SOUTHERN CALIFORNIA EDISON'S DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Final Environmental Impact Report
(Response to Comments)

CPUC A.08-01-029
SCH#: 2008041087

Prepared for
California Public Utilities Commission

April 2010

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Prepared for:
California Public Utilities Commission
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April 2010

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CHAPTER 1
Introduction

1.1 Purpose

This Response to Comments document is the finalizing addendum to the Draft Environmental Impact Report (Draft EIR) prepared by the California Public Utilities Commission (CPUC) for consideration of Southern California Edison's (SCE's) application to construct the Devers-Mirage 115 kV Subtransmission System Split Project (Proposed Project).

The Draft EIR detailed the Proposed Project, evaluated and described the potential environmental impacts associated with the construction, operation, and maintenance of SCE's Proposed Project, identified those impacts that could be significant, and presented mitigation measures, which, if adopted by the CPUC or other responsible agencies, could avoid or minimize these impacts. The Draft EIR also evaluated alternatives to the Proposed Project, including the No Project Alternative, as required by the California Environmental Quality Act (CEQA).

The Proposed Project would serve projected electrical demand in the Electrical Needs Area, which includes the cities of Palm Springs, Rancho Mirage, Cathedral City, Palm Desert, Indian Wells, and unincorporated areas of Riverside County, including the Thousand Palms community. The primary components of the Proposed Project include two new 115 kV subtransmission line segments and a loop-in of the existing Devers-Coachella Valley 220 kV transmission line into Mirage Substation. Other components include rearrangements and modifications of subtransmission line connections, construction of substation modifications in the cities of Palm Springs, Rancho Mirage, Indian Wells, Cathedral City, Palm Desert, and unincorporated areas of Riverside County, including the Thousand Palms community, and minor modifications to existing telecommunications equipment at the Edom Hill Communications site and the Palm Springs Service Center.

This Response to Comments document, together with the January 2010 Draft EIR, constitutes the Final EIR for the Proposed Project. The CPUC, as the Lead Agency for this process, is required by CEQA Guidelines Section 15089 to prepare a Final EIR. The Final EIR will be used by the CPUC as part of its application approval process, which includes selecting project alternatives, adopting mitigation measures, and reviewing project costs.

1.2 Organization of the Final EIR

As required by CEQA Guidelines Section 15132, the Final EIR consists of the following elements:

(a) The Draft EIR or a revision of the draft;

(b) Comments received on the Draft EIR either verbatim or in summary;

(c) A list of persons, organizations, and public agencies that commented on the Draft EIR;

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and

(e) Any other information added by the lead agency.

The Final EIR for the Proposed Project contains information in response to concerns that were raised during the public comment period (January 8, 2010 through February 22, 2010).

This Response to Comments document consists of the following six chapters.

- **Chapter 1** is an introductory chapter that describes the purpose as well as the organization of the Final EIR.
- **Chapter 2** describes the organization of the comment letters, and the coding system used to identify individual comments. It also describes the organization of the responses to the comments received on the Draft EIR, and includes a list of all organizations and agencies that submitted comments.
- **Chapter 3** contains copies of the comment letters received on the Draft EIR after publication of the Draft EIR.
- **Chapter 4** contains responses to comments and also contains text changes to the Draft EIR that resulted from changes made in response to comments.
- **Chapter 5** contains all text changes to the Draft EIR which include both (1) changes to correct errors or to clarify information presented in the Draft EIR, and (2) text changes as a result of responding to comments, as presented in Chapter 4.
- **Chapter 6** lists all agencies, organizations, and persons that are receiving the Final EIR. This includes all those that submitted comments on the Draft EIR.
- **Appendices**, provides supporting documentation for information presented in the Response to Comments Document. A digital copy of the Draft EIR, published January 2010, and this Response to Comments document is included on a compact disc (CD) at the end of this document.

CHAPTER 2
Introduction to Comments and Responses

2.1 Opportunities for Public Comment on the Draft EIR

Notification

On January 7, 2010, the CPUC published and distributed the Notice of Availability (NOA) of a Draft EIR to advise interested local, regional, State, and federal agencies, and the interested public, that a Draft EIR had been prepared and published for the Proposed Project. The NOA solicited both written and verbal comments on the Draft EIR during a 45-day comment period (January 8, 2010 through February 22, 2010), and provided information on a forthcoming public comment meeting. Additionally, the NOA presented the background, purpose, description, and location of the Proposed Project, as well as the contact name for additional information regarding the project.

In addition to the NOA, the CPUC notified the public about the public comment meeting through two newspaper legal advertisements and the project website. The NOA, newspaper legal advertisements, and the project website are presented in Appendices A, B, and C, respectively. Notifications provided basic project information, the date, time, and location of the public comment meeting, and a brief explanation of the public meeting process.

The CPUC published legal advertisements in The Desert Sun on January 9 and January 16, 2010. Additionally, an electronic copy of the NOA and the Draft EIR were posted on the CPUC's website at: http://www.cpuc.ca.gov/Environment/info/esa/devers-mirage/deir_toc.html.

The public was encouraged to submit written comments and concerns regarding the Proposed Project and the adequacy of the Draft EIR by mail, facsimile, or electronic mail to the CPUC.

Public Comment Meeting

The CPUC conducted a public comment meeting on Friday, January 29, 2010, from 6:30 to 9:30 p.m. at the California State University San Bernardino (CSUSB) Palm Desert Campus, at 37-500 Cook Street, Palm Desert, California. Three agency representatives attended the public meeting, including Eric Chiang of the CPUC, and Doug Cover and Matthew Fagundes of Environmental Science Associates. A presentation (Appendix D) was prepared that included an overview of the environmental review process, the regional context, project background, project objectives, project description, project alternatives, and role of the public comments. No members of the public attended the comment meeting.

2.2 Comments on the Draft EIR

Written Comments

Two (2) comment letters were received during the Draft EIR public review period, one from the Native American Heritage Commission and one from Southern California Edison. These comment letters were designated as letter O1 and O2, respectively, with the 'O' indicating that the letter was from an organization. Individual comments within letter O1 are marked sequentially with numbers, such as O1-1, O1-2, etc. Comments from letter O2 are divided into two sections; the first includes global comments that are marked alphabetically (e.g., O2-a, O2-b, etc.) and the second includes discrete comments on the document that are marked numerically (e.g., O2-1, O2-2, etc.). Copies of both letters are provided in Chapter 3.

Public Meeting Comments

As noted above, a public meeting was held on Friday, January 29, 2010, at the CSUSB Palm Desert Campus in Palm Desert, California. No members of the public attended and therefore no comments were received at the meeting.

2.3 Responses to Comments

As required by Section 15132 of the Guidelines for CEQA, the responses in Chapter 4 address issues raised by commenters during the review period. They are intended to provide clarification and refinement of information presented in the Draft EIR and, in some cases, to correct or update information in the Draft EIR. In some instances, the text of the Draft EIR has been revised in response to a comment, and the revised text is included as part of the response. Where responses have resulted in changes to the text of the Draft EIR, these changes are shown within the Draft EIR text using the following conventions:

1) Text added to the wording in the Draft EIR is shown in <u>underline</u>,
2) Text deleted from the wording in the Draft EIR is shown in ~~strikeout~~, and
3) Text changes are shown in indented paragraphs.

These text changes also appear in Chapter 5, *Revisions to the Draft EIR*, of this document.

2.4 List of Commenters and Comment Letters on the Draft EIR

The following table provides a list of all organizations that provided written comments on the Draft EIR during the public comment period (January 8, 2010 through February 22, 2010). No late comments or comments from public members were received.

TABLE 2(RTC)-1
ORGANIZATIONS THAT SUBMITTED COMMENTS ON THE DRAFT EIR

Comment Letter ID	Name of Commenter	Title	Organization/Affiliation	Copy of Letter on Page
O1	Dave Singleton	Program Analyst	Native American Heritage Commission	3.1-1
O2	Milissa Marona	Project Manager	Southern California Edison	3.1-3

CHAPTER 3
Comment Letters

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Comment Letter O1

STATE OF CALIFORNIA Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net

Clear 2-22-10 e

RECEIVED
FEB 01 2010
STATE CLEARING HOUSE

January 28, 2010

Mr. Eric Chiang
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: SCH#2008041087 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **Southern California Edison Devers – Mirage 115 kV Subtransmission System Split Project;** located including the Communities of Palm Springs, Cathedral City, Rancho Mirage, Palm Desert, Indian Wells, Thousand Palms and unincorporated areas in the Coachella Valley; Riverside County, California

Dear Mr. Chiang:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources.. (Also see *Environmental Protection Information Center v. Johnson (1985) 170 Cal App. 3rd 604)* The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources **were identified** within one-half mile of the oval-shaped APE. O1-1

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11..

Consultation with tribes and interested Native American tribes and individuals, as consulting parties, on the NAHC list ,should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f]*et se),*

Comment Letter O1

36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. .

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance' may also be protected the under Section 304 of the NHPA or at the Secretary of the Interior' discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C, 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

O1-1 cont.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

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February 22, 2010

To: Eric Chiang
Devers-Mirage 115 kV Subtransmission System Split Project
c/o Environmental Science Associates
1425 N. McDowell Boulevard, Suite 200
Petaluma, CA 94954

From: Milissa Marona, Project Manager

RE: Southern California Edison's Comments on the Draft Environmental Impact Report for the Devers-Mirage 115 kV Subtransmission System Split Project (A.08-01-029)

Dear Mr. Chiang:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Devers-Mirage 115 kV Subtransmission System Split Project (A.08-01-29) (Project).

This letter and attachments contain Southern California Edison's (SCE's) comments on the DEIR.

SCE's comments are divided into two parts: Global Comments and Specific Comments. The Global Comments, included in the text of this letter, contain a general discussion of SCE's views regarding the DEIR selection of the environmentally superior alternatives. These Global Comments apply generally to the DEIR.

Specific Comments, attached to this letter in table format, apply to specific portions of the document. (Please see attached Specific Comments.)

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***GLOBAL COMMENT*: AS COMPARED TO ALTERNATIVES 3 AND 5,[1] SCE'S PROPOSED PROJECT DOES NOT RESULT IN MORE LONG-TERM, LESS-THAN-SIGNIFICANT IMPACTS; IS ENVIRONMENTALLY SUPERIOR; IS APPROXIMATELY 20-24 MILLION DOLLARS LESS COSTLY AND SHOULD BE THE ROUTE APPROVED FOR CONSTRUCTION.**

SCE disagrees with the DEIR's analysis and conclusion that Alternatives 3 and 5 are the environmentally superior routing options. First, although the DEIR analysis concludes that Alternatives 3 and 5 have greater air quality impacts than the Proposed Project, the analysis gives short shrift to the fact that Alternatives 3 and 5 result in much greater land disturbance than the Proposed Project. Although air quality impacts are significant and unavoidable for both Alternatives 3 and 5 and the Proposed Project, it is SCE's position that the Proposed Project is preferred because of the much less land disturbance that would be required. Second, the DEIR asserts that Alternatives 3 and 5 would have fewer long-term impacts in the areas of aesthetics, biology, and cultural resources and are thus environmentally preferred. SCE does not believe that the Proposed Project would result in more long term impacts in these areas, and, in fact, likely has *fewer* long-term aesthetic impacts and potentially *fewer* cultural resource impacts than Alternatives 3 and 5. In any event, *all* long-term impacts other than air quality are all less than significant. Further, SCE believes that the Proposed Project is the preferable alternative in the resource areas of noise, public services, traffic and transportation, and utilities and service systems. Finally, it should be noted that Alternatives 3 and 5 would cost approximately *five times more* than the Proposed Project, approximately $20-24 million dollars greater cost.

O2-a

As referenced above, the DEIR acknowledges that air quality impacts would be worse for Alternatives 3 and 5 as compared to the Proposed Project because of the trenching needed for the underground portions of those alternatives, but nevertheless concludes that the "varying degree between alternatives is not material enough to determine a preferred alternative from an air quality perspective." (DEIR, p. 5-9.) Further, the DEIR states that since all alternatives have significant unmitigable impacts on air quality during construction, the "selection of the

[1] Alternative 3: The Alternative 3 route between Farrell Substation and Garnet Substation would be comprised of both an underground and overhead portion. Approximately 3.6 miles of new underground facilities would be constructed from Farrell Substation along Vista Chino, Sunrise Way, San Rafael Drive, and a portion of Indian Canyon. Approximately 2.9 miles of subtransmission overhead facilities would be constructed along Indian Canyon Drive into Garnet Substation; this overhead section would be constructed in an area that has existing distribution, but no existing subtransmission. The Alternative 3 proposed overhead facilities would be approximately 80-to-90-feet in height as compared to the approximately 34-to-48-foot-height of the existing facilities. Alternative 3 would also require a 95-foot-tall riser pole at the transition from overhead to underground on Indian Canyon. In contrast, the Proposed Project between Farrell-Garnet would be constructed by replacing/reconfiguring existing overhead subtransmission facilities.
Alternative 5: The Alternative 5 route would consist of approximately 3.1 miles of underground facilities along Varner Road, Monterey Avenue, and Ramon Road into the Mirage Substation. In comparison, the Proposed Project would require only 1.5 miles of reconfiguration on existing subtransmission overhead facilities, adjacent to existing access roads.

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environmentally superior alternative is based on *differences in intensity and type of impacts that would be less than significant with mitigation*." (DEIR, p. 5-3, emphasis added.) The DEIR further states that for several resources "there are *no material environmental impact differences between the Proposed Project and alternatives* including : agricultural resources; air quality; geology and soils; hazards and hazardous materials; hydrology and water quality; land use, planning and policies; mineral resources; noise; population and housing; public services; recreation; and utilities and service systems." (DEIR, p. 5-3, emphasis added.)

Even though the DEIR states that (1)Alternatives 3and 5 have greater air quality impacts than the Proposed Project; (2) the Proposed Project has the least traffic impacts compared to either Alternative 3 or 5; and that (3) there are *no* material differences between environmental impacts of the Proposed Project and Alternatives 3 and 5, the DEIR nevertheless concludes that Alternatives 3 and 5,[2] as compared to the Proposed Project, will result in fewer *already less than significant impacts*, and are thus environmentally superior. Specifically, the DEIR asserts that Alternative 3 would result in fewer long-term aesthetics and biological impacts[3] and that Alternative 5 would result in less-intense, less-than-significant long-term impacts as compared to the Proposed Project in the areas of aesthetics, biological resources, and cultural resources.

O2-a cont.

SCE disagrees with this analysis and with the selection of Alternatives 3 and 5 as the environmentally superior routes. SCE believes that a review of the differences in intensity and type of impacts that would be less than significant with mitigation reveals that the Proposed Project does not result in more long-term, less than significant impacts and also reveals that the Proposed Project should be selected as the environmentally superior route. In addition to these reasons, SCE believes that the Proposed Project should be approved by the California Public Utilities Commission (CPUC) for construction because it is also $20-24 million dollars *less costly* for ratepayers than Alternatives 3 and 5.

SCE's Proposed Project does *not* result in more long-term, less-than-significant impacts as compared to Alternatives 3 and 5.

As stated above, the DEIR asserts that, as compared to the Proposed Project, Alternative 3 would result in fewer long-term less-than-significant aesthetics and biological impacts and that Alternative 5 would result in fewer long-term less-than-significant impacts in the areas of aesthetics, biological resources, and cultural resources. SCE disagrees with these assertions.

Aesthetics

- For Alternative 3, the new overhead line would be constructed along Indian Canyon Drive, where there are only existing distribution lines but no existing subtransmission

O2-b

[2] The DEIR selected Alternative 3 for the Farrell-Garnett portion of the route and Alternative 5 for the Mirage-Santa Rosa portion of the route. (DEIR, p. 5-10.)
[3] Note that the DEIR states that Alternative 7 would have fewer cultural impacts than either Alternative 3 or the Proposed Project, but due to the length of the line, Alternative 3 was chosen as the environmentally superior alternative for the Farrell-Garnet study area. (DEIR, p. 5-10.)

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line. According to the DEIR, Alternative 3 would require removing existing distribution facilities on wooden poles that are approximately 34-to-48-feet high and installing approximately 96 new LWS poles and 10 TSP structures, approximately 80-to-98-feet high and a 95-foot-tall-riser pole. However, construction of the overhead portion of Alternative 3 might require the use of single circuit TSPs due to the number of distribution circuits that would be installed on these facilities. Also, Indian Canyon Drive is the main entrance into Palm Springs, and therefore viewers from the road would be visually sensitive. There is also a neighborhood bordering Indian Canyon Drive that would be able to see the new subtransmission conductor and the new 95-foot-tall riser pole.

In contrast, the Proposed Project would likely result in fewer long-term visual impacts because the new facilities would be constructed within an existing corridor, replacing an existing subtransmission line on similar facilities. Since the Proposed Project would be collocated with an existing subtransmission line with similar visual elements, contrast, or discernable change to the landscape, would be substantially less when compared to Alternative 3, where the project would be constructed immediately adjacent to Indian Canyon Drive overbuilt above a smaller scale distribution line. Therefore, the construction and operation of Alternative 3 may result in substantially more long-term, less-than-significant visual impacts when compared to the Proposed Project.

- With Alternative 5, there would be two new 95-foot-tall-riser poles, one inside of Mirage Substation and one at the intersection of Varner Road and Vista De Oro. (DEIR, p. 3-22.)
- In contrast to Alternatives 3 and 5, where Alternative 3 would result in new, larger structures close to a major road and neighborhood and Alternative 5 that would include construction of two 95-foot riser poles, the Proposed Project would rebuild/reconfigure existing lines on the Farrell-Garnet and the Mirage-Santa Rosa portions. Both of these areas of the Proposed Project have existing SCE subtransmission lines that SCE would rebuild/reconfigure and then string a new set of conductors on. In other words, it would be very difficult to tell the difference between pre- and post- project visual conditions for a majority of the Proposed Project. It is therefore, SCE's belief that the Proposed Project would *not* result in more long-term less-than significant impacts as compared to Alternatives 3 and 5, but in fact, could result in *fewer*.

O2-b cont.

Biological Resources

- The DEIR concludes that Alternatives 3 and 5 would result in fewer long-term less than significant impacts as compared to the Proposed Project. Alternative 3 contains potential habitat for the fringe-toed lizard, but surveys did not find the area occupied. However, Alternative 3 would still require mitigation for loss of habitat, but, like the Proposed Project in this area, would also be less than significant. Further, if Alternative 3 were approved for construction, the existing line traversing BLM would remain, and SCE would need to still maintain the line and replace deteriorated poles; a few of these poles

O2-c

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would likely need to be replaced in the near future.[4]

The Proposed Project along the Farrell-Garnet portion of the route traversing Bureau of Land Management (BLM) land is confirmed that it is occupied for fringe-toed lizard; however, all impacts would be less than significant with mitigation, and the actual impact would be primarily construction-related rather than long-term. For the Proposed Project, SCE would be replacing poles in areas that poles already exist. Further, the replacement of poles would take place in areas alongside an existing road where the habitat is already somewhat degraded. For these reasons, SCE does not believe that the Proposed Project would result in more long-term biological resources as compared to Alternative 3.

- The DEIR concludes that because Alternative 5 would result in only a short span of overhead line across I-10 and the UPRR, compared to the Proposed Project Mirage-Santa Rosa line, which would include approximately 1.5 miles of overhead line, Alternative 5 is more favorable than the Proposed Project Mirage-Santa Rosa line for biological impacts. (DEIR, p. 5-9.) However, both options, Alternative 5 and the Proposed Project, have very limited biological impacts that are less-than-significant. For these reasons, SCE does not believe that the Proposed Project would result in more long-term biological resources as compared to Alternative 5.

O2-c cont.

Cultural Resources

- The Proposed Project Farrell-Garnet 115kV line would be built in the existing alignment of the Devers-Farrell-Wildland 115kV subtransmission line along the north side of Garnet Hill. The line is currently in an existing easement which is at least 30-feet wide. SCE would utilize an existing access road already in place. No new roads would need to be cut through Garnet Hill and any necessary grading would be minimal. The Proposed Farrell-Garnet overhead line would have point-specific paleontology impacts and non-physical impact on Native American topographical resource Hoon wit ten ca va /Garnet Hill.

  Similarly, the overhead segment of Alternative 3 would also have point-specific paleontology impacts where poles would be located and non-physical impact on Native American topographical resource Hoon wit ten ca va /Garnet Hill . Further, the underground segment would have greater paleontological impacts and possibly archaeological impacts to currently unknown resources than the overhead Farrell-Garnet line because Alternative 3 involves a trench that would potentially intrude below existing disturbed areas. In addition, Alternative 3 would still require SCE to install poles through a portion of the Garnet Hill in areas where new access roads may be required. For this reason, the DEIR states that the "ranking for the Farrell-Garnet study area (most to least

O2-d

[4] SCE has been in the process for the past few years of working with BLM to obtain necessary environmental approvals. Please note that if Alternative 3 is approved for construction, it could result in a delay in this process, as BLM would no longer be involved in the project.

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favorable) is as follows: Alternative 7, Alternative 6, Alternative 3, the Proposed Project Farell-Garnet line, and Alternative 2." (DEIR, p. 5-9.)

- With the exception of two locations, the Proposed Mirage-Santa Rosa line would be built in the existing Mirage-Tamarisk 115kV and/or the existing Mirage-Concho 115kV alignments.[5] The Proposed Mirage-Santa Rosa line would have point specific paleontological impacts where poles would be located and physical impacts to one archaeological site (CACRV 785). Sites 33-15430 and 33-15429 might be avoidable or could potentially not be impacted by the Proposed Project. Alternative 5, in contrast, would have physical impacts on Varner Road, cultural resource 33-8408, due to linear trenching within the length of roadway. Alternative 5 would also result in potentially greater paleontological impacts and possibly archaeological impacts to currently unknown resources due to the trenching required for the 3.1 miles of undergrounding that might intrude below currently disturbed areas. Therefore, it is not likely that the Proposed Project would have more long-term, less-than-significant impacts as compared to Alternative 5, and could result in *fewer* long-term impacts. (DEIR, pp. 5-6, 5-9.)

O2-d cont.

In sum, the DEIR asserts that one of the main reasons Alternatives 3 and 5 were chosen over the Proposed Project as environmentally superior, is due to increased long-term, less-than-significant impacts of the Proposed Project as compared to Alternatives 3 and 5, particularly in the areas of aesthetics, biological resources, and cultural resources. As discussed above, SCE disagrees with this determination. The Proposed Project would result in very similar or even *fewer* long-term visual/aesthetics impacts; similar long-term biological impacts, and similar or potentially *fewer* long-term cultural impacts. In any event, *all* of these impacts are *less-than-significant* and the minute differences between them do not justify the choice of Alternatives 3 and 5 environmentally superior.

O2-e

SCE's Proposed Project is the environmentally superior routing option because it is less impactful than Alternatives 3 and 5 in several resource areas.

Air Quality

- The DEIR acknowledges that the Proposed Project would have fewer significant air quality impacts than Alternatives 3 and 5 due to the extensive trenching required for Alternatives 3 and 5, yet the DEIR concludes this difference is "not material enough to determine a preferred alternative from an air quality perspective" and concludes that there is "no preference" between the Proposed Project and Alternatives 3 and 5 regarding air quality impacts. (DEIR, pp. 5-9 and 5-4.) SCE disagrees with this analysis and believes that there is a difference material enough to determine that the Proposed Project is the preferred alternative regarding air quality.

O2-f

[5] Exception 1: a new single circuit pole line will be built west of the existing Mirage-Concho 115kV line adjacent to an existing access road and further west of the culturally sensitive areas adjacent to the existing Mirage-Concho 115kV line. Exception 2: a new single circuit wood pole line would be built east of the existing double circuit wood pole line through the Tri-Palms Estates Country Club. No cultural resources appear to be within the golf course as it is on developed property.

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- The 5.8 miles of overhead line that would be constructed for the Proposed Farrell-Garnet line would result in approximately 116,790 cubic feet of ground disturbance.[6] In contrast, the 3.6 miles of underground construction and 2.9 of overhead construction required for Alternative 3 would result in approximately 320, 288 cubic feet of disturbance, nearly *three times* the disturbance of the Proposed Farrell-Garnet line, with correlating increases in fugitive dust.[7] This is material enough in SCE's opinion to determine that the Proposed Farrell-Garnet line is superior to Alternative 3.
- The 1.5 miles of overhead line that would be constructed for the Proposed Mirage-Santa Rosa line would result in only 5,633 cubic feet of disturbance, due in part to this portion being constructed on existing alignments, and no new access roads would be required.[8] In contrast, the 3-foot-wide, at least 5.5-foot-deep, 3.1-mile long trench that would be required for Alternative 5 would result in a total of 270,072 cubic feet of land disturbance, approximately *48 times* the disturbance and corresponding fugitive dust impacts as compared to the Proposed Project.[9] In SCE's opinion, this is a material-enough difference in disturbance area to determine that the Proposed Mirage-Santa Rosa line is superior to Alternative 5.

O2-f cont.

Noise

- Construction of underground facilities requires approximately 100-days per mile to complete. In comparison, construction of overhead facilities requires approximately 30-days-per mile to complete. Thus, the estimated construction time for the Proposed Farrell-Garnet line would be approximately 6 months (roughly one month per mile on a total of approximately 5.8 mile-long route).

  In contrast, the construction of Alternative 3 would be approximately 100 days per mile of undergrounding, which would be about 360 days, or approximately one year. The overhead portion of Alternative 3 would take approximately 3 months construction time, which could possibly be performed in parallel with the underground construction work. Similarly, the estimated construction time for the Proposed Mirage-Santa Rosa line would also be less than Alternative 5. The 1.5-mile-long Proposed Mirage-Santa Rosa line would take approximately 1.5 months to construct, while the construction of Alternative 5 would be approximately 10 months (roughly 100 days per mile for 3.1

O2-g

[6] Calculations for volume of earth disturbed are back-of-the-envelope estimates used to demonstrate quantitative differences in earth disturbance. For the Proposed Farrell-Garnet line: 142 LWS poles x area disturbance (πr^2; where r= 1 foot) x depth of disturbance = 10ft; disturbed volume = 4460ft^3; 15 TSPs x πr^2 (r=2.5 ft) x 30 ft deep= 8840 ft^3; 0.7 miles access road x 5280 x 14 ft wide x 2 ft deep= 103490 ft^3; Total Volume Disturbed= 116790 ft^3.

[7] Disturbance calculations for Alternative 3: 3 ft wide underground trench x 5.5 feet deep x 3.6 miles x 5280 = 313632 ft^3; 2.90 miles overhead= ½ disturbance of 5.8 miles of proposed overhead without access road= 6650 ft^3; Total Disturbance= 320288 ft^3.

[8] Disturbance calculations for Proposed Mirage-Santa Rosa: 37 LWS + 11 wood poles x area of disturbance x depth of disturbance= 10ft; Disturbed volume = 1508 ft^3;7 TSPs x πr^2 (r=2.5ft) x 30 ft deep= 4125 ft^3; 0.0 new access roads; Total Disturbance= 5633 ft^3.

[9] Disturbance calculations for Alternative 5: 3 ft wide underground trench x 5.5 ft deep x 3.1 miles x 5280=270072 ft^3.

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miles underground construction). In other words, construction of Alternatives 3 and 5 would require significantly longer construction times than the Proposed Project.

- The DEIR acknowledges that "underground portions would have greater noise and vibration impacts from construction" and asserts that Alternatives 3 and 5 would result in "less impacts from corona noise." (DEIR, p. 5-7.) First, SCE agrees that the underground portions would result in greater noise and vibration from construction and would like to reiterate that these portions would take a 100-days-per-mile to construct, compared to a lesser construction period for the Proposed Project. Second, as acknowledged in the DEIR regarding the overhead construction associated with the Proposed Project, "because newer conductors typically have less surface imperfections than aging conductors, the conductors associated with the new circuit would likely result in lower corona noise levels than the existing circuit."[10] (DEIR, p. 4.11-16.) Further, the DEIR states that in any event, most sensitive receptors for the Proposed Project are between 100-to-150-feet away from the proposed alignment. (DEIR, p. 4.11-16.) Finally, the DEIR concludes that corona noise impacts of the Proposed Project would be a less-than-significant impact and *no mitigation is required*. (DEIR, p. 4.11-17.) SCE, therefore, disagrees with the conclusion in the DEIR that there is no preference between the alternatives regarding noise impacts. Because of the greater noise impacts from underground construction, the increased construction related to underground routing, because the Proposed Project would likely result in *lower* corona noise levels as compared to the existing baseline and because most sensitive receptors to the Proposed Project are *at least* 100-feet away from the alignment, SCE concludes that the Proposed Project should be the preferred route regarding noise impacts.

O2-g cont.

Public Services

- The DEIR acknowledges that the "additional lane closure required for the underground portion[s of Alternatives 3 and 5] could lead to slightly higher impacts to emergency response times." (DEIR, p. 5-8.) The DEIR nonetheless concludes that there is no preference between alternatives for public service impacts. SCE disagrees with this conclusion and believes that due to the additional potential for disruption to public services from extensive, prolonged road/lane closures, even though these impacts would remain less than significant, the Proposed Project is superior to Alternatives 3 and 5 in this area.

O2-h

Traffic and Transportation

- The DEIR acknowledges that as "[c]ompared to the alternative lines, the Proposed Project lines would involve the least amount of construction work within or above roads. Compared to the Proposed Project Farrell-Garnet line, Alternative 3 would result in the *most* amount of underground line construction within roads" and that as "[c]ompared to the Proposed Project Mirage-Santa Rosa line, which would result in no underground line

O2-i

[10] Please note that the noise level analysis for corona noise may be assuming corona noise levels for 220 kV facilities rather than levels for 115 kV facilities, which are normally less.

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work, Alternative 5 would result in approximately three miles of underground line." (DEIR, pp.5-9 to 5-10.) Therefore, the DEIR concludes that the Proposed Project is more favorable than either Alternative 3 or 5. SCE agrees and believes that this is an additional reason that the Proposed Project is the environmentally superior alignment.

Alternatives 3 and 5 would require significantly more traffic control measures than the Proposed Project does. Both Alternatives 3 and 5 would require various lane closures for the duration of the underground portions, approximately 12 months for Alternative 3 and 10 months for Alternative 5. The lane closures associated with Alternative 3 may affect access for nearby residential area. Additionally, the route along Alternative 5 has been recently widened by the County of Riverside and may be subject to a moratorium on any street projects for five years. In order for SCE to be able to obtain permission to install the underground system along this portion of the route, it is possible that SCE may be required to grind and recap the entire street from curb to curb. Also, SCE would need to update information regarding buried utilities/services in order to determine where, if at all, the underground facilities could be placed. It is possible that additional services have been recently added to this area (e.g., potential water line along Monterey). This could result in a non-linear pattern of undergrounding, with corresponding lane/road closures, or the potential that the underground portions would need to be trenched deeper than expected, or, worst-case, that there might not be room for the underground facilities in some areas due to constraints of existing underground utilities/services.

O2-i cont.

In comparison, a portion of the Proposed Farrell-Garnet line might require a two-week lane closure, but would be intermittent and would not disturb road service; other portions of the Proposed Farrell-Garnet line are on access roads or off major roadways and would not require lane closures. Similarly, the Proposed Mirage-Santa Rosa line would result in temporary road closures and limited lane closures, but would not disturb roads themselves.

Utilities and Service Systems

- The DEIR determines that impacts to Utilities and Service Systems for Alternatives 3 and 5 are "similar to the Proposed Project" and that there is no preference between Alternatives 3 and 5 as compared to the Proposed Project. SCE disagrees with this conclusion. Because Alternatives 3 and 5 both require construction of substantial underground portions, approximately 6.7 miles total undergrounding for both alternatives, a greater potential for hitting, disrupting utilities and service systems exist than compared to the Proposed Project. In order to avoid existing underground utilities when trenching, SCE might be required to construct deeper trenches, which would likely increase air impacts as well. In comparison, the Proposed Project, with no underground portions, would be less likely to disrupt utilities and service systems. Thus, SCE believes that the Proposed Project is superior to Alternatives 3 and 5 in this resource area as well.

O2-j

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Alternatives 3 and 5 would cost approximately *five times more* than SCE's Proposed Project.

The overhead portions of the Proposed Project would cost approximately $627,000 dollars per mile.[11] For the Proposed Farrell-Garnet line and the Proposed Mirage-Santa Rosa line, this would result in approximately $4.5 million dollars total for these overhead portions of the project.[12]

In comparison, the approximate cost for undergrounding is $3.5 million per mile. The cost for Alternatives 3 and 5 would be approximately $25-28 million. [13] In addition to these costs, there are possible moratoriums in place on roads that have been recently repaved, such as Monterey Road. If such moratoriums are in place at the time SCE would need to construct in those areas, it is possible that SCE would be required to repave the *entire* road from curb-to-curb, rather than just repaving the trenching area. This could result in additional cost to the project. In sum, Alternatives 3 and 5 would cost at least approximately *five times more* (between $20-24 million dollars) than the Proposed Project and, as discussed above, would not result in *any* material environmental benefits as compared to the Proposed Project. O2-k

In conclusion, the Proposed Project does *not* result in more long-term, less-than-significant impacts as compared to Alternatives 3 and 5, and in fact, likely results in *fewer* long-term impacts in the areas of aesthetics and cultural resources. Further, the Proposed Project is environmentally superior to Alternatives 3 and 5 in the areas of air quality, noise, public services, traffic and transportation, and utilities and service systems. Finally, the cost of the Proposed Project is approximately $20-24 million dollars less than that of Alternatives 3 and 5.

For all of these reasons, SCE believes that the differences in intensity and type of impacts that would be less than significant justify choosing the Proposed Project as the environmentally superior and approving the Proposed Project for construction. O2-l

Sincerely,
/s/Milissa Marona
Milissa Marona

[11] Please note that these cost estimates are conceptual estimates without the benefit of final engineering.
[12] Approximate cost calculations for the Proposed Project. For the Proposed Farrell-Garnet line (5.8 miles of overhead x $627,000 per mile = $3.6 million). For the Proposed Mirage-Santa Rosa line (1.5 miles of overhead x $627,000 per mile = $940,500). The total for the overhead portions of the Proposed Project would be $3.6 million + $940,500= $4.5 million.
[13] Approximate cost calculations for Alternatives 3 and 5: Alternative 3 (2.9 miles of overhead (between $2million and $5 million per mile [depending on final engineering] + 3.6 miles of underground x $3.5 million per mile=range between $14 million and $18 million). Alternative 5 (3.1 miles of underground x $3.5 million per mile= $10.8 million). For Alternative 3 ($14-18 million) and Alternative 5 ($10.8 million) the total cost for the undergrounding portion would be a range between $25 million and $28 million. Therefore, Alternatives 3 and 5 would cost approximately 5 times more than the Proposed Project, approximately $20-24 dollars more.

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Comment Number	Page Number	Comment	Suggested Revision	
General				
1		For resource chapters that include discussion of local plans, policies, ordinances, etc., please include the GO 131-D preemption language as well (e.g. Air Quality, Cultural, etc).	General Order 131-D clarifies that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters. In instances where the public utilities and local agencies are unable to resolve their differences, the Commission shall set a hearing no later than 30 days after the utility or local agency has notified the Commission of the inability to reach agreement on land use matters.	O2-1
Executive Summary				
2	ES-1	The proposed project includes seven 115 kV reconfigurations rather than three. Please revise the first sentence under ES.1.1 to clarify this fact and to clarify line types.	The Proposed Project consists of a number of distinct project components that together make up the entire Proposed Project, including two new 115 kV subtransmission lines, ~~three~~ seven 115 kV subtransmission line reconfigurations, a 220 kV transmission line loop-in, substation modifications….	O2-2

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Comment Number	Page Number	Comment	Suggested Revision	
3	ES-9/Fig. ES-2	The figure shows Alternative 3 stopping where it meets Alternative 2. The figure should depict Alternative 3 turning along Alternative 2 and running adjacent to it until it reaches the Farrell Substation icon.	Please amend Figure ES-2 to reflect the fact that Alternative 3 continues into Farrell substation.	O2-3
4	ES-4	Originally it was thought that five new circuit breakers would be needed to accommodate a new line position. However, a more efficient configuration has been incorporated into the design and instead of five circuit breakers, only three will be needed. Please revise the language under Mirage Substation to reflect this configuration.	• Install five new 220kV circuit breakers and ~~five~~ three new 115kV circuit breakers	O2-4
5	ES-5	In order to provide a more detailed explanation of the work at Santa Rosa Substation and to be consistent with other substation descriptions, please replace the first bullet under Santa Rosa substation with the two bullets provided.	• Convert the existing Santa Rosa-Garnet 115 kV subtransmission line to the new Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line • Convert the existing Santa Rosa-Tamarisk 115 kV subtransmission line to the new Mirage-Santa Rosa 115kV subtransmission line	O2-5

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6	ES-5	In order to provide a more detailed explanation of the work at Thornhill Substation and to be consistent with other substation descriptions, please replace the first bullet under Thornhill substation with the bullet provided.	• Convert the existing Thornhill-Tamarisk 115kV subtransmission line to the new Devers-Eisenhower-Thornhill 115kV subtransmission line	O2-6
7	ES-4	More extensive engineering has indicated that work at the Mirage Substation should include the relocation of the Mirage-Tamarisk line. Therefore, please amend the bulleted text as shown.	• Install the new Mirage- Santa Rosa 115 kV subtransmission line and relocate the Mirage-Concho <u>and Mirage-Tamarisk</u> 115 kV subtransmission line<u>s</u>	O2-7
8	ES-22	Please revise the Executive Summary to reflect the potential impacts to paleontological, cultural, and archaeological resources due to undergrounding.	• Please see Attachment 1, Cultural Comparison Table.	O2-8
Introduction				

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Comment Number	Page Number	Comment	Suggested Revision	
9	1-2/1.2	The work alluded to regarding Devers-Capwind- Concho-Mirage on page 2-2 of the PEA was conducted in 2008 when the Devers-Capwind-Concho Mirage line was looped in to Mirage . Therefore, please amend the text in the first paragraph, third sentence, as shown to reflect the name change that results from the previous work.	Splitting the existing 115 kV system is necessary to relieve thermal overload conditions on the ~~existing~~ Mirage-Concho ~~leg of the Devers-Capwind-Concho-Mirage~~ 115 kV and Mirage-Tamarisk 115 kV subtransmission lines ~~and the Mirage-Tamarisk 115kV subtransmission line."~~	O2-9
Project Description				
10	2-13/ Bullet 2	As a result of more extensive engineering, grounding location was changed. Therefore, please revise the second bullet as follows:	• Split the Santa Rosa-Tamarisk at the same intersection by dead-ending and grounding the Santa Rosa leg at the ~~northwest~~ southeast corner pole. The portion of the Santa Rosa-Tamarisk line between Bob Hope Drive east to Portola Avenue would become idle.	O2-10
11	2-13/ Bullet 3	As a result of more extensive engineering, pole configuration has been changed. Therefore, please revise the third bullet as follows:	Connect the open Tamarisk leg of the existing Santa Rosa-Tamarisk 115 kV subtransmission line to the open Garnet leg of the existing Garnet-Santa Rosa 115 kV subtransmission line at the ~~northeast~~ southeast corner pole of Bob Hope Drive and Dinah Shore Drive.	O2-11

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Comment Number	Page Number	Comment	Suggested Revision	
12	2-13/ Bullet 1	As a result of more extensive engineering and to enhance the appearance of the pole, the pole configuration was changed. Therefore, please revise the first bullet as follows:	• Split the existing Garnet-Santa Rosa 115 kV subtransmission line at the intersection of Bob Hope Drive and Dinah Shore Drive by removing the span of wire that connects the southwest and northeast corner poles <u>and transfer it to the southeast corner pole</u> (see Figure 2-5, Existing and Proposed 115 kV Line Configurations at Bob Hope and Dinah Shore Drives).	O2-12
13	2-14/ Fig. 2-5	Based on updated engineering information, please change proposed conductor configuration to look like the attached drawing:	See Attachment 2, Updated Subtransmission Line Configurations	O2-13
14	2-18/ Bullet 1	Based on updated engineering information, please revise bullet to the following: "…at the southeast corner…"	"Install a span of conductor between the existing north segment of the Garnet-Santa Rosa 115 kV subtransmission line and the existing west segment of the Santa Rosa-Tamarisk 115 kV subtransmission line at the ~~northwest~~ <u>southeast</u> corner of Bob Hope Drive and Dinah Shore Drive."	O2-14
15	2-21/ Fig. 2-8	Based on updated engineering information, please change Figure 2-8 to the attached figure:	See Attachment 3, Bob Hope Dr. TSP Profile	O2-15

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Comment Number	Page Number	Comment	Suggested Revision	
16	2-22/ 3rd Paragraph 2nd line	Depending on soil conditions, footings may extend up to 40 feet deep. Therefore please revise text in the third paragraph to be consistent with language elsewhere in the document :	The TSPs would be installed on top of cylindrical concrete footings approximately six to eight feet in diameter and ~~approximately 20 to 25~~ at least 22 feet deep.	O2-16
17	2-22/ 4th Paragraph	The PEA incorrectly describes the assembly method. Edison's assembly method for LWS poles and TSPs is as follows. Please replace the fourth paragraph, after the second sentence, with the following text:	While on the ground the top and bottom sections of the LWS poles would be pulled together and preconfigured with the necessary insulators and wire stringing hardware. For LWS poles a line truck with a boom on it, would be used to position each pole into previously augured holes. The TSPs will require a crane to set the pole bases on top of previously installed concrete foundations. Once secured the top and, if necessary middle, sections of the TSP will then be set on the base of the TSP. For both structures, all sections may be spot welded together for added stability.	O2-17

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Comment Number	Page Number	Comment	Suggested Revision	
18	2-23/ Conductor Pulling Paragraph 1	Neither crossarms nor suspension assemblies will be utilized, except on TSPs. Therefore, please revise the text in the first paragraph under Conductor Pulling as follows:	~~Conductors would be installed on 115 kV polymer insulator assemblies attached to each crossarm in a horizontal configuration or suspension assemblies consisting of single polymer insulators attached to each crossarm in a vertical configuration. Overhead ground wires would be installed on the top of the steel poles.~~ Conductors would be attached to 115kV polymer post style insulators which are attached to each pole head for LWS poles, and suspended, or dead ended, to steel crossarms mounted on TSPs. Depending on location, the insulator configurations may be mounted vertically, or in a triangular pattern. With the exception of certain locations near substations, the overhead ground wire would be installed in accordance with G.O. 95 Table II. Distribution lines transferred to the new steel poles would typically be installed on standard wood crossarms with polymer insulators.	O2-18
19	2-23/ Conductor Pulling Paragraph 2	Vibration dampeners or weights will not be utilized because the spans are not long enough and construction does not call for it. Therefore, please revise the text in the second paragraph under Conductor Pulling as follows:	Conductor pulling includes all activities associated with the installation of conductors onto the LWS and wood poles and TSPs. These activities include installing three 115 kV 954 SAC conductors, one 221 kcmil ACSR ground conductor, ~~ground wire, vibration dampeners, weights, and~~ post, suspension ~~and~~ or dead-end hardware assemblies for the entire length of the proposed subtransmission lines.	O2-19

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Comment Number	Page Number	Comment	Suggested Revision	
20	2-41	Please revise the first paragraph to include additional detail.	Devers Substation is staffed, 500/220/115 kV substation located in the unincorporated area of Riverside County, north of the City of Palm Springs. The proposed improvements at Devers Substation include the conversion of Devers-Mirage 220 kV transmission line to Devers-Mirage No. 1 220kV transmission line and reconfiguration of the Coachella Valley-Devers 220 kV transmission line to the Devers-Mirage No 2 220kV transmission line and relay upgrades, replacement of two ……	O2-20
21	2-41	Kiloannum is not the correct term; therefore, please revise the first bulleted text as follows:	• Four 115 kV 1,200 Amp., 40 ~~kiloannum~~ kilo Amperes (kA) duty, breakers	O2-21
22	2-42	The existing language refers to installation of one breaker and-a-half configuration position for two new lines; however, the project consists of relocating two existing lines to this new position. Therefore, please revise the text under Engineering Plan, second sentence, as follows:	The proposed improvements at Mirage Substation include the installation of one 280 MVA, 220/115 KV transformer bank, one new 220 KV bank position, one new 115 KV bank position, and one new 220 KV breaker-and-a-half configuration position ~~for two new 220 kV line positions,~~ and the relocation of the existing Mirage Ramon 220 kV transmission line.	O2-22

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Comment Number	Page Number	Comment	Suggested Revision
23	2-42	Please revise the last sentence of the same paragraph (see comment above) to include further detail now available.	…relocation of existing Mirage-Concho 115 KV subtransmission line, renaming the existing Mirage-Capwind- Devers 115 kV subtransmission line to Mirage-Capwind-Tamarisk-Devers 115 kV subtransmission line, renaming the Mirage-Concho 115 kV subtransmission line to Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line, and installation of new protection relays.

O2-23

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Comment Number	Page Number	Comment	Suggested Revision
24	2-42	Originally it was thought that five new 115 kV circuit breakers would be needed to accommodate a new line position. However, a more efficient configuration has been incorporated into the design. Therefore, instead of five circuit breakers, only three will be needed. Additionally, further detail is available regarding the 220 kV equipment and is reflected in the language provided. Please revise the text as follows:	• One 280 MVA 220/115 kV transformer bank; • Five 220 kV, 3,000 amp, 50 KA duty, circuit breakers; • Ten 220 kV 3,000 amp, center-side-break disconnect switches; • ~~Fifteen~~ Eighteen 220 kV station post insulators; • ~~Six 220 kV metering potential transformers;~~ Three 220 kV coupling capacitor voltage transformers; • Three 220 kV metering units • Two 115 kV, 3,000 amp, 40 KA duty circuit breaker; • ~~Three~~ One 115 kV, 2,000 amp, 40 KA duty circuit breaker; • Four 115 kV, 3,000 amp, center-side-break disconnect switches; • ~~Six~~ Two 115 KV, 2,000 amp, Center-side-break disconnect switches; • ~~Nine~~ Six 115 KV, potential transformer; and • ~~Twenty-seven~~ Twelve 115 KV post insulators.

O2-24

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Comment Number	Page Number	Comment	Suggested Revision	
25	2-42	As a result of more extensive engineering, more detailed switchrack configuration is available. Please revise the text under Major Equipment, inserting text after the second bullet under Switchrack Configurations as follows:	• Renaming the Devers-Mirage 220 kV transmission line to Devers-Mirage No. 1 transmission line	O2-25
26	2-43	As a result of more extensive engineering, more detailed switchrack configuration is available. Therefore, please revise the text under Major Equipment on page 2-42 as follows: (Insert after the first bullet on Page 2-43)	• <u>Existing Tamarisk 115 kV subtransmission line would be relocated to line position 1N to create the Devers-Capwind-Mirage-Tamarisk 115 kV subtransmission line</u> • <u>Vacated existing line position No. 1S would be for the new Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line</u>	O2-26

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Comment Number	Page Number	Comment	Suggested Revision	
27	2-43	More extensive engineering resulted in a determination that the line position referenced in the third bullet on page 2-43 is no longer necessary. Additionally, more detailed project information is available. Please revise the text to include these specifics.	• ~~"One new 115KV line position (No. 7N) designed with double-breaker configuration"; and added the transformer bank".~~ • Convert existing 115 kV line position (No. 4) from double-breaker configuration to a breaker-and-a-half configuration <u>for relocated Concho 115 kV line Position (No. 4S) and new Santa Rosa 115 kV line Position (No. 4N)</u> • <u>Install one 220/115 kV transformer bank</u>	O2-27
28	2-59	Because IID's equipment and circuit installation location is not certain, we recommend utilizing original language provided in the PEA.	IID equipment and circuit installation ~~would occur at~~ <u>is expected to be in</u> IID's mechanical-electrical equipment room (MEER)	O2-28
29	2-60	Typographical correction: Table 2-7, Indian Wells, Equipment/Circuit Installation, change the value in the <u>number of days column</u>	Change "35" to "5"	O2-29

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Comment Number	Page Number	Comment	Suggested Revision	
30	2-62	Wrong notation for the appendix-"Additional information on electric and magnetic fields generated by transmission lines is presented in Appendix D."	Change to: "Appendix **B**"	O2-30
31	2-62	Additional research organization should be added-"Most recently the International Agency for Research on Cancer (IARC)…"	Change to: Consider revision-"Most recently the **World Health Organization (WHO)**, International Agency for Research on Cancer (IARC)…"	O2-31
Alternatives and Cumulative Projects				
32	3-13/ 3.4.2	Due to FAA regulations it will be necessary for the riser pole referenced in the first paragraph, second sentence, to be set further north. Therefore, please revise the text in the first paragraph as follows:	At Sunrise Way, the line would turn north, and proceed along Sunrise Way to <u>approximately 1,265 feet north of</u> Four Seasons Blvd, where the underground segment would end and the subtransmission line would transition to overhead at a riser pole…	O2-32
Aesthetics				
33	4.1-44	SCE is concerned that a 90-day review and approval period could have negative impacts on schedule. Please revise to reduce review and approval period to 30 days.	"….a Construction Lighting Mitigation Plan to the CPUC for review and approval at least ~~90~~ <u>30</u> days prior to the start of nighttime construction or	O2-33

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Comment Number	Page Number	Comment	Suggested Revision	
34	4.1-46	To allow for other methods of glare reduction, please revise Mitigation Measure 4.1-8 as indicated.	~~"A non-reflective or weathered finish shall be applied to all new structures and equipment install at….."~~ All new structures and equipment shall be non-specular (reduced glare) to the degree feasible. Please note: some equipment may not be available in non-specular finish.	O2-34
35	4.1-2	Please include a description of Indian Canyon Drive in the local Major Roadways section.	Indian Canyon Drive is an existing north-south roadway into Palm Springs with access from/to the I-10. Views from this roadway include open space and the San Jacinto Mountains.	O2-35
36	4.1-4	Desert Highland Park, located approximately .5 mile west of Alternative 3 may have direct and unobstructed views of the proposed structures along Indian Canyon Road.	Please address affects to this sensitive viewing location and update route comparison	O2-36
37	Figure 4.1-1	Map clarification needed.	Please label SR 111 (Vista Chino); Add symbology that indicates the underground portions; offset the alternatives so that the reader can tell where they overlap instead of just seeing the top most layer.	O2-37
Air Quality				

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38	4.3-37	SCE concurs with the statement on page 4-37 that "the SCAQMD's method is the best available method to determine GHG significance associated with the Proposed Project". The South Coast AQMD has drafted their air quality guidelines to be consistent with AB 32. However, the DEIR does not follow the SCAQMD methodology. The SCAQMD methodology is a 5 tier system, each tier represents a progressively more difficult pass/fail significance test. Tier 3 is a comparison of the project's GHG emissions with numeric thresholds. If the emissions do not exceed the thresholds then the project is considered to be less than significant. If the emissions exceed the threshold then the methodology requires a Tier 4 evaluation that includes a "business as usual" analysis. The CPUC concluded that the Proposed Project emissions would be "substantially less" than the numeric	Please delete the last paragraph on page 4.3-37 and replace with "The annualized GHG emissions associated with the Proposed Project would be substantially less than the SCAQMD Tier 3 thresholds or CARB's preliminary draft thresholds" and delete Mitigation Measure 4.3-6.

