Appendix 5

Comments and Responses

5. Comments and Responses

The Draft Environmental Impact Report (EIR) for the Valley South Subtransmission Project was circulated for public and agency review from January 29, 2016 to March 14, 2016. A public meeting was held on Monday February 22, 2016 at the Residence Inn Marriott (25407 Madison Avenue, Murrieta). The public meeting provided an opportunity for questions and comments to be heard, although these comments were not recorded or entered into the formal record. Attendees were advised to submit all comments in writing. During the review period, comments could be submitted by email, fax, or US Mail. At the public meeting, a comment form was provided to facilitate the submittal of written comments.

A Notice of Availability (NOA) of the Draft EIR was filed with the Governor's Office of Planning and Research, State Clearinghouse (SCH Number 2015051012) and the County of Riverside, County Clerk (California Environmental Quality Act [CEQA] Guidelines §15087(d)) on January 29, 2016. A NOA letter was mailed to over 130 interested parties (CEQA Guidelines §15087(a)) and a NOA postcard was mailed to over 625 residences located within 300 feet of the proposed and alternative alignment (CEQA Guidelines §15087(a)(3)). Additionally, notices were published in three newspapers: The Press-Enterprise on January 30, 2016 and February 12, 2016, The Californian (An Edition of the UT San Diego) on February 12, 2016, and The Anza Valley Outlook on February 19, 2016 (CEQA Guidelines §15087(a)(1)). The newspaper notices included information on the proposed Project, where to obtain information on the EIR, and details regarding the public meeting. This level of notification exceeds the legal requirements of the CEQA Guidelines.

Per CEQA Guidelines Section 15132, the Final EIR shall consist of comments and recommendations received on the Draft EIR (verbatim or in summary); a list of persons, organizations, and public agencies commenting on the Draft EIR, and responses of the Lead Agency to significant environmental points raised in the review and consultation process.

This section presents responses to the comments received during the public review period for the Draft EIR. The California Public Utilities Commission (CPUC) received 45 comment letters/emails on the Draft EIR. Table 5-1 lists the agencies, organizations, and individuals that submitted comments. Each comment letter has been categorized as Agency (A), Organization (B), Individual (C), or Applicant (D) and numbered. The individual comments within each letter are also numbered; responses immediately follow each comment letter.

Several of the comments received on the Draft EIR requested or resulted in revisions to the document. These revisions have been incorporated into this Final EIR. These revisions are indicated as ~~strikeout~~ text for deletions and <u>underlined</u> text for new text.

Table 5-1. Commenters on the Draft Environmental Impact Report

Commenter	Submitted By	Date	Comment Set
Agencies (A)			
Eastern Municipal Water District	Maroun El-Hage, MS, PE, Senior Civil Engineer	02/05/2016	A1
City of Menifee Community Development Department	Ryan Fowler, Senior Planner (Postmark 03/31/2016)	03/14/2016	A2
Organizations (B)			
Blum Collins LLP	Craig M. Collins	03/14/2016	B1
Pechanga Band of Luiseno Indians	Anna M. Hoover, Cultural Analyst	03/14/2016	B2
Individuals (C)			
Angela D. Little		02/11/2016	C1

Table 5-1. Commenters on the Draft Environmental Impact Report			
Commenter	**Submitted By**	**Date**	**Comment Set**
Clyde Bacon		02/19/2016	C2
Kirk Douglas		02/23/2016	C3
Resident 1		02/23/2016	C4
Adam Jaramillo		02/24/2016	C5
Barbara Stevens		02/24/2016	C6
Matt Gordon		02/23/2016	C7
Madelyn Berson		02/22/2016	C8
Dan Long		02/23/2016	C9
Resident 2		02/23/2016	C10
Kathy Heckathorn & David Hidley		02/27/2016	C11
Sayegh Family		02/27/2016	C12
David McFarland		02/28/2016	C13
Clyde & Catherine Bacon		02/23/2016	C14
Resident 3		02/23/2016	C15
Susan Jolly		02/28/2016	C16
Paul Reasbeck and Family, Sssentago Family, and Flores Family		02/29/2016	C17
George & Celia Mohr		02/24/2016	C18
Resident 4		02/25/2016	C19
Chad Barley & Bridgit Mcginty		02/29/2016	C20
Melinda & Thomas Newburn		02/29/2016	C21
Cecilia Rubalcava		03/01/2016	C22
Paul and Alba Chassey		03/03/2016	C23
Harold Stovall		03/06/2016	C24
Jaime Corral		03/05/2016	C25
Syvret Warner		02/27/2016	C26
Jennifer Roane		02/28/2016	C27
Moses & Ruby Menchaca		03/04/2016	C28
Gary Tripodi		03/06/2016	C29
Frank & Donna Williams		03/13/2016	C30
Heather & Jeffrey Gagliano		03/13/2016	C31
Tina Heims (Postmark 03/11/2016)		03/01/2016	C32
Jacquelyn Can		03/13/2016	C33
Sheryl Saenz		03/14/2016	C34
Robert LaFond		03/14/2016	C35
Melissa Mohr		03/14/2016	C36
Ednalyn Kerr (Postmark 03/15/2016)		03/01/2016	C37
Jerred DeJang (Postmark 03/15/2016)		03/01/2016	C38
Melinda Y Hosley		03/14/2016	C39
Nahid Behnawa & Mohammad Abbass (Postmark 03/21/2016)		03/01/2016	C40
Applicant (D)			
Southern California Edison	Thomas E. Diaz, Regulatory Affairs Project Manager	03/14/2016	D1

Note: Individuals requesting that their personal information remain confidential are identified as "Resident". Personal information was provided as part of the original submittal, on-file with the CPUC.

Comment Set A1 – Eastern Municipal Water District

EASTERN MUNICIPAL WATER DISTRICT
SINCE 1950

February 5, 2016

Board of Directors

President
Randy A. Record

Vice President
David J. Slawson

Directors
Joseph J. Kuebler, CPA
Philip E. Paule
Ronald W. Sullivan

General Manager
Paul D. Jones II, P.E.

Treasurer
Joseph J. Kuebler, CPA

Chairman of the Board, The Metropolitan Water District of So. Calif.
Randy A. Record

Legal Counsel
Lemieux & O'Neill

Valley South Subtransmission Project
Draft EIR Comments
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

Subject: Valley South Subtransmission Project
Project Description: Construction of new 115-kilovolt subtransmission line (2 Segments)
Project Location: Menifee

Eastern Municipal Water District (EMWD) thanks you for the opportunity to review the Notice of Availability and Notice of Public Meeting for Southern California Edison (SCE)'s Valley South Subtransmission Project, as described in the attached public notice received February 1, 2016.

Once available, EMWD will request that SCE shall forward a Utility Notice providing preliminary plans to EMWD (Attn: Armando Arroyo, Senior Civil Engineer, Plan Check section, ext. 4480) to determine whether SCE's design is in conflict with EMWD's facilities. EMWD's Utility Conflicts staff shall coordinate with SCE staff from that point forward. **A1-1**

If you have questions or concerns, please do not hesitate to contact me.

Sincerely,

Maroun El-Hage, M.S., P.E., Senior Civil Engineer
Business Phone: 951-928-3777 Extension x4468
e-mail: El-hagem@emwd.org

ME:emn
Attachment

Mailing Address: Post Office Box 8300 Perris, CA 92572-8300 Telephone: (951) 928-3777 Fax: (951) 928-6177
Location: 2270 Trumble Road Perris, CA 92570 Internet: www.emwd.org

Responses to Comment Set A1

A1-1 Thank you for your comment. If the Valley South Subtransmission Project is approved, SCE will be required to coordinate with all directly affected landowners prior to construction (See MM LU-1). In addition, by inclusion of this comment letter in the Final EIR, SCE will have the correct contact information for any future coordination.

Comment Set A2 – City of Menifee Community Development Department

Scott A. Mann
Mayor

Greg August
Mayor Pro Tem

John V. Denver
Councilmember

Matthew Liesemeyer
Councilmember

Lesa Sobek
Councilmember

March 14, 2016

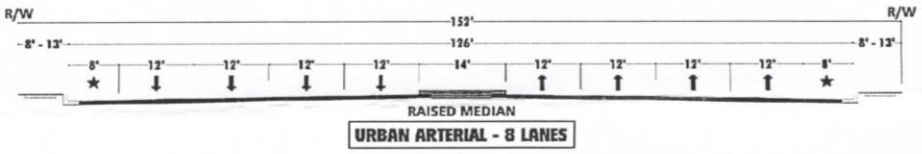
Valley South Subtransmission
Draft EIR Comments
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

RE: Southern California Edison Valley
South Subtransmission Project
SCH No. 2015051012

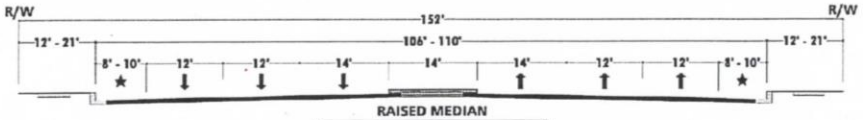
Dear Aspen Environmental Group:

Thank you for providing an opportunity for the City of Menifee Community Development Department to review the Draft EIR for the SCE Valley South Subtransmission Project (VSSP). Menifee's Community Development Department has reviewed the Draft EIR and has the following comments:

1. As previously requested in the City's June 4, 2015 NOP comment letter, SCE should take into consideration the recently approved (December 2013) City of Menifee Circulation Element when designing the power pole alignment within the City limits. The poles should be placed at their ultimate location per the City's Circulation Element roadway cross-sections. The poles should be located either within the right-of-way's parkway or completely outside of the public rights-of-way within a private easement, but they should not be placed within the ultimate planned pavement, curb, gutter, trails, or sidewalks. For your reference, Briggs Road is designated as a Major (4 lanes, divided) roadway, McLaughlin Road as a Collector / Interconnected Local (2 lane) roadways, Scott Road as an Urban Arterial (6 lanes, divided) roadway, and Menifee Road as an Arterial (4 lanes, divided) . Refer to the corresponding cross-sections below. **A2-1**

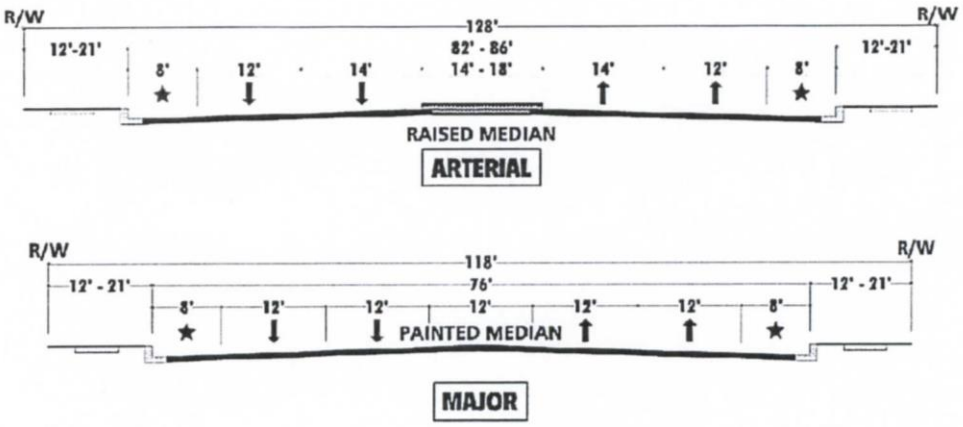


URBAN ARTERIAL - 8 LANES



URBAN ARTERIAL - 6 LANES

29714 Haun Road
Menifee, CA 92586
Phone 951.672.6777
Fax 951.679.3843
www.cityofmenifee.us



A2-1 Cont.

2. An encroachment permit shall be required for all improvements constructed within the City public right-of-way. **A2-2**

3. The City of Menifee would like to coordinate with SCE on the placement of individual poles to be proposed within the City's rights-of-way. **A2-3**

4. The City of Menifee Community Development Department requests to receive subsequent notices on this project and any environmental documents prepared for the project. **A2-4**

Thank you again for the opportunity to review the project proposal. Please forward any environmental documents and/or hearing notices regarding the project, to my attention at this office.

Sincerely,

Ryan Fowler
Senior Planner
Community Development Department

Responses to Comment Set A2

A2-1 Thank you for your comments. As stated in EIR Section B.3.5 (Right-of-Way Requirements), the proposed 115-kV subtransmission line route would be located within existing easements and public rights-of-way (ROWs) where SCE holds franchise rights; however, approximately 37 private properties/parcels would require new or upgraded land rights and/or agency permits as required.

A2-2 As stated in EIR Section B.4.7.1 (Subtransmission Survey), SCE would secure encroachment permits for trenching in public streets, as required. For conductor/cable installation (EIR Section B.4.8), it is also stated that SCE would work closely with the applicable jurisdiction to secure the necessary permits to string conductor over the applicable infrastructure. Additionally, Section B.4.13 (Construction Schedule) of the EIR states construction would commence following CPUC approval, final engineering, procurement activities, land rights acquisition, and receipt of all applicable permits. This would include an encroachment permit from the City of Menifee for all improvements constructed within the City's public ROW.

A2-3 The placement of individual poles within the City's ROWs would be determined during final engineering. As noted in Section C.11.2.3 of the Land Use Section, investor-owned utilities are exempt from local land use and zoning regulations under General Order No. 131-D. However, Section XIV.B requires public utilities to consult with local agencies. Under this order, SCE is required to consult with local agencies regarding land use issues, including the City of Menifee as appropriate.

A2-4 Ryan Fowler, Senior Planner, from the City of Menifee Community Development Department has been included on the mailing list since receipt of the scoping letter dated June 4, 2015. A hard copy of the Draft EIR was provided to the City for review. Any future mailings related to the environmental review process will be provided to the City.

Comment Set B1 – Blum Collins LLP

BLUM | COLLINS LLP

Aon Center
707 Wilshire Boulevard
Suite 4880
Los Angeles, California
90017

213.572.0400 phone
213.572.0401 fax

March 14, 2016

Valley South Subtransmission Project
Draft EIR Comments
c/o Aspen Environmental Group
5020 Cheseboro Road, Ste. 200
Agoura Hills, CA 91301
valley-south-project@aspeneg.com
Facsimile (888) 400-3930

Via Email & U.S. Mail

Re: *Comments on Valley South Subtransmission Project DEIR*

Dear Aspen Environmental Group and the California Public Utilities Commission:

Pursuant to the California Environmental Quality Act ("CEQA"), this is to provide comments for the SoCal Environmental Justice Alliance ("SEJA") regarding the Draft Environmental Impact Report ("DEIR") for the Valley South Subtransmission Project ("VSSP" or "the Project"), for which Southern California Edison ("SCE") is the Project Proponent. We understand the Project would involve (1) modifying SCE's existing Valley 500/115-kV Substation in Menifee to include, among other things, two circuit-breakers with 60-90 pounds of SF_6, a potent greenhouse gas, (2) constructing a new 115-kV subtransmission line approximately 12 miles in length, originating at SCE's existing Valley 500/115-kV Substation, and terminating at Leon Road and Benton Road, (3) reconductoring approximately 3.4 miles of existing conductor from Leon Road and Benton Road to just west of SCE's Triton Substation in the City of Temecula, (4) relocating distribution and telecommunication lines from old poles to new poles to support the installation of the new and replacement subtransmission line, (5) installing telecommunication equipment at Triton and Valley Substations to connect the proposed Project to SCE's existing telecommunications system, and (6) removing and replacing 230 wood poles and placing an unspecified number of new poles for distribution infrastructure. DEIR Executive Summary and Section A.1.1. We are uncertain if the Project also involves the modification in any way of the Triton substation in Temecula, but we note that at page B-18 (heading) you seem to suggest that more than one substation will be modified. We think the Project Description should be clarified.

