highway Closure Plan, which would be written once specific information about closure duration is known. The Plan would reduce impacts by, in part, limiting the time of the closure to outside of peak traffic times. Impacts would be less than significant with mitigation."	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the Caltrans permitting process. Route 2B is a small part of an overall much larger maintenance Sumitomo Replacement Program scope to replace a fiber optic cable which has been identified as past its field life span. This projects route spans from the Mesa Substation to the Laguna Bell Substation and is expect to begin construction by mid-June is all goes as planned. The Sumitomo Replacement project has received an Authorization to Proceed, Real Properties clearance for construction, rail road acquisitions, and permits have been acquired for the multiple cities impacted by this project.

Section	Page	DEIR Language	SCE Recommended Language
			SCE recommends the following edits: "~~Telecommunications Route 2B would cross SR 60 but would be placed underground and cross under the SR 60 underpass. It would not interrupt traffic on SR 60.~~ Telecommunications Route 2A would cross SR 60 overhead. SR 60 would need to be temporarily closed in order to install the fiber optic cable across the roadway. The closure could cause a significant impact if it occurred during peak hours or during daytime hours. ~~MM TT-3 would require preparation of a Highway Closure Plan, which would be written once specific information about closure duration is known. The Plan would reduce impacts by, in part, limiting the time of the closure to outside of peak traffic times. Impacts would be less than significant with mitigation.~~ To mitigate these impacts to less than significant, SCE will obtain all appropriate Caltrans permits (e.g. encroachment permits and implement appropriate traffic control measures)."
4.14.3.3	4.14-33 and 4.14-34 Lines 26-28 and Lines 1-11	"The FAA requires that all pilots, crew members, and helicopters involved with external load operations (e.g., wire stringing) be certified pursuant 1 to 14 CFR 133 (External-Load Operations). Pursuant to FAA and Occupational Safety and Health Administration requirements, briefings must be completed prior to each day of helicopter operation regarding the plan of operation for the pilot and all ground personnel. Additionally, cargo hooks used for securing helicopter external loads must be tested electrically and mechanically prior to each day of operation. Flights in close proximity to residences or congested areas would result in significant safety impacts. MM TT-4 would require submittal of a Helicopter Lift Plan to the FAA prior to such operations. Impacts would be less than significant with implementation of the Helicopter Lift Plan, which requires certain safety precautions."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE did not include the use of helicopters for external load operations in the PEA. If SCE does use helicopters, SCE will comply with FAA requirements, negating the need for MM TT-4. SCE recommends the following edits: "~~The FAA requires that all pilots, crew members, and helicopters involved with external load operations (e.g., wire stringing) be certified pursuant 1 to 14 CFR 133 (External-Load Operations). Pursuant to FAA and Occupational Safety and Health Administration requirements, briefings must be completed prior to each day of helicopter operation regarding the plan of operation for the pilot and all ground personnel. Additionally, cargo hooks used for securing helicopter external loads must be tested electrically and mechanically prior to each day of operation. Flights in close proximity to residences or congested areas would result in significant safety impacts. MM TT-4 would require submittal of a Helicopter Lift Plan to the FAA prior to such operations. Impacts would be less than significant with implementation of the Helicopter Lift Plan, which requires certain safety precautions.~~ If external load operations become needed, SCE will ensure that all pilots, crew members, and helicopters involved with external load operations (e.g., wire stringing) be certified pursuant 1 to 14 CFR 133 (External-Load Operations)."
4.14.3.3	4.14-34 Lines 18-22	"Construction activities on the power lines and at the substation may involve equipment that is over 200 (61 meters) feet in height, triggering FAA notification under 14 CFR 77. Tall structures may pose a safety hazard to air traffic, which would be a significant impact. MM TT-5, which would require SCE to obtain a no hazard determination from the FAA when notification under 14 CFR 77 is required, would be implemented to reduce impacts to less than significant."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. Furthermore, SCE has performed a prescreening on structures via ASI to determine that structures are under threshold. SCE will comply with FAA noticing requirements, negating the need for MM TT-5. SCE recommends the following edits: "Construction activities on the power lines and at the substation may involve equipment that is over 200 (61

Section	Page	DEIR Language	SCE Recommended Language
			meters) feet in height, triggering FAA notification under 14 CFR 77. Tall structures may pose a safety hazard to air traffic, which would be a significant impact. ~~MM TT-5, which would require SCE to obtain a no hazard determination from the FAA~~ SCE would comply with FAA requirements when notification under 14 CFR 77 is required, therefore ~~would be implemented to reduce~~ reducing impacts to less than significant."
4.14.3.3	4.14-34 Lines 38-43	"The applicant would notify and consult with the FAA if any structure were to exceed 200 feet (61 meters) in height or to exceed the imaginary surface extending from runways as described in 14 CFR 77. Only structures at the Mesa Substation may exceed the 200-foot (61-meter) height; no structures would exceed the imaginary surface of any airport. Tall structures may pose a safety hazard to air traffic, which would be a significant impact. MM TT-5 would be implemented to reduce impacts to less than significant."	Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. SCE will comply with FAA noticing requirements, negating the need for MM TT-5. SCE recommends the following edits: "As required by law, the applicant would notify and consult with the FAA if any structure were to exceed 200 feet (61 meters) in height or to exceed the imaginary surface extending from runways as described in 14 CFR 77, thereby reducing impacts to less than significant. Only structures at the Mesa Substation may exceed the 200-foot (61-meter) height; no structures would exceed the imaginary surface of any airport. ~~Tall structures may pose a safety hazard to air traffic, which would be a significant impact. MM TT-5 would be implemented to reduce impacts to less than significant.~~"
4.14.3.3	4.14-35 Lines 35-37	"MM TT-6 would require posting warning signs so that motorists can be prepared for slow trucks. Impacts would be less than significant with the implementation of MM TT-6, which would require signage warning of slow trucks during delivery and exit hours."	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the jurisdictional permitting process. These conditions are typically covered in encroachment permits. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1, as shown in SCE's proposed language for MM TT-1. SCE recommends the following edits: "~~MM TT-6 would require posting warning signs so that motorists can be prepared for slow trucks. Impacts would be less than significant with the implementation of MM TT-6, which would require signage warning of slow trucks during delivery and exit hours.~~ To mitigate these impacts to less than significant, traffic control measures will be described in the traffic control plan required in MM TT-1."
4.14.3.3	4.14-36 Lines 38-47	"Relocation of the MWD water pipeline within Potrero Grande Drive and places where the components of the proposed Mesa Project span a road may require a lane closure during Horizontal Directional Drilling activities. Installation of telecommunications and power lines along roadways, including SR 60, would also require temporary road or lane closures where lines cross roadways and where crews are working. Closure of roadways or lanes would significantly impact emergency access. MM TT-8 would require coordination with local emergency services providers so that the local	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the jurisdictional permitting process. These conditions are typically covered in encroachment permits. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1, as shown in SCE's proposed language for MM TT-1.

Section	Page	DEIR Language	SCE Recommended Language
		emergency service providers can anticipate road closures and so that SCE is required to provide emergency access. Impacts would be less than significant with mitigation."	SCE recommends the following edits: "Relocation of the MWD water pipeline within Potrero Grande Drive and places where the components of the proposed Mesa Project span a road may require a lane closure during Horizontal Directional Drilling activities. Installation of telecommunications and power lines along roadways, including SR 60, would also require temporary road or lane closures where lines cross roadways and where crews are working. Closure of roadways or lanes would significantly impact emergency access. ~~MM TT-8 would require coordination~~ SCE will obtain permits from local jurisdictions, ~~with~~ which require coordination with local emergency services providers so that the local emergency service providers can anticipate road closures ~~and~~ so that SCE is required to provide emergency access~~. I~~, thereby impacts would be less than significant ~~with mitigation~~."
4.14.3.3	4.14-36 Lines 15-21	"The applicant would obtain the necessary permits and would avoid local roads that prohibit other heavy truck traffic when possible. Compliance with existing regulations, including applicable state and local permitting requirements, would reduce significant impacts from hazards. MM TT-7 would require that SCE repair road damage caused directly as a result of ground disturbing activities (e.g., trenching within the road) as well as damage caused by project vehicle traffic."	Rationale: As the applicant will comply with permit conditions, the application of MM TT-7 is unnecessary and should be eliminated. SCE recommends the following edits: "The applicant would obtain the necessary permits and would avoid local roads that prohibit other heavy truck traffic when possible. Compliance with existing regulations, including applicable state and local permitting requirements, would reduce significant impacts from hazards. ~~MM TT-7 would require that SCE repair road damage caused directly as a result of ground disturbing activities (e.g., trenching within the road) as well as damage caused by project vehicle traffic.~~"
4.14.3.3	4.14-37 Lines 38-41	"Implementation of MM TT-9 would require preparation of a Public Transit, Pedestrian and Bicyclist Plan that takes into account the location and duration of public transit stop closures, sidewalk closures, and bike lane closures once known. The Plan would reduce the impacts to less than significant through implementation of measures such as temporary transit stop relocation."	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the jurisdictional permitting process. These conditions are typically covered in encroachment permits. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1, as shown in SCE's proposed language for MM TT-1. SCE recommends the following edits: "~~Implementation of MM TT-9 would require preparation of a Public Transit, Pedestrian and Bicyclist Plan that takes into account the location and duration of public transit stop closures, sidewalk closures, and bike lane closures once known. The Plan would reduce the impacts to less than significant through implementation of measures such as temporary transit stop relocation.~~ To mitigate these impacts to less than significant, SCE will work with the local jurisdiction through established permitting processes to identify and implement appropriate traffic control measures. In addition, traffic controls measures will be described in traffic control plan required in MM TT-1."

Section	Page	DEIR Language	SCE Recommended Language
4.14.3.3	4.14-38 Lines 26-27	"Implementation of MM TT-10 would require SCE to provide traffic control if the exit is closed for Telecommunications Route 3 work. Impacts would be less than significant with mitigation."	Rationale: Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the jurisdictional permitting process. These conditions are typically covered in encroachment permits. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1. SCE recommends the following edits: "~~Implementation of MM TT-10 would require SCE to provide traffic control if the exit is closed for Telecommunications Route 3 work. Impacts would be less than significant with mitigation.~~ <u>To mitigate these impacts to less than significant, SCE will work with the local jurisdiction through established permitting processes to identify and implement appropriate traffic control measures. In addition, traffic controls measures will be described in traffic control plan required in MM TT-1.</u>"
4.14.3.4	4.14-39 Lines 3-24	"**MM TT-1: Peak Period Traffic Management Plan.** SCE shall prepare and implement a Peak Period Traffic Management Plan, which may be included in a larger Transportation Management Plan for the project, and shall submit the Plan for CPUC review and approval at least 60 days prior to the start of construction. The Plan shall identify specific measures that would reduce significant impacts to significantly affected intersections during the AM or PM peak hours (and during the specified phase) to less than significant levels, i.e., reduce the V/C increase resulting from the proposed project at each identified intersection to at or below the applicable threshold. Primary measures may include: • Limiting project-related heavy truck trips during peak hours (e.g., through scheduling deliveries outside of peak hours) so as to reduce trips occurring during peak hours; and • Limiting project construction worker vehicle trips during peak hours (e.g., through requiring carpooling) so as to reduce trips occurring during peak hours. Specific measures would be dependent on the final construction schedule and residing location of construction workers. Measures implemented as part of the plan shall not result in exceedance of applicable thresholds as described in this document at other impacted intersections. The plan shall also demonstrate that mitigation would not result in V/C to exceed thresholds at significantly impacted and non-significantly impacted roads and intersections."	Rationale: Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1, as shown in SCE's proposed language for MM TT-1 below. In addition, SCE has added language to MM TT-1 that includes references to MM TT-2, 4, 5, and 7 where SCE will follow existing laws and regulations. SCE recommends the following edits: "~~**MM TT-1: Peak Period Traffic Management Plan.** SCE shall prepare and implement a Peak Period Traffic Management Plan, which may be included in a larger Transportation Management Plan for the project, and shall submit the Plan for CPUC review and approval at least 60 days prior to the start of construction.~~ ~~The Plan shall identify specific measures that would reduce significant impacts to significantly affected intersections during the AM or PM peak hours (and during the specified phase) to less than significant levels, i.e., reduce the V/C increase resulting from the proposed project at each identified intersection to at or below the applicable threshold.~~ ~~Primary measures may include:~~ ~~• Limiting project-related heavy truck trips during peak hours (e.g., through scheduling deliveries outside of peak hours) so as to reduce trips occurring during peak hours; and~~ ~~• Limiting project construction worker vehicle trips during peak hours (e.g., through requiring carpooling) so as to reduce trips occurring during peak hours.~~ ~~Specific measures would be dependent on the final construction schedule and residing location of construction workers. Measures implemented as part of the plan shall not result in exceedance of applicable thresholds as described in this document at other impacted intersections. The plan shall also demonstrate that mitigation would not result in V/C to exceed thresholds at significantly impacted and non-significantly impacted roads and intersections.~~

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
			MM TT-1: Traffic Control Plan. The Plan shall be consistent with the California Joint Utility Traffic Control Manual (CJUTCM) and include, at a minimum, measures to ensure that: 1. Significant impacts to affected intersections during the AM or PM peak hours (and during the specified phase) are reduced to less than significant levels, i.e., reduce the V/C increase resulting from the proposed project at each identified intersection to at or below the applicable threshold. Primary measures may include: • Limiting project-related heavy truck trips during peak hours (e.g., through scheduling deliveries outside of peak hours) so as to reduce trips occurring during peak hours; and • Limiting project construction worker vehicle trips during peak hours (e.g., through requiring carpooling) so as to reduce trips occurring during peak hours. 2. General plans or guidelines be developed to provide safety for motorists, bicyclists, pedestrians, workers, enforcement/emergency officials and equipment in consideration of basic safety principles to route roadway users through construction zones using roadway geometrics and features and traffic control devices comparable to normal roadway situation as possible. The Plan detail shall be appropriate to the complexity of the project work. 3. Roadway user movement should be inhibited as little as practical, based on the recommended considerations of the California Manual on Uniform Traffic Control Devices (CA MUTCD) latest edition, including proper signage, avoiding abrupt changes in geometrics, reducing traffic volume by using alternate routes scheduling work in off-peak hours, and complying with the Americans with Disabilities Act of 1990 (ADA). 4. During truck delivery and exit hours, SCE shall post slow truck warning signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the CA MUTCD. 5. Motorists, bicyclists and pedestrians are guided in a clear and positive manner while approaching and traversing TTC zones and incident sites, applying the principles for proper marking, signing, and flagging. 6. Acceptable levels of operations are provided and routine day and night inspections of Plan elements are implemented. 7. Roadside safety is maintained during the life of the project to accommodate disabled vehicles, run-off-the-road incidents, and emergency situations. 8. Appropriate field workers and management receive training appropriate to the job decisions each individual is required to make. 9. Good public relations are maintained by assessing the needs of the road users, abutting property owners, and

Section	Page	DEIR Language	SCE Recommended Language
			emergency service providers (law enforcement, fire fighters, and medical) and cooperating with various news media, SCE shall notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of road closures at least 1 week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE would also make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers, such as keeping metal plates available to cover open trenches. Specific measures would be dependent on the final construction schedule and residing location of construction workers. Measures implemented as part of the plan shall not result in exceedance of applicable thresholds as described in this document at other impacted intersections. The plan shall also demonstrate that mitigation would not result in V/C to exceed thresholds at significantly impacted and non-significantly impacted roads and intersections." Roadway, highway and lane closure plans shall be prepared and implemented as required and in coordination with the applicable local and Caltrans jurisdictions. Appropriate advance notifications shall be made to the affected jurisdictions and affected property owners. The Plans shall describe locations and durations of: • Full road closures • Lane closures • Bicycle lane closures • Sidewalk or pedestrian path closures • Parking lot and Park-N-Ride lot closures The highway closure measures shall minimize delays to SR-60 traffic. No work shall occur in Caltrans right-of-way until Caltrans issues the encroachment permit and approves the Traffic Control Plan.
4.14.3.4	4.14-39 and 4.41-40 Lines 26-45 and Lines 1-8	"**MM TT-2: Road and Lane Closure Plan.** SCE shall develop a Road and Lane Closure Plan for the proposed project that outlines how SCE will handle road and lane closures to allow for safe vehicle, bicyclist, and pedestrian passage when road and lane closures occur. The Plan shall be prepared in coordination with local jurisdictions where road and lane closures would occur. Upon determination of the final construction schedule and precise locations and durations of road and lane closures, the Plan shall describe locations and durations of: • Full road closures • Lane closures • Bicycle lane closures • Sidewalk or pedestrian path closures Measures to be included in the Plan that would allow for safe vehicle, bicyclist, and pedestrian passage shall adhere to the California Manual on Uniform Traffic Control Devices. Potential measures include:	Rationale: Traffic control is the responsibility of Cal Trans and local governing agencies. 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. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1. SCE recommends the following edits: "~~**MM TT-2: Road and Lane Closure Plan.** In coordination with local jurisdictions, SCE shall develop a Road and Lane Closure Plans for the proposed project components that outlines how SCE will handle will require road and lane closures to allow for safe vehicle, bicyclist, and pedestrian passage when road and lane closures occur. The Plan shall be prepared in coordination with local jurisdictions where road and lane closures would occur. Upon determination of the final construction schedule and precise locations and durations of road and lane closures, the~~