O2-38

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38 (cont).		thresholds but then continued to conduct a "business as usual" analysis. The SCAQMD methodology clearly states that if the Tier3 thresholds are met then the project is less than significant. Therefore, no mitigation is required.		O2-38 cont.
Biological Resources				
39	4.4.10	The fourth column of Table 4.4.1 should also say that the proposed project area is well away (more than 5 miles) from the proposed critical habitat for the Casey June Beetle.	Please add under the fourth column under Casey's June beetle that "the proposed critical habitat for the Casey June Beetle is approximately 5 miles away".	O2-39
40	4.4.11	The flat-tailed horned lizard status has recently been changed to a Federal Candidate Endangered Species. Table 4.4.1 and the discussion for the species does not indicate its change in status.	Please add FCE to the second column.	O2-40
41	4.4.15	The flat-tailed horned lizard status has recently been change to a Federal Candidate Endangered Species.	Please change the discussion to reflect the change in status of the flat-tailed horned lizard to federal candidate status.	O2-41

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42	4.4.17	The flat-tailed horned lizard status has recently been change to a Federal Candidate Endangered Species. Please add to discussion.	Please change the discussion of the flat-tailed horned lizard to reflect its change in status	O2-42
43	4.4.47	2nd and 3rd paragraphs regarding CV milk-vetch occurrence along Varner Road and along Mirage Santa Rosa says there is a potential for the plant to occur along the routes even though the area is disturbed. Initial surveys did not find the species in those locations.	Please add to the discussion that no CV milk vetch were found during spring and summer 2009 surveys.	O2-43
44	4.4.48	Mitigation ratio for CV-milk-vetch of 3:1 for temporary impact and 9:1 for permanent loss of habitat seems excessive given the extensive disturbance in the area. No rationale is give for these mitigation ratios. SCE will provide replacement habitat as required by the appropriate agency.	Please revise to reflect that SCE will provide appropriate compensation as required by or negotiated with the appropriate resource agency.	O2-44

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45	4.4.50	SCE will retain the services of a qualified and permitted (where required) biologist to perform the duties of the biological monitor; therefore, it is unnecessary to require that the monitor shall be a CPUC-authorized biologist.	Please change text under second bullet as follows: SCE and/or its construction contractors shall retain and have available, the services of an ~~CPUC~~ authorized biologist who shall perform the duties of the biological monitor.	O2-45
46	4.4.51	Mitigation ratio for CV-fringe-toed lizard of 3:1 for temporary impact and 9:1 for permanent loss of habitat seems excessive given the extensive disturbance in the area plus the other extensive mitigation. No rationale is given for these mitigation ratios.	Please revise mitigation measure to delete the ratios and indicate that SCE will provide appropriate compensation as required by or negotiated with the appropriate resource agency.	O2-46
47	4.4-56	Sand fences also exist in the area that provide perching habitat for loggerhead shrike and other species. Sand fences provide more suitable roosting habitat than overhead lines. This may be a significant factor for roosting of predators reducing the impacts of the proposed project	Please include a discussion of the role of existing sand fences as perching habitat.	O2-47

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48	4.4.58	Although there may be Other Waters of the United States, the proposed project does not contain wetlands. The term wetlands is misleading as the proposed project route does not contain wetlands as defined by the Army Corps of Engineers.	We recommend changing wetlands to jurisdictional waters.	O2-48
49	4.4-50 4.4-51	Ten years of monitoring is excessive; five years is consistent with past monitoring requirements. Please revise the language as follows:	"Each plant that is destroyed due to construction in the ROW along the east and west side of Gene Autry Trail roadway shall be replaced and monitored for at least ~~10 years~~ five years or as approved by USFWS…"	O2-49
50	4.4-58	SCE will provide appropriate Wetlands mitigation and replacement, if applicable, as required by or negotiated with the appropriate wildlife agency. Please revise text as indicated:	~~"If restoration is available and feasible, then a mitigation replacement ratio of at least 2:1 shall be used. If a wetlands needs to be created, at least a 3:1 ratio shall be implemented to offset losses. Where practical and feasible, onsite mitigation shall be implemented.~~ Wetlands mitigation and replacement, if applicable, shall be provided as required or negotiated with the appropriate wildlife agency.to offset losses."	O2-50

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51	4.4-65	Mitigation for CV fringe-toed lizard and CV milk vetch are not discussed for Alternative 3 as to ratios and the type of mitigation.	Due to the disturbed nature of the alternative, the ratio of mitigation should be less than the proposed project. This should be discussed under this alternative.	O2-51
Cultural Resources				
52	4.5-7	The proposed Farrell-Garnet 115 kV line would be installed overhead on towers constructed along an existing dirt road north of Garnet Hill, placing the resource within viewshed but outside the Area of Potential Effects (APE) in terms of physical impact; whether being within viewshed would constitute an ambience impact to this resource is not clear at this time.	Please replace first sentence with the following: **Hoon wit ten ca va (Garnet Hill).** This resource is located within the viewshed but outside the physical APE for the proposed overhead Farrell-Garnet 115 kV alignment. [Balance of paragraph remains unchanged.]	O2-52

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53	4.5-8	The proposed Mirage-Capwind-Devers-Tamarisk 115 kV line reconfiguration would involve changes to existing structures, and would not physically affect Varner road. The proposed overhead Mirage-Santa Rose 115 kV line would be overhead and run parallel to, but away from, Varner Road; accordingly, there would be no physical impacts to the roadway.	Please replace the first sentence with the following: **33-8408 (Varner Road).** This resource is located within the viewshed, but outside the physical APE for the proposed overhead reconfigured Mirage-Capwind-Devers-Tamarisk 115 kV line and the proposed overhead Mirage-Santa Rosa 115 kV subtransmission line alignment. [Balance of paragraph remains unchanged.]	O2-53
54	4.5-8	The proposed Farrell-Garnet 115 kV line would be installed overhead on towers constructed parallel to, but away from the railroad line, placing the resource within viewshed but outside the Area of Potential Effects (APE) in terms of physical impact. The proposed Mirage-Santa Rosa 115 kV line would be overhead and terminate at a riser pole situated northeast of the railroad line, and therefore would not physically impact it.	Please replace the first sentence with the following: O2-53 **33-9498/CA-RIV-6381H (Southern Pacific Railroad/Union Pacific Railroad line).** This resource is within the viewshed of, but outside the physical APE for the proposed overhead Farrell-Garnet 115 kV alignment and the proposed overhead Mirage-Santa Rosa 115 kV alignment. [Balance of paragraph unchanged.]	O2-54

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Comment Number	Page Number	Comment	Suggested Revision
55	4.5-9	The archaeological survey performed for this project identified surface artifacts designated as site P33-15429 at a location east of the existing subtransmission line and east of the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment, and suggested that a possible subsurface component might extend westward into a previously impacted area within the proposed project's APE. A field review conducted on 4 February 2010 by SCE archaeologist David Hanna, M.A., RPA, together with the SCE designer and his newly completed 100% plans, revealed that site P33-15429 is situated at the previously recorded UTM coordinates and about 40 meters (131 feet) east of the poles that currently carry the Mirage-Tamarisk and Mirage-Concho lines, which in this area would be reconfigured without pole replacement. West of the recorded site limits, no surface artifacts or reason to suspect the present of subsurface artifacts were noted despite near-	Please replace the first sentence with the following: **33-15429.** This resource is known to be located adjacent to and outside of the APE for the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment. [Balance of paragraph unchanged.]

O2-55

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Comment Number	Page Number	Comment	Suggested Revision
55 (cont)		100% ground surface visibility. Therefore, since the proposed new Mirage-Santa Rosa line would be west of the dirt access road, site P-33-15429 is well outside the Proposed Project's APE.	

O2-55 cont.

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Comment Number	Page Number	Comment	Suggested Revision
56	4.5-9	The archaeological survey performed for this project identified surface artifacts designated as site P33-15430 at a location west of the existing subtransmission line and west of the area that would be physically impacted by the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment. A field review conducted on 4 February 2010 by SCE archaeologist David Hanna, M.A., RPA, together with the SCE designer and his newly completed 100% plans, revealed that site P33-15430 is situated at the previously recorded UTM coordinates and about 11 meters (35 feet) west of the proposed new Mirage-Santa Rosa line, for the construction of which access would be from that existing dirt road to its east. The poles that currently carry the Mirage-Tamarisk and Mirage-Concho lines, which in this area would be reconfigured	Please replace the first sentence with the following: **33-15430.** This resource is located within the viewshed, but outside the physical APE for the proposed Mirage-Santa Rosa 115 kV subtransmission alignment. [Balance of paragraph unchanged.]

O2-56

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Comment Number	Page Number	Comment	Suggested Revision
56 (cont)		without pole replacement, are east of the existing dirt access road. Therefore, site P-33-15430 is well outside the Proposed Project's APE.	

O2-56 cont.

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Comment Number	Page Number	Comment	Suggested Revision
57	4.5-23	Please revise the DEIR analysis to incorporate findings in information contained in the above-comments.	[Keep the first two paragraphs] [Replace 3rd paragraph with the following] Historic resource 33-4898 (Varner Road) would not be impacted by the Proposed Project. It would be spanned by the proposed overhead reconfigured Mirage-Capwind-Devers-Tamarisk 115 kV line and the proposed overhead Mirage-Santa Rosa 115 kV subtransmission line, and no ground-disturbing activity would occur within the roadway. Therefore, there would be no impacts to this resource (No Impact). Native American cultural resource *Hoon wit ten ca va* (Garnet Hill) would not be physically impacted by the Proposed Project. The proposed Farrell-Garnet 115 kV line would be installed overhead on towers constructed along an existing dirt road north of Garnet Hill, and no ground disturbing activity would occur within the limits of this topographical feature. Prehistoric archaeological sites 33-15429 and 33-15430 would not be impacted by the Proposed Project. The proposed Mirage-Santa Rosa 115 kV line would be constructed on overhead towers west of

O2-57

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57 (cont.)			33-15429 and east of 33-15430, and all access would be from an existing dirt road located immediately west the poles that currently carry the Mirage-Tamarisk and Mirage-Concho lines, which in this area would be reconfigured using the dirt access road. Prehistoric archaeological site 33-15429 might be impacted by the Proposed Project. The resource is located east of the existing subtransmission line and east of the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment. It is not known if there is a subsurface component to this resource, and if so, whether it might extend into the previously impacted area that lies within the proposed project's APE. Prehistoric archaeological site CA-RIV-785 could be impacted by the Proposed Project. A portion of it is located within the APE for the proposed Mirage-Santa Rosa 115 kV line.	O2-57 cont.
58	4.5-23-24	The last sentence under Impact 4.5-1 indicates "…no impact to Varner Road would occur as a result of this work.	Please revise Impact 4.5-1 to state "No Impact" as indicated in the analysis and stated in the last sentence of this section.	O2-58

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59	4.5-26	The archaeological survey performed for this project identified surface artifacts designated as site 33-15430 at a location slightly west of the existing subtransmission line and west of the area that would be physically impacted by the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment. Therefore, this site would not be impacted and can be deleted and does not require mitigation.	Please revise the EIR to reflect that site 33-15430 will not be impacted by the proposed project.	O2-59
60	4.5-31-34	Please revise the DEIR to include potential impacts to paleontological, cultural, and archaeological resources due to undergrounding.	Please see Attachment 3, Cultural Comparison Table.	O2-60

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Comment Number	Page Number	Comment	Suggested Revision
61	4.6-2	Based on our review, Holocene* surface rupture was not documented along the Garnet Hill fault in the vicinity of the project area (SCEDC). Geomorphic evidence of the fault is not apparent along the proposed project alignment. The Garnet Hill fault is not within an Alquist -Priolo Earthquake Fault Zone (California Geological Survey (CGS), 2007). Therefore, the statement should be removed. *An active fault is defined as a fault which has had surface displacement within Holocene time (CGS, 2007).	Please remove the following statement: ~~"the Garnet Hill fault can act as a plane of weakness and move in response to an earthquake on another nearby fault. Ground fractures associated with the 1986 North Palm Springs earthquake were reported along the trace of the Garnet Hill fault and indicate that a near-surface response of weak surfaces occurred at depth (City of Cathedral City, 2002). "~~ (Following reference to be added to p. 4-16) Southern California Earthquake Data Center (SCEDC), 1986 North Palm Springs Earthquake: http://www.data.scec.org/

O2-61

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Comment Number	Page Number	Comment	Suggested Revision
Geology and Soils			
62	4.6-3	Incorrect terminology "ground rupturing" is used. Please revise text as indicated:	**"Seismic Activity** The two most …….. The 1986 quake registered a magnitude of 5.6 and caused minor ground ~~rupturing~~ cracks along the Banning, ….."

O2-62

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63	4.6-4	Please incorporate additional information to the end of Section 4.6 regarding subsidence. Please add the references to page 4.6-16.	**Please add the following paragraph to page 4.6-4:** The USGS monitored subsidence in the Coachella Valley area between 1996 and 2005 (Sneed and Brandt, 2007). Subsidence was not indicated for the proposed project area. In addition, the Coachella Valley Water District (CVWD) adopted a comprehensive Water Management Plan (WMP) for the Coachella Valley (CVWD, 2007). The WMP will increase imported water, promote conservation and provide alternative sources of water to reduce the potential for additional subsidence. Please add references to 4.6-16: Sneed, M. and Brandt, J., 2007, Detection and Measurement of Land Subsidence Using Global Positioning System Surveying and Interferometric Synthetic Aperture Radar, Coachella Valley, California: U.S. Geological Survey Sceintific Investigations Report 2007-5251, 31p. Coachella Valley Water District, 2007, Press Releases, Dated December 17: http:www.cvwd.org\news\press33.php

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64	4.6-5	The Federal regulatory context was not included, and should be added. Please add text as follows:	**Federal** **Institute of Electrical and Electronics Engineers (IEEE) 693 "Recommended Practices for Seismic Design of Substations"** The Institute of Electrical and Electronics Engineers (IEEE) 693 "Recommended Practices for Seismic Design of Substations" was developed by the Substations Committee of the IEEE Power Engineering Society, and approved by the American National Standards Institute and the IEEE-SA Standards Board. This document provides seismic design recommendations for substations and equipment consisting of seismic criteria, qualification methods and levels, structural capacities, performance requirements for equipment operation, installation methods, and documentation. This recommended practice emphasizes the qualification of electrical equipment. IEEE 693 is intended to establish standard methods of providing and validating the seismic withstand capability of electrical substation equipment. However, the seismic recommendations for foundation design should comply with the appropriate current building code. IEEE 693 provides detailed test and analysis methods for each type of major equipment or component found in electrical substations. This recommended practice is intended to assist the substation user or operator in providing substation equipment that will have a high

O2-64 cont.

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64 (cont)			probability of withstanding seismic events to predefined ground acceleration levels. It establishes standard methods of verifying seismic withstand capability, which gives the substation designer the ability to select equipment from various manufacturers, knowing that the seismic withstand rating of each manufacturer's equipment is an equivalent measure. This recommended practice should be used in all areas that may experience earthquakes. **International Building Code** Published by the International Code-Council (ICC), the scope of this code covers major aspects of construction and design of structures and buildings, The 2006 International Building Code replaces the 1997 Uniform Building Code and contains provisions for structural engineering design. Published by the International Conference of Building Officials, the 2006 International Building Code(IBC) addresses the design and installation of structures and building systems through requirements that emphasize performance. The IBC includes codes governing structural as well as fire- and life-safety provisions covering seismic, wind, accessibility, egress, occupancy, and roofs.

O2-64 cont.

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65	4.6-5	Add California Building Code (CBC) 2007 after **Alquist-Priolo Earthquake Fault Zoning Act and** **Seismic Hazards Mapping Act.**	Replace "Design Standards" on p. 4.6-5 with the following text: **California Building Code** The California Building Code, Title 24, Part 2 (CBC, 2007) provides building codes and standards for design and construction of structures in California. The 2007 CBC is based on the 2006 International Building Code with the addition of more extensive structural seismic provisions. As the proposed Project lies within Seismic Zone 4, provisions for design should follow the requirements of Chapter 16 of the CBC 2007, which contains definitions of seismic sources and procedure used to calculate seismic forces on structures. Chapter 33 of the CBC contains requirements relevant to the construction of underground transmission lines.

O2-65

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66	4.6-5	This section would be replaced with the section titled California Building Code (see above).	Please remove the following: ~~**Design Standards**~~ ~~Building codes provide specific standards for design and construction of buildings and structures.~~ ~~On January 1, 2008, California officially adopted the 2007 California Building Code (CBC). The~~ ~~purpose of the CBC is to provide minimum standards to safeguard life or limb, health, property,~~ ~~and public welfare by regulating and controlling the design, construction, quality of materials,~~ ~~use, occupancy, location, and maintenance of all buildings and structures within its jurisdiction.~~ ~~The CBC provides criteria for defining expansive soils.~~

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67	4.6-10	Based on our review, Holocene* surface rupture was not documented along the Garnet Hill fault in the vicinity of the project area (SCEDC). Geomorphic evidence of the fault is not apparent along the proposed project alignment. The Garnet Hill fault is not within an Alquist -Priolo Earthquake Fault Zone (California Geological Survey (CGS), 2007).	Remove the following : ~~The only fault that would intersect any of the Proposed Project components is the Garnet Hill fault, which is mapped as buried with a location that is postulated across the proposed Farrell-Garnet alignment. Whereas seismic activity is not limited to active faults, ground rupture is typically associated with active faults. However, ground fractures associated with the 1986 North Palm Springs earthquake were reported along the trace of the Garnet Hill fault, but the fractures were a result of ground shaking rather than fault rupture. In addition, pursuant to APM GEO-2, tower locations (in the case of the proposed Farrell-Garnet subtransmission line, pole locations) would be selected to accommodate anticipated fault offset, and minimize excessive tension in lines, should a fault movement occur. Therefore, based on the location of the proposed components and the active faults in the region, the potential for surface fault rupture to affect the Proposed Project would be minimal. Potential ground surface rupture impacts are considered to be less than significant.~~ *Replace with:* There are no active earthquake faults that are recognized or zoned by the State of California in the immediate vicinity of the Proposed Project alignments and sites. Potential ground surface rupture impacts are considered to be less than significant.

O2-67

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68	4.6-11	In order for liquefaction to occur, there needs to be relatively shallow groundwater conditions, generally at depths of less than 50 feet below the ground surface. Shallow groundwater conditions do not exist in the project area and the Proposed Project would not cause the groundwater table to rise. The potential impact related to seismic-related ground failure, including liquefaction, would be less than significant.	Revise as follows: "In order for liquefaction to occur, there needs to be relatively shallow groundwater conditions, generally at depths of less than 50 feet below the ground surface. Shallow groundwater conditions do not exist in the project area and the Proposed Project would not cause the groundwater table to rise. ~~Regardless, the potential for liquefaction or other phenomena resulting in dynamic ground settlement, if even present, can be easily reduced with adequate geotechnical and foundation engineering. Therefore, with the implementation of standard engineering practices, any potential impacts associated with liquefaction, if discovered during geotechnical investigations that would be conducted for the Proposed Project, would be reduced to less than significant levels.~~ The potential impact related to seismic-related ground failure, including liquefaction, would be less than significant.	O2-68
Hazards and Hazardous Materials				
69	8-29	Mitigation measure HAZ-2 Fire Management Plan is identified in DEIR Section 4 (p. 4.7-20), but is not listed in DEIR Section 8 Mitigation Monitoring, Reporting and Compliance Program (MMRCP).	Please revise to include this mitigation measure.	O2-69
Hydrology and Water Quality				

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70	4.8-21	The Whitewater Wash is an active sand area where topography changes frequently with water and wind activity. Thus, restoration to exact pre-construction contours would not necessarily achieve the desired condition. Further, grading is not expected to be substantial. A more feasible measure would be general restoration of the disturbed area. Please revise Mitigation Measure 4.8-4b as indicated.	~~Regarding the engineered erosion control and drainage plan developed as part of the site grading plan (APM HYDRO-2A), SCE shall conduct a topographic and gradient survey of the Whitewater River Wash both upstream and downstream of the proposed pole(s) replacement location within the wash. Post construction topography and gradient of the Whitewater River Wash shall be contoured to~~ SCE shall restore all areas in the Whitewater Wash disturbed during construction of the Proposed Project to match the existing conditions, to ensure that the drainage pattern is not altered in a manner that would cause on- or off-site erosion or sedimentation.	O2-70
Noise				
71	4.11-18	As the CPUC has jurisdiction over all electrical facilities, we recommend submittal only to the CPUC.	Please revise second paragraph of Mitigation Measure 4.11-2 to remove references to County of Riverside..	O2-71

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72	4.11-18	Please re-word Mitigation Measure 4.11-2 (first paragraph) relative to the transformer, as follows:	Noise control techniques may include, but not be limited to: locating the new transformer with as much setback from the existing residential properties as possible, use ~~of noise walls or equivalent sound attenuation devices~~, and the use of a transformer with ~~special noise control specifications designed in a way to specifically achieve acceptable regulatory noise standards~~ sound levels as specified in the approved "SCE Specification A5-2009: Large Three-Phase Transformers and Autotransformers with OLTC for a nominal system voltage of 220/230kV." "

O2-72

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73	4.11-18	SCE engineering requests a noise study to be performed during the initial design of the project to verify that all noise level requirements/guidelines are met. If the noise level requirements/guidelines are not met, then SCE will follow the suggested noise mitigation measures as specified in the noise report, thus capturing and addressing issues in the design phase and not at the construction phase. As such, retention of an acoustical engineer is unnecessary. Please re-word Mitigation Measure 4.11-2 (second paragraph) relative to an acoustical engineer as follows:	Prior to the installation of the new transformer, SCE shall submit to the CPUC ~~and the County of Riverside~~, for review and approval, a plan that describes the specific measures that will be taken to attenuate noise. ~~in order to comply with the County's stationary noise standards. Once the proposed transformer is operational, SCE shall retain an acoustical engineer to perform noise measurements in the vicinity of the residences west of Mirage Substation to verify that transformer noise levels comply with the County standards. Documentation of compliance shall be submitted to the CPUC and Riverside County.~~ In the event that transformer noise levels violate the standards, additional noise control techniques shall be initiated to correct the violation.	O2-73
Population and Housing				
74	4.12-5	Construction schedules are likely to change due to the expected CPUC approval schedule.	"Construction activities in the project area are expected to last approx 12 -24 months, <u>within the 2010-2012 time frame</u>. ~~beginning in 2010 and concluding in mid-2011."~~	O2-74

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75	4.15-1	Please note that Caltrans uses AADT. Counts cited from CVAG, Riverside County, or City of Palm Springs use ADT.	Please revise transportation and traffic section to reflect this distinction.	O2-75
Transportation and Traffic				
76	4.15-2	Garnet Avenue parallels the I-10, not the I-5. Please revise the last paragraph as follows:	Garnet Avenue is a two lane road that parallels the south side of ~~I-5~~ I-10 and has no lane stripes and has low traffic levels.	O2-76
77	4.15-3	According to the county of Riverside 2009 traffic counts (using ADT), Indian Canyon Dr. between I-10 and San Rafael has an ADT of 22,307. This differs significantly from the cited CVAG figure of 15,200.	Please confirm and revise the references.	O2-77
Electric and Magnetic Fields				
78	Appendix B, Section 1, Page 1	"Units of measure are Gauss (G) or milliGauss (mG, 111000 of a Gauss)."	Change to: "Units of measure are Gauss (G) or milliGauss (mG, ~~111000~~ 1/1000 of a Gauss)."	O2-78
79	Appendix B, Section 1, Page 2	"It's recommendations were field with the Commission in March of 1992."	Change to: "It's recommendations were ~~field~~ filed with the Commission in March of 1992 and became the basis for the CPUC's EMF Policy established in D. 93-11-013."	O2-79

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Comment Number	Page Number	Comment	Suggested Revision	
80	Appendix B, Section 1, Page 2	"Based on the work of the Consensus Group, written testimony and evidentiary hearings, the CPUC issued its decision (D.06-01-042) to address….."	Change to: "Based on the work of the Consensus Group, written testimony and evidentiary hearings, the CPUC issued its ~~decision (D.06-01-042)~~ decisions (D. 93-11-013 and D.06-01-042) to address….."	O2-80
81	Appendix B, Section 1, Page 4	Global change-"…(Appendix D Section 2)…"	Change to: -"…(Appendix ~~D~~ B - Section 2)…"	O2-81
Comparison of Alternatives				
82	5-2	3rd paragraph, 2nd sentence is unclear.	Reword to state that there are two subsets of alternative routes, e.g.; 1) Farrell-Garnet, which includes the Proposed Project and Alternatives 2, 3, 6, and 7, and (2) Mirage-Santa Rosa, which includes the Proposed Project and Alternative 5.	O2-82
83	5-4	Table 5-2, Aesthetics: Under "Proposed Project" – Numbers are reversed:	The Farrell-Garnet line would include 5.8 miles of overhead line and the Mirage-Santa Rosa line would include 1.5 miles of overhead line.	O2-83

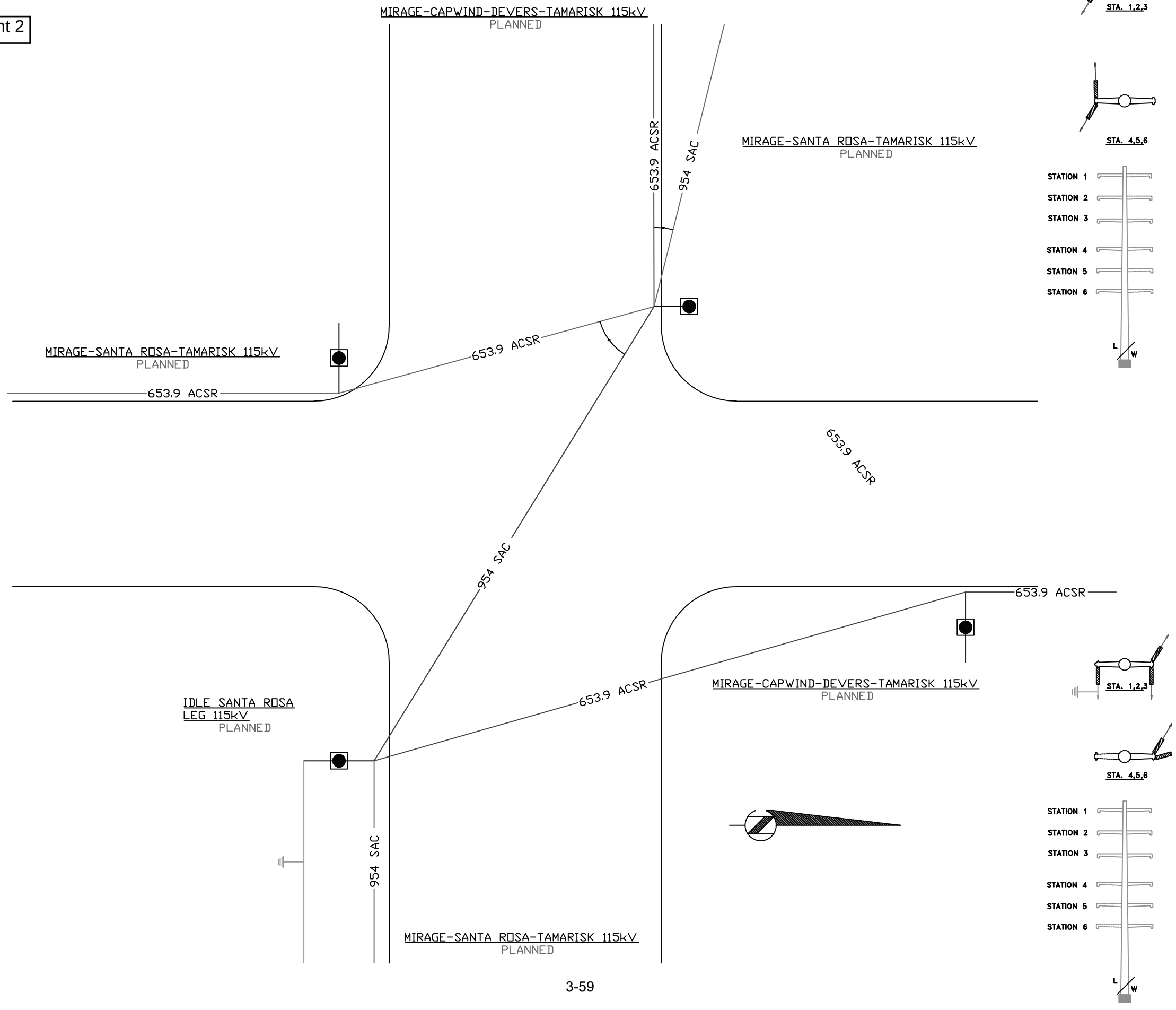
Attachment 1, Cultural Comparison						
Issue Area	**Proposed Project**	**Alternative 2**	**Alternative 3**	**Alternative 5**	**Alternative 6**	**Alternative 7**
Cultural Resources	Overhead Farrell-Garnet line would have point-specific paleontology impacts and non-physical impact on Native American topographical resource *Hoon wit ten ca va* /Garnet Hill; overhead Mirage-Santa Rosa line would have point-specific paleontology impacts and physical impacts to archaeological	Overhead segment would have non-physical and point-specific physical impacts on Native American topographical resource *Hoon wit ten ca va* /Garnet Hill; underground segment would have greater paleontology impacts and possibly archaeology impacts (to currently	Overhead segment would have point-specific paleontology impacts and non-physical impact on Native American topographical resource *Hoon wit ten ca va* /Garnet Hill; underground segment would have greater paleontology impacts and possibly archaeology impacts (to currently	Underground segment would have physical impacts on historic cultural resource 33-8408/Varner Road by linear trenching within length of roadway and trenching across roadway, and greater paleontology impacts and possibly archaeology impacts (to currently	Underground segment would have greater paleontology impacts and possibly archaeology impacts (to currently unknown resources) than overhead Farrell-Garnet line; overhead segment would have paleontology impacts and possibly archaeology impacts (to currently	Would have paleontology impacts and possibly archaeology impacts (to currently unknown resources) equivalent to overhead Garnett-Farrell line.

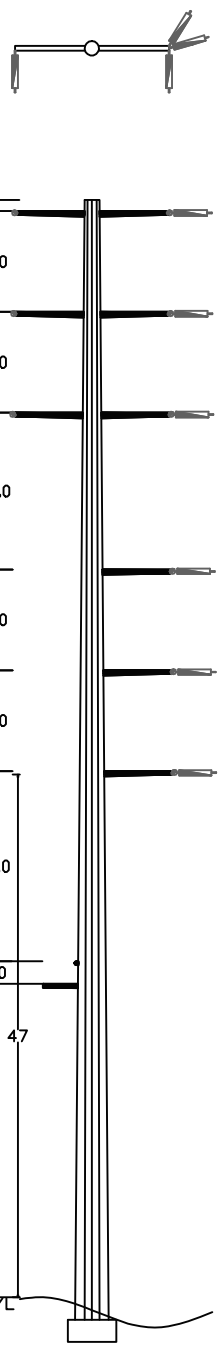
Attachment to O2-8

	site CA-RIV-785.	unknown resources) than overhead Farrell-Garnet line.	unknown resources) than overhead Farrell-Garnet line.	unknown resources) than overhead Mirage-Santa Rosa line.	unknown resources) equivalent to overhead Garnett-Farrell line.	

Attachment to O2-8 cont.

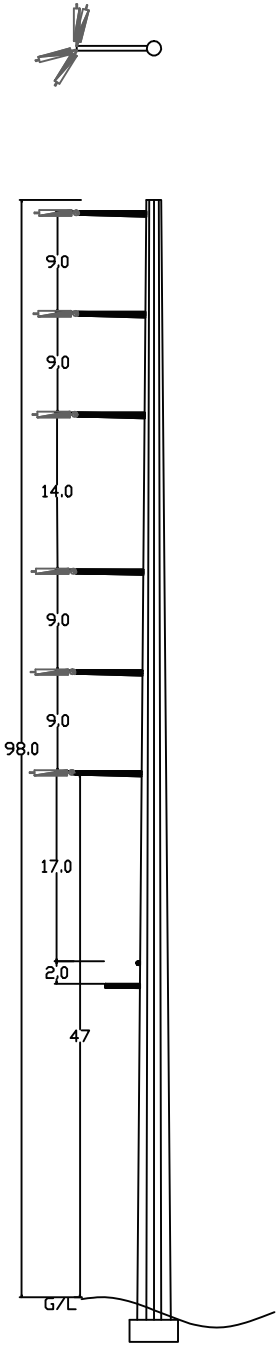
Attachment 2





DOUBLE CIRCUIT TSP TEE CONFIGURATION WITH UMBRELLA/GROUND WIRE AND FIBER OPTIC COMMUNICATION CABLE.

LOCATION: SOUTHEAST CORNER OF BOB HOPE DR. AND DINAH SHORE DR. (LOOKING WEST)



DOUBLE CIRCUIT TSP TEE CONFIGURATION WITH UMBRELLA/GROUND WIRE AND FIBER OPTIC COMMUNICATION CABLE.

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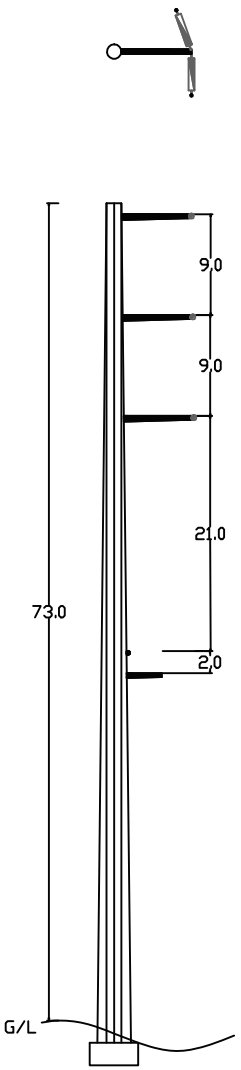
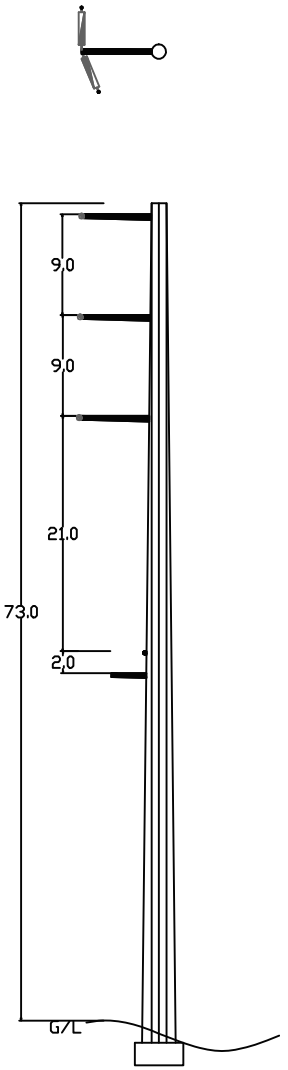


DOUBLE CIRCUIT TSP TEE CONFIGURATION WITH UMBRELLA/GROUND WIRE AND FIBER OPTIC COMMUNICATION CABLE.

LOCATION: SOUTHWEST CORNER OF BOB HOPE DR. AND DINAH SHORE DR. (LOOKING NORTH)



DOUBLE CIRCUIT TSP TEE CONFIGURATION WITH UMBRELLA/GROUND WIRE AND FIBER OPTIC COMMUNICATION CABLE.

LOCATION: NORTHEAST CORNER OF BOB HOPE DR. AND DINAH SHORE DR. (LOOKING NORTH)

CHAPTER 4
Responses to Comments

Letter O1, Native American Heritage Commission

Response O1-1 The NAHC comment letter notes that Native American Cultural resources were identified within one-half mile of the Proposed Project's Area of Potential Effect (APE), and the NAHC recommends early consultation with identified Native American tribes as the best way to avoid unanticipated discoveries once a project is underway. The NAHC further recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is needed. The NAHC letter does not state a specific concern or question regarding a significant environmental impact or the adequacy of the Draft EIR.

Potential interested parties recommended by the NAHC were contacted via letter. The Draft EIR (Section 4.5, *Cultural Resources*) notes that prior contact has been made to the NAHC and that the NAHC provided a list of Native American contacts that may have knowledge of resources in the study area. Potential interested parties recommended by the NAHC were contacted via letter. The Draft EIR also acknowledges that Native American Cultural resources are known to be present within one-half mile of the Proposed Project's APE, and identified five previously recorded resources and five newly recorded resources. The Draft EIR further notes that consultation with the Cahuilla Indian Tribe has been initiated and would be on going throughout the construction of the proposed Farrell-Garnet 115 kV subtransmission line. Further, Applicant Proposed Measures (APMs) CUL-1 through CUL-6 identify how SCE would consult with the Native American community prior to and during construction. The Draft EIR also requires mitigation measures for avoidance and provisions for accidentally-discovered cultural resources, as well as procedures to be followed in the event of accidental discovery of human remains. No changes or additions to the Draft EIR are necessitated by the NAHC comment letter.

Letter O2, Southern California Edison Company

Global Comments

Response O2-a The Applicant expresses their disagreement with several areas of analysis in the Draft EIR. Each of the material areas of disagreement are addressed in the specific comments that follow.

Response O2-b The Applicant disagrees with the Draft EIR conclusion that Alternatives 3 and 5 would result in fewer long-term impacts to aesthetics when compared to the Proposed Project. With regard to Alternative 3, the Applicant notes that the new subtransmission line would be built on structures approximately 80- to 98-feet high compared to the existing structures that are approximately 34- to 48-feet high, and asserts that this visual impact would be greater than for the Farrell-Garnet segment of the Proposed Project which would construct the new subtransmission line on structures that are closer in height to the existing structures in that corridor. The Applicant further notes that Alternative 3 would be constructed along Indian Canyon Drive, which is a main entrance into Palm Springs. However, we note that these considerations have to be balanced against the fact that Alternative 3 would have 2.9 miles less overhead line (i.e., approximately half) than would the Proposed Project for the Farrell-Garnet segment. Nonetheless, we agree with the Applicant that the visual sensitivity along Indian Canyon Drive should be afforded greater weight in this analysis, and thus the visual impact of Alternative 3 should be considered slightly greater than that of the Proposed Project for the Farrell-Garnet segment. Accordingly, the first bullet on page 5-9 of the Draft EIR is revised as follows. Also, Table 5-2 has been updated and is included in Section 5 of this Response to Comments document.

- **Aesthetics** - Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. Alternative 7 would involve the most amount of overhead line in the Farrell-Garnet study area, including the most overhead line in residential areas and a crossing of I-10. Alternative 3 would involve the least amount of overhead line with no I-10 crossings, but would result in nearly doubling the height and base diameter of structures along Indian Canyon Road which is a major entryway to the City of Palm Springs. Alternative 2 is considered the most favorable for aesthetics because the overhead portion of that line would be in an area with low visual sensitivity. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: ~~Alternative 3, Alternative 6,~~ Alternative 2, the Proposed Project Farrell-Garnet line, Alternative 6, Alternative 7, and Alternative ~~7~~3. For the Mirage-Santa Rosa study area, Alternative 5 would result in only a short span of overhead line across I-10 and the UPRR, compared to

the Proposed Project Mirage-Santa Rosa line, which would include approximately 1.5 miles of overhead line. Therefore, Alternative 5 is more favorable than the Proposed Project Mirage-Santa Rosa line.

With regard to Alternative 5, the Applicant notes that this alternative would result in two 95-foot riser poles – one inside the Mirage Substation and one at the intersection of Varner Road and Vista De Oro. The Applicant claims that these two riser poles would have greater visual impact than would the Mirage-Santa Rosa segment of the Proposed Project which would involve the removal of 29 structures and the installation of 55 structures, seven of which would be bolted-based TSPs between 70 and 100 feet above ground, depending on their specific location. We disagree with the Applicant's assertion that the two riser poles associated with Alternative 5 would have greater impacts to aesthetics than would the proposed Project for the Mirage-Santa Rosa segment. As a result, no changes are being made to the Draft EIR analysis or conclusions for aesthetics for the Mirage-Santa Rosa segment.

Response O2-c The CPUC has considered the Applicant's points related to the ranking of alternatives in the Draft EIR with regard to biological resources. In order for a more robust ranking of alternatives with respect to biological resources, the CPUC has decided to include more weight to the integrity of the habitat along the proposed and alternative alignments, in combination with the amount of permanent impacts that would result (i.e., the amount of overhead line that would occur under each alignment). Therefore, the second bullet on Draft EIR page 5-9 is revised as follows. Also, Table 5-2 has been updated and is included in Section 5 of this Response to Comments document.

- **Biological Resources -** Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. The Proposed Project alignments contain more suitable habitat for special status species than do the alternative alignments. Compared to the Proposed Project Farrell-Garnet line, Alternative ~~3~~7 would result in the ~~least~~ most amount of overhead line ~~and associated long-term impacts~~; however, Alternative 7 would be constructed in the least suitable habitat for special status species, making it the most favorable alternative, followed by Alternative 6, Alternative 3, Alternative 2, and the Proposed Project Farrell-Garnet line~~, and Alternative 7~~. Compared to the Proposed Project Mirage-Santa Rosa line, which would result in approximately 1.5 miles of new overhead line in more suitable habitat for special status species, Alternative 5 would result in only a short segment of overhead line associated with the I-10 and UPRR crossings and it would be in less suitable habitat for special status species.

Response O2-d The CPUC has considered the Applicant's points related to the ranking of alternatives in the Draft EIR with regard to cultural resources. The CPUC has decided to include more weight to potential impacts associated with discovery of previously unknown archeological and paleontological resources for the ranking of alternatives. Therefore, the following revisions have been made to the cultural resources environmentally superior alternative discussion on Draft EIR page 5-9. Also, Table 5-2 has been updated and is included in Section 5 of this Response to Comments document. For other revisions that have been made to Draft EIR Section 4.5, *Cultural Resources*, refer to Responses 52 to 60.

- **Cultural Resources** - Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. Alternative 6 and Alternative 7 would have no impact on the Garnet Hill cultural resource compared to the Proposed Project Farrell-Garnet line, Alternative 2, and Alternative 3. It should be noted that Alternative 2 is the only alignment that would include direct impacts to Garnet Hill. ~~Between Alternatives 6 and 7, Alternative 6~~ Alternatives 2, 3, and 6 would include ~~a~~ higher potential for an undiscovered find compared to the Proposed Project Farrell-Garnet line and Alternative 7 due to the ~~one-mile~~ underground line construction work that would be associated with ~~Alternative 6~~ those alternatives. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6, Alternative 3, ~~the Proposed Project Farrell-Garnet line,~~ and Alternative 2. Compared to the proposed Mirage-Santa Rosa line, Alternative 5 would avoid CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~. However, Alternative 5 would result in substantially more subsurface disturbance associated with trenching for the underground line compared to the Proposed Project Mirage-Santa Rosa line, which would result in more severe of an impact related to undiscovered cultural and paleontological resources. Therefore, ~~Alternative 5 is more favorable than~~ the Proposed Project Mirage-Santa Rosa line is more favorable than Alternative 5.

Response O2-e For revised text related to the rankings of alternatives with regard to aesthetics, biological resources, and cultural resources, refer to Responses O2-b through O2-d, above.

Response O2-f The CPUC agrees with the Applicant that the amount and duration of air emissions should be considered in ranking the alternatives within the air quality resource area even though the impact would be Class I for each. Therefore, the following revisions have been made to the first two paragraphs of the discussion of the environmentally superior alternatives on Draft EIR page 5-3.

As discussed in the previous section, the Proposed Project and all five alternatives would have significant unmitigable impacts on air quality during construction. The extent of the unmitigable impacts on air quality varies slightly by alternative but could not be mitigated to less than significant levels for the Proposed Project or any alternative. Consequently, the selection of an environmentally superior alternative is based on differences in intensity of air quality impacts ~~and type of~~ as well as the differences in intensity of the other environmental issue area impacts that would be less than significant with mitigation (Table 5-2). Based on these differences the identified environmentally superior alternative is the Proposed Project for both the Farrell-Garnett study area ~~is Alternative 3 and the identified environmentally superior alternative for~~ and the Mirage-Santa Rosa study area ~~is Alternative 5~~.

All five alternatives studied in this EIR were variations of alignments that would use existing ROW. The alternatives studied would substitute one component of the Proposed Project (i.e., Alternatives 2, 3, 6, or 7 would be used in lieu of the proposed Farrell-Garnet 115 kV subtransmission line and Alternative 5 would be used in lieu of the proposed Mirage-Santa Rosa 115 kV subtransmission line). For a number of resources, there are no material environmental impact differences between the Proposed Project and alternatives including: agricultural resources; ~~air quality;~~ geology and soils; ~~hazards and hazardous materials;~~ hydrology and water quality; land use, planning, and policies; mineral resources, ~~noise;~~ population and housing; ~~public services;~~ and recreation~~; and utilities and service systems~~.

In addition, the following revisions have been made to the first paragraphs of Draft EIR page 5-9. Also, Table 5-2 has been updated and is included in Section 5 of this Response to Comments document.

~~Implementation of the Proposed Project or any of the five alternatives would result in a significant unmitigable (Class I) impact on air quality during construction. Although impacts to air quality would be of varying degree (i.e., alternatives with an underground component would be slightly more adverse than the Proposed Project due to emissions during trenching activities), the impacts would be short term and temporary in nature; therefore, impacts of varying degree between alternatives is not material enough to determine a preferred alternative from an air quality perspective.~~

Resource categories where environmental impacts would either be materially lessened or increased by implementing an alternative to the Proposed Project are discussed below.

- **Air Quality** - Implementation of the Proposed Project or any of the five alternatives would result in a significant unavoidable (Class I) short-term impact on air quality during construction. The short-term impacts to air quality would be of varying degree (i.e., alternatives with an underground component would be slightly more adverse than the Proposed Project due to emissions during trenching activities, and Alternative 7 would be slightly more adverse than the Proposed Project due to the longer length of the alternative compared to the Proposed Project Farrell-Garnet line). Based on these varying degrees of impact, the ranking for the Farrell-Garnet study area (most to least favorable) is as follows: the Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6, Alternative 3, and Alternative 2. For the Mirage-Santa Rosa study area, the Proposed Project Mirage-Santa Rosa line is more favorable than Alternative 5.

Response O2-g The CPUC has considered the Applicant's points related to the ranking of alternatives in the Draft EIR with regard to noise. The CPUC has decided to include more weight to potential impacts associated with the duration of construction activity noise that would occur in the vicinity of sensitive receptors. Therefore, the following paragraph has been added to the environmentally superior alternative discussion before the first complete paragraph on Draft EIR page 5-10. Also, Table 5-2 has been updated and is included in Section 5 of this Response to Comments document.

- **Noise** - Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. Compared to the alternative lines, the Proposed Project lines would involve the least duration of construction work in the vicinity of sensitive receptors (i.e., residences). Compared to the Proposed Project Farrell-Garnet line, Alternative 3 would result in the highest duration of construction activity in the vicinity of sensitive receptors due to the longest length of underground line work that would occur near residences, followed by Alternative 2 and Alternative 6. Alternative 7 would not include underground line work, but would affect more sensitive receptors than the Proposed Project Farrell-Garnet line. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: the Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6, Alternative 2, and Alternative 3. Compared to the Proposed Project Mirage-Santa Rosa line, Alternative 5 would result in a longer duration of construction activity in the vicinity of more sensitive receptors. Therefore, the Proposed Project Mirage-Santa Rosa line is more favorable than the Alternative 5 line.

Response O2-h The CPUC has considered the Applicant's points related to the ranking of alternatives in the Draft EIR with regard to public services. The CPUC has decided to include more weight to potential impacts associated with emergency

response times. Therefore, the following paragraph has been added to the environmentally superior alternative discussion before the first complete paragraph on Draft EIR page 5-10. Also, Table 5-2 has been updated and is included in Section 5 of this Response to Comments document.

- **Public Services** - Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. Compared to the alternative lines, the Proposed Project lines would involve the least potential for construction activities to affect vehicle access and fire department response times because the alternatives with underground components would require lengthier lane closures that could more severely affect emergency response times, and Alternative 7 would be slightly more adverse than the Proposed Project due to the longer length of the alternative and more lane closures associated with overhead road crossings compared to the Proposed Project Farrell-Garnet line. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: the Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6, Alternative 2, and Alternative 3. For the Mirage-Santa Rosa study area, the Proposed Project Mirage-Santa Rosa line is more favorable than the Alternative 5 line.

Response O2-i The Applicant expresses support for the Draft EIR conclusion that the Proposed Project lines would be more favorable than the alternatives with regard to short-term impacts associated with traffic and transportation. No revisions to the Draft EIR are requested.

Response O2-j The CPUC has considered the Applicant's points related to the ranking of alternatives in the Draft EIR with regard to utilities and service systems. The CPUC has decided to include more weight to potential impacts associated with disturbing utilities during construction activities. Therefore, the following paragraph has been added to the environmentally superior alternative discussion before the first complete paragraph on Draft EIR page 5-10. Also, Table 5-2 has been updated and is included in Section 5 of this Response to Comments document.