B1-1

Project Description and Background

In Section A.3, Agency Use of This Document, you provide a table of permits the Project may require. You include a Clean Water Act section 404 permit but you do not address whether the Army Corps of Engineers ("USACE") will be required to consult with the USFWS under Section 7 of the federal Endangered Species Act in connection with that permit for potential impacts to the coastal California gnatcatcher ("CAGN"), the least Bell's vireo ("LBV"), the Southwestern Willow Flycatcher ("SWFL"), the Quino Checkerspot Butterfly ("QCB"), the Stephens' Kangaroo Rat ("SKR"), the vernal pool fairy shrimp and the Riverside fairy shrimp. You also do not address whether SCE will be required to consult with USFWS directly under Section 10. Such consultation (and the surveys that would be required to allow for that consultation) should have occurred prior to the development of this EIR. **B1-2**

At A-4 to A-5 you state that no local discretionary permits are required because the CPUC has preemptive jurisdiction over the Project. We understand this but have concerns with where that leaves SCE in terms of complying with the Western Riverside County Multi-Species Habitat Conservation Plan (the "WRCMSHCP"), as we discuss later. **B1-3**

At page B-17 you state that approximately 230 distribution wood poles would have to be replaced with transmission wood poles. It is unclear whether these replacements correspond to the 243 wood poles you identify in Table B-3 and on Figure B-1 or whether you are replacing 230 poles and placing an additional 243. Please clarify. **B1-4**

At page B-20 through B-25 you discuss Staging Areas and Work Areas, and you acknowledge there could be as many as six Staging Areas, and that Work Areas would require as much as 300 x 100 feet, and at B-26 you also mention access roads and spur roads, but when you get to Biological Resources, you only review a buffer of 250 feet from each side of the right of way ("ROW") for impacts. We are skeptical that all the work and access roads and spur roads will fit within this buffer. We are certain that the Staging Areas would not fit within the buffer as they range from 2.0 to 4.6 acres in size. You also apparently haven't analyzed the potential impacts of vegetation removal on access roads (or spur roads, which you don't really discuss in subsection B.4.3). **B1-5**

At B-30 you state "If restoration or revegetation were to occur within sensitive habitats, a habitat restoration and/or revegetation plan(s) would be developed by SCE with the appropriate resource agencies, and implemented after construction is complete." Later we believe you concede that such restoration is required and is part of the mitigation you must implement in order to ostensibly reduce impacts to a less than significant level – but it should occur as the Project is under construction as each portion of work is completed so as to not further damage the habitat and fauna that rely upon it. It is also apparent from Appendix 4, at page 4-2, that you do not intend to remediate as you go, which we believe will create significant impacts to the habitat and the species that need it. **B1-6**

At Figure B-8 on page B-33 you delineate the approximate location of 40 pull and tension sites, splicing sites and 31 guard structures. As you concede, this map is "not to scale" as each pull and tension site requires 300 by 100 feet, each splicing site requires 150 by 100 feet, and each guard structure requires 150 by 75 feet. As you indicate earlier, these sites may or will require vegetation removal and grading so there are habitat implications. Yet you do not attempt to correlate your map of these impacts with the habitat you have identified in the Biological Resources section of the DEIR. Unless you do this, it is impossible to tell what impacts the Project will have, what mitigation is necessary, and whether the Project will have a significant impact. At B-41, relating to the Guard Structures, you state that "A biological monitor would assist with [their] placement . . . to ensure impacts to special status resources are avoided to the extent feasible." This is not good enough. The analysis of where the impacts are to occur should have occurred in the DEIR. **B1-7**

At B-37 you concede that the Project would involve the disturbance of 193.5 *acres* of land with 179.3 putatively being restored. How, and again, when, that restoration occurs is of paramount importance. Repeatedly throughout the DEIR you state the Project would occur over 16 months but it is only in Appendix 4 that we learn that restoration activities would occur thereafter. **B1-8**

At B-55 you address electromagnetic fields ("EMFs"). You acknowledge that the International Agency for Research on Cancer ("IARC"), part of the World Health Organization ("WHO") and the California Department of Health Services have both classified – some time ago – EMFs as a possible carcinogen, and that a WHO report concludes that there is "a consistent pattern of increased risk for childhood leukemia." Despite this information you claim that there is no need to review this significant impact under CEQA because there is, you say, "no agreement among scientists that EMF does create a potential health risk." This is false, in light of the studies and conclusions you just quoted. You also claim there are no defined or "acceptable" standards under CEQA for evaluating the risk. In light of CEQA's mandatory finding of significance under Appendix G, Section XVIII.C, "Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?," a Project like the present one requires you to seek out the standards that are available for analyzing the risk. For example, you could have used the standards from the International Commission on Non Ionizing Radiation Protection ("ICNIRP") for public exposures as they apply for exposures to the public in the EU. Those standards, for a frequency of 60 Hz, are 5,000 V/M (volts per meter), and 200 μT for magnetic fields. You could have evaluated whether the Project will comply with the ICNIRP standards and you should have evaluated whether the exposures present a risk to human health, including children who live along the transmission (and distribution) line route. **B1-9**

Aesthetics

Initially, we do not understand the basis for your choice of Key Observation Points ("KOPs"). Please explain the grounds on which you chose those points and not others or more. **B1-10**

Key Observation Point #2: Domenigoni Parkway at Leon Road. You initially concede that the visual impacts to this observation point are moderate to high, leading to a significant impact. However, then you approach the matter with a "Linear Viewpoint Analysis" by which you argue that "the extent of roadway most impacted . . . is limited to the immediate approaches to the proposed Project span of Domenigoni Parkway, (approximately 0.25 miles or less, on either side of the span)." You claim that these segments represent a small proportion of the total affected travel distances "with view durations potentially lasting 11 to 13 seconds." First this unreasonably assumes perfect traffic conditions on Domenigoni Parkway. Second, you are assuming a proportion of travel time based on a hypothetical length of travel from eastbound to westbound – and you calculate in travel time *away from the structures* when they are not even visible. This is highly arbitrary. The view of the structures is highly prominent based on a comparison of Figures C.2-3a and C.2-3b. **B1-11**

Key Observation Point #4: Leon Road at Fowler Drive depicts (in Figures C.2-5a and b) taller, more prominent poles with triple-tiered rather than double tiered wires. Against the largely rural backdrop you concede that the overall visual sensitivity is moderate to high. Yet when you get to an analysis of the impact you say it is not significant. We believe you are still significantly impeding a viewshed. **B1-12**

Key Observation Point #5: Lantana Way at Leon Road, you concede would have a high visual sensitivity, as there would be completely new poles within a residential subdivision in which all utilities are presently undergrounded. **B1-13**

Key Observation Point #6: Westbound SR79 at Max Gillis Blvd., depicts significantly taller and more prominent equipment; you concede the number of viewers would be high and the duration of the view of the poles would be extended due to the openness of the landscape. You concede that the overall sensitivity is moderate to high. When you analyze the impact of the Project you contend that the impact is not significant because of "the attenuation of the incremental visual impact achieved by the existing facility, without which, the resulting incremental impact would be substantially greater." While the impact would be greater if there were no facility there at all, the impact from the increased pole height and increased wiring would still be significant. **B1-14**

At C.2-27, with regard to Criterion AES-3 (which corresponds to CEQA Guidelines Appendix G, Section I.a), Would the Project have a substantial adverse effect on a scenic vista?, you argue that there are no *officially designated* scenic vistas, therefore there is no substantial adverse effect. This is not in keeping with the Guidelines, which only talk about "scenic vistas," and do not limit themselves to officially designated vistas. Though **B1-15**

your aesthetics analysis is limited to a very few Key Observation Points, the ones identified above are significantly impacted. **B1-15 Cont.**

Cumulative Impacts. You concede that the construction of the Project, in combination with the potential construction of other projects at the same time, could lead to significant cumulative visual impacts. Your list of cumulative projects, at Table C.1-1, makes it difficult to determine if this will occur, as only one of the many projects has an anticipated construction schedule. We think it is highly likely to occur, however, given that Project construction and cleanup are scheduled to go from March 2018 to November 2019 (*see* Appendix 4 at 4-2). You claim that the cumulative visual impacts from your own construction would be limited to a less than significant level by screening of the construction equipment. First of all, this would only occur when the construction equipment was in the Staging Areas between the hours of 6 p.m. and 6 a.m. Second, this screening, even during those times, would not limit the impacts of the Project construction upon the viewsheds. The equipment is still visible within the Staging Areas. **B1-16**

Regarding the cumulative impacts of operation of the Project upon views, you consider two projects only: a celltower (cumulative project 24) and the replacement of a tubular steel pole and reconfiguration of a subtransmission line (cumulative project 37). First of all, you should have considered the other projects and their impacts on the viewshed. Specifically, you should have considered increasing urbanization of the landscape combined with the Project, which will result in significant impacts. Second, the two projects you do consider could have significant impacts in combination with the Project. **B1-17**

Impact and Mitigation Summary. At Table C.2-3 you concede that the long term presence of the Project would result in adverse significant and unavoidable impacts at *two* locations where the Project is placed in a new alignment. Unfortunately the DEIR only discusses, apparently, one of these. We cannot tell but it appears that you revised the DEIR to eliminate the discussion of one of the impacts you previously deemed significant. This is not in keeping with CEQA's information disclosure and public participation requirements. Also, you have not provided photos of KOP #10 along the alternative route. **B1-18**

Agriculture

With regard to Criterion AG-1, Would the operation of the Project permanently convert Farmland to a non-agricultural use?, you assert that the Project would lead to permanent disturbance of 0.38 acres of Prime Farmland and 0.17 acres of Farmland of Statewide Importance as well as 5.36 acres of Farmland of Local Importance and .01 acres of Unique Farmland. You claim this is not a significant impact because "the total permanent disturbance area is less than the minimum area necessary for sustainable agriculture and less than the minimum DOC [Department of Conservation] mapping unit." DEIR at C.3-11. The level of the DOC mapping unit is not relevant when considering significant impacts and cumulative impacts. The Project, particularly in combination with other projects, would lead to significant cumulative losses to Farmland, **B1-19**

and it would remove an obstacle to the growth of residential development in the community, which, as you acknowledge elsewhere in the DEIR, is replacing the agricultural character of the area. **B1-19 Cont.**

Criterion AG-3 asks whether the Project could result in the conversion of land under Agricultural Preserves to non-agricultural uses. It will, as you acknowledge, in the amount of 0.79 acres. You conclude that this is not significant because this is a "negligible" amount of land. Again, in combination with other projects, this Project will have a significant cumulative impact. **B1-20**

Air Quality

At C.4-10 you contend that you are not subject to the South Coast Air Quality Management District's ("SCAQMD's") additional requirements under Rule 403 because you are not disturbing 50 or more acres of surface area. But you previously conceded that you are actually disturbing 193.5 acres. We believe the requirements which include a dust control plan should apply. **B1-21**

With regard to impact AQ-3, would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?, you concede that the Project would exceed SCAQMD's regional threshold for PM_{10}. You claim that NO_x and PM_{10} emissions can be further reduced by limiting vehicle speeds on unpaved public roads to 25 mph and by using CARB Tier 3 engines for all off-road equipment at 50 horsepower or greater (although you grant SCE a number of exceptions from this mitigation measure). If reducing vehicle speeds on unpaved roads to 25 mph is actually a mitigation measure, we wonder how fast they were going in your models beforehand? This is impossible to tell from your calculations including Table 37 in Appendix 2. As a whole, the DEIR is deficient for not disclosing its modeling assumptions – they should be in the DEIR, not the appendices, and they are in neither. **B1-22**

Concerning impact AQ-4, you provide Table C.4-10. It is impossible to determine how you derived the Local Significance Thresholds ("LSTs") in this Table. Please explain. You further contend that PM_{10} emissions would be reduced from 6.50 lbs/day to 2.74 lbs/day. On what bases did you reach this conclusion? Again, this information should have been in the DEIR, not the Appendices, and it is in neither. **B1-23**

As to impact AQ-5, the Project's construction emissions could exceed SCAQMD Toxic Air Contaminant Health Risk Significance Thresholds, you did not do a Health Risk Analysis ("HRA"). You claim that the Project's TAC emissions would be well below the SCAQMD significance thresholds shown in Table C.4-6, but there are no thresholds shown there. While the Project is of relatively short duration it can have significant impacts on sensitive receptors adjacent to it. **B1-24**

Cumulative Impacts. You state under "Existing Cumulative Conditions" that air quality has improved. This is not true with regard to PM_{10} emissions which have remained relatively constant throughout the basin – and the Project will contribute to those emissions. Concerning Criterion AQ-2, would the Project in combination with other projects contribute substantially to an existing or projected air quality violation, you say in a conclusory fashion that it would not. On what basis? The construction of other projects in combination with the Project could easily lead to exceedances of PM_{10} and NO_x. You have done no analysis of this. On Criterion AQ-3, whether the Project and other projects would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, you admit that SCAQMD regional thresholds are often used to assess cumulative impacts for other projects in a one-mile radius. "However," you state, "given the Project's emissions are low at any one location during the construction of this linear Project, and that emissions from the Project and any other large cumulative projects would have to comply with SCAQMD rules and regulations, and likely be the subject of additional mitigation measures, it is determined that the Project would have less-than-significant cumulative emissions impacts." Given that you have not done a regional analysis with any of these other large construction projects, and given that your project would exceed both regional and local emissions thresholds in the absence of mitigation, we see no basis for your conclusion.

B1-25

B1-26

B1-27

Similarly, regarding Criterion AQ-4, exposure of sensitive receptors to substantial pollutant concentrations, you assert that "None of the known cumulative projects would have large amounts of concurrent and adjacent air pollutant emissions to the Project's construction sites," and that "Therefore, it can be assumed that the potential for cumulative impacts to sensitive receptors is the same as the Project impacts to sensitive receptors." This is baseless. We can assume that these projects include a number of large construction projects. When we look at the map of your cumulative projects, at Figure C.1-1, it is clear that a number of these projects are close together in addition to being close to the Project. And since projects 2 and 19 on that list are apparently the same project and are at a significant distance from each other, they clearly cover a large area and will have significant impacts. It is your duty under CEQA to investigate impacts rather than make conclusory assertions that none of the other projects will have impacts cumulative to the present one. Indeed, the projects selected on your list and mapped at Figure C.1-1 were chosen because they *were* likely to be concurrent. Your analysis reflects a failure to proceed by law and is not based on substantial evidence.