Section	Page	DEIR Language	SCE Recommended Language
		• Signage directing motorists, pedestrians, and bicyclists to an efficient, safe detour around the closure • Flaggers and/or signage to halt traffic at road closures or direct traffic at lane closures and to allow traffic to pass when construction is halted • Requirements for notifications and a process for communication with affected residents and l• Emergency service providers would be notified of the timing, location, and duration of construction activities. • Requirement that emergency vehicle access is maintained at all times. The Road and Lane Closure Plan can be included as part of a Transportation Management Plan for the project."	~~Plan shall describe locations and durations of:~~ ~~• Full road closures~~ ~~• Lane closures~~ ~~• Bicycle lane closures~~ ~~• Sidewalk or pedestrian path closures~~ ~~Measures to be included in the Plan that would allow for safe vehicle, bicyclist, and pedestrian passage shall adhere to the California Manual on Uniform Traffic Control Devices. Potential measures include:~~ ~~• Signage directing motorists, pedestrians, and bicyclists to an efficient, safe detour around the closure~~ ~~• Flaggers and/or signage to halt traffic at road closures or direct traffic at lane closures and to allow traffic to pass when construction is halted~~ ~~• Requirements for notifications and a process for communication with affected residents and l• Emergency service providers would be notified of the timing, location, and duration of construction activities.~~ ~~• Requirement that emergency vehicle access is maintained at all times.~~ ~~The Road and Lane Closure Plan can be included as part of a Transportation Management Plan for the project.~~"
4.14.3.4	4.14-40 Lines 10-22	**"MM TT-3: Highway Closure Plan.** SCE shall prepare a Highway Closure Plan to include in its encroachment permit application for crossings of SR-60 that require closure or partial closure of SR-60. The Highway Closure Plan shall: • Specify that partial and complete closures of SR-60 are prohibited during peak and daytime (5 a.m. to 10 p.m.) hours. • Require that SCE adhere to Caltrans' requirements regarding signage to notify motorists of the impending closure. • Map potential detours for SR-60 traffic. The measures in the plan shall minimize delays to SR-60 traffic. No work shall occur in Caltrans right-of-way until Caltrans issues the encroachment permit and approves the Highway Closure Plan."	Rationale: Traffic control is the responsibility of Cal Trans and local governing agencies. 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. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1. SCE recommends the following edits: "~~**MM TT-3: Highway Closure Plan.** SCE shall prepare a Highway Closure Plan to include in its encroachment permit application for crossings of SR-60 that require closure or partial closure of SR-60. The Highway Closure Plan shall:~~ ~~• Specify that partial and complete closures of SR-60 are prohibited during peak and daytime (5 a.m. to 10 p.m.) hours.~~ ~~• Require that SCE adhere to Caltrans' requirements regarding signage to notify motorists of the impending closure.~~ ~~• Map potential detours for SR-60 traffic.~~ ~~The measures in the plan shall minimize delays to SR-60 traffic. No work shall occur in Caltrans right-of-way until Caltrans issues the encroachment permit and approves the Highway Closure Plan.~~"
4.14.3.4	4.14-40 Lines	"**MM TT-4: Helicopter Lift Plan.** SCE's helicopter contractor shall coordinate with FAA and obtain FAA-required approvals for helicopter operations. SCE's contractor's submittal shall include a Helicopter Lift Plan for operations within 1,500 feet (457 meters) of a congested area or within 1,500 feet (457 meters) of residences in compliance with 14 CFR 133.33, which requires that flights	Rationale: If external load operations become needed, SCE will ensure that all pilot, crew members, and helicopters involved in external load operations (e.g. wire stringing) be certified pursuant to 14 CFR 133 (External Load Operations).

Section	Page	DEIR Language	SCE Recommended Language
	24-38	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. Measures may include: • Designating who is responsible for equipment inspections • Communication procedures • Establishment of exclusion zones where pedestrians will not be allowed • Training of personnel in safety requirements and procedures The Plan and record of FAA approval shall be provided to the CPUC prior to commencing helicopter operations.”	Please refer to same rationale under impact analysis for MM TT-4. SCE recommends the following edits: “~~**MM TT-4: Helicopter Lift Plan.** SCE’s helicopter contractor shall coordinate with FAA and obtain FAA-required approvals for helicopter operations. SCE’s contractor’s submittal shall include a Helicopter Lift Plan for operations within 1,500 feet (457 meters) of a congested area or within 1,500 feet (457 meters) 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. Measures may include:~~ ~~• Designating who is responsible for equipment inspections~~ ~~• Communication procedures~~ ~~• Establishment of exclusion zones where pedestrians will not be allowed~~ ~~• Training of personnel in safety requirements and procedures~~ ~~The Plan and record of FAA approval shall be provided to the CPUC prior to commencing helicopter operations.~~”
4.14.3.4	4.14-40 and 4.14-41 Lines 40-44 and Lines 1-2	“**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; and • Installation of structures, such as lattice steel towers. SCE shall provide documentation of the FAA finding to the CPUC prior to 1 the use of equipment or installation of structures that require notification under 14 CFR 77.”	Rationale: SCE will comply with FAA noticing requirements when notification under 14 CFR 77 is required to reduce impacts to less than significant. Please refer to same rationale under impact analysis for MM TT-5. SCE recommends 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; and~~ ~~• Installation of structures, such as lattice steel towers.~~ ~~SCE shall provide documentation of the FAA finding to the CPUC prior to 1 the use of equipment or installation of structures that require notification under 14 CFR 77.~~”
4.14.3.4	4.14-41 Lines 4-8	“**MM TT-6: Slow Truck Warnings.** During truck delivery and exit hours, SCE shall post signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the California Manual on Uniform Traffic Control Devices.”	Rationale: 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. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1. SCE recommends the following edits: “~~**MM TT-6: Slow Truck Warnings.** During truck delivery and exit hours, SCE shall post signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to~~

Section	Page	DEIR Language	SCE Recommended Language
			~~warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the California Manual on Uniform Traffic Control Devices.~~"
4.14.3.4	4.14-41 Lines 10-16	"**MM TT-7: Road Damage Repair.** SCE shall repair to pre-project conditions any roads damaged by project vehicle traffic within 60 days of completion of construction. 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 any repairs that document restoration of pre-project pavement conditions. Documentation of original conditions and repair shall be submitted to the CPUC for review and verification within 30 days of repair completion."	Rationale: 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. The applicant will comply with permit conditions related to Road Damage Repair to reduce impacts to less than significant. Please refer to same rationale under impact analysis for MM TT-7. SCE recommends the following edits: "~~**MM TT-7: Road Damage Repair.** SCE shall repair to pre-project conditions any roads damaged by project vehicle traffic within 60 days of completion of construction. 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 any repairs that document restoration of pre-project pavement conditions. Documentation of original conditions and repair shall be submitted to the CPUC for review and verification within 30 days of repair completion.~~"
4.14.3.4	4.14-41 Lines 18-23	"**MM TT-8: 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 1 week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE would also make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers, such as keeping metal plates available to cover open trenches."	Rationale: 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. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1. SCE recommends the following edits: "~~**MM TT-8: 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 1 week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE would also make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers, such as keeping metal plates available to cover open trenches.~~"
4.14.3.4	4.14-41 and 4.14-42 Lines 25-48 and Lines	"**MM TT-9: Public Transit, Pedestrian, and Bicyclist Plan.** SCE shall develop and implement a Public Transit, Pedestrian, and Bicyclist Plan with the goal of maintaining safe conditions for pedestrians and bicyclists during construction of the proposed project. Safe conditions include detours for closed sidewalks and closed bicycle lanes as well as relocation of transit stops to areas not affected by construction activities. The control measures included in the Plan shall be based on final plans for closures of sidewalks and bicycle lanes and transit stops. The measures shall be consistent with those published in the California Joint Utility Traffic Control Manual (California Inter-Utility Coordinating Committee 2010).The Plan should include, at a minimum, the measures listed below:	Rationale: 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. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1. SCE recommends the following edits:

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
	1-2	• Notify LA Metro and other public transit providers of construction along existing public transit routes. The applicant would work with transit providers to temporarily relocate transit stops during construction, if needed. • Provide pedestrians with reasonably safe, convenient, and accessible paths that replicate as nearly as possible the most desirable characteristics of the existing paths (i.e., maintaining sidewalk and bicycle access on at least one side of affected streets during construction). • Layout plans for notifications and a process for communication with affected transit riders, pedestrians, and bicyclists prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which transit routes, bus stops, sidewalks, and bicycle routes would be affected on which days and for how long), and a toll-free telephone number for receiving questions or complaints. • Post detour signs during construction of alternative routes for pedestrians and bicyclists. • Install steel plates over open trenches in inactive construction areas 1 to maintain existing bicycle and pedestrian access after construction hours.”	“~~**MM TT-9: Public Transit, Pedestrian, and Bicyclist Plan.** SCE shall develop and implement a Public Transit, Pedestrian, and Bicyclist Plan with the goal of maintaining safe conditions for pedestrians and bicyclists during construction of the proposed project. Safe conditions include detours for closed sidewalks and closed bicycle lanes as well as relocation of transit stops to areas not affected by construction activities. The control measures included in the Plan shall be based on final plans for closures of sidewalks and bicycle lanes and transit stops. The measures shall be consistent with those published in the California Joint Utility Traffic Control Manual (California Inter-Utility Coordinating Committee 2010).The Plan should include, at a minimum, the measures listed below:~~ ~~• Notify LA Metro and other public transit providers of construction along existing public transit routes. The applicant would work with transit providers to temporarily relocate transit stops during construction, if needed.~~ ~~• Provide pedestrians with reasonably safe, convenient, and accessible paths that replicate as nearly as possible the most desirable characteristics of the existing paths (i.e., maintaining sidewalk and bicycle access on at least one side of affected streets during construction).~~ ~~• Layout plans for notifications and a process for communication with affected transit riders, pedestrians, and bicyclists prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which transit routes, bus stops, sidewalks, and bicycle routes would be affected on which days and for how long), and a toll-free telephone number for receiving questions or complaints.~~ ~~• Post detour signs during construction of alternative routes for pedestrians and bicyclists.~~ ~~• Install steel plates over open trenches in inactive construction areas 1 to maintain existing bicycle and pedestrian access after construction hours.~~”
4.14.3.4	4.14-42 Lines 4-9	“**MM TT-10: Whittier Narrows Park-and-Ride Lot.** If proposed project work on Telecommunications Route would result in temporary closure of the Whittier Narrows park-and ride lot exit to Durfee Avenue, SCE shall coordinate with Los Angeles County and the Whitter Narrows Recreation Area so that SCE can provide traffic control for two-way traffic at the Santa Anita Avenue entrance to the Whittier Narrows park-and-ride lot during the Durfee Avenue exit closure.”	Rationale: 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. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1. SCE recommends the following edits: “~~**MM TT-10: Whittier Narrows Park-and-Ride Lot.** If proposed project work on Telecommunications Route would result in temporary closure of the Whittier Narrows park-and ride lot exit to Durfee Avenue, SCE shall coordinate with Los Angeles County and the Whitter Narrows Recreation Area so that SCE can provide traffic control for two-way traffic at the Santa Anita Avenue entrance to the Whittier Narrows park-and-ride lot during the Durfee Avenue exit closure.~~”
4.14.3.4	4.14-42 Lines 11-22	“**MM TT-11: Community Education Center Parking.** If proposed project work at the Goodrich Substation would result in parking spot closures at the Community Education Center parking lot, SCE shall coordinate scheduled closures with the Community Education Center and shall obtain a letter from the Community Education Center that states: • The dates of parking spot closures;	Rationale: Please update mitigation measure numbering to conform to SCE’s proposed changes. Please update the name of education center.

Section	Page	DEIR Language	SCE Recommended Language
		• The number of parking spots that would be closed; and • That the Community Education Center concurs that there will be sufficient parking spots to accommodate SCE's work and the Community Education Center's parking needs. SCE shall submit the letter to the CPUC 30 days prior to Community Education Center parking spot closure."	SCE recommends the following edits: "**MM TT-~~11~~ 2**: Pasadena City College Community Education Center Parking. If proposed project work at the Goodrich Substation would result in parking spot closures at the Pasadena City College Community Education Center parking lot, SCE ~~shall~~ will coordinate scheduled closures with the Pasadena City College Community Education Center on the following ~~and shall obtain a letter from the Community Education Center that states~~: • The dates of parking spot closures; • The number of parking spots that would be closed; and • That the Pasadena City College Community Education Center concurs that there will be sufficient parking spots to accommodate SCE's work and the Pasadena City College Community Education Center's parking needs. SCE ~~shall~~ will ~~submit the letter~~ provide documentation of the coordination with the Pasadena City College Community Education Center to the CPUC 30 days prior to Pasadena City College Community Education Center parking spot closure."
COMPARISON OF ALTERNATIVES **Note: SCE has provided in-depth comments regarding the alternatives evaluated. Please see SCE's comment letter accompanying this comment table.**			
5.3.2.1	5-4 Lines 18-24	"Construction of the One-Transformer-Bank Substation Alternative would result in reduced aesthetic impacts. The 500-kV switchrack would be about half the size of the switchrack for the proposed projects, which would result in fewer structures at the substation visible from viewpoints on Potrero Grande Drive. However, the transformer bank and 500-kV switchrack would be located adjacent to Potrero Grande Drive, closer to viewers, meaning that the new substation structures would still be visually dominant. The reduction in visual impacts (Impact AE-1) would be slight compared to the proposed project's visual impacts."	Rationale: As noted above, the DEIR incorrectly identifies significant aesthetic impacts of the proposed project. The Less than significant impacts of this alternative would be the same as the proposed project. The DEIR conclusions regarding Visual Impacts of Alternatives are not supported by technical analysis. For example, visual simulations were not prepared to support the aesthetics alternatives evaluation. The DEIR states that the 500-kV switchrack would be about half the size of the switchrack for the proposed project which would result in fewer structures at the substation visible from viewpoints on Potrero Grande Drive, and that the transformer bank and 500-kV switchrack would be located adjacent to Potrero Grande Drive, closer to viewers, which mean the new substation structures would be visually dominant. However, in terms of views from the roadway, the DEIR provides no evidence to support a conclusion that potential aesthetic effects associated with the alternative would be preferable to the impacts associated with the proposed project. In fact, the less than significant impacts of this alternative would be the same as the proposed project. As noted above, the DEIR incorrectly identifies significant aesthetic impacts of the proposed project. We also note that no simulations were prepared to support the conclusions of the Aesthetics alternatives analysis. SCE recommends the following edits:

Section	Page	DEIR Language	SCE Recommended Language
			"Construction of the One-Transformer-Bank Substation Alternative would result in similar aesthetic impacts compared to the Proposed Project. The 500-kV switchrack would be about half the size of the switchrack for the proposed project, which would result in fewer structures at the substation visible from viewpoints on Potrero Grande Drive. However, the transformer bank and 500-kV switchrack would be located adjacent to Potrero Grande Drive, closer to viewers, meaning that the new substation structures would be visually dominant. The ~~reduction in~~ less than significant visual impacts (Impact AE-1) would be ~~slight compared to~~ comparable to the proposed project's visual impacts."
Table 5.3-3	5-8	Table 5.3-3 indicates that the three alternatives will have less construction noise impact than the proposed project and that the Gas-Insulated Substation is ranked higher than the other two alternatives. **Noise - Impact NV-4 (significant and unavoidable)** "Less"	Rationale: The analysis does not clearly indicate if any of the alternatives will result in lower noise impacts. The analysis purports only that there may be a negligible decrease in impact. There is no evidence that any of the alternatives will reduce noise impacts to a less-than-significant level (Impact NV-4). All alternatives should be changed from "Less" to "Similar" in each of the three alternatives columns. Additionally, please update the Environmentally Superior Alternative column to "Equal". SCE recommends the following edits: **Noise - Impact NV-4 (significant and unavoidable)** ~~"Less~~ Similar" **Environmentally Superior Alternative** ~~"Gas-Insulated Substation~~ Equal"
Table 5.3-3	5-9	"(3) All three alternatives have approximately the same environmental impact such that none are superior to the other considered alternatives but are superior to the proposed project."	Rationale: Since the alternatives are not reducing impact levels, Note 3 should be amended as follows: SCE recommends the following edits: "(3) All three alternatives have approximately the same environmental impact such that none are superior to the other considered ~~but are superior to the proposed project~~ alternatives ~~but are superior to~~ or the proposed project."
5.3.2.1	5-10 Lines 42-44	"The potential for erosion and loss of topsoil during construction of the One-Transformer-Bank Substation Alternative would be lower than for the proposed project due to reduced ground disturbance."	Rationale: If the same soil types are encountered during ground disturbance, even within a smaller substation footprint, the potential for erosion during each individual ground-disturbing activity would be the same. The potential for soil erosion would decrease only if soils susceptible to erosion are excluded from disturbance based on the alternative footprint of the substation. The reduction of work areas involving ground disturbance does not necessarily lower the overall potential for erosion during construction. The impact level of the alternative as stated in Table 5.3-3 Summary of the Alternatives Analyses and Determinations should be changed to "Similar." SCE recommends the following edits: "The potential for erosion and loss of topsoil during construction of the One-Transformer-Bank Substation Alternative would be ~~lower~~ similar ~~than for~~ to the proposed project ~~due to reduced ground disturbance~~."