- **Utilities and Service Systems** - Impacts would be less than significant for all of the alternatives. Compared to the alternative lines, the Proposed Project lines would involve the least potential for construction activities to disturb utilities because the alternatives with underground components would have a higher potential to disturb underground utilities, and Alternative 7 would be slightly more adverse than the Proposed Project due to the longer length of the alternative and the greater potential for the additional pole excavations to disturb underground utilities compared to the Proposed Project Farrell-Garnet line. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: the Proposed Project Farrell-Garnet line, Alternative 7,

Alternative 6, Alternative 3, and Alternative 2. For the Mirage-Santa Rosa study area, the Proposed Project Mirage-Santa Rosa line is more favorable than the Alternative 5 line.

Response O2-k The Applicant states that construction of Alternatives 3 and 5 would cost approximately five times more than would construction of the project as proposed, and that such a substantial increase in cost would not result in any material environmental benefits. Construction cost is not a factor that is considered in CEQA when determining the environmentally superior alternative. The CPUC may consider cost and other factors when making a decision on the project, and, if warranted and justified, may approve an alternative that is not the Environmentally Superior Alternative.

Response O2-l The Applicant summarizes the points raised in the preceding comments O2-b through O2-k, and concludes by saying that the Proposed Project should be identified as the Environmentally Superior Alternative. As discussed in Responses O2-b through O2-j, above, the Applicant has clarified various aspects of the Proposed Project and the alternatives which resulted in minor shifts in how the impacts in several resource areas were considered, or in the weight that certain resource areas should be afforded in the overall determination of the Environmentally Superior Alternative. It should be emphasized that these clarifications and refinements are insignificant modifications under CEQA in that they do not create any new significant impacts or increase the severity of a previously identified environmental impact. Rather, the clarifications and refinements result in changes to the ranking of alternatives for resource areas in which only less than significant (or less than significant with mitigation) impacts have been identified.

As described on page 5-2 of the Draft EIR, there would be significant unavoidable (Class I) impacts, although temporary, in air quality for the Proposed Project and all alternatives arising from construction emissions. As discussed above in Response O2-f, above, we agree that the amount and duration of air emissions should be considered in ranking the alternatives with the air quality resource area even though the impact would be Class I for each.

Also as noted on page 5-2 of the Draft EIR, the only other differentiating impacts are within resource areas for which only less than significant (or less than significant with mitigation) impacts have been identified. It therefore is reasonable to give greater weight to the alternative ranking within air quality (which has the only significant impact) and lesser weight to the alternative ranking within the other resource areas.

To implement this refinement in ranking the alternatives, we assigned a weighting factor to each resource area for which at least some differentiation between alternatives was discernable. Air quality was assigned the highest

weighting because it had the only significant impact. Resource areas wherein the impacts would be long term, though admittedly less than significant, were assigned the next highest weighting. Aesthetics, biological resources, and cultural resources fall into that category. Next, resources areas wherein the impacts would be short term but most noticeable to many people (i.e., noise, and transportation and traffic) were assigned the third highest weighting. And finally, resource areas wherein the impacts would be short term but generally not noticeable to many people (i.e., hazards/hazardous materials, public services, and utilities and service systems) were assigned the lowest weighting. No weighting was assigned to resources areas for which no discernable distinction could be made from the Draft EIR analysis (i.e., agriculture resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, population and housing, and recreation).

Within each weighted resource area, the alternatives (including the Proposed Project) were ranked from most favorable to least favorable based on the Draft EIR analysis and considering any refinements discussed above in Responses O2-b through O2-j. For the Farrell-Garnet Subtransmission Line, for which Alternatives 2, 3, 6, and 7 apply, the most favorable alternative was assigned a rank of 1 and the least favorable alternative was assigned a rank of 5. For the Mirage-Santa Rosa Subtransmission Line, for which only Alternative 5 applies, the most favorable alternative was assigned a rank of 1 and the least favorable alternative was assigned a rank of 2. The resource weighting and alternatives rankings were compiled in a matrix and a total weighted score was calculated for each alternative by multiplying its ranking within a resource area times the weighting of the resource area, then summing up the total for all the resource areas. In this way, the alternative with the best (lowest) overall total score is the Environmentally Superior Alternative. The ranking matrices are shown below.

Alternatives Ranking Matrix for the Farrell-Garnet Line

		/---------- Alternatives Rankings ----------/				
Resource Area	**Resource Weighting**	**Proposed Project**	**Alt. 2**	**Alt. 3**	**Alt. 6**	**Alt. 7**
Air Quality	10	1	5	4	3	2
Aesthetics	7	2	1	5	3	4
Biological Resources	7	5	4	3	2	1
Cultural Resources	7	1	5	4	3	2
Noise	5	1	4	5	3	2
Transportation and Traffic	5	1	4	5	3	2
Hazards/Hazardous Materials	1	1	5	4	3	2
Public Services	1	1	4	5	3	2
Utilities and Service Systems	1	1	5	4	3	2
Weighted Ranking		**79**	**174**	**187**	**125**	**95**

Alternatives Ranking Matrix for the Mirage-Santa Rosa Line			
Resource Area	Resource Weighting	/- Alternatives Rankings -/ Proposed Project	Alt. 5
Air Quality	10	1	2
Aesthetics	7	2	1
Biological Resources	7	2	1
Cultural Resources	7	1	2
Noise	5	1	2
Transportation and Traffic	5	1	2
Hazards/Hazardous Materials	1	1	2
Public Services	1	1	2
Utilities and Service Systems	1	1	2
Weighted Ranking		**58**	**74**

Based on the clarifications and refinements described above, the Environmentally Superior Alternative is the Proposed Project for both the Farrell-Garnet Subtransmission Line and the Mirage-Santa Rosa Subtransmission Line. Accordingly, the last paragraph under Section 5.3, *Environmentally Superior Alternative*, on Draft EIR page 5-10, has been replaced with the following paragraphs.

~~While the Proposed Project subtransmission lines would result in the least amount of transportation and traffic impacts compared to the alternatives, these impacts would be primarily short-term and would conclude at the end of construction period. Because the Alternative 5 subtransmission line would result in less long-term aesthetics, biological resources, and cultural resources impacts compared to the Proposed Project Mirage-Santa Rosa line, Alternative 5 is selected as the Environmentally Superior Alternative for the Mirage-Santa Rosa study area. With regard to the Farrell-Garnet study area, Alternative 3 would result in the least amount of long-term aesthetics and biological resources impacts compared to the Proposed Project Farrell-Garnet subtransmission line and Alternatives 2, 6, and 7; however, Alternative 7 would result in the least amount of impacts to cultural resources compared to the Proposed Project Farrell-Garnet subtransmission line and Alternatives 2, 3, and 6. After considering all impacts, and the long length of Alternative 7, Alternative 3 is selected as the Environmentally Superior Alternative for the Farrell-Garnet study area.~~

For the ranking of alternatives to support the identification of the Environmentally Superior Alternatives for each geographical study area, a weighting factor was assigned to each resource area for which at least some differentiation between alternatives was discernable. Air

quality was assigned the highest weighting because it had the only significant and unavoidable impact. Resource areas wherein the impacts would be long term, though admittedly less than significant, were assigned the next highest weighting. Aesthetics, biological resources, and cultural resources fall into that category. Resource areas wherein the impacts would be short term but most noticeable to many people (i.e., noise, and transportation and traffic) were assigned the third highest weighting. And finally, resource areas wherein the impacts would be short term but generally not noticeable to many people (i.e., hazards/hazardous materials, public services, and utilities and service systems) were assigned the lowest weighting. No weighting was assigned to resources areas for which no discernable distinction could be made from the Draft EIR analysis (i.e., agriculture resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, population and housing, and recreation).

The Proposed Project subtransmission lines would result in the least severe air quality, cultural resources, noise, transportation and traffic, hazards and hazardous materials, public services, and utilities and service systems impacts compared to the alternatives, and in the Farrell-Garnet study area the Proposed Project would result in the second least severe impacts related to aesthetics. However, the Proposed Project would result in the most severe impacts related to biological resources in both study areas and would result in the most severe impacts related to aesthetics in the Mirage-Santa Rosa study area. Because the Proposed Project subtransmission lines would result in less severe significant and unavoidable air quality construction impacts than the alternatives, with the exception of biological resources and aesthetics, and would result in less severe impacts compared to the alternatives for all of the other resource areas where a preference is identified, the Proposed Project subtransmission lines (i.e., the proposed Farrell-Garnet Subtransmission line and the Mirage-Santa Rosa Subtransmission lines) are selected as the Environmentally Superior Alternatives for both the Farrell-Garnett and Mirage-Santa Rosa study areas.

In addition, the text under Section 5.4.2, *Summary of the Environmentally Superior Alternative and its Impacts*, beginning on Draft EIR page 5-10, has been revised as follows:

The Environmentally Superior Alternatives are defined in Section 5.3 as ~~Alternative 3~~ the Proposed Project for both the Farrell-Garnet study area and ~~Alternative 5 for~~ the Mirage-Santa Rosa study area. The impacts of ~~Alternatives 3 and 5~~ the Proposed Project are defined in

each resource area's impact analysis in Sections 4.1 through 4.16, and are also summarized in Table 5-2, above. The Environmentally Superior Alternatives would each have the same short-term construction related significant and unmitigable (Class I) impacts on air quality. As discussed in Sections 4.1 through 4.16, other types of impacts would also occur under the Proposed Project, but they would be either less than significant or mitigable to less than significant levels.

Also, the text under Section 5.4.3, *Conclusion: Comparison of the Environmentally Superior Alternative with the No Project Alternative*, beginning on page 5-11, is revised as follows:

The Environmentally Superior Alternatives ~~(Alternatives 3 and 5)~~ as defined above would reduce long-term aesthetics and biological resources impacts and would have minimal long-term impacts on residences or other sensitive land uses. Under the No Project Alternative scenario, SCE may be required to construct new subtransmission and transmission lines and/or additional power generation in or near the study area to supply power to the Electrical Needs Area. It would be overly speculative for this EIR to assume where the new subtransmission and transmission facilities and/or power generation facilities would be sited; however, it is reasonable to assume that at a minimum, environmental impacts associated with the No Project Alternative scenario would not be less than those from the Environmentally Superior Alternatives. Therefore, the Environmentally Superior Alternatives are preferred over the No Project Alternative.

The third paragraph on page ES-1 has been revised as follows:

This Draft EIR has been prepared pursuant to the California Environmental Quality Act (CEQA) and considers the potential environmental impacts from the Proposed Project and identifies and evaluates a range of alternatives. Based on this evaluation and the documentation which follows, this Draft EIR identifies ~~Alternative 5~~ the Proposed Project as the Environmentally Superior Alternative for both the Mirage-Santa Rosa study area and ~~Alternative 3 as the Environmentally Superior Alternative~~ for the Farrell-Garnet study area.

The text under Section ES.4.3, *Environmentally Superior Alternative*, beginning on page ES-20, is revised as follows:

Table ES-3 summarizes the environmental impact conclusions of the Proposed Project and alternatives. Implementation of the Proposed

Project and all five alternatives would result in significant and unmitigable (Class I) impacts on air quality during construction~~.~~, ~~A~~although impacts to air quality would be of varying degrees (i.e., alternatives with an underground component would be slightly more adverse than the Proposed Project due to emissions during trenching activities~~), the impacts would be short term and temporary in nature; therefore, impacts of slightly varying degree between alternatives is not material enough to determine a preferred alternative from an air quality perspective~~.

~~However, impacts to aesthetics, biological resources, cultural resources, and traffic and transportation, while all mitigable to less than significant, do vary enough to determine a preferred alternative from the perspective of these issue areas. Consequently, the selection of an Environmentally Superior Alternative is based on differences in intensity and type of impacts that would be less than significant with mitigation. Based on these differences the identified Environmentally Superior Alternative for the Farrell-Garnett study area is Alternative 3 and the identified Environmentally Superior Alternative for the Mirage-Santa Rosa study area is Alternative 5.~~

To determine the Environmentally Superior Alternative, resource weighting factors were assigned and a ranking matrix was used to calculate a weighted score for the Proposed Project and each alternative. The Proposed Project subtransmission lines would result in the least severe air quality, cultural resources, noise, transportation and traffic, hazards and hazardous materials, public services, and utilities and service systems impacts compared to the alternatives, and in the Farrell-Garnet study area the Proposed Project would result in the second least severe impacts related to aesthetics. However, the Proposed Project would result in the most severe impacts related to biological resources in both study areas and would result in the most severe impacts related to aesthetics in the Mirage-Santa Rosa study area. Because the Proposed Project subtransmission lines would result in less severe significant and unavoidable air quality construction impacts than the alternatives, with the exception of biological resources and aesthetics, and would result in less severe impacts compared to the alternatives for all of the other resource areas where a preference is identified, the Proposed Project subtransmission lines (i.e., the proposed Farrell-Garnet Subtransmission line and the Mirage-Santa Rosa Subtransmission lines) are selected as the Environmentally Superior Alternatives for both the Farrell-Garnett and Mirage-Santa Rosa study areas.

The text under Section ES.4.4, *Environmentally Superior Alternative vs. No Project Alternative*, beginning on page ES-21, is revised as follows:

> The Environmentally Superior Alternatives ~~(Alternatives 3 and 5)~~ as defined above would reduce long-term aesthetics and biological resources impacts and would have minimal long-term impacts on residences or other sensitive land uses. Under the No Project Alternative scenario, SCE may be required to construct new subtransmission and transmission lines and/or additional power generation in or near the study area to supply power to the Electrical Needs Area. It would be overly speculative for this EIR to assume where the new subtransmission and transmission facilities and/or power generation facilities would be sited; however, it is reasonable to assume that at a minimum, environmental impacts associated with the No Project Alternative scenario would not be less than those from the Environmentally Superior Alternatives. Therefore, the Environmentally Superior Alternatives are preferred over the No Project Alternative.

Tables 5-2 and ES-4 have been revised accordingly and are included in Section 5 of this Response to Comments document.

Specific Comments

Response O2-1 The Applicant correctly notes that General Order (GO) 131-D states that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. The Applicant requests that the GO 131-D preemption language be inserted in all Draft EIR resource sections that include discussion of local plans, policies, and ordinances.

It is unnecessary to place the same insert in each resource section; rather, a single insert has been made in Section 4.0, *Introduction to Environmental Analysis,* at the bottom of Page 4-2, as follows:

> With regard to the discussion of local plans, policies, and ordinances in each of the resource sections 4.1 through 4.16, CPUC General Order 131-D clarifies that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters. In instances where the public utilities and local agencies are unable to resolve their differences, the Commission shall

set a hearing no later than 30 days after the utility or local agency has notified the Commission of the inability to reach agreement on land use matters.

Response O2-2 In response to the clarification provided by the Applicant, the first sentence in the Executive Summary under ES.1.1 on page ES-1 has been clarified as follows:

> The Proposed Project consists of a number of distinct project components that together make up the entire Proposed Project, including two new 115 kV subtransmission lines, ~~three~~ seven 115 kV subtransmission line reconfigurations, a 220 kV transmission line loop-in, substation modifications, . . .

Response O2-3 Figures ES-1 and ES-2 have been revised to show that Alternative 3 would continue into Farrell Substation. The revised figures are included in Section 5 of this Response to Comments document.

Response O2-4 The second bullet under Mirage Substation in Table ES-1 has been revised as follows:

- Install five new 220 kV circuit breakers and ~~five~~ three new 115 kV circuit breakers

Response O2-5 The first bullet under Santa Rosa Substation in Table ES-1 has been replaced with two bullets for clarity:

- ~~Connect the Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line and the new Mirage-Santa Rosa 115 kV subtransmission line~~
- Convert the existing Santa Rosa-Garnet 115 kV subtransmission line to the new Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line
- Convert the existing Santa Rosa-Tamarisk 115 kV subtransmission line to the new Mirage-Santa Rosa 115kV subtransmission line

Response O2-6 The first bullet under Thornhill Substation in Table ES-1 has been revised as follows:

- ~~Install the new Devers-Eisenhower-Thornhill 115 kV subtransmission line~~ Convert the existing Thornhill-Tamarisk 115kV subtransmission line to the new Devers-Eisenhower-Thornhill 115kV subtransmission line

Response O2-7 The fifth bullet under Mirage Substation in Table ES-1 has been revised as follows:

- Install the new Mirage-Santa Rosa 115 kV subtransmission line and relocate the existing Mirage-Concho and Mirage-Tamarisk 115 kV subtransmission lines

Response O2-8 The Applicant has requested that Table ES-4 in the Executive summary be revised to reflect the Applicant's assessment of potential impacts to paleontological, cultural, and archaeological resources due to undergrounding. It is noted that a number of minor refinements to the Proposed Project and Alternatives (identified in Comments O2-10 through O2-32, below) have resulted in the need to update Table ES-4 for several resource areas. The revised table is included in Section 5 of this Response to Comments document.

Response O2-9 The text on page 1-2 in Section 1.2, *Project Objectives, Purpose and Need*, has been clarified as follows:

> Splitting the existing 115 kV system is necessary to relieve thermal overload conditions on the ~~existing~~ Mirage-Concho ~~leg of the Devers-Capwind-Concho-Mirage~~ 115 kV ~~subtransmission line~~ and ~~the~~ Mirage-Tamarisk 115 kV subtransmission lines.

Response O2-10 The first bullet on page 2-13 has been clarified as follows:

- Split the existing Garnet-Santa Rosa 115 kV subtransmission line at the intersection of Bob Hope Drive and Dinah Shore Drive by removing the span of wire that connects the southwest and northeast corner poles and transfer it to the southeast corner pole (see Figure 2-5, *Existing and Proposed 115 kV Line Configurations at Bob Hope and Dinah Shore Drives*).

Response O2-11 The second bullet on page 2-13 has been clarified as follows:

- Split the Santa Rosa-Tamarisk at the same intersection by dead-ending and grounding the Santa Rosa leg at the ~~northwest~~ southeast corner pole. The portion of the Santa Rosa-Tamarisk line between Bob Hope Drive east to Portola Avenue would become idle.

Response O2-12 The third bullet on page 2-13 has been clarified as follows:

- Connect the open Tamarisk leg of the existing Santa Rosa-Tamarisk 115 kV subtransmission line to the open Garnet leg of the existing Garnet-Santa Rosa 115 kV subtransmission line at the ~~northwest~~ southeast corner pole of Bob Hope Drive and Dinah Shore Drive.

Response O2-13 The Applicant has provided an updated drawing depicting the changed conductor configuration at Bob Hope and Dinah Shore Drives (Figure 2-5 in the Draft EIR). The updated drawing is provided as Attachment 2 to Comment Letter O2. No substantive changes to the environmental analysis are made necessary by this minor change.

Response O2-14 The first bullet on page 2-18 has been clarified as follows:

- Install a span of conductor between the existing north segment of the Garnet-Santa Rosa 115 kV subtransmission line and the existing west segment of the Santa Rosa-Tamarisk 115 kV subtransmission line at the ~~northwest~~ southeast corner of Bob Hope Drive and Dinah Shore Drive.

Response O2-15 The Applicant has provided an updated drawing depicting the changed TSP profile at Bob Hope Drive (Figure 2-8 in the Draft EIR). The updated drawing is provided as Attachment 3 to Comment Letter O2. No substantive changes to the environmental analysis are made necessary by this minor change.

Response O2-16 The third full paragraph on page 2-22 has been clarified as follows:

> The TSPs would be installed on top of cylindrical concrete footings approximately six to eight feet in diameter and ~~approximately 20 to 25~~ at least 22 feet deep. After holes for the footings have been bored, a steel rebar cage would be inserted into the hole, and then concrete would be poured into the hole to a level up to two feet above the ground surface. After the concrete has cured, the TSP would be bolted onto the footing. Excess bore spoils would be distributed at each pole site, used as backfill to fill holes left after removal of nearby wood poles, or removed from the pole sites.

Response O2-17 The fourth paragraph on page 2-22 has been clarified as follows:

> ~~Both LWS poles and TSPs consist of separate base and top sections for ease of construction. Steel pole installation would begin by transporting the poles from the staging area and laying the individual sections on the ground at each new pole location. While on the ground, the top section would be pre-configured with the necessary insulators and wire-stringing hardware. A line truck with a boom on it for LWS poles, or a crane for TSPs would be used to position each pole base section into previously augured holes for the LWS poles or on top of previously prepared foundations for the TSPs. When the base section is secured, the top section would be placed above the base section. The two sections may be spot-welded together for additional stability.~~

While on the ground, the top and bottom sections of the LWS poles would be pulled together and preconfigured with the necessary insulators and wire stringing hardware. For LWS poles, a line truck with a boom on it would be used to position each pole into previously augured holes.

The TSPs would require a crane to set the pole bases on top of previously installed concrete foundations. Once secured, the top, and if necessary middle, sections of the TSP would then be set on the base of the TSP. For both structures, all sections may be spot welded together for added stability.

Response O2-18 The first paragraph under Conductor Pulling on page 2-23 has been clarified as follows:

~~Conductors would be installed on 115 kV polymer insulator assemblies attached to each crossarm in a horizontal configuration or suspension assemblies consisting of single polymer insulators attached to each crossarm in a vertical configuration. Overhead ground wires would be installed on the top of the steel poles.~~ Conductors would be attached to 115 kV polymer post style insulators, that would be attached to each pole head for LWS poles, and suspended, or dead ended, to steel crossarms mounted on TSPs. Depending on location, the insulator configurations may be mounted vertically, or in a triangular pattern. With the exception of certain locations near substations, the overhead ground wire would be installed in accordance with G.O. 95 Table II. Distribution lines transferred to the new steel poles would typically be installed on standard wood crossarms with polymer insulators.

Response O2-19 The second paragraph under Conductor Pulling on page 2-23 has been clarified as follows:

Conductor pulling includes all activities associated with the installation of conductors onto the LWS and wood poles and TSPs. These activities include installing three 115 kV 954 SAC conductors, one 221 kcmil ACSR ground conductor, ~~ground wire, vibration dampeners, weights, and~~ post, suspension~~,~~ ~~and~~ or dead-end hardware assemblies for the entire length of the proposed subtransmission lines.

Response O2-20 The first paragraph on page 2-41 has been clarified as follows:

Devers Substation is a staffed, 500/220/115 kV substation located in the unincorporated area of Riverside County, north of the City of Palm Springs. The proposed improvements at Devers Substation include the conversion of Devers-Mirage 220 kV transmission line to Devers-

Mirage No. 1 220 kV transmission line, reconfiguration of the Coachella Valley-Devers 220 kV transmission line to the Devers-Mirage No. 2 220 kV transmission line, relay upgrades, replacement of two 115 kV circuit breakers in existing Position No. 7 for the new Devers-Eisenhower-Thornhill 115 kV subtransmission line and replacement of two 115 kV circuit breakers in existing Position No. 4 for the new Mirage-Capwind-Devers-Tamarisk 115 kV subtransmission line. Improvements at the substation would also include installation of new line-protection relays.

Response O2-21 The first bullet on page 2-41 has been clarified as follows:

- Four 115 kV, 1,200 Amp, 40 kilo~~annum~~ Amperes (kA) duty, circuit breakers

Response O2-22 The first paragraph under Engineering Plan on page 2-42 has been clarified as follows:

Mirage Substation is an unstaffed, 220/115 kV substation located in unincorporated Riverside County in the general vicinity of the community of Thousand Palms. The proposed improvements at Mirage Substation include the installation of one 280 MVA, 220/115 kV transformer bank, one new 220 kV bank position, one new 115 kV bank position, and one new 220 kV breaker-and-a-half configuration position ~~for two new 220 kV line positions,~~ and the relocation of the existing Mirage-Ramon 220 kV transmission line, the existing Julian Hinds-Mirage 220 kV transmission line, and the existing Devers-Mirage 220 kV transmission line. Other work at the substation would include looping of the Devers-Coachella Valley 220 kV transmission line into the Mirage 220 kV switchrack, installation of the new Mirage-Santa Rosa 115 kV subtransmission line, relocation of existing Mirage-Concho 115 kV subtransmission line, renaming the existing Mirage-Capwind-Devers 115 kV subtransmission line to Mirage-Capwind-Tamarisk-Devers 115 kV subtransmission line, renaming the Mirage-Concho 115 kV subtransmission line to Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line, and installation of new line protection relays.

Response O2-23 This text clarification has been included in Response O2-22, above.

Response O2-24 The bullets under Major Equipment on page 2-42 have been clarified as follows:

Major Equipment

- One 280 MVA 220/115 kV transformer bank;
- Five 220 kV, 3,000 amp, 50 kA duty, circuit breakers;

- Ten 220 kV, 3,000 amp, center-side-break disconnect switches;
- ~~Fifteen~~ Eighteen 220 kV station post insulators;
- ~~Six 220 kV metering potential transformers~~ Three 220 kV coupling capacitor voltage transformers;
- Three 220 kV metering units;
- Two 115 kV, 3,000 amp, 40 kA duty circuit breakers;
- ~~Three~~ One 115 kV, 2,000 amp, 40 kA duty circuit breakers;
- Four 115 kV, 3,000 amp, center-side-break disconnect switches;
- ~~Six~~ Two 115 kV, 2,000 amp, center-side-break disconnect switches;
- ~~Nine~~ Six 115 kV potential transformers; and
- ~~Twenty-seven~~ Twelve 115 kV post insulators.

Response O2-25 The bullets under Switchrack Configurations on page 2-42 to 2-43 have been clarified as follows:

Switchrack Configurations

- One new 220 kV transformer bank position No. 6S designed with a double-breaker configuration;
- One new 220 kV line position No. 5 designed with a breaker-and-a-half configuration for relocation of the existing Julian Hinds-Mirage 220 kV transmission line (Pos. No. 5N) and relocation of the existing Mirage-Ramon 220 kV transmission line (Pos. No. 5S);
- Renaming the Devers-Mirage 220 kV transmission line to Devers-Mirage No. 1 transmission line;
- Existing 220 kV transmission line Position No. 3 would be upgraded and remain a breaker-and-a-half configuration for the installation of the new Devers-Mirage No. 2 220 kV transmission line (Pos. No. 3N) and the installation of the new Mirage-Coachella Valley 220 kV transmission line (Pos. No. 3S);
- Existing Tamarisk 115 kV subtransmission line would be relocated to line position 1N to create the Devers-Capwind-Mirage-Tamarisk 115 kV subtransmission line;
- Vacated existing line position No. 1S would be for the new Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line;
- One new 115 kV transformer bank position (No. 6N) designed with a double-breaker configuration;
- ~~One new 115 kV line position (No. 7N) designed with a double-breaker configuration; and~~
- Convert existing 115 kV line position (No. 4) from a double-breaker configuration to a breaker-and-a-half configuration for relocated Concho 115 kV line Position (No. 4S) and new Santa Rosa 115 kV line Position (No. 4N); and
- Install one 220/115 kV transformer bank.

Response O2-26 This text clarification has been included in Response O2-25, above.

Response O2-27 This text clarification has been included in Response O2-25, above.

Response O2-28 The first paragraph under Construction Plan on page 2-59 has been clarified as follows:

> The existing fiber optic cables would be transferred from existing poles to the new 115 kV subtransmission poles that would be installed within existing ROWs or franchise locations. The All-Dielectric Self-Supporting (ADSS) fiber optic cables would be attached to a support block beneath the end of each 10-foot wood cross-arm on each new pole as shown in Figure 2-3. Telecommunications equipment installation would occur within existing SCE substation buildings and at the Edom Hill Communications Site. IID equipment and circuit installation ~~would occur at~~ is expected to be in the IID's mechanical-electrical equipment room (MEER).

Response O2-29 The typographical error in Table 2-7 on page 2-60 has been corrected as follows:

Indian Wells, Equipment/Circuit Installation			
Equipment Installation	3	~~35~~ 5	2 – Pick-Up (Gasoline)

Response O2-30 The last sentence in the second paragraph under Electric and Magnetic Fields on page 2-62 has been corrected as follows:

> Additional information on electric and magnetic fields generated by transmission lines is presented in Appendix ~~D~~ B.

Response O2-31 The third paragraph under Electric and Magnetic Fields on page 2-62 has been corrected as follows:

> After several decades of study regarding potential public health risks from exposure to power line EMF, research results remains inconclusive. Several national and international panels have conducted reviews of data from multiple studies and state that there is not sufficient evidence to conclude that EMF causes cancer. Most recently the World Health Organization (WHO) International Agency for Research on Cancer (IARC) and the California Department of Health Services (DHS) both classified EMF as a *possible* carcinogen.

Response O2-32 The Applicant has made an engineering refinement to Alternative 2 to be in compliance with FAA regulations. Accordingly, the text in the first

paragraph, third sentence on page 3-13 (Section 3.4.2, *Alternative 2*) has been revised as follows:

> At Sunrise Way, the line would turn north, and proceed along Sunrise Way to approximately 1,265 feet north of Four Seasons Boulevard, where the underground segment would end and the subtransmission line would transition to overhead at a riser pole . . .

Response O2-33 The second sentence of Mitigation Measure 4.1-6 has been revised as follows to provide a more reasonable lead time for submission of the Construction Lighting Mitigation Plan. The same revision has been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> SCE shall submit a *Construction Lighting Mitigation Plan* to the CPUC for review and approval at least ~~90~~ 30 days prior to the start of nighttime construction or the ordering of any exterior lighting fixtures or components, whichever comes first.

Response O2-34 Mitigation Measure 4.1-8 has been revised as follows to allow for the possibility that some equipment may not be commercially available in non-specular finish. The same revision has been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> **Mitigation Measure 4.1-8:** ~~A non-reflective or weathered finish shall be applied to all~~ All new structures and equipment installed at the Devers, Mirage, Concho, Indian Wells, Santa Rosa, Eisenhower, Farrell, Garnet, Thornhill, and Tamarisk Substations shall have non-specular (reduced glare) surface finishes, except for structures or equipment for which such finishes are not commercially available ~~to reduce potential glare effects~~.

Response O2-35 A description of Indian Canyon Drive has been added to the Local Major Roadways discussion at the bottom of page 4.1-3 of Section 4.1, *Aesthetics*, as follows:

> **Indian Canyon Drive.** Indian Canyon Drive is an existing north-south roadway into Palm Springs with access from/to the I-10. Views from this roadway include open space and the San Jacinto Mountains.

Response O2-36 The following discussion of potential impacts to recreational users of Desert Highland Park that would occur under Alternative 3 has been added after the first whole paragraph on Draft EIR page 4.1-50:

> Recreational viewers potentially affected by the Alternative 3 subtransmission line would include those associated with Desert

Highland Park, located approximately 0.3 mile west of where the Alternative 3 subtransmission line would be located along Indian Canyon Drive and approximately 0.6 mile northwest of the where the Alternative 3 riser pole would be located. Views of the subtransmission line and riser pole would be achieved from certain locations at the east side of the park and would range from partially to fully screened, dependent on the presence of the recreational facilities and vegetation at the park. Therefore, visual sensitivity would be low, overall visual change would be low, and impacts would be less than significant requiring no mitigation (Class III). Visual impacts to recreational viewers that would be associated with Alterative 3 at the Desert Highland Park would be approximately the same as those that would be associated with the proposed Farrell-Garnet subtransmission line at Palm Springs Country Club Golf Course.

Response O2-37 Figure 4.1-1 in Section 4.1, *Aesthetics,* has been updated and clarified. The updated figure is included in Section 5 of this Response to Comments document.

Response O2-38 The Applicant asserts that the SCAQMD methodology should be followed for determining the significance of the Proposed Project's GHG emissions, and doing so would eliminate the need for Mitigation Measure 4.3-6. However, as the lead agency under CEQA, the CPUC has the authority to establish its own significance criteria and assessment methodology to ensure that the cumulative impacts of a project's GHG emissions are reduced to a less than significant level. Page 4.3-35 of Section 4.3, *Air Quality*, clearly lays out the three considerations the CPUC has taken to evaluate the GHG emissions from this project. The third consideration in that list is "The project's potential to conflict with GHG reduction goals set forth in AB32." The Draft EIR analysis for this consideration is clearly stated at the bottom of page 4.3-37: "While the annualized GHG emissions associated with the Proposed Project would be substantially less than CARB's preliminary draft threshold amount of 7,000 metric tons CO_2e, significance for this project is also based on whether the Proposed Project would be consistent with the State's GHG reduction goal under AB 32, which would require a minimum reduction of 30 percent of GHG emissions by 2020 compared to business as usual conditions." The analysis concludes that Mitigation Measure 4.3-6 is necessary to ensure that the Proposed Project is consistent with the GHG reduction goals set forth in AB32. Because the Draft EIR clearly laid out the evaluation criteria, and it followed a documented methodology for assessing the Proposed Project's GHG emissions against those criteria, no changes will be made in the Draft EIR approach for determining GHG significance and Mitigation Measure 4.3-6 will remain.

However, it should be noted that Mitigation Measure 4.3-6 allows the Applicant to submit to the CPUC a finalized calculation of net GHG emission increases and a determination of the amount to be offset. This provides the Applicant with the opportunity to refine not only the GHG emission calculations in the Draft EIR to account for final engineering design and construction plans, but also to refine the calculations for the net increase over business as usual.

Response O2-39 The Applicant's requested change to Table 4.4-1 regarding the proposed critical habitat for the Casey's June beetle being more than five miles away from the project area is unnecessary. The table already concludes a Low Potential for the beetle because there have been no recent records for that species in the project vicinity.

Response O2-40 The Applicant requests that Table 4.4-1 be revised to reflect that the flat-tailed horned lizard has recently been changed to a Federal Candidate Endangered Species. This is not correct. According to the most recent (January 2010) update of the *State and Federally Listed Endangered & Threatened Animals of California*, published by the State of California Department of Fish and Game, the flat-tailed horned lizard has no Federal listing or candidate status. This species had previously been listed as a Federally Proposed Threatened species by the USFWS, but the USFWS determined that the proposed listing was not warranted and the proposed rule was withdrawn on June 28, 2006. Therefore, no changes to Table 4.4-1 are required for this species.

Response O2-41 Please see Response O2-40, above. No changes to the text are required.

Response O2-42 Please see Response O2-40, above. No changes to the text are required.

Response O2-43 The last sentence in the 2nd paragraph of Impact 4.4-1 on page 4.4-47 of the Draft EIR is clarified as follows.

> Although this location is predominantly composed of ruderal species, and no CV milkvetch was observed during the spring and summer 2009 surveys, there is still potential for this species to occur.

The last sentence in the 3rd paragraph of Impact 4.4-1 on page 4.4-47 of the Draft EIR is clarified as follows.

> Although both of these locations are currently predominantly composed of ruderal species, and no CV milkvetch was observed during the spring and summer 2009 surveys, there is still potential for the CV milkvetch to occur.

Response O2-44 In response to this comment, the second paragraph of Mitigation Measure 4.4-1 on page 4.4-48 of the Draft EIR has been clarified as shown below. The same clarification has been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> Temporary and permanent impacts to habitat for the CV milkvetch shall be compensated for through conservation of suitable habitat for this species. The calculated replacement for habitat loss for the CV milkvetch shall be based on a ratio of 3:1 (compensation to impact) per acre for temporary impacts and 9:1 for permanent impacts, for an estimated total of 6 acres. These ratios ~~Ratios~~ reflect the limited habitat and low populations of this species across its range, and the loss of habitat available for this species in the project area, and are consistent with compensation ratios established in the CVMSHCP. Greater or lesser compensation ratios may be substituted as determined though USFWS and CDFG consultation and/or permitting, considering the quality of the habitat being affected. The replacement habitat shall be within the Whitewater Floodplain Conservation Area of the CVMSHCP. Total compensation funds shall include the costs of acquisition and long-term management, and shall be paid prior to the start of project operations. This replacement habitat shall mitigate for both direct and indirect impacts of construction and operations/management on this species, as well as the CV fringe-toed lizard (see Mitigation Measure 4.4-2, below), Palm Springs pocket mouse, Palm Springs round-tailed ground squirrel, CV giant sand-treader cricket, and Le Conte's thrasher.

Response O2-45 The first sentence of the third bullet of Mitigation Measure 4.4-2 on page 4.4-50 is clarified as shown below. The same clarification has been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> - SCE and/or its construction contractors shall retain and have available, the services of a ~~CPUC authorized~~ qualified biologist who shall perform the duties of the biological monitor.

Response O2-46 In response to this comment, the final bullet of Mitigation Measure 4.4-2 on page 4.4-51 has been clarified as shown below. The same clarification has been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> - Temporary and permanent impacts to CV fringe-toed lizard habitat shall be mitigated through conservation of suitable habitat for this species. The calculated replacement for habitat loss for this species shall be based on a ratio of 3:1 (compensation to impact) per acre for temporary impacts and 9:1 for permanent impacts, for an estimated total of 6 acres. These ratios ~~Ratios~~ reflect the limited habitat and low populations of

this species across its range, and include both the loss of habitat use by the species, and the adverse effect of raptor predation caused by the new raptor perch availability at the new poles, and are consistent with compensation ratios established in the CVMSHCP. Greater or lesser compensation ratios may be substituted as determined though USFWS and CDFG consultation and/or permitting, considering the quality of the habitat being affected. The replacement habitat shall be within the Whitewater Floodplain Conservation Area of the CVMSHCP. Total compensation funds shall include the costs of acquisition and long-term management, and shall be paid prior to the start of Proposed Project operations. This replacement habitat shall mitigate for both direct and indirect impacts of construction and operations/management on this species, as well as the Palm Springs pocket mouse, Palm Springs round-tailed ground squirrel, CV giant sand-treader cricket, Le Conte's thrasher, flat-tailed horned lizard, and CV milkvetch (habitat conserved through this measure may be the same as that conserved through Mitigation Measure 4.4-1 for the CV milkvetch).

Response O2-47 The Applicant requests that a discussion be added to Impact 4.4-8 on page 4.4-56 regarding the role of sand fences as perches for raptors and other avian predators. However, the discussion in Impact 4.4-8 deals with new structures being added as part of the Proposed Project. The presence of sand fences is part of the existing baseline, and the Proposed Project would neither add nor remove any sand fences. So a discussion of the role of sand fences as perches for avian predators would be purely academic and would not affect the analysis or conclusions regarding the new structures that would be added by the Proposed Project.

Response O2-48 The Applicant asserts that the term "wetlands" is incorrect and misleading and requests that the term "wetlands" be changed to "jurisdictional waters." However, we note that the Applicant used the term "Jurisdictional Wetlands" in its own Applicant Proposed Measure (APM) BIO-3 (see Draft EIR page 4.4-42), so that term was used for consistency in this impact discussion.

Response O2-49 The second sentence of the fifth bullet of Mitigation Measure 4.4-2 on page 4.4-51 is clarified as shown below. The same clarification has been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> Each plant that is destroyed due to construction in the ROW along the east and west side of Gene Autry Trail roadway shall be replaced and monitored for at least ~~ten~~ five years, or other period of time approved by the USFWS, . . .

Response O2-50 In response to this comment, the first bullet of Mitigation Measure 4.4-10 on page 4.4-58 has been clarified as shown below. The same clarification has been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

- Purchase or dedication of land to provide wetland preservation, restoration, or creation. If restoration is available and feasible, then a mitigation replacement ratio of at least 2:1 shall be used. If a wetland needs to be created, at least a 3:1 ratio shall be implemented to offset losses. Where practical and feasible, onsite mitigation shall be implemented. Greater or lesser offset ratios may be substituted through consultation and/or permitting with the appropriate wildlife agency (USFWS or CDFG).

Response O2-51 The clarifications to Mitigation Measures 4.4-1 and 4.4-2, described above in Response O2-44 and O2-46, respectively, provide the ability to have lower compensation ratios based on habitat quality.

Response O2-52 In order to more clearly state the rational for the list of cultural resources discussed in the Draft EIR, the introduction to the Findings discussion on page 4.5-7 is clarified as follows:

Findings

The cultural resources records search revealed the presence of the following five previously recorded cultural resources within a 0.5-mile radius of the APE for the proposed and alternative alignments.

Also, the first sentence of the first indented paragraph under Findings on page 4.5-7 is clarified as follows:

Hoon wit ten ca va (Garnet Hill). This resource is located within the viewshed but outside the physical APE for the proposed overhead Farrell-Garnet 115 kV subtransmission line alignment and the Alternative 3 alignment, but is within the APE for the Alternative 2 alignment.

Response O2-53 The first sentence of the first full paragraph on page 4.5-8 is clarified as follows:

33-8408 (Varner Road). This resource is located within the viewshed but outside the physical APE for the proposed overhead reconfigured Mirage-Capwind-Devers-Tamarisk 115 kV line~~,~~ and the proposed overhead Mirage-Santa Rosa 115 kV subtransmission line alignment~~s, and Alternative 5, 6 and 7 alignments~~.

Response O2-54 The first sentence of the last paragraph on page 4.5-8 is clarified as follows:

> **33-9498/CA-RIV-6381H (Southern Pacific Railroad/Union Pacific Railroad line).** This resource was relocated during the 2009 archaeological survey and is within the viewshed of but outside the physical APE for the proposed overhead Farrell-Garnet 115 kV alignment and the proposed overhead Mirage-Santa Rosa 115 kV alignment ~~and alternative subtransmission line alignments and was relocated during the 2009 archaeological survey~~.

Response O2-55 The first sentence of the first indented paragraph on page 4.5-9 is clarified as follows:

> **33-15429.** This resource is known to be located adjacent to and outside of ~~within~~ the APE for the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment.

Response O2-56 The first sentence of the second indented paragraph on page 4.5-9 is clarified as follows:

> **33-15430.** This resource is located within the viewshed but outside the physical APE for the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment.

Response O2-57 The third paragraph under checklist questions a, b) on Draft EIR page 4.5-23 has been replaced with the following paragraphs to be consistent with the changes made above (see Responses O2-52 through O2-56). Note that the paragraphs below are not exactly those suggested by the Applicant due to a few inconsistencies and errors in the Applicant's suggested revisions. For example, the first sentence of the third paragraph of the suggested revisions indicates that archaeological site 33-15429 would not be impacted by the Proposed Project, which is in direct conflict with the first sentence of the fourth paragraph of the suggested revisions. Therefore, the revisions to the Draft EIR include no changes with regard to the potential for impacts at site 33-15429.

> ~~Historic resource 33-4808 (Varner Road), Native American cultural resource *Hoon wit ten ca va* and prehistoric archaeological sites CA-RIV-785, 33-15429, and 33-15430, could be impacted by the Proposed Project. Impacts are described in detail below.~~
>
> Historic resource 33-4808 (Varner Road) would not be impacted by the Proposed Project. It would be spanned by the proposed overhead reconfigured Mirage-Capwind-Devers-Tamarisk 115 kV line and the proposed overhead Mirage-Santa Rosa 115 kV subtransmission line,

and no ground-disturbing activity would occur within the roadway. Therefore, there would be no impacts to this resource (No Impact).

Native American cultural resource *Hoon wit ten ca va* (Garnet Hill) would not be physically impacted by the Proposed Project. The proposed Farrell-Garnet 115 kV line would be installed overhead on poles constructed along an existing dirt road north of Garnet Hill, and no ground disturbing activity would occur within the limits of this topographical feature. For the potential indirect impacts to this resource, see the Impact 4.5-2 discussion.

The proposed Mirage-Santa Rosa 115 kV line would be constructed on overhead poles west of 33-15429 and east of 33-15430, and all access would be from an existing dirt road located immediately west of the poles that currently carry the Mirage-Tamarisk and Mirage-Concho lines, which in this area would be reconfigured using the dirt access road for access. Prehistoric archaeological site 33-15429 would not be directly impacted by the Proposed Project. The resource is located east of the existing subtransmission line and adjacent to and outside of the APE for the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment. However, it is not known if there is a subsurface component to this resource, and if so, whether it might extend into the area that is within the Proposed Project's APE. Prehistoric archaeological site 33-15430 would not be impacted by the Proposed Project.

Prehistoric archaeological site CA-RIV-785 could be impacted by the Proposed Project. A portion of it is located within the APE for the proposed Mirage-Santa Rosa 115 kV line.

Response O2-58 The Impact 4.5-1 heading on Draft EIR page 4.5-23 has been revised as follows to indicate that there would be no direct impact associated with the Proposed Project to historic site 33-8408, Varner Road.

~~Impact 4.5-1: Project construction could adversely affect historic site 33-8408, Varner Road. *Less than significant* (Class III)~~

The last sentence of the second paragraph on Draft EIR page 4.5-24 has been revised as follows to indicate that there would no direct impact associated with the Proposed Project to historic site 33-8408, Varner Road.

~~Impacts~~ There would be no impact to Varner Road at this location ~~would be less than significant~~.

Impact 4.5-1 in the Executive Summary Table ES-5 on Draft EIR page ES-24 has been removed to reflect this revision.

Cultural Resources			
~~**4.5-1:** Impacts to historic site 33-8408, Varner Road~~	~~Class III~~	~~None required~~	~~Less than Significant~~

Response O2-59 Although SCE's PEA indicates that the Proposed Project would potentially impact site 33-15430 (see PEA page 4.5-11, third paragraph), the CPUC concurs with SCE's current assessment of site 33-15430 in that it is located outside of the APE for the Proposed Project and would consequently not be impacted by the Proposed Project. Therefore, Draft EIR Impact 4.5-3 and associated mitigation measures have been revised as indicated below to delete discussion of site 33-15430.

The title of Impact 4.5-3, which appears on Draft EIR page 4.5-25 has been renamed as follows.

> **Impact 4.5-3: Project construction could adversely affect cultural resources CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~. *Less than Significant with Mitigation* (Class II)**

The second paragraph on Draft EIR page 4.5-26 has been revised as follows.

> Construction of the proposed Mirage-Santa Rosa 115 kV subtransmission line could also impact site~~s~~ 33-15429~~ and 33-15430~~. ~~These sites~~ This site may be related to site CA-RIV-785 and may be eligible for listing in the NRHP and CRHR under Criterion D/4, ability to provide information important to prehistory. ~~Neither site, however~~ However, the site does not appear~~s~~ to be within the direct APE for the proposed alignment. ~~These sites~~ This site should be avoided to ensure that any adverse effects are minimized. Implementation of APM CUL-3 (Construction Monitoring) as well as Mitigation Measures 4.5-3a, 4.5-3b, and 4.5-3c would reduce potential impacts to less than significant.

Mitigation Measures 4.5-3a and 4.5-3b on Draft EIR page 4.5-26 has been revised as follows. The same revisions have been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> **Mitigation Measure 4.5-3a: Avoid and protect archaeological resources.** SCE shall narrow the construction zone to avoid potentially significant archaeological resources CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~ if feasible. The resources shall be designated as Environmentally Sensitive Areas (ESAs) to ensure avoidance. Protective

fencing or other markers shall be erected around ESAs prior to any ground disturbing activities; however, such ESAs shall not be identified specifically as cultural resources, in order to protect sensitive information and to discourage unauthorized disturbance or collection of artifacts.

Mitigation Measure 4.5-3b: Preparation of treatment plan if avoidance is not feasible. If avoidance of sites CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~ is not feasible, prior to issuing any grading or excavation permits and prior to any project-related ground disturbing activities, a detailed Historic Properties Treatment Plan (HPTP) shall be prepared...

Response O2-60 The following paragraphs under the Alternative 2 impact discussion on Draft EIR page 4.5-31 have been revised as follows to reflect direct impacts under Alternative 2 to *Hoon wit ten ca va* (Garnet Hill) as well as the higher severity of impacts under Alternative 2 that would be associated with trenching for the underground line.

Similar to the proposed Farrell-Garnet 115 kV alignment, the Alternative 2 alignment could potentially impact previously recorded resource, *Hoon wit ten ca va* (Garnet Hill). However, unlike the proposed Farrell-Garnet 115 kV alignment, *Hoon wit ten ca va* (Garnet Hill) would be directly impacted by Alternative 2 because the Alternative 2 alignment would be located on the resource. This resource appears significant to the oral histories of the Cahuilla Indian Tribe and may be considered a TCP. Construction of Alternative 2 could result in impacts to *Hoon wit ten ca va* (Garnet Hill). Potential impacts to the resource would be mitigated to a less-than-significant level through the implementation of APM CUL-1 and CUL-6 as well as Mitigation Measure 4.5-2, described above for the proposed Farrell-Garnet 115 kV subtransmission line (Class II). This impact would be more severe under Alternative 2 compared to the proposed Farrell-Garnet 115 kV alignment.

As with the proposed Farrell-Garnet 115 kV alignment, impacts associated with Alternative 2 related to undiscovered cultural resources would be less than significant with implementation of Mitigation Measures 4.5-4a, 4.5-4b and 4.5-4c (Class II). However, due to the increased ground disturbance that would occur under Alternative 2 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 2 compared to the proposed Farrell-Garnet 115 kV alignment.

Impacts to paleontological resources that would be associated with Alternative 2 would ~~be essentially~~ have the same impact class as those that would result under construction of the proposed Farrell-Garnet subtransmission line. With implementation of APMs PA-1 through PA-6, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 2 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 2 compared to the proposed Farrell-Garnet 115 kV alignment.

The potential impacts to human remains that would be associated with Alternative 2 would ~~be essentially~~ have the same impact class as those that would result during construction of the proposed Farrell-Garnet subtransmission line. Therefore, with implementation of APM CUL-2, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 2 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 2 compared to the proposed Farrell-Garnet 115 kV alignment.

The following paragraphs under the Alternative 3 impact discussion on Draft EIR page 4.5-32 have been revised to reflect the higher severity of impacts under Alternative 3 that would be associated with trenching for the underground line.

As with the proposed Farrell-Garnet 115 kV subtransmission line, construction impacts associated with Alternative 3 related to undiscovered cultural resources would be less than significant with implementation of Mitigation Measures 4.5-4a, 4.5-4b, and 4.5-4c (Class II). However, due to the increased ground disturbance that would occur under Alternative 3 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 3 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

Impacts to paleontological resources that would be associated with Alternative 3 would ~~be essentially~~ have the same impact class as those that would result under construction the proposed Farrell-Garnet 115 kV subtransmission line. With implementation of APMs PA-1 through PA-6, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 3 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 3 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

The potential impact to human remains that would be associated with construction of Alternative 3 would ~~be essentially~~ have the same impact class as those that would result during construction of the proposed Farrell-Garnet 115 kV subtransmission line. Therefore, with implementation of APM CUL-2, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 3 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 3 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

The following paragraphs under the Alternative 5 impact discussion on Draft EIR page 4.5-33 have been revised as follows to reflect the higher severity of impacts under Alternative 5 that would be associated with trenching for the underground line.