B1-28

Biological Resources

At C.5-3 you indicate that the surveyed area extended 250 feet from either side of the centerline of the proposed Project. This is hardly conservative. What about the access roads, spur roads, laydown areas, and staging areas? They are not reflected in your map and apparently were not surveyed.

B1-29

You concede at C.5-3 to C.5-8 that there are large pockets of coastal sage scrub habitat along the line of the Project (which is considered very threatened habitat) and that in the

southern half there is a large freshwater marsh, and that there are non-native grasslands. At C.5-9 you list the jurisdictional waters present on the Project sites. We note that these delineations are *not* the same as those identified by SCE in its Proponent's Environmental Assessment ("PEA"). You further note that the Project covers regions of Freshwater Marsh and Southern Willow Scrub, of which there are between either 6-20 existing occurrences or between 1,000 and 3,000 individuals, which are considered very threatened. DEIR at Table C.5-3.

You state that the Project covers instances of the San Diego ambrosia, and that it is in the critical habitat for that species. You also state that additional rare plants at the Project sites include the long-spined spineflower and the smooth tarplant. Though they were not observed in surveys, you noted there was a high potential for the occurrence of the federally endangered and state threatened Munz's onion, the California Rare Plant Rank 1B.1 Parry's spineflower, and the California Rare Plant Rank 1B.1 round-leaved filaree.

With regard to special status invertebrates, you noted that habitat for the Quino Checkerspot Butterfly ("QCB") was present, and that though none were sighted during surveys, the likelihood of their presence was high. Mapped critical habitat for the QCB is within 3 miles of the Project. You also indicated that the chance for the occurrence of the federally threatened vernal pool fairy shrimp was high. As to reptiles, you indicated that 3 special status species were observed and others were known to be in the vicinity of the study area. Concerning amphibians there was one special status species seen and one likely to occur.

Regarding birds, you indicated that the federal- and state-listed least Bell's vireo ("LBV") was documented in both 2012 and 2014, as well as the coastal California gnatcatcher ("CAGN"), even though SCE did not survey for it, as well as the burrowing owl, and the white tailed kite and golden eagle, two fully protected California species. Mapped critical habitat for the CAGN is within 3 miles of the Project. You indicated that protocol surveys were done for the southwestern willow flycatcher ("SWFL"), and that a state-endangered willow flycatcher ("WFL") was documented. Additionally you indicated that the following species were documented as present:

Species of Special Concern	**CDFW Special Animals**
Tricolored blackbird	Great egret
Southern California rufous-crowned sparrow	Great blue heron
Northern harrier	Costa's hummingbird
Horned lark	Snowy egret
Prairie falcon	Nuttall's woodpecker
Yellow-breasted chat	Allen's hummingbird
Loggerhead shrike	Lawrence's goldfinch
Yellow warbler	

Regarding mammals, you related that 12 Stephens' kangaroo rat ("SKR") were detected in trapping events between 2012 and 2014, and that the following Species of Special Concern and MSHCP species were present: the San Diego black-tailed jack rabbit, San Diego desert woodrat, northwestern San Diego pocket mouse, and Los Angeles pocket mouse. Also present was the CDFW Species of Special Concern, the southern grasshopper mouse. Additional species among a "suite" of species you indicated could be present include the pallid bat, the western mastiff bat, the hoary bat, and the American badger.

You also acknowledged that the California Missing Linkages Project ("CMLP") has identified an at-risk habitat linkage area that crosses Leon Road, just north of Baxter Road, in the Survey Area.

Under Regulatory Framework you discussed the MSHCP and the fact that 153,000 acres were to be assembled from the Criteria Area identified in that Plan, but you did not indicate whether the Project falls within the Criteria Area. This information should have been in the DEIR. We found it in the PEA: it does.

B1-30

At Table C.5-6 on pages C.5-47 and -48, you list a number of applicant proposed measures ("APMs"). We agree that these APMs are insufficiently specific and not legally enforceable and thus you must achieve mitigation for significant impacts through the mitigation measures you seek to impose.

At C.5-51, you acknowledge that construction of the Project over a period of sixteen months is not a timeframe considered temporary for impacts to plants and wildlife. "However," you assert, "due to the linear nature of the proposed Project construction would not remain in any one location for extended periods of time." This begs the question of when and how restoration will occur. You have suggested (in your alternatives analysis Appendix) that restoration will not occur until after the Project is complete. This is unacceptable and inadequate mitigation. Restoration, when necessary, should occur as each construction site is left.

B1-31

At Table C.5-8 on page C.5-51, you reflect "Approximate Impact Acreage for Additional Project Components." We have no idea how this Table relates to Table B-7, which reflects that a total of 193.5 acres are to be disturbed and 179.3 acres are to be restored.

B1-32

Impact BIO-1 (Criterion BIO1): Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by CDFW or USFWS? At C.5-52 you say that there will be a total of 0.20 acres permanent impacts and 6.16 acres of temporary impacts to riparian habitats or sensitive natural communities. We don't know how you reached this conclusion without mapping the impact areas mentioned above relative to the habitat in question, and this information should have been contained in the DEIR. As it is, we are unable to discern whether you are referring here simply to riparian communities or also to coastal sage scrub, and we have tried to discern this using your Table C.5-9 to no avail.

B1-33

You acknowledge that vegetation removal and soil disturbance can result in 50 to 300 years for partial recovery of vegetation communities, that fugitive dust can kill plants by burial and abrasion and that it can interrupt natural processes of nutrient accumulation, that up to 80% of Southern California vertebrate species rely on riparian habitats for at least part of their lifecycle, and that even a small permanent loss of riparian habitat is therefore a significant impact. You claim that Mitigation Measures ("MM's") BIO-1 through -5 will mitigate this impact to less than significant levels. We'll address those MM's below, because they are not adequate as to other impacts that the Project will have, but the main point is that you plan to mitigate only for the "permanent" impacts to habitat when your "temporary" impacts will be all but permanent anyway. **B1-34**

You also acknowledge that the site contains California annual grassland, which provides habitat to a variety of sensitive species including the SKR and burrowing owl. It is *not* clear at all that you are including this habitat in your calculation of impacts or your plans for remediation. **B1-35**

MM BIO-1 is a Worker Environmental Education Program. While your goals of informing employees and contractors of laws that protect species are laudable, we do not think that you can rely on these workers to recognize the species protected by those laws – a feat it takes biologists years to accomplish. And protocols regarding road kill hardly mitigate impacts: they merely help assure the reporting of impacts that have already occurred. Moreover, you are allowing the workers to work for five days before they have had the training, so even if they were trained to recognize the species subject to impacts that training may come too late. **B1-36**

MM BIO-2 calls for the implementation of various Best Management Practices. The first of these is the creation of an annual report. We do not know what good this will do for a Project to be implemented over sixteen months; it is far to infrequent. Second, you intend that prior to ground disturbance the area to be disturbed would be delineated by stakes. Unless there is a biological monitor surveying the staked areas and identifying alternative locations when avoidance is appropriate, we do not know what good this will do. Third, you indicate a speed limit of 15 miles per hour throughout the VSSP site. You previously indicated that a speed limit of 25 miles per hour would be permissible on unpaved public roads. We agree that a 15 mile per hour limit will reduce impacts but want to assure that it will be implemented. Fourth, you provide that no vehicles should be refueled within 100 feet of an ephemeral drainage or wetland. This should be the end of it, but you go on to say "unless a bermed and lined refueling area is constructed." SCE should not be parking in these areas – they can and should be avoided. Fifth, you state that all general trash should be stored in animal-proof containers or removed daily. It should be removed daily. Sixth, you say all chemicals, fuels, lubricants and biocides should be used pursuant to all state, federal and local requirements. Under CEQA, this is not a mitigation measure, it is a restatement of existing law. It adds nothing. You say the use of rodenticides is "restricted." The use should be prohibited: they are highly likely to impact sensitive species, such as the SKR, the San Diego desert woodrat, the Los Angeles pocket mouse, and the northwestern San Diego pocket mouse could be affected. **B1-37**

Seventh, you say all special status animals found injured or killed should be reported. We agree this should happen, but your other mitigation measures need to be robust enough such that they are not found injured or killed, and they are not. (Additionally, again, we don't see how you can rely on workers to identify special status species relative to other species, so we don't see how this requirement would be implemented anyway.) Eighth, you provide that site disturbance and construction activities should not occur before dawn or after dusk. This requirement makes sense, but you elsewhere provide that these activities can go on with lighting, so we question whether it will be implemented. Ninth, you provide for flagging of sensitive vegetation communities. Since you elsewhere provide for flagging of *areas to be disturbed*, we find this requirement very concerning. Sensitive communities need to be flagged for avoidance in a different and readily recognizable manner. And obviously, though you haven't said it, one of the biological monitors needs to mark them as construction personnel can't be expected to recognize them. Tenth, you state that workers shall allow sensitive wildlife to escape from holes and equipment, and that they shall be removed by a qualified biologist. Again, since the workers cannot be relied upon to identify a sensitive species from any other one, this will have to happen every time an animal is entrapped.

B1-37 Cont.

MM BIO-3 calls for compensation for *permanent* impacts to sensitive vegetation communities. It says there will be restoration pursuant to the Habitat Restoration and Monitoring Plan per MM BIO-4. Obviously, this measure only calls for restoration regarding *permanent* impacts. This excludes the *temporary* impacts to the (anticipated) 6.16 acres of habitat and addresses only the 0.20 acres of permanent impacts. This is not adequate. You've already acknowledged that disturbance to vegetation can take between 50 to 300 years for partial recovery, and that full recovery can take 3,000 years. Moving on, you state that prior to disturbance a qualified biologist shall identify the community type and acreage that shall be disturbed. You state that there will be a 3:1 revegetation for *permanent* impacts to riparian vegetation and a 1:1 revegetation for other types. You state that there should be payment to the MSHCP and documentation of payment. Since not all sensitive vegetation on the Project site is protected by the MSHCP, this is not adequate at all. *You have not provided for remediation to "non-sensitive" California annual grasslands although you acknowledge that they provide habitat to the SKR and burrowing owl.*

B1-38

Under MM BIO-3 you then set out Compensation Land Selection Criteria. Presumably you intend these Criteria to apply if SCE does not become a PSE with the MSHCP, but you haven't made this clear. We think in light of the significant impacts the Project will have that both should be contemplated. Additionally, the criteria by which you identify entities for conservation easements for mitigation lands is not in keeping with the CDFW's criteria under Government Code section 69567. CDFW has only approved a select few agencies and they are listed at https://www.wildlife.ca.gov/Conservation/CESA/Endowments. Further, you appropriately specify that SCE shall pay for the establishment of the conservation easement and that it shall pay funds in the form of a non-wasting endowment to cover the

B1-39

cost of monitoring and enforcing the terms of the easement *in perpetuity*. This is a serious commitment and the terms of it need to be specified in the DEIR. **B1-39 Cont.**

MM BIO-4 states that SCE will develop a Habitat Restoration and Monitoring Plan to restore temporarily disturbed areas to preconstruction conditions or better. However, it apparently won't be implemented until after the Project is totally finished, which means that the wildlife that depends on that habitat could be without it for years – a largely permanent impact. **B1-40**

MM BIO-5 states that no more than 30 days prior to ground disturbance SCE shall hire a qualified biologist to monitor construction. While this is helpful it is not sufficient when the biologist does not have the power to mandate avoidance of sensitive and necessary habitat. **B1-41**

Criterion BIO2: Would the Project have an adverse effect either directly or through habitat modification on any species listed as endangered or threatened or proposed or critical habitat for those species? Impact BIO-2: The Project could cause the loss of foraging habitat for wildlife. We believe your impact determination here is sparing, to put it lightly. The habitat proposed to be lost is not merely foraging habitat but also breeding habitat and habitat needed for other elements of the life history of the species impacted. You acknowledge this under your "foraging" habitat heading. And you quickly conclude that "Due to the temporary nature of the impacts and the availability of foraging habitat in adjacent areas, the loss of foraging habitat for wildlife resulting from the construction of the VSSP would be considered less than significant." We think this conclusion is baseless. Again, it isn't merely foraging habitat. And as you state earlier the impacts won't be temporary – it may take from 300 to 3,000 years for the habitat to recover from its eradication (through devegetation and grading). You also state that the new structures constructed as part of the VSSP "may actually provide additional perches, refugia, and increased access to some prey, for species such as Cooper's hawks and kestrels." This leaves out two points. One is that there will be a permanent negative impact not subject to mitigation to the species preyed upon such as the SKR, the San Diego desert woodrat, the Los Angeles pocket mouse, and the northwestern San Diego pocket mouse. Second, you have omitted mention of the electrocution of avian species perching on structures. The Avian Power Line Interaction Committee ("APLIC") *Suggested Practices for Avian Protection on Power Lines: The State of the Art 2006* acknowledges that even with implementation of its measures, there will be avian electrocutions, particularly of golden eagles. All of these are not insignificant impacts – particularly not cumulatively with other projects, which the VSSP will contribute to with its provision of reliable electricity. **B1-42**

Impact BIO-3: The Project could result in disturbance to nesting birds and raptors. You acknowledge that the increased noise from the Project "would likely temporarily alter and/or preclude the breeding activities for many common and sensitive bird species known to occur along the proposed Project route." You state that "when possible, construction and maintenance activities would occur outside the recognized breeding **B1-43**

season (generally February-September [as early as January for some raptors])." We have a high degree of skepticism as to the veracity of this statement given your planned Project schedule – from March 2018 to July 2019. According to your projections from SCE, it simply cannot wait to implement this Project. Moreover, you have not included this supposed waiting period in any Mitigation Measure. It is not enforceable. Thus, it is simply misleading to tell the public and agency decision-makers that SCE will not be doing construction in sensitive areas during this time period.

B1-43 Cont.

You rely on MM's NOI-2 (BMPs for Noise – specifically, mufflers, which are hardly adequate for the bird species, which can be impacted with noise of 45 dB or higher, when you've admitted in your noise section that the noise levels will be in the range of 75 to over 80 dBA), BIO-1 (the Worker Environmental Education Program), BIO-2 (the BMPs), BIO-4 (the Habitat Restoration and Monitoring Plan), BIO-5 (Biological Construction Monitoring), as well as BIO-6 and BIO-7 specifically relating to nesting birds. At the outset, none of these measures other than BIO-6 and -7 can really limit impacts to nesting birds.

B1-44

Regarding MM BIO-6, you indicate that the avian biologist shall monitor nests and provide reports to "the appropriate resource agencies." You have not specified them here. They should include the USFWS and the USACE should be seeking a Biological Opinion from the USFWS due to impacts to waters of the United States or SCE should be obtaining a permit under Section 10 of the federal Endangered Species Act directly. All of this should have occurred prior to your CEQA review, as the public is entitled to know the impacts to the endangered and threatened species on-site.