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
5.3.2.1	5-12 Lines 19-26	"Noise from the proposed project may be reduced under the One-Transformer-Bank Substation Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The One-Transformer-Bank Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive receptors on Holly Oak Drive by approximately 170 feet. Thus, noise impacts at these receptors would be reduced by about 2 A-weighted decibels (dBA). Reduction in noise by 2 dBA would not result in a perceptible difference in noise levels. Construction of the One-Transformer-Bank Substation Alternative would negligibly reduce noise impacts (Impact NV-4) compared to the impacts of the proposed project."	Rationale: Construction noise is related to the number of equipment, noise emission of each, and distance from the equipment to the receiver. In addition, noise impacts are based upon a daily or hourly value. It is unclear from the analysis if this alternative has less construction equipment on site during the noisiest hour or the noisiest day and if they will actually be 170 feet further away from noise sensitive receptors on Holly Oak Drive. Increasing distance from 1,040 ft to 1,210 ft would result in closer to 1 dBA reduction rather than 2 dBA reduction. SCE recommends the following edits: "Noise from the proposed project may be reduced under the One-Transformer-Bank Substation Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The One-Transformer-Bank Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive receptors on Holly Oak Drive by approximately 170 feet. Thus, noise impacts at these receptors would be reduced by about 1 A-weighted decibels (dBA). Reduction in noise by 1 dBA would not result in a perceptible difference in noise levels. Therefore, this alternative would not reduce noise impacts when compared to the proposed project. ~~alternative Construction of the One-Transformer-Bank Substation Alternative would negligibly reduce noise impacts (Impact NV-4) compared to the impacts of the proposed project.~~"
5.3.2.2	5-15 Lines 6-8	"The potential for erosion and loss of topsoil during construction of the Two-Transformer-Bank Substation Alternative would be lower than for the proposed project due to reduced ground disturbance."	Rationale: If the same soil types are encountered during ground disturbance, even within a smaller substation footprint, the potential for erosion during each individual ground-disturbing activity would be the same. The potential for soil erosion would decrease only if soils susceptible to erosion are excluded from disturbance based on the alternative footprint of the substation. The reduction of work areas involving ground disturbance does not necessarily lower the overall potential for erosion during construction. The impact level of the alternative as stated in Table 5.3-3 Summary of the Alternatives Analyses and Determinations should be changed to "Similar." SCE recommends the following edits: "The potential for erosion and loss of topsoil during construction of the Two-Transformer-Bank Substation Alternative would be ~~lower~~ similar ~~than for~~ to the proposed project ~~due to reduced ground disturbance~~."
5.3.2.2	5-16 Lines 28-35	"Noise from the proposed project may be reduced under the Two-Transformer-Bank Substation Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The Two-Transformer-Bank Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive receptors on Holly Oak Drive by approximately 170 feet. Thus, noise impacts at these receptors would be reduced by about 2 A-weighted decibels (dBA). Reduction in noise by 2 dBA would not result in a perceptible difference in noise levels. Construction of the Two-Transformer-Bank Substation Alternative would negligibly reduce noise impacts (Impact NV-4) compared to the impacts of the proposed project."	Rationale: Construction noise is related to the number of equipment, noise emission of each, and distance from the equipment to the receiver. In addition, noise impacts are based upon a daily or hourly value. It is unclear from the analysis if this alternative has less construction equipment on site during the noisiest hour or the noisiest day and if they will actually be 170 feet further away from noise sensitive receptors on Holly Oak Drive. Increasing distance from 1,040 ft to 1,210 ft would result in closer to 1 dBA reduction rather than 2 dBA reduction. SCE recommends the following edits: "Noise from the proposed project may be reduced under the Two-Transformer-Bank Substation Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The Two-Transformer-Bank Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive

Section	Page	DEIR Language	SCE Recommended Language
			receptors on Holly Oak Drive by approximately 170 feet. Thus, noise impacts at these receptors would be reduced by about 1 A-weighted decibels (dBA). Reduction in noise by 1 dBA would not result in a perceptible difference in noise levels. Therefore, this alternative would not reduce noise impacts when compared to the proposed project. ~~Construction of the Two-Transformer-Bank Substation Alternative may negligibly reduce noise impacts (Impact NV-4) compared to the impacts of the proposed project.~~"
5.3.2.3	5-19 Lines 24-25	"The potential for erosion and loss of topsoil during construction of the Gas-Insulated Substation Alternative would be lower than for the proposed project due to reduced ground disturbance."	Rationale: If the same soil types are encountered during ground disturbance, even within a smaller substation footprint, the potential for erosion during each individual ground-disturbing activity would be the same. The potential for soil erosion would decrease only if soils susceptible to erosion are excluded from disturbance based on the alternative footprint of the substation. The reduction of work areas involving ground disturbance does not necessarily lower the overall potential for erosion during construction. The impact level of the alternative as stated in Table 5.3-3 Summary of the Alternatives Analyses and Determinations should be changed to "Similar." SCE recommends the following edits: "The potential for erosion and loss of topsoil during construction of the Gas-Insulated Substation Alternative would be ~~lower~~ similar ~~than for~~ to the proposed project ~~due to reduced ground disturbance~~."
5.3.2.3	5-21 Lines 18-26	"Noise from the proposed project may be reduced under the Gas-Insulated- Substation - Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The Gas-Insulated- Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive receptors on Holly Oak Drive by approximately 190 feet. Thus, noise impacts at these receptors would be reduced by about 2 A-weighted decibels (dBA). Reduction in noise by 2 dBA would not result in a perceptible difference in noise levels. Construction of the Gas-Insulated- Substation - Alternative would negligibly reduce noise impacts (Impact NV-4) compared to the impacts of the proposed project."	Rationale: Construction noise is related to the number of equipment, noise emission of each, and distance from the equipment to the receiver. In addition, noise impacts are based upon a daily or hourly value. It is unclear from the analysis if this alternative has less construction equipment on site during the noisiest hour or the noisiest day and if they will actually be 190 feet further away from noise sensitive receptors on Holly Oak Drive. Increasing distance from 1,040 ft to 1,230 ft would result in closer to 1.5 dBA reduction rather than 2 dBA reduction. It is also unclear if the analysis considers noise related to construction of the surrounding building. SCE recommends the following edits: "Noise from the proposed project may be reduced under the Gas-Insulated- Substation - Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The Gas-Insulated- Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive receptors on Holly Oak Drive by approximately 190 feet. Thus, noise impacts at these receptors would be reduced by about 1.5 A-weighted decibels (dBA). Reduction in noise by 1.5 dBA would not result in a perceptible difference in noise levels. Therefore, this alternative would not reduce noise impacts when compared to the proposed project. ~~Construction of the Gas-Insulated- Substation - Alternative may negligibly reduce noise impacts (Impact NV-4) compared to the impacts of the proposed project.~~"
CUMULATIVE			
6.0	6-14 Line	"…3 features within the proposed project area, approximately 3.7 acres…"	Rationale: Please correct typographical error, consistent with similar comment provided in Bio section.

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
	35		SCE recommends the following edits: "…features within the proposed project area, approximately ~~3.7~~ 0.37 acres waters of the US (USACE / RWQCB) and 2.66 acres jurisdictional streambed and associated riparian habitat (CDFW) may be permanently impacted,"
6.0	6-20 Line 20	"..transformers…"	Rationale: Please correct typographical error. SF6 is not used in transformers, but it is used in circuit breakers. SCE recommends the following edits: "… circuit breakers ~~transformers~~…"
MMRP			
Table 8-1	8-3 to 8-24	Table 8-1 Mitigation Measures	SCE recommends the following edits per Attachment 8.0 MMRP.
8.2	8-25	The following procedure will be observed for dispute resolution: Step 1. Disputes and complaints (including those of the public) should be directed first to the CPUC-designated Project Manager for resolution. The CPUC Project Manager will attempt to resolve the dispute.	Rationale: The way this procedure is written can be confusing and can be interpreted that all complaints (including the public) should first go to the CPUC project manager. SCE recommends the following language that was provided and accepted in the West of Devers Final EIR. SCE recommends the following edits: Step 1. Disputes and complaints (including those of the public) should be directed first to the CPUC-designated Project Manager for resolution. The CPUC Project Manager will attempt to resolve the dispute. If the dispute can be resolved by SCE then the CPUC's Project Manager would direct the person to SCE. If the complaint is received by SCE's Construction Relations Officer, the complaint would be handled by SCE in accordance with Mitigation Measure MM NS-1 (Noise Control Plan).