As with the proposed Mirage-Santa Rosa 115 kV subtransmission line, impacts associated with construction of Alternative 5 related to undiscovered cultural resources would be less than significant with implementation of Mitigation Measures 4.5-4a, 4.5-4b and 4.5-4c (Class II). However, due to the increased ground disturbance that would occur under Alternative 5 associated with trenching for the underground line, this impact would be more severe under Alternative 5 compared to the proposed Mirage-Santa Rosa 115 kV subtransmission line.

Impacts to paleontological resources that would be associated with construction of Alternative 5 would ~~be essentially~~ have the same impact class as those that would result under the proposed Mirage-Santa Rosa 115 kV subtransmission line; impacts would be less than significant with implementation of APMs PA-1 through PA-6 (Class III). However, due to the increased ground disturbance that would occur under Alternative 5 associated with trenching for the underground line, this impact would be more severe under Alternative 5 compared to the proposed Mirage-Santa Rosa 115 kV subtransmission line.

The potential impact to human remains that would be associated with construction of Alternative 5 would ~~be essentially~~ have the same impact class as those that would result under the proposed Mirage-Santa Rosa 115 kV subtransmission line. Therefore, with implementation of APM CUL-2, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 5 associated with trenching for the underground line, this impact would be more severe under Alternative 5 compared to the proposed Mirage-Santa Rosa 115 kV subtransmission line.

The following paragraphs under the Alternative 6 impact discussion on Draft EIR page 4.5-34 have been revised as follows to reflect the higher severity of impacts under Alternative 6 that would be associated with trenching for the underground line.

> Portions of the Alternative 6 alignment were not subject to systematic archaeological survey due to lack of access. These segments will be surveyed if this alternative alignment is selected, per Mitigation Measure 4.5-4c. As with the proposed Farrell-Garnet 115 kV alignment, impacts associated with Alternative 6 related to undiscovered cultural resources would be less than significant with implementation of Mitigation Measures 4.5-4a, 4.5-4b, and 4.5-4c (Class II). However, due to the increased ground disturbance that would occur under Alternative 6 associated with trenching for the underground line, this impact would be more severe under Alternative 6 compared to the proposed Farrell-Garnet 115 kV subtransmission line.
>
> Impacts to paleontological resources that would be associated with Alternative 6 would be similar to those that would result under the proposed Farrell-Garnet 115 kV subtransmission line, with the exception that Alternative 6 would not impact the high-sensitivity Imperial Formation. Impacts would be less than significant with implementation of APMs PA-1 through PA-6 (Class III). However, due to the increased ground disturbance that would occur under Alternative 6 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 6 compared to the proposed Farrell-Garnet 115 kV subtransmission line.
>
> The potential impact to human remains that would be associated with Alternative 6 would ~~be essentially~~ have the same impact class as those that would result under the proposed Farrell-Garnet 115 kV subtransmission line. Therefore, with implementation of APM CUL-2, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 6 associated with trenching for the underground line, this impact would be more severe under Alternative 6 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

Response O2-61 The first paragraph on page 4.6-2 of Section 4.6, *Geology and Soils*, is clarified as follows:

> The closest known active faults to the study area are associated with the San Andreas fault system, with the northwesterly trending Banning and Coachella segments of the fault system mapped in the north, just

north of Interstate 10 (I-10). The northwesterly trending Garnet Hill fault is mapped north of Palm Springs, about a half mile south of I-10. The Garnet Hill fault is mapped as a buried fault and is based on a gravity anomaly survey of the Coachella Valley by a major oil company (Proctor, 1968). The Garnet Hill fault is not mapped as offsetting Holocene-age materials (Jennings, 1994) and, therefore, does not display evidence of being active (Hart et al., 1979). ~~Although~~ Further, the California Division of Mines and Geology (California Geological Survey) has not designated it as an active fault, and Holocene surface rupture was not documented along the Garnet Hill fault in the vicinity of the project area (SCEDC, 2010) ~~the Garnet Hill fault can act as a plane of weakness and move in response to an earthquake on another nearby fault. Ground fractures associated with the 1986 North Palm Springs earthquake were reported along the trace of the Garnet Hill fault and indicate that a near-surface response of weak surfaces occurred at depth (City of Cathedral City, 2002)~~. The north-south trending Palm Canyon fault is mapped as trending towards Palm Springs from the south, but the fault is not considered active by State maps (Jennings, 1994).

In addition, the following reference is added to the References section on page 4.6-17:

Southern California Earthquake Data Center (SCEDC), 1986 North Palm Springs Earthquake. http://www.data.scec.org/fault_index/garnet.html. Accessed March 12, 2010.

Response O2-62 The second sentence of the first paragraph under Seismic Activity on Draft EIR page 4.6-3 has been revised as shown below to clarify that fault rupture did not occur along the Banning, Mission Creek, and Garnet Hill faults in 1986.

The 1986 quake registered a magnitude of 5.6 and caused minor ground ~~rupturing~~ cracks along the Banning, Mission Creek, and Garnet Hill faults, but these cracks were due to shaking, not surface rupture.

Response O2-63 The Applicant requests that four sentences be added to the subsidence discussion presented on Draft EIR page 4.6-4. However, the comment includes no indication of why the sentences should be added, and it is not clear what would be achieved by adding the sentences. In addition, the suggested sentences appear to be based on a USGS Scientific Investigations Report and a press release; however, those reference materials were not included with the Applicant's comment letter. Because the referenced documents are not readily available for review and the suggested edits would

not add any clear value to the EIR, the CPUC has not included the requested sentences in the Final EIR.

Response O2-64 The following paragraphs have been added to the beginning of the Geology and Soils Regulatory Context discussion on Draft EIR page 4.6-5 to reflect the federal regulatory context.

Federal

Institute of Electrical and Electronics Engineers (IEEE) 693 "Recommended Practices for Seismic Design of Substations"

The Institute of Electrical and Electronics Engineers (IEEE) 693 "Recommended Practices for Seismic Design of Substations" was developed by the Substations Committee of the IEEE Power Engineering Society, and approved by the American National Standards Institute and the IEEE-SA Standards Board. This document provides seismic design recommendations for substations and equipment consisting of seismic criteria, qualification methods and levels, structural capacities, performance requirements for equipment operation, installation methods, and documentation. This recommended practice emphasizes the qualification of electrical equipment.

IEEE 693 is intended to establish standard methods of providing and validating the seismic withstand capability of electrical substation equipment. It provides detailed test and analysis methods for each type of major equipment or component found in electrical substations. This recommended practice is intended to assist the substation user or operator in providing substation equipment that will have a high probability of withstanding seismic events to predefined ground acceleration levels. It establishes standard methods of verifying seismic withstand capability, which gives the substation designer the ability to select equipment from various manufacturers, knowing that the seismic withstand rating of each manufacturer's equipment is an equivalent measure. Although most damaging seismic activity occurs in limited areas, many additional areas could experience an earthquake with forces capable of causing great damage. This recommended practice should be used in all areas that may experience earthquakes.

International Building Code

Published by the International Code-Council (ICC), the scope of this code covers major aspects of construction and design of structures and buildings, the 2006 International Building Code (IBC) replaced the 1997 Uniform Building Code and contains provisions for structural engineering design. Published by the International Conference of

Building Officials, the IBC addresses the design and installation of structures and building systems through requirements that emphasize performance. The IBC includes codes governing structural as well as fire- and life-safety provisions covering seismic, wind, accessibility, egress, occupancy, and roofs.

Response O2-65 The following *California Building Code* paragraphs replace the *Design Standards* paragraph of the Geology and Soils Regulatory Context discussion on Draft EIR page 4.6-5 to provide more background on the California Building Code.

California Building Code

The California Building Code (CBC) has been codified in the California Code of Regulations (CCR) as Title 24, Part 2. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or they are not enforceable. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The 2007 CBC is based on the 2006 IBC published by the International Code Conference. In addition, the CBC contains necessary California amendments which are based on the American Society of Civil Engineers (ASCE) Minimum Design Standards 7-05. ASCE 7-05 provides requirements for general structural design and includes means for determining earthquake loads as well as other loads (flood, snow, wind, etc.) for inclusion into building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California.

The earthquake design requirements take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at the site and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). Design specifications are then determined according to the SDC.

~~**Design Standards**~~

~~Building codes provide specific standards for design and construction of buildings and structures. On January 1, 2008, California officially adopted the 2007 California Building Code (CBC). The purpose of the CBC is to provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use, occupancy, location, and maintenance of all buildings and structures within its jurisdiction. The CBC provides criteria for defining expansive soils.~~

Response O2-66 Please see Response O2-65, above.

Response O2-67 As indicated in the first paragraph on Draft EIR page 4.6-2, the Garnet Hill fault is not mapped as offsetting Holocene-age materials and, therefore, does not display evidence of being active. Geomorphic evidence of the Garnet Hill fault may not be available; however, the fault is mapped as a buried fault based on a gravity anomaly survey of the Coachella Valley by a major oil company.

Although the CPUC agrees with this comment; we do not concur with the suggested revisions. However, to clarify that fault fracture and/or rupture did not occur along the Garnet Hill fault in 1986, the following revisions have been made to the Impact 4.6-1 discussion on Draft EIR page 4.6-10. Please also refer to Response O2-62 for similar revisions that have been made to the Geology and Soils setting discussion.

> There are no active earthquake faults that are recognized or zoned by the State of California in the immediate vicinity of the Proposed Project alignments and sites. The only fault that would intersect any of the Proposed Project components is the Garnet Hill fault, which is mapped as buried with a location that is postulated across the proposed Farrell-Garnet alignment. Whereas seismic activity is not limited to active faults, ground rupture is typically associated with active faults. However, ground ~~fractures~~ <u>cracks</u> associated with the 1986 North Palm Springs earthquake were reported along the trace of the Garnet Hill fault, but the fractures were a result of ground shaking rather than fault rupture…

Response O2-68 The Impact 4.6-3 discussion on Draft EIR page 4.6-11 has been revised as indicated below to clarify that liquefaction is not likely to occur in the Proposed Project area.

> In order for liquefaction to occur, there needs to be relatively shallow groundwater conditions, generally at depths of less than 50 feet below the ground surface. Shallow groundwater conditions do not exist in the

project area and the Proposed Project would not cause the groundwater table to rise. ~~Regardless, the potential for liquefaction or other phenomena resulting in dynamic ground settlement, if even present, can be easily reduced with adequate geotechnical and foundation engineering. Therefore, with the implementation of standard engineering practices, any potential impacts associated with liquefaction, if discovered during geotechnical investigations that would be conducted for the Proposed Project, would be reduced to less than significant levels.~~ The potential impact related to seismic-related ground failure, including liquefaction, would be less than significant.

Response O2-69 It is assumed that the comment is in reference to Applicant Proposed Measure (APM) HAZ-2 (i.e., there is no Mitigation Measure HAZ-2). APM HAZ-2 is identified in Section 8 in Table 8-1 at the top of Draft EIR page 8-30.

Response O2-70 Mitigation Measure 4.8-4b identified on Draft EIR page 4.8-21 has been revised as indicated below to offer more flexibility in implementation by requiring general restoration of the disturbed areas. The same revision has been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> **Mitigation Measure 4.8-4b:** ~~Regarding the engineered erosion control and drainage plan developed as part of the site grading plan (APM HYDRO-2A), SCE shall conduct a topographic and gradient survey of the Whitewater River Wash both upstream and downstream of the proposed pole(s) replacement location within the wash. Post construction topography and gradient of the Whitewater River Wash shall be contoured~~ SCE shall restore all areas on the Whitewater Wash disturbed during construction of the Proposed Project to match the existing conditions, to ensure that the drainage pattern is not altered in a manner that would cause on- or off-site erosion or sedimentation.

The Monitoring/Reporting Requirements and Timing entries for Mitigation Measure 4.8-4b in Draft EIR Table 8-1, *Mitigation Monitoring, Reporting and Compliance Program for the Devers-Mirage 115 kV Subtransmission System Split Project*, have been revised as follows to reflect the changes in the measure indicated above.

Monitoring/Reporting Requirements	Timing
~~SCE to submit results of topographic and gradient survey to CPUC for review. CPUC mitigation monitor to inspect compliance.~~ CPUC mitigation monitor to monitor compliance.	~~Survey results to be submitted prior to construction activities within the Whitewater River Wash.~~ Following construction activities within the Whitewater River Wash. Inspection to be performed following completion of grading activities within the wash.

Response O2-71 Mitigation Measure 4.11-2 identified on Draft EIR page 4.11-18 has been revised as indicated below to remove the Riverside County submittal and approval requirements. The same revisions have been incorporated in the *Mitigation Monitoring, Reporting, and Compliance Program* (see Appendix E).

> **Mitigation Measure 4.11-2: Mirage Substation.** SCE shall ensure that noise levels associated with the Mirage Substation do not exceed the Riverside County noise standards for stationary sources. Noise control techniques may include, but not be limited to: locating the new transformer with as much setback from the existing residential properties as possible, use of noise walls or equivalent sound attenuation devices, and the use of a transformer with special noise control specifications designed in a way to specifically achieve acceptable regulatory noise standards.
>
> Prior to the installation of the new transformer, SCE shall submit to the CPUC ~~and the County of Riverside~~, for review and approval, a plan that describes the specific measures that will be taken in order to comply with the County's stationary noise standards. Once the proposed transformer is operational, SCE shall retain an acoustical engineer to perform noise measurements in the vicinity of the residences west of Mirage Substation to verify that transformer noise levels comply with the County standards. Documentation of compliance shall be submitted to the CPUC ~~and Riverside County~~. In the event the transformer noise levels violate the standards, additional noise control techniques shall be initiated to correct the violation.

The Mitigation/Reporting Requirements entry for Mitigation Measure 4.11-2 in Draft EIR Table 8-1, *Mitigation Monitoring, Reporting and Compliance Program for the Devers-Mirage 115 kV Subtransmission System Split Project*, has been revised as follows to reflect the changes in the measure indicated above.

Monitoring/Reporting Requirements
SCE to submit plan for compliance to ~~Riverside County and~~ CPUC for review and approval.
SCE to retain an acoustical engineer, and submit documentation of compliance to the CPUC ~~and Riverside County~~.

Response O2-72 The Applicant requests that Mitigation Measure 4.11-2 be revised to remove references to certain noise control techniques that may be used to ensure that noise levels at Mirage Substation do not exceed the Riverside County noise

standards for stationary sources. The CPUC sees no value in eliminating discussion of the noise control techniques that may be used at Mirage Substation. Note that the measure does not explicitly require implementation of the specific noise control techniques identified in the measure, but rather offers the techniques as examples of how noise control can be achieved.

The Applicant also suggests that the measure should be revised to indicate that a transformer would be used with sound levels as specified in *SCE Specification A5-2009: Large Three-Phase Transformers and Autotransformers with OLTC for a normal system voltage of 220/230 kV*. However, SCE did not indicate what those sound levels would be and it did not provide the referenced specification document with its comments. Without the benefit of knowing what the sound levels would be as specified in the SCE Specification A5-2009 document, the cannot include this suggestion as a revision to Mitigation Measure 4.11-2.

Response O2-73 The Applicant requests that Mitigation Measure 4.11-2 be revised to eliminate the requirement that an acoustical engineer perform noise measurements in the vicinity of the residences west of Mirage Substation once the proposed transformer is operational to verify that transformer noise levels comply with the County stationary source standards. However, the noise measurements of the operating proposed transformer are needed to ensure that the County's stationary noise source standards are not exceeded. The suggested revisions have not been incorporated into the measure. Please refer to Response O2-71 for revisions that have been made to Mitigation Measure 4.11-2.

Response O2-74 The following edit was made to the first sentence of the last paragraph on Draft EIR page 4.12-5 to reflect a likely change in the construction schedule.

> Construction activities in the project area are expected to last approximately 12 months, <u>within the 2010-2012 time frame.</u> ~~beginning in 2010 and concluding in mid-2011.~~

Response O2-75 The Caltrans traffic data presented in Draft EIR Section 4.15 are clearly described as annual average daily traffic levels. To clarify that the local roadway traffic data are average daily traffic levels, the following sentence has been added to the end of second paragraph on Draft EIR page 4.15-2.

> Below are summary descriptions of the roadways that would be affected by the Proposed Project components, and/or the alternatives in the Farrell-Garnet and Mirage-Santa Rosa study areas. <u>All traffic data presented for the local roadways are average daily traffic levels.</u>

Response O2-76 The last paragraph on Draft EIR page 4.15-2 has been revised as follows to correctly indicate that Garnet Avenue parallels the south side of I-10.

> **Garnet Avenue.** The proposed Farrell-Garnet subtransmission line alignment parallels Garnet Avenue from the Garnet Substation to the road's eastern extent, where it dead ends at a road block. Garnet Avenue is a two lane road that parallels the south side of ~~I-5~~ I-10 and has no lane stripes and has low traffic levels.

Response O2-77 The County of Riverside's 2009 Traffic Count Database (available online at http://www.rctlma.org/trans/documents/traffic_count_book.pdf) does not include up to date traffic counts for Indian Canyon Drive. The most recent counts presented in the database for Indian Canyon Drive are for the year 2007. In addition, the County of Riverside's 2009 Traffic Count Database does not identify an ADT level of 22,307 for any segment/year for Indian Canyon Drive. The Coachella Valley Association of Governments traffic data presented in the Draft EIR for Indian Canyon Drive is for the year 2009. Therefore, the Draft EIR includes the most up to date traffic data available for Indian Canyon Drive and changes to the traffic level discussion are not necessary.

Response O2-78 The referenced sentence in the first paragraph of Draft EIR Appendix B, on page 1, has been revised as follows to correctly indicate the units of milliGauss.

> Units of measure are Gauss (G) or milliGauss (mG, ~~111000~~ 1/1000 of a Gauss).

Response O2-79 The typographic error on the second page of Draft EIR Appendix B described by the Applicant (use of the word "field" instead of "filed") does not appear in the document so no correction can be made. The Applicant's other suggested clarification for the top of page 2 in Appendix B Section 1 has been included as follows:

> Its recommendations were filed with the Commission in March of 1992, and became the basis for the CPUC's EMF Policy established in D.93-11-013.

Response O2-80 The second paragraph on the second page of Draft EIR Appendix B refers to the findings related to the Commission's updates to the policies and procedures related to electric and magnetic fields. Those findings are clarified as follows:

> **Findings** – Based on the work of the Consensus Group, written testimony, and evidentiary hearings, the CPUC issued ~~its~~ decisions D.93-11-013 and ~~(~~D.06-01-042~~)~~ to address . . .

Response O2-81 The referenced sentence in the last paragraph of Draft EIR Appendix B, on page 4, has been revised as follows to indicate the correct letter for the Draft EIR electric and magnetic fields appendix.

> Specific measures to be implemented are described in the attached Field Management Plan for the Proposed Project (Appendix ~~D~~ B – Section 2) and alternatives (Appendix ~~D~~ B – Section 3).

Response O2-82 The third paragraph under 5.2, *Evaluation of Project Alternatives*, on page 5-2 is clarified as follows:

> In addition to significant unmitigable impacts described above, there are several differentiating impacts that with mitigation would be less than significant. It should be noted that there are two groups of alternative routes: (1) Farrell-Garnet, which includes the Proposed Project and Alternatives 2, 3, 6, and 7 ~~are compared to each other and to the Farrell-Garnet subtransmission line portion of~~, and (2) Mirage-Santa Rosa, which includes the Proposed Project~~,~~ and Alternative 5 ~~is compared to the Mirage-Santa Rosa subtransmission line portion of the Proposed Project~~. Table 5-2 provides a comparison of potential impacts by alternative for each resource category.

Response O2-83 A typographical error on page 5-4 in the Proposed Project column of Table 5-2 for Aesthetics is corrected as follows:

> Impacts determined to be Class II and Class III. The Farrell-Garnet line would include ~~1.5~~5.8 miles of overhead line and the Mirage-Santa Rosa line would include ~~5.8~~1.5 miles of overhead line.

CHAPTER 5
Revisions to the Draft EIR

5.1 Introduction

Pursuant to CEQA Guidelines Section 15132, this section presents the changes that were made to the Draft EIR to clarify or amplify its text in response to received comments. Such changes are insignificant as the term is used in CEQA Guidelines Section 15088.5(b), in that the changes merely clarify or amplify or make insignificant modifications. The changes are grouped by Draft EIR chapters and are then shown by page number in the Draft EIR and identified as to the location of the change in the body of the text or table.

Appendix E contains the Mitigation Monitoring, Reporting, and Compliance Program (MMRCP) for the Proposed Project, the Environmentally Superior Alternative. Consequently, clarification to mitigation measures that would affect the Proposed Project, in addition to being listed here, are included in the MMRCP in Appendix E.

Where changes are shown inserted in the existing Draft EIR text, revised or new language is underlined, deleted language is indicated by ~~strikethrough text~~, and the original text is shown without underline or strikethrough text.

5.2 Text Changes

Page ***Identification* / Text Change**

Executive Summary

ES-1 *The following revisions have been made to the third paragraph under Section ES.1, Introduction/Background.*

> This Draft EIR has been prepared pursuant to the California Environmental Quality Act (CEQA) and considers the potential environmental impacts from the Proposed Project and identifies and evaluates a range of alternatives. Based on this evaluation and the documentation which follows, this Draft EIR identifies ~~Alternative 5~~ the Proposed Project as the Environmentally Superior Alternative for both the Mirage-Santa Rosa study area and ~~Alternative 3 as the Environmentally Superior Alternative~~ for the Farrell-Garnet study area.

ES-1 *The first sentence under Section ES.1.1, Proposed Project, has been clarified as follows.*

The Proposed Project consists of a number of distinct project components that together make up the entire Proposed Project, including two new 115 kV subtransmission lines, ~~three~~ seven 115 kV subtransmission line reconfigurations, a 220 kV transmission line loop-in, substation modifications, . . .

ES-2 *Figure ES-1 has been revised as shown on the following page.*

ES-4 *The second bullet under Mirage Substation in Table ES-1 has been revised as follows.*

- Install five new 220 kV circuit breakers and ~~five~~ three new 115 kV circuit breakers

ES-4 *The fifth bullet under Mirage Substation in Table ES-1 has been revised as follows:*

- Install the new Mirage-Santa Rosa 115 kV subtransmission line and relocate the existing Mirage-Concho and Mirage-Tamarisk 115 kV subtransmission lines.

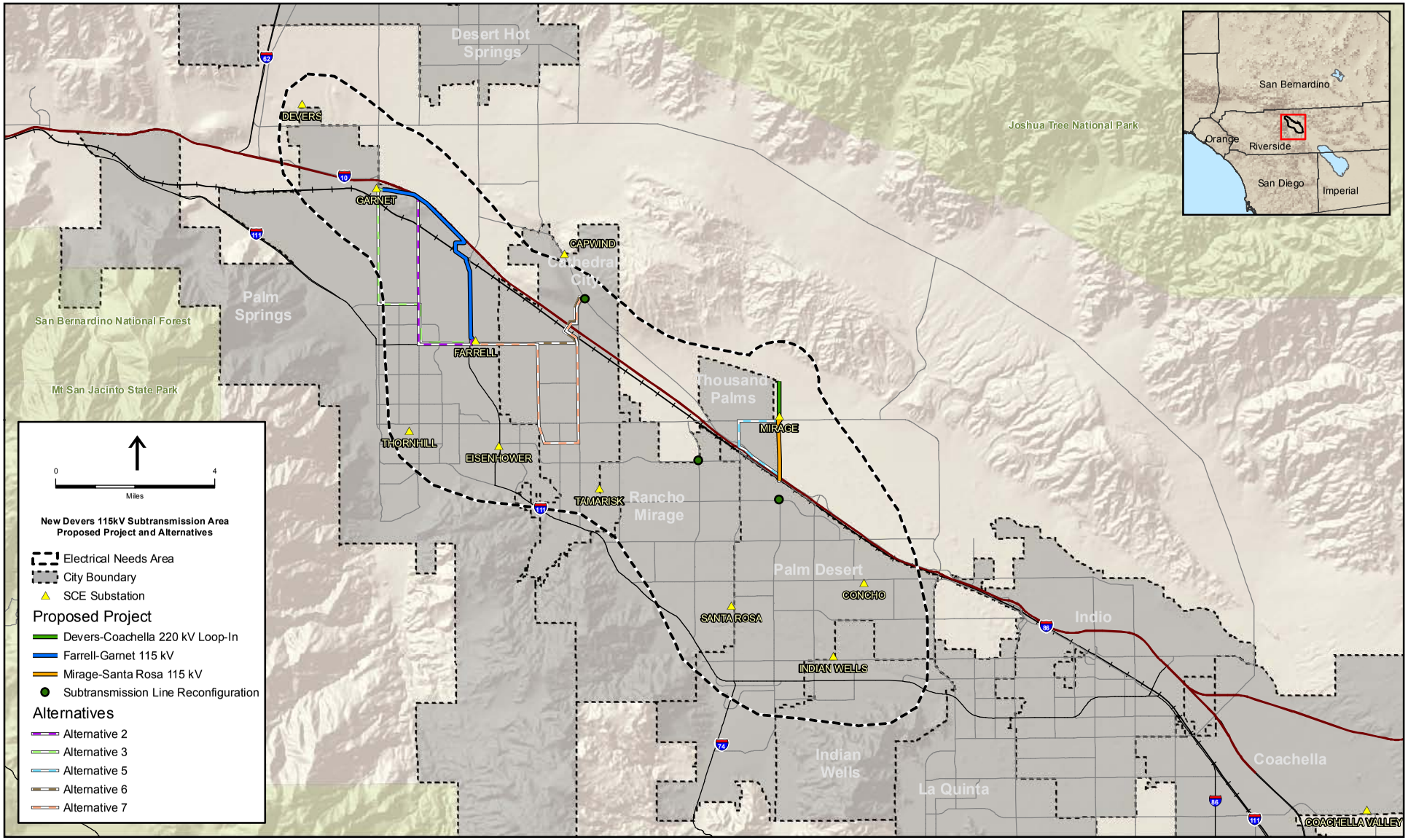
ES-5 *The first bullet under Santa Rosa Substation in Table ES-1 has been replaced with the following two bullets for clarity.*

- ~~Connect the Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line and the new Mirage-Santa Rosa 115 kV subtransmission line~~
- Convert the existing Santa Rosa-Garnet 115 kV subtransmission line to the new Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line
- Convert the existing Santa Rosa-Tamarisk 115 kV subtransmission line to the new Mirage-Santa Rosa 115kV subtransmission line

ES-5 *The first bullet under Thornhill Substation in Table ES-1 has been revised as follows.*

- ~~Install the new Devers-Eisenhower-Thornhill 115 kV subtransmission line~~ Convert the existing Thornhill-Tamarisk 115kV subtransmission line to the new Devers-Eisenhower-Thornhill 115kV subtransmission line

ES-9 *Figure ES-2 has been revised as shown on the page that follows the next page.*

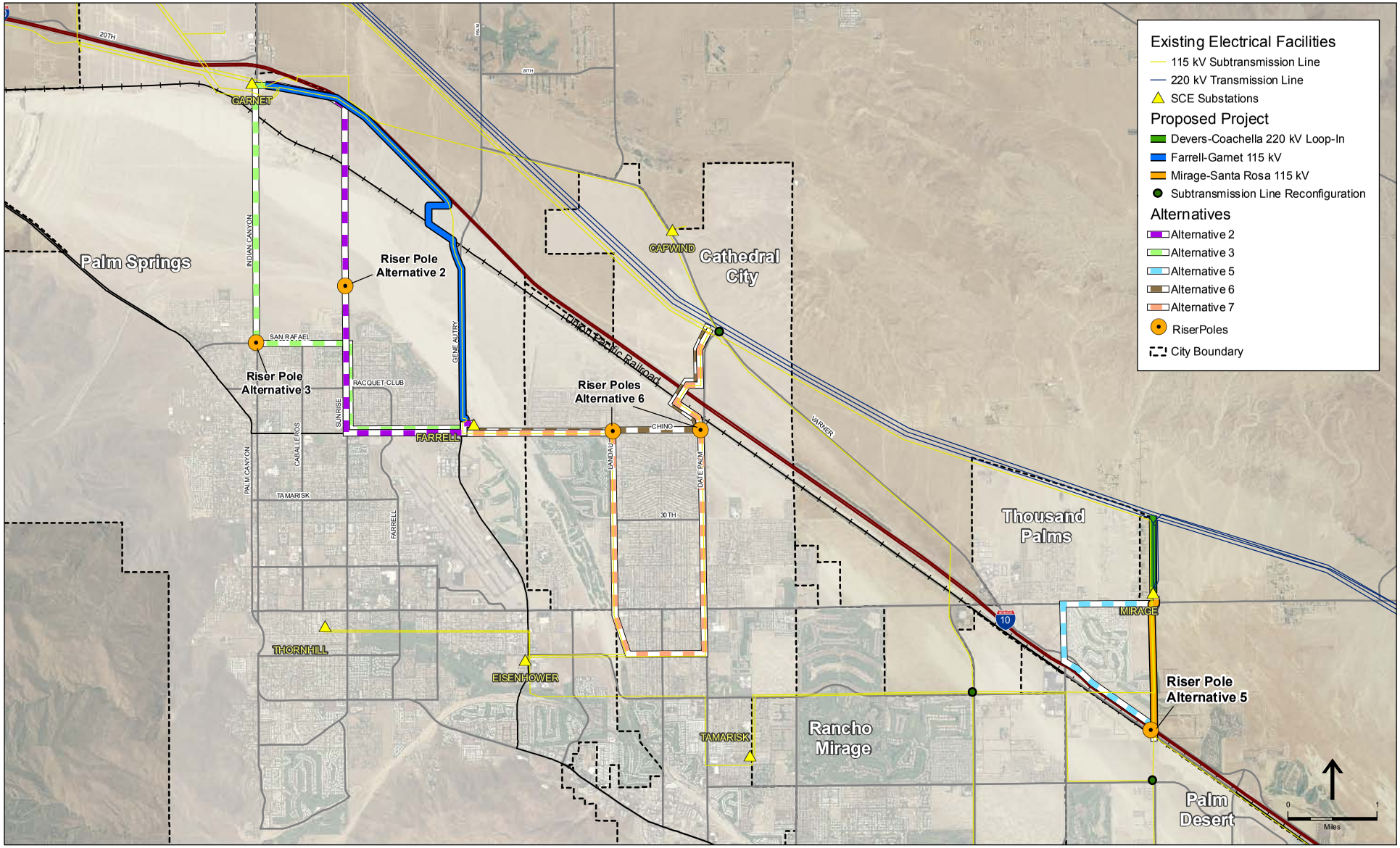


SOURCE: SCE, 2008

Devers-Mirage 115 kV Subtransmission System Split Project . 207059

Figure ES-1

Proposed Project and Alternatives Electrical Needs Area



SOURCE: SCE, 2008

Devers-Mirage 115 kV Subtransmission System Split Project . 207059

Figure ES-2

Alternatives Overview

ES-20, -21 *The paragraphs under Section ES.4.3, Environmentally Superior Alternative, is revised as follows.*

Table ES-3 summarizes the environmental impact conclusions of the Proposed Project and alternatives. Implementation of the Proposed Project and all five alternatives would result in significant and unmitigable (Class I) impacts on air quality during construction~~.~~, ~~A~~a~~l~~though impacts to air quality would be of varying degrees (i.e., alternatives with an underground component would be slightly more adverse than the Proposed Project due to emissions during trenching activities~~), the impacts would be short term and temporary in nature; therefore, impacts of slightly varying degree between alternatives is not material enough to determine a preferred alternative from an air quality perspective~~.

~~However, impacts to aesthetics, biological resources, cultural resources, and traffic and transportation, while all mitigable to less than significant, do vary enough to determine a preferred alternative from the perspective of these issue areas. Consequently, the selection of an Environmentally Superior Alternative is based on differences in intensity and type of impacts that would be less than significant with mitigation. Based on these differences the identified Environmentally Superior Alternative for the Farrell-Garnett study area is Alternative 3 and the identified Environmentally Superior Alternative for the Mirage-Santa Rosa study area is Alternative 5.~~

To determine the Environmentally Superior Alternative, resource weighting factors were assigned and a ranking matrix was used to calculate a weighted score for the Proposed Project and each alternative. The Proposed Project subtransmission lines would result in the least severe air quality, cultural resources, noise, transportation and traffic, hazards and hazardous materials, public services, and utilities and service systems impacts compared to the alternatives, and in the Farrell-Garnet study area the Proposed Project would result in the second least severe impacts related to aesthetics. However, the Proposed Project would result in the most severe impacts related to biological resources in both study areas and would result in the most severe impacts related to aesthetics in the Mirage-Santa Rosa study area. Because the Proposed Project subtransmission lines would result in less severe significant and unavoidable air quality construction impacts than the alternatives, with the exception of biological resources and aesthetics, and would result in less severe impacts compared to the alternatives for all of the other resource areas where a preference is identified, the Proposed Project subtransmission lines (i.e., the proposed Farrell-Garnet Subtransmission line and the Mirage-Santa Rosa Subtransmission lines) are selected as the Environmentally Superior Alternatives for both the Farrell-Garnett and Mirage-Santa Rosa study areas.

ES-21 *The paragraph* under Section ES.4.4, *Environmentally Superior Alternative vs. No Project Alternative,* is revised as follows.

The Environmentally Superior Alternatives ~~(Alternatives 3 and 5)~~ as defined above would reduce long-term aesthetics and biological resources impacts and would have minimal long-term impacts on residences or other sensitive land uses. Under the No Project Alternative scenario, SCE may be required to construct new subtransmission and transmission lines and/or additional power generation in or near the study area to supply power to the Electrical Needs Area. It would be overly speculative for this EIR to assume where the new subtransmission and transmission facilities and/or power generation facilities would be sited; however, it is reasonable to assume that at a minimum, environmental impacts associated with the No Project Alternative scenario would not be less than those from the Environmentally Superior Alternatives. Therefore, the Environmentally Superior Alternatives are preferred over the No Project Alternative.

ES-22 *Table ES-4 has been revised as follows.*

TABLE ES-4
DEVERS-MIRAGE 115KV SUBTRANSMISSION SYSTEM SPLIT PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Issue Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Aesthetics	Proposed Mirage-Santa Rosa line would have more of an impact than Alternative 5.	Least impact for the Farrell-Garnet study area.	~~Least impact for the Farrell-Garnet study area.~~ Most impact for the Farrell-Garnet study area.	Less of an impact than the proposed Mirage-Santa Rosa line.		~~Most impact for the Farrell-Garnet study area.~~
Agriculture Resources	No Preference	No Preference	No Preference	No Preference	No Preference	No Preference
Air Quality	~~No Preference~~ Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.	~~No Preference~~ Most impacts for Farrell-Garnet study area.	~~No Preference~~	~~No Preference~~ More impacts than the proposed Mirage-Santa Rosa line.	~~No Preference~~	~~No Preference~~
Biological Resources	Most impacts for the Farrell-Garnet and Mirage-Santa Rosa study areas.		~~Least impacts for the Farrell-Garnet study area.~~	Less impacts than the proposed Mirage-Santa Rosa line.		Least impacts for the Farrell-Garnet study area.

Issue Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Cultural Resources	~~Most~~Least impacts for the Farrell-Garnet and Mirage-Santa Rosa study areas.	Most impacts for Farrell-Garnet study area.		~~Less impacts than the proposed Mirage-Santa Rosa line.~~ More impacts than the proposed Mirage-Santa Rosa line.		~~Least impacts on cultural resources for the Farrell-Garnet study area.~~
Geology and Soils	No Preference	No Preference	No Preference	No Preference	No Preference	No Preference
Hazards / Hazardous Materials	~~No Preference~~ Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.	~~No Preference~~ Most impacts for Farrell-Garnet study area.	~~No Preference~~	~~No Preference~~ More impacts than the proposed Mirage-Santa Rosa line.	~~No Preference~~	~~No Preference~~
Hydrology and Water Quality	No Preference	No Preference	No Preference	No Preference	No Preference	No Preference
Land Use, Planning and Policies	No Preference	No Preference	No Preference	No Preference	No Preference	No Preference
Minerals	No Preference	No Preference	No Preference	No Preference	No Preference	No Preference
Noise	~~No Preference~~ Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.	~~No Preference~~	~~No Preference~~ Most impacts for Farrell-Garnet study area.	~~No Preference~~ More impacts than the proposed Mirage-Santa Rosa line.	~~No Preference~~	~~No Preference~~
Population and Housing	No Preference	No Preference	No Preference	No Preference	No Preference	No Preference
Public Services	~~No Preference~~ Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.	~~No Preference~~	~~No Preference~~ Most impacts for Farrell-Garnet study area.	~~No Preference~~ More impacts than the proposed Mirage-Santa Rosa line.	~~No Preference~~	~~No Preference~~
Recreation	No Preference	No Preference	No Preference	No Preference	No Preference	No Preference
Transportation and Traffic	Least impacts for the Farrell-Garnet and Mirage-Santa Rosa study areas.		Most impacts for the Farrell-Garnet study area.	More impacts ~~to~~ than the proposed Mirage-Santa Rosa line.		

Issue Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Utilities and Service Systems	~~No Preference~~ Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.	~~No Preference~~ Most impacts for Farrell-Garnet study area.	~~No Preference~~	~~No Preference~~ More impacts than the proposed Mirage-Santa Rosa line.	~~No Preference~~	~~No Preference~~

ES-24 *Impact 4.5-1 in the Executive Summary Table ES-5 has been removed.*

Cultural Resources			
~~**4.5-1:** Impacts to historic site 33-8408, Varner Road~~	~~Class III~~	~~None required~~	~~Less than Significant~~

Chapter 1. Introduction

1-2 *The following sentence in the last paragraph in Section 1.2, Project Objectives, Purpose and Need, is revised as follows.*

Splitting the existing 115 kV system is necessary to relieve thermal overload conditions on the ~~existing~~ Mirage-Concho ~~leg of the Devers-Capwind-Concho-Mirage~~ 115 kV ~~subtransmission line~~ and ~~the~~ Mirage-Tamarisk 115 kV subtransmission line<u>s</u>.

Chapter 2. Project Description

2-13 *The first bullet is clarified as follows.*

- Split the existing Garnet-Santa Rosa 115 kV subtransmission line at the intersection of Bob Hope Drive and Dinah Shore Drive by removing the span of wire that connects the southwest and northeast corner poles <u>and transfer it to the southeast corner pole</u> (see Figure 2-5, *Existing and Proposed 115 kV Line Configurations at Bob Hope and Dinah Shore Drives*).

2-13 *The second bullet is clarified as follows.*

- Split the Santa Rosa-Tamarisk at the same intersection by dead-ending and grounding the Santa Rosa leg at the ~~northwest~~ <u>southeast</u> corner pole. The portion of the Santa Rosa-Tamarisk line between Bob Hope Drive east to Portola Avenue would become idle.

2-13 *The third bullet is clarified as follows.*

- Connect the open Tamarisk leg of the existing Santa Rosa-Tamarisk 115 kV subtransmission line to the open Garnet leg of the existing Garnet-Santa Rosa 115 kV subtransmission line at the ~~northwest~~ southeast corner pole of Bob Hope Drive and Dinah Shore Drive.

2-18 *The first bullet is clarified as follows.*

- Install a span of conductor between the existing north segment of the Garnet-Santa Rosa 115 kV subtransmission line and the existing west segment of the Santa Rosa-Tamarisk 115 kV subtransmission line at the ~~northwest~~ southeast corner of Bob Hope Drive and Dinah Shore Drive.

2-22 *The third full paragraph is revised as follows.*

The TSPs would be installed on top of cylindrical concrete footings approximately six to eight feet in diameter and ~~approximately 20 to 25~~ at least 22 feet deep. After holes for the footings have been bored, a steel rebar cage would be inserted into the hole, and then concrete would be poured into the hole to a level up to two feet above the ground surface. After the concrete has cured, the TSP would be bolted onto the footing. Excess bore spoils would be distributed at each pole site, used as backfill to fill holes left after removal of nearby wood poles, or removed from the pole sites.

2-22 *The fourth full paragraph is replaced with the following paragraphs as follows.*

~~Both LWS poles and TSPs consist of separate base and top sections for ease of construction. Steel pole installation would begin by transporting the poles from the staging area and laying the individual sections on the ground at each new pole location. While on the ground, the top section would be pre-configured with the necessary insulators and wire-stringing hardware. A line truck with a boom on it for LWS poles, or a crane for TSPs would be used to position each pole base section into previously augured holes for the LWS poles or on top of previously prepared foundations for the TSPs. When the base section is secured, the top section would be placed above the base section. The two sections may be spot-welded together for additional stability.~~

While on the ground, the top and bottom sections of the LWS poles would be pulled together and preconfigured with the necessary insulators and wire stringing hardware. For LWS poles, a line truck with a boom on it would be used to position each pole into previously augured holes.

The TSPs would require a crane to set the pole bases on top of previously installed concrete foundations. Once secured, the top, and if necessary middle,

sections of the TSP would then be set on the base of the TSP. For both structures, all sections may be spot welded together for added stability.

2-23 *The first paragraph under Conductor Pulling is replaced with the following paragraph.*

~~Conductors would be installed on 115 kV polymer insulator assemblies attached to each crossarm in a horizontal configuration or suspension assemblies consisting of single polymer insulators attached to each crossarm in a vertical configuration. Overhead ground wires would be installed on the top of the steel poles.~~ Conductors would be attached to 115 kV polymer post style insulators, that would be attached to each pole head for LWS poles, and suspended, or dead ended, to steel crossarms mounted on TSPs. Depending on location, the insulator configurations may be mounted vertically, or in a triangular pattern. With the exception of certain locations near substations, the overhead ground wire would be installed in accordance with G.O. 95 Table II. Distribution lines transferred to the new steel poles would typically be installed on standard wood crossarms with polymer insulators.

2-23 *The second paragraph under Conductor Pulling is revised as follows.*

Conductor pulling includes all activities associated with the installation of conductors onto the LWS and wood poles and TSPs. These activities include installing three 115 kV 954 SAC conductors, one 221 kcmil ACSR ground conductor, ~~ground wire, vibration dampeners, weights, and~~ post, suspension, ~~and~~ or dead-end hardware assemblies for the entire length of the proposed subtransmission lines.

2-41 *The first paragraph is revised as follows.*

Devers Substation is a staffed, 500/220/115 kV substation located in the unincorporated area of Riverside County, north of the City of Palm Springs. The proposed improvements at Devers Substation include the conversion of Devers-Mirage 220 kV transmission line to Devers-Mirage No. 1 220 kV transmission line, reconfiguration of the Coachella Valley-Devers 220 kV transmission line to the Devers-Mirage No. 2 220 kV transmission line, relay upgrades, replacement of two 115 kV circuit breakers in existing Position No. 7 for the new Devers-Eisenhower-Thornhill 115 kV subtransmission line and replacement of two 115 kV circuit breakers in existing Position No. 4 for the new Mirage-Capwind-Devers-Tamarisk 115 kV subtransmission line. Improvements at the substation would also include installation of new line-protection relays.

2-41 *The first* bullet *is revised as follows.*

- Four 115 kV, 1,200 Amp, 40 kilo~~annum~~ Amperes (kA) duty, circuit breakers

2-42 *The first paragraph under Engineering Plan is revised as follows.*

Mirage Substation is an unstaffed, 220/115 kV substation located in unincorporated Riverside County in the general vicinity of the community of Thousand Palms. The proposed improvements at Mirage Substation include the installation of one 280 MVA, 220/115 kV transformer bank, one new 220 kV bank position, one new 115 kV bank position, and one new 220 kV breaker-and-a-half configuration position ~~for two new 220 kV line positions,~~ and the relocation of the existing Mirage-Ramon 220 kV transmission line, the existing Julian Hinds-Mirage 220 kV transmission line, and the existing Devers-Mirage 220 kV transmission line. Other work at the substation would include looping of the Devers-Coachella Valley 220 kV transmission line into the Mirage 220 kV switchrack, installation of the new Mirage-Santa Rosa 115 kV subtransmission line, relocation of existing Mirage-Concho 115 kV subtransmission line, renaming the existing Mirage-Capwind- Devers 115 kV subtransmission line to Mirage-Capwind-Tamarisk-Devers 115 kV subtransmission line, renaming the Mirage-Concho 115 kV subtransmission line to Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line, and installation of new line protection relays.

2-42 *The bullets under Major Equipment are revised as follows.*

Major Equipment

- One 280 MVA 220/115 kV transformer bank;
- Five 220 kV, 3,000 amp, 50 kA duty, circuit breakers;
- Ten 220 kV, 3,000 amp, center-side-break disconnect switches;
- ~~Fifteen~~ Eighteen 220 kV station post insulators;
- ~~Six 220 kV metering potential transformers~~ Three 220 kV coupling capacitor voltage transformers;
- Three 220 kV metering units;
- Two 115 kV, 3,000 amp, 40 kA duty circuit breakers;
- ~~Three~~ One 115 kV, 2,000 amp, 40 kA duty circuit breakers;
- Four 115 kV, 3,000 amp, center-side-break disconnect switches;
- ~~Six~~ Two 115 kV, 2,000 amp, center-side-break disconnect switches;
- ~~Nine~~ Six 115 kV potential transformers; and
- ~~Twenty-seven~~ Twelve 115 kV post insulators.

2-42, -43 *The bullets under Switchrack Configurations are revised as follows.*

Switchrack Configurations

- One new 220 kV transformer bank position No. 6S designed with a double-breaker configuration;
- One new 220 kV line position No. 5 designed with a breaker-and-a-half configuration for relocation of the existing Julian Hinds-Mirage 220 kV transmission line (Pos. No. 5N) and relocation of the existing Mirage-Ramon 220 kV transmission line (Pos. No. 5S);

- Renaming the Devers-Mirage 220 kV transmission line to Devers-Mirage No. 1 transmission line;
- Existing 220 kV transmission line Position No. 3 would be upgraded and remain a breaker-and-a-half configuration for the installation of the new Devers-Mirage No. 2 220 kV transmission line (Pos. No. 3N) and the installation of the new Mirage-Coachella Valley 220 kV transmission line (Pos. No. 3S);
- Existing Tamarisk 115 kV subtransmission line would be relocated to line position 1N to create the Devers-Capwind-Mirage-Tamarisk 115 kV subtransmission line;
- Vacated existing line position No. 1S would be for the new Mirage-Santa Rosa-Tamarisk 115 kV subtransmission line;
- One new 115 kV transformer bank position (No. 6N) designed with a double-breaker configuration;
- ~~One new 115 kV line position (No. 7N) designed with a double-breaker configuration; and~~
- Convert existing 115 kV line position (No. 4) from a double-breaker configuration to a breaker-and-a-half configuration for relocated Concho 115 kV line Position (No. 4S) and new Santa Rosa 115 kV line Position (No. 4N); and
- Install one 220/115 kV transformer bank.

2-58, -59 *The first paragraph under Section 2.7.2, Construction Plan, is revised as follows.*

The existing fiber optic cables would be transferred from existing poles to the new 115 kV subtransmission poles that would be installed within existing ROWs or franchise locations. The All-Dielectric Self-Supporting (ADSS) fiber optic cables would be attached to a support block beneath the end of each 10-foot wood cross-arm on each new pole as shown in Figure 2-3. Telecommunications equipment installation would occur within existing SCE substation buildings and at the Edom Hill Communications Site. IID equipment and circuit installation ~~would occur at~~ is expected to be in the IID's mechanical-electrical equipment room (MEER).

2-60 *The typographical error in Table 2-7 is corrected as follows.*

Indian Wells, Equipment/Circuit Installation			
Equipment Installation	3	~~35~~ 5	2 – Pick-Up (Gasoline)

2-62 *The last sentence in the first incomplete paragraph is corrected as follows.*

Additional information on electric and magnetic fields generated by transmission lines is presented in Appendix ~~D~~ B.

2-62 *The first complete paragraph is revised as follows.*

After several decades of study regarding potential public health risks from exposure to power line EMF, research results remains inconclusive. Several national and international panels have conducted reviews of data from multiple studies and state that there is not sufficient evidence to conclude that EMF causes cancer. Most recently the World Health Organization (WHO) International Agency for Research on Cancer (IARC) and the California Department of Health Services (DHS) both classified EMF as a *possible* carcinogen.

Chapter 3. Alternatives and Cumulative Projects

3-13 *The text in the third sentence of the first paragraph is revised as follows.*

At Sunrise Way, the line would turn north, and proceed along Sunrise Way to approximately 1,265 feet north of Four Seasons Boulevard, where the underground segment would end and the subtransmission line would transition to overhead at a riser pole . . .