B1-45

MM BIO-7 provides for a Nesting Bird Management Plan to be prepared by SCE in coordination with the CPUC, CDFW and the USFWS. You say this Plan will include a notification procedure for reduction in buffers from the 300 feet for nesting birds and the 500 feet for raptors you provided for in MM BIO-6. Those buffers are the minimum necessary and there should be no reduction. MM BIO-7 also provides for noise monitoring near nests and states that noise levels should not exceed 8 dBA greater than ambient noise levels or 70 dBA, whichever is greater. 70 dBA is a level significantly higher than that which you previously acknowledge is a level at which birds will be affected. This is not adequate mitigation to reduce impacts to less than significant levels.

B1-46

Impact BIO-4: The Project could result in disturbance to wildlife in adjacent habitat. Here you acknowledge that "While there would be no direct impacts to adjacent habitat, indirect impacts from the VSSP would include fugitive dust, increased noise levels . . . light impacts from construction during low-light periods, alterations to existing topographical or hydrological conditions, including erosion and sediment transport, and the establishment of noxious weeds." You claim these impacts will all be mitigated to less-than-significant levels through MM's BIO-1, BIO-2, BIO-5, BIO-6, BIO-7, and NOI-2. You conclude that this would minimize impacts to *nesting birds and raptors* "to the extent possible." However, the impacts you identify will be to far more than nesting birds and raptors. Additionally, elsewhere in your Mitigation Measures you have claimed

B1-47

that you will be *prohibiting construction* during low-light periods. Your statement to the contrary here does not induce confidence.

B1-47 Cont.

Impact BIO-5: The Project could disturb nesting WFL, SWFL, LBV, or their habitat. You concede these impacts would be significant. The LBV and SWFL are federally listed as endangered; the WFL, state listed as endangered, has also been present. Again, you state "Construction activities will be conducted outside the recognized breeding season to the extent possible," and again, although you have at least included a statement to that effect in MM BIO-8, we disbelieve you for the reasons stated above.

B1-48

In MM BIO-8 you state that if suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain to the appropriate take authorizations or permits. These authorizations should have been sought prior to CEQA review. You say take of habitat and incidental take of species may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP. You say MM BIO-3 will compensate for impacts to habitat by requiring restoration, creation or acquisition of lands containing riparian habitat and that "no further compensation is required." MM BIO-3 by its terms only applies to "permanent" impacts to habitat, and your temporary impacts will be, in effect, permanent as well if not remediated. And you have not acknowledged that interference with habitat during the breeding season, whether it is remediated later or not, is a significant impact. The specific mitigation should have been arranged *before* the DEIR was circulated.

B1-49

You continue, "If VSSP-related activities are scheduled to occur during the breeding season (February through September), SCE shall have a qualified and permitted avian biologist, approved by the CPUC, conduct protocol surveys in suitable habitat within 500 feet of disturbance areas," and that SCE shall conduct focused protocol surveys in known occupied habitat within 500 feet of the VSSP. You state that these surveys shall be conducted within *one year* prior to the start of construction and shall continue "annually" until the completion of construction and restoration activities. Birds are highly mobile. These surveys need to occur within 3 days of construction at a given site, otherwise they are of extremely limited use. You provide that "No construction or vehicle traffic shall occur within nest buffers" of 300 feet. It should provide that no people are permitted within nest buffers (other than, perhaps, the qualified avian biologist).

B1-50

Impact BIO-6: The Project could disturb CAGN, or their habitat. You state that the Project will permanently impact 0.19 acres of coastal sage scrub and temporarily impact 3.93 acres, and you acknowledge that CAGN, including fledglings, were detected during both protocol and general biological surveys within the VSSP site.[1] Again, the impact

B1-51

[1] We note that the PEA states in section 4.4 that "For Segment 2 of the proposed Project, protocol surveys were not conducted because the WRCMSHCP considers this species 'adequately conserved.'" A CAGN was detected in Segment 2 despite the absence of protocol surveys. DEIR at C.5-68. We have searched the MSHCP in vain for a statement that the CAGN is "adequately conserved." The Species Account for the CAGN within that document provides old estimates that there were between 261 pairs

areas should have been mapped and made available to the public, since it is obvious you did this for yourself in reaching conclusions regarding the potential impacts to this species. You concede that impacts to the CAGN or their habitat would be significant. You conclude that these impacts would be mitigated to less than significant levels by MM's BIO-9 (requiring protocol surveys for the CAGN) as well as BIO-3, BIO-1, BIO-2, BIO-4, BIO-5, BIO-6, and BIO-7. MM BIO-3 only requires mitigation for *permanent* impacts to habitat, at another site, and will not occur in time to mitigate impacts to nesting or breeding CAGN. We've already discussed BIO-1, BIO-2, and BIO-4 through -7, and those comments are applicable here. Regarding MM BIO-9, protocol surveys should have been conducted through the length of the VSSP already and should have extended for a minimum of 500 feet on either side, not 250 feet. You provide for further surveys within a year prior to the start of construction, but they should be within 3 days of construction activity. Again, you provide there should be 300 foot buffers with no construction or vehicle activity, but these buffers should exclude people other than possibly the qualified biologist.

B1-51 Cont.

Impact BIO-7: The Project could result in injury or mortality to the QCB, or disturbance of its habitat. You indicate that the larval host plant for the QCB, the dot seed plantain, was observed in numerous locations in the proposed Project area. You indicate that the VSSP would permanently impact 0.49 acres and temporarily impact 19.07 acres of grassland and coastal sage scrub, which have the potential to support the dot seed plantain. Again, you did some mapping here which was not made available to the public or agency decision-makers in connection with this CEQA review; this is inappropriate. You state that MM's BIO-10 and BIO-11 will reduce this impact to less than significant. You state that if SCE becomes a PSE in the MSHCP, then additional measures beyond those described in the Mitigation Measures may be required. These additional measures should have been specified here; CEQA is meant to allow the public to review the impacts and proposed mitigations of a project.

B1-52

MM BIO-10 provides for protocol surveys for the QCB and avoidance of suitable or occupied habitat. You state that "If suitable habitat cannot be avoided, SCE shall consult with the USFWS and obtain appropriate take authorizations and permits. SCE shall also implement any conservation measures contained within these permits." The need for consultation should have been identified *prior* to CEQA compliance. You have already identified the areas for impact because you have specified the acreage of the habitat to be impacted permanently and temporarily. The results of your consultation should have been part of the DEIR. Also, the MM does not indicate when you intend to do further surveys, and it has no prohibition on construction prior to conducting the surveys or consultation.

B1-53

MM BIO-11 provides for compensation for impacts to QCB suitable habitat. You state that creation or restoration of habitat shall be required at a 1:1 ratio for all *permanent*

B1-54

within all of Riverside County (1993) or 300 pairs in Western Riverside County (1996). The MSHCP assigns this species to Group 2.

impacts to habitat within the VSSP site. Again, "temporary" impacts to habitat, as you define them, can also be permanent, as they can require 50-300 to 3,000 years for recovery. You don't specify when this remediation will occur, and it obviously will not be sufficient for existing populations of the QCB.

B1-54 Cont.

In short, your Mitigation Measures do not reduce impacts to a less-than-significant level.

Impact BIO-8: The Project could result in injury or mortality of vernal pool or Riverside fairy shrimp, or disturbance of their habitat. You previously indicated in the DEIR that the chance of the presence of the shrimp was high, although neither were detected during earlier surveys. You claim that MMs BIO-12 through -14, as well as MMs BIO-1, -2, and -5, would mitigate these impacts to a less-than-significant level.

MM BIO-12 states that SCE is to conduct protocol surveys for the shrimp "each year of construction in areas subject to Project disturbance," in compliance with the USFWS Interim Survey Guidelines to Permitees for Recovery Permits under Section 10(a)(1)(A) of the Endangered Species Act (ESA) for Listed Vernal Pool Branchiopods. As you should know, the surveys require a permit and require at least a year to implement, because both a wet season and dry season survey (or two consecutive wet season surveys) are required. If it is a dry year, the MM should provide that the survey must wait another year.

B1-55

MM BIO-13 requires avoidance of seasonal depressions and known waterbodies that have been verified or have the potential to become occupied by the listed fairy shrimp. You provide for a 100-foot buffer and a 250-foot buffer if the shrimp are detected. We believe the shrimp or their cysts may be present without your detecting them. You state that if avoidance is not possible, consultation with the USFWS will be necessary. This is a significant impact which is not mitigated and which should have been acknowledged in the DEIR.

B1-56

MM BIO-14 provides for compensation to listed fairy shrimp habitat should consultation become necessary. We do not believe preservation and creation mitigate impacts to existing, occupied habitat to less-than-significant levels.

B1-57

Impact BIO-9: The Project could result in injury or mortality of SKR. You indicate that 12 SKR were detected throughout the range of the VSSP in 2012 and 2014 in small mammal trapping events. You concede that the Project could result in direct mortality to SKR or crushing of their above-ground seed storage, in disrupting their paths and trails, and in light impacts due to early morning or nighttime construction (though you previously indicated that you would not do this in a mitigation measure). You also concede that the placement of poles will lead to greater roosting opportunities for predators. You rely primarily on MMs BIO-15 and BIO-16 to reduce impacts to less than significant. You state that if SCE becomes a PSE in the MSHCP or the RCHCA HCP for the SKR, additional measures may be required, but you don't specify them. This level of inquiry should have occurred prior to the preparation of the DEIR.

B1-58

MM BIO-15 provides that no greater than 30 days prior to ground disturbance, SCE shall retain a qualified biologist to conduct preconstruction surveys. Since the Project will last at least 16 months, such surveys over some of the span of the Project will contain extremely stale information. Surveys should occur within 30 days in each area subject to disturbance. You state that if active SKR burrows or precincts are present, they shall be flagged with a 100-foot buffer and that there shall be no work in the setback areas. Please explain why this is an adequate buffer. You then state that if SCE determines that construction activities will be required within the setback area, it will need a Biological Opinion from CDFW and USFWS, but that take may be allowed if SCE joins the MSHCP or the RCHCA HCP for the SKR. Again, please explain why this is an adequate buffer to not allow take. You should have identified habitat potentially subject to disturbance and conducted consultation if necessary prior to the preparation of the DEIR.

B1-59

MM BIO-16 provides for compensation for permanent impacts to the SKR, only if construction occurs within 100 feet. You provide that SCE may acquire lands subject to a conservation easement in perpetuity at a 4:1 ratio. You do not specifically provide that such habitat must be existing habitat to the SKR. You do not make any provision for what is to happen to the existing SKR on the site which you purport to be mitigating for. You state that the land acquired could be held by CDFW "or an approved land management entity." The conservation easement must comply with Gov. Code section 69567 and be administered by a CDFW-approved entity. You state that the compensation lands will be subject to MM BIO-17's Habitat Mitigation and Monitoring Plan, but that Plan is (*see* MM BIO-17, subsection (g)) dedicated to preserving habitat *on the VSSP site*.

B1-60

MM BIO-17 provides for a Habitat Mitigation and Monitoring Program. Among its requirements, you say, are a "detailed description of the location and boundaries of undisturbed Project areas (i.e., areas supporting *dot seed plantain*) proposed for preservation." This MM is supposedly to address impacts to the SKR, not the QCB. Although you say it can do both, the minimum requirements should be to specify habitat for the SKR that is to be preserved. The Plan is to include monitoring of species population levels for either "a minimum of five years after the completion of construction activities," MM BIO-17, subsection (g), or three years. MM BIO-17, subsection (g)(2). It should be five years. You state that SCE is to prepare a contingency plan for mitigation elements that do not meet performance or final success criteria within five years. MM BIO-17, subsection (j). Either SCE or the entity in charge of the conservation easement must be required to address this situation. Additionally, this would be a significant impact and should have been evaluated as such prospectively in this EIR. In other words, this is not mitigation to a less-than-significant level.

B1-61

Impact BIO-10: The Project could disturb endangered, threatened or proposed plant species or their habitat. Here you state that multiple populations of the federally endangered San Diego ambrosia were detected in the southern end of the VSSP site in 2014, and that other species may be present but not detectable due to low rainfall during

B1-62

the period of prior surveys. You state that MM BIO-18 (preconstruction surveys and avoidance) and MM BIO-19 (compensation) will adequately mitigate for these impacts. We disagree.

First, you state that MM BIO-18 will require surveys "during a year in which rainfall totals are at least 80% of average and in which the temporal distribution of rainfall is not highly abnormal." We're not sure this year will qualify. The MM provides for a buffer of at least 50 feet. We do not think this is adequate to assure non-disturbance. You say that "Where impacts to listed plants are determined to be unavoidable the USFWS and CDFW shall be consulted for authorization." This is a significant impact, and it is *not* mitigated by compensation at the ratio of 1:1 (for "permanent" impacts) or 0.5:1 (for supposedly "temporary" impacts) as is provided for in MM BIO-19. This is not an adequate ratio for plants, which are known not to recover or propogate when transplanted or replaced. As noted above, the entity that holds the conservation easement under MM BIO-19 needs to be approved by CDFW under the Government Code section cited earlier. **B1-62 Cont.**

You have also omitted mention of the impacts to critical habitat for the San Diego ambrosia. What are the impacts of your Project to this critical habitat? This is a CEQA consideration. Also, the federal ESA prohibits federal agencies from taking actions that will destroy or adversely modify critical habitat. What are the obligations of the USACE with respect to this habitat? **B1-63**

Criterion 3: The Project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies or regulations or by CDFW or USFWS. Impact BIO-11: The Project could result in injury or mortality of the western spadefoot toad. Obviously, Criterion 3 (which comes from CEQA Guidelines Appendix G.IV.a.) *also* applies to all the impacts to state and federally listed species (which are "special status species") as well as the western spadefoot toad. With regard to the toad, a California Species of Special Concern ("CSC"), you indicate that there could be impacts to the toad, their egg masses and larvae. You note that the species is nocturnal and vehicles driven at night could impact it. This alone is a significant impact and no vehicle driving should be permitted at night. You state that impacts will be mitigated to less than significant levels through MM BIO-20. **B1-64**

MM BIO-20 provides for the relocation of individuals and egg masses. You say "No site preparation or construction activities shall be performed in the vicinity of occupied ponds until the design and construction of the relocation habitat in preserved areas of the site has been completed and all western spadefoot toad adults, tadpoles and egg masses are detected and moved to the created pool habitat." First of all, we are concerned you won't locate tadpoles and egg masses. Second, tadpoles feed on planktonic organisms and algae. Such organisms are unlikely to exist or spontaneously occur in newly created "habitat," and the tadpoles can become cannibalistic. Third, you provide for "*a* preconstruction survey," when the species can be detected, and then surveys annually, *if* **B1-65**

the toad was detected, "generally between the months of February and April." According to your own description of its habits, you may well not detect the toad – which you said typically emerges from January to March but may emerge at any time between October and April. Fourth, you do not specify when, relative to disturbance at each site, the ("a") survey for the toad will occur. It should occur within one week of ground-disturbing activities in each location. In short, the detection of the toad may not occur when it is in fact present and the creation of habitat may well be unsuccessful. Further, you have admitted that there may be impacts to the toad through soil compaction, which can destroy their burrows. Under these circumstances, you have not mitigated to less-than-significant levels. We also note that you committed to daily preconstruction surveys for the two-striped garter snake; this should occur for the toad as well.