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
Aesthetics			
MM AES-1: Staging Area Screening. For Staging Yards 1, 2, 6, and 7, the applicant shall at a minimum screen most views of the interiors of these areas using perimeter screening fences or other effective screening. Perimeter screening fences will be a minimum of 6 feet high and covered with a dark-colored (e.g., dark green, brown, or black) fabric or other material that provides at least 50 percent screening and covers the fence exterior.	The CPUC shall verify that SCE installs screening fences at Staging Yards 1, 2, 6, and 7.	During Construction	Staging Yards 1, 2, 6, and 7.
~~**MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions.** Clearing and ground disturbance required for construction, including but not limited to, access roads, pulling sites, construction and maintenance pads, and construction laydown areas, shall be the **minimum** required, and the applicant shall restore all disturbed areas not required for operation and maintenance to pre-construction conditions to the extent feasible. Restoration would not be feasible if, for example, a landowner other than SCE does not wish the area to be restored. Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance shall be regraded and revegetated to be restored to an appearance that would replicate pre-construction conditions. The CPUC shall verify appropriate restoration of disturbed areas. For all paved areas (e.g., streets, sidewalks, and parking areas) disturbed by construction, the applicant shall restore these areas to pre-project conditions in compliance with permits for work within these areas.~~ In the event that the mitigation measure is not removed, please modify language to remove regrading as a requirement. **MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Areas to Pre-Project Conditions.** Clearing and ground disturbance required for construction, including but not limited to, access roads, pulling sites, construction and maintenance pads, and construction laydown areas, shall be the minimum required, and the applicant shall restore all disturbed areas not required for operation and maintenance to pre-construction conditions to the extent feasible. Restoration would not be feasible if, for example, a landowner other than SCE does not wish the area to be restored. Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance shall be ~~regraded and~~ revegetated ~~to be restored~~ to an appearance that would replicate pre-construction conditions. The CPUC shall verify appropriate restoration of disturbed areas. For all paved areas (e.g., streets, sidewalks, and parking areas) disturbed by construction, the applicant shall restore these areas to pre-project conditions in compliance with permits for work within these areas.	The CPUC shall verify whether the restoration of disturbed areas proposed by SCE is to pre-project conditions. For disturbance covered by local permits (e.g., streets, sidewalks, and parking areas), the applicant shall restore these areas to pre-project conditions in compliance with permits for work within these areas.	During Construction – Clearing and ground disturbance shall be the minimum required. Post-construction – Areas that need to be cleared during construction shall be regraded and revegetated.	Any area where clearing and ground disturbance are required.
MM AES-3: Landscape and Aesthetic Treatment along Potrero Grande Drive. Prior to construction, the applicant shall prepare a Landscape and Aesthetic Treatment Plan that will, at a minimum, provide vegetative screening and other aesthetic treatments along Potrero Grande Drive and in the vicinity of the new entry drive at the substation, and provide aesthetic treatment of the operations and test and maintenance buildings and their immediate surroundings. The Landscape and Aesthetic Treatment Plan shall not conflict with NERC CIP requirements in CIP-014-2 (Physical Security) or related NERC findings. Aesthetic treatments along Potrero Grande Drive shall include design enhancements for the masonry screening wall, adjacent walkway, pavement surfaces, and planting areas and may include raised and median planters or other design enhancements. Aesthetic treatment of the operations and test and maintenance buildings and their immediate surroundings shall include improved color selection and design for the buildings and landscaping of their surroundings that will help screen views of the buildings and blend them with their surroundings. All color finishes for built elements shall be flat and non-reflective. The final Landscape and Aesthetic Treatment Plan along Potrero Grande Drive shall be prepared by a professional landscape architect licensed to work in California. The applicant shall consult with the City of Monterey Park in development of the Landscape and Aesthetic Treatment Plan and both this plan and the final designs for the buildings shall be subject to design review and approval by the City. The Landscape and Aesthetic Treatment Plan shall be provided to the CPUC for final review and receive final approval from the CPUC prior to construction of these buildings and aesthetic treatments along Potrero Grande Drive. The final approved Landscape and Aesthetic Treatment Plan shall be fully implemented within four months of beginning operation of the new substation.	The applicant shall consult with the City of Monterey Park in development of the Landscape and Aesthetic Treatment Plan and both this plan and the final designs for the buildings shall be subject to design review and approval by the City. The Landscape and Aesthetic Treatment Plan shall be provided to the CPUC for final review and receive final approval from the CPUC prior to construction of these buildings and aesthetic treatments along Potrero Grande Drive.	Prior to Construction – Prepare a Landscape and Aesthetic Treatment Plan. Post-construction – The Landscape and Aesthetic Treatment Plan shall be implemented within four months of beginning operation of the new substation.	Potrero Grande Drive and in the vicinity of the new entry drive at the substation, and operations and test and maintenance buildings and their immediate surroundings.
MM AES-4: Graffiti Deterrence. Prior to construction, the applicant shall prepare a Graffiti Prevention and Abatement Plan that will, at a minimum, provide measures for the installation of vegetative screening and the removal of graffiti within 48 hours of report or implement other measures to screen or substantially reduce aesthetic impacts associated with graffiti on the new 12-foot-high perimeter wall facing SR 60 along the southeast edge of the proposed Mesa Substation site, such as vegetative screening or other measures intended to fully or mostly screen views from SR 60 of the southeast-facing portion of the wall that is likely to provide a surface that attracts graffiti generally considered unattractive or offensive. The Graffiti Prevention and Abatement Plan shall be provided to the CPUC for final review and approval prior to beginning construction. The final approved Graffiti Prevention and Abatement Plan shall be fully implemented, including installation of all plants for vegetative screening, within four months of beginning operation of the new substation.	The Graffiti Prevention and Abatement Plan shall be provided to the CPUC for final review and approval prior to beginning construction.	Prior to Construction – Prepare a Graffiti Prevention and Abatement Plan. Post-construction – Implement the Graffiti Prevention and Abatement Plan.	The new 12-foot-high perimeter wall facing State Route 60 along the southeast edge of the proposed Mesa Substation site.
"MM AES-5: Glare Reduction. To reduce potential glare from components of the proposed project and help blend them into the landscape setting, the finishes on all new transmission and other structures with metal surfaces shall be non-reflective and new conductors shall be non-specular. ~~With the exception of LSTs, TSPs, and switchracks, all metal structures up to 35 feet high and visible from the vicinity of KOP 7 shall have finishes that are dark in color or otherwise colored to help blend the structures with their surroundings.~~"	CPUC verifies that all new transmission and other structures with metal surfaces installed by SCE be non-reflective and new conductors non- specular.	During Construction	All new transmission and other structures with metal surfaces.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
MM AES-6: Night Lighting. To minimize the effect on any nearby sensitive receptors, night lighting for construction activities, staging areas and other areas used for construction, and nighttime facility operations shall be the minimum necessary to ensure safety and security for nighttime activities and operations. All night lighting used for construction or operations and maintenance shall orient lights downward and be shielded to eliminate off-site light spill at times when the lighting is in use. Lighting at the proposed Mesa Substation shall consist of light-emitting diode lights in all areas where nighttime operations or maintenance activities would occur and be either motion-activated or use timers to the maximum extent feasible to ensure safety and security and reduce the impact of additional light pollution at night.	CPUC verifies that SCE uses the minimum lighting necessary to safety and security for nighttime activities and operations, orients downwards and shields all lighting, and ensures that lighting proposed at the Mesa Substation shall consist of light-emitting diode lights in all areas where operations or maintenance activities would occur.	During Construction	All locations with nighttime lighting.
Air Quality			
APM-AIR-01: Fugitive Dust. During construction, surfaces disturbed by construction activities would be covered or treated with a dust suppressant until completion of activities at each site of disturbance. On-site unpaved roads and off-site unpaved access roads utilized during construction within the proposed project area would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant). On-road vehicle speeds on unpaved roadways would be restricted to 15 miles per hour.	CPUC verifies that SCE applies dust suppressant to surfaces disturbed by construction activities, and all unpaved roads would be stabilized using a water/chemical suppressant**.**	During Construction	Entire project area.
APM-AIR-02: Tier 3 Engines. Off-road diesel construction equipment with a rating between 100 and 750 horsepower (hp) would be required to use engines compliant with EPA Tier 3 non-road engine standards. In the event that a Tier 3 engine is not available, the equipment would be equipped with a Tier 2 engine, and documentation would be provided from a local rental company stating that the rental company does not currently have the required diesel-fueled off-road construction equipment or that the vehicle is specialized and is not available to rent. Similarly, if a Tier 2 engine is not available, that equipment would be equipped with a Tier 1 engine and documentation of unavailability would be provided.	CPUC verifies that all off-road diesel equipment between 100 and 750 horsepower use engines compliant with Tier 3 non-road engine standards. CPUC will verify if a Tier 3 engine is not available per proper documentation, and a Tier 2 or Tier 1 engine must be used.	Prior to and During Construction	Any area where off-road diesel construction equipment is being utilized.
MM AQ-1: Construction Emission Reduction Measures. SCE shall implement the following emission reduction measures for all construction activities: 1. All off-road diesel-powered construction equipment with engines greater than 100 horsepower (hp) shall be compliant with Tier 4 off-road emissions standards where **available**. ~~In the event that equipment with a Tier 4 engine is not available for any off-road engine larger than 100 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 4 emission levels.~~ 2. All off-road **diesel**-powered construction equipment with engines greater than 50 hp shall be compliant with Tier 3 off-road emissions standards where available. ~~In the event that equipment with a Tier 3 engine is not available for any off-road engine larger than 50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 3 emission levels.~~ 3. Equipment with an engine not compliant with the Tier 3 or Tier 4 standards, as applicable, will be allowed on a case-by-case basis only when the applicant has **documented** that no Tier 3 or Tier 4 equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with signed written correspondence by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms representing a good faith effort to locate engines that meet Tier 3 or Tier 4 requirements, as applicable. Documentation will be submitted to CPUC staff for review before equipment is used on the project. 4. Submit to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, best available control technology (BACT) **documentation**, and/or CARB or SCAQMD operating permit, ~~as applicable, at least 15 days~~ prior to mobilization of each applicable unit of equipment."	SCE shall submit to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit, as applicable, at least 15 days prior to mobilization of each applicable unit of equipment.	Prior to and During Construction	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
"MM AQ-2: Volatile Organic Compounds Credits. The remaining emissions of VOC/ROG resulting from construction of the proposed Mesa Substation 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~~ 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 the purchase of up to twice the estimated amount of credit of the required ETC to the SCAQMD prior to the start of construction. ~~The applicant shall also track actual daily ROG emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for ROG emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional ROG credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.~~"	CPUC verifies that SCE has purchased and submitted documentation of the required ETC to the SCAQMD, and that SCE submits the results of a monitoring plan tracking to CPUC staff. If monthly reports indicate that too few credits have been purchased to compensate for ROG emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional ROG credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.	Prior to Construction – Calculate the total amount of VOC/ROG ETCs to be purchased. During Construction – Adhere to monitoring plan and submit reports to CPUC on a monthly basis. Post-construction – Submit proof of the purchase of credits within 7 months of the end of construction.	Entire project area.
"MM AQ-3: Measures to Reduce NOX Emissions. Prior to construction, the applicant ~~and SCE~~ will submit proposed ~~additional~~ measures to reduce daily emissions of NOX to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction. Measures may include the following: 1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NOX emissions requirements if 2010 model year or newer diesel trucks cannot be obtained. ~~2. A requirement that, during project~~ construction~~, all construction equipment shall be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.~~ 2.~~3~~. Other measures as determined appropriate by the applicant ~~and SCE~~ in consultation with the SCAQMD."	Prior to construction, ~~the applicant and~~ SCE will submit proposed additional measures to reduce daily emissions of NO_X to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction.	Prior to Construction – Verify measures have been identified for implementation. During Construction – Implement proposed additional measures.	Entire project area.
"MM AQ-4: Mitigation Agreement for Purchase of Oxides of Nitrogen (NOX) Credits. Twenty days prior to the start of project construction, the applicant shall provide CPUC staff with an estimate of the total construction -related NOX emissions after implementation of all applicable mitigation measures, broken down by individual construction day. All NOX emissions that would exceed the daily threshold of 100 pounds per day shall be offset through the purchase of either Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs. For each day that estimated NOX emissions are less than 100 pounds per day, the purchase of NOX offset credits is not required. The total amount of NOX RTCs and/or MSERCs to be purchased shall be determined by the CPU after the construction schedule and operating conditions are finalized, based on estimates provided by the applicant as described above. The NOX emission credits shall be purchased and submitted to the CPUC prior to the start of project construction. The ERCs purchased will be up to twice the amount estimated to be needed. Credits must be current for the time the project takes place. ~~The applicant shall also track actual daily NOX emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for NOX emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional NOX credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.~~"	Twenty days prior to the start of project construction, the applicant shall provide CPUC staff with an estimate of the total construction-related NO_X emissions. The NO_X emission credits shall be purchased and submitted to CPUC prior to the start of project construction. SCE shall submit results of monitoring plan tracking to CPUC on a monthly basis. The applicant shall submit proof of the additional credits purchased during construction, within 7 months of the end of	Prior to Construction – Provide CPUC staff with estimate of total construction-related NO_X emissions and purchase the credits. During Construction – Implement monitoring plan tracking equipment and vehicle use. If needed, purchase additional credits within 6 months of the end of construction. Post-construction – Submit proof of additional credits purchased during construction within 7 months from the end of construction.	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
Biological Resources			
APM-BIO-01: Special Status Plant Species. During the appropriate phenological periods, formal pre-construction surveys for rare plants would be conducted in areas where special-status plants have the potential to occur within the construction areas. Prior to construction, the locations of special-status plants identified during the surveys would be marked or flagged for avoidance. This boundary would be maintained during work at these locations and would be avoided during all construction activities to the extent possible. Impacts to Nevin's barberry would be avoided. Where disturbance to these areas cannot be avoided, SCE would develop and implement a Revegetation Plan. The Revegetation Plan would include measures for transplanting and replacing special-status plant species that may be impacted by construction of the proposed project. This plan would also include general measures in the event that special-status plant species are encountered prior to construction of the proposed project, as well as post-construction invasive weed management measures, where necessary, to ensure successful revegetation back to pre-construction conditions or to equivalent conditions of representative habitat immediately adjacent to the affected area.	CPUC shall verify pre-construction surveys for rare plants are conducted and the locations of special-status plants have been marked for avoidance. CPUC shall verify that a Revegetation Plan has been developed and implemented.	Prior to Construction – Conduct pre-construction surveys and mark special-status plants. During Construction – Avoidance of Nevin's barberry and special-status plants located during preconstruction surveys. Post-construction – Implement the Revegetation Plan.	All areas that may support special-status plant species.
APM-BIO-02: Revegetation Plan. To the extent feasible, SCE would minimize impacts and permanent loss to riparian habitat, native trees, and other vegetation that is regulated by federal, State, or local agencies, and/or that provides suitable habitat for special-status species. Impacts would be minimized at construction sites by flagging native vegetation to be avoided. If unable to avoid impacts to protected vegetation, a Revegetation Plan would be prepared in coordination with the appropriate agencies for areas of native habitat temporarily and/or permanently impacted during construction. The Revegetation Plan would describe, at a minimum, which vegetation restoration method (e.g., natural revegetation, planting, or reseeding with native seed stock in compliance with the proposed project's Stormwater Pollution Prevention Plan) would be implemented in the proposed project area. The Revegetation Plan would also include the species or habitats that could be impacted, the replacement or restoration ratios (as appropriate), the restoration methods and techniques, and the monitoring periods and success criteria, as identified in each measure.	CPUC shall verify that a Revegetation Plan has been developed and implemented, in coordination with the appropriate agencies.	Prior to Construction – Prepare a Revegetation Plan. Post-construction – Implement the Revegetation Plan.	Entire project area.
APM-BIO-03: Biological Monitoring. To the extent feasible, biological monitors would monitor construction activities in areas with special- status species, native vegetation, wildlife habitat, or unique resources to ensure such resources are avoided.	CPUC verifies that biological monitors are present when construction occurs in areas with special-status species, native vegetation, wildlife habitat, or unique resources.	During Construction	All areas where special-status species, native vegetation, wildlife habitat, or unique resources may occur.
APM-BIO-04: Coastal California Gnatcatcher Protection. A USFWS-approved biologist would conduct pre-construction surveys for coastal California gnatcatcher no more than seven days prior to the start of ground-disturbing activities, if this would commence between February 1 and August 30. Surveys for coastal California gnatcatcher would be conducted in suitable habitat within 500 feet of the proposed project area. If a breeding territory or nest is confirmed, the USFWS would be notified and, in coordination with the USFWS, an exclusionary buffer would be established around the nest. Construction activities in occupied coastal California gnatcatcher habitat would be monitored by a full-time USFWS-approved biologist. Unless otherwise authorized by the USFWS, no proposed activities would occur within the established buffer until it is determined by the biologist that the young have left the nest. Temporary and permanent impacts to coastal California gnatcatcher and their habitat would be mitigated as required by the USFWS.	CPUC verifies that a USFWS-approved biologist conducts pre-construction surveys for the coastal California gnatcatcher within suitable habitat, and construction activities occurring in occupied habitat would be monitored by a full-time USFWS-approved biologist. CPUC also verifies that appropriate mitigation, as required by USFWS, would be implemented in areas of temporary and permanent impacts to the coastal California gnatcatcher and their habitat.	Prior to Construction – Conduct pre-construction surveys. During Construction – Perform construction monitoring.	Suitable habitat within 500 feet of the project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
APM-BIO-05: Least Bell's Vireo Protection. SCE would avoid ground-disturbing activities within suitable habitat for least Bell's vireo during the nesting season to the extent possible. In the event that activities within least Bell's vireo nesting habitat are unavoidable, a USFWS-approved biologist would conduct pre-construction surveys for least Bell's vireo no more than seven days prior to the start of ground-disturbing activities, if this work would commence between March 15 and September 30. Surveys for least Bell's vireo would be conducted in suitable nesting habitat within 500 feet of the proposed project area. If a breeding territory or nest is confirmed, the USFWS and CDFW would be notified and, in coordination with the USFWS and CDFW, an exclusion buffer would be established around the nest. Construction activities in occupied least Bell's vireo habitat would be monitored by a full-time USFWS- and CDFW-approved biologist. Unless otherwise authorized by the USFWS and CDFW, no proposed project activities would occur within the established buffer until it is determined by the biologist that the young have left the nest. Temporary and permanent impacts to least Bell's vireo, and their habitat, would be mitigated as required by the USFWS and CDFW.	CPUC verifies that a USFWS-approved biologist conducts pre-construction surveys for least Bell's vireo within suitable habitat, and construction activities occurring in occupied habitat would be monitored by a full-time USFWS-approved biologist. CPUC also verifies that appropriate mitigation, as required by USFWS, would be implemented in areas of temporary and permanent impacts to least Bell's vireo and their habitat.	Prior to Construction – Conduct pre-construction surveys. During Construction – Perform construction monitoring.	Suitable habitat within 500 of the project area.
APM-BIO-06: Nesting Birds. SCE would conduct pre-construction clearance surveys no more than seven days prior to construction, to determine the location of nesting birds and territories during the nesting bird season (typically February 1 to August 31, earlier for species such as raptors). An avian biologist would establish a buffer area around active nest(s) and would monitor the effects of construction activities to prevent failure of the active nest(s). The buffer would be established based on construction activities, potential noise disturbance levels, and behavior of the species. Monitoring of construction activities that have the potential to affect active nests would continue until the adjacent construction activities are completed or until the nests are no longer active.	CPUC verifies that SCE conducts pre-construction clearance surveys no more than 7 days prior to construction, establishes buffers around active nests, and monitors construction activities around active nests.	Prior to Construction – Conduct pre-construction surveys. During Construction – Perform construction monitoring and establish buffer areas around nests.	Entire project area.
APM-BIO-07: Avian Protection. Electrical facilities would be designed in accordance with Avian Power Line Interaction Committee's *Suggested Practices for Avian Protection on Power Lines: the State of the Art in 2006* (APLIC 2006).	CPUC verifies that SCE has implemented applicable design measures.	Prior to Construction	Power line components.
APM-BIO-08: Compensation for Permanent Impacts. Permanent impacts to all jurisdictional water resources would be compensated at a 1- to-1 ratio, or as required by the USACE, CDFW, and RWQCB.	CPUC verifies that SCE consults with the appropriate agency (USACE, CDFW, or RWQCB) and mitigates all permanent impacts to jurisdictional waters.	Post-Construction	All areas where permanent impacts to jurisdictional waters occurs.
MM BR-1: Pre-construction Surveys. Prior to construction and activities that may include vegetation clearing, staging, and stockpiling, or other activities with the potential to directly or indirectly affect wildlife, the applicant shall retain a qualified biologist approved by the CPUC to conduct pre-construction surveys for sensitive biological resources, including special-status plant species and special-status wildlife, and nesting birds in all areas of temporary and permanent disturbance. Preconstruction surveys shall be species and resource appropriate and typically conducted a maximum of 14 days prior to construction <u>during the nesting bird season (February 1-August 31) and a maximum of 30 days prior to construction outside the nesting season (September 1-January 31)</u>, as approved by the CPUC; nesting bird and burrowing owl pre-construction surveys shall be consistent with the timing specified in the Nesting Bird Management Plan required by MM BR-11. The information gathered from these surveys shall be used to develop site- and resource- specific actions to minimize impacts on sensitive resources from project-related activities. Additionally, a CPUC-approved qualified biologist shall conduct pre-construction clearance sweeps for special-status species at all access, staging, and laydown/work areas where suitable habitat is present within approximately 24 hours of construction activities each day.	CPUC verifies that pre-construction surveys are completed.	Prior to Construction	All areas of temporary and permanent disturbance.
MM BR-2: Limits of Construction Activities: Project Boundaries and Sensitive Areas Clearly Marked. In all locations of the project, construction activities, vehicular traffic (including movement of all equipment), and storage of construction materials shall be restricted to approved access roads and established construction areas indicated by flagging~~, fencing,~~ and/or signage. ~~The applicant shall ensure that exclusionary fencing is installed prior to the start of construction activities around laydown and work and staging areas, where necessary, to prevent inadvertent encroachment into the habitat adjacent to areas of impact.~~ Identified sensitive resources such as aquatic features, special- status plants and natural communities, and known wildlife habitat of special-status species (e.g., nests, burrows, or dens) shall be assigned a buffer as appropriate and clearly marked (e.g., with signs, flagging, ropes, and/or fencing) to ensure they are avoided unless disturbance was previously approved. A CPUC-approved qualified biologist shall determine the appropriate buffer depending on the species and the construction activity. The CPUC-approved qualified biologist shall perform or supervise flagging and fencing to ensure that these activities are conducted without harm to sensitive species or habitat. If special-status wildlife, or evidence of special-status wildlife or special-status plant species not previously analyzed in this document, is found at any time, the applicant shall immediately halt work and contact the appropriate wildlife agency(ies) and the CPUC. Work will resume once the CPUC provides approval.	CPUC verifies that construction activities are limited to approved work areas and access roads, and are indicated with flagging, fencing, and/or signage.	Prior to Construction	All locations of the project, construction activities, vehicular traffic, and storage of construction materials.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
MM BR-3: Habitat Restoration and Mitigation. Prior to construction of the proposed project the applicant shall ensure that seasonally- appropriate surveys of vegetation are completed by a qualified botanist familiar with these vegetation associations. SCE shall develop a Habitat Restoration and Mitigation Plan that shall include an estimate of the total area of sensitive natural communities, including all coastal California gnatcatcher habitat and riparian habitat. With the consultation and review of the USFWS, CDFW, and CPUC, SCE shall prepare the plan to ensure restoration of all temporary impact areas and to ensure mitigation for permanent impacts on sensitive natural communities and coastal California gnatcatcher habitat. The plan must be submitted 60 days prior to the planned start of construction. CPUC approval is required before the plan is implemented. Required plan details include but are not limited to: • All temporarily impacted areas shall be restored. All temporary disturbances to sensitive natural communities shall be restored with the pre-disturbance natural community. ~~All other temporarily impacted areas shall be restored with coastal sage scrub if feasible and appropriate.~~ Areas that do not provide habitat to coastal California gnatcatcher, other special-status species, or sensitive resources may be restored to the conditions agreed upon between the landowner and the applicant. • The restoration plan shall specify how each type of vegetation community, including sensitive natural communities, shall be addressed in terms of the following restoration details: topsoil segregation and conservation; vegetation treatment and removal; revegetation methods, including seed mixes, rates, and transplants; criteria to monitor and evaluate revegetation success (minimum of 4 years of monitoring and achieving establishment of 70~~80~~% relative cover for sensitive natural communities); and compensation and remedial measures to be implemented as needed.. • For sensitive natural communities, mitigation of permanent impacts shall occur after construction at a level of 1:1. In addition, permanent disturbances to coastal California gnatcatcher habitat that is not coastal sage scrub or another sensitive natural community shall be mitigated at a 1:~~1~~0.5 ratio. Mitigation for permanent impacts shall be completed through one of the following methods: 1. Establishing the natural community with similar quality and conditions that currently exist within the proposed project areas (onsite); 2. Establishing the natural community with similar quality and conditions that currently exist outside the proposed project areas (within one mile of the project area); 3. If Options 1 and 2 are not feasible, SCE shall purchase credits and/or mitigation lands at a ratio of 2:1 from an entity approved by CDFW and USFWS, as appropriate. For Options 1 and 2 (onsite and offsite), the plan shall specify restoration details, including that post-construction monitoring shall be performed for a minimum of four years, a success criteria of restoring native vegetation to the same pre-existing conditions, achieving establishment of 70 ~~80%~~ relative cover. ~~shall be met, and r~~ Remedial measures shall be implemented if success criteria are not met.". • Impacts on areas that were previously restored for SCE's TRTP shall be avoided if possible. The plan shall identify any impacts on areas that were previously restored for TRTP and provide detailed restoration plans for these areas. Restoration in these areas shall follow restoration criteria that are consistent with the goals and criteria of TRTP restoration, per TRTP Mitigation Measure B-1a: Provide restoration/compensation for impacts to native vegetation communities. With CPUC approval, requirements described in this mitigation measure and the Habitat Restoration and Mitigation Plan may be satisfied through compliance with permit conditions, if these requirements are equally or more effective. SCE shall also minimize the removal of coastal sage scrub or other suitable coastal California gnatcatcher habitat, particularly within designated critical habitat for the coastal California gnatcatcher. ~~To minimize the removal of vegetation in habitat areas of the coastal California gnatcatcher,~~ SCE shall ensure that trimming of all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher is monitored by a qualified biologist approved by the CPUC. Trimming of native trees and native arborescent shrubs shall be completed outside of the nesting bird season ~~and shall be monitored by a qualified biologist.~~	The plan must be submitted 60 days prior to the planned start of construction. CPUC approval is required before the plan is implemented. CPUC shall verify that USFWS, U.S. Army Corps of Engineers, and CDFW have reviewed the plan. With CPUC approval, requirements described in this mitigation measure and the Habitat Restoration and Mitigation Plan may be satisfied through compliance with permit conditions, as approved by the regulating agency. ~~if these requirements are equally or more effective.~~	Prior to Construction – Ensure seasonally appropriate surveys of vegetation are completed and a Habitat Restoration and Mitigation Plan is prepared. During Construction - Minimize the removal of coastal sage scrub or other suitable coastal California gnatcatcher habitat. Post-construction – Restore all temporarily impacted areas and mitigate for permanent impacts on sensitive natural communities and coastal California gnatcatcher habitat.	Entire project area.
MM BR-4: Noxious and Invasive Weed Control Plan. Prior to construction, the applicant shall submit a Noxious and Invasive Weed Control Plan that shall be implemented before, during, and after construction, including during the project restoration phase. This plan shall include measures designed to avoid the introduction and spread of noxious weeds and invasive plant species designated by the state, the counties, and local weed control boards. This plan shall be developed as required by agency permits and in consultation with ~~CDFW and~~ CPUC and shall be provided to these agencies for review and comment. The plan must be submitted to the CPUC 60 days prior to the planned start of construction. CPUC approval is required before the plan is implemented. At a minimum, this plan shall include the following measures:	This plan shall be developed in consultation with CDFW and CPUC and shall be provided to these agencies for review and comment. The plan must be submitted to the CPUC 60 days prior to the planned start of construction. CPUC approval is	Prior to Construction – Prepare and submit a Noxious and Invasive Weed Control Plan and perform pre-construction surveys for special-status plant species. During Construction – Implement	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
• Pre-construction surveys for special-status plant species (APM BIO-01 and MM BR-1) shall include surveys for state-,county-, and locally-designated noxious weed species. The applicant shall coordinate with the appropriate agencies, including the CPUC, to determine appropriate species-specific measures to implement, or whether control or treatment of a species is feasible and preferable. • All vehicles and equipment shall be clean and free of dirt, mud, and any debris that may carry invasive plant seeds or parts prior to arrival at the project location, including prior to use of access roads. • ~~Vehicle and equipment wash stations (mobile or built in place) shall be erected at strategic locations on the ROW where designated weed species have been detected, and where doing so would help prevent the spread of these species.~~ • Straw, hay, gravel, soil, or other construction or erosion control materials that could inadvertently contain unwanted plant propagules shall come from state-cleared sources that are free of invasive weeds. • All seeds to be used in revegetation and reclamation activities shall come from weed-free sources. • All temporary disturbance areas that will be restored to pre-construction condition during post-construction shall be monitored for ~~invasive species~~ establishment of new invasive species on a monthly basis~~-~~during the growing season and on a quarterly basis outside of the growing season ~~basis~~ for at least one year after project restoration is completed. If evidence of the expansion or increase in abundance of a known invasive species or introduction of a new invasive species is found, the applicant shall initiate appropriate control measures, which may include mowing or trimming of weeds prior to seed set, as outlined in the plan.	required before the plan is implemented.	the Noxious and Invasive Weed Control Plan. Post-construction – Monitor of all restored work areas for the presence of invasive weeds.	
MM BR-5: Worker Environmental Awareness Program. The applicant shall develop and implement a WEAP for all project personnel. The program must be submitted to the CPUC at least 30 days prior to the start of construction for review. CPUC approval is required before the program is implemented. All project personnel shall undergo training prior to entering the ROW. The training shall include a description of the species of concern and their habitats, the general provisions of applicable environmental regulations, the need to adhere to the provisions of the regulations, the penalties associated with violating the provisions of the regulations, the general measures that are being implemented to conserve the species of concern as they relate to the project, the access routes to the project, and project boundaries within which the project- related activities must be accomplished. This training shall include a detailed review of how project personnel can identify sensitive biological resources in the project area which need to be avoided or where work activities will be restricted.	SCE shall submit sign-in sheets for those who attended WEAP training.	Prior to Construction – Submit WEAP During Construction – Submit sign-in sheets monthly	Entire project area.
MM BR-6: Avoidance of Nevin's barberry. The project shall be designed to avoid impacts on occurrences of Nevin's barberry during construction and operation and maintenance. Prior to the start of construction, the applicant's CPUC-approved qualified ~~biologist~~ botanist shall flag ~~complete pre-construction surveys in suitable habitat during the appropriate blooming period to identify any~~ occurrences previously identified by protocol plant surveys. Unless otherwise specified by the USFWS, where Nevin's barberry occurs, all ground disturbing or pole maintenance work during construction and operation and maintenance activities shall occur outside a restrictive buffer ~~of 25 feet; however, trucks may drive past the individuals wherever existing access roads have already been established farther than 15 feet away from a given plant,. Vehicles and crew members shall be prohibited from coming within 200 feet of identified Nevin's barberry unless a buffer reduction is approved by the CPUC~~ as determined after consultation with USFWS. A reduced buffer shall be a minimum of 25 feet or greater from a Nevin's barberry plant. A qualified botanist ~~biologist~~ approved by the CPUC shall monitor crew members and the Nevin's barberry to ensure all project activities comply with the USFWS requirements established through consultation ~~stay away from Nevin's barberry within the buffer~~. The ~~biologist~~ botanist shall have the authority to halt work if it is determined that Nevin's barberry could be impacted. In the event that previously unknown occurrences of Nevin's barberry are discovered during pre-construction surveys or during construction or operations, a 200-foot buffer shall be established and the USFWS and CPUC shall be contacted within 24 hours.	SCE shall submit preconstruction survey results to the CPUC, report any previously unknown occurrences found during pre-construction surveys or construction, and submit a monitoring report.	Prior to Construction – Conduct pre-construction surveys in suitable habitat to identify any occurrences and establish a buffer around any occurrences. During Construction – Monitor construction around buffers.	Areas of suitable habitat for Nevin's barberry and around known occurrences.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
~~**MM BR-7: Restoration of Southern California Black Walnut.** SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of final engineering design of project features), black walnut tree evaluation surveys shall be completed by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist must be approved by the CPUC. The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots.~~ ~~California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 3:1 ratio. If the diameter at breast height of the tree to be removed is 24 inches or less, it shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established.~~ ~~Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC, and in consultation with USFWS and CDFW. Replacement trees shall be planted before tree removal, or if not feasible or if potentially harmful to the replacement trees, as soon as possible after removal.~~ If CPUC dismisses SCE's recommendation to merge MM BR-7 in to MM BR-8, please consider the following recommendations: MM BR-7: Restoration of Southern California Black Walnut. SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees or purchase credits at a mitigation bank for any impacted or removed specimens. Prior to construction (after completion of final engineering design of project features), black walnut tree evaluation surveys shall be completed by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist must be approved by the CPUC. The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots. California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a ~~3:1~~2:1 ratio. If the diameter at breast height of the tree to be removed is 24 inches or less, it shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established. Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC ~~and in consultation with USFWS and CDFW~~. Replacement trees shall be planted before tree removal, or if not feasible or if potentially harmful to the replacement trees, as soon as possible after removal.	CPUC shall approve a detailed plan for restoration, including identification of planting location, in consultation with USFWS and CDFW.	Prior to Construction – Complete black walnut tree evaluation surveys. During Construction – Monitor construction activities that take place within the driplines of black walnut trees. Post-construction – Replace those black walnut trees impacted or removed by construction activities.	All project locations where black walnut trees occur.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
MM BR-8: Restoration of Special-status Plants. The applicant shall complete pre-construction surveys during the appropriate blooming period to identify special-status plants, including Plummer's mariposa lily, intermediate mariposa lily, and Southern California tarplant populations in the proposed project component areas where suitable habitat is present. ~~Special-status plants shall be identified by~~ If pre-construction surveys find special-status plants, ~~a qualified biologist and~~ they will be flagged or surrounded with fencing in such a way that disturbance of the populations or individuals shall be avoided. In the event that populations or individuals cannot be avoided, the applicant shall develop and implement a restoration plan for each plant, which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. CPUC approval is required before the plan is implemented. Additionally, SCE will coordinate with MWD with respect to planting locations to ensure there is no effect on MWD O&M activities with regards to the relocated Middle Feeder. In addition, SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of final engineering design of project features), black walnut trees identified in the impact area will be evaluated by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots. California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 2:1 ratio. Tree removal shall not be permitted until a detailed plan for restoration, is approved by the CPUC. For temporary impacts to special-status plants, restoration shall occur after construction and to an extent such that "no net loss" is ensured for all special-status plants in the proposed project component areas. The number of plants at seven years will be equal to or greater than the number destroyed. Mitigation for permanent impacts shall be completed by: 1. Establishing individual plants within the proposed project areas (onsite); 2. Establishing individual plants outside the project areas (offsite); or 3. Purchase of credits and/or mitigation lands at a ratio of 2:1 from an entity approved by CDFW. For Options 1 and 2 (establishing plants onsite or offsite), the plan shall include the following elements: planting/seeding palettes; monitoring and contingency program monitoring schedule, including duration (seven years) and performance criteria (no net loss); and any specific measures that will be required to ensure success of the restoration effort. Also for Options 1 and 2, removed walnut trees that have 24 inches or less diameter at breast height shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established. For option 1, the replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area.	CPUC shall verify that pre-construction surveys occur during the appropriate blooming period and that any special – status plants are flagged or fenced for avoidance. In the event that populations or individuals cannot be avoided, the applicant shall develop and implement a restoration plan for each plant, which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. CPUC approval is required before the plan is implemented.	Prior to Construction – Conduct pre-construction surveys. Develop restoration for each special-status plant that cannot be avoided.	All project areas where suitable habitat is present for Plummer's mariposa lily, intermediate mariposa lily, and Southern California tarplant.
MM BR-9: Construction Monitoring. The applicant shall ensure that a qualified biologist approved by the CPUC serves as a construction monitor during periods when construction activities occur near active nest areas, or within 100 feet of native vegetation or vegetation that has the potential, or is known, to provide habitat for special-status species. The monitor shall have the authority to temporarily stop work that they determine threatens a special-status species or sensitive resource. The monitor shall determine what appropriate action to take, and work will resume once the monitor determines there is no longer a threat to the special-status species or sensitive resource, or consultation has occurred with the appropriate wildlife agencies which determines appropriate steps have been taken and a threat is no longer present.	CPUC shall verify that a CPUC-approved biologist is present during construction activities occurring near active nest areas, or within 100 feet of native vegetation or vegetation that has the potential, or is known, to provide habitat for special-status species.	During Construction	All project areas near active nest areas, or within 100 feet of native vegetation or vegetation that has the potential, or is known, to provide habitat for special-status species.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
MM BR-10: Open Trenches. To prevent entrapment of wildlife, SCE shall ensure that all steep-walled trenches, auger holes, or other excavations are covered at the end of each day or completely fenced off at night in such a way that wildlife cannot become entrapped. For open trenches only, these may instead have wildlife escape ramps within the trench maintained at intervals of no greater than 100 feet. These ramps shall have a maximum slope not to exceed 2:1. SCE's biological monitor, approved by the CPUC, shall inspect all trenches, auger holes, or other excavations a minimum of three times per day and immediately prior to backfilling. All non-special-status wildlife species found will be safely removed and relocated out of harm's way, through the use of suitable tools such as a pool net when applicable. For safety reasons, under no circumstance will biological monitors enter open excavations.	CPUC shall verify that all steep-walled trenches, auger holes, or other excavations are covered at the end of each day or completely fenced off at night in such a way that wildlife cannot become entrapped. Escape ramps are acceptable for open trenches only.	During Construction	All project areas containing steep-walled trenches, auger holes, or other excavations.
MM BR-11: Nesting Bird Management Plan. To address potential conflicts between construction activities and the activities of nesting birds in the project component areas, SCE shall develop a nesting bird management plan in consultation with USFWS, CDFW, and CPUC, and shall submit the final plan to the CPUC no less than 60 days prior to construction. CPUC approval is required before the plan is implemented. The nesting bird management plan shall include measures and an adaptive management program to avoid and minimize impacts to special-status <u>species not listed pursuant to the ESA or CESA</u> and MBTA-California Fish and Game Code-protected bird species during nesting periods during project construction. Specifically, the nesting bird management plans shall contain: • Appropriate survey timing, extents, methods, and surveyor qualifications; approved nest deterrent methods, including areas where vegetation will be cleared for the purpose of deterring nesting; monitoring and reporting protocols during construction; protocol for determining whether a nest is active; protocol for documenting, reporting, and protecting active nests within construction areas. If pre-construction survey protocols exist for a certain species, the plan shall <u>reference</u> ~~outline~~ the implementation of these protocols • Guidelines for determining appropriate and effective buffer distances that will account for specific project settings, bird species, stage of nesting cycle, and construction work type. Language for buffer reduction process will be included in the plan, which shall include coordination with the appropriate wildlife agencies and the CPUC if reducing the buffer of a ~~raptor or~~ special-status species. • Language specifying that the determination of appropriate and effective buffers between construction activities and identified nests shall be site- and species/guild-specific and data-driven, and will not be based on generalized assumptions regarding all nesting birds. • Language specifying that determinations of appropriate and effective buffers between construction activities and identified nests can be made in the project construction area by the CPUC-approved biological monitor (qualified in accordance with nesting bird plan standards, which will include specific requirements for ~~education and experience in~~ conducting biological surveys and with specific birds in the project area). • Vertical buffers shall be put in place in those areas where helicopters will be used, and they will be based on anticipated effects of rotor wash and noise for the class of helicopter being used by SCE. Surveys and monitoring of the active buffer areas will be performed by a CPUC-approved biologist before, during, and after helicopter use in the vicinity of active buffers. • Burrowing owl pre-construction surveys shall adhere to the current burrowing owl survey protocol identified by CDFW (i.e., CDFW's Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If pre-construction burrowing owl surveys confirm the presence of burrowing owl, SCE shall submit a Burrowing Owl Compensation Plan, in consultation with CDFW and the CPUC, which is consistent with mitigation guidelines in the Staff Report, prior to construction. The final Burrowing Owl Compensation Plan shall be implemented, as specified, throughout construction and restoration. The plan shall describe the compensatory measures that will be undertaken to address the loss of burrowing owl burrows within the project area. This will include mitigation for permanent impacts on nesting, occupied, and satellite burrows and occupied burrowing owl habitat with (a) permanent conservation of similar vegetation communities comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals. SCE shall notify CDFW, USFWS, and the CPUC of all project-related bird injuries or mortalities within 12 hours of discovery and will follow the agencies' recommended actions, if any. Reporting of nesting bird activities, buffer reductions, and monitoring results shall be provided to the USFWS, CDFW, and the CPUC on a regular basis.	SCE shall develop a Nesting Bird Management Plan in consultation with USFWS, CDFW, and CPUC, and shall submit the final plan to the CPUC no less than 60 days prior to construction. CPUC approval is required before the plan is implemented. Reporting of nesting bird activities, buffer reductions, and monitoring results shall be provided to the USFWS, CDFW, and the CPUC on a regular basis.	Prior to Construction – Conduct surveys during the appropriate nesting season. During Construction – Perform monitoring and prepare reports.	All work areas in which any construction related activities are conducted.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
MM BR-12: Gnatcatcher Surveys. Prior to the start of construction, SCE shall ensure that protocol-level pre-construction surveys are conducted by a qualified biologist approved by the CPUC for the coastal California gnatcatcher in project component areas where suitable habitat exists in accordance with the Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Guidelines (USFWS 1997). In the event that coastal California gnatcatchers are observed during pre-construction surveys, a qualified biologist must identify the boundaries of the pair's territory and SCE must not conduct construction activities within 500 feet of the territory, or as otherwise approved by the USFWS~~CPUC~~, with documentation of the~~in~~ consultation with USFWS provided to the CPUC ~~and CDFW~~. SCE shall notify USFWS and CDFW in the event gnatcatcher territory or nest sites are confirmed by surveys, immediately upon return from the field. If infeasible to maintain a buffer of 500 feet (or a distance otherwise approved by USFWS ~~and CDFW~~), by installing temporary flagging or fencing, from an active gnatcatcher territory, construction activities within or near these areas will be performed outside the breeding and nesting season (coastal California gnatcatcher breeding/nesting season is approximately February 1 through August 30)."SCE may conduct construction activities in gnatcatcher habitat during the breeding and nesting season if protocol-level surveys (conducted within one year prior to construction activities per protocol) confirm the absence of breeding gnatcatchers, or if the 500-foot protective buffer from all active gnatcatcher territories can be maintained.	CPUC shall ensure that protocol-level surveys are conducted.	Prior to Construction – Conduct protocol-level surveys. During Construction – Perform monitoring and prepare monitoring reports.	All work areas where suitable coastal California gnatcatcher habitat exists.
MM BR-13: Pre-Construction Surveys for Least Bell's Vireo. Prior to construction and within their breeding season (generally April 1-August 31), SCE shall complete protocol-level surveys for least Bell's vireo in native riparian ~~areas~~ habitat ~~of suitable or potentially suitable habitat~~ within the proposed component areas, unless otherwise agreed upon by USFWS and CDFW. Surveys will be conducted by a qualified biologist approved by the CPUC according to the survey protocol for least Bell's vireo (USFWS 2001). In the event that least Bell's vireo territory or nest sites are confirmed, SCE shall notify the USFWS and CDFW ~~immediately~~ within 48 hours upon return from the field. If individuals or their nests are observed, biologists will establish and maintain a minimum 500-foot (or a distance otherwise approved buffer from USFWS and CDFW) exclusionary buffer by installing temporary flagging or fencing between the nest territory and construction activities. If infeasible to maintain a buffer of 500 feet (or a distance otherwise approved by USFWS and CDFW), from an active vireo territory, construction activities within or near these areas will be performed outside the breeding and nesting season.	CPUC shall ensure that protocol-level surveys are conducted.	Prior to Construction – Conduct protocol-level surveys during LBVI activity periods. During Construction – Perform monitoring and prepare monitoring reports if work conducted near LBVI habitat during the breeding season.	All work areas where suitable least Bell's vireo habitat exists.
MM BR-14: Minimize Impact on Riparian Habitat and Aquatic Features. SCE shall complete the following: ~~1. In those areas where riparian vegetation is required to be removed, SCE shall work with a qualified botanist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ.~~ 2. Temporary impacts to riparian habitat or aquatic features shall be fully restored according to the Habitat Restoration and Mitigation Plan described in MM BR-3. All permanently impacted areas shall be mitigated using methods described in MM BR-3. 3. Where riparian vegetation or aquatic features would be impacted by project construction activities, SCE shall also consult with USACE, RWQCB, and CDFW to determine if a CWA Section 404 permit, CWA Section 401 permit, and LSAA pursuant to California Fish and Game Code Section 1600 would be necessary, respectively. If USACE, RWQCB, or CDFW determines a permit is required, the permit will be obtained prior to impacts and SCE will comply with all terms and conditions of the agreement. In addition, the USACE, RWQCB, and CDFW shall be provided the opportunity to review and comment on the Habitat Restoration and Mitigation Plan if impacts will occur in an area that may be under their jurisdiction. 4. Mitigation requirements described under number 2 above for impacts to riparian habitat or aquatic features may be satisfied by demonstrating compliance with equal or more effective permit conditions, with approval by the CPUC.	CPUC verifies that a qualified botanist has been consulted to determine the minimum amount of vegetation to be removed, temporary impacts are restored according to the Habitat Restoration and Monitoring Plan, and permanent impacts are mitigated according to methods described in MM BR-3. CPUC may also determine that the above mitigation requirements are satisfied by compliance with permit conditions. CPUC also verifies that USACE, RWQCB, and CDFW are consulted to determine if a permit is ~~necessary.~~	Prior to Construction – Consult with botanist to determine appropriate amount of vegetation removal. Post-Construction – Restore and/or mitigate temporary and permanent impacts.	All project areas containing riparian habitat and aquatic features.
MM BR-15: Avian Protection Plan. SCE shall adhere to recommendations published by APLIC (Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012). In addition SCE shall develop and implement an Avian Protection Plan according to Avian Protection Plan Guidelines (APLIC and USFWS 2005). SCE will implement and provide the CPUC with the USFWS approved company-wide APP. ~~The plan shall include provisions to reduce impacts on avian species during operation of the proposed project, and shall provide for the adaptive management of project-related issues. The plan shall be submitted for review to CDFW, USFWS, and the CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented.~~"	~~The plan shall be submitted for review to the CDFW, USFWS, and CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented.~~	~~Prior to Construction – Develop an Avian Protection Plan.~~ During Construction – Implement the Avian Protection Plan.	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
Cultural and Paleontological Resources			
APM-CUL-01: Paleontological Resources Management Plan. A Paleontological Resources Management Plan would be developed for construction within areas that have been identified as having a moderate and high sensitivity for paleontological resources. The Paleontological Resources Management Plan would be prepared by a professional paleontologist in accordance with the recommendations of the Society of Vertebrate Paleontology.	CPUC verifies a Paleontological Resources Management Plan is developed by a professional paleontologist.	Prior to Construction – Develop a Paleontological Resources Management Plan. During Construction. Implement the Paleontological Resources Management Plan.	Project areas that have been identified as having a moderate or high sensitivity for paleontological resources.
MM CR-1: Flag and Avoid Known Unevaluated Historic Sites. Prior to commencement of any construction or construction-related activities within ~~50~~ 10 feet of the mapped boundaries of (1) the historic-era debris and concrete structure at site P-19-186889 and (2) the concrete footings and shack at site SAY-S-1, a qualified CPUC-approved archaeologist shall erect flagging to create a ~~50~~10-foot buffer around these resources. Flagging shall be in a bright, easily visible color, and signs shall be posted at the perimeter of the flagged areas on all sides to indicate that construction equipment, materials, and personnel shall stay out of the flagged areas. Flagging and signage shall stay in place until all construction activities within ~~50~~ 10 feet of the resources has been completed. If the historic-era debris and concrete structure at site P-19-186889 are evaluated and found not to be a historical resource or not contribute to the eligibility of a historical resource, no further management is required during construction. If the concrete footings and shack at site SAY-S-1 are evaluated and found not to be a historical resource or not contribute to the eligibility of a historical resource, no further management is required during construction.	CPUC verifies an archaeologist has erected flagging at appropriate locations.	Prior to Construction	All project areas where construction activities are occurring within ~~50~~ 10 feet of the mapped boundaries of (1) the historic-era debris and concrete structure at site P-19-186889 and (2) the concrete footings and shack at site SAY-S-1.
MM CR-2: Worker Training for Cultural and Paleontological Resources. Prior to commencement of any project-related construction activities, all SCE, contractor, and subcontractor project personnel shall receive training regarding: • Appropriate work practices necessary to effectively implement the APMs and mitigation measures and to comply with the applicable environmental laws and regulations. • The potential for exposing subsurface cultural resources and paleontological resources . • How to recognize possible buried resources. This training shall include a presentation of: • Procedures to be followed upon discovery or suspected discovery of historic or archaeological materials, including Native American remains and their treatment. • Procedures to be followed upon discovery or suspected discovery of paleontological resources. • Actions that may be taken in the case of violation of applicable laws.	CPUC verifies all SCE, contractor, and subcontractor project personnel have received worker training for cultural and paleontological resources.	Prior to Construction	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
MM CR-3: Previously Unidentified Cultural Resources. If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an "environmentally sensitive area." Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/~~archaeologist~~ qualified archaeologist, SCE, and the CPUC shall be notified immediately." Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist and SCE determine~~s~~ that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist and SCE shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center." • **Determination if a resource is an historical resource.** The CPUC-approved cultural resources specialist/qualified archaeologist and SCE, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historical resource, the qualified archaeologist and SCE 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 historical 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 shall 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 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. • **Data Recovery Plan.** Data Recovery Plans for 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 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 curation facility shall meet the requirements of 36 Code of Federal Regulations 79. The Data Recovery Report shall be submitted to the CPUC for review and approval. Once approved, the Data	CPUC verifies that work has been halted and that protective barriers have been installed. CPUC verifies that a Data Recovery Field Memo is prepared and a Data Recovery Report is prepared and submitted to CPUC for review and approval. CPUC shall also verify that all impacted known resources and all unanticipated resources shall be recorded on DPR 523 forms that shall be filed at the Eastern Information Center with the Data Recovery Report. If an Evaluation Plan is needed, CPUC shall verify it has been prepared with appropriate measures.	During Construction	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
MM CR-4: Paleontological Resources Monitoring. Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor ~~all~~ ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources, per the Paleontological Resources Management Plan (APM-CUL-01) reviewed and approved by the CPUC prior to of construction. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-~~7~~5.".	SCE shall retain a qualified paleontologist, approved by the CPUC.	During Construction	Construction areas with a moderate to high potential to contain paleontological resources.
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 consult with the applicant to determine whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, 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, 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). Substantiation of the uniqueness conclusion shall be provided to the CPUC for review and approval. If the resource is determined not to be unique, work may commence in the area. If the resource is unique, then work shall remain stopped, and the approved paleontologist shall consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved ~~cultural resources specialist/qualified archeologist~~ paleontologist in consultation with the applicant determines that another method would provide superior mitigation of impacts to the resource. Other methods include ensuring that the fossils are recovered, prepared, identified, catalogued, and analyzed according to current professional standards under the direction of a qualified paleontologist. 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*	CPUC verifies that the Paleontological Resource Discovery Protocol is followed, including CPUC review and approval of the uniqueness conclusion for the resource and the methods for recovery of the resource.	During Construction	Entire project area.
MM CR-6: Unanticipated Discovery of Human Remains. In the event that human remains or suspected human remains are identified, SCE shall comply with California law, including, but not limited to, the following provisions: 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 area where the remains are identified shall be flagged off, and all construction activities within 165 feet (50 meters) of the find shall immediately cease. The CPUC, the CPUC-approved cultural resources specialist/archaeologist, SCE, and any other appropriate agency shall be immediately notified, and the cultural resources specialist/archaeologist shall examine the find. If the cultural resources specialist/archaeologist determines that there may be human remains, SCE shall immediately contact the Medical Examiner at the Los Angeles County Coroner's office. The Medical Examiner has two working days to examine the remains after being notified by SCE. If the Medical Examiner believes the remains are Native American, he/she shall notify the NAHC within 24 hours. The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the remains, and the MLD has 48 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the human remains and any associated grave goods. If the MLD does not make recommendations within 48 hours, the area of the property shall be secured from further disturbance. If there are disputes between the landowners and the MLD, the NAHC shall mediate the dispute and attempt to find a solution. If the mediation fails to provide measures acceptable to the landowner, the landowner or their representative shall reinter the remains and associated grave goods and funerary objects in an area of the property secure from further disturbance. The location of any reburial of Native American human remains shall not be disclosed to the public and shall not be governed by public disclosure requirements of the California Public Records Act, California Government Code § 6250 et seq., unless otherwise required by law. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r).	In the event that human remains are identified, the CPUC, the CPUC-approved cultural resources specialist/archaeologist, SCE, and any other appropriate agency shall be immediately notified. CPUC shall verify that SCE immediately contacts the medical examiner at the Los Angeles County Coroner's Office.	During Construction	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
Geology, Soils, and Minerals			
MM GEO-1: Geotechnical Investigation. The applicant will conduct a geotechnical investigation for the proposed project and prepare a geotechnical report documenting the results of the investigation. The geotechnical investigation shall assess the potential for liquefaction, landslides, lateral spreading, seismic ground shaking, and expansive soil. The geotechnical report shall make recommendations of engineering and design measures to incorporate into the proposed project, determined appropriate by a California-licensed Geotechnical Engineer or Certified Engineering Geologist, to mitigate impacts associated with liquefaction, landslides, lateral spreading, seismic ground shaking, and expansive soils. Measures that may be used to minimize impacts could include, but are not limited to: • *Liquefaction:* stabilization of fills, retaining walls, slope coverings, removal of unstable materials, avoidance of highly unstable areas, construction of pile foundations, and/or ground improvements of liquefiable zones. • *Landslides and lateral spreading:* retaining walls, excavation of unstable materials, avoidance of highly unstable areas. • *Seismic ground shaking:* energy dissipating devices, bracing, bolting of foundations. • *Expansive soil:* excavation of expansive soil, draining water away from expansive soils, ground-treatment processes. SCE shall provide documentation to the CPUC prior to construction that demonstrates these measures have been incorporated into project design.	SCE shall provide documentation to the CPUC prior to construction that demonstrates these measures have been incorporated into project design.	Prior to Construction	Entire project area.
Hazards and Hazardous Materials			
~~**MM HZ-1: Hazardous Materials Business Plan.** A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on:~~ ~~• Hazardous materials stored at the Mesa Substation over threshold quantities.~~ ~~• A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points.~~ ~~• Emergency response plans for release and threatened release of the covered materials.~~ ~~The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.~~ In the event that the mitigation measure is not removed, please modify language to reflect SCE's submittal process for HMBPs. M HZ-1: Hazardous Materials Business Plan. A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on: • Hazardous materials stored at the Mesa Substation over threshold quantities. • A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points. • Emergency response plans for release and threatened release of the covered materials. ~~The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.~~ <u>The HMBP must be submitted at least 30 days prior to storage of covered hazardous materials via the California Environmental Reporting System (CERS). A receipt, showing that the agency received the Plan, must be submitted to the CPUC prior to storage of covered hazardous materials.</u>"	The Hazardous Materials Business Plan and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.	Prior to Construction	Wherever hazardous materials over 55 gallons, 200 cubic feet, or 500 pounds are stored.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
"MM HZ-2: Hazardous **Materials Training**. Prior to construction, the applicant will prepare and implement a worker environmental awareness program (WEAP) for CPUC review and approval that includes: • **Instruction** regarding the location of Material Safety Data Sheets, as well as proper labeling, storage, use, transport, and disposal of hazardous materials. • **Information** on common contaminants that could be uncovered in the proposed project area and instruction regarding appropriate procedures if potentially contaminated soil is present. • **Procedures** for spill response will be in compliance with existing laws and regulations ~~under the SPCC (MM HZ-3)~~ including notification to appropriate personnel, including the Spill Response Coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination. • Instruction on **individual** responsibilities under the Clean Water Act, the project SPCC, the project SWPPP, and site-specific BMPs. • Instruction on compliance with OSHA regulations and procedures if landfill gas is encountered during excavations.	CPUC verifies Hazardous Materials Training has been prepared and administered, and that SCE maintains records documenting attendees at each training.	Prior to Construction.	Entire project area.
~~**MM HZ-3: Spill Prevention, Control, and Countermeasure Plan.** SCE shall prepare a site-specific SPCC plan that identifies spill response and prevention measures and BMPs. SCE shall indicate site-specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction for review and approval.~~ In the event that the mitigation measure is not removed, please modify language to reflect SCE's submittal process for SPCC. **MM HZ-3: Spill Prevention, Control, and Countermeasure Plan.** SCE shall prepare a site-specific SPCC plan that identifies spill response and prevention measures and BMPs. SCE shall indicate site-specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to ~~construction~~ delivery of any additional transformer oil to the site ~~for review and approval~~.	SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC plan, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction for review and approval.	Prior to Construction – ~~Prepare a SPCC plan.~~ ~~During and Post-construction – Implement~~ Submit the SPCC plan	Entire project area.
MM HZ-4: Contaminated Soil Contingency Plan. Prior to construction, the applicant will submit a Contaminated Soil Contingency Plan to the CPUC for review and approval. The plan will include practices that are consistent with the California Title 8 and Occupational Safety and Health Administration (Cal-OSHA) regulations and will outline steps that would be implemented if contaminated soils are encountered. The objective of the plan will be to minimize risk to the public and to the environment resulting from exposure to and disturbance of contaminated soils. At a minimum, the plan would include procedures for the following steps: • Identifying potentially impacted soil; • Establishing a no-work zone for potentially contaminated areas; • Assessing potentially impacted soil; • Notifying appropriate agencies, • Cleanup procedures; • Impacted soil storage; • Verification sampling; and, • Impacted soil characterization and disposal. During construction an appropriately trained construction personnel, under the supervision of a California licensed registered geologist or professional engineer, will be present to monitor soil conditions during all earthmoving activities. If potentially contaminated soils are encountered during construction, the applicant would implement the Contaminated Soil Contingency Plan to assess the soils and to determine appropriate procedures based on the nature of the contamination, which may include avoidance or collection and analysis to determine appropriate disposal or treatment options.	Prior to construction, the applicant will submit a Contaminated Soil Contingency Plan to the CPUC for review and approval. During construction, CPUC shall verify that an appropriately trained construction personnel, under the supervision of a California licensed registered geologist or professional engineer, will be present to monitor soil conditions during all earthmoving activities.	Prior to Construction – Develop a Contaminated Soil Contingency Plan. During Construction – Implement the Contaminated Soil Contingency Plan.	Entire project area.
MM HZ-5: Well Management Plan. Prior to construction, the applicant will prepare and submit to CPUC a Well Management Plan in coordination with OII Landfill and the U.S. EPA in order to prevent contamination of groundwater and subsurface soil. The plan will include procedures for well	Prior to construction, the applicant will prepare and	Prior to Construction	All project areas containing monitoring wells.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
decommissioning or protection for all monitoring wells located within the footprint of the proposed project. The plan will be reviewed and approved by CPUC prior to construction. Proper well decommissioning or protection/avoidance measures would be implemented prior to beginning other ground disturbing activities within the proposed Mesa Substation site area The Well Management Plan would address the following: • Identification of wells that would be avoided during construction and wells that would be decommissioned, • Well decommissioning schedule, • Well decommissioning procedures, • Procedures for the protection of wells that are to be avoided during construction, • Procedures for granting access to OII Landfill's monitoring wells during construction activities. Procedures should address compliance to the proposed project's APMs and MMs.	submit to CPUC a Well Management Plan in coordination with OII Landfill and the EPA. The plan will be reviewed and approved by CPUC prior to construction.		
Hydrology and Water Quality			
~~**MM HY-1: Stormwater Pollution Prevention Plan.** The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB 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) will be used in all ground disturbance areas.~~ ~~• During construction activities, measures would be in place to ensure that contaminants are not discharged from construction sites. The SWPPP would define areas where hazardous materials and trash would be stored; where vehicles would be parked, fueled and serviced; and where construction materials would be stored.~~ ~~• Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, 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, and to preserve roadways and adjacent properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities.~~ ~~• Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, 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 would be cleaned up immediately and contaminated soils removed to approved disposal areas.~~ ~~• Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system~~ ~~• Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems.~~ ~~Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction.~~ In the event that the MM HY-1 is not removed as requested. Please modify the language as follows. MM HY-1: Stormwater Pollution Prevention Plan. The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water	Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the CPUC at least 30 days prior to start of construction.	Prior to Construction – Prepare an SWPPP. During Construction – Implement the SWPPP.	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB 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) will be used in all ground disturbance areas. • During construction activities, measures would be in place to ensure that contaminants are not discharged from construction sites. The SWPPP would define areas where hazardous materials and trash would be stored; where vehicles would be parked, fueled and serviced; and where construction materials would be stored. • Runoff, sedimentation, and erosion control measures would be implemented in compliance with the Storm Water Pollution Prevention Plan (SWPPP) which contains the Best Management Practices (BMPS) that would be implemented to prevent and control sedimentation and erosion during construction and to protect storm water runoff. The SWPPP will be site-specific and prepared in compliance with the Construction General Permit. ~~would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, 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, and to preserve roadways and adjacent properties.~~ BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities • Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, these maintenance activities shall be performed at least ~~150 feet~~ 50 feet, if feasible, 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 would be cleaned up immediately and contaminated soils removed to approved disposal areas. • Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system • Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. Verification of Construction General Permit coverage obtained from the State Water Resources Control Board (SWRCB) ~~approval and the approved SWPPP(s)~~ will be provided to the California Public Utilities Commission (CPUC~~) at least 30 days~~ prior to start of construction. The SWPPP will be kept onsite and will be made available upon ~~Updated SWPPPs will be provided to the CPUC on~~ request during construction."			
MM HY-2: Compliance with WDRs. Work in waters of the state shall be conducted in conformance with WDRs obtained for the proposed project. Mitigation measures shall be implemented in accordance with WDRs, and they may include avoidance, reduction, or compensatory measures. Groundwater extracted as a result of dewatering during construction shall not be discharged to Waters of the State unless such activities are covered by a WDR. Extracted groundwater shall be disposed of in one of the following manners in the absence of a WDR: • Discharge to an upland area where it will not enter Waters of the State but would instead evaporate or infiltrate. • Use for dust control. • Use for irrigation water. • Use for other construction needs. • Dispose of at a licensed facility if water is suspected of being contaminated or degraded.	CPUC verifies that all work within waters of the state are conducted in conformance with WDRs, and that appropriate mitigation measures are implemented in accordance with WDRs.	During Construction	All areas where construction would occur within waters of the state.
MM HY-3: Construction Drainage Plan. SCE shall prepare and implement a Drainage Plan that ensures runoff during construction activities at the Mesa Substation site will not exceed drainage capacity of the storm water system and other drainage facilities. Measures that can be employed can include:	SCE shall submit the plan to Monterey Park and CPUC for	Prior to Construction – Prepare a Drainage Plan.	Mesa Substation site