Chapter 4. Environmental Analysis

4-2 *An insert has been made in Section 4.0, Introduction to Environmental Analysis, after the second full paragraph, as follows.*

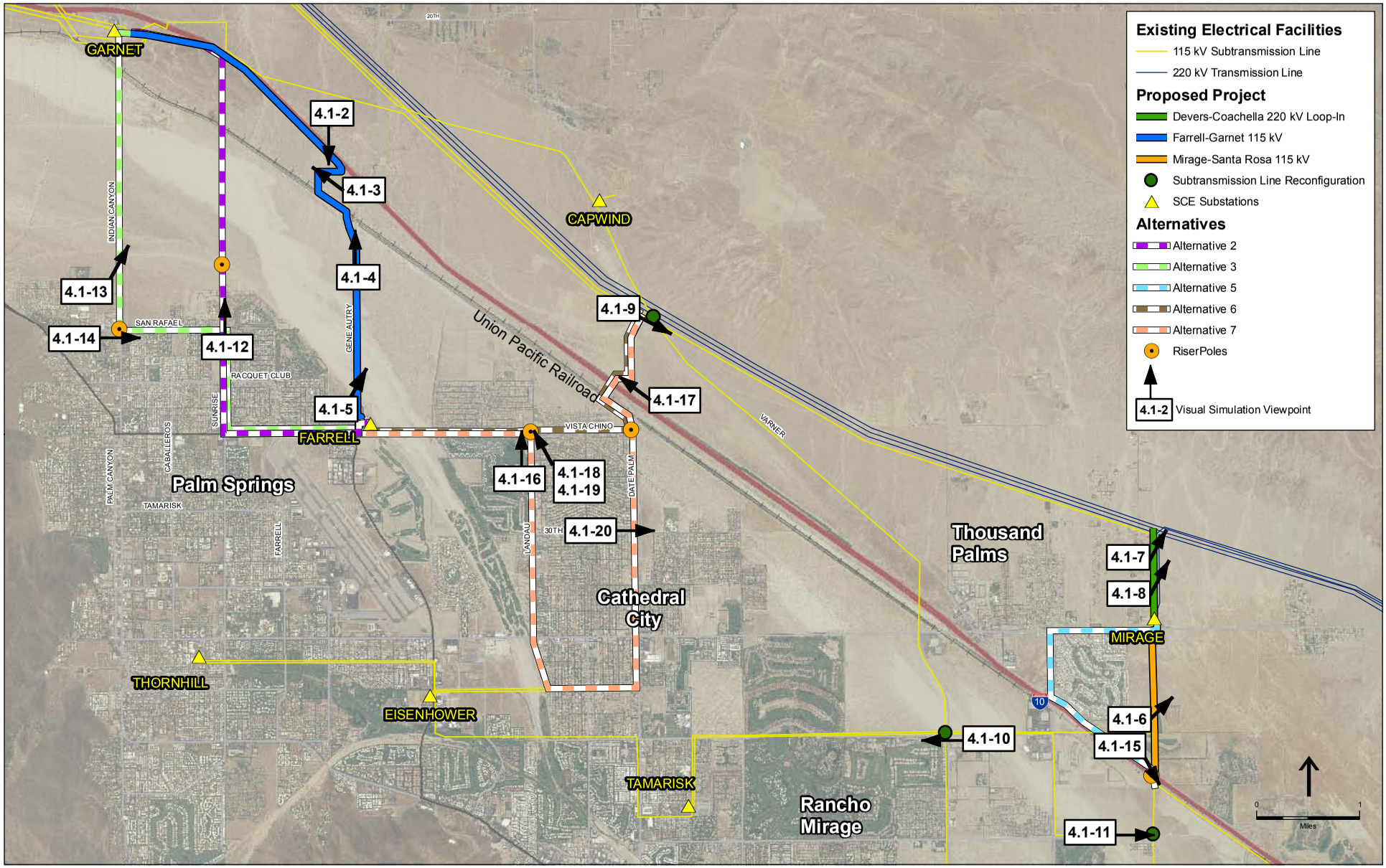
With regard to the discussion of local plans, policies, and ordinances in each of the resource sections 4.1 through 4.16, CPUC General Order 131-D clarifies that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters. In instances where the public utilities and local agencies are unable to resolve their differences, the Commission shall set a hearing no later than 30 days after the utility or local agency has notified the Commission of the inability to reach agreement on land use matters.

Section 4.1, Aesthetics

4.1-3 *The following paragraph* has been added to the Local Major Roadways discussion.

Indian Canyon Drive. Indian Canyon Drive is an existing north-south roadway into Palm Springs with access from/to the I-10. Views from this roadway include open space and the San Jacinto Mountains.

4.1-14 *Figure 4.1-1 has been updated as shown of the following page.*



SOURCE: SCE, 2008a, 2008b, and 2009.

Devers-Mirage 115 kV Subtransmission System Split Project . 207059

Figure 4.1-1

Visual Simulation Viewpoints

4.1-44 *The second sentence of Mitigation Measure 4.1-6 has been revised as follows. The same change has been incorporated in the Mitigation Monitoring, Reporting and Compliance Program (see Appendix E).*

SCE shall submit a *Construction Lighting Mitigation Plan* to the CPUC for review and approval at least ~~90~~ 30 days prior to the start of nighttime construction or the ordering of any exterior lighting fixtures or components, whichever comes first.

4.1-46 *Mitigation Measure 4.1-8 has been revised as follows. The same change has been incorporated in the Mitigation Monitoring, Reporting and Compliance Program (see Appendix E).*

Mitigation Measure 4.1-8: ~~A non-reflective or weathered finish shall be applied to all~~ All new structures and equipment installed at the Devers, Mirage, Concho, Indian Wells, Santa Rosa, Eisenhower, Farrell, Garnet, Thornhill, and Tamarisk Substations shall have non-specular (reduced glare) surface finishes, except for structures or equipment for which such finishes are not commercially available ~~to reduce potential glare effects~~.

4.1-50 *The following discussion has been added after the first full paragraph.*

Recreational viewers potentially affected by the Alternative 3 subtransmission line would include those associated with Desert Highland Park, located approximately 0.3 mile west of where the Alternative 3 subtransmission line would be located along Indian Canyon Drive and approximately 0.6 mile northwest of the where the Alternative 3 riser pole would be located. Views of the subtransmission line and riser pole would be achieved from certain locations at the east side of the park and would range from partially to fully screened, dependent on the presence of the recreational facilities and vegetation at the park. Therefore, visual sensitivity would be low, overall visual change would be low, and impacts would be less than significant requiring no mitigation (Class III). Visual impacts to recreational viewers that would be associated with Alterative 3 at the Desert Highland Park would be approximately the same as those that would be associated with the proposed Farrell-Garnet subtransmission line at Palm Springs Country Club Golf Course.

Section 4.2, Agricultural Resources

No changes have been made to Section 4.2, *Agricultural Resources.*

Section 4.3, Air Quality

No changes have been made to Section 4.3, *Air Quality*

Section 4.4, Biological Resources

4.4-47 *The last sentence in the second paragraph of Impact 4.4-1 is revised as follows.*

Although this location is predominantly composed of ruderal species, and no CV milkvetch was observed during the spring and summer 2009 surveys, there is still potential for this species to occur.

4.4-47 *The last sentence in the third paragraph of Impact 4.4-1 is revised as follows.*

Although both of these locations are currently predominantly composed of ruderal species, and no CV milkvetch was observed during the spring and summer 2009 surveys, there is still potential for the CV milkvetch to occur.

4.4-48 *The second paragraph of Mitigation Measure 4.4-1 has been clarified as shown below. The same clarification has been incorporated in the Mitigation Monitoring, Reporting, and Compliance Program (see Appendix E).*

Temporary and permanent impacts to habitat for the CV milkvetch shall be compensated for through conservation of suitable habitat for this species. The calculated replacement for habitat loss for the CV milkvetch shall be based on a ratio of 3:1 (compensation to impact) per acre for temporary impacts and 9:1 for permanent impacts, for an estimated total of 6 acres. These ratios ~~Ratios~~ reflect the limited habitat and low populations of this species across its range, and the loss of habitat available for this species in the project area, and are consistent with compensation ratios established in the CVMSHCP. Greater or lesser compensation ratios may be substituted as determined though USFWS and CDFG consultation and/or permitting, considering the quality of the habitat being affected. The replacement habitat shall be within the Whitewater Floodplain Conservation Area of the CVMSHCP. Total compensation funds shall include the costs of acquisition and long-term management, and shall be paid prior to the start of project operations. This replacement habitat shall mitigate for both direct and indirect impacts of construction and operations/management on this species, as well as the CV fringe-toed lizard (see Mitigation Measure 4.4-2, below), Palm Springs pocket mouse, Palm Springs round-tailed ground squirrel, CV giant sand-treader cricket, and Le Conte's thrasher.

4.4-50 *The first sentence of the third bullet of Mitigation Measure 4.4-2 is clarified as shown below. The same clarification has been incorporated in the Mitigation Monitoring, Reporting, and Compliance Program (see Appendix E).*

SCE and/or its construction contractors shall retain and have available, the services of a ~~CPUC authorized~~ qualified biologist who shall perform the duties of the biological monitor.

4.4-51 *The second sentence of the fifth bullet of Mitigation Measure 4.4-2 on page 4.4-51 is clarified as shown below. The same clarification has been incorporated in the Mitigation Monitoring, Reporting, and Compliance Program (see Appendix E).*

Each plant that is destroyed due to construction in the ROW along the east and west side of Gene Autry Trail roadway shall be replaced and monitored for at least ~~ten~~ five years, or other period of time approved by the USFWS, . . .

4.4-51 *The final bullet of Mitigation Measure 4.4-2 has been clarified as shown below. The same clarification has been incorporated in the Mitigation Monitoring, Reporting, and Compliance Program (see Appendix E).*

- Temporary and permanent impacts to CV fringe-toed lizard habitat shall be mitigated through conservation of suitable habitat for this species. The calculated replacement for habitat loss for this species shall be based on a ratio of 3:1 (compensation to impact) per acre for temporary impacts and 9:1 for permanent impacts, for an estimated total of 6 acres. These ratios ~~Ratios~~ reflect the limited habitat and low populations of this species across its range, and include both the loss of habitat use by the species, and the adverse effect of raptor predation caused by the new raptor perch availability at the new poles, and are consistent with compensation ratios established in the CVMSHCP. Greater or lesser compensation ratios may be substituted as determined though USFWS and CDFG consultation and/or permitting, considering the quality of the habitat being affected. The replacement habitat shall be within the Whitewater Floodplain Conservation Area of the CVMSHCP. Total compensation funds shall include the costs of acquisition and long-term management, and shall be paid prior to the start of Proposed Project operations. This replacement habitat shall mitigate for both direct and indirect impacts of construction and operations/management on this species, as well as the Palm Springs pocket mouse, Palm Springs round-tailed ground squirrel, CV giant sand-treader cricket, Le Conte's thrasher, flat-tailed horned lizard, and CV milkvetch (habitat conserved through this measure may be the same as that conserved through Mitigation Measure 4.4-1 for the CV milkvetch).

4.4-58 *The first bullet of Mitigation Measure 4.4-10 has been clarified as shown below. The same clarification has been incorporated in the Mitigation Monitoring, Reporting, and Compliance Program (see Appendix E).*

- Purchase or dedication of land to provide wetland preservation, restoration, or creation. If restoration is available and feasible, then a mitigation replacement ratio of at least 2:1 shall be used. If a wetland needs to be created, at least a 3:1 ratio shall be implemented to offset losses. Where practical and feasible, onsite mitigation shall be implemented. Greater or lesser offset ratios may be substituted through consultation and/or permitting with the appropriate wildlife agency (USFWS or CDFG).

Section 4.5, Cultural Resources

4.5-7 *The introduction to the Findings discussion is clarified as follows.*

Findings

The cultural resources records search revealed the presence of the following five previously recorded cultural resources within a 0.5-mile radius of the APE for the proposed and alternative alignments.

4.5-7 *The first sentence of the* first indented *paragraph under Findings is clarified as follows.*

Hoon wit ten ca va (Garnet Hill). This resource is located within the viewshed but outside the physical APE for the proposed overhead Farrell-Garnet 115 kV subtransmission line alignment and the Alternative 3 alignment, but is within the APE for the Alternative 2 alignment.

4.5-8 *The first sentence of the first full paragraph is clarified as follows.*

33-8408 (Varner Road). This resource is located within the viewshed but outside the physical APE for the proposed overhead reconfigured Mirage-Capwind-Devers-Tamarisk 115 kV line~~,~~ and the proposed overhead Mirage-Santa Rosa 115 kV subtransmission line alignment~~s, and Alternative 5, 6 and 7 alignments~~.

4.5-8 *The first* sentence of the last paragraph is clarified as follows.

33-9498/CA-RIV-6381H (Southern Pacific Railroad/Union Pacific Railroad line). This resource was relocated during the 2009 archaeological survey and is within the viewshed of but outside the physical APE for the proposed overhead Farrell-Garnet 115 kV alignment and the proposed overhead Mirage-Santa Rosa 115 kV alignment~~ and alternative subtransmission line alignments and was relocated during the 2009 archaeological survey~~.

4.5-9 *The first sentence of the first indented paragraph is clarified as follows.*

33-15429. This resource is known to be located adjacent to and outside of ~~within~~ the APE for the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment.

4.5-9 *The first sentence of the second indented paragraph is clarified as follows.*

33-15430. This resource is located within the viewshed but outside the physical APE for the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment.

4.5-23 *The third paragraph under checklist questions a, b) has been replaced with the following paragraphs.*

~~Historic resource 33-4808 (Varner Road), Native American cultural resource *Hoon wit ten ca va* and prehistoric archaeological sites CA-RIV-785, 33-15429, and 33-15430, could be impacted by the Proposed Project. Impacts are described in detail below.~~

Historic resource 33-4808 (Varner Road) would not be impacted by the Proposed Project. It would be spanned by the proposed overhead reconfigured Mirage-Capwind-Devers-Tamarisk 115 kV line and the proposed overhead Mirage-Santa Rosa 115 kV subtransmission line, and no ground-disturbing activity would occur within the roadway. Therefore, there would be no impacts to this resource (No Impact).

Native American cultural resource *Hoon wit ten ca va* (Garnet Hill) would not be physically impacted by the Proposed Project. The proposed Farrell-Garnet 115 kV line would be installed overhead on poles constructed along an existing dirt road north of Garnet Hill, and no ground disturbing activity would occur within the limits of this topographical feature. For the potential indirect impacts to this resource, see the Impact 4.5-2 discussion.

The proposed Mirage-Santa Rosa 115 kV line would be constructed on overhead poles west of 33-15429 and east of 33-15430, and all access would be from an existing dirt road located immediately west of the poles that currently carry the Mirage-Tamarisk and Mirage-Concho lines, which in this area would be reconfigured using the dirt access road for access. Prehistoric archaeological site 33-15429 would not be directly impacted by the Proposed Project. The resource is located east of the existing subtransmission line and adjacent to and outside of the APE for the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment. However, it is not known if there is a subsurface component to this resource, and if so, whether it might extend into the area that is within the Proposed Project's APE. Prehistoric archaeological site 33-15430 would not be impacted by the Proposed Project.

Prehistoric archaeological site CA-RIV-785 could be impacted by the Proposed Project. A portion of it is located within the APE for the proposed Mirage-Santa Rosa 115 kV line.

4.5-23 *The Impact 4.5-1 heading has been revised as follows.*

~~**Impact 4.5-1: Project construction could adversely affect historic site 33-8408, Varner Road.** ***Less than significant*** **(Class III)**~~

4.5-24 *The last sentence of the second paragraph has been revised as follows.*

~~Impacts~~ There would be no impact to Varner Road at this location ~~would be less than significant~~.

4.5-25 *The title of Impact 4.5-3has been renamed as follows.*

Impact 4.5-3: Project construction could adversely affect cultural resources CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~. *Less than Significant with Mitigation* (Class II)

4.5-26 *The second paragraph has been revised as follows.*

Construction of the proposed Mirage-Santa Rosa 115 kV subtransmission line could also impact site~~s~~ 33-15429~~ and 33-15430~~. ~~These sites~~ This site may be related to site CA-RIV-785 and may be eligible for listing in the NRHP and CRHR under Criterion D/4, ability to provide information important to prehistory. ~~Neither site, however~~ However, the site does not appear~~s~~ to be within the direct APE for the proposed alignment. ~~These sites~~ This site should be avoided to ensure that any adverse effects are minimized. Implementation of APM CUL-3 (Construction Monitoring) as well as Mitigation Measures 4.5-3a, 4.5-3b, and 4.5-3c would reduce potential impacts to less than significant.

4.5-26 *Mitigation Measures 4.5-3a and 4.5-3b have been revised as follows. The same revision has been incorporated in the Mitigation Monitoring, Reporting, and Compliance Program (see Appendix E).*

Mitigation Measure 4.5-3a: Avoid and protect archaeological resources. SCE shall narrow the construction zone to avoid potentially significant archaeological resources CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~ if feasible. The resources shall be designated as Environmentally Sensitive Areas (ESAs) to ensure avoidance. Protective fencing or other markers shall be erected around ESAs prior to any ground disturbing activities; however, such ESAs shall not be identified specifically as cultural resources, in order to protect sensitive information and to discourage unauthorized disturbance or collection of artifacts.

Mitigation Measure 4.5-3b: Preparation of treatment plan if avoidance is not feasible. If avoidance of sites CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~ is not feasible, prior to issuing any grading or excavation permits and prior to any project-related ground disturbing activities, a detailed Historic Properties Treatment Plan (HPTP) shall be prepared...

4.5-31 *The following paragraphs under the Alternative 2 impact discussion have been revised as follows.*

Similar to the proposed Farrell-Garnet 115 kV alignment, the Alternative 2 alignment could potentially impact previously recorded resource, *Hoon wit ten ca*

va (Garnet Hill). However, unlike the proposed Farrell-Garnet 115 kV alignment, *Hoon wit ten ca va* (Garnet Hill) would be directly impacted by Alternative 2 because the Alternative 2 alignment would be located on the resource. This resource appears significant to the oral histories of the Cahuilla Indian Tribe and may be considered a TCP. Construction of Alternative 2 could result in impacts to *Hoon wit ten ca va* (Garnet Hill). Potential impacts to the resource would be mitigated to a less-than-significant level through the implementation of APM CUL-1 and CUL-6 as well as Mitigation Measure 4.5-2, described above for the proposed Farrell-Garnet 115 kV subtransmission line (Class II). This impact would be more severe under Alternative 2 compared to the proposed Farrell-Garnet 115 kV alignment.

As with the proposed Farrell-Garnet 115 kV alignment, impacts associated with Alternative 2 related to undiscovered cultural resources would be less than significant with implementation of Mitigation Measures 4.5-4a, 4.5-4b and 4.5-4c (Class II). However, due to the increased ground disturbance that would occur under Alternative 2 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 2 compared to the proposed Farrell-Garnet 115 kV alignment.

Impacts to paleontological resources that would be associated with Alternative 2 would ~~be essentially~~ have the same impact class as those that would result under construction of the proposed Farrell-Garnet subtransmission line. With implementation of APMs PA-1 through PA-6, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 2 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 2 compared to the proposed Farrell-Garnet 115 kV alignment.

The potential impacts to human remains that would be associated with Alternative 2 would ~~be essentially~~ have the same impact class as those that would result during construction of the proposed Farrell-Garnet subtransmission line. Therefore, with implementation of APM CUL-2, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 2 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 2 compared to the proposed Farrell-Garnet 115 kV alignment.

4.5-32 *The following paragraphs under the Alternative 3 impact discussion have been revised.*

As with the proposed Farrell-Garnet 115 kV subtransmission line, construction impacts associated with Alternative 3 related to undiscovered cultural resources would be less than significant with implementation of Mitigation Measures 4.5-4a, 4.5-4b, and 4.5-4c (Class II). However, due to the increased ground disturbance

that would occur under Alternative 3 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 3 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

Impacts to paleontological resources that would be associated with Alternative 3 would ~~be essentially~~ have the same impact class as those that would result under construction the proposed Farrell-Garnet 115 kV subtransmission line. With implementation of APMs PA-1 through PA-6, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 3 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 3 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

The potential impact to human remains that would be associated with construction of Alternative 3 would ~~be essentially~~ have the same impact class as those that would result during construction of the proposed Farrell-Garnet 115 kV subtransmission line. Therefore, with implementation of APM CUL-2, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 3 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 3 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

4.5-33 *The following paragraphs under the Alternative 5 impact discussion have been revised.*

As with the proposed Mirage-Santa Rosa 115 kV subtransmission line, impacts associated with construction of Alternative 5 related to undiscovered cultural resources would be less than significant with implementation of Mitigation Measures 4.5-4a, 4.5-4b and 4.5-4c (Class II). However, due to the increased ground disturbance that would occur under Alternative 5 associated with trenching for the underground line, this impact would be more severe under Alternative 5 compared to the proposed Mirage-Santa Rosa 115 kV subtransmission line.

Impacts to paleontological resources that would be associated with construction of Alternative 5 would ~~be essentially~~ have the same impact class as those that would result under the proposed Mirage-Santa Rosa 115 kV subtransmission line; impacts would be less than significant with implementation of APMs PA-1 through PA-6 (Class III). However, due to the increased ground disturbance that would occur under Alternative 5 associated with trenching for the underground line, this impact would be more severe under Alternative 5 compared to the proposed Mirage-Santa Rosa 115 kV subtransmission line.

The potential impact to human remains that would be associated with construction of Alternative 5 would ~~be essentially~~ have the same impact class as those that would result under the proposed Mirage-Santa Rosa 115 kV subtransmission line. Therefore, with implementation of APM CUL-2, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 5 associated with trenching for the underground line, this impact would be more severe under Alternative 5 compared to the proposed Mirage-Santa Rosa 115 kV subtransmission line.

4.5-34 *The following paragraphs under the Alternative 6 impact discussion have been revised.*

Portions of the Alternative 6 alignment were not subject to systematic archaeological survey due to lack of access. These segments will be surveyed if this alternative alignment is selected, per Mitigation Measure 4.5-4c. As with the proposed Farrell-Garnet 115 kV alignment, impacts associated with Alternative 6 related to undiscovered cultural resources would be less than significant with implementation of Mitigation Measures 4.5-4a, 4.5-4b, and 4.5-4c (Class II). However, due to the increased ground disturbance that would occur under Alternative 6 associated with trenching for the underground line, this impact would be more severe under Alternative 6 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

Impacts to paleontological resources that would be associated with Alternative 6 would be similar to those that would result under the proposed Farrell-Garnet 115 kV subtransmission line, with the exception that Alternative 6 would not impact the high-sensitivity Imperial Formation. Impacts would be less than significant with implementation of APMs PA-1 through PA-6 (Class III). However, due to the increased ground disturbance that would occur under Alternative 6 associated with trenching for the underground line, this impact would be slightly more severe under Alternative 6 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

The potential impact to human remains that would be associated with Alternative 6 would ~~be essentially~~ have the same impact class as those that would result under the proposed Farrell-Garnet 115 kV subtransmission line. Therefore, with implementation of APM CUL-2, impacts would be less than significant (Class III). However, due to the increased ground disturbance that would occur under Alternative 6 associated with trenching for the underground line, this impact would be more severe under Alternative 6 compared to the proposed Farrell-Garnet 115 kV subtransmission line.

Section 4.6, Geology and Soils

4.6-2 *The first paragraph is clarified as follows.*

The closest known active faults to the study area are associated with the San Andreas fault system, with the northwesterly trending Banning and Coachella segments of the fault system mapped in the north, just north of Interstate 10 (I-10). The northwesterly trending Garnet Hill fault is mapped north of Palm Springs, about a half mile south of I-10. The Garnet Hill fault is mapped as a buried fault and is based on a gravity anomaly survey of the Coachella Valley by a major oil company (Proctor, 1968). The Garnet Hill fault is not mapped as offsetting Holocene-age materials (Jennings, 1994) and, therefore, does not display evidence of being active (Hart et al., 1979). ~~Although~~ Further, the California Division of Mines and Geology (California Geological Survey) has not designated it as an active fault, and Holocene surface rupture was not documented along the Garnet Hill fault in the vicinity of the project area (SCEDC, 2010) ~~the Garnet Hill fault can act as a plane of weakness and move in response to an earthquake on another nearby fault. Ground fractures associated with the 1986 North Palm Springs earthquake were reported along the trace of the Garnet Hill fault and indicate that a near-surface response of weak surfaces occurred at depth (City of Cathedral City, 2002)~~. The north-south trending Palm Canyon fault is mapped as trending towards Palm Springs from the south, but the fault is not considered active by State maps (Jennings, 1994).

4.6-3 *The second sentence of the first paragraph under Seismic Activity has been revised as shown below.*

The 1986 quake registered a magnitude of 5.6 and caused minor ground ~~rupturing~~ cracks along the Banning, Mission Creek, and Garnet Hill faults, but these cracks were due to shaking, not surface rupture.

4.6-5 *The following paragraphs have been added to the beginning of the Geology and Soils Regulatory Context discussion.*

Federal

Institute of Electrical and Electronics Engineers (IEEE) 693 "Recommended Practices for Seismic Design of Substations"

The Institute of Electrical and Electronics Engineers (IEEE) 693 "Recommended Practices for Seismic Design of Substations" was developed by the Substations Committee of the IEEE Power Engineering Society, and approved by the American National Standards Institute and the IEEE-SA Standards Board. This document provides seismic design recommendations for substations and equipment consisting of seismic criteria, qualification methods and levels, structural capacities, performance requirements for equipment operation,

installation methods, and documentation. This recommended practice emphasizes the qualification of electrical equipment.

IEEE 693 is intended to establish standard methods of providing and validating the seismic withstand capability of electrical substation equipment. It provides detailed test and analysis methods for each type of major equipment or component found in electrical substations. This recommended practice is intended to assist the substation user or operator in providing substation equipment that will have a high probability of withstanding seismic events to predefined ground acceleration levels. It establishes standard methods of verifying seismic withstand capability, which gives the substation designer the ability to select equipment from various manufacturers, knowing that the seismic withstand rating of each manufacturer's equipment is an equivalent measure. Although most damaging seismic activity occurs in limited areas, many additional areas could experience an earthquake with forces capable of causing great damage. This recommended practice should be used in all areas that may experience earthquakes.

International Building Code

Published by the International Code-Council (ICC), the scope of this code covers major aspects of construction and design of structures and buildings, the 2006 International Building Code (IBC) replaced the 1997 Uniform Building Code and contains provisions for structural engineering design. Published by the International Conference of Building Officials, the IBC addresses the design and installation of structures and building systems through requirements that emphasize performance. The IBC includes codes governing structural as well as fire- and life-safety provisions covering seismic, wind, accessibility, egress, occupancy, and roofs.

4.6-5 *The following paragraphs replace the Design Standards paragraph of the Geology and Soils Regulatory Context discussion.*

California Building Code

The California Building Code (CBC) has been codified in the California Code of Regulations (CCR) as Title 24, Part 2. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or they are not enforceable. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The 2007 CBC is based on the 2006 IBC published by the

International Code Conference. In addition, the CBC contains necessary California amendments which are based on the American Society of Civil Engineers (ASCE) Minimum Design Standards 7-05. ASCE 7-05 provides requirements for general structural design and includes means for determining earthquake loads as well as other loads (flood, snow, wind, etc.) for inclusion into building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement, and demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California.

The earthquake design requirements take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at the site and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). Design specifications are then determined according to the SDC.

~~**Design Standards**~~

~~Building codes provide specific standards for design and construction of buildings and structures. On January 1, 2008, California officially adopted the 2007 California Building Code (CBC). The purpose of the CBC is to provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use, occupancy, location, and maintenance of all buildings and structures within its jurisdiction. The CBC provides criteria for defining expansive soils.~~

4.6-10 *The following revisions have been made to the Impact 4.6-1 discussion.*

There are no active earthquake faults that are recognized or zoned by the State of California in the immediate vicinity of the Proposed Project alignments and sites. The only fault that would intersect any of the Proposed Project components is the Garnet Hill fault, which is mapped as buried with a location that is postulated across the proposed Farrell-Garnet alignment. Whereas seismic activity is not limited to active faults, ground rupture is typically associated with active faults. However, ground ~~fractures~~ cracks associated with the 1986 North Palm Springs earthquake were reported along the trace of the Garnet Hill fault, but the fractures were a result of ground shaking rather than fault rupture…

4.6-11 *The Impact 4.6-3 discussion has been revised as indicated below.*

In order for liquefaction to occur, there needs to be relatively shallow groundwater conditions, generally at depths of less than 50 feet below the ground surface. Shallow groundwater conditions do not exist in the project area and the

Proposed Project would not cause the groundwater table to rise. ~~Regardless, the potential for liquefaction or other phenomena resulting in dynamic ground settlement, if even present, can be easily reduced with adequate geotechnical and foundation engineering. Therefore, with the implementation of standard engineering practices, any potential impacts associated with liquefaction, if discovered during geotechnical investigations that would be conducted for the Proposed Project, would be reduced to less than significant levels.~~ The potential impact related to seismic-related ground failure, including liquefaction, would be less than significant.

4.6-17 *The following reference is added.*

Southern California Earthquake Data Center (SCEDC), 1986 North Palm Springs Earthquake. http://www.data.scec.org/fault_index/garnet.html. Accessed March 12, 2010.

Section 4.7, Hazards and Hazardous Materials

No changes have been made to Section 4.7, *Hazards and Hazardous Materials.*

Section 4.8, Hydrology and Water Quality

4.8-21 *Mitigation Measure 4.8-4b has been revised as indicated below. The same revision has been incorporated in the Mitigation Monitoring, Reporting, and Compliance Program (see Appendix E).*

Mitigation Measure 4.8-4b: ~~Regarding the engineered erosion control and drainage plan developed as part of the site grading plan (APM HYDRO-2A), SCE shall conduct a topographic and gradient survey of the Whitewater River Wash both upstream and downstream of the proposed pole(s) replacement location within the wash. Post construction topography and gradient of the Whitewater River Wash shall be contoured~~ SCE shall restore all areas on the Whitewater Wash disturbed during construction of the Proposed Project to match the existing conditions, to ensure that the drainage pattern is not altered in a manner that would cause on- or off-site erosion or sedimentation.

Section 4.9, Land Use, Planning and Policies

No changes have been made to Section 4.9, *Land Use Planning and Policies.*

Section 4.10, Mineral Resources

No changes have been made to Section 4.10, *Mineral Resources.*

Section 4.11, Noise

4.11-18 *Mitigation Measure 4.11-2 has been revised as indicated below. The same revision has been incorporated in the Mitigation Monitoring, Reporting, and Compliance Program (see Appendix E).*

> **Mitigation Measure 4.11-2: Mirage Substation.** SCE shall ensure that noise levels associated with the Mirage Substation do not exceed the Riverside County noise standards for stationary sources. Noise control techniques may include, but not be limited to: locating the new transformer with as much setback from the existing residential properties as possible, use of noise walls or equivalent sound attenuation devices, and the use of a transformer with special noise control specifications designed in a way to specifically achieve acceptable regulatory noise standards.
>
> Prior to the installation of the new transformer, SCE shall submit to the CPUC ~~and the County of Riverside~~, for review and approval, a plan that describes the specific measures that will be taken in order to comply with the County's stationary noise standards. Once the proposed transformer is operational, SCE shall retain an acoustical engineer to perform noise measurements in the vicinity of the residences west of Mirage Substation to verify that transformer noise levels comply with the County standards. Documentation of compliance shall be submitted to the CPUC ~~and Riverside County~~. In the event the transformer noise levels violate the standards, additional noise control techniques shall be initiated to correct the violation.

Section 4.12, Population and Housing

4.12-5 *The following edit is made to the first sentence of the last paragraph.*

> Construction activities in the project area are expected to last approximately 12 months, <u>within the 2010-2012 time frame.</u> ~~beginning in 2010 and concluding in mid-2011.~~

Section 4.13, Public Services

No changes have been made to Section 4.13, *Public Services.*

Section 4.14, Recreation

No changes have been made to Section 4.14, *Recreation.*

Section 4.15, Transportation and Traffic

4.15-2 *The following sentence is added to the end of second paragraph.*

Below are summary descriptions of the roadways that would be affected by the Proposed Project components, and/or the alternatives in the Farrell-Garnet and Mirage-Santa Rosa study areas. All traffic data presented for the local roadways are average daily traffic levels.

4.15-2 *The last paragraph is revised as follows.*

Garnet Avenue. The proposed Farrell-Garnet subtransmission line alignment parallels Garnet Avenue from the Garnet Substation to the road's eastern extent, where it dead ends at a road block. Garnet Avenue is a two lane road that parallels the south side of ~~I-5~~ I-10 and has no lane stripes and has low traffic levels.

Section 4.16, Utilities and Service Systems

No changes have been made to Section 4.16, *Utilities and Service Systems.*

Chapter 5. Comparison of Alternatives

5-2 *The third paragraph under Section 5.2, Evaluation of Project Alternatives is clarified as follows.*

In addition to significant unmitigable impacts described above, there are several differentiating impacts that with mitigation would be less than significant. It should be noted that there are two groups of alternative routes: (1) Farrell-Garnet, which includes the Proposed Project and Alternatives 2, 3, 6, and 7 ~~are compared to each other and to the Farrell-Garnet subtransmission line portion of~~, and (2) Mirage-Santa Rosa, which includes the Proposed Project~~,~~ and Alternative 5 ~~is compared to the Mirage-Santa Rosa subtransmission line portion of the Proposed Project~~. Table 5-2 provides a comparison of potential impacts by alternative for each resource category.

5-3 *The following revisions have been made to the first two paragraphs under Section 5.3, Environmentally Superior Alternative.*

As discussed in the previous section, the Proposed Project and all five alternatives would have significant unmitigable impacts on air quality during construction. The extent of the unmitigable impacts on air quality varies slightly by alternative but could not be mitigated to less than significant levels for the Proposed Project or any alternative. Consequently, the selection of an environmentally superior alternative is based on differences in intensity of air quality impacts ~~and type of~~ as well as the differences in intensity of the other environmental issue area impacts that would be less than significant with mitigation (Table 5-2). Based on these differences the identified environmentally superior alternative is the Proposed Project for both the Farrell-Garnett study area

~~is Alternative 3 and the identified environmentally superior alternative for~~ and the Mirage-Santa Rosa study area ~~is Alternative 5~~.

All five alternatives studied in this EIR were variations of alignments that would use existing ROW. The alternatives studied would substitute one component of the Proposed Project (i.e., Alternatives 2, 3, 6, or 7 would be used in lieu of the proposed Farrell-Garnet 115 kV subtransmission line and Alternative 5 would be used in lieu of the proposed Mirage-Santa Rosa 115 kV subtransmission line). For a number of resources, there are no material environmental impact differences between the Proposed Project and alternatives including: agricultural resources; ~~air quality;~~ geology and soils; ~~hazards and hazardous materials;~~ hydrology and water quality; land use, planning, and policies; mineral resources, ~~noise;~~ population and housing; ~~public services;~~ and recreation~~; and utilities and service systems~~.

5-4 – 5-8 *Table 5-2, Devers-Mirage 115 kV Subtransmission System Split Project vs. Alternatives Summary of Environmental Impact Conclusions, has been updated as indicated on the following pages.*

5-9 *The following revisions have been made to the first two paragraphs.*

~~Implementation of the Proposed Project or any of the five alternatives would result in a significant unmitigable (Class I) impact on air quality during construction. Although impacts to air quality would be of varying degree (i.e., alternatives with an underground component would be slightly more adverse than the Proposed Project due to emissions during trenching activities), the impacts would be short term and temporary in nature; therefore, impacts of varying degree between alternatives is not material enough to determine a preferred alternative from an air quality perspective.~~

Resource categories where environmental impacts would either be materially lessened or increased by implementing an alternative to the Proposed Project are discussed below.

- **Air Quality –** Implementation of the Proposed Project or any of the five alternatives would result in a significant unavoidable (Class I) short-term impact on air quality during construction. The short-term impacts to air quality would be of varying degree (i.e., alternatives with an underground component would be slightly more adverse than the Proposed Project due to emissions during trenching activities, and Alternative 7 would be slightly more adverse than the Proposed Project due to the longer length of the alternative compared to the Proposed Project Farrell-Garnet line). Based on these varying degrees of impact, the ranking for the Farrell-Garnet study area (most to least favorable) is as follows: the Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6, Alternative 3, and Alternative 2. For the Mirage-Santa Rosa study area, the Proposed Project Mirage-Santa Rosa line is more favorable than Alternative 5.

TABLE 5-2
DEVERS-MIRAGE 115kV SUBTRANSMISSION SYSTEM SPLIT PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Aesthetics	Impacts determined to be Class II and Class III. The Farrell-Garnet line would include ~~1.5~~5.8 miles of overhead line and the Mirage-Santa Rosa line would include ~~5.8~~1.5 miles of overhead line. **The proposed Mirage-Santa Rosa line would have more of an impact on aesthetics than Alternative 5.**	Impact levels would be similar to the Proposed Project. However, Alternative 2 would result in ~~2.8~~ 3.0 miles less overhead line than the proposed Farrell-Garnet line. **Least impact for the Farrell-Garnet study area.**	Impact levels would be similar to the Proposed Project. However, Alternative 3 would result in 2.9 miles of overhead line along Indian Canyon Road, a major entry way into Palm Springs ~~less overhead line than the proposed Farrell-Garnet line~~. **~~Least~~ Most impact on aesthetics for the Farrell-Garnet study area.**	Impact levels associated with the riser pole would be similar to the Proposed Project. However, Alternative 5 would be constructed underground with the exception of the I-10/UPRR crossing. **Less of an impact on aesthetics than the proposed Mirage-Santa Rosa line.**	Impact levels would be similar to the Proposed Project. However, Alternative 6 would result in 2.6 miles less overhead line than the proposed Farrell-Garnet line.	Impact levels would be similar to the Proposed Project. However, Alternative 7 would result in 3.3 miles more of overhead line than the proposed Farrell-Garnet line. **~~Most impact on aesthetics for the Farrell-Garnet study area.~~**
Agriculture Resources	Impacts determined to be Class III. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**
Air Quality	Would result in temporary significant unmitigable air quality impacts during construction. Operational impacts would be Class III and GHG impacts would be Class II. **~~No Preference~~ Least impacts for both Farrell-Garnet and Mirage-Santa Rosa Lines.**	Impacts would be similar to Proposed Project; however, construction emissions would be slightly higher due to trenching required for the underground segment. **~~No Preference~~ Most impacts for Farrell-Garnet study area.**	Impacts would be similar to Proposed Project; however, construction emissions would be slightly higher due to trenching required for the underground segment. **~~No Preference~~**	Impacts would be similar to Proposed Project; however, construction emissions would be higher due to trenching required for the underground segment. **~~No Preference~~ More impacts than the proposed Mirage-Santa Rosa line.**	Impacts would be similar to Proposed Project. **~~No Preference~~**	Impacts would be similar to Proposed Project; however construction emissions would be slightly higher due to the greater length of the line. **~~No Preference~~**

TABLE 5-2 (Continued)
DEVERS-MIRAGE 115kV SUBTRANSMISSION SYSTEM SPLIT PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Biological Resources	Impacts determined to be Class II and Class III. **Most impacts to biological resources for the Farrell-Garnet and Mirage-Santa Rosa study areas.**	Impacts would be less adverse than the Proposed Project given that: • Although the overall length of the alternative would be 0.2 mile longer than the Proposed Project, it would include ~~2.8~~ 3.0 miles less overhead line and associated operational impacts; and • The alternative crosses through lower quality habitat for the same special status species.	Impacts would be less adverse than the Proposed Project given that: • Although the overall length of the alternative would be 0.7 mile longer than the Proposed Project, it would include 2.9 miles less overhead line and associated operational impacts; • The line would traverse through primarily urban and disturbed areas that lack suitable habitat for most special status species; and • The alternative crosses through lower quality habitat for the same special status species. ~~**Least impacts on biological resources for the Farrell-Garnet study area.**~~	Impacts would be less adverse than the Proposed Project given that: • With almost no overhead lines, operational impacts from this alternative would be less adverse than the Proposed Project; and • The line would traverse through paved streets bordered by ornamental trees that provide poor quality habitat for most special status species. **Less impacts on biological resources than the proposed Mirage-Santa Rosa line.**	Impacts would be less adverse than the Proposed Project given that: • The overall length of the alternative would be 1.6 miles shorter than the Proposed Project; and 2.6 miles less overhead line and associated operational impacts; • The line would not introduce any new above ground power lines where they don't already exist so operational impacts would be less adverse; • The alternative crosses through lower quality habitat for the same special status species.	Impacts would be less adverse than the Proposed Project given that: • The line would not introduce any new above ground power lines where they don't already exist so operational impacts would be less adverse; • The alternative crosses through lower quality habitat for the same special status species. **Least impacts on biological resources for the Farrell-Garnet study area.**
Cultural Resources	Impacts determined to be Class II and Class III. ~~**Most**~~ **Least impacts to cultural resources for the Farrell-Garnet and Mirage-Santa Rosa study areas.**	Impacts would be similar to the Proposed Project. Alternative 2 would result in the most subsurface disturbance and is the only alternative that would result in direct impacts to Garnet Hill.	Impacts would be similar to the Proposed Project.	Impacts would be similar to the Proposed Project. However, Alternative 5 would avoid CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~. However, Alternative 5 would result in substantially	Impacts would be similar to the Proposed Project; however, Alternative 6 would not impact Garnett Hill or the high sensitivity Imperial Formation. Alternative 6 would involve one mile of	Impacts would be similar to the Proposed Project; however, Alternative 7 would not impact Garnett Hill or the high sensitivity Imperial Formation and would involve no underground line

TABLE 5-2 (Continued)
DEVERS-MIRAGE 115kV SUBTRANSMISSION SYSTEM SPLIT PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Cultural Resources (cont.)		**Most impacts for Farrell-Garnet study area.**		more subsurface disturbance. **~~Less impacts than the proposed Mirage-Santa Rosa line.~~** **More impacts than the proposed Mirage-Santa Rosa line.**	underground line work, but would be 4.2 miles long (i.e., less pole drilling).	construction, but would be approximately 9.1 miles long. **~~Least impacts on cultural resources for the Farrell-Garnet study area.~~**
Geology and Soils	Impacts determined to be Class III. **No Preference**	Impacts would be similar to the Proposed Project; however risk of excessive settlement and/or erosion would be slightly higher due to trenching required for the underground segment. **No Preference**	Impacts would be similar to the Proposed Project; however risk of excessive settlement and/or erosion would be slightly higher due to trenching required for the underground segment. **No Preference**	Impacts would be similar to the Proposed Project; however risk of excessive settlement and/or erosion would be slightly higher due to trenching required for the underground segment. **No Preference**	Impacts would be similar to the Proposed Project; however risk of excessive settlement and/or erosion would be slightly higher due to trenching required for the underground segment. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**
Hazards and Hazardous Materials	Impacts determined to be Class II and Class III. **~~No Preference~~** **Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.**	Impacts would be similar to the Proposed Project; however, Alternative 2 would be located closer to existing schools and would have a greater risk of encountering previously unknown contamination and impacting an evacuation route due to trenching requirements for the underground segment. **~~No Preference~~** **Most impacts for Farrell-Garnet study area.**	Impacts would be similar to the Proposed Project; however, Alternative 3 would be located closer to existing schools and would have a greater risk of encountering previously unknown contamination and impacting an evacuation route due to trenching requirements for the underground segment. **~~No Preference~~**	Impacts would be similar to the Proposed Project; however, Alternative 5 would have a greater risk of encountering previously unknown contamination and impacting an evacuation route due to trenching requirements for the underground segment. **~~No Preference~~** **More impacts than the proposed Mirage-Santa Rosa line.**	Impacts would be similar to the Proposed Project; however, Alternative 6 would have a greater risk of encountering previously unknown contamination and impacting an evacuation route due to trenching requirements for the underground segment. **~~No Preference~~**	Impacts would be similar to the Proposed Project; however, Alternative 7 would be located closer to existing schools. **~~No Preference~~**

TABLE 5-2 (Continued)
DEVERS-MIRAGE 115kV SUBTRANSMISSION SYSTEM SPLIT PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Hydrology and Water Quality	Impacts determined to be Class II and Class III. **No Preference**	Impacts would be similar to the Proposed Project; however, soil disturbance during trenching for the underground segment would result in slightly higher impacts to water quality. **No Preference**	Impacts would be similar to the Proposed Project; however soil disturbance during trenching for the underground segment would result in slightly higher impacts to water quality. **No Preference**	Impacts would be similar to the Proposed Project; however, soil disturbance during trenching for the underground segment would result in slightly higher impacts to water quality. **No Preference**	Impacts would be similar to the Proposed Project; however, soil disturbance during trenching for the underground segment would result in slightly higher impacts to water quality. **No Preference**	Impacts would be similar to the Proposed Project; however, the greater amount of pole replacement would result in slightly higher impacts to water quality. **No Preference**
Land Use, Planning, and Policies	Impacts determined to be Class II and Class III. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**
Mineral Resources	No impacts were identified. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**
Noise	Impacts determined to be Class II and Class III. ~~**No Preference**~~ **Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.**	Impacts would be similar to the Proposed Project; however, underground portions would have greater noise and vibration impacts from construction, though less impacts from corona noise. ~~**No Preference**~~	Impacts would be similar to the Proposed Project; however, Alternative 3 would ~~have~~ result in the most underground construction activity ~~portions~~ adjacent to residences and would have greater noise and vibration impacts from construction, though less impacts from corona noise. ~~**No Preference**~~ **Most impacts for Farrell-Garnet study area.**	Impacts would be similar to the Proposed Project; however, the presence of a greater number of residences in proximity to this alternative could result in greater temporary impacts from construction activities. ~~**No Preference**~~ **More impacts than the proposed Mirage-Santa Rosa line.**	Impacts would be similar to the Proposed Project; however, underground portions would have greater noise and vibration impacts from construction, though less impacts from corona noise. ~~**No Preference**~~	Impacts would be similar to the Proposed Project; however, the alternative's proximity to a greater number of residential receptors would result in greater exposure to ambient corona noise. ~~**No Preference**~~

TABLE 5-2 (Continued)
DEVERS-MIRAGE 115kV SUBTRANSMISSION SYSTEM SPLIT PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Population and Housing	No impacts were identified. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**
Public Services	Impacts determined to be Class II and Class III. ~~**No Preference**~~ **Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.**	Impacts would be similar to the Proposed Project; however additional lane closure required for the underground portion could lead to slightly higher impacts to emergency response times. ~~**No Preference**~~	Impacts would be similar to the Proposed Project; however Alternative 3 would result in the most underground line work in roads in the Farrell-Garnet study area, and the additional lane closure required for the underground portion could lead to slightly higher impacts to emergency response times. ~~**No Preference**~~ **Most impacts for Farrell-Garnet study area.**	Impacts would be similar to the Proposed Project; however Alternative 5 would result in substantially more underground line work in roads than the Mirage-Santa Rosa line, and the additional lane closure required for the underground portion could lead to slightly higher impacts to emergency response times. ~~**No Preference**~~ **More impacts than the proposed Mirage-Santa Rosa line.**	Impacts would be similar to the Proposed Project; however additional lane closure required for the underground portion could lead to slightly higher impacts to emergency response times. ~~**No Preference**~~	Impacts would be similar to the Proposed Project. ~~**No Preference**~~
Recreation	Impacts determined to be Class III. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**	Impacts would be similar to the Proposed Project. **No Preference**
Transportation and Traffic	Impacts determined to be Class II and Class III. **Least impacts to traffic and transportation for the Farrell-Garnet and Mirage-Santa Rosa study areas.**	Impact levels would be similar to the Proposed Project; however additional roadway closures and roadway damage that would result from trenching activities along the ~~3.0~~ 3.2-mile underground segment would lead to higher temporary	Impact levels would be similar to the Proposed Project; however additional roadway closures and roadway damage that would result from trenching activities along the 3.6-mile underground segment would lead to higher temporary	Impact levels would be similar to the Proposed Project; however additional roadway closures and roadway damage that would result from trenching activities along the 3.0-mile underground segment would lead to higher temporary	Impact levels would be similar to the Proposed Project; however additional roadway closures and roadway damage that would result from trenching activities along the 1.0-mile underground segment would lead to higher temporary	Impact levels would be similar to the Proposed Project; however since a greater number of roadways would be crossed by this alternative, temporary impacts to traffic during construction would be slightly higher than the Proposed Project.

TABLE 5-2 (Continued)
DEVERS-MIRAGE 115kV SUBTRANSMISSION SYSTEM SPLIT PROJECT VS. ALTERNATIVES
SUMMARY OF ENVIRONMENTAL IMPACT CONCLUSIONS

Resource Area	Proposed Project	Alternative 2	Alternative 3	Alternative 5	Alternative 6	Alternative 7
Transportation and Traffic (cont.)		impacts during construction activities.	impacts during construction activities. **Most impacts to traffic and transportation for the Farrell-Garnet study area.**	impacts during construction activities. **More impacts to traffic and transportation than the proposed Mirage-Santa Rosa line.**	impacts during construction activities.	
Utilities and Service Systems	Impacts determined to be Class III. ~~**No Preference**~~ **Least impacts for both Farrell-Garnet and Mirage-Santa Rosa study areas.**	Impacts would be similar to the Proposed Project. However, Alternative 2 would result in the most underground line work in the Farrell-Garnet study area and would involve the greatest potential for construction activities to disturb existing subsurface utilities. ~~**No Preference**~~ **Most impacts for Farrell-Garnet study area.**	Impacts would be similar to the Proposed Project. ~~**No Preference**~~	Impacts would be similar to the Proposed Project. However, Alternative 5 would result in more underground line work compared to the proposed Mirage-Santa Rosa line and would involve the most potential for construction activities to disturb existing subsurface utilities. ~~**No Preference**~~ **More impacts than the proposed Mirage-Santa Rosa line.**	Impacts would be similar to the Proposed Project. ~~**No Preference**~~	Impacts would be similar to the Proposed Project. ~~**No Preference**~~

5-9 *The text of the first bullet is revised as follows.*

- **Aesthetics** – Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. Alternative 7 would involve the most amount of overhead line in the Farrell-Garnet study area, including the most overhead line in residential areas and a crossing of I-10. Alternative 3 would involve the least amount of overhead line with no I-10 crossings, but would result in nearly doubling the height and base diameter of structures along Indian Canyon Road which is a major entryway to the City of Palm Springs. Alternative 2 is considered the most favorable for aesthetics because the overhead portion of that line would be in an area with low visual sensitivity. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: ~~Alternative 3, Alternative 6,~~ Alternative 2, the Proposed Project Farrell-Garnet line, Alternative 6, Alternative 7, and Alternative ~~7~~3. For the Mirage-Santa Rosa study area, Alternative 5 would result in only a short span of overhead line across I-10 and the UPRR, compared to the Proposed Project Mirage-Santa Rosa line, which would include approximately 1.5 miles of overhead line. Therefore, Alternative 5 is more favorable than the Proposed Project Mirage-Santa Rosa line.

5-9 *The text of the second bullet is revised as follows.*

- **Biological Resources –** Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. The Proposed Project alignments contain more suitable habitat for special status species than do the alternative alignments. Compared to the Proposed Project Farrell-Garnet line, Alternative ~~3~~7 would result in the ~~least~~ most amount of overhead line ~~and associated long-term impacts~~; however, Alternative 7 would be constructed in the least suitable habitat for special status species, making it the most favorable alternative, followed by Alternative 6, Alternative 3, Alternative 2, and the Proposed Project Farrell-Garnet line~~, and Alternative 7~~. Compared to the Proposed Project Mirage-Santa Rosa line, which would result in approximately 1.5 miles of new overhead line in more suitable habitat for special status species, Alternative 5 would result in only a short segment of overhead line associated with the I-10 and UPRR crossings and it would be in less suitable habitat for special status species.