B1-65 Cont.

Impact BIO-12: The Project could result in injury or mortality of the two-striped garter snake, a CSC. You state that the Project could result in similar impacts to the toad and that this would be considered significant without mitigation. You assert that mitigation to less-than-significant levels will occur through implementation of MM BIO-21. You state there may be more mitigation required under the MSHCP; you should have specified what. You state that any garter snakes found within a disturbance area will be relocated to the nearest suitable habitat, but it is our understanding that these snakes will tend to void (and strike) when picked up, which can affect their survival. You have committed to daily surveys for the garter snake; this should occur for all special status species.

B1-66

Impact BIO-13: The Project could result in injury or mortality of amphibians and reptile species designated as CSC, CDFW Special Animals, or MSHCP Covered Species. You noted that three other special-status reptile and amphibian species were detected during surveys and that more could be present. You indicate that the impacts to these species could be the same as for the toad and the garter snake. You primarily rely on MM BIO-22 to mitigate what you concede are potentially significant impacts to these species. You state, "Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing." This should occur at each site. You state that the species will be relocated. These species also could be subject to impacts from soil compaction, as you note, even if they are not detected, and this is a significant impact.

B1-67

Impact BIO-14: The Project could disturb nesting or migrant CSC, CDFW Special Animal, California Fully Protected, or MSHCP covered bird species. You indicate that a variety of additional special-status bird species were detected including the Cooper's hawk, the yellow warbler, the white-tailed kite, the yellow-breasted chat, the loggerhead shrike, Allen's hummingbird, and the hermit warbler. You averred that the impacts would be similar to those under Impacts BIO-3, -5, and -6. You claim that these impacts will be mitigated to less-than-significant levels by MM's BIO-1 through -9. These Mitigation Measures call for surveys for the LBV, SWFL, WFL, and CAGN. You have not committed to surveys for the additional species listed here. The impacts remain significant without specific survey and avoidance (and habitat replacement) mitigations.

B1-68

Impact BIO-15: The Project could result in the mortality of, and loss of habitat for, special status bat species. You indicate that construction and human disturbance can lead bats to abandon roosts and maternal colonies. You provide in MM BIO-23 for surveys for bats prior to ground-disturbing activities and the "identification of alternative roost sites should eviction be required." You provide for surveys no more than 15 days prior to grading near or removal of trees or other structures. These surveys, obviously, should take place no more than 15 days prior to disturbance at each site. You propose to have SCE construct alternative roost sites and then evict the bats: "By making the roosting habitat available prior to eviction, the colony will have a better chance of finding and using the roost." We think this sounds far-fetched and that it is unlikely the bats will use the constructed roosts. Accordingly, impacts remain significant.

B1-69

Impact BIO-16: The Project could result in the mortality of, and loss of habitat for, small mammals designated as CSC or MSHCP covered species. You concede that "Construction disturbance can . . . result in flushing of small animals from refugia, which increases the predation risk," and that "Indirect impacts include exposure to fugitive dust, alteration of soils, such as compaction, that could preclude burrowing, and the spread of exotic weeds, and increased noise levels." Another direct impact could be the crushing, through soil compaction, of animals within their burrows. We agree that these impacts would be significant. You claim that MMs BIO-1 through -5 and NOI-2 will reduce impacts to less-than-significant levels. These impacts will not remediate impacts to species from direct crushing, soil compaction or noise, which will be intense despite the use of mufflers. You have not proposed relocating these species, and we believe impacts are still at significant levels.

B1-70

Impact BIO-17: The Project could disturb CRPR [California Rare Plant Rank] or MSHCP covered plant species or their habitat. You note that six species of CRPR or MSHCP covered plants were located within the Project area: Engelmann oak (CRPR 4.3 and MSHCP), long-spined spineflower (CRPR 1B.2), Palmer's grapplinghook (CRPR 4.2), paniculate tarplant (CRPR 4.2), small-flowered morning- glory (CRPR 4.2), and smooth tarplant (CRPR 1B.1 and MSHCP). You claim that "many" occur in areas not subject to direct impacts. Again, under CEQA, it was your obligation to map areas of potential impact and non-impact for the public to see. The impacts, you note, "include but are not limited to" "direct removal of plants during the course of construction, the creation of conditions favorable to invasion of weedy exotic species, altered light and hydrologic regimes, and vegetation management." You summarily dismiss impacts to these species by stating that more than half are to plants that are CRPR 4, so they are "adverse but not significant." You state, "Although impacts to these plants are not considered significant[,] mitigation for other species including the acquisition of lands for burrowing owl and impacts to sensitive vegetation communities will reduce impacts to these species *should they occur on the acquired parcels*." This, of course, would be mere happenstance. We disagree with your conclusion that impacts to the communities of CRPR 4 species are not significant.

B1-71

Regarding the CRPR 1B long-spined spineflower and smooth tarplant, you indicate that primarily MMs BIO-24 and -25 will mitigate impacts to less than significant. MM BIO-24 provides that SCE is to conduct surveys for these species (as well as any others including the Munz's onion the Parry's spineflower and the round leaved filaree), and that they will be marked and a buffer placed around them of 50 feet minimum unless by approval of USFWS, CDFW and the CPUC. You indicate here that you will conduct these surveys in all areas subject to ground disturbing activity including construction areas, assembly yards and areas subject to grading for new access roads. *All* of your surveys should cover these areas, as they would appear to be more extensive than the area surveyed in the DEIR for the Project, and they should have been included in the DEIR. You provide that if the Project results in the loss of more than 10% of the onsite population of any special status plant species, there should be mitigation. This 10% "free pass" has no basis in the record and is a significant impact, and it will be magnified by the loss of special status plants that were lost but not detected.

B1-72

MM BIO-25 provides for compensation at only a 1:1 level for "permanent" impacts and 0.5:1 for "temporary" impacts. We've addressed the inadequacy of these two ratios before and our earlier comments are fully applicable here.

B1-73

Impact BIO-18: The Project could result in injury or mortality of the burrowing owl. There were 5 individual owls and numerous suitable burrows detected during surveys prior to the creation of the DEIR. You acknowledge there could be direct impacts to the owl through the crushing of burrows (including occupied burrows), the removal or disturbance of vegetation, increased noise levels from heavy equipment, increased human exposures and exposure to fugitive dust. Other direct impacts could result from vehicles operating at night or in the early morning, although as we have said before they should not be. Indirect impacts you note include the loss of habitat due to colonization of noxious weeds, mowing or grazing of existing vegetation and degradation of foraging habitat. Another indirect impact you do not mention is the loss of habitat itself. You claim that these impacts will be reduced to less than significant levels by MM BIO-26 as well as MM BIO-1 through -5. MM BIO-1 through -5 are not directed at the loss of the owl and would have minimal beneficial effects.

B1-74

MM BIO-26 calls for focused preconstruction surveys for burrowing owl and the implementation of avoidance measures. You provide there will be a 250-foot buffer during the nesting season. This conflicts with the CDFW burrowing owl Staff Report (Attachment A), at 9, which indicates the during the nesting season there should be a buffer of 200 *meters*. You also look to be wrong on when the nesting season occurs based on that document. MM BIO-26 also calls for passive relocation during the non-breeding season if there is any danger to the owl. The same Staff Report provides that new burrows should be less than 100 meters away and *should be natural*. Attachment A at 10. Further, you need an approved burrowing owl exclusion plan in that instance, *id.* at 11, and burrowing owl need to be observed using the new burrows. *Id.* You have not presently mitigated to a less than significant level.

B1-75

Impact BIO-19: The Project could result in the loss of jurisdictional waters and/or wetland habitats. This is under your *Criterion 4,* which corresponds to Guidelines Appendix G, section IV.c., *Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including but not limit4ed to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?* You write, "Direct impacts to state and federal waters would include the removal of native riparian vegetation, the discharge of fill, degradation of water quality, and increased erosion and sediment transport. Indirect impacts could include alterations to the existing topographical and hydrological conditions and the introduction of non-native, invasive plant species." You state these impacts would be reduced to less than significant through the implementation of MM's BIO-1 through -5 and MM BIO-13. These measures will not minimize impacts to wetlands which you fill or damage and we have addressed them before. Of relevance here, MM BIO-3 is for *permanent* impacts only, for vegetation and not jurisdictional features, and MM BIO-13 simply requires SCE to avoid wetlands or seasonal depressions. Despite these measures you are still impacting jurisdictional waters, and you should be mitigating for their loss. Your measures will do nothing to address the permanent impacts to 0.01 acres of federal wetlands, and 0.01 acres of waters of the state, or the temporary impacts to 1.79 acres of federal waters including 1.48 acres of wetland waters, and 2.43 acres of CDFW jurisdictional waters. You still have not obtained permits under sections 401 and 404 of the Clean Water Act, the Porter-Cologne Act, and the Fish & Game Code. This should have occurred prior to the preparation of the DEIR.

B1-76

The MSHCP requires avoidance with edge treatments, MSHCP at 6.1.2 (you refer to the MSHCP repeatedly throughout your document and the MSHCP should be included as a part of the administrative record; it is too voluminous for us to attach it here), and if avoidance cannot be implemented, a Determination of Biologically Equivalent or Superior Preservation ("DBESP"). *Id.* SCE should have gotten the DBESP already but for the fact that the CPUC is asserting preemptive jurisdiction over the Project and is not an MSHCP Permittee. The DBESP is to ensure *replacement* for lost habitat.

B1-77

Impact BIO-20: The Project could interfere with established migratory wildlife corridors. The CMLP has identified an at-risk habitat linkage area crossing Leon Road just north of Baxter Road along the VSSP route. You claim this impact is only "Class III" – less than significant. You say that construction impacts would be temporary. Unfortunately, impacts would not be temporary given that you are not timely remediating vegetation under your mitigation measures. Additionally, the Project is slated to last for at least 16 months, which is significant in terms of the lifecycle of a number of species impacted.

B1-78

Cumulative Impacts. Regarding Criterion BIO1, *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by CDFW or USFWS?*, you aver that your cumulative contribution will be insignificant. However, you admit that some of your impacts will be permanent, and you have not mitigated for them all (such as to

B1-79

waters of the US and waters of the State), and you have inadequate mitigation for "temporary" impacts. In combination with the other multiple construction projects which will alter the face of the region, your impacts will be significant.

B1-79 Cont.

Concerning Criterion BIO2, *Would the Project have an adverse effect, either directly or through habitat modification, on any species listed as endangered, threatened or proposed, or critical habitat for these species?*, you recognize that "Construction and operation of the VSSP would combine with the construction and operation for other projects in the defined geographic extent to result in significant cumulative impacts to threatened or endangered plants and wildlife." Despite this, you claim that MMs BIO-1 through -18 will reduce these impacts to less than significant because they require compensation for permanent impacts to riparian habitat and sensitive communities. We do not believe those Mitigation Measures reduce direct impacts to less than significant levels for the reasons addressed above; even if they do, there can be and are cumulative impacts, and they will be significant.

B1-80

Regarding Criterion BIO3, *Would the proposed Project have a substantial adverse directly or through habitat modification on any species identified as a candidate, sensitive, or special status species?*, you similarly concede it would have wide-ranging effects: "Because so much of the remaining habitat for the listed species within the region has been lost or degraded already, relatively minor changes within the remaining habitat, particularly when considered cumulatively, would have significant impacts to listed plants and wildlife." Here you rely upon MMs BIO-1 through -26. We have addressed the inadequacy of those measures above, and again, that is with regard to direct impacts. Cumulative impacts merely require an incremental effect to be significant, and we have that here.

B1-81

Criterion BIO4 asks, *Would the Project have a substantial adverse effect on federally protected wetlands?* You acknowledge that there would be approximately 0.01 acres of permanent and 4.61 acres of "temporary" impacts. You again state that MMs BIO-1 through -5 and MM BIO-13 will require compensation, but this is only for vegetation and does not involve compensation for permanent or temporary jurisdictional waters loss. You claim you are reducing impacts to an insignificant level but you do not acknowledge the cumulative loss of wetland and riparian habitats that you are not mitigating for.

B1-82

Your Criterion BIO5 is *Would the Project interfere substantially with movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?* You concede here that "the impacts of the VSSP and reasonably foreseeable projects would be significant," but you claim that MMs BIO-1 through -5 and MM BIO-7 would reduce the Project's incremental contribution to cumulative impacts to less than cumulatively considerable. On what basis do you make this assertion? We do not find your conclusion credible or based on substantial evidence.

B1-83

Cultural and Paleontological Resources

In Section C.6., you indicate that there are several sites which you recommend for listing with the California Register of Historic Resources ("CRHR"). Five of 23 are known resources recommended or determined eligible for the CRHR; an additional 12 could contribute to a prehistoric archaeological complex. You also state that several types of deposits along the Project route have a high potential for holding fossils.

Impact CR-1: Implementation of the Project could demolish, destroy relocate or disturb a cultural resource in a manner that would materially impair the significance of the resource. To mitigate this impact, you propose MMs CR-1 through -7. **B1-84**

MM CR-1 is to avoid environmentally sensitive areas ("ESAs"), and provides that SCE shall perform focused surveys for any Project area not yet surveyed. This should have happened prior to CEQA review.

MM CR-2 is to develop a Cultural Resource Management Plan ("CRMP"). This CRMP should have been developed already in consultation with the relevant Tribes. **B1-85**

MM CR-3 is to train construction personnel regarding recognition of possible buried resources. While this is a laudable goal, SCE will be using equipment that has a high likelihood of destroying any buried artifacts. This would be a significant impact and may well occur without anyone knowing it has. **B1-86**

MM CR-4 calls for cultural resource monitoring during construction. You state that monitoring shall occur in all areas of ground disturbing activities that occur within 100 feet of a cultural resource ESA. This leaves a lot of area where monitoring will not be occurring – especially since you have only designated as ESAs the sites which you recommend for listing with the CRHR, and not all the sites you identified. It is highly likely that significant cultural resources in other areas may exist. **B1-87**

MM CR-5, Native American Consultation, says it will cover matters decided upon to be included in the CRMP within 30 days of construction. This conflicts with MM CR-2 which says the CRMP is to be ready 60 days before construction. **B1-88**

MM CR-7, Treat Previously Unidentified Cultural Resources, provides that if there are finds, construction shall be halted and diverted away while a qualified archaeologist assess the significance of the resource. The Tribes should be informed of and allowed to participate in this process. **B1-89**

Impact CR-2: The Project could uncover, expose or damage human remains. You recognize that this is a significant impact if remains are not left in place.