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
• Constructing the detention basin earlier in construction. • Constructing temporary detention basins on site. • Creating infiltration areas to limit runoff that enters the storm water system. SCE shall submit the plan to Monterey Park ~~and CPUC~~ for review and approval prior to beginning construction activities at the substation site. SCE will provide a copy of the grading permit to the CPUC."	review and approval prior to beginning construction activities at the substation site.	During Construction – Implement the Drainage Plan.	
MM HY-4: Detention Basin Design. SCE shall design the detention basin on the proposed Mesa Substation site in accordance with the City of Monterey Park requirements ~~Los Angeles County Department of Public Works Hydrology Manual (LACDPW2006)~~. The Hydrology Manual contains techniques to calculate runoff flow rates and volumes based on Los Angeles County's historic precipitation and runoff. As applicable, the detention basin shall be designed in accordance with the City of Monterey Park requirements. ~~Los Angeles County Department of Public Works Low Impact Development Standards Manual (LACDPW2014).~~"	CPUC shall verify that the detention basin is designed in accordance with the Los Angeles County Department of Public Works Hydrology Manual prior to beginning construction of the proposed project.	Prior to Construction	Mesa Substation site
MM HY-5: Dam Failure Evacuation Training. As part of the Worker Environmental Awareness Program, SCE shall train construction workers on evacuation routes in the event of dam failure. Workers to be trained shall include those located in the dam inundation areas of the Garvey Reservoir south dam, Eaton Canyon Dam, Garvey Reservoir north dam, and Santa Fe Dam.	CPUC shall verify that SCE trains all construction workers located in the dam inundation areas of the Garvey Reservoir south dam, Eaton Canyon Dam, Garvey Reservoir north dam, and Santa Fe Dam on evacuation routes in the event of dam failure prior to construction of the proposed project.	Prior to Construction	Work located within dam inundation areas of the Garvey Reservoir south dam, Eaton Canyon Dam, Garvey Reservoir north dam, and Santa Fe Dam.
~~**MM HY-6: Dam Inundation Substation Protection.** SCE shall incorporate dam inundation measures into its substation at the design phase to reduce the potential for widespread outages and equipment damages in the event of failure of the south dam at Garvey Reservoir. Measures could include: • Concrete perimeter wall and flood gates at entry ways; • Elevation of key substation equipment above inundation levels; or • Sealing of equipment buildings.~~	CPUC shall verify that dam inundation measures are incorporated in the substation at its design phase.	Prior to Construction	All project areas located within the inundation areas of the south dam at Garvey Reservoir.
Noise and Vibration			
MM NV-1: Noise ~~Control~~ Plan. Prior to the start of construction, the applicant shall prepare a Noise Control Plan to ~~ensure that~~ reduce project construction noise. ~~does not:~~ ~~• Increase **ambient** noise levels by more than 10 dBA (8-hour Leq), or~~ ~~• Exceed the noise **level** specified in the applicable jurisdiction's noise ordinance.~~ The Noise Control Plan measures ~~shall~~ will be selected based on the specific equipment used ~~and~~, activity conducted, and proximity to sensitive noise receptors ~~once known~~. The applicant shall submit the Noise Control Plan to the CPUC at least 30 days prior to the start of construction for review and approval. The Noise Control Plan will ~~shall include, but not be limited to,~~ consider the following noise reduction and control measures: • Temporarily and safely install and maintain an absorptive noise control barriers placed between stationary construction equipment and sensitive noise receptors. ~~in the perimeter of construction sites located within 200 feet of noise- intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers and ensure such barriers are installed in a safely manner.~~ • Limit ~~heavy~~ heavy-equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity. • Efforts will be made to ~~E~~ensure that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition. • ~~Maintain~~ Efforts will be made to maintain construction equipment according to manufacturer recommendations. • Minimize construction equipment idling to the extent feasible. ~~• Reduce noise from back-up~~ alarms ~~(alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimizes the need for back-up alarms and use flagmen to minimize the time needed to back up vehicles.~~ • When possible, use construction equipment specifically designed for low noise emissions (~~i.e.~~ e.g.~~, equipment that is powered by~~ electric or natural	Verify identification of a Construction Relations Officer and mailing of notices at least 30 days prior construction. ~~Review~~ Submit monthly reports to the CPUC Verify implementation of noise control measures.	Prior to Construction – Prepare a Noise Control Plan. During Construction – Implement the Noise Control Plan.	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
gas engines instead of diesel or gasoline reciprocating engines). ~~Electric engines have been reported to have lower noise levels than internal combustion engines.~~ • Where practical, locate stationary equipment such as compressors, generators, and welding machines away from sensitive receptors ~~or behind barriers~~. The Noise Control Plan ~~shall~~ will detail the frequency, location, and methodology for noise monitoring prior to and during various construction and restoration activities to ensure ~~that~~ reduce generated noise levels ~~do not exceed 10 dBA above existing ambient noise levels, or the applicable jurisdiction noise standards~~. These methods shall include monitoring noise levels at the boundary of construction areas and using industry-standard computer noise modeling techniques to predict noise levels at adjacent sensitive noise receptors. Should the modeled levels exceed the standards in the applicable jurisdiction's noise standards, noise monitoring near the sensitive receptors shall be conducted to verify the modeling results. The Noise Control Plan shall detail the actions and procedures that the applicant shall implement to mitigate impacts in the event that monitoring detects noise levels that have exceeded the criteria specified in this EIR. Noise level measurements shall be conducted in compliance with ~~the City of Monterrey Park, City of Montebello, City of Commerce, City of Bell Gardens, City of Pasadena, and Los Angeles County requirements~~ local agency requirements, if available. The Noise Control Plan ~~shall~~ will designate a Construction Relations Officer who is readily available to answer questions or respond to complaints during active ~~any hours or days that~~ construction or restoration periods ~~is occurring~~. The applicant shall send pre-construction notifications to sensitive receptors located within 100 feet of construction activities at least 30 days prior construction. The notification shall include a phone number for the public to contact the Construction Relations Officer. Additionally, each construction site shall include clearly visible signs with the Construction Relations Officer's public phone number. The applicant shall submit monthly reports to the CPUC summarizing the complaints submitted to the Construction Relations Officer. The summary reports shall describe how each complaint was addressed, if and when it was resolved, and the contact information for the member of the public who submitted the complaint, if available."			
~~**MM NS-2: Compliance with Monterey Park Ordinance.** As soon as Mesa Substation is fully operational, the applicant shall conduct noise measurements to ensure that the operational noise levels from the substation transformers do not exceed the City of Monterey Park's 50-dBA nighttime noise standard at the closest receptor. If the threshold is exceeded, the applicant shall implement engineering solutions, including, but not limited to, barrier walls around the transformer, sound absorbing panels, and/or noise cancellation methods until the project does not exceed the threshold. SCE must submit the noise measurements in the form of a memorandum to the CPUC within two weeks of measurement. Reports shall be submitted until the CPUC verifies that operation noise does not exceed the City of Monterey Parks' 50-dBA nighttime threshold.~~	SCE must submit the noise measurements in the form of a memorandum to the CPUC within two weeks of measurement. Reports shall be submitted until the CPUC verifies that operation noise does not exceed the City of Monterey Parks' 50-dBA nighttime threshold.	Post-construction	Mesa Substation site
MM NS-3: Noise from Helicopter Operations. For all construction activities that would include helicopter operations, SCE shall provide at least one week's advance notice to all property owners within 660 feet of the proposed helicopter operation areas. The announcement would state that the use of helicopters is anticipated and would provide the start date, anticipated completion dates, hours of helicopter usage, and a telephone contact number for questions or complaints during construction. In addition, helicopters would maintain a height of at least 500 feet when passing over residential areas, as well as a lateral distance of at least 500 feet from all schools and hospital buildings, except when they are at construction areas or actively assisting with construction activities.	The CPUC shall verify that notice to all property owners within 660 feet of the proposed helicopter operation areas is provided at least one week prior to helicopter operation.	Prior to Construction – provide notice at least 7 days prior to helicopter operation.	All project areas in which helicopter operations would occur.
MM NV-4: Positioning of Helicopter Landing and Takeoff Areas. SCE shall position helicopter landing and takeoff areas in Staging Yards 1, 2, and 3, ~~and 4~~ as far away as feasible from sensitive receptors, while not sacrificing the safety of helicopter operations due to hazards (e.g., transmission lines) in and around the staging yards.	SCE must submit helicopter locations to the CPUC for review and approval at least 30 days prior to use of the helicopter location.	Prior to Construction	Helicopter take-off and landing areas.
MM NS-5: Noise Notification and Coordination for Whittier Narrows Natural Area. The applicant shall provide notice to the Whittier Narrows Natural Area at least 30 days prior to construction activities occurring in that area to alert nearby users of the construction activities and give them the opportunity to avoid the noise. The notice shall include dates, times, and descriptions of construction activities, in addition to directions to at least two comparable alternative nearby recreational facilities. The applicant shall also coordinate with the Whittier Narrows Natural Area to ensure that activities causing an increase in noise of over 10 dBA above ambient noise levels do not occur in the Whittier Narrows Natural Area during any planned special events. SCE shall provide documentation of the notice and coordination to the CPUC at least 20 days prior to construction.	SCE shall provide documentation of the notice and coordination to the CPUC at least 20 days prior to construction. The CPUC shall verify that notice has been provided to Whittier Narrows at least 30 days prior to construction and that coordination has occurred such that noise levels do not violate identified maximums.	Prior to Construction	Whittier Narrow Natural Area
Public Services and Utilities			
MM PS-1: Relocation Agreement with Municipal Water District. Prior to construction that would take the MWD's 72-inch Middle Feeder Pipeline out of	SCE shall submit to the CPUC	Prior to Construction	Main project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
service, the applicant shall reach an agreement with the MWD that will identify an alternate alignment that crosses the project site. This relocation agreement will enable the MWD to maintain reliable deliveries of treated water to its member agencies during relocation of the pipeline. SCE shall submit to the CPUC information from the MWD confirming that relocation of the pipeline will not result in inability to adequately serve customers. SCE shall submit this documentation at least 30 days prior to the pipeline being taken out of service.	information from the MWD confirming that relocation of the pipeline will not result in inability to adequately serve customers. SCE shall submit this documentation at least 30 days prior to the pipeline being taken out of service.		
Traffic and Transportation			
MM TT-1: Traffic **Control Plan.** The Plan shall be consistent with the California Joint Utility Traffic Control Manual (CJUTCM) and include, at a minimum, measures to ensure that: 1. Significant impacts to affected intersections during the AM or PM peak hours (and during the specified phase) are reduced to less than significant levels, i.e., reduce the V/C increase resulting from the proposed project at each identified intersection to at or below the applicable threshold. Primary measures may include: • Limiting project-related heavy truck trips during peak hours (e.g., through scheduling deliveries outside of peak hours) so as to reduce trips occurring during peak hours; and • Limiting project construction worker vehicle trips during peak hours (e.g., through requiring carpooling) so as to reduce trips occurring during peak hours. 2. General plans or guidelines be developed to provide safety for motorists, bicyclists, pedestrians, workers, enforcement/emergency officials and equipment in consideration of basic safety principles to route roadway users through construction zones using roadway geometrics and features and traffic control devices comparable to normal roadway situation as possible. The Plan detail shall be appropriate to the complexity of the project work. 3. Roadway user movement should be inhibited as little as practical, based on the recommended considerations of the California Manual on Uniform Traffic Control Devices (CA MUTCD) latest edition, including proper signage, avoiding abrupt changes in geometrics, reducing traffic volume by using alternate routes scheduling work in off-peak hours, and complying with the Americans with Disabilities Act of 1990 (ADA). 4. During truck delivery and exit hours, SCE shall post slow truck warning signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the CA MUTCD. 5. Motorists, bicyclists and pedestrians are guided in a clear and positive manner while approaching and traversing TTC zones and incident sites, applying the principles for proper marking, signing, and flagging. 6. Acceptable levels of operations are provided and routine day and night inspections of Plan elements are implemented. 7. Roadside safety is maintained during the life of the project to accommodate disabled vehicles, run-off-the-road incidents, and emergency situations. 8. Appropriate field workers and management receive training appropriate to the job decisions each individual is required to make. 9. Good public relations are maintained by assessing the needs of the road users, abutting property owners, and emergency service providers (law enforcement, fire fighters, and medical) and cooperating with various news media, SCE shall notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of road closures at least 1 week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE would also make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers, such as keeping metal plates available to cover open trenches. Specific measures would be dependent on the final construction schedule and residing location of construction workers. Measures implemented as part of the plan shall not result in exceedance of applicable thresholds as described in this document at other impacted intersections. The plan shall	A project-specific Traffic Management Plan is prepared by SCE according to provisions identified in this mitigation measure. SCE shall submit the plan for CPUC review and approval at least 60 days prior to the start of construction.	Prior to Construction – Prepare a Peak Period Traffic Management Plan. During Construction – Implement the Peak Period Traffic Management Plan.	Entire project area.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