5-9 *The text of the third bullet is revised as follows.*

- **Cultural Resources** – Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. Alternative 6 and Alternative 7 would have no impact on the Garnet Hill cultural resource compared to the Proposed Project Farrell-Garnet line, Alternative 2, and Alternative 3. It should be noted that Alternative 2 is the only alignment that would include direct impacts to Garnet Hill. ~~Between Alternatives 6 and 7, Alternative 6~~ Alternatives 2, 3, and 6 would include ~~a~~ higher potential for an undiscovered find compared to the Proposed Project Farrell-Garnet line and Alternative 7 due to the ~~one-mile~~ underground line

construction work that would be associated with ~~Alternative 6~~ those alternatives. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6, Alternative 3, ~~the Proposed Project Farrell-Garnet line,~~ and Alternative 2. Compared to the proposed Mirage-Santa Rosa line, Alternative 5 would avoid CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~. However, Alternative 5 would result in substantially more subsurface disturbance associated with trenching for the underground line compared to the Proposed Project Mirage-Santa Rosa line, which would result in more severe of an impact related to undiscovered cultural and paleontological resources. Therefore, ~~Alternative 5 is more favorable than~~ the Proposed Project Mirage-Santa Rosa line is more favorable than Alternative 5.

5-10 *The following paragraph has been added to the environmentally superior alternative discussion before the first complete paragraph.*

- **Noise –** Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. Compared to the alternative lines, the Proposed Project lines would involve the least duration of construction work in the vicinity of sensitive receptors (i.e., residences). Compared to the Proposed Project Farrell-Garnet line, Alternative 3 would result in the highest duration of construction activity in the vicinity of sensitive receptors due to the longest length of underground line work that would occur near residences, followed by Alternative 2 and Alternative 6. Alternative 7 would not include underground line work, but would affect more sensitive receptors than the Proposed Project Farrell-Garnet line. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: the Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6, Alternative 2, and Alternative 3. Compared to the Proposed Project Mirage-Santa Rosa line, Alternative 5 would result in a longer duration of construction activity in the vicinity of more sensitive receptors. Therefore, the Proposed Project Mirage-Santa Rosa line is more favorable than the Alternative 5 line.

5-10 *The following paragraph has been added to the environmentally superior alternative discussion before the first complete paragraph.*

- **Public Services –** Impacts would be potentially significant, but mitigable to less than significant for all of the alternatives. Compared to the alternative lines, the Proposed Project lines would involve the least potential for construction activities to affect vehicle access and fire department response times because the alternatives with underground components would require lengthier lane closures that could more severely affect emergency response times, and Alternative 7 would be slightly more adverse than the Proposed Project due to the longer length of the alternative and more lane closures associated with overhead road crossings compared to the Proposed Project Farrell-Garnet line. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: the Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6,

Alternative 2, and Alternative 3. For the Mirage-Santa Rosa study area, the Proposed Project Mirage-Santa Rosa line is more favorable than the Alternative 5 line.

5-10 *The following paragraph has been added to the environmentally superior alternative discussion before the first complete paragraph.*

- **Utilities and Service Systems –** Impacts would be less than significant for all of the alternatives. Compared to the alternative lines, the Proposed Project lines would involve the least potential for construction activities to disturb utilities because the alternatives with underground components would have a higher potential to disturb underground utilities, and Alternative 7 would be slightly more adverse than the Proposed Project due to the longer length of the alternative and the greater potential for the additional pole excavations to disturb underground utilities compared to the Proposed Project Farrell-Garnet line. The ranking for the Farrell-Garnet study area (most to least favorable) is as follows: the Proposed Project Farrell-Garnet line, Alternative 7, Alternative 6, Alternative 3, and Alternative 2. For the Mirage-Santa Rosa study area, the Proposed Project Mirage-Santa Rosa line is more favorable than the Alternative 5 line.

5-10 *The last paragraph under Section 5.3, Environmentally Superior Alternative, has been replaced with the following paragraphs.*

~~While the Proposed Project subtransmission lines would result in the least amount of transportation and traffic impacts compared to the alternatives, these impacts would be primarily short-term and would conclude at the end of construction period. Because the Alternative 5 subtransmission line would result in less long-term aesthetics, biological resources, and cultural resources impacts compared to the Proposed Project Mirage-Santa Rosa line, Alternative 5 is selected as the Environmentally Superior Alternative for the Mirage-Santa Rosa study area. With regard to the Farrell-Garnet study area, Alternative 3 would result in the least amount of long-term aesthetics and biological resources impacts compared to the Proposed Project Farrell-Garnet subtransmission line and Alternatives 2, 6, and 7; however, Alternative 7 would result in the least amount of impacts to cultural resources compared to the Proposed Project Farrell-Garnet subtransmission line and Alternatives 2, 3, and 6. After considering all impacts, and the long length of Alternative 7, Alternative 3 is selected as the Environmentally Superior Alternative for the Farrell-Garnet study area.~~

For the ranking of alternatives to support the identification of the Environmentally Superior Alternatives for each geographical study area, a weighting factor was assigned to each resource area for which at least some differentiation between alternatives was discernable. Air quality was assigned the highest weighting because it had the only significant and unavoidable impact. Resource areas wherein the impacts would be long term, though admittedly less

than significant, were assigned the next highest weighting. Aesthetics, biological resources, and cultural resources fall into that category. Resource areas wherein the impacts would be short term but most noticeable to many people (i.e., noise, and transportation and traffic) were assigned the third highest weighting. And finally, resource areas wherein the impacts would be short term but generally not noticeable to many people (i.e., hazards/hazardous materials, public services, and utilities and service systems) were assigned the lowest weighting. No weighting was assigned to resources areas for which no discernable distinction could be made from the Draft EIR analysis (i.e., agriculture resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, population and housing, and recreation).

The Proposed Project subtransmission lines would result in the least severe air quality, cultural resources, noise, transportation and traffic, hazards and hazardous materials, public services, and utilities and service systems impacts compared to the alternatives, and in the Farrell-Garnet study area the Proposed Project would result in the second least severe impacts related to aesthetics. However, the Proposed Project would result in the most severe impacts related to biological resources in both study areas and would result in the most severe impacts related to aesthetics in the Mirage-Santa Rosa study area. Because the Proposed Project subtransmission lines would result in less severe significant and unavoidable air quality construction impacts than the alternatives, with the exception of biological resources and aesthetics, and would result in less severe impacts compared to the alternatives for all of the other resource areas where a preference is identified, the Proposed Project subtransmission lines (i.e., the proposed Farrell-Garnet Subtransmission line and the Mirage-Santa Rosa Subtransmission lines) are selected as the Environmentally Superior Alternatives for both the Farrell-Garnett and Mirage-Santa Rosa study areas.

5-10, -11 *The paragraph under Section 5.4.2, Summary of the Environmentally Superior Alternative and its Impacts, has been revised as follows.*

The Environmentally Superior Alternatives are defined in Section 5.3 as ~~Alternative 3~~ the Proposed Project for both the Farrell-Garnet study area and ~~Alternative 5 for~~ the Mirage-Santa Rosa study area. The impacts of ~~Alternatives 3 and 5~~ the Proposed Project are defined in each resource area's impact analysis in Sections 4.1 through 4.16, and are also summarized in Table 5-2, above. The Environmentally Superior Alternatives would each have the same short-term construction related significant and unmitigable (Class I) impacts on air quality. As discussed in Sections 4.1 through 4.16, other types of impacts would also occur under the Proposed Project, but they would be either less than significant or mitigable to less than significant levels.

5-11 *The paragraph under Section 5.4.3, Conclusion: Comparison of the Environmentally Superior Alternative with the No Project Alternative, is revised as follows.*

The Environmentally Superior Alternatives ~~(Alternatives 3 and 5)~~ as defined above would reduce long-term aesthetics and biological resources impacts and would have minimal long-term impacts on residences or other sensitive land uses. Under the No Project Alternative scenario, SCE may be required to construct new subtransmission and transmission lines and/or additional power generation in or near the study area to supply power to the Electrical Needs Area. It would be overly speculative for this EIR to assume where the new subtransmission and transmission facilities and/or power generation facilities would be sited; however, it is reasonable to assume that at a minimum, environmental impacts associated with the No Project Alternative scenario would not be less than those from the Environmentally Superior Alternatives. Therefore, the Environmentally Superior Alternatives are preferred over the No Project Alternative.

Chapter 6. CEQA Statutory Sections

No changes have been made to Chapter 6, *CEQA Statutory Sections.*

Chapter 7. Report Preparers

No changes have been made to Chapter 7, *Report Preparers.*

Chapter 8. Mitigation Monitoring, Reporting, and Compliance Program

All text changes to the Draft EIR mitigation measures described in Section 5 are also reflected in the Final EIR Appendix E, *Mitigation, Monitoring, Reporting and Compliance Program*.

8-32 *The Monitoring/Reporting Requirements and Timing entries for Mitigation Measure 4.8-4b in Table 8-1, Mitigation Monitoring, Reporting and Compliance Program for the Devers-Mirage 115 kV Subtransmission System Split Project, have been revised as follows. The same clarification has been incorporated in Appendix E.*

Monitoring/Reporting Requirements	Timing
~~SCE to submit results of topographic and gradient survey to CPUC for review. CPUC mitigation monitor to inspect compliance.~~ CPUC mitigation monitor to monitor compliance.	~~Survey results to be submitted prior to construction activities within the Whitewater River Wash.~~ Following construction activities within the Whitewater River Wash. Inspection to be performed following completion of grading activities within the wash.

8-32, -33 *The Mitigation/Reporting Requirements entry for Mitigation Measure 4.11-2 in Table 8-1, Mitigation Monitoring, Reporting and Compliance Program for the Devers-Mirage 115 kV Subtransmission System Split Project, has been revised as follows. The same clarification has been incorporated in Appendix E.*

Monitoring/Reporting Requirements
SCE to submit plan for compliance to ~~Riverside County and~~ CPUC for review and approval. SCE to retain an acoustical engineer, and submit documentation of compliance to the CPUC~~ and Riverside County~~.

Appendix B

B-1 *The referenced sentence in the first paragraph has been revised as follows.*

Units of measure are Gauss (G) or milliGauss (mG, ~~111000~~ 1/1000 of a Gauss).

B-2 *The following clarification to the top of the page is included.*

Its recommendations were filed with the Commission in March of 1992, and became the basis for the CPUC's EMF Policy established in D.93-11-013.

B-2 *The second paragraph is clarified as follows.*

Findings – Based on the work of the Consensus Group, written testimony, and evidentiary hearings, the CPUC issued ~~its~~ decisions D.93-11-013 and ~~(~~D.06-01-042~~)~~ to address . . .

B-4 *The referenced sentence in the last paragraph is revised as follows.*

Specific measures to be implemented are described in the attached Field Management Plan for the Proposed Project (Appendix ~~D~~ B – Section 2) and alternatives (Appendix ~~D~~ B – Section 3).

CHAPTER 6

Agencies, Organizations, and Persons that Received the Final EIR

The Lead Agency (the California Public Utilities Commission), the project Applicant (Southern California Edison), and listed parties on the CPUC service list received a hard copy of the Final EIR. All other agencies, organizations, and individuals that submitted comments on the Draft EIR received a compact disc (CD) of the Final EIR unless a hard copy was specifically requested. Table 6(RTC)-1 shows the commenters who received a hard copy of the Final EIR via an overnight delivery service, while Table 6(RTC)-2 shows agencies and individuals who received a CD of the document.

TABLE 6(RTC)-1
AGENCIES, ORGANIZATIONS AND INDIVIDUALS
SENT THE FINAL EIR VIA OVERNIGHT DELIVERY SERVICE

AGENCY/ORGANIZATION/ INDIVIDUAL	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
LEAD AGENCY/APPLICANT						
California Public Utilities Commission	Eric	Chiang	505 Van Ness Avenue, Energy Division, Room 4A	San Francisco	CA	94102
Southern California Edison Company	Milissa	Marona	2244 Walnut Grove Avenue, Rm. 370	Rosemead	CA	91770
LOCAL LIBRARIES SERVING AS REPOSITORIES						
Cathedral City Branch Library	Amy	Dotson	33520 Date Palm Drive	Cathedral City	CA	92234-1307
Thousand Palms Branch Library	Sharon		31189 Roberts Road	Thousand Palms	CA	92276-3235
STATE AGENCIES						
California Native American Heritage Commission	David	Singleton	915 Capitol Mall, Room 364	Sacramento	CA	95814
California State Clearinghouse			1400 Tenth Street	Sacramento	CA	95814

TABLE 6(RTC)-2
AGENCIES AND INDIVIDUALS SENT A COMPACT DISC (CD)
OF FINAL EIR VIA UNITED STATES POSTAL SERVICE

AGENCY/ORGANIZATION/ RESIDENT	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
LOCAL AGENCIES						
City of Cathedral City	Bill	Bayne	68-700 Avenida Lalo Guerrero	Cathedral City	CA	92234
City of Palm Springs	Marcus	Fuller	3200 Tahquitz Canyon Drive	Palm Springs	CA	92263-2743
Riverside County Transportation Department, Dester Permit Assistance Center	Mojahed	Salama	38686 El Cerrito Road	Palm Desert	CA	92211
County of Riverside	George	Johnson	4080 Lemon St. 8th Floor	Riverside	CA	92501
County of Riverside	Ron	Goldman	4080 Lemon St. 9th Floor	Riverside	CA	92501
County of Riverside	Roy	Wilson	4080 Lemon St. 5th Floor	Riverside	CA	92501
South Coast Air Quality Management District	Steve	Smith	21865 Copley Drive	Diamond Bar	CA	91765-4182
Riverside County LAFCo	George J.	Spiliotis	3850 Vine Street, Suite 110	Riverside	CA	92507-4277
City of Palm Desert City Hall - Planning Department	Lori	Aylaian	73-510 Fred Waring Drive	Palm Desert	CA	92260
City of Palm Desert Public Works	Mark	Greenwood	73-510 Fred Waring Drive	Palm Desert	CA	92260
City of Palm Desert	Carlos	Artega	73-510 Fred Waring Drive	Palm Desert	CA	92260
City of Rancho Mirage Community Development Department	Randy	Bynder	69-825 Highway 111	Rancho Mirage	CA	92270
City of Indian Wells Planning Department	Corrie	Kates	44-950 Eldorado Drive	Indian Wells	CA	92210
Coachella Valley Water District	Georgia	Celehar	P.O. Box 1058	Coachella	CA	92236
STATE AGENCIES						
California Dept. of Transportation (Caltrans) District 8	Bill	Mosby	464 W. 4th Street, 6th Floor MF 1221	San Bernardino	CA	92401
California Department of Transportation, Division of Aeronautics--M.S. #40	Sandy	Hesnard	1120 N Street, P.O. Box 942873	Sacramento	CA	94273-0001
California Department of Public Health Environmental Management Branch	Robin	Hook	1616 Capitol Avenue, MS 7402	Sacramento	CA	95814-7402
Regional Water Quality Control Board	John	Carmona	3737 Main Street, Suite 500	Riverside	CA	92501-3348
California Department of Toxic Substances Control	Jim	Marxen	1001 I Street	Sacramento	CA	95814
California Department of Fish and Game, Region 6	Curt	Taucher	4665 Lampson Avenue, Suite J	Los Alamitos	CA	90720
California Resources Agency	Mike	Chrisman	1416 9th Street, Ste 1311	Sacramento	CA	95814
Office of Historic Preservation	Milford Wayne	Donaldson	1416 9th Street, Room 1442-7	Sacramento	CA	95814
California Department of Parks and Recreation, Inland Empire District	Enrique	Arroyo	17801 Lake Perris Drive	Perris	CA	92571
California State Lands Commission	Paul D.	Thayer	100 Howe Ave. Suite 100 South	Sacramento	CA	95825
Coachella Valley Mountains Conservancy	Gary	Hund	73-710 Fred Waring Drive, Suite 205	Palm Desert	CA	92260
California Air Resources Board	Catherine	Witherspoon	1001 I Street	Sacramento	CA	95812

TABLE 6(RTC)-2 (Continued)
AGENCIES AND INDIVIDUALS SENT A COMPACT DISC (CD)
OF FINAL EIR VIA UNITED STATES POSTAL SERVICE

AGENCY/ORGANIZATION/ RESIDENT	FIRST NAME	LAST NAME	STREET	CITY	STATE	ZIP CODE
FEDERAL AGENCIES						
US Army Corps of Engineers, Los Angeles District	David M.	Van Dorpe	915 Wilshire Blvd, Suite 1101	Los Angeles	CA	90017-3401
US Army Corps of Engineers, Los Angeles District	David	Castanon	915 Wilshire Blvd, Suite 1101	Los Angeles	CA	90017-3401
Bureau of Land Management	Diane	Gomez	1201 Bird Center Drive	Palm Springs	CA	92262
U.S. Bureau of Land Management	Mark	Massar	1201 Bird Center Drive	Palm Springs	CA	92262
U.S. Bureau of Land Management	John	Kalish	1201 Bird Center Drive	Palm Springs	CA	92262
U.S. Environmental Protection Agency Southern California Field Office	Steven	John	600 Wilshire Blvd., Suite 1460	Los Angeles	CA	90017
U.S. Fish and Wildlife Service	Eric	Portal	6010 Hidden Valley Road, Suite 101	Carlsbad	CA	92011
U.S. Fish and Wildlife Service	Pete	Sorenson	6010 Hidden Valley Road, Suite 101	Carlsbad	CA	92011
Coachella Valley NWR	Ginny	Short	P.O. Box 188	Thousand Palms	CA	92276
NATIVE AMERICANS						
Agua Caliente Band of Cahuilla Indians	Richard	Begay	650 Tahquitz Canyon Way	Palm Springs	CA	92262
	Alvino	Siva	2034 W. Westward	Banning	CA	92220
	Anthony J.	Andreas Jr.	3022 W. Nicolet Street	Banning	CA	92220
Augustine Band of Cahuilla Mission Indians	Mary Ann	Green	P.O. Box 846	Coachella	CA	92236
Augustine Band of Cahuilla Mission Indians	Karen	Kupcha	P.O. Box 846	Coachella	CA	92236
Cabazon Band of Mission Indians	John A.	James	84245 Indio Springs Parkway	Indio	CA	92203-3499
Cabazon Band of Mission Indians	Judy	Stapp	84245 Indio Springs Parkway	Indio	CA	92203-3499
Morongo Band of Mission Indians	Britt W.	Wilson	245 N. Murray Street, Suite C	Banning	CA	92220
Ramona Band of Mission Indians	Terry	Hughes	P.O. Box 1291	Yucca Valley	CA	92286
Santa Rosa Band of Mission Indians	Ernest	Morreo	P.O. Box 609	Hemet	CA	92546
Torres-Martinez Desert Cahuilla Indians			P.O. Box 1160	Thermal	CA	92274
Torres-Martinez Desert Cahuilla Indians	Raymond	Torres	P.O. Box 1160	Thermal	CA	92274
Torres-Martinez Desert Cahuilla Indians	William J.	Contreras	P.O. Box 1160	Thermal	CA	92274
PUBLIC COMMENTERS						
	Thomas C.	MacMaster	641 Dunes Court	Palm Springs	CA	92264

APPENDIX A

Notice of Availability

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STATE OF CALIFORNIA **ARNOLD SCHWARZENEGGER, Governor**

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

To: **State Clearinghouse, Responsible and Trustee Agencies, Property Owners, & Interested Parties**

From: **Eric Chiang, Environmental Project Manager**

Subject: **NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND PUBLIC MEETING:**
Devers-Mirage 115 kV Subtransmission System Split Project (A.08-01-029)
SCH No. 2008041087

Date: **January 7, 2010**

The California Public Utilities Commission (CPUC) has prepared a Draft Environmental Impact Report (Draft EIR) under the California Environmental Quality Act (CEQA) for consideration of Southern California Edison's (SCE) application to construct, operate, and maintain the Devers-Mirage 115 kV Subtransmission System Split Project (Proposed Project). The Draft EIR details the Proposed Project, evaluates and describes the potential environmental impacts associated with the construction, operation, and maintenance of the Proposed Project, identifies those impacts that could be significant, and presents mitigation measures which, if adopted by the CPUC, could avoid or minimize these impacts. The Draft EIR also evaluates alternatives to the Proposed Project, including the No Project Alternative, as required by CEQA.

Description of the Proposed Project.
The Proposed Project is located within central Riverside County, including portions of the cities of Palm Springs, Rancho Mirage, Palm Desert, Cathedral City, and Indian Wells, and unincorporated areas of Riverside County, including the community of Thousand Palms. See the map that follows this notice for an illustration of the project area. The Proposed Project includes the following major elements:

- replacement of approximately 5.3 miles of existing 115 kilovolt (kV) single-circuit subtransmission line with new higher capacity double-circuit 115 kV subtransmission lines and replacement of support structures within existing SCE rights-of-way (ROWs), franchise locations (public ROWs), and private property between Farrell and Garnet Substations in the City of Palm Springs;
- construction of a new 115 kV subtransmission line from Mirage Substation south to Interstate 10, adjacent to the east side of Tri-Palm Estates and within SCE's existing ROWs or franchise locations;
- looping the existing Devers-Coachella Valley 220 kV transmission line from an existing ROW to the south for approximately 0.8 mile on double-circuit lattice steel towers to Mirage Substation, located near the community of Thousand Palms;
- installation of a new 280 megavolt amperes (MVA) 200/115 kV transformer, two new 220 kV circuit breakers, and five new 115 kV circuit breakers at SCE's existing Mirage Substation; and
- subtransmission line reconfigurations at the intersections of Bob Hope Drive and Dinah Shore Drive, Portola Avenue and Gerald Ford Drive, and Varner Road and Date Palm Drive.

The Proposed Project would also include additional equipment and relay installations at Mirage, Concho**,** Indian Wells, Santa Rosa, Eisenhower, Farrell, Garnet, Thornhill, and Tamarisk Substations located in the cities of Palm Springs, Rancho Mirage, Indian Wells, Cathedral City, Palm Desert, and unincorporated areas of Riverside County, including the community of Thousand Palms. The Proposed Project would also include the transfer of existing fiber optic cable to new support structures and installation of new fiber optic and digital telecommunications equipment.

The objectives of the Proposed Project are to maintain electric system reliability, enhance operational flexibility, and serve projected electrical demand in the cities of Palm Springs, Rancho Mirage, Cathedral City,

Palm Desert, Indian Wells, and unincorporated areas of Riverside County, including the community of Thousand Palms. Construction of the project is proposed to begin in the second quarter of 2010 and be operational by mid-2011.

Public Comment on the Draft EIR.
The Draft EIR is available for a 45-day public comment period from January 8, 2010 through February 22, 2010. The public may present comments and concerns regarding the Proposed Project and the adequacy of the Draft EIR. Written comments on the Draft EIR must be postmarked or received by fax or e-mail no later than **February 22, 2010**. Please be sure to include your name, address, and telephone number in your correspondence.

Written comments on the Draft EIR should be sent to:

Mr. Eric Chiang
Devers-Mirage 115 kV Subtransmission System Split Project
c/o Environmental Science Associates
1425 N. McDowell Boulevard, Suite 200
Petaluma, CA 94954
Voicemail: (707) 795-0940; Fax: (707) 795-0902
E-mail: devers-mirage@esassoc.com

The CPUC will also hold a public comment meeting to receive oral and written comments from interested parties. Following the end of the public comment period, responses to all comments received on the Draft EIR and submitted within the specified 45-day review period will be prepared by the CPUC and included in a response to comments document, which together with the Draft EIR, will constitute the Final EIR for the Proposed Project. The public meeting will be held:

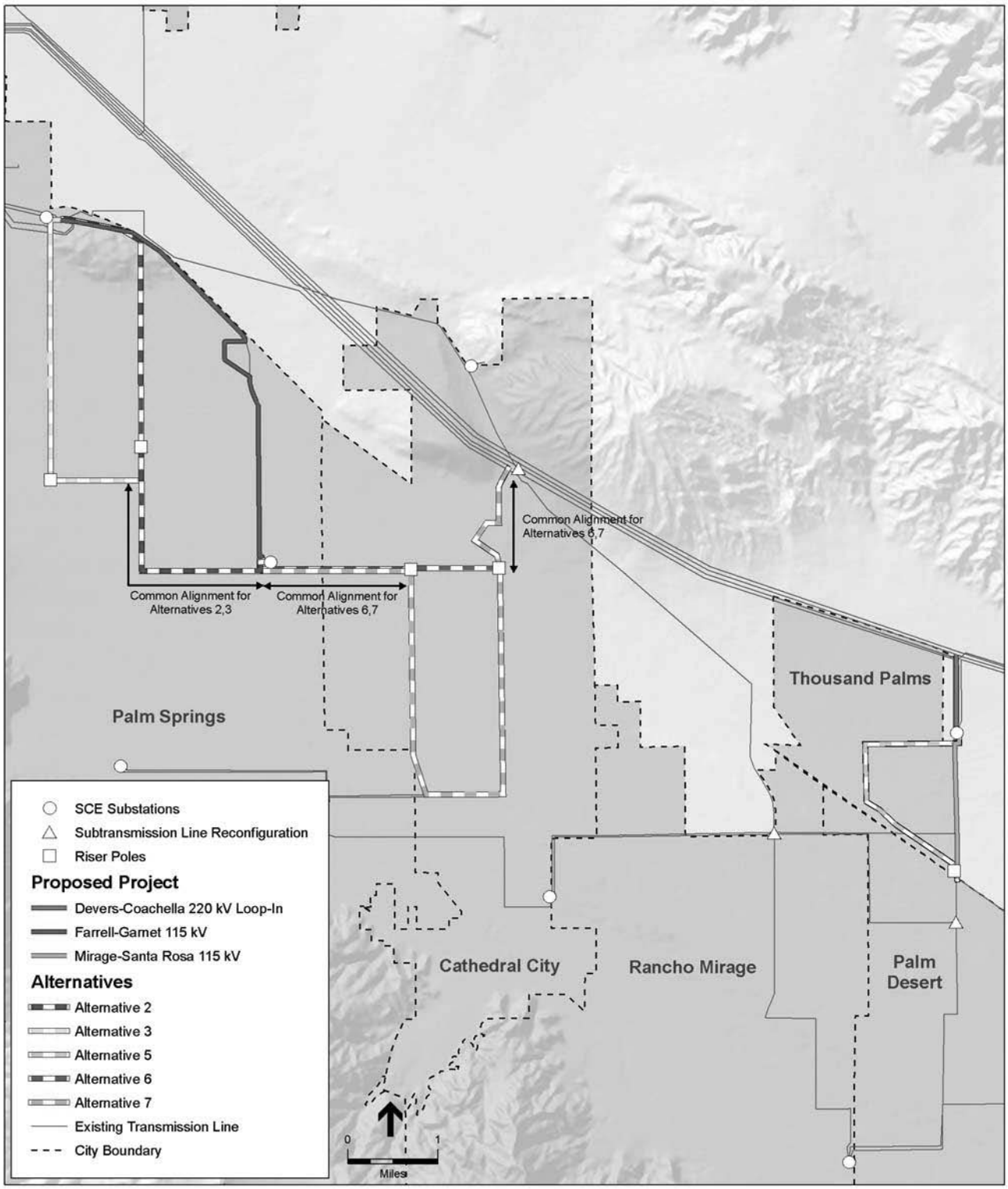
Friday January 29, 2010
6:30 pm – 8:30 pm
CSUSB Palm Desert Campus, Mary Stuart Rogers Gateway Building (Classroom RG-303)
37-500 Cook Street (b/w Gerald Ford Dr. and Frank Sinatra Dr.)
Palm Desert, CA 92211

Availability of Draft EIR.
Copies of the Draft EIR are available for public review on the project website: http://www.cpuc.ca.gov/Environment/info/esa/devers-mirage/devers.html. This website will be used to post all public documents during the environmental review process and to announce any upcoming public meetings. Hard copies or CD copies of the Draft EIR may be requested by telephone at (707) 795-0940 or by e-mail at devers-mirage@esassoc.com.

Additionally, copies of the Draft EIR are available at the following branches of the Riverside County Library:

Cathedral City Branch 33520 Date Palm Drive. Cathedral City, CA 92234-1307 Phone : (760) 328-4262	Thousand Palms Branch 31189 Robert Road Thousand Palms, CA 92276-3235 Phone: (760) 343-1556

REMINDER: Draft EIR comments will be accepted by fax, e-mail, or postmark through February 22, 2010. Please be sure to include your name, address, and telephone number.



Devers-Mirage 115 kV Subtransmission System Split Project . 207059

SOURCE: SCE, 2008

Project Overview

APPENDIX B

Draft EIR Newspaper Legal Advertisements

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PROOF OF PUBLICATION
(2015.5.C.C.P)

This is space for County Clerk's Filing Stamp

STATE OF CALIFORNIA
County of Riverside

Proof of Publication of

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of a printer of the, DESERT SUN PUBLISHING COMPANY a newspaper of general circulation, printed and published in the city of Palm Springs, County of Riverside, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Riverside, State of California under the date of March 24, 1988. Case Number 191236; that the notice, of which the annexed is a printed copy (set in type not smaller than non pariel, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

January 9th, 16th, 2010

All in the year 2010

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Palm Springs, California this ---18th, ---- day

of---------- January ----------, 2010

Signature

No 0109

California Public Utilities Commission
Notice of Availability of a Draft Environmental Impact Report (EIR) and Public Meeting for the Devers-Mirage 115 kV Subtransmission System Split Project

Notice is hereby given that the California Public Utilities Commission (CPUC) has released a Notice of Availability (NOA) of a Draft Environmental Impact Report (EIR) for the Devers-Mirage 115 kV Subtransmission System Split Project. The EIR addresses site-specific impacts of the construction, operation, and maintenance of the Proposed Project. The EIR also discusses and analyzes alternatives to the Proposed Project. The Draft EIR is available for review during the 45-day review period that is now open until 5:00 p.m. on February 22, 2010. The Draft EIR is available for public review on the project website at http://www.cpuc.ca.gov/Environment/info/esa/devers-mirage/devers.html. The website includes further information on the environmental review process for this project, including copies of related public documents, project history, and announcements of all upcoming public meetings. A copy of the Draft EIR may be requested by telephone at (707) 795-0940 or by email at devers-mirage@esassoc.com. Comments may be submitted in writing to: Mr. Eric Chiang, Devers-Mirage 115 kV Subtransmission System Split Project, C/O ESA, 1425 N. McDowell Boulevard, Suite 200, Petaluma, CA 94954, by fax to (707) 795-0902, or by email to devers-mirage@esassoc.com.

Additionally, the CPUC will hold a public information meeting to receive oral and written comments from interested parties on **Friday, January 29th at the California State University, San Bernardino Palm Desert Campus, Mary Stuart Rogers Gateway Building (Classroom RG-303), 37-500 Cook Street (b/w Gerald Ford Dr. and Frank Sinatra Dr., Palm Desert, California between 6:30 p.m.** and 8:30 p.m. Following the end of the public comment period, responses to all comments received on the Draft EIR and submitted within the specified 45-day review period will be prepared by the CPUC and included in a response to comments document, which together with the Draft EIR, will constitute the Final EIR for the Proposed Project.

Published: 1/9, 1/16/10

PROOF OF PUBLICATION
(2015.5.C.C.P)

This is space for County Clerk's Filing Stamp

STATE OF CALIFORNIA
County of Riverside

Proof of Publication of

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of a printer of the, DESERT SUN PUBLISHING COMPANY a newspaper of general circulation, printed and published in the city of Palm Springs, County of Riverside, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Riverside, State of California under the date of March 24, 1988. Case Number 191236; that the notice, of which the annexed is a printed copy (set in type not smaller than non pariel, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

January 9th, 16th, 2010

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I certify (or declare) under penalty of perjury that the foregoing is true and correct.

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Additionally, the CPUC will hold a public information meeting to receive oral and written comments from interested parties on **Friday, January 29th at the California State University, San Bernardino Palm Desert Campus, Mary Stuart Rogers Gateway Building (Classroom RG-303), 37-500 Cook Street (b/w Gerald Ford Dr. and Frank Sinatra Dr., Palm Desert, California between 6:30 p.m.** and 8:30 p.m. Following the end of the public comment period, responses to all comments received on the Draft EIR and submitted within the specified 45-day review period will be prepared by the CPUC and included in a response to comments document, which together with the Draft EIR, will constitute the Final EIR for the Proposed Project.

Published: 1/9, 1/16/10

APPENDIX C
CPUC Project Website

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STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION

SCE Devers-Mirage 115 kV Subtransmission System Split Project

(Application A.08-01-029, filed January 31, 2008)

Draft Environmental Impact Report

Files linked on this page are in Portable Document Format (PDF). To view them, you will need to download the free Adobe Acrobat Reader if it is not already installed on your PC.
Note: For best results in displaying the largest files (see sizes shown in parentheses below for files larger than 3.0 MB), right-click the file's link, click "Save Target As" to download the file to a folder on your hard drive, then browse to that folder and double-click the downloaded file to open it in Acrobat.

Complete DEIR [pdf 57.3mb]

COVER, NOTICE of AVAILABILITY (NOA), and TABLE of CONTENTS [pdf]

EXECUTIVE SUMMARY [pdf]

1. **INTRODUCTION** [pdf]

2. **PROJECT DESCRIPTION** [pdf]

3. **ALTERNATIVES and CUMULATIVE PROJECTS** [pdf]

4. **ENVIRONMENTAL ANALYSIS**
   - 4.0 Introduction [pdf]
   - 4.1 Aesthetics [pdf 34.7mb]
   - 4.2 Agricultural Resources [pdf]
   - 4.3 Air Quality [pdf]
   - 4.4 Biological Resources [pdf]
   - 4.5 Cultural Resources [pdf]
   - 4.6 Geology and Soils [pdf]
   - 4.7 Hazards and Hazardous Materials [pdf]
   - 4.8 Hydrology and Water Quality [pdf]
   - 4.9 Land Use, Planning, and Policies [pdf]
   - 4.10 Mineral Resources [pdf]
   - 4.11 Noise [pdf]
   - 4.12 Population and Housing [pdf]
   - 4.13 Public Services [pdf]
   - 4.14 Recreation [pdf]
   - 4.15 Transportation and Traffic [pdf]
   - 4.16 Utilities and Service Systems [pdf]

5. **COMPARISON of ALTERNATIVES** [pdf]

6. **CEQA STATUTORY SECTIONS** [pdf]

7. **REPORT PREPARERS** [pdf]

8. **MITIGATION MONITORING, REPORTING, and COMPLIANCE PROGRAM (MMRCP)** [pdf]

APPENDICIES

A. **Scoping Report** [pdf 7.13mb]

B. **Electric and Magnetic Fields** [pdf 3.34mb]

C. **Air Quality** [pdf]

D. **Certificate of Service and Mailing List** [pdf]

WEBSITE INFO
This page contains tables and is best viewed with Firefox or Internet Explorer.
Please report any problems to the Energy Division web coordinator.

Project Home Page - CPUC Environmental Information - CPUC Home - Top

APPENDIX D
Public Meeting Presentation

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Southern California Edison Company Devers-Mirage 115 kV Subtransmission System Split Project

California Public Utilities Commission
Public Comment Meeting
for the
Draft Environmental Impact Report (DEIR)

January 29, 2010
Palm Desert, California

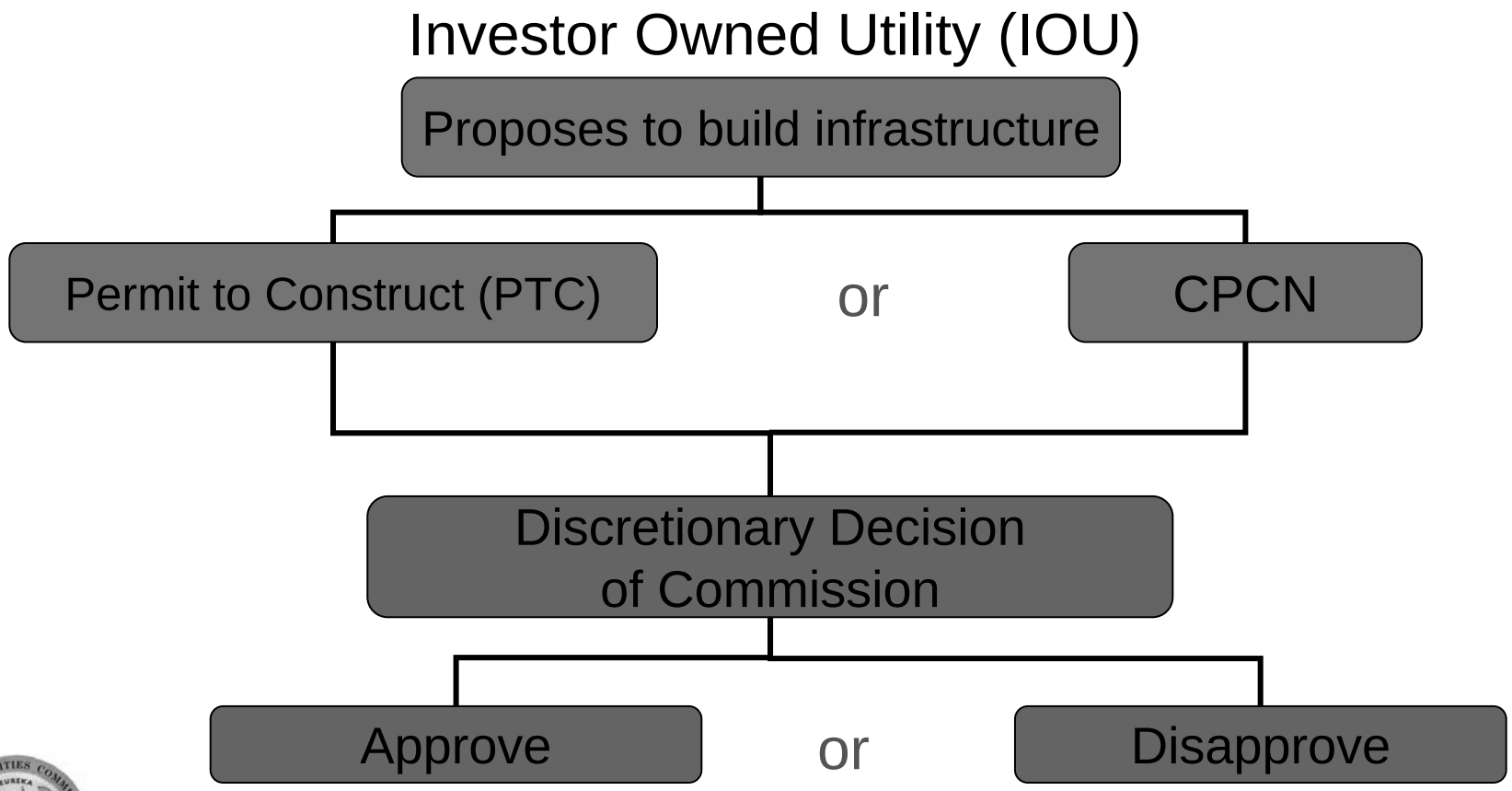
Participants and their Roles

- Eric Chiang, CPUC
  - Lead Agency under the California Environmental Quality Act (CEQA)
- Doug Cover and Matt Fagundes, Environmental Science Associates (ESA)
  - Environmental Consultant for the CPUC
- Southern California Edison: Applicant

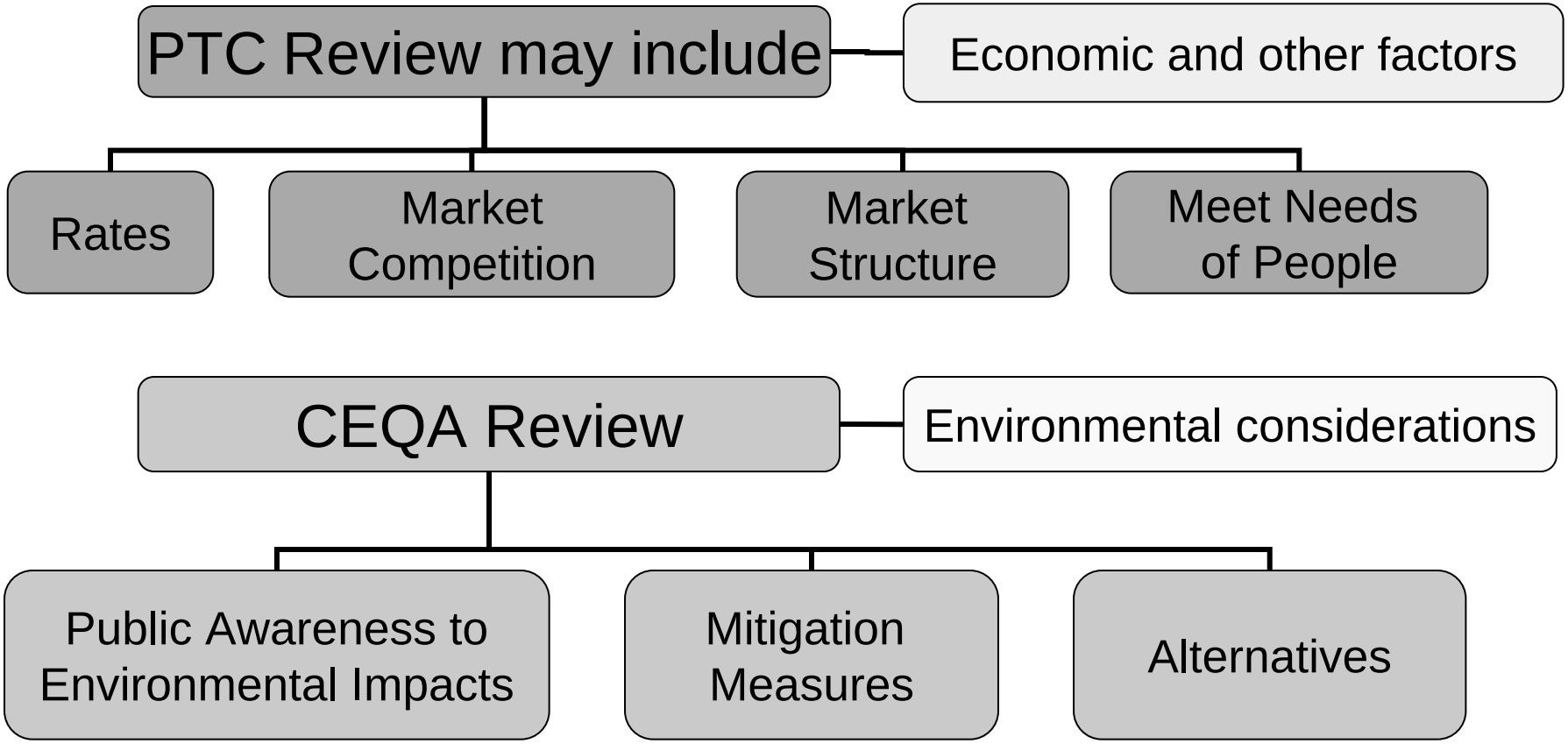
Meeting Agenda

- CPUC Review and CEQA Process
- Project Overview
- Alternatives Considered
- Summary of Environmental Impacts
- Next Steps
- Public Comment
  - Speaker cards
  - Comment forms

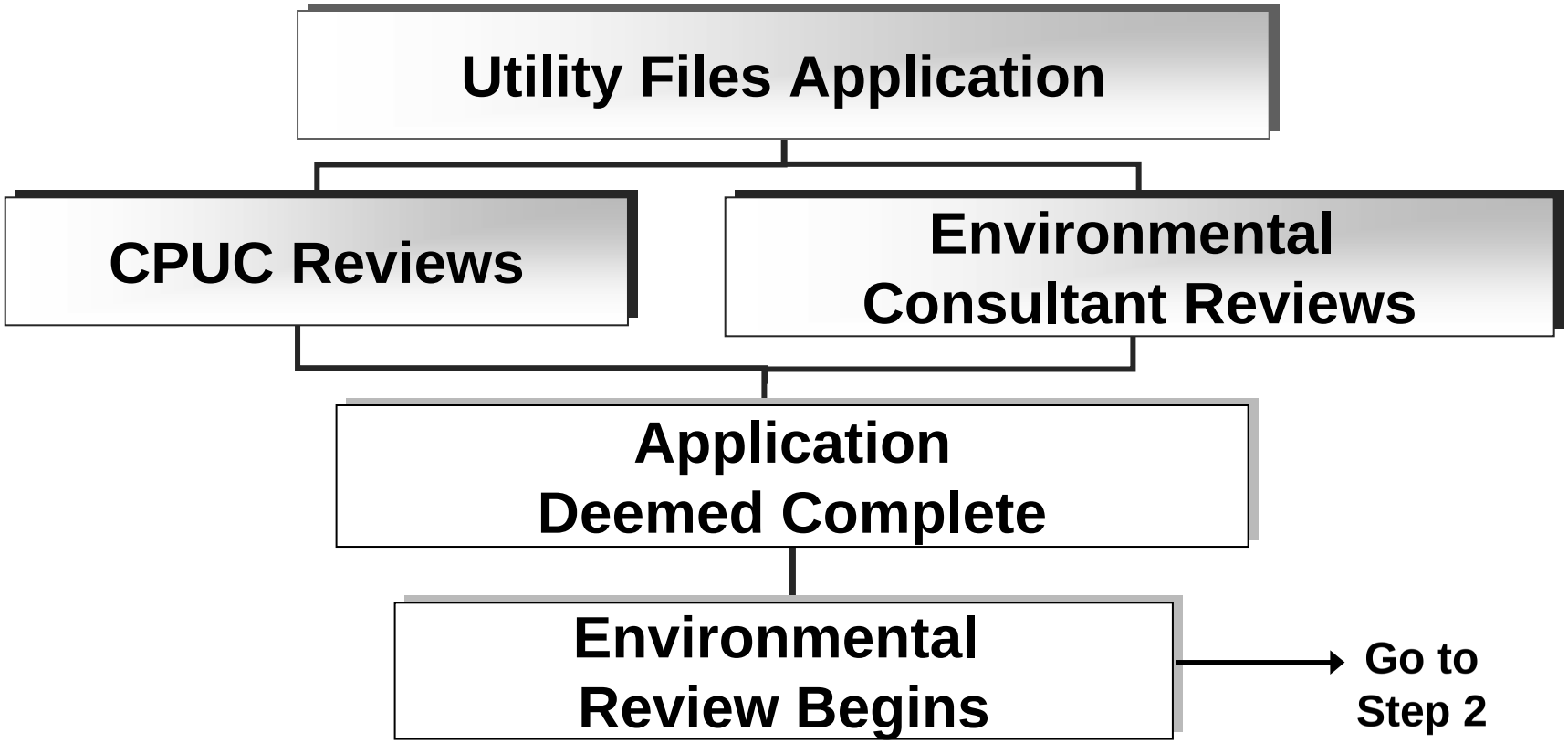
Permit to Construct (PTC)