Impact CR-3: Construction of the Project could destroy or disturb significant paleontological resources. You recognize that "In total, the proposed Project is underlain **B1-90**

by 78 acres determined to have no paleontological sensitivity, 12 acres of no to low paleontological sensitivity, 30 acres determined to have low to high paleontological sensitivity, dependent on depth, and 338 acres of high . . . paleontological sensitivity." You acknowledge that construction of the Project can have significant adverse impacts through:

- damage, disturbance, or destruction of a significant fossil,
- destruction of a unique geologic feature associated with a paleontological site, and
- disturbance or destruction of a site, which results in the loss of the scientific context of fossil remains.

You contend that these significant potential impacts will be mitigated to less than significant levels by MMs CR-9 through -13. MMs CR-9 through -13 would have SCE (9) conduct a field survey of the ground surface within the proposed Project area, (10) develop a paleontological resource mitigation and monitoring plan which identifies the approximate depth of possible resources and calls for full-time monitoring in areas of high sensitivity, (11) train construction personnel, (12) monitor construction, and (13) prepare a final report with curation, with SCE bearing the costs. While these goals may lead to some intact finds, you cannot seriously contend that the driving in of poles through the length of the Project has no risk of damaging paleontological resources. In fact, it is likely that it will, and the impacts would be significant, although they would not be known until later. We do not believe you have reduced, or can reduce, impacts to a less-than-significant level.

B1-90 Cont.

Geology and Soils

Impact GEO-3: Project structures could be damaged by seismically-induced ground shaking. You assert that this danger is mitigated by General Orders ("GOs") 95 and 128. What are the requirements of the GOs and how do they reduce these risks to insignificant levels? GO 95 does not contain the word "earthquake" except as it relates to delayed permitting maintenance and as to emergency shutoffs per Appendix H.

B1-91

Impact GEO-4: Project structures could be damaged by seismically-induced ground failures. Here you disclose that "Portions of the proposed Project have been mapped as having moderate to very high liquefaction susceptibility by the County of Riverside," and that "New Project structures with foundations, such as tubular steel poles (TSPs), along Segment 1 that are located in areas with potentially liquefiable alluvial sediment could potentially suffer liquefaction related damage in a large earthquake." You aver that MM GEO-1 will reduce this potential impact to less than significant levels. We hope you are right.

B1-92

Greenhouse Gas Emissions

Regarding greenhouse gas ("GHG") emissions, you tell us that "Direct emissions from operation activities include a small amount of GHG emissions generated from O&M

B1-93

activities and from leaks of SF_6 from the new substation electrical equipment." As you state, SF_6 has a global warming potential ("GWP") of 22,800. Therefore we question your relatively small GHG emissions projections. Please provide us with your emissions rate for SF_6 averaged throughout all your facilities and for circuit breakers in substations comparable to the substation you plan to install in. This information should have been disclosed in the DEIR.

B1-93 Cont.

You assert that SCAQMD, "which has regulatory authority over the air pollutant emissions, has established a recommended CEQA significant emissions level of 10,000 metric tons of CO2e per year for industrial emissions, including amortizing emissions over the Project life." This is incorrect. The SCAQMD threshold relates only to projects the SCAQMD approves. SCAQMD has *not* recommended a threshold to other agencies. Moreover, amortizing construction emissions over project life is inappropriate for a Project such as this given the short-term reduction goals in AB32 and Executive Order S-3-05.

B1-94

Hazards and Hazardous Materials

We are only concerned here with your statement that during construction, "SCE indicates that the portions of the proposed Project area located within moderate to high fire hazard areas would be grubbed of vegetation and graded (if necessary) prior to staging construction equipment on the site." This would directly conflict with your earlier commitments regarding avoidance of sensitive habitat. We have the same concern with regard to O&M activities.

B1-95

Hydrology and Water Quality

Impact HYD-2: Construction could deplete groundwater supplies or interfere with groundwater recharge. You indicate that the Project could use up to 110 acre feet of water for dust control, and this could deplete groundwater. You assert that this impact will be reduced to less than significant levels through MM HYD-1, the use of nonpotable water, *if available*. The MM does not reduce impacts to less than significant levels unless a nonpotable water source is identified. This should have been done before the DEIR was completed. Your conclusion – both as to direct impacts and cumulative impacts – is not based on substantial evidence in the absence of such a source.

B1-96

Land Use

In Table C.11-3 you review potential conflicts with the Riverside County, City of Menifee, City of Murrieta, and City of Temecula General Plans. There are multiple instances where you concede the Project "may" conflict with these General Plans. These are significant, unmitigated impacts, as delineated below.

B1-97

County of Riverside General Plan: Policies LU 4.1, LU 6.1, LU 6.4, LU 13.1, LU 13.4, LU 13.5 (you contend you are just replacing poles but this is exactly what the Policy is

aimed at, the undergrounding of utilities for new or relocated electric infrastructure), LU 20.1, LU 20.2, LU 20.4; Policy C 25.2 (you say the proposed Project "includes an underground component," and that in addition "the EIR includes an analysis of aesthetics/visual resources," but this does not address the Policy which calls for undergrounding, which you are doing only on 1600 feet of a more than 15-mile long Project, and we're not sure even that is in unincorporated Riverside County); Policy OS 21.1.
County of Riverside Winchester Properties/Silverhawk Specific Plan (#213): Design Guideline 11.

County of Riverside Crown Valley Village Specific Plan (#238): Design Guidelines (Utilities).

County of Riverside Borel Airpark Specific Plan (#265): Design Guidelines (Utilities).

B1-97 Cont.

City of Menifee General Plan: Policy OSC-3.1 says to identify and preserve the view corridors and outstanding scenic vistas within the City. It is not limited to County Eligible Scenic Highways, which is what you limit your discussion to. You haven't adequately identified view corridors and you have not shown any views from the Eligible Scenic Highways you do identify so it is impossible to evaluate your statement. Policy CD-4.8 says to preserve and enhance view corridors by undergrounding or screening new or relocated utilities from view if visible from the City's scenic highway corridors. Again, you haven't provided any of the views so it is impossible to evaluate your assertions.

B1-98

City of Temecula General Plan: Community Design Element, Policy 5.6 says to promote and implement underground utilities, where feasible. You state that the only portion of the Project within Temecula is the reconductoring of an existing line, and that the resulting aesthetic effect would be negligible. We dispute this. The City's Policy is to favor undergrounding. This should apply when there are renovations to existing lines just as it does when there are new lines placed.

B1-99

Noise

Impact NOI-1: Project-related construction noise could violate local standards. You concede that the Project, which is proposed to be constructed from 6 a.m. to 6 p.m., may violate local standards which prohibit construction noise except during specified hours. Under MM NOI-1 you indicate that you will comply with the time limits of local noise regulations regarding construction noise.

B1-100

Impact NOI-3: Temporary or periodic Project-related construction noise could substantially disturb sensitive receptors. You admit that noise level of up to 86.1 dBA L_{eq} could occur based on concomitant use of a material handling truck and a boom/crane truck. "As such, construction noise would exceed, at some locations near the construction sites, the existing 46 dBA to 62 dBA L_{eq} daytime ambient noise levels

B1-101

monitored within the Project area . . . which could disturb sensitive receptors." This is an understatement: your projected noise levels would substantially exceed the existing noise levels. And the noise would be quite proximate to sensitive receptors – within 50 feet. You claim that MM NOI-1, only allowing construction during the permitted times referred to under Impact NOI-1, and MM NOI-2, placing mufflers on construction equipment and setting up a hotline residents can call, will mitigate this impact to less than significant levels. We hardly think so. The requirement of mufflers on construction equipment is imposed by local ordinance anyway, and a hotline will not prevent the noise (which is necessary to Project construction) from occurring. This is a significant impact not mitigated to below significant levels.

B1-101 Cont.

Impact NOI-7: Project construction activity could temporarily cause excessive groundborne vibration or noise. You state that the annoyance level or physical damage to sensitive buildings standard is what is applicable. You ignore the City of Murrieta Municipal Code which limits groundborne vibration to the perception threshold which it states is 0.01 in/sec over the range of 1 to 100 Hertz. Murrieta Municipal Code § 16.30.130(K). You do state that vibrations will be at 0.003 in/sec PPV for a track-type dozer, but you have other equipment listed in your equipment list at B-44 such as a Truck, Semi-Tractor at 400 hp and an Auger Truck, at 210 hp, that may lead to more groundborne vibration and noise. Please explain why you did not analyze these sources of vibration as well.

B1-102

Transportation and Traffic

Impact TRA-1: Temporary lane or road closures could adversely affect traffic flow and congestion. You indicate that MM TRA-1 will reduce impacts to less than significant levels. We agree you may have done all that you can with the Mitigation Measure, but we do not agree that this will reduce impacts below the level of significance. And emergency service vehicle access may well be impeded despite the Construction Traffic Control Plan. This is a significant direct and cumulative impact.

B1-103

Alternatives Analysis

Alternative 1 is a subtransmission route along Menifee Road that would be approximately 19 miles in length following Segment 1 for the first 8 miles. With regard to Biological Resources, you indicate that the alternative will have impacts to more coastal sage scrub and a freshwater marsh which has known occurrences of the LBV. You claim that "Construction activities under Alternative 1 would be identical to the proposed Project, with only a variation in the acreage of specific vegetation communities that would be affected by the altered construction route." But the proposal would also affect more jurisdictional waters, for which you have not mitigated, and your mitigation for species impacts is not adequate, so the impacts would be significantly greater. The Cultural and Paleontological Resource impacts also look to be greater. You say with regard to impacts to groundwater that the alternative would use only up to 110 acre feet of water, but since

B1-104

the Project is significantly longer, we would expect it to use more (we do not think your conclusion to the contrary is based on substantial evidence). **B1-104 Cont.**

Alternative 2 would follow the same route but go underground for 3,300 feet from Branding Iron Court to Bonsai Circle along Leon Road. This would add another two months to the construction schedule. The alternative would have greater air quality impacts, though you assert that these can be mitigated. It would also lead to more noise and more significant traffic impacts. **B1-105**

Additional CEQA Considerations

Population and Housing. The DEIR states that "SCE has identified the VSSP to add capacity to the system, to serve the long-term forecasted electrical demand requirements in the area served by the system." DEIR at A-2. This sidesteps the point: the infrastructure is growth-enhancing as it removes an obstacle to growth. **B1-106**

Significant Effects That Cannot Be Avoided. For the reasons conveyed above, we believe you have understated those impacts which are unavoidably significant. **B1-107**

Cumulative Impacts. As suggested above, we believe there are other Cultural Resource impacts beyond merely those to human remains that are cumulatively significant. **B1-108**

Irreversible/Irretrievable Commitments of Resources. You say the impacts to Biological Resources can be mitigated. We disagree. You do concede there would be permanent impacts to 14.2 acres and temporary impacts to 194 acres, at E-3, though you then contradict yourself and say there would be permanent impacts to 10 acres and temporary impacts to 218 acres, at E-4. Which is it? You should have a better idea of – actually, you should know – how many acres you are impacting before you prepare and send out an EIR. **B1-109**

Growth-Inducing Impacts. As noted above, you are removing an obstacle to growth by providing increased electrical capacity. You cite some rather spectacular anticipated growth in the region. If there were a limit on electric service available, we do not anticipate this growth would occur. **B1-110**

We look forward to your response. Please contact us when a Final EIR is available, or with any further information regarding your intent to implement this Project, at collins@blumcollins.com and bentley@blumcollins.com. Thank you.

Sincerely,

Craig M. Collins

Attachments: Attachment A

Comment Set B1 – Blum Collins LLP, Attachment A

B1-111

Staff Report on Burrowing Owl Mitigation

State of California

Natural Resources Agency

Department of Fish and Game

March 7, 2012[1]

[1] This document replaces the Department of Fish and Game 1995 Staff Report On Burrowing Owl Mitigation.

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INTRODUCTION AND PURPOSE

Maintaining California's rich biological diversity is dependent on the conservation of species and their habitats. The California Department of Fish and Game (Department) has designated certain species as "species of special concern" when their population viability and survival is adversely affected by risk factors such as precipitous declines or other vulnerability factors (Shuford and Gardali 2008). Preliminary analyses of regional patterns for breeding populations of burrowing owls (*Athene cunicularia*) have detected declines both locally in their central and southern coastal breeding areas, and statewide where the species has experienced modest breeding range retraction (Gervais et al. 2008). In California, threat factors affecting burrowing owl populations include habitat loss, degradation and modification, and eradication of ground squirrels resulting in a loss of suitable burrows required by burrowing owls for nesting, protection from predators, and shelter (See Appendix A).

The Department recognized the need for a comprehensive conservation and mitigation strategy for burrowing owls, and in 1995 directed staff to prepare a report describing mitigation and survey recommendations. This report, "1995 Staff Report on Burrowing Owl Mitigation," (Staff Report) (CDFG 1995), contained Department-recommended burrowing owl and burrow survey techniques and mitigation measures intended to offset the loss of habitat and slow or reverse further decline of this species. Notwithstanding these measures, over the past 15+ years, burrowing owls have continued to decline in portions of their range (DeSante et al. 2007, Wilkerson and Siegel, 2010). The Department has determined that reversing declining population and range trends for burrowing owls will require implementation of more effective conservation actions, and evaluating the efficacy of the Department's existing recommended avoidance, minimization and mitigation approaches for burrowing owls.

The Department has identified three main actions that together will facilitate a more viable, coordinated, and concerted approach to conservation and mitigation for burrowing owls in California. These include:

1. Incorporating burrowing owl comprehensive conservation strategies into landscape-based planning efforts such as Natural Community Conservation Plans (NCCPs) and multi-species Habitat Conservation Plans (HCPs) that specifically address burrowing owls.
2. Developing and implementing a statewide conservation strategy (Burkett and Johnson, 2007) and local or regional conservation strategies for burrowing owls, including the development and implementation of a statewide burrowing owl survey and monitoring plan.
3. Developing more rigorous burrowing owl survey methods, working to improve the adequacy of impacts assessments; developing clear and effective avoidance and minimization measures; and developing mitigation measures to ensure impacts to the species are effectively addressed at the project, local, and/or regional level (the focus of this document).

This Report sets forth the Department's recommendations for implementing the third approach identified above by revising the 1995 Staff Report, drawing from the most relevant and current knowledge and expertise, and incorporating the best scientific information

available pertaining to the species. It is designed to provide a compilation of the best available science for Department staff, biologists, planners, land managers, California Environmental Quality Act (CEQA) lead agencies, and the public to consider when assessing impacts of projects or other activities on burrowing owls.

This revised Staff Report takes into account the California Burrowing Owl Consortium's Survey Protocol and Mitigation Guidelines (CBOC 1993, 1997) and supersedes the survey, avoidance, minimization and mitigation recommendations in the 1995 Staff Report. Based on experiences gained from implementing the 1995 Staff Report, the Department believes revising that report is warranted. This document also includes general conservation goals and principles for developing mitigation measures for burrowing owls.