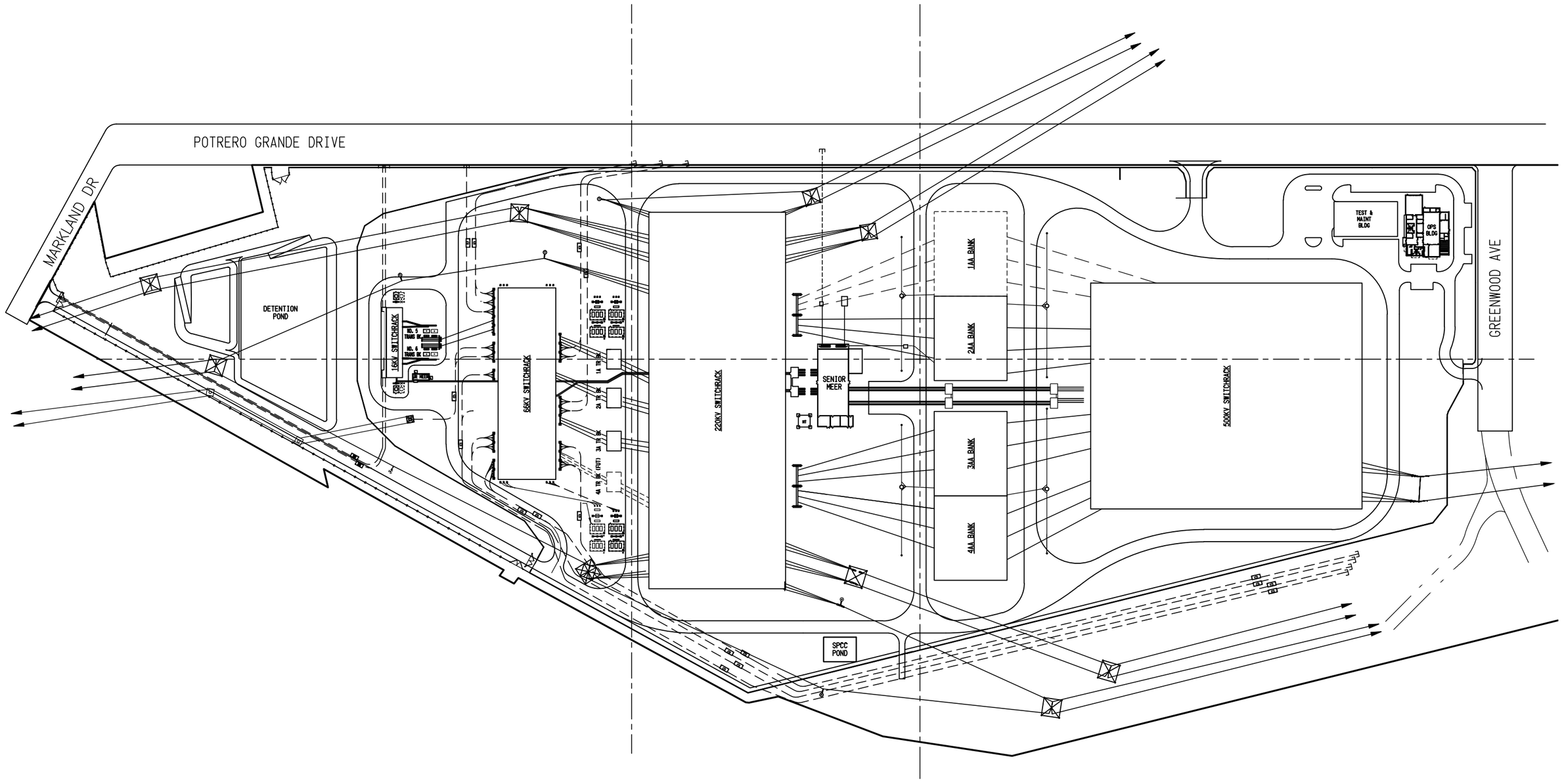
APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
also demonstrate that mitigation would not result in V/C to exceed thresholds at significantly impacted and non-significantly impacted roads and intersections."			
~~MM TT-2: Road and Lane Closure Plan.~~ ~~SCE shall develop a Road and Lane Closure Plan for the proposed project that outlines how SCE will handle road and lane closures to allow for safe vehicle, bicyclist, and pedestrian passage when road and lane closures occur. The Plan shall be prepared in coordination with local jurisdictions where road and lane closures would occur. Upon determination of the final construction schedule and precise locations and durations of road and lane closures, the Plan shall describe locations and durations of:~~ ~~• Full road closures~~ ~~• Lane closures~~ ~~• Bicycle lane closures~~ ~~• Sidewalk or pedestrian path closures~~ ~~Measures to be included in the Plan that would allow for safe vehicle, bicyclist, and pedestrian passage shall adhere to the California Manual on Uniform Traffic Control Devices. Potential measures include:~~ ~~• Signage directing motorists, pedestrians, and bicyclists to an efficient, safe detour around the closure~~ ~~• Flaggers and/or signage to halt traffic at road closures or direct traffic at lane closures and to allow traffic to pass when construction is halted~~ ~~• Requirements for notifications and a process for communication with affected residents and landowners prior to the start of construction.~~ ~~• Emergency service providers would be notified of the timing, location, and duration of construction activities.~~ ~~• Requirement that emergency vehicle access is maintained at all times.~~ ~~The Road and Lane Closure Plan can be included as part of a Transportation Management Plan for the project.~~	CPUC verifies that a Road and Lane Closure Plan is developed, and SCE coordinates with local jurisdictions where road and lane closures would occur.	Prior to Construction – Prepare a Road and Lane Closure Plan. During Construction – Implement the Road and Lane Closure Plan.	Roads or lanes that would be closed due to construction.
~~MM TT-3: Highway Closure Plan.~~ ~~SCE shall prepare a Highway Closure Plan to include in its encroachment permit application for crossings of SR-60 that require closure or partial closure of SR-60. The Highway Closure Plan shall:~~ ~~• Specify that partial and complete closures of SR-60 are prohibited during peak and daytime (5 a.m. to 10 p.m.) hours.~~ ~~• Require that SCE adhere to Caltrans' requirements regarding signage to notify motorists of the impending closure.~~ ~~• Map potential detours for SR-60 traffic.~~ ~~The measures in the plan shall minimize delays to SR-60 traffic. No work shall occur in Caltrans right-of-way until Caltrans issues the encroachment permit and approves the Highway Closure Plan.~~	The CPUC shall verify that the measures in the Highway Closure Plan are adhered to and that no work shall occur in the Caltrans ROW until Caltrans issues the encroachment permit.	Prior to Construction – Prepare a Highway Closure Plan. During Construction – Implement the Highway Closure Plan.	Crossings of SR-60 that require closure or partial closure of SR-60.
~~MM TT-4: Helicopter Lift Plan.~~ ~~SCE's helicopter contractor shall coordinate with FAA and obtain FAA-required approvals for helicopter operations. SCE's contractor's submittal shall include a Helicopter Lift Plan for operations within 1,500 feet (457 meters) of a congested area or within 1,500 feet (457 meters) 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. Measures may include:~~ ~~• Designating who is responsible for equipment inspections~~ ~~• Communication procedures~~ ~~• Establishment of exclusion zones where pedestrians will not be allowed~~ ~~• Training of personnel in safety requirements and procedures~~ ~~The Plan and record of FAA approval shall be provided to the CPUC prior to commencing helicopter operations.~~	The Plan and record of FAA approval shall be provided to the CPUC prior to commencing helicopter operations.	Prior to Construction	Areas where helicopters will be used within 1,500 feet of residences.
~~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:~~	SCE shall provide documentation of the FAA finding to the CPUC prior to the use of equipment or	Prior to Construction	All project areas where construction equipment, such as cranes, and structures, such as