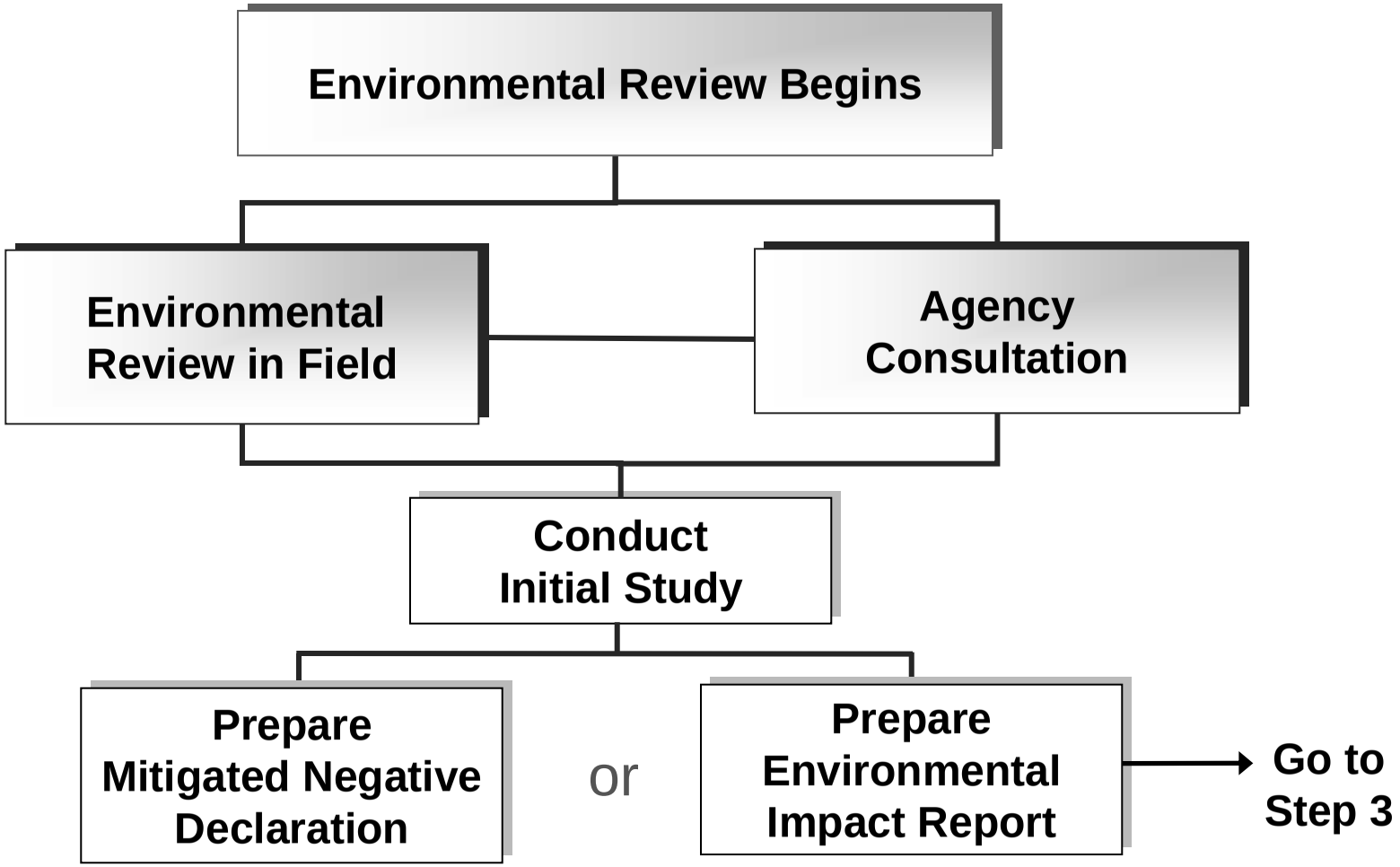
CPUC Review Process



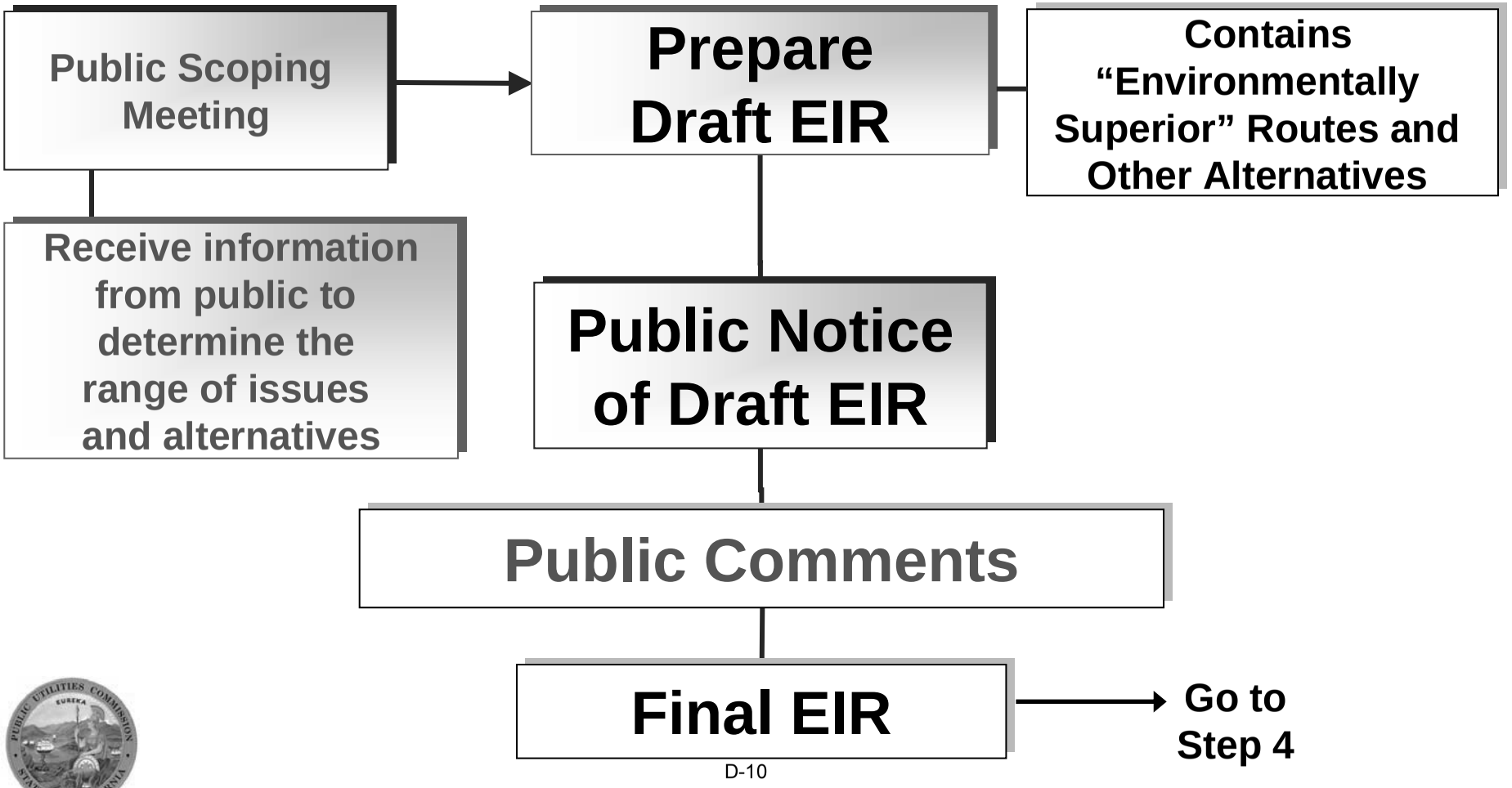
Basic Application and Environmental Review Processes (Step 1)



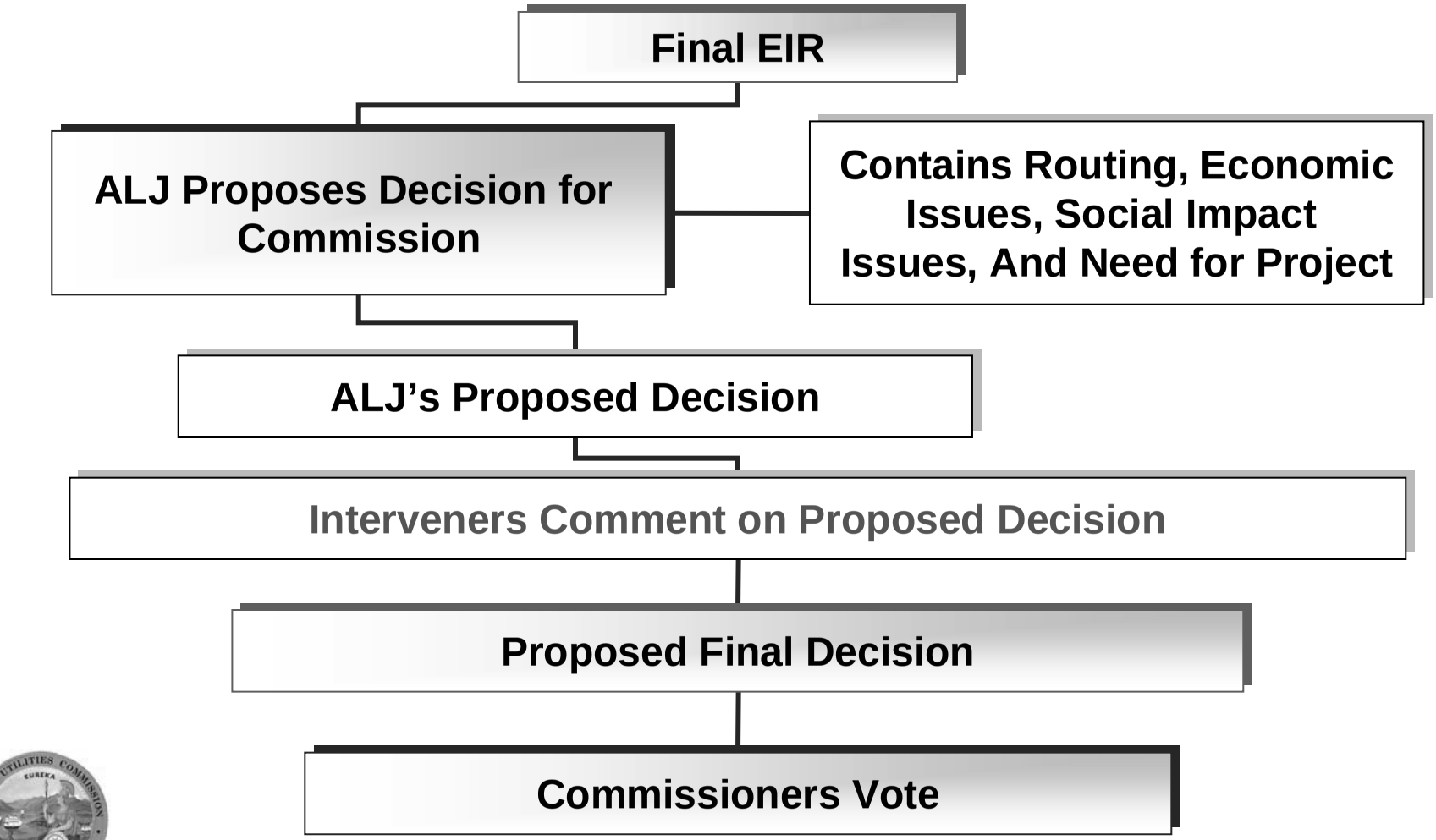
Basic Application and Environmental Review Processes (Step 2)



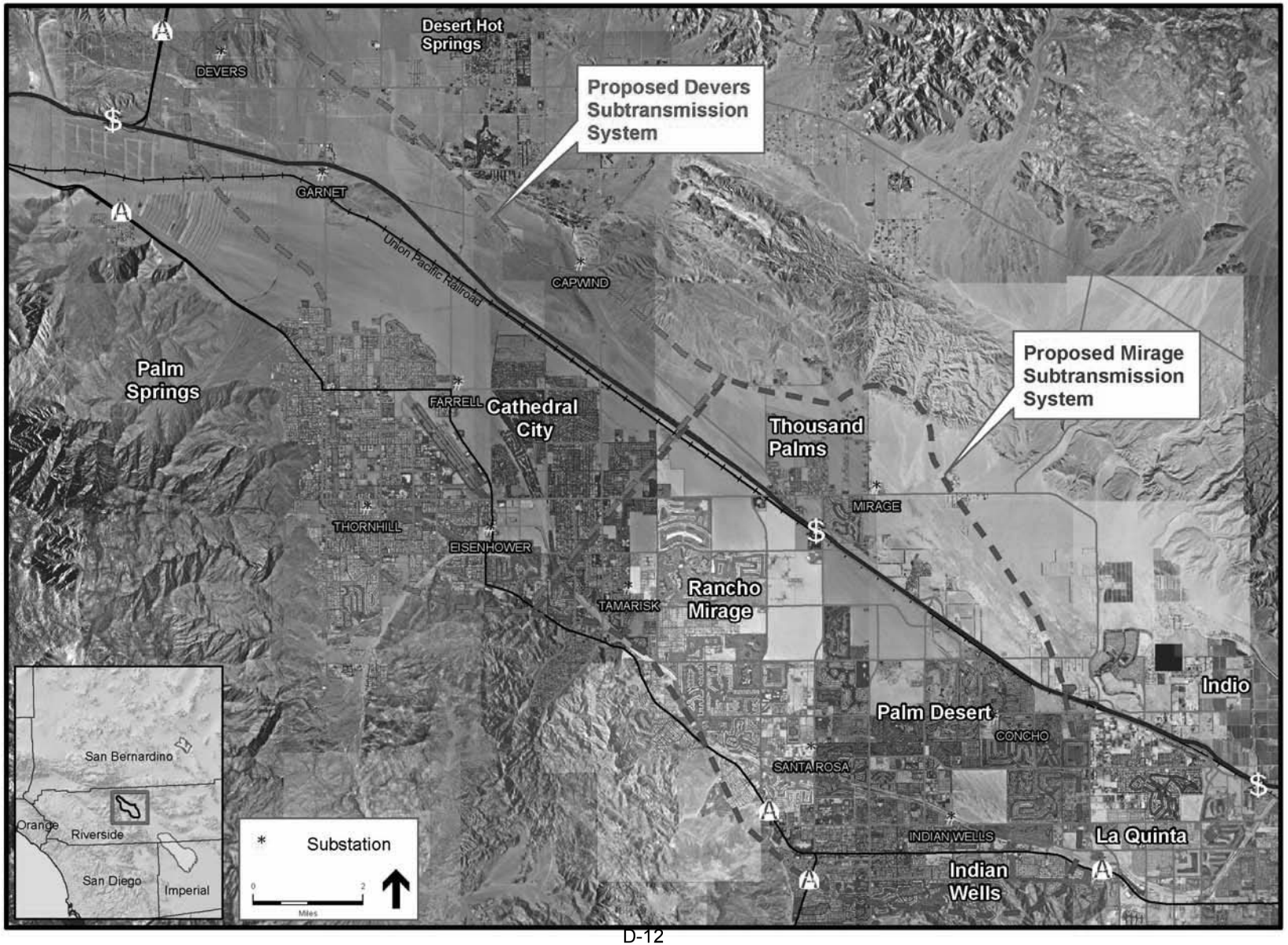
Basic Application and Environmental Review Processes (Step 3)



Basic Application and Environmental Review Processes (Step 4)



Project Location



SCE's Project Purpose and Need

- Relieve existing thermal overload conditions on two 115 kV subtransmission lines
- Resolve a forecasted voltage problem on the 220 kV transmission system
- Serve projected electrical demand in the cities of Palm Springs, Rancho Mirage, Cathedral City, Palm Desert, Indian Wells, and unincorporated areas of Riverside County, including the Thousand Palms community
- Be operational by mid-2011

Project Description Overview

- Farrell-Garnet 115 kV Proposed Route
- Mirage-Santa Rosa 115 kV Proposed Route
- Devers-Coachella Valley 220 kV Loop-In
- 115 kV Line Reconfigurations
- Substations

Project Description

- **Farrell-Garnet 115 kV Proposed Route**
  - Replace approximately 5.3 miles of existing single-circuit lines and structures with double-circuit
  - Within existing SCE right-of-ways (ROWs), public ROWs, and private property
  - General alignment:
    - From Farrell Sub north along the east side of Gene Autry Trail to a point south of the RR
    - Cross to west of Gene Autry Trail
    - Cross the RR, proceed in a new 0.8-mile SCE ROW to a location south of the I-10 ROW
    - Continue NW and W along I-10 to Garnet Substation

Project Description (cont'd)

- **Mirage-Santa Rosa 115 kV Proposed Route**
  - Replace approximately 1.5 miles of existing single-circuit lines and structures with double-circuit
  - Within existing SCE and public road ROWs
  - General alignment:
    - From Mirage Sub south adjacent to the east side of Tri-Palm Estates
    - Through the Tri-Palm Estates golf course
    - South of the golf course, cross I-10 to join the existing subtransmission system

Project Description (cont'd)

- **Devers-Coachella Valley 220 kV Loop-In**
  - Loop existing Devers-Coachella 220 kV line to Mirage Substation
  - From Devers-Coachella ROW, south approximately 0.8 mile on double-circuit lattice steel towers to Mirage Substation
- **115 kV Line Reconfigurations**
  - Line reconfigurations at three intersections:
    - Portola Avenue and Gerald Ford Drive
    - Dinah Shore Drive and Bob Hope Drive
    - near Varner Road and Date Palm Drive

Project Description (cont'd)

- **Substations**
  - Installation of additional equipment and relays at Mirage, Concho, Indian Wells, Santa Rosa, Eisenhower, Farrell, Garnet, Thornhill, and Tamarisk Substations

Alternative Alignments

- Alternative 2
  - Underground single-circuit along Gene Autry Trail, Vista Chino Rd, and Sunrise Way to Four Seasons Blvd
  - Overhead from Four Seasons Blvd north to the Proposed Route and on to Garnet Sub
  - 3.0 miles underground; 3.0 miles overhead

Alternative Alignments (cont'd)

- Alternative 3
  - Underground single-circuit along Gene Autry Trail, Vista Chino Rd, Sunrise Way, San Rafael Rd, and 50 feet of Indian Canyon Dr
  - From riser pole, north along Indian Canyon Drive to Garnet Sub
  - 3.6 miles underground; 2.9 miles overhead
- Alternative 5
  - Underground in Ramon Road to Monterey Ave south to Varner Rd
  - Transition to overhead before crossing I-10
  - 1.9 miles underground; 500 feet overhead

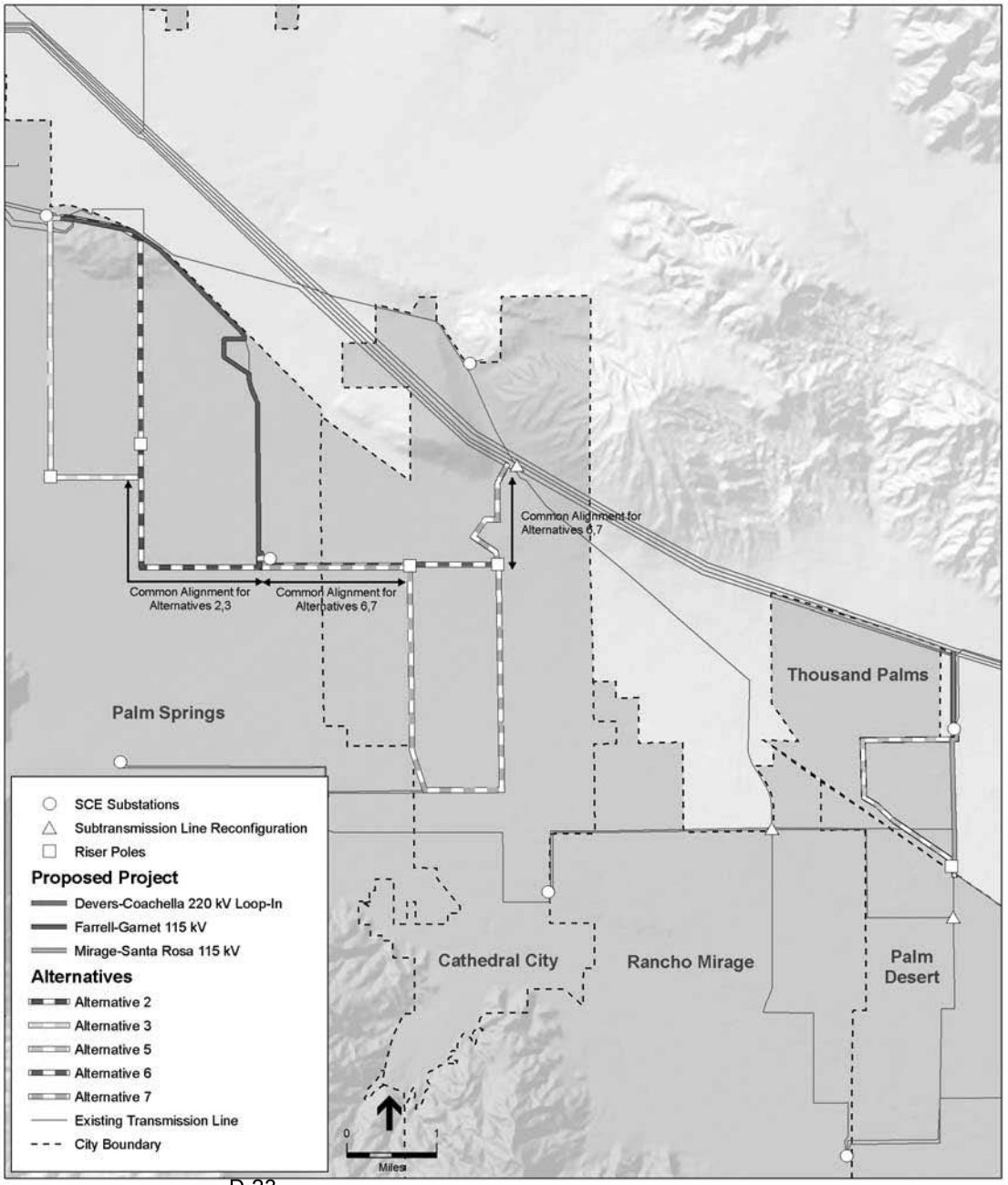
Alternative Alignments (cont'd)

- Alternative 6
  - Overhead line along Gene Autry Trail and Vista Chino to Landau Boulevard
  - Underground line along Vista Chino from Landau Boulevard to Date Palm Drive
  - Overhead line from Landau Boulevard along Date Palm Drive and existing SCE ROW to the existing Devers-Eisenhower ROW
  - 1.0 mile underground; 3.2 miles overhead

Alternative Alignments (cont'd)

- Alternative 7
  - Overhead line along Gene Autry Trail, Vista Chino, Landau Boulevard, 33rd Street, Date Palm Drive, and existing SCE ROW to the existing Devers-Eisenhower ROW
  - 9.1 miles overhead

Alternative Alignments



Summary of Impacts

- No or Less than Significant Impacts:
  - Agricultural Resources; Geology and Soils; Mineral Resources; Population and Housing; Recreation; Utilities and Service Systems
- Impacts Less than Significant with Mitigation:
  - Aesthetics; Biological Resources; Cultural Resources; Hazards/Hazardous Materials; Hydrology/Water Quality; Land Use; Noise; Public Services; and Traffic and Transportation
- Significant Unmitigable Impacts:
  - Air Quality (temporary during construction)

Environmentally Superior Alternative – Farrell-Garnet Study Area

- Alternative 3
  - Least overall long-term impacts to Aesthetics and Biological Resources due to underground line
  - Most overall short-term impacts to Traffic and Transportation due to construction of the underground line
  - Significant unavoidable short-term impacts to Air Quality
- Alternative 7
  - Least overall impacts to Cultural Resources
  - Significant unavoidable short-term impacts to Air Quality
- Proposed Project
  - Least overall short-term impacts to Transportation and Traffic due to overhead route and overall route length
  - Significant unavoidable short-term impacts to Air Quality
- **Conclusion:** Alternative 3
  - CPUC Statement of Overriding Consideration

Environmentally Superior Alternative – Mirage-Santa Rosa Study Area

- Alternative 5
  - Least overall long-term impacts to Aesthetics and Biological Resources due to underground line
  - Most overall short-term impacts to Traffic and Transportation due to construction of the underground line
  - Significant unavoidable short-term impacts to Air Quality
- Proposed Project
  - Least overall short-term impacts to Transportation and Traffic due to overhead route
  - Significant unavoidable short-term impacts to Air Quality
- **Conclusion:** Alternative 5
  - CPUC Statement of Overriding Consideration

Next Steps

- Notice of Availability was circulated to solicit input from agencies and the public
- This meeting is part of the comment process
- Comments will be considered and addressed in a Final EIR
- CPUC considers EIR / other factors and issues a draft decision for the Proposed Project
- CPUC considers comments on draft and alternate decisions and votes on the Project

How to Comment

- Please submit comments no later than Monday, February 22, 2010:

Mr. Eric Chiang

Devers-Mirage 115kV Subtransmission System Split Project

c/o Environmental Science Associates

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Fax: (707) 795-0902

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Website: http://www.cpuc.ca.gov/Environment/info/esa/devers-mirage/devers.html

Public Comment

Public Comment Guidelines

- One person to speak at a time
- Be concise
- Stay on topic
- Support everyone's participation
- Respect others' opinions
- Written comments are encouraged

APPENDIX E

Mitigation Monitoring, Reporting, and Compliance Program

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM

SOUTHERN CALIFORNIA EDISON'S
DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT
(APPLICATION NO. A.08-01-029)

Introduction

This document describes the mitigation monitoring, reporting, and compliance program (MMRCP) for ensuring the effective implementation of the mitigation measures required for the California Public Utilities Commission (CPUC, or Commission) approval of Southern California Edison's (SCE) application to construct, operate, and maintain the Proposed Project. All mitigations are presented in Table 8-1 provided at the end of this MMRCP.

If the Proposed Project is approved, this MMRCP would serve as a self-contained general reference for the Mitigation Monitoring Program adopted by the Commission for the project. If and when the Proposed Project has been approved by the Commission, the CPUC will compile the Final Plan from the Mitigation Monitoring Program in the Final Environmental Impact Report (EIR), as adopted.

California Public Utilities Commission – MMRCP Authority

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval be implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a MMRCP when it approves a project that is subject to preparation of an EIR and where the EIR for the project identifies potentially significant environmental effects. California Environmental Quality Act (CEQA) Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring and reporting.

The purpose of a MMRCP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMRCP as a working guide to

facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

The Commission will address its responsibility under Public Resources Code Section 21081.6 when it takes action on SCE's applications. If the Commission approves the applications, it will also adopt a Mitigation Monitoring, Compliance, and Reporting Program that includes the mitigation measures ultimately made a condition of approval by the Commission.

Because the CPUC must decide whether or not to approve the SCE application and because the application may cause either direct or reasonably foreseeable indirect effects on the environment, CEQA requires the CPUC to consider the potential environmental impacts that could occur as the result of its decisions and to consider mitigation for any identified significant environmental impacts.

If the CPUC approves SCE's application for authority to construct and operate the subtransmission and transmission lines and to modify its substations, SCE would be responsible for implementation of any mitigation measures governing both construction and future operation of the subtransmission and transmission lines and substations. Though other State and local agencies would have permit and approval authority over construction of the subtransmission and transmission lines, the CPUC would continue to act as the lead agency for monitoring compliance with all mitigation measures required by this EIR. All approvals and permits obtained by SCE would be submitted to the CPUC for mitigation compliance prior to commencing the activity for which the permits and approvals were obtained.

In accordance with CEQA, the CPUC reviewed the impacts that would result from approval of the application. The activities considered include the construction of the upgraded and new subtransmission and transmission lines and modification of the Devers, Mirage, Santa Rosa, Eisenhower, Farrell, Garnet, Thornhill, Tamarisk, Concho, and Indian Wells substations, and modifications to the Edom Hill Communication Site and Palm Springs Service Center, and the future operation of these facilities. The CPUC review concluded that implementation of the Proposed Project could result in temporary significant unmitigable impacts to air quality during construction activities. All other potential impacts could be mitigated to less than significant levels. The CPUC has included the stipulated mitigation measures as conditions of approval of the applications and has circulated a Draft EIR.

The attached EIR presents and analyzes potential environmental impacts that would result from construction, operation, and maintenance of the new subtransmission and transmission lines and other facility modifications, and proposes mitigation measures, as appropriate. Based on the EIR, approval of the application would have no impact or less than significant impacts in the following areas:

- Agricultural Resources
- Geology and Soils
- Mineral Resources
- Population and Housing
- Recreation
- Utilities and Service Systems

The EIR indicates that approval of the application would result in potentially significant impacts that would be mitigated to less than significant in the areas of:

- Aesthetics
- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use, Planning and Policies
- Noise
- Public Services
- Transportation and Traffic

The EIR indicates that approval of the application would result in significant and unmitigable impacts in the in the area of:

- Air Quality

Roles and Responsibilities

As the lead agency under CEQA, the CPUC is required to monitor this project to ensure that the required mitigation measures and any Applicant Proposed Measures are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this MMRCP and has primary responsibility for implementation of the monitoring program. The purpose of the monitoring program is to document that the mitigation measures required by the CPUC are implemented and that mitigated environmental impacts are reduced to the level identified in the Program. The CPUC has the authority to halt any activity associated with the Proposed Project if the activity is determined to be a deviation from the approved project or the adopted mitigation measures.

The CPUC may delegate duties and responsibilities for monitoring to other mitigation monitors or consultants as deemed necessary. The CPUC will ensure that the person(s) delegated any duties or responsibilities are qualified to monitor compliance.

The CPUC, along with its mitigation monitor, will ensure that any variance process, which will be designed specifically for the Proposed Project, or deviation from the procedures identified under the monitoring program, is consistent with CEQA requirements; no project variance will be approved by the CPUC if it creates new significant environmental impacts. As defined in this MMRCP, a variance should be strictly limited to minor project changes that will not trigger other permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. A Proposed Project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project and adopted mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC and the mitigation monitor assigned to the construction for their review and approval. In some cases, a variance may also require approval by a CEQA responsible agency.

Enforcement and Responsibility

The CPUC is responsible for enforcing the procedures for monitoring through the environmental monitor. The environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the CPUC. The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the project if the activity is determined to be a deviation from the approved project or adopted mitigation measures. The CPUC may assign its authority to their environmental monitor.

Mitigation Compliance Responsibility

SCE is responsible for successfully implementing all the adopted mitigation measures in this MMRCP. The MMRCP contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

SCE shall inform the CPUC and its mitigation monitor in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC in coordination with its mitigation monitor will assess whether alternative mitigation is appropriate and specify to SCE the subsequent actions required.

Dispute Resolution Process

This MMRCP is expected to reduce or eliminate many of the potential disputes concerning the implementation of the adopted measures. However, in the event that a dispute occurs, the following procedure will be observed:

- **Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC's designated Project Manager for resolution. The Project Manager will attempt to resolve the dispute.

- **Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the Proposed Project or adopted Mitigation Monitoring Program.

- **Step 3**. If a dispute or complaint regarding the implementation or evaluation of the MMRCP or the mitigation measures cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.

- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

Parties may also seek review by the Commission through existing procedures specified in the Commission's Rules of Practice and Procedure for formal and expedited relief.

General Monitoring Procedures

Mitigation Monitor

Many of the monitoring procedures will be conducted during the construction phase of the project. The CPUC and the mitigation monitor are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with SCE. To oversee the monitoring procedures and to ensure success, the mitigation monitor assigned to the construction must be on site during that portion of construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The mitigation monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures included in the MMRCP, will be taken:

- Procedures to be followed by construction companies hired to do the work will be written into contracts between SCE and any construction contractors. Procedures to be followed by construction crews will be written into a separate agreement that all construction personnel will be asked to sign, denoting agreement.

- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the MMRCP.

- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all mitigation measures requiring their attention.

General Reporting Procedures

Site visits and specified monitoring procedures performed by other individuals will be reported to the mitigation monitor assigned to the construction. A monitoring record form will be submitted to the mitigation monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the mitigation monitor. A checklist will be developed and maintained by the mitigation monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The mitigation monitor will note any problems that may occur and take appropriate action to rectify the problems. SCE shall provide the CPUC with written quarterly reports of the project, which

shall include progress of construction, resulting impacts, mitigation implemented, and all other noteworthy elements of the project. Quarterly reports shall be required as long as mitigation measures are applicable.

Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the CPUC on request. The CPUC and SCE will develop a filing and tracking system.

Condition Effectiveness Review

In order to fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a MMRCP to ensure compliance during project implementation (CEQA 21081.6):

- The CPUC may conduct a comprehensive review of conditions which are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined above; and

- If in either review, the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, or that recent proven technological advances could provide more effective mitigation, then the CPUC may impose additional reasonable conditions to effectively mitigate these impacts.

These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

Mitigation Monitoring, Reporting and Compliance Program

The table attached to this program presents a compilation of applicant proposed measures (APMs) and the mitigation measures in the EIR. The purpose of the table is to provide a single comprehensive list of impacts, mitigation measures, monitoring and reporting requirements, and timing.

SCE proposed APMs to minimize impacts to the following resource areas: air quality; biological resources; cultural resources (including paleontological resources); geology and soils; hazards and hazardous materials; hydrology and water quality; land use, planning, and policies; noise; traffic and transportation; and utilities and service systems. The impact analysis presented in this EIR assumes that these APMs would be implemented as part of the Proposed Project; therefore, implementation of these measures is required to ensure that impacts from the Proposed Project are mitigated to the maximum extent feasible. Furthermore, in cases where APMs would not fully mitigate impacts, mitigation measures were added that would either strengthen or supersede the applicable APM in order to further reduce impacts. As such, all APMs that are not superseded are included in the Mitigation Monitoring, Reporting, and Compliance Program.

TABLE 8-1
MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Aesthetics				
Impact 4.1-3: Pulling/splicing sites during the construction period could result in temporary adverse impacts to visual quality. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.1-3:** SCE shall not place equipment on the pulling/splicing sites any sooner than two weeks prior to the required use. After each pulling/splicing site is no longer being used, SCE and/or its contractor shall clean up the site and restore in accordance with the SWPPP Plan.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
Impact 4.1-6: If night lighting is required during construction, the Proposed Project could adversely affect nighttime views in the project area. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.1-6: Reduce construction night lighting impacts.** SCE shall design and install all lighting at project facilities, including construction and storage yards and staging areas, such that light bulbs and reflectors are not visible from public viewing areas, lighting does not cause reflected glare, and illumination of the project facilities, vicinity, and nighttime sky is minimized. SCE shall submit a Construction Lighting Mitigation Plan to the CPUC for review and approval at least ~~90~~ 30 days prior to the start of nighttime construction or the ordering of any exterior lighting fixtures or components, whichever comes first. SCE shall not order any exterior lighting fixtures or components until the *Construction Lighting Mitigation Plan* is approved by the CPUC. The Plan shall include but is not limited to the following measures: • Lighting shall be designed so exterior lighting is hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the project boundary. • All lighting shall be of minimum necessary brightness consistent with worker safety. • High illumination areas not occupied on a continuous basis shall have switches or motion detectors to light the area only when occupied.	SCE and its contractors to implement measure as defined.	SCE to submit Construction Lighting Mitigation Plan to CPUC for review. CPUC mitigation monitor to monitor compliance at least once per week.	Submit plan to CPUC at least 90 days prior to start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. During all phases of construction that include nighttime construction activities.
Impact 4.1-7: The Proposed Project transmission lines could create new sources of glare. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.1-7:** Non-specular conductors shall be installed to reduce the potential glare effects and the level of visual contrast between the subtransmission and transmission line and the landscape setting.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance.	Immediately following installation of conductors.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Impact 4.1-8: The Proposed Project substation modifications could create new sources of glare. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.1-8:** ~~A non-reflective or weathered finish shall be applied to all~~ All new structures and equipment installed at the Devers, Mirage, Concho, Indian Wells, Santa Rosa, Eisenhower, Farrell, Garnet, Thornhill, and Tamarisk Substations shall have non-specular (reduced glare) surface finishes, except for structures or equipment for which such finishes are not commercially available ~~to reduce potential glare effects~~.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to inspect compliance.	Immediately following installation of new structures and equipment at Project substations.
Agricultural Resources				
No APMs or mitigation required.				
Air Quality				
Impact 4.3-1: Construction activities would generate emissions of criteria pollutants, including suspended and inhalable particulate matter and equipment exhaust emissions. *Significant unmitigable* (Class I)	**APM AQ-1.** Control Exhaust Emissions. Use ultra-low sulfur diesel fuel (e.g., fewer than 15 parts per million).	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	APM AQ-2. Control Exhaust Emissions. Use of clean-burning on- and off-road diesel engines. Where feasible, heavy duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines) will be utilized.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	APM AQ-3. Control Exhaust Emissions. Construction workers will carpool when possible.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	APM AQ-4. Control Exhaust Emissions. Restrict vehicle idling time to less than 10 minutes whenever possible.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	APM AQ-5. Control Exhaust Emissions. Properly maintain mechanical equipment.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	APM AQ-6. Minimize Diesel Particulate Matter. Use particle traps and other appropriate controls to reduce diesel particulate matter (DPM) where possible. Utilize equipment such as specialized catalytic converters (oxidation catalysts) to control approximately 20 percent of DPM, 40 percent of CO, and 50 percent of hydrocarbon emissions.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	APM AQ-8. Construction Operations. As feasible, restrict construction operations during the morning hours and during high wind events, when NOx emissions are more likely to contribute to O3 formation.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	APM AQ-9. Construction Scheduling. Efficiently schedule staff and daily construction activities to minimize the use of unnecessary/duplicate equipment when possible.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	APM AQ-10. Emissions Reduction. To reduce simultaneous project-related NOx, PM10, and PM2.5, emissions from on- and off-road heavy construction equipment, given the constraints of the construction schedule, SCE shall phase project construction, to the extent feasible, so that off-site disposal of excavated material from Proposed Project area grading and excavation does not occur simultaneously with transmission and subtransmission line and substation construction or upgrade activity (including, but not limited to, access road grading, excavation for tower and pole bases, crane pads, tower and pole delivery, or tower and pole erection). During transmission and subtransmission line construction, SCE shall phase the project construction schedule, to the extent feasible, so that grading and excavation for site access, tower and pole bases, or crane pads do not occur simultaneously with tower or pole delivery or erection.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	Mitigation Measure 4.3-1a: Fugitive Dust Control Plan. SCE or its construction contractor shall prepare a fugitive dust control plan prior to conducting active construction activities. The plan shall include, at a minimum, the following fugitive dust control measures, which are based on Best Available Control Measures as outlined in the Coachella Valley Fugitive Dust Control Handbook. • *Backfilling*. Stabilize backfill material when not actively handling, during handling and at completion of activities. This may be achieved by mixing backfill soil with water prior to moving, dedicating a water truck or high capacity hose to backfilling equipment, emptying loader buckets slowly so that no dust plumes are generated and/or by the minimizing drop height from the loader bucket. • *Clearing and grubbing*. Maintain stability of soil through pre-watering of site prior to, during, and immediately after	SCE or its contractors to prepare plan and implement measure as defined.	SCE to submit plan to CPUC for review. CPUC mitigation monitor to monitor compliance with plan at least once per week.	Submit plan to CPUC prior to commencement of construction activities. During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	clearing and grubbing. This may be achieved by maintaining live perennial vegetation and desert pavement where possible and by applying water in sufficient quantities to prevent generation of dust plumes. • *Cut and fill*. Pre-water soils prior to and following cut and fill activities. This may be achieved by pre-watering with sprinklers or water trucks or by using water trucks/pulls to water soil to depth of cut prior to subsequent cuts. • *Demolition*. Stabilize wind erodible surfaces, surface soil where support equipment and vehicles operate, and loose soil and demolition debris. • *Disturbed soil.* Stabilize disturbed soil throughout the construction site and between structures. This may be achieved by limiting vehicular traffic and disturbances on soil where possible or by applying water or a stabilizing agent to prevent generation of visible dust plumes. • *Earth-moving activities.* Pre-apply water to depth of proposed cuts or as necessary to maintain soils in a damp condition. Stabilize soils once earth-moving activities are complete. This may be achieved by installing upwind fencing to prevent material movement, or applying water or a stabilizing agent to prevent generation of visible dust plumes. • *Importing/exporting of bulk materials.* Stabilize material while loading to prevent fugitive dust emissions, maintain at least six inches of freeboard on haul vehicles, limit vehicular speeds to 15 miles per hour while traveling onsite, stabilize material while transporting and/or unloading to prevent fugitive dust emissions, and comply with Vehicle Code Section 23114. This may be achieved by using tarps or other suitable enclosures on haul trucks, checking belly dump seals regularly and removing any trapped rocks to prevent spillage, complying with track-out prevention requirements and by providing water while loading and unloading to prevent visible dust plumes. • *Landscaping.* Stabilize soils, materials, and slopes by applying water to materials, maintaining materials in a crusted condition, maintaining an effective cover over materials, stabilizing sloping surfaces using soil binders, or by hydroseeding areas prior to the rainy season.			

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• *Staging areas.* Stabilize staging areas during use and at project completion. • *Stockpiles/bulk material handling.* Stabilize stockpiled materials or install and maintain wind barriers to less than 50 percent porosity on three sides of the pile, such that the barrier is equal to or greater than the pile height. Stockpiles within 100 yards of occupied buildings must not be greater than eight feet in height and stockpiles that are greater than eight feet in height and not covered must have a road bladed top to allow water truck access or must have an operational water irrigation system that is capable of complete stockpile coverage. • *Traffic areas for construction activities.* Stabilize all off-road traffic and parking areas and ensure that onsite vehicular traffic does not exceed 15 miles per hour. Stabilize all haul routes and direct construction traffic over established haul routes. This may be achieved by applying gravel or paving haul routes and by using barriers to ensure that construction traffic only uses established routes. • *Trenching.* Stabilize surface soils where trencher or excavator and support equipment will operate and stabilize soils at completion of trenching activities. Pre-water soils prior to trenching and wash mud and soils from equipment at the conclusion of trenching activities to prevent crusting and drying of soil on equipment. • *Unpaved roads/parking lots.* Stabilize soils to meet the applicable standards and limit vehicular travel to established paved roads (haul routes) and unpaved parking lots. • *Weather monitoring/work practices.* Monitor current weather conditions and weather predictions from the SCAQMD's toll free wind forecast system and/or the National Weather Service. Cease all construction activities if fugitive dust emissions exceed 20 percent opacity or if the 100 foot visible plume restrictions cannot be met.			
	Mitigation Measure 4.3-1b: Exhaust Emissions Control Plan. To ensure and monitor implementation of APMs AQ-1 through AQ-6 and AQ-8 through AQ-10, SCE shall develop an Exhaust Emissions Control Plan outlining how compliance with each of these measures shall be achieved. This plan shall be submitted to the	SCE and its contractors to implement measure as defined.	SCE to submit plan to CPUC for review. CPUC mitigation monitor to monitor compliance at least once per week.	Submit plan prior to commencement of construction activities. During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	CPUC for review and shall be distributed to all employees and construction contractors prior to commencement of construction activities. The CPUC construction monitor shall monitor compliance with the Plan periodically throughout the duration of construction activities.			
Impact 4.3-3: Construction activities would generate emissions of criteria pollutants that would be considered cumulatively considerable. *Significant unmitigable* (Class I)	Implement Mitigation Measures 4.3-1a (Fugitive Dust Control Plan) and 4.3-1b (Exhaust Emissions Control Plan).	See Mitigation Measures 4.3-1a and 4.3-1b.	See Mitigation Measures 4.3-1a and 4.3-1b.	See Mitigation Measures 4.3-1a and 4.3-1b.
Impact 4.3-4: Construction activities would generate emissions of criteria pollutants, exposing local sensitive receptors to pollutant concentrations. *Significant unmitigable* (Class I)	Implement Mitigation Measures 4.3-1a (Fugitive Dust Control Plan) and 4.3-1b (Exhaust Emissions Control Plan).	See Mitigation Measures 4.3-1a and 4.3-1b.	See Mitigation Measures 4.3-1a and 4.3-1b.	See Mitigation Measures 4.3-1a and 4.3-1b.
Impact 4.3-6: The Proposed Project would generate short-term and long-term emissions of GHGs that could exceed applicable thresholds of significance or conflict with applicable GHG reduction plans. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.3-6:** Within 60 days of completion of project construction, SCE shall enter into a binding agreement to purchase carbon offset credits from the California Climate Action Registry (CCAR), or any source that is approved by the CPUC and that is consistent with the policies and guidelines of the California Global Warming Solution Act of 2006 (AB 32), to offset a minimum of 30 percent of the net annualized increase of greenhouse gas emissions from the Proposed Project. The offsets identified in the binding agreement shall be implemented no later than six calendar months from completion of construction. The estimated amount of offsets required is 105.3 metric tons CO_2e per year (i.e., 30 percent of 148 metric tons CO_2e for years 1 through 5 and 30 percent of 392 metric tons of CO_2e for years 6 through 30). However, the exact amount of greenhouse gas emissions to be offset may vary depending on whether any of the construction plans are modified. Within 60 days of completion of the Proposed Project, SCE shall submit a report for the CPUC's review and approval, which shall identify all construction- and operations-related emissions and the offset amounts that will be purchased from approved programs to result in a minimum 30 percent net reduction in annualized GHG emissions.	SCE shall enter into a binding agreement to provide GHG emissions offsets as defined in this measure.	SCE to provide a report to the CPUC documenting the source and amount of emission offsets.	Provide report within 60 days following completion of construction; implement offsets within six calendar months following completion of construction.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources				
Impact 4.4-1: Construction activities could result in adverse impacts to Coachella Valley milkvetch. *Less than significant with mitigation* (Class II)	**APM BIO-1.** Preconstruction Surveys. Preconstruction biological clearance surveys will be performed to minimize impacts to special-status plant and wildlife.	SCE and its contractors to implement measure as defined.	SCE to submit preconstruction survey results to CPUC for review.	Prior to commencement of construction activities.
	APM BIO-2. Minimize Vegetation Impacts. Every effort will be made to minimize vegetation removal and permanent loss at construction sites. If necessary, native vegetation will be flagged for avoidance.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.
	APM BIO-5. Biological Monitors. Biological monitors will be assigned to the project in areas of sensitive biological resource. The monitors will be responsible for ensuring that impacts to special status species, native vegetation, wildlife habitat, or unique resources will be avoided to the fullest extent possible. Where appropriate, monitors will flag the boundaries of areas where activities need to be restricted in order to protect native plants and wildlife or special status species. Those restricted areas will be monitored to ensure their protection during construction.	SCE and its contractors to implement measure as defined.	SCE to provide resume of biological monitors to CPUC for review. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. During all phases of construction activities.
	APM BIO-6. Worker Environmental Awareness Program. A Worker Environmental Awareness Program (WEAP) will be prepared. All construction crews and contractors will be required to participate in WEAP training prior to starting work on the project. The WEAP training will include a review of the special status species and other sensitive resources that could exist in the project area, the locations of sensitive biological resources and their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. A record of all trained personnel will be maintained.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to attend first WEAP training session. SCE to submit records of trained personnel to CPUC.	Prior to commencement of construction activities.
	Mitigation Measure 4.4-1: Coachella Valley Milkvetch. Surveys for Coachella Valley milkvetch shall be performed within one year prior to construction, between February and early May, during the plant's growing and flowering season. GPS coordinates of plant locations shall be recorded with high precision (to within one meter), stored in an electronic database, and submitted to the USFWS and the CNDDB within one year of the survey. Plants shall be marked conspicuously with pin flags and avoided during construction to the greatest extent possible. Following the completion of construction, areas compacted during temporary construction activities	SCE and its contractors to implement measure as defined.	SCE to submit survey results to CPUC, USFWS, and CNDDB. SCE to submit documentation of restored habitat to CPUC for review. CPUC mitigation monitor to monitor compliance at least	Submit survey results within one year of completion of surveys. Prior to commencement of project operations. During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	(e.g., lay-down areas, pulling sites) shall be scarified, if deemed necessary, to enhance germination of this species. Temporary and permanent impacts to habitat for the CV milkvetch shall be compensated for through conservation of suitable habitat for this species. The calculated replacement for habitat loss for the CV milkvetch shall be based on a ratio of 3:1 (compensation to impact) per acre for temporary impacts and 9:1 for permanent impacts, for an estimated total of 6 acres. These ratios ~~Ratios~~ reflect the limited habitat and low populations of this species across its range, and the loss of habitat available for this species in the project area, and are consistent with compensation ratios established in the CVMSHCP. Greater or lesser compensation ratios may be substituted as determined though USFWS and CDFG consultation and/or permitting, considering the quality of the habitat being affected. The replacement habitat shall be within the Whitewater Floodplain Conservation Area of the CVMSHCP. Total compensation funds shall include the costs of acquisition and long-term management, and shall be paid prior to the start of project operations. This replacement habitat shall mitigate for both direct and indirect impacts of construction and operations/management on this species, as well as the CV fringe-toed lizard (see Mitigation Measure 4.4-2, below), Palm Springs pocket mouse, Palm Springs round-tailed ground squirrel, CV giant sand-treader cricket, and Le Conte's thrasher.		once per week.	
Impact 4.4-2: Construction activities could result in adverse impacts to Coachella Valley fringe-toed lizard and flat-tailed horned lizard. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.4-2: Coachella Valley fringe-toed lizard and flat-tailed horned lizard.** Construction work within Coachella Valley fringe-toed lizard habitat shall adhere to the following measures: • As determined at the time of construction, depending upon existing habitat conditions and the results of the protocol-level surveys for the CV fringe-toed lizard, a survey for this species according to the approved USFWS and CDFG Coachella Valley fringe-toed lizard survey protocol shall be conducted to determine presence or absence of Coachella Valley fringe-toed lizards, within 48 hours of erecting an Environmental Sensitive Area (ESA) exclusion fence.	SCE and its contractors to implement measure as defined.	SCE to submit findings of protocol-level surveys to CPUC. SCE to submit resume of qualified biologist to CPUC. SCE to submit vegetation plan as well as documentation of USFWS approval of plan to CPUC. SCE to submit documentation of replacement habitat to CPUC for review.	Prior to commencement of construction activities. Prior to commencement of project operations.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• ESA exclusion fences shall enclose all construction areas in fringe-toed lizard habitat. The location of these fences shall be based on existing conditions and the results of protocol-level surveys for this species, and a map indicating the proposed location of these fences shall be submitted to the USFWS for approval, prior to erecting them. At a minimum, ESA fences shall be erected along the proposed Farrell-Garnet alignment, on both sides of the Gene Autry Trail south of the UPRR. Fences shall be erected after one pre-construction survey (described in the previous bullet) is conducted, and shall be maintained to keep the Coachella Valley fringe-toed lizards from entering active work areas. Silt fencing shall be buried to a depth of eight to 12 inches. A second pre-construction survey within the ESA shall be conducted to remove any remaining fringe-toed lizards from the construction footprint. Generally, ESA fencing is anticipated to be erected along the Farrell-Garnet alignment. • SCE and/or its construction contractors shall retain and have available, the services of a ~~CPUC authorized~~ qualified biologist who shall perform the duties of the biological monitor. The biological monitor shall be required to conduct a pre-construction survey of the project site and any associated staging areas; provide employee WEAP training (see APM BIO-6 [Worker Environmental Awareness Program], above); monitor the temporary ESA fence installation; and perform construction monitoring. The construction monitor shall ensure that the contractor maintains the integrity of the biological fencing during the entire construction duration. The authorized biologist shall have previous experience handling fringe-toed lizards. The authorized biologist shall submit a protocol for capture and release of Coachella Valley fringe-toed lizards prior to initiating survey methods. Capture of Coachella Valley fringe-toed lizards and flat-tailed horned lizards shall be allowed by net, noose, or by hand. A new pair of latex or synthetic gloves shall be used for each lizard handled. • If any Coachella Valley fringe-toed lizards of flat-tailed horned lizards are captured, they shall be released immediately in a mapped area approved by the		CPUC mitigation monitor to monitor compliance at least once per week.	During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	USFWS prior to the pre-construction survey. The release area shall be searched for snakes, and if found, a different location shall be found. Lizards shall be released in the shade of a shrub. No lizards shall be in captivity or in transport for longer than 10 minutes after their initial capture within an enclosed construction area. Lizards shall be transported in clean, white, plastic five-gallon buckets. • All movement of construction vehicles outside of the ROW shall be restricted to pre-designated access or public roads. Access sites along Gene Autry Trail and in the Coachella Valley fringe-toed lizard critical habitat shall be designated on the ESA fencing map and approved by the USFWS, prior to construction. • If road stabilization is required for the temporary access roads, the materials used for stabilization shall consist of temporary, easily removable material (e.g. mats laid down on sand, rather than gravel). No gravel shall be dumped on the ROW in fringe-toed lizard habitat. • The real limits of construction within the ROW shall be predetermined, with activity restricted to and confined within those limits and placed on a map, submitted to the USFWS for their approval prior to construction. No paint or permanent discoloring agents shall be applied to rocks or vegetation to indicate survey or construction activity limits. • Construction and maintenance vehicles shall not exceed a speed of 10 miles per hour in Coachella Valley fringe-toed lizard habitat (on the access roads and road shoulders along the Gene Autry Trail roadway, and in designated Coachella Valley fringe-toed lizard critical habitat). • Construction operations within occupied Coachella Valley fringe-toed lizard habitat shall occur when this species is typically active, which is when the air temperatures one inch above the ground in the shade are between 96 degrees and 112 degrees Fahrenheit, preferably between April 1 and October 30, contingent upon activity being observed at a nearby reference			