DEPARTMENT ROLE AND LEGAL AUTHORITIES

The mission of the Department is to manage California's diverse fish, wildlife and plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public. The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitats necessary to maintain biologically sustainable populations of those species (Fish and Game Code (FGC) §1802). The Department, as trustee agency pursuant to CEQA (See CEQA Guidelines, §15386), has jurisdiction by law over natural resources, including fish and wildlife, affected by a project, as that term is defined in Section 21065 of the Public Resources Code. The Department exercises this authority by reviewing and commenting on environmental documents and making recommendations to avoid, minimize, and mitigate potential negative impacts to those resources held in trust for the people of California.

Field surveys designed to detect the presence of a particular species, habitat element, or natural community are one of the tools that can assist biologists in determining whether a species or habitat may be significantly impacted by land use changes or disturbance. The Department reviews field survey data as well as site-specific and regional information to evaluate whether a project's impacts may be significant. This document compiles the best available science for conducting habitat assessments and surveys, and includes considerations for developing measures to avoid impacts or mitigate unavoidable impacts.

CEQA

CEQA requires public agencies in California to analyze and disclose potential environmental impacts associated with a project that the agency will carry out, fund, or approve. Any potentially significant impact must be mitigated to the extent feasible. Project-specific CEQA mitigation is important for burrowing owls because most populations exist on privately owned parcels that, when proposed for development or other types of modification, may be subject to the environmental review requirements of CEQA.

Take

Take of individual burrowing owls and their nests is defined by FGC section 86, and prohibited by sections 3503, 3503.5 and 3513. Take is defined in FGC Section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill."

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) implements various treaties and conventions between the United States and Canada, Japan, Mexico, and Russia for the protection of migratory birds, including the burrowing owl (50 C.F.R. § 10). The MBTA protects migratory bird nests from possession, sale, purchase, barter, transport, import and export, and collection. The other prohibitions of the MBTA - capture, pursue, hunt, and kill - are inapplicable to nests. The regulatory definition of take, as defined in Title 50 C.F.R. part 10.12, means to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to hunt, shoot, wound, kill, trap, capture, or collect. Only the verb "collect" applies to nests. It is illegal to collect, possess, and by any means transfer possession of any migratory bird nest. The MBTA prohibits the destruction of a nest when it contains birds or eggs, and no possession shall occur during the destruction (see Fish and Wildlife Service, Migratory Bird Permit Memorandum, April 15, 2003). Certain exceptions to this prohibition are included in 50 C.F.R. section 21. Pursuant to Fish & Game Code section 3513, the Department enforces the Migratory Bird Treaty Act consistent with rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Treaty Act.

Regional Conservation Plans

Regional multiple species conservation plans offer long-term assurances for conservation of covered species at a landscape scale, in exchange for biologically appropriate levels of incidental take and/or habitat loss as defined in the approved plan. California's NCCP Act (FGC §2800 et seq.) governs such plans at the state level, and was designed to conserve species, natural communities, ecosystems, and ecological processes across a jurisdiction or a collection of jurisdictions. Complementary federal HCPs are governed by the Endangered Species Act (7 U.S.C. § 136, 16 U.S.C.§ 1531 et seq.) (ESA). Regional conservation plans (and certain other landscape-level conservation and management plans), may provide conservation for unlisted as well as listed species. Because the geographic scope of NCCPs and HCPs may span many hundreds of thousands of acres, these planning tools have the potential to play a significant role in conservation of burrowing owls, and grasslands and other habitats.

Fish and Game Commission Policies

There are a number of Fish and Game Commission policies (see FGC §2008) that can be applied to burrowing owl conservation. These include policies on: Raptors, Cooperation, Endangered and Threatened Species, Land Use Planning, Management and Utilization of Fish and Wildlife on Federal Lands, Management and Utilization of Fish and Wildlife on Private Lands, and Research.

GUIDING PRINCIPLES FOR CONSERVATION

Unless otherwise provided in a statewide, local, or regional conservation strategy, surveying and evaluating impacts to burrowing owls, as well as developing and implementing avoidance, minimization, and mitigation and conservation measures incorporate the following principles. These principles are a summary of Department staff expert opinion and were used to guide the preparation of this document.

1. Use the Precautionary Principle (Noss et al.1997), by which the alternative of increased conservation is deliberately chosen in order to buffer against incomplete knowledge of burrowing owl ecology and uncertainty about the consequences to burrowing owls of potential impacts, including those that are cumulative.
2. Employ basic conservation biology tenets and population-level approaches when determining what constitutes appropriate avoidance, minimization, and mitigation for impacts. Include mitigation effectiveness monitoring and reporting, and use an adaptive management loop to modify measures based on results.
3. Protect and conserve owls in wild, semi-natural, and agricultural habitats (conserve is defined at FGC §1802).
4. Protect and conserve natural nest burrows (or burrow surrogates) previously used by burrowing owls and sufficient foraging habitat and protect auxiliary "satellite" burrows that contribute to burrowing owl survivorship and natural behavior of owls.

CONSERVATION GOALS FOR THE BURROWING OWL IN CALIFORNIA

It is Department staff expert opinion that the following goals guide and contribute to the short and long-term conservation of burrowing owls in California:

1. Maintain size and distribution of extant burrowing owl populations (allowing for natural population fluctuations).
2. Increase geographic distribution of burrowing owls into formerly occupied historical range where burrowing owl habitat still exists, or where it can be created or enhanced, and where the reason for its local disappearance is no longer of concern.
3. Increase size of existing populations where possible and appropriate (for example, considering basic ecological principles such as carrying capacity, predator-prey relationships, and inter-specific relationships with other species at risk).
4. Protect and restore self-sustaining ecosystems or natural communities which can support burrowing owls at a landscape scale, and which will require minimal long-term management.
5. Minimize or prevent unnatural causes of burrowing owl population declines (e.g., nest burrow destruction, chemical control of rodent hosts and prey).
6. Augment/restore natural dynamics of burrowing owl populations including movement and genetic exchange among populations, such that the species does not require future listing and protection under the California Endangered Species Act (CESA) and/or the federal Endangered Species Act (ESA).
7. Engage stakeholders, including ranchers; farmers; military; tribes; local, state, and federal agencies; non-governmental organizations; and scientific research and education communities involved in burrowing owl protection and habitat management.

ACTIVITIES WITH THE POTENTIAL TO TAKE OR IMPACT BURROWING OWLS

The following activities are examples of activities that have the potential to take burrowing owls, their nests or eggs, or destroy or degrade burrowing owl habitat: grading, disking, cultivation, earthmoving, burrow blockage, heavy equipment compacting and crushing burrow tunnels, levee maintenance, flooding, burning and mowing (if burrows are impacted), and operating wind turbine collisions (collectively hereafter referred to as "projects" or "activities"

whether carried out pursuant to CEQA or not). In addition, the following activities may have impacts to burrowing owl populations: eradication of host burrowers; changes in vegetation management (i.e. grazing); use of pesticides and rodenticides; destruction, conversion or degradation of nesting, foraging, over-wintering or other habitats; destruction of natural burrows and burrow surrogates; and disturbance which may result in harassment of owls at occupied burrows.

PROJECT IMPACT EVALUATIONS

The following three progressive steps are effective in evaluating whether projects will result in impacts to burrowing owls. The information gained from these steps will inform any subsequent avoidance, minimization and mitigation measures. The steps for project impact evaluations are: 1) habitat assessment, 2) surveys, and 3) impact assessment. Habitat assessments are conducted to evaluate the likelihood that a site supports burrowing owl. Burrowing owl surveys provide information needed to determine the potential effects of proposed projects and activities on burrowing owls, and to avoid take in accordance with FGC sections 86, 3503, and 3503.5. Impact assessments evaluate the extent to which burrowing owls and their habitat may be impacted, directly or indirectly, on and within a reasonable distance of a proposed CEQA project activity or non-CEQA project. These three site evaluation steps are discussed in detail below.

Biologist Qualifications

The current scientific literature indicates that only individuals meeting the following minimum qualifications should perform burrowing owl habitat assessments, surveys, and impact assessments:

1. Familiarity with the species and its local ecology;
2. Experience conducting habitat assessments and non-breeding and breeding season surveys, or experience with these surveys conducted under the direction of an experienced surveyor;
3. Familiarity with the appropriate state and federal statutes related to burrowing owls, scientific research, and conservation;
4. Experience with analyzing impacts of development on burrowing owls and their habitat.

Habitat Assessment Data Collection and Reporting

A habitat assessment is the first step in the evaluation process and will assist investigators in determining whether or not occupancy surveys are needed. Refer to Appendix B for a definition of burrowing owl habitat. Compile the detailed information described in Appendix C when conducting project scoping, conducting a habitat assessment site visit and preparing a habitat assessment report.

Surveys

Burrowing owl surveys are the second step of the evaluation process and the best available scientific literature recommends that they be conducted whenever burrowing owl habitat or sign (see Appendix B) is encountered on or adjacent to (within 150 meters) a project site

(Thomsen 1971, Martin 1973). Occupancy of burrowing owl habitat is confirmed at a site when at least one burrowing owl, or its sign at or near a burrow entrance, is observed within the last three years (Rich 1984). Burrowing owls are more detectable during the breeding season with detection probabilities being highest during the nestling stage (Conway et al. 2008). In California, the burrowing owl breeding season extends from 1 February to 31 August (Haug et al. 1993, Thompsen 1971) with some variances by geographic location and climatic conditions. Several researchers suggest three or more survey visits during daylight hours (Haug and Diduik 1993, CBOC 1997, Conway and Simon 2003) and recommend each visit occur at least three weeks apart during the peak of the breeding season, commonly accepted in California as between 15 April and 15 July (CBOC 1997). Conway and Simon (2003) and Conway et al. (2008) recommended conducting surveys during the day when most burrowing owls in a local area are in the laying and incubation period (so as not to miss early breeding attempts), during the nesting period, and in the late nestling period when most owls are spending time above ground.

Non-breeding season (1 September to 31 January) surveys may provide information on burrowing owl occupancy, but do not substitute for breeding season surveys because results are typically inconclusive. Burrowing owls are more difficult to detect during the non-breeding season and their seasonal residency status is difficult to ascertain. Burrowing owls detected during non-breeding season surveys may be year-round residents, young from the previous breeding season, pre-breeding territorial adults, winter residents, dispersing juveniles, migrants, transients or new colonizers. In addition, the numbers of owls and their pattern of distribution may differ during winter and breeding seasons. However, on rare occasions, non-breeding season surveys may be warranted (i.e., if the site is believed to be a wintering site only based on negative breeding season results). Refer to Appendix D for information on breeding season and non-breeding season survey methodologies.

Survey Reports

Adequate information about burrowing owls present in and adjacent to an area that will be disturbed by a project or activity will enable the Department, reviewing agencies and the public to effectively assess potential impacts and will guide the development of avoidance, minimization, and mitigation measures. The survey report includes but is not limited to a description of the proposed project or proposed activity, including the proposed project start and end dates, as well as a description of disturbances or other activities occurring on-site or nearby. Refer to Appendix D for details included in a survey report.

Impact Assessment

The third step in the evaluation process is the impact assessment. When surveys confirm occupied burrowing owl habitat in or adjoining the project area, there are a number of ways to assess a project's potential significant impacts to burrowing owls and their habitat. Richardson and Miller (1997) recommended monitoring raptor behavior prior to developing management recommendations and buffers to determine the extent to which individuals have been sensitized to human disturbance. Monitoring results will also provide detail necessary for developing site-specific measures. Postovit and Postovit (1987) recommended an analytical approach to mitigation planning: define the problem (impact), set goals (to guide mitigation development), evaluate and select mitigation methods, and monitor the results.

Define the problem. The impact assessment evaluates all factors that could affect burrowing owls. Postovit and Postovit (1987) recommend evaluating the following in assessing impacts to raptors and planning mitigation: type and extent of disturbance, duration and timing of disturbance, visibility of disturbance, sensitivity and ability to habituate, and influence of environmental factors. They suggest identifying and addressing all potential direct and indirect impacts to burrowing owls, regardless of whether or not the impacts will occur during the breeding season. Several examples are given for each impact category below; however, examples are not intended to be used exclusively.

Type and extent of the disturbance. The impact assessment describes the nature (source) and extent (scale) of potential project impacts on occupied, satellite and unoccupied burrows including acreage to be lost (temporary or permanent), fragmentation/edge being created, increased distance to other nesting and foraging habitat, and habitat degradation. Discuss any project activities that impact either breeding and/or non-breeding habitat which could affect owl home range size and spatial configuration, negatively affect onsite and offsite burrowing owl presence, increase energetic costs, lower reproductive success, increase vulnerability to predation, and/or decrease the chance of procuring a mate.

Duration and timing of the impact. The impact assessment describes the amount of time the burrowing owl habitat will be unavailable to burrowing owls (temporary or permanent) on the site and the effect of that loss on essential behaviors or life history requirements of burrowing owls, the overlap of project activities with breeding and/or non-breeding seasons (timing of nesting and/or non-breeding activities may vary with latitude and climatic conditions, which should be considered with the timeline of the project or activity), and any variance of the project activities in intensity, scale and proximity relative to burrowing owl occurrences.

Visibility and sensitivity. Some individual burrowing owls or pairs are more sensitive than others to specific stimuli and may habituate to ongoing visual or audible disturbance. Site-specific monitoring may provide clues to the burrowing owl's sensitivities. This type of assessment addresses the sensitivity of burrowing owls within their nesting area to humans on foot, and vehicular traffic. Other variables are whether the site is primarily in a rural versus urban setting, and whether any prior disturbance (e.g., human development or recreation) is known at the site.

Environmental factors. The impact assessment discusses any environmental factors that could be influenced or changed by the proposed activities including nest site availability, predators, prey availability, burrowing mammal presence and abundance, and threats from other extrinsic factors such as human disturbance, urban interface, feral animals, invasive species, disease or pesticides.

Significance of impacts. The impact assessment evaluates the potential loss of nesting burrows, satellite burrows, foraging habitat, dispersal and migration habitat, wintering habitat, and habitat linkages, including habitat supporting prey and host burrowers and other essential habitat attributes. This assessment determines if impacts to the species will result in significant impacts to the species locally, regionally and range-wide per CEQA Guidelines §15382 and Appendix G. The significance of the impact to habitat depends on the extent of habitat disturbed and length of time the habitat is unavailable (for example: minor – several days, medium – several weeks to months, high - breeding season affecting juvenile survival,

or over winter affecting adult survival).

Cumulative effects. The cumulative effects assessment evaluates two consequences: 1) the project's proportional share of reasonably foreseeable impacts on burrowing owls and habitat caused by the project or in combination with other projects and local influences having impacts on burrowing owls and habitat, and 2) the effects on the regional owl population resulting from the project's impacts to burrowing owls and habitat.