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
• Use of construction equipment, such as cranes; and • 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.	installation of structures that require notification under 14 CFR 77.		steel lattice towers, are being installed.
MM TT-6: Slow Truck Warnings. During truck delivery and exit hours, SCE shall post signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the California Manual on Uniform Traffic Control Devices.	CPUC shall ensure that SCE posts signage at appropriate locations.	During Construction	Any work area where there is a possibility for slow trucks to exit the substation site.
MM TT-7: Road Damage Repair. SCE shall repair to pre-project conditions any roads damaged by project vehicle traffic within 60 days of completion of construction. 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 any repairs that document restoration of pre-project pavement conditions. Documentation of original conditions and repair shall be submitted to the CPUC for review and verification within 30 days of repair completion.	Documentation of original conditions and repair shall be submitted to the CPUC for review and verification within 30 days of repair completion.	Prior to Construction – Document pre-project conditions. Post-construction – Repair roadway damage.	Any roads damaged by project vehicle traffic.
MM TT-8: 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 1 week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE would also make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers, such as keeping metal plates available to cover open trenches.	The CPUC verifies that SCE has notified all local emergency service providers or road closures at least one week prior to the closure. CPUC also verifies that emergency vehicle access is maintained at all times.	During Construction	All project areas where road closures would occur.
MM TT-9: Public Transit, Pedestrian, and Bicyclist Plan. SCE shall develop and implement a Public Transit, Pedestrian, and Bicyclist Plan with the goal of maintaining safe conditions for pedestrians and bicyclists during construction of the proposed project. Safe conditions include detours for closed sidewalks and closed bicycle lanes as well as relocation of transit stops to areas not affected by construction activities. The control measures included in the Plan shall be based on final plans for closures of sidewalks and bicycle lanes and transit stops. The measures shall be consistent with those published in the California Joint Utility Traffic Control Manual (California Inter-Utility Coordinating Committee 2010).The Plan should include, at a minimum, the measures listed below: • Notify LA Metro and other public transit providers of construction along existing public transit routes. The applicant would work with transit providers to temporarily relocate transit stops during construction, if needed. • Provide pedestrians with reasonably safe, convenient, and accessible paths that replicate as nearly as possible the most desirable characteristics of the existing paths (i.e., maintaining sidewalk and bicycle access on at least one side of affected streets during construction). • Layout plans for notifications and a process for communication with affected transit riders, pedestrians, and bicyclists prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which transit routes, bus stops, sidewalks, and bicycle routes would be affected on which days and for how long), and a toll-free telephone number for receiving questions or complaints. • Post detour signs during construction of alternative routes for pedestrians and bicyclists. • Install steel plates over open trenches in inactive construction areas to maintain existing bicycle and pedestrian access after construction hours.	The CPUC verifies that SCE develops and implements the Public Transit, Pedestrian, and Bicyclist Plan, and the control measures in the Plan are consistent with the California Utility Traffic Control Manual.	Prior to Construction – Develop a Public Transit, Pedestrian, and Bicyclist Plan. During Construction – Implement the Public Transit, Pedestrian, and Bicyclist Plan.	Entire project area.
MM TT-10: Whittier Narrows Park-and-Ride Lot. If proposed project work on Telecommunications Route 3 would result in temporary closure of the Whittier Narrows park-and-ride lot exit to Durfee Avenue, SCE shall coordinate with Los Angeles County and the Whitter Narrows Recreation Area so that SCE can provide traffic control for two-way traffic at the Santa Anita Avenue entrance to the Whittier Narrows park-and-ride lot during the Durfee Avenue exit closure.	CPUC verifies that SCE coordinates with Los Angeles County and the Whittier Narrows Recreation Area to provide traffic control during the Durfee Avenue exit closure.	During Construction	Whittier Narrows park-and-ride lot