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	population. Work may occur during the evening hours and outside the active season (when the temperatures are cooler and the electrical demand is lower), if the necessary clearance surveys are conducted during the appropriate temperatures, the silt fencing is maintained, and no Coachella Valley fringe-toed lizards have entered the project area. • Spoils shall be stockpiled in previously disturbed areas that have been examined for the presence of Coachella Valley fringe-toed lizards and flat-tailed horned lizards by the authorized biologist. Stockpile placement sites shall be mapped on the ESA fencing map and submitted to the USFWS for approval prior to beginning construction. • Existing sand-retaining lattice fences in the ROW shall be repaired or replaced. • At least one month prior to construction, a vegetation restoration plan shall be submitted to the USFWS for approval in the areas of occupied Coachella Valley fringe-toed lizard habitat (generally, on the east and west side of the Gene Autry roadway). Each plant that is destroyed due to construction in the ROW along the east and west side of Gene Autry Trail roadway shall be replaced and monitored for at least ~~ten~~ five years, or other period of time approved by the USFWS, to ensure at least 60 percent replacement of the impacted Coachella Valley fringe-toed lizard habitat. • Clearance surveys shall be repeated if more than 72 hours elapse between work sessions, if any portion of a fence is removed or blown down, or if measurable rainfall occurs. • Temporary and permanent impacts to CV fringe-toed lizard habitat shall be mitigated through conservation of suitable habitat for this species. The calculated replacement for habitat loss for this species shall be based on a ratio of 3:1 (compensation to impact) per acre for temporary impacts and 9:1 for permanent impacts, for an estimated total of 6 acres. These ratios ~~Ratios~~ reflect the limited habitat and low populations of			

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	this species across its range, and include both the loss of habitat use by the species, and the adverse effect of raptor predation caused by the new raptor perch availability at the new poles, and are consistent with compensation ratios established in the CVMSHCP. Greater or lesser compensation ratios may be substituted as determined though USFWS and CDFG consultation and/or permitting, considering the quality of the habitat being affected. The replacement habitat shall be within the Whitewater Floodplain Conservation Area of the CVMSHCP. Total compensation funds shall include the costs of acquisition and long-term management, and shall be paid prior to the start of Proposed Project operations. This replacement habitat shall mitigate for both direct and indirect impacts of construction and operations/management on this species, as well as the Palm Springs pocket mouse, Palm Springs round-tailed ground squirrel, CV giant sand-treader cricket, Le Conte's thrasher, flat-tailed horned lizard, and CV milkvetch (habitat conserved through this measure may be the same as that conserved through Mitigation Measure 4.4-1 for the CV milkvetch).			
Impact 4.4-3: Construction activities could result in adverse impacts to Palm Springs round-tailed ground squirrel and Palm Springs pocket mouse. *Less than significant with mitigation* (Class II)	**APM BIO-4.** BMPs. Crews will be directed to use Best Management Practices (BMPs) where applicable. These measures will be identified prior to construction and incorporated into the construction operations.	SCE and its contractors shall implement measure as defined.	SCE to provide the list of BMPs to be implemented to CPUC. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. During all phases of construction activities.
	Mitigation Measure 4.4-3: Palm Springs round-tailed ground squirrel colonies. SCE and/or its contractors shall flag and avoid all known Palm Springs round-tailed ground squirrel burrow colonies within the area of impact. To the extent feasible, ground squirrel colonies of unknown species within the project alignment shall also be avoided.	SCE and its contractors shall implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During all phases of construction activities.
Impact 4.4-4: Construction activities could result in adverse impacts to Coachella Valley giant sand-treader cricket. *Less than significant with mitigation* (Class II)	Implement Mitigation Measures 4.4-1 and 4.4-2.	See Mitigation Measures 4.4-1 and 4.4-2.	See Mitigation Measures 4.4-1 and 4.4-2.	See Mitigation Measures 4.4-1 and 4.4-2.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Impact 4.4-5: Construction activities may impact protected native, nesting birds. *Less than significant with mitigation* (Class II)	**APM BIO-7.** Avoid Impacts to Active Nests. SCE will conduct project-wide raptor surveys and remove trees, if necessary, outside of the nesting season (nesting season is usually February 1 to August 31). If a tree or pole containing a raptor nest must be removed during nesting season, or if work is scheduled to take place in close proximity to an active nest on an existing transmission tower or pole, SCE will coordinate with the CDFG and USFWS and obtain written verification prior to moving the nest.	SCE and its contractors shall implement measure as defined.	SCE to submit results of survey to CPUC. If nests are moved, SCE to submit verification of CDFG and USFWS consultation to CPUC.	Prior to commencement of construction activities. Prior to moving any active nests during all phases of construction activities.
	Mitigation Measure 4.4-5: Nesting native birds. SCE and/or its contractors shall implement the following measures to avoid impacts on nesting raptors and other protected birds for activities that are scheduled during the breeding season (February 1 through August 31): • No more than two weeks before construction within each new construction area, a qualified wildlife biologist shall conduct preconstruction surveys of all potential nesting habitat within 500 feet of construction sites where access is available. • If active nests are not identified, no further action is necessary. If active nests are identified during preconstruction surveys, a no-disturbance buffer shall be created around active raptor nests and nests of other special-status birds during the breeding season, or until it is determined that all young have fledged. Typical buffers are 500 feet for raptors and Le Conte's thrasher, and 250 feet for other nesting birds (e.g., waterfowl, and passerine birds). The size of these buffer zones and types of construction activities that are allowed in these areas could be further modified during construction in coordination with CDFG, and shall be based on existing noise and disturbance levels in the project area.	SCE and its contractors shall implement measure as defined.	SCE to submit results of survey to CPUC. CPUC mitigation monitor to monitor compliance.	Two weeks prior to commencement of construction within a new construction area, during all phases of construction. During all phases of construction.
Impact 4.4-6: Construction activities could result in direct and indirect impacts on burrowing owl. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.4-6: Burrowing owl.** No more than two weeks before beginning construction, a survey for burrows and burrowing owls shall be conducted by a qualified biologist within 500 feet of the project (access permitting), where suitable habitat is present. The survey shall conform to the protocol described by the California Burrowing Owl Consortium (1995), which includes up to	SCE and its contractors shall implement measure as defined.	SCE to submit resume of qualified biologist and survey results to CPUC for review. CPUC mitigation monitor to monitor compliance at least once per week.	Prior to commencement of construction activities. During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	four surveys on different dates if there are suitable burrows present. If unoccupied burrows are found within the survey area, they shall be collapsed outside of nesting season. If occupied owl burrows are found within the survey area, a determination shall be made by a qualified biologist, in consultation with the CDFG, as to whether or not work will affect the occupied burrows or disrupt reproductive behavior. • If it is determined that construction will not affect occupied burrows or disrupt breeding behavior, construction shall proceed without any restriction or mitigation measures. • If it is determined that construction will affect occupied burrows during the non-breeding season (August through February), the subject owls shall be passively relocated from the occupied burrow(s) according to a plan approved by the CDFG. The plan shall include installation of one-way doors in occupied burrows at least 48 hours before the burrows are excavated, and shall provide for the owl's relocation to nearby lands that possess available nesting habitat. • If it is determined that construction will physically affect occupied burrows or disrupt reproductive behavior during the nesting season (March through July), then avoidance is the only mitigation available. Construction shall be delayed within 250 feet of occupied burrows until it is determined that the subject owls are not nesting or until a qualified biologist determines that juvenile owls are self-sufficient or are no longer using the natal burrow as their primary source of shelter.			
Impact 4.4-7: Operation of new subtransmission and transmission lines could impact raptors as a result of electrocution or collision. *Less than significant* (Class III)	**APM BIO-8.** Avian Protection. All transmission and subtransmission towers and poles will be designed to be raptor-safe in accordance with the Suggested Practices for Raptor Protection on Power Lines: the State of the Art in 2006 (Avian Power Line Interaction Committee, 2006)	SCE and its contractors to implement measure as defined.	SCE to submit final transmission line designs demonstrating compliance with guidelines to CPUC.	Prior to commencement of construction activities.
Impact 4.4-8: New subtransmission and transmission line poles/towers could be used as perches by	**Mitigation Measure 4.4-8: Anti-perching device.** Anti-perching devices shall be placed on the new subtransmission line poles and new transmission line towers and poles.	SCE and its contractors to implement measure as defined.	SCE to submit documentation of anti-perching devices to be installed on poles and towers.	Prior to commencement of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
predatory birds, which could result in increased predation on special-status species in the project area. *Less than significant with mitigation* (Class II)			CPUC mitigation monitor to inspect compliance.	Immediately following tower and pole installation.
Impact 4.4-9: Construction and operation activities could impact active sand fields along the Farrell-Garnet 115 kV subtransmission line alignment. *Less than significant with mitigation* (Class II)	Implement Mitigation Measures 4.4-1 and 4.4-2.	See Mitigation Measures 4.4-1 and 4.4-2.	See Mitigation Measures 4.4-1 and 4.4-2.	See Mitigation Measures 4.4-1 and 4.4-2.
Impact 4.4-10: Construction activities could impact jurisdictional waters of the United States and waters of the State, including drainages and seasonal wetlands. *Less than significant with mitigation* (Class II)	**APM BIO-3.** Avoid Impacts to State and Federal Jurisdiction Wetlands. Construction crews will avoid impacting the streambeds and banks of streams along the route to the extent possible. If necessary, a Streambed Alteration Agreement (SAA) will be secured from the CDFG. Impacts will be mitigated based on the terms of the SAA. No streams with flowing waters capable of supporting special-status species will be expected to be impacted by the project.	SCE and its contractors to implement measure as defined.	If necessary, SCE to submit documentation of all SAAs to CPUC.	Prior to commencement of construction activities.
	Mitigation Measure 4.4-10: Wetlands. SCE and/or its construction contractors shall perform a wetland delineation and incorporate the results into the final design of subtransmission lines and access roads. The project shall be modified to minimize disturbance of Whitewater Wash, whenever feasible. In the event of any project changes that involve ground disturbance outside of the boundary of the existing wetland delineation, a new wetland delineation shall be performed. Where jurisdictional wetlands and other waters cannot be avoided, to offset temporary and permanent impacts that occur as a result of the project, mitigation shall be provided through the following mechanisms: • Purchase or dedication of land to provide wetland preservation, restoration, or creation. If restoration is available and feasible, then a mitigation replacement ratio of at least 2:1 shall be used. If a wetland needs to be created, at least a 3:1 ratio shall be implemented to offset losses. Where practical and feasible, onsite mitigation shall be implemented.	SCE and its contractors to implement measure as defined.	SCE to submit wetland delineation and final designs demonstrating wetland avoidance to CPUC. For wetland impacts that cannot be avoided, SCE to submit documentation of wetland offsets to CPUC. SCE to submit wetland mitigation and monitoring plan to CPUC and applicable regulatory agencies for review.	Prior to commencement of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	Greater or lesser offset ratios may be substituted through consultation and/or permitting with the appropriate wildlife agency (USFWS or CDFG). • A wetland mitigation and monitoring plan shall be developed by a qualified biologist or wetland scientist in coordination with CDFG, USFWS, USACE, and/or RWQCB that details mitigation and monitoring obligations for temporary and permanent impacts to wetlands and other waters as a result of construction activities. The plan shall quantify the total acreage lost, describe mitigation ratios for lost habitat, annual success criteria, mitigation sites, monitoring and reporting requirements, and site specific plans to compensate for wetland losses resulting from the project. The mitigation and monitoring plan shall be submitted to the appropriate regulatory agencies for approval. The plan and documentation of such agency approval shall be submitted to the CPUC prior to construction.			
Impact 4.4-12: The Proposed Project could conflict with provisions set forth in the Coachella Valley Multi-Species Conservation Plan. *Less than significant with mitigation* (Class II)	Implement Mitigation Measures 4.4-1, 4.4-2, 4.4-3, 4.4-5, 4.4-6, 4.4-8, and 4.4-10.	See Mitigation Measures 4.4-1, 4.4-2, 4.4-3, 4.4-5, 4.4-6, 4.4-8, and 4.4-10.	See Mitigation Measures 4.4-1, 4.4-2, 4.4-3, 4.4-5, 4.4-6, 4.4-8, and 4.4-10.	See Mitigation Measures 4.4-1, 4.4-2, 4.4-3, 4.4-5, 4.4-6, 4.4-8, and 4.4-10.
Cultural Resources				
Impact 4.5-2: Project construction could adversely affect the Hoon wit ten ca va (Garnet Hill), a Native American cultural resource. *Less than significant with mitigation* (Class II)	**APM CUL-1.** Native American Consultations. Continued consultation and communication with interested Native American community to understand the concerns of Native American members in identifying measures that would prevent direct and indirect impacts. One such measure may include the following: if previously unidentified archaeological resources are unearthed during construction activities, construction will be halted in that area and directed away from the discovery, until a qualified archaeologist assesses the significance of the resource. The archaeologist would recommend appropriate measures to record, preserve, or recover the resources.	SCE and its contractors to implement measure as defined.	SCE to submit updates on Native American Consultations to CPUC on a quarterly basis.	Prior to and throughout all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	APM CUL-6. Garnet Hills Native American Cultural Resource. Appropriate measures, if deemed necessary, would be developed in consultation with Native American community members, as recommended by the NAHC, to address potential impacts to the Garnet Hills Native American cultural resource.	SCE and its contractors to implement measure as defined.	See Mitigation Measure 4.5-2.	See Mitigation Measure 4.5-2
	Mitigation Measure 4.5-2: Additional consultation shall be conducted with Native American community members regarding Hoon wit ten ca va (Garnet Hill). An agreement document that addresses potential impacts to this resource and sets forth an agreement concerning how to minimize impacts shall be created and signed by the tribes and SCE, and shall be submitted to the CPUC as documentation that the consultation has occurred.	SCE and its contractors shall implement measure as defined.	SCE to submit signed agreement to CPUC for review. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. During all phases of construction activities.
Impact 4.5-3: Project construction could adversely affect cultural resources CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~. *Less than Significant with Mitigation* (Class II)	**APM CUL-3.** Construction Monitoring. All ground-disturbing activities occurring along the Proposed Mirage-Santa Rosa 115 kV Subtransmission Line Alternative (Route 4) would be monitored by a qualified archaeologist. The route is highly sensitive for cultural resources.	SCE and its contractors to implement measure as defined.	SCE to submit resume of qualified archeologist to CPUC for review. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. During all ground disturbing activities along the proposed Mirage-Santa Rosa 115 kV alignment.
	APM CUL-4. Data Recovery Plan. An evaluation and data recovery plan shall be developed to address impacts to CA-RIV-785, 33-15429, and 33-15430.	SCE and its contractors to implement measure as defined.	SCE to submit data recovery plan to CPUC for review. (*see also Mitigation Measure 4.5-3b*)	Prior to commencement of construction activities.
	APM CUL-5. Cultural Resources Plan. A cultural resource management plan shall be developed to prevent operational impacts to the cultural resource located between the Mirage Substation and I-10.	SCE and its contractors to implement measure as defined.	SCE to submit cultural resources plan to CPUC for review. (*see also Mitigation Measure 4.5-3b*)	Prior to commencement of construction activities.
	Mitigation Measure 4.5-3a: Avoid and protect archaeological resources. SCE shall narrow the construction zone to avoid potentially significant archaeological resources CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~ if feasible. The resources shall be designated as Environmentally Sensitive Areas (ESAs) to ensure avoidance. Protective fencing or other markers shall be erected around ESAs prior to any ground disturbing activities; however, such ESAs shall not be identified specifically as cultural resources, in order to protect sensitive information and to discourage unauthorized disturbance or collection of artifacts.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	Mitigation Measure 4.5-3b: Preparation of treatment plan if avoidance is not feasible. If avoidance of sites CA-RIV-785~~,~~ and 33-15429~~, and 33-15430~~ is not feasible, prior to issuing any grading or excavation permits and prior to any project-related ground disturbing activities, a detailed Historic Properties Treatment Plan (HPTP) shall be prepared by SCE and implemented by a qualified archaeologist. The HPTP shall include a research design and a scope of work for data recovery, in conformance with APM CUL-4, or additional treatment of potentially significant archaeological sites that cannot be avoided. Data recovery on most resources would consist of sample excavation and/or surface artifact collection in the area of direct impact, and site documentation, with the aim to target the recovery of important scientific data contained in the portion(s) of the archaeological resource(s) to be impacted by the project. As specified in APM CUL-5, a long-term management plan shall also be developed by SCE for those resources that can be avoided during project construction, in order to minimize future impacts during project operation and maintenance. The HPTP shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and State repositories, libraries, and interested professionals.	SCE and its contractors to implement measure as defined.	SCE to submit HPTP and resume of the archeologist that prepared the plan to CPUC for review. CPUC mitigation monitor to monitor compliance.	Prior to commencement of any ground disturbing activities. During all phases of construction activities.
	Mitigation Measure 4.5-3c: Due to the sensitivity of the project area for Native American resources, in addition to archaeological monitoring as specified in APM CUL-3, at least one Native American monitor shall also monitor all ground-disturbing activities along the proposed Mirage-Santa Rosa 115 kV subtransmission line alignment. Selection of monitors by SCE shall be made by agreement of the Native American groups identified by the Native American Heritage Commission as having affiliation with the project area, with documentation of such agreement submitted to the CPUC.	SCE and its contractors to implement measure as defined.	SCE to provide CPUC with name and contact information for the designated Native American monitor. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. During all ground disturbing activities along the proposed Mirage-Santa Rosa 115 kV alignment.
Impact 4.5-4: Project construction could adversely affect currently unknown cultural resources. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.5-4a:** Any accidental discovery of cultural resources during construction shall be evaluated by a qualified archaeologist. If the find is determined to be potentially significant, the archaeologist, in consultation with the CPUC and appropriate Native American	SCE and its contractors to implement measure as defined.	SCE to suspend work and contact CPUC if archaeological resources are discovered.	During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	group(s), shall develop a treatment plan. All work adjacent to the unanticipated discovery (estimated at 25 feet) shall cease until the qualified archaeologist has evaluated the discovery, and/or the treatment plan has been implemented.		If resource is significant, submit site treatment plan and records of consultation with Native American representatives to CPUC.	Within 5 business days of determining a find is significant.
	Mitigation Measure 4.5-4b: An archaeologist meeting the Secretary of the Interior's Professional Qualification Standards shall be retained by SCE to oversee and implement the applicant proposed measures and mitigation measures stipulated in this Environmental Impact Report.	SCE and its contractors to implement measure as defined.	SCE to submit resume of archeologist to CPUC for review.	Prior to commencement of construction activities.
	Mitigation Measure 4.5-4c: Prior to any ground disturbing activity, those portions of the project area not surveyed because of low visibility or lack of access shall be surveyed by a qualified archaeologist. After additional archaeological survey is carried out, the archaeologists shall evaluate any cultural resources recorded during the course of the survey for their eligibility for listing on the National Register or California Register, make recommendations for treatment of these resources if found to be significant, and make recommendations concerning archaeological monitoring during construction in the survey areas.	SCE and its contractors to implement measure as defined.	SCE to submit findings of archeological surveys to CPUC for review.	Prior to commencement of construction activities.
Impact 4.5-5: The project could adversely affect unidentified paleontological resources. *Less than significant* (Class III)	**APM PA-1.** Paleontological Field Assessment. Conduct a paleontological field assessment of the finalized ROWs for the Proposed Project, as needed.	SCE and its contractors to implement measure as defined.	SCE to submit findings of paleontological field assessment to CPUC for review.	Prior to commencement of construction activities.
	APM PA-2. Paleontological Resources. Prior to construction, a paleontologist would salvage known, exposed paleontological resources. This would consist of collecting standard samples of fossiliferous sediments.	SCE and its contractors to implement measure as defined.	SCE to submit documentation of resources salvaged to CPUC for review.	Prior to commencement of construction activities.
	APM PA-3. Paleontological Monitoring. A paleontological monitor would be present during ground-disturbing activities within areas designated as having a high possibility for the presence of paleontological resources. The monitor would be empowered to temporarily halt or redirected construction activities to ensure avoidance of adverse impacts.	SCE and its contractors to implement measure as defined.	SCE to submit resume of paleontological monitor to CPUC for review. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	APM PA-4. Salvage and Recovery of Paleontological Resources. Upon encountering a large deposit of bone, salvage of all bone in the area would be conducted in accordance with modern paleontological techniques.	SCE and its contractors to implement measure as defined.	If a large deposit of bone is discovered, SCE to notify CPUC of finding. CPUC mitigation monitor to monitor compliance.	During all phases of construction activities.
	APM PA-5. Transfer of Fossils to Museum. All fossils collected would be prepared to a reasonable point of identification. Itemized catalogs of all material collected and identified would be provided to a museum repository along with the specimens. A specimen repository would be arranged, in writing, with a museum prior to initiation of construction excavation.	SCE and its contractors to implement measure as defined.	SCE to submit documentation of specimen repository to CPUC for review.	Submit documentation of repository arrangement prior to commencement of construction activities.
	APM PA-6. Paleontological Reporting. A report documenting the results of the monitoring and salvage activities and the significance of the fossils would be prepared.	SCE and its contractors to implement measure as defined.	SCE to submit paleontological report to CPUC for review.	At the completion of construction activities.
Impact 4.5-6: Project construction could result in damage to previously unidentified human remains. *Less than significant* (Class III)	**APM CUL-2.** Discovery of Human Remains. If human remains are encountered during construction or any other phase of development, work in the area of the discovery must be halted in that area and directed away from the discovery. No further disturbance would occur until the county coroner makes the necessary findings as to origin, pursuant to Public Resources Code 5097.98-99, Health and Safety Code 7050.5. If the remains are determined to be Native American, then the NAHC would be notified within 24 hours, as required by Public Resources Code 5097. The Native American Heritage Commission (NAHC) would notify the designated Most Likely Descendants, who would provide recommendations for the treatment of the remains within 24 hours. The NAHC mediates any disputes regarding the treatment of remains.	SCE and its contractors to implement measure as defined.	If human remains are discovered, SCE is to notify the CPUC and Riverside County coroner within one hour. CPUC mitigation monitor to monitor compliance at least once a week.	During all phases of construction activities.
Geology and Soils				
Impact 4.6-1: Ground surface rupture of an active fault could damage the Proposed Project which, in turn, could pose a hazard to nearby structures or people. *Less than significant* (Class III)	**APM GEO-2.** Subsurface Trenching. Where appropriate, subsurface trenching along active fault traces would be required to ensure tower foundations are not placed on, or immediately adjacent to, these features. In addition, tower locations would be selected to accommodate anticipated fault offset, and minimize excessive tension in lines, should a fault movement occur.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance during construction activities near active faults.	During all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Impact 4.6-2: Strong seismic ground shaking could cause damage to Proposed Project structures which, in turn, could pose a risk of loss, injury, or death. *Less than significant* (Class III)	**APM GEO-1.** Seismic Design for Ground Shaking. A geotechnical investigation of site soils and geologic conditions, coupled with engineering design, would identify the hazards and develop recommendations to support appropriate seismic designs to mitigate the effects of ground shaking. Specific requirements for seismic design would be based on the IEEE 693 "Recommended Practices for Seismic Design of Substations."	SCE and its contractors to implement measure as defined.	SCE to submit results of geotechnical investigations to CPUC for review.	Prior to commencement of construction activities.
Hazards and Hazardous Materials				
Impact 4.7-1: Construction activities would require the use of certain materials such as fuels, oils, solvents, and other chemical products that could pose a potential hazard to the public or the environment if improperly used or inadvertently released. *Less than significant* (Class III)	**APM HAZ-1.** Hazardous Materials and Waste Handling Management. Hazardous materials used and stored onsite for the proposed construction activities - as well as hazardous wastes generated onsite as a result of the proposed construction activities – would be managed according to the specifications outlined below. • *Hazardous Materials and Hazardous Waste Handling*: A project-specific hazardous materials management and hazardous waste management program would be developed prior to construction of the project. The program would outline proper hazardous materials use, storage, and disposal requirements, as well as hazardous waste management procedures. The program would identify types of hazardous materials to be used during the project and the types of wastes that would be generated. All project personnel would be provided with project-specific training. This program would be developed to ensure that all hazardous materials and wastes are handled in a safe and environmentally sound manner. Hazardous wastes would be handled and disposed of according to applicable rules and regulations. Employees handling wastes would receive hazardous materials training and shall be trained in hazardous waste procedures, spill contingencies, waste minimization procedures and Treatment, Storage, and Disposal Facility (TSDF) training in accordance with OSHA Hazard Communication Standard and 22 CCR. SCE would use landfill facilities that are authorized to accept treated wood pole waste in accordance with HSC 25143.1.4(b).	SCE and its contractors to implement measure as defined.	SCE to submit documentation to the CPUC demonstrating that all construction personnel have undergone hazardous materials management training. SCE to submit a copy of the SWPPP to the CPUC for review. SCE to submit a copy of written procedures for transporting hazardous wastes to CPUC for review. SCE to submit a copy of the procedures for fueling and maintenance to CPUC for review. CPUC mitigation monitor to monitor compliance with procedures at least once per week during construction activities. SCE to submit a copy of the Emergency Release Response Procedures to CPUC for review.	Submit all applicable plans to CPUC prior to commencement of construction activities. Monitor compliance with plans during all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	• *Construction Stormwater Pollution Prevention Plan (SWPPP)*: A project-specific construction SWPPP would be prepared and implemented prior to the start of construction of the Proposed Project. The SWPPP would utilize BMPs to address the storage and handling of hazardous materials and sediment runoff during construction activities. • *Transport of Hazardous Materials:* Hazardous materials that would be transported by truck include fuel (diesel fuel and gasoline) and oil and lubricants for equipment. Containers used to stored hazardous materials would be properly labeled and kept in good condition. Written procedures for the transport of hazardous materials used would be established in accordance with U.S. Department of Transportation and Caltrans regulations. A qualified transporter would be selected to comply with U.S. Department of Transportation and Caltrans regulations. • *Fueling and Maintenance of Construction Equipment:* Written procedures for fueling and maintenance of construction equipment would be prepared prior to construction. Vehicles and equipment would be refueled onsite or by tanker trucks. Procedures would include the use of drop cloths made of plastic, drip pans, and trays, to be placed under refilling areas to ensure that chemicals do not come into contact with the ground. Refueling stations would be located in designated areas where absorbent pads and trays would be available. The fuel tanks also would contain a lined area to ensure that accidental spillage does not occur. Drip pans or other collection devices would be placed under the equipment at night to capture drips or spills. Equipment would be inspected daily for potential leakage or failures. Hazardous materials, such as paints, solvents, and penetrants, would be kept in an approved locker or storage cabinet. • *Emergency Release Response Procedures*: An Emergency Response Plan detailing responses to releases of hazardous materials would be developed prior to construction activities. It would prescribe hazardous materials handling procedures for reducing			

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	the potential for a spill during construction and would include an emergency response program to ensure quick and safe cleanup of accidental spills. All hazardous materials spills or threatened release, including petroleum products such as gasoline, diesel, and hydraulic fluid, regardless of the quantity spilled, would be immediately reported if the spill has entered a navigable water, stream, lake, wetland, or storm drain, if the spill impacted any sensitive area including conservation areas and wildlife preserved, or if the spill caused injury to a person or threatens injury to public health. All construction personnel, including environmental monitors, would be aware of state and federal emergency response reporting guidelines.			
Impact 4.7-2: Project operations would require the use of certain materials such as fuels, oils, solvents, and other chemical products that could pose a potential hazard to the public or the environment if improperly used or inadvertently released. Less than significant (Class III)	**APM HAZ-3.** Spill Prevention, Counter Measure, and Control Plan (SPCC). In accordance with Title 40 of the CFR, Part 112, SCE would prepare an updated SPCC for appropriate substations within the Proposed Project. The plans would include engineered and operational methods for preventing, containing, and controlling potential releases, and provisions for quick and safe cleanup.	SCE and its contractors to implement measure as defined.	SCE to submit updated SPCC to CPUC to review.	Prior to commencement of project operations.
	APM HAZ-4. Hazardous Materials Business Plan (HMBPs). SCE would prepare and submit an updated HMBP for appropriate substations within the Proposed Project. The required documentation would be submitted to the Certified Unified Program Agency (CUPA). The HMBPs would include hazardous materials and hazardous waste management procedures and emergency response procedures, including emergency spill cleanup supplies and equipment.	SCE and its contractors to implement measure as defined.	SCE to submit a copy of the updated HMBP to CPUC.	Prior to commencement of project operations.
Impact 4.7-3: Construction activities could release previously unidentified hazardous materials into the environment. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.7-3:** SCE's Hazardous Substance Control and Emergency Response Plan (APM HYDRO-4) shall include provisions that would be implemented if any subsurface hazardous materials are encountered during construction. Provisions outlined in the plan shall include immediately stopping work in the contaminated area and contacting appropriate resource agencies, including the CPUC designated monitor, upon discovery of subsurface hazardous materials. The plan shall include the phone numbers of County and State agencies and primary, secondary, and final cleanup procedures. The Hazardous Substance Control and Emergency Response Plan shall	SCE and its contractors to implement measure as defined.	SCE to submit copy of plan to CPUC for review.	Prior to commencement of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	be submitted to the CPUC for review and approval prior to the commencement of construction activities.			
Impact 4.7-7: Construction and operation of the Proposed Project could ignite dry vegetation and start a fire. *Less than significant with mitigation* (Class II)	**APM HAZ-2.** Fire Management Plan. The Fire Management Plan would be developed by SCE prior to start of construction.	SCE and its contractors to implement measure as defined.	SCE to submit a copy of the Fire Management Plan, including documentation of SCE's consultation with local fire departments, to the CPUC for review.	Prior to commencement of construction activities.
	Mitigation Measure 4.7-7: The Fire Management Plan required pursuant to APM HAZ-2 shall include provisions that require water tanks or other fire suppression devices to be sited at the project sites and be available for fire protection. The plan shall require construction vehicles to contain fire suppression equipment. SCE shall contact and coordinate with all applicable fire departments to determine minimum amounts of fire equipment to be carried on the vehicles and appropriate locations for the water tanks/fire suppression devices. The Fire Management Plan shall document SCE's consultation with the local fire departments. The Fire Management Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities.	SCE and its contractors to implement measure as defined.	SCE to submit a copy of the Fire Management Plan, including documentation of SCE's consultation with local fire departments, to the CPUC for review.	Prior to commencement of construction activities.
Hydrology and Water Quality				
Impact 4.8-1: Construction activities could result in increased erosion and sedimentation and/or pollutant (e.g., fuel and lubricant) loading to surface waterways, which could increase turbidity, suspend soils, or otherwise decrease water quality in surface waterways. *Less than significant* (Class III)	**APM HYDRO-1.** Grading Activities. Grading activities would not commence if heavy rain is forecasted for the period of time of major earthmoving activities through compaction and stabilization of the site.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During all phases of construction activities involving grading.
	APM HYDRO-2A. Erosion Control and Drainage Plan. An engineered erosion control and drainage plan would be developed as part of the site grading plan. The plan would be developed in accordance with the County of Riverside Hydrology Manual and would address all construction activities associated with the project. The location of the discharge of site runoff for construction would be defined in final engineering and in consultation with Riverside County, the RWQCB, and the CDFG.	SCE and its contractors to implement measure as defined.	SCE to submit plan and documentation of consultation with Riverside County, the RWQCB, and the CDFG to CPUC for review.	Prior to commencement of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	APM HYDRO-2B. Construction Erosion Control Plan. SCE shall develop an erosion control plan incorporating construction-phase measures to limit and control erosion and siltation. The erosion control plan shall include components such as phasing of grading, limiting areas of disturbance, diversion of runoff away from disturbed areas, protective measures for sensitive areas, outlet protection, and provision for revegetation or mulching. The plan shall also prescribe treatment measures to trap sediment once it has been mobilized, at a scale and density appropriate to the size and slope of the catchment.	SCE and its contractors to implement measure as defined.	SCE to submit plan to CPUC for review.	Prior to commencement of construction activities.
	APM HYDRO-2C. Environmental Training Program. An environmental training program would be established to communicate environmental concerns and appropriate work practices, including spill prevention and response measures, to all field personnel involved in the construction of the Proposed Project elements. A monitoring program would be implemented to ensure that the plans are followed throughout the period of construction.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to attend training program and to monitor compliance with program periodically during construction activities.	Prior to and during all phases of construction activities.
	APM HYDRO-3. Access Road Location. Prior to final engineering of the proposed access road, SCE would consult with Riverside County, CDFG, and the RWQCB regarding the location of the access road.	SCE and its contractors to implement measure as defined.	SCE to submit documentation of consultation with Riverside County, the RWQCB and the CDFG to CPUC for review.	Prior to commencement of construction activities.
	APM HYDRO-4. Hazardous Substance Control and Emergency Response Plan. SCE would prepare a Hazardous Substance Control and Emergency Response Plan, which would include preparations for quick and safe cleanup of accidental spills. This plan would be submitted to agencies with the grading permit application. It would prescribe hazardous materials handling procedures for reducing the potential for a spill during construction, and would include an emergency response program to ensure quick and safe cleanup of accidental spills. The plan would identify areas where refueling and vehicle maintenance activities and storage of hazardous materials, if any, would be permitted. Oil-absorbent materials, tarps, and storage drums would be used to contain and control any minor releases of mineral oil.	SCE and its contractors to implement measure as defined.	SCE to submit Hazardous Substance and Emergency Response Plan to CPUC for review.	Prior to commencement of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Impact 4.8-4: Proposed Project construction activities could impact local drainage patterns, or the course of a given stream, resulting in substantial on- or off-site erosion or sedimentation. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.8-4a:** In addition to measures required by APM HYDRO-1, SCE shall ensure that the construction foreman checks daily weather forecasts when construction is occurring within the Whitewater River Wash. Any precipitation forecast shall require the construction contractor to ensure erosion control BMPs identified in the SWPPP are properly installed and shall ensure that the construction site is clear of equipment and debris.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During construction activities within the Whitewater River Wash.
	Mitigation Measure 4.8-4b: ~~Regarding the engineered erosion control and drainage plan developed as part of the site grading plan (APM HYDRO-2A), SCE shall conduct a topographic and gradient survey of the Whitewater River Wash both upstream and downstream of the proposed pole(s) replacement location within the wash. Post construction topography and gradient of the Whitewater River Wash shall be contoured~~ SCE shall restore all areas on the Whitewater Wash disturbed during construction of the Proposed Project to match the existing conditions, to ensure that the drainage pattern is not altered in a manner that would cause on- or off-site erosion or sedimentation.	SCE and its contractors to implement measure as defined.	~~SCE to submit results of topographic and gradient survey to CPUC for review. CPUC mitigation monitor to inspect compliance.~~ CPUC mitigation monitor to monitor compliance.	~~Survey results to be submitted prior to construction activities within the Whitewater River Wash.~~ Following construction activities within the Whitewater River Wash. Inspection to be performed following completion of grading activities within the wash.
Land Use, Planning, and Policies				
Impact 4.9-2: The Proposed Project could conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the Proposed Project adopted for the purpose of avoiding or mitigating an environmental effect. *Less than significant* (Class III)	**APM LU-1.** Aeronautical Considerations. As indicated in the Study of Aeronautical Considerations (2007), SCE would submit notice to the FAA electronically, in accordance with FAA procedures and as far in advance of construction as possible.	SCE and its contractors to implement measure as defined.	SCE to provide documentation to CPUC demonstrating that the FAA has been notified of project construction.	Prior to commencement of construction activities.
Impact 4.9-3: The Proposed Project could conflict with provisions set forth in the Coachella Valley Multiple Species Conservation Plan. *Less than significant with mitigation* (Class II)	Implement Mitigation Measures 4.4-1, 4.4-2, 4.4-3, 4.4-5, 4.4-6, 4.4-8, and 4.4-10 (see Section 4.4, Biological Resources).	See Mitigation Measures 4.4-1, 4.4-2, 4.4-3, 4.4-5, 4.4-6, 4.4-8, and 4.4-10.	See Mitigation Measures 4.4-1, 4.4-2, 4.4-3, 4.4-5, 4.4-6, 4.4-8, and 4.4-10.	See Mitigation Measures 4.4-1, 4.4-2, 4.4-3, 4.4-5, 4.4-6, 4.4-8, and 4.4-10.
Mineral Resources				
No APMs or mitigation required.				

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Noise				
Impact 4.11-2: Transformer noise at Mirage Substation would increase noise levels in the vicinity, potentially conflicting with applicable noise standards. *Less than Significant with Mitigation* (Class II)	**Mitigation Measure 4.11-2**: Mirage Substation. SCE shall ensure that noise levels associated with the Mirage Substation do not exceed the Riverside County noise standards for stationary sources. Noise control techniques may include, but not be limited to: locating the new transformer with as much setback from the existing residential properties as possible, use of noise walls or equivalent sound attenuation devices, and the use of a transformer with special noise control specifications designed in a way to specifically achieve acceptable regulatory noise standards. Prior to the installation of the new transformer, SCE shall submit to the CPUC ~~and the County of Riverside~~ for review and approval a plan that describes the specific measures that will be taken in order to comply with the County's stationary noise standards. Once the proposed transformer is operational, SCE shall retain an acoustical engineer to perform noise measurements in the vicinity of the residences west of Mirage Substation to verify that transformer noise levels comply with the County standards. Documentation of compliance shall be submitted to the CPUC ~~and Riverside County~~. In the event the transformer noise levels violate the standards, additional noise control techniques shall be initiated to correct the violation.	SCE and its contractors to implement measure as defined.	SCE to submit plan for compliance to ~~Riverside County and~~ CPUC for review and approval. SCE to retain an acoustical engineer, and submit documentation of compliance to the CPUC ~~and Riverside County~~.	Prior to commencement of construction activities. Once the transformer is operational.
Impact 4.11-3: Construction activities could expose people and/or structures to substantial vibration levels. Less than significant (Class III)	**APM NOISE-1.** Noise Ordinances. SCE would comply with all applicable noise ordinance construction schedules. In the event the construction must occur outside the allowable work hours, a variance would be obtained.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance. SCE to provide CPUC with evidence that variance has been obtained if necessary.	During construction. Prior to commencement of nighttime construction activities.
Impact 4.11-5: Transformer noise at Mirage Substation could permanently increase ambient noise levels in the vicinity of the substation. *Less than Significant with Mitigation* (Class II)	Implement Mitigation Measure 4.11-2.	See Mitigation Measure 4.11-2.	See Mitigation Measure 4.11-2.	See Mitigation Measure 4.11-2.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Impact 4.11-6: Adverse noise levels would be generated during project construction. *Less than Significant with Mitigation* (Class II)	**APM NOISE-2.** Noise Control Equipment Maintenance. Maintain all noise-control equipment in good working order, in accordance with manufacturers' specifications.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During all phases of construction activities.
	APM NOISE-3. Handling of Noise Complaints. During construction, investigate, document, evaluate, and attempt to resolve legitimate project-related noise complaints. This would involve attempting to contact the source (person or persons) of the noise complaint within 24 hours; investigating to determine the project noise source(s) that led to the complaint; and taking all feasible measures to reduce the noise at the source, if the complaint is legitimate.	SCE and its contractors to implement measure as defined.	SCE to provide CPUC with a summary of all noise complaints no later than 48 hours after each complaint is made. The summary shall also indicate how the complaint was handled.	During construction.
	Mitigation Measure 4.11-6a: To strengthen the intent of APM NOISE-2 and APM NOISE-3, the following noise reduction and suppression techniques shall be employed during project construction to minimize the impact of temporary construction-related noise on nearby sensitive receptors: • Comply with manufacturers' muffler requirements. • Notify residences in advance of the construction schedule and how many days they may be affected. Provide a phone number for a construction supervisor who would handle construction noise questions and complaints. • Minimize idling of engines; turn off engines when not in use, where applicable. • Shield compressors and other small stationary equipment with portable barriers when within 100 feet of residences. • Route truck traffic away from noise-sensitive areas where feasible.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance. SCE to provide CPUC with evidence that residences have been notified.	During construction. Prior to construction activities at any one location.
	Mitigation Measure 4.11-6b: In the event that nighttime (i.e., between 7:00 p.m. and 7:00 a.m.) construction activity is determined to be necessary; a nighttime noise reduction plan shall be developed by SCE and submitted to the CPUC for review and approval. The noise reduction plan shall include a set of site-specific noise attenuation measures that apply state of the art noise reduction technology to ensure that nighttime construction noise levels and associated nuisance are reduced to the most extent feasible.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance. SCE to submit nighttime noise reduction plan to CPUC for review and approval.	During construction. Prior to commencement of nighttime construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	The attenuation measures may include, but not be limited to, the control strategies and methods for implementation that are listed below. If any of the following strategies are determined by SCE to not be feasible, an explanation as to why the specific strategy is not feasible shall be included in the nighttime noise reduction plan. • Plan construction activities to minimize the amount of nighttime construction. • Offer temporary relocation of residents within 200 feet of nighttime construction areas. • Temporary noise barriers, such as shields and blankets, shall be installed immediately adjacent to all nighttime stationary noise sources (e.g., drilling rigs, generators, pumps, etc.). • Install temporary noise walls that block the line of sight between nighttime activities and the closest residences.			
Population and Housing				
No APMs or mitigation required.				
Public Services				
Impact 4.13-1: Project construction activities could temporarily increase the demand for fire protection and emergency medical services. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.13-1:** SCE shall prepare and implement a Health and Safety Plan to ensure the health and safety of construction workers and the public during construction. The plan shall list procedures and specific emergency response and evacuation measures that would be required to be followed during emergency situations. The plan shall be submitted to the CPUC for approval prior to commencement of construction activities and shall be distributed to all construction crew members prior to construction and operation of the project.	SCE and its contractors to implement measure as defined.	SCE to submit Plan to CPUC for review and approval. CPUC mitigation monitor to monitor compliance at least once per week.	SCE to submit plan prior to commencement of construction activities. Monitor compliance during all phases of construction activities.
Impact 4.13-2: Project construction activities in proximity to public roadways could potentially affect vehicle access and fire department response times. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.13-2:** SCE shall coordinate with the emergency service providers of the applicable cities and Riverside County prior to construction to ensure that construction activities and associated lane closures would not significantly affect emergency response vehicles. SCE shall submit verification of its consultation with emergency service providers to the CPUC prior to the commencement of construction.	SCE and its contractors to implement measure as defined.	SCE to submit verification of its consultation with emergency service providers to the CPUC.	Prior to commencement of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Recreation				
Impact 4.14-1: Construction of the proposed Mirage-Santa Rosa 115 kV Subtransmission line would temporarily disrupt operations of the Tri-Palm Golf Course. *Less than significant* (Class III)	**APM REC-1.** Recreation Area Closures. When temporary short-term closures to recreational areas are necessary for construction activities, SCE would coordinate those closures with recreational facility owners. To the extent practicable, SCE would schedule construction activities to avoid heavy recreational use periods (e.g., holidays or tournaments). SCE would post notice of the closure onsite 14 calendar days prior to the closure.	SCE and its contractors to implement measure as defined.	SCE to submit verification of its consultation with nearby recreational facilities to the CPUC. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. During all phases of construction activities.
Transportation and Traffic				
Impact 4.15-1: Construction activities could adversely affect traffic and transportation conditions in the project area. *Less than significant with mitigation* (Class II)	**APM TRA-1.** Obtain Permits. If any work requires modifications or activities within local roadway ROWs, appropriate permits will be obtained prior to the commencement of construction activities, including any necessary local permits and encroachment permits.	SCE and its contractors to implement measure as defined.	SCE to submit copies of encroachment permits to CPUC.	Prior to commencement of construction activities.
	APM TRA-2. Traffic Management and Control Plans. Traffic control and other management plans will be prepared where necessary to minimize project impacts on local streets.	SCE and its contractors to implement measure as defined.	SCE to submit Traffic Management Plan to CPUC for review and approval. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. Monitor compliance during all phases of construction activities.
	APM TRA-3. Minimize Street Use. Construction activities will be designed to minimize work on or use of local streets.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During all phases of construction activities.
	Mitigation Measure 4.15-1: SCE's Traffic Management and Control Plan, as required by APM TRA-2, shall include, at a minimum, the measures listed below. The Plan shall be submitted to the CPUC for approval and shall be distributed to all construction crew members prior to commencement of construction activities. The Plan shall: • Include a discussion of work hours, haul routes, work area delineation, traffic control and flagging; • Identify all access and parking restriction and signage requirements; • Require workers to park personal vehicles at the approved staging area and take only necessary project vehicles to the work sites; • Lay out plans for notifications and a process for communication with affected residents and landowners	SCE and its contractors to implement measure as defined.	SCE to submit Traffic Management Plan to CPUC for review and approval. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. Monitor compliance during all phases of construction activities.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
	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 road/lanes and access point/driveways/parking areas would be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints; • Include plans to coordinate all construction activities with emergency service providers in the area, consistent with Mitigation Measure 4.13-2 (see Section 4.13, *Public Services*). Emergency service providers would be notified of the timing, location, and duration of construction activities. All roads would remain passable to emergency service vehicles at all times; and • Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow.			
Impact 4.15-2: Project construction activities could increase potential traffic safety hazards for vehicles, bicyclists, and pedestrians on public roadways. *Less than significant with mitigation* (Class II)	Implement Mitigation Measure 4.15-1.	See Mitigation Measure 4.1-15.	See Mitigation Measure 4.1-15.	See Mitigation Measure 4.1-15.
Impact 4.15-3: Construction activities could result in delays for emergency vehicles on project area roadways. *Less than significant with mitigation* (Class II)	Implement Mitigation Measures 4.15-1 and 4.13-2.	See Mitigation Measures 4.1-15 and 4.13-2.	See Mitigation Measures 4.1-15 and 4.13-2.	See Mitigation Measures 4.1-15 and 4.13-2.
Impact 4.15-ALT2-1:* Alternative 2 underground line construction activities could adversely affect traffic conditions in the study area and could result in delays for emergency vehicles on roadways within the study area. *Less than significant with mitigation* (Class II)	**Mitigation Measure 4.15-ALT2-1:*** In addition to the requirements included in Mitigation Measure 4.15-1, the Traffic Management and Control Plan shall: • Include a requirement that all open trenches be covered with metal plates at the end of each workday to accommodate traffic and access; and • Include a circulation and detour plan to minimize impacts to local street circulation when lane and/or road closures are required due to trenching activities.	SCE and its contractors to implement measure as defined.	SCE to submit Traffic Management Plan to CPUC for review and approval. CPUC mitigation monitor to monitor compliance.	Prior to commencement of construction activities. Monitor compliance during all phases of construction activities that involve open trenching.

TABLE 8-1 (Continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE DEVERS-MIRAGE 115 KV SUBTRANSMISSION SYSTEM SPLIT PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
* Impact 4.15-ALT2-1 would be applicable to the approval of Alternatives 2, 3, 5, or 6.	* Mitigation Measure 4.15-ALT2-1 would be applicable to the approval of Alternatives 2, 3, 5, or 6.			
Impact 4.15-ALT2-2:* Trenching activities associated with construction of the underground portion of Alternative 2 could result in roadway damage along Vista Chino and Sunrise Way. *Less than significant with mitigation* (Class II) * Impact 4.15-ALT2-2 would be applicable to the approval of Alternatives 2, 3, 5, or 6.	**Mitigation Measure 4.15-ALT2-2:*** In order to reduce potential roadway damage impacts from trenching activities within public roadways, SCE and/or its contractors shall repair any damaged roadway to its original condition immediately after construction has completed. Photo documentation showing roadways prior to and following construction shall be submitted to the CPUC and applicable State and/or local agencies with jurisdiction of the roadways to demonstrate compliance with this measure. * Mitigation Measure 4.15-ALT2-2 would be applicable to the approval of Alternatives 2, 3, 5, or 6.	SCE and its contractors to implement measure as defined.	SCE to submit photo documentation showing roadways prior to and following construction activities. CPUC mitigation monitor to inspect compliance in the field.	Immediately following completion of roadway restoration. Monitor compliance once trenching is complete and all roadways have been restored.
Utilities and Service Systems				
Impact 4.16-1: Underground utility lines and/or facilities could be disturbed during Proposed Project construction activities. *Less than significant* (Class III)	**APM PUSVC-01.** Work Around High Pressure Gas Lines. No mechanical equipment will be permitted to operate within 3 feet of the Southern California Gas Company high-pressure pipelines, and any closer work must be done by hand.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During construction activities near the high-pressure pipelines.
	APM PUSVC-02. Monitoring by the Southern California Gas Company. A representative of the Southern California Gas Company must observe the excavation around or near their facilities to insure protection and to record pertinent data necessary for their operations.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During construction activities near the high-pressure pipelines.

APPENDIX F

Certificate of Service

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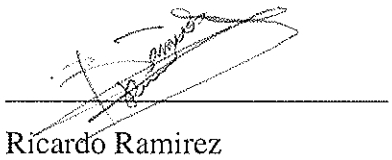
CERTIFICATE OF SERVICE

I, Ricardo Ramirez, of ESA, certify that I have on this date caused the following:

Publication of the Final Environmental Impact Report (EIR) for SCE's Application to the California Public Utilities Commission pursuant to General Order (GO) 131-D to construct and operate the Devers-Mirage 115 kV Subtransmission System Split Project. As documented in the comprehensive mailing list in Chapter 6 of the Final EIR, copies of the Final EIR are to be served by overnight delivery service or United States Postal Service to the CPUC, SCE, listed parties on the CPUC Service List, and all individuals who submitted written or oral comments on the Draft EIR published January 7, 2010.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed on April 5, 2010 in San Francisco, California.



Ricardo Ramirez