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
MM TT-~~11~~2: Community Education Center Parking. Pasadena City College Community Education Center Parking. If proposed project work at the Goodrich Substation would result in parking spot closures at the Pasadena City College Community Education Center parking lot, SCE ~~shall~~ will coordinate scheduled closures with the Pasadena City College Community Education Center on the following ~~and shall obtain a letter from the Community Education Center that states~~: • The dates of parking spot closures; • The number of parking spots that would be closed; and • That the Pasadena City College Community Education Center concurs that there will be sufficient parking spots to accommodate SCE's work and the Pasadena City College Community Education Center's parking needs. SCE ~~shall~~ will ~~submit the letter~~ provide documentation of the coordination with the Pasadena City College Community Education Center to the CPUC 30 days prior to Pasadena City College Community Education Center parking spot closure."	SCE ~~shall~~ will ~~submit the letter~~ provide documentation of the coordination to the CPUC 30 days prior to Pasadena City College Community Education Center parking spot closure.	During Construction	Community Education Center parking lot


POTRERO GRANDE DRIVE
MARKLAND DR
GREENWOOD AVE
DETENTION POND
16KV SWITCHRACK
NO. 5 TRANS BK
NO. 6 TRANS BK
66KV SWITCHRACK
1A TR BK
2A TR BK
3A TR BK
4A TR BK (OUT)
220KV SWITCHRACK
SENIOR MEER
1AA BANK
2AA BANK
3AA BANK
4AA BANK
500KV SWITCHRACK
TEST & MAINT BLDG
OPS BLDG
SPCC POND

Source: Environmental Vision, June 2016

KOP 3 – Existing view from Potrero Grande Drive at Saturn Street looking southwest

KOP 3 – Visual Simulation of the Proposed Project
Note: Visual simulation revised June 2016 with updated project data

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Figure 4.1-5e

Visual Simulation - Updated
KOP 3 – Landscape Option 1: View Southwest from Potrero Grande Drive at Saturn Street
Mesa 500-kV Substation Project

Source: Environmental Vision, June 2016

KOP 3 – Existing view from Potrero Grande Drive at Saturn Street looking southwest

KOP 3 – Visual simulation of the Proposed Project with shrub and groundcover landscaping

Note: Visual simulation revised June 2016 with updated project data

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Figure 4.1-5f

Visual Simulation - Updated
KOP 3 – Landscape Option 2: View Southwest from Potrero Grande Drive at Saturn Street
Mesa 500-kV Substation Project

Source: Environmental Vision, June 2016

KOP 6 – Existing view from westbound State Route 60 near Greenwood Avenue

KOP 6 – Visual simulation of the Proposed Project

Note: Visual simulation revised June 2016 with updated project data

1009133.0001.04.j.ai 02/04/2016

Figure 4.1-5h

KOP 6: Visual Simulation - Updated
View West from the Pomona Freeway Near Greenwood Avenue
Mesa 500-kV Substation Project

Source: Environmental Vision, June 2016

KOP 7 – Existing view from North Vail Avenue near Appian Way looking northeast

KOP 7 – Visual simulation of the Proposed Project

Note: Visual simulation revised June 2016 with updated project data

1009133.0001.04.k.ai 02/04/2016

Figure 4.1-5i

KOP 7: Visual Simulation - Updated
View Northeast from North Vail Avenue Near Appian Way
Mesa 500-kV Substation Project