Mitigation goals. Establishing goals will assist in planning mitigation and selecting measures that function at a desired level. Goals also provide a standard by which to measure mitigation success. Unless specifically provided for through other FGC Sections or through specific regulations, take, possession or destruction of individual burrowing owls, their nests and eggs is prohibited under FGC sections 3503, 3503.5 and 3513. Therefore, a required goal for all project activities is to avoid take of burrowing owls. Under CEQA, goals would consist of measures that would avoid, minimize and mitigate impacts to a less than significant level. For individual projects, mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. As set forth in more detail in Appendix A, the current scientific literature supports the conclusion that mitigation for permanent habitat loss necessitates replacement with an equivalent or greater habitat area for breeding, foraging, wintering, dispersal, presence of burrows, burrow surrogates, presence of fossorial mammal dens, well drained soils, and abundant and available prey within close proximity to the burrow.

MITIGATION METHODS

The current scientific literature indicates that any site-specific avoidance or mitigation measures developed should incorporate the best practices presented below or other practices confirmed by experts and the Department. The Department is available to assist in the development of site-specific avoidance and mitigation measures.

Avoiding. A primary goal is to design and implement projects to seasonally and spatially avoid negative impacts and disturbances that could result in take of burrowing owls, nests, or eggs. Other avoidance measures may include but not be limited to:

- Avoid disturbing occupied burrows during the nesting period, from 1 February through 31 August.
- Avoid impacting burrows occupied during the non-breeding season by migratory or non-migratory resident burrowing owls.
- Avoid direct destruction of burrows through chaining (dragging a heavy chain over an area to remove shrubs), disking, cultivation, and urban, industrial, or agricultural development.
- Develop and implement a worker awareness program to increase the on-site worker's recognition of and commitment to burrowing owl protection.
- Place visible markers near burrows to ensure that farm equipment and other machinery does not collapse burrows.
- Do not fumigate, use treated bait or other means of poisoning nuisance animals in areas where burrowing owls are known or suspected to occur (e.g., sites observed with nesting

owls, designated use areas).
- Restrict the use of treated grain to poison mammals to the months of January and February.

Take avoidance (pre-construction) surveys. Take avoidance surveys are intended to detect the presence of burrowing owls on a project site at a fixed period in time and inform necessary take avoidance actions. Take avoidance surveys may detect changes in owl presence such as colonizing owls that have recently moved onto the site, migrating owls, resident burrowing owls changing burrow use, or young of the year that are still present and have not dispersed. Refer to Appendix D for take avoidance survey methodology.

Site surveillance. Burrowing owls may attempt to colonize or re-colonize an area that will be impacted; thus, the current scientific literature indicates a need for ongoing surveillance at the project site during project activities is recommended. The surveillance frequency/effort should be sufficient to detect burrowing owls if they return. Subsequent to their new occupancy or return to the site, take avoidance measures should assure with a high degree of certainty that take of owls will not occur.

Minimizing. If burrowing owls and their habitat can be protected in place on or adjacent to a project site, the use of buffer zones, visual screens or other measures while project activities are occurring can minimize disturbance impacts. Conduct site-specific monitoring to inform development of buffers (see Visibility and sensitivity above). The following general guidelines for implementing buffers should be adjusted to address site-specific conditions using the impact assessment approach described above. The CEQA lead agency and/or project proponent is encouraged to consult with the Department and other burrowing owl experts for assistance in developing site-specific buffer zones and visual screens.

Buffers. Holroyd et al. (2001) identified a need to standardize management and disturbance mitigation guidelines. For instance, guidelines for mitigating impacts by petroleum industries on burrowing owls and other prairie species (Scobie and Faminow, 2000) may be used as a template for future mitigation guidelines (Holroyd et al. 2001). Scobie and Faminow (2000) developed guidelines for activities around occupied burrowing owl nests recommending buffers around low, medium, and high disturbance activities, respectively (see below).

Recommended restricted activity dates and setback distances by level of disturbance for burrowing owls (Scobie and Faminow 2000).

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

Based on existing vegetation, human development, and land uses in an area, resource managers may decide to allow human development or resource extraction closer to these area/sites than recommended above. However, if it is decided to allow activities closer than

the setback distances recommended, a broad-scale, long-term, scientifically-rigorous monitoring program ensures that burrowing owls are not detrimentally affected by alternative approaches.

Other minimization measures include eliminating actions that reduce burrowing owl forage and burrowing surrogates (e.g. ground squirrel), or introduce/facilitate burrowing owl predators. Actions that could influence these factors include reducing livestock grazing rates and/or changing the timing or duration of grazing or vegetation management that could result in less suitable habitat.

Burrow exclusion and closure. Burrow exclusion is a technique of installing one-way doors in burrow openings during the non-breeding season to temporarily exclude burrowing owls, or permanently exclude burrowing owls and close burrows after verifying burrows are empty by site monitoring and scoping. Exclusion in and of itself is not a take avoidance, minimization or mitigation method. Eviction of burrowing owls is a potentially significant impact under CEQA.

The long-term demographic consequences of these techniques have not been thoroughly evaluated, and the fate of evicted or excluded burrowing owls has not been systematically studied. Because burrowing owls are dependent on burrows at all times of the year for survival and/or reproduction, evicting them from nesting, roosting, and satellite burrows may lead to indirect impacts or take. Temporary or permanent closure of burrows may result in significant loss of burrows and habitat for reproduction and other life history requirements. Depending on the proximity and availability of alternate habitat, loss of access to burrows will likely result in varying levels of increased stress on burrowing owls and could depress reproduction, increase predation, increase energetic costs, and introduce risks posed by having to find and compete for available burrows. Therefore, exclusion and burrow closure are not recommended where they can be avoided. The current scientific literature indicates consideration of all possible avoidance and minimization measures before temporary or permanent exclusion and closure of burrows is implemented, in order to avoid take.

The results of a study by Trulio (1995) in California showed that burrowing owls passively displaced from their burrows were quickly attracted to adjacent artificial burrows at five of six passive relocation sites. The successful sites were all within 75 meters (m) of the destroyed burrow, a distance generally within a pair's territory. This researcher discouraged using passive relocation to artificial burrows as a mitigation measure for lost burrows without protection of adjacent foraging habitat. The study results indicated artificial burrows were used by evicted burrowing owls when they were approximately 50-100 m from the natural burrow (Thomsen 1971, Haug and Oliphant 1990). Locating artificial or natural burrows more than 100 m from the eviction burrow may greatly reduce the chances that new burrows will be used. Ideally, exclusion and burrow closure is employed only where there are adjacent natural burrows and non-impacted, sufficient habitat for burrowing owls to occupy with permanent protection mechanisms in place. Any new burrowing owl colonizing the project site after the CEQA document has been adopted may constitute changed circumstances that should be addressed in a re-circulated CEQA document.

The current scientific literature indicates that burrow exclusion should only be conducted by qualified biologists (meeting the Biologist's Qualifications above) during the non-breeding

season, before breeding behavior is exhibited and after the burrow is confirmed empty by site surveillance and/or scoping. The literature also indicates that when temporary or permanent burrow exclusion and/or burrow closure is implemented, burrowing owls should not be excluded from burrows unless or until:

- A Burrowing Owl Exclusion Plan (see Appendix E) is developed and approved by the applicable local DFG office;
- Permanent loss of occupied burrow(s) and habitat is mitigated in accordance with the Mitigating Impacts sections below. Temporary exclusion is mitigated in accordance with the item #1 under Mitigating Impacts below.
- Site monitoring is conducted prior to, during, and after exclusion of burrowing owls from their burrows sufficient to ensure take is avoided. Conduct daily monitoring for one week to confirm young of the year have fledged if the exclusion will occur immediately after the end of the breeding season.
- Excluded burrowing owls are documented using artificial or natural burrows on an adjoining mitigation site (if able to confirm by band re-sight).

Translocation (Active relocation offsite >100 meters). At this time, there is little published information regarding the efficacy of translocating burrowing owls, and additional research is needed to determine subsequent survival and breeding success (Klute et al. 2003, Holroyd et al. 2001). Study results for translocation in Florida implied that hatching success may be decreased for populations of burrowing owls that undergo translocation (Nixon 2006). At this time, the Department is unable to authorize the capture and relocation of burrowing owls except within the context of scientific research (FGC §1002) or a NCCP conservation strategy.

Mitigating impacts. Habitat loss and degradation from rapid urbanization of farmland in the core areas of the Central and Imperial valleys is the greatest of many threats to burrowing owls in California (Shuford and Gardali, 2008). At a minimum, if burrowing owls have been documented to occupy burrows (see Definitions, Appendix B) at the project site in recent years, the current scientific literature supports the conclusion that the site should be considered occupied and mitigation should be required by the CEQA lead agency to address project-specific significant and cumulative impacts. Other site-specific and regionally significant and cumulative impacts may warrant mitigation. The current scientific literature indicates the following to be best practices. If these best practices cannot be implemented, the lead agency or lead investigator may consult with the Department to develop effective mitigation alternatives. The Department is also available to assist in the identification of suitable mitigation lands.

1. Where habitat will be temporarily disturbed, restore the disturbed area to pre-project condition including decompacting soil and revegetating. Permanent habitat protection may be warranted if there is the potential that the temporary impacts may render a nesting site (nesting burrow and satellite burrows) unsustainable or unavailable depending on the time frame, resulting in reduced survival or abandonment. For the latter potential impact, see the permanent impact measures below.
2. Mitigate for permanent impacts to nesting, occupied and satellite burrows and/or burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owls impacted are replaced based on the information provided in Appendix A. Note: A

minimum habitat replacement recommendation is not provided here as it has been shown to serve as a default, replacing any site-specific analysis and discounting the wide variation in natal area, home range, foraging area, and other factors influencing burrowing owls and burrowing owl population persistence in a particular area.

3. Mitigate for permanent impacts to nesting, occupied and satellite burrows and burrowing owl habitat with (a) permanent conservation of similar vegetation communities (grassland, scrublands, desert, urban, and agriculture) to provide for burrowing owl nesting, foraging, wintering, and dispersal (i.e., during breeding and non-breeding seasons) comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals. The mitigation lands may require habitat enhancements including enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. If the mitigation lands are located adjacent to the impacted burrow site, ensure the nearest neighbor artificial or natural burrow clusters are at least within 210 meters (Fisher et al. 2007).
4. Permanently protect mitigation land through a conservation easement deeded to a non-profit conservation organization or public agency with a conservation mission, for the purpose of conserving burrowing owl habitat and prohibiting activities incompatible with burrowing owl use. If the project is located within the service area of a Department-approved burrowing owl conservation bank, the project proponent may purchase available burrowing owl conservation bank credits.
5. Develop and implement a mitigation land management plan to address long-term ecological sustainability and maintenance of the site for burrowing owls (see Management Plan and Artificial Burrow sections below, if applicable).
6. Fund the maintenance and management of mitigation land through the establishment of a long-term funding mechanism such as an endowment.
7. Habitat should not be altered or destroyed, and burrowing owls should not be excluded from burrows, until mitigation lands have been legally secured, are managed for the benefit of burrowing owls according to Department-approved management, monitoring and reporting plans, and the endowment or other long-term funding mechanism is in place or security is provided until these measures are completed.
8. Mitigation lands should be on, adjacent or proximate to the impact site where possible and where habitat is sufficient to support burrowing owls present.
9. Where there is insufficient habitat on, adjacent to, or near project sites where burrowing owls will be excluded, acquire mitigation lands with burrowing owl habitat away from the project site. The selection of mitigation lands should then focus on consolidating and enlarging conservation areas located outside of urban and planned growth areas, within foraging distance of other conserved lands. If mitigation lands are not available adjacent to other conserved lands, increase the mitigation land acreage requirement to ensure a selected site is of sufficient size. Offsite mitigation may not adequately offset the biological and habitat values impacted on a one to one basis. Consult with the Department when determining offsite mitigation acreages.
10. Evaluate and select suitable mitigation lands based on a comparison of the habitat attributes of the impacted and conserved lands, including but not limited to: type and structure of habitat being impacted or conserved; density of burrowing owls in impacted and conserved habitat; and significance of impacted or conserved habitat to the species range-wide. Mitigate for the highest quality burrowing owl habitat impacted first and foremost when identifying mitigation lands, even if a mitigation site is located outside of

a lead agency's jurisdictional boundary, particularly if the lead agency is a city or special district.

11. Select mitigation lands taking into account the potential human and wildlife conflicts or incompatibility, including but not limited to, human foot and vehicle traffic, and predation by cats, loose dogs and urban-adapted wildlife, and incompatible species management (i.e., snowy plover).
12. Where a burrowing owl population appears to be highly adapted to heavily altered habitats such as golf courses, airports, athletic fields, and business complexes, permanently protecting the land, augmenting the site with artificial burrows, and enhancing and maintaining those areas may enhance sustainability of the burrowing owl population onsite. Maintenance includes keeping lands grazed or mowed with weed-eaters or push mowers, free from trees and shrubs, and preventing excessive human and human-related disturbance (e.g., walking, jogging, off-road activity, dog-walking) and loose and feral pets (chasing and, presumably, preying upon owls) that make the environment uninhabitable for burrowing owls (Wesemann and Rowe 1985, Millsap and Bear 2000, Lincer and Bloom 2007). Items 4, 5 and 6 also still apply to this mitigation approach.
13. If there are no other feasible mitigation options available and a lead agency is willing to establish and oversee a Burrowing Owl Mitigation and Conservation Fund that funds on a competitive basis acquisition and permanent habitat conservation, the project proponent may participate in the lead agency's program.

Artificial burrows. Artificial burrows have been used to replace natural burrows either temporarily or long-term and their long-term success is unclear. Artificial burrows may be an effective addition to in-perpetuity habitat mitigation if they are augmenting natural burrows, the burrows are regularly maintained (i.e., no less than annual, with biennial maintenance recommended), and surrounding habitat patches are carefully maintained. There may be some circumstances, for example at airports, where squirrels will not be allowed to persist and create a dynamic burrow system, where artificial burrows may provide some support to an owl population.

Many variables may contribute to the successful use of artificial burrows by burrowing owls, including pre-existence of burrowing owls in the area, availability of food, predators, surrounding vegetation and proximity, number of natural burrows in proximity, type of materials used to build the burrow, size of the burrow and entrance, direction in which the burrow entrance is facing, slope of the entrance, number of burrow entrances per burrow, depth of the burrow, type and height of perches, and annual maintenance needs (Belthoff and King 2002, Smith et al. 2005, Barclay et al. 2011). Refer to Barclay (2008) and (2011) and to Johnson et al. 2010 (unpublished report) for guidance on installing artificial burrows including recommendations for placement, installation and maintenance.

Any long-term reliance on artificial burrows as natural burrow replacements must include semi-annual to annual cleaning and maintenance and/or replacement (Barclay et al. 2011, Smith and Conway 2005, Alexander et al. 2005) as an ongoing management practice. Alexander et al. (2005), in a study of the use of artificial burrows found that all of 20 artificial burrows needed some annual cleaning and maintenance. Burrows were either excavated by predators, blocked by soil or vegetation, or experienced substrate erosion forming a space beneath the tubing that prevented nestlings from re-entering the burrow.

Mitigation lands management plan. Develop a Mitigation Lands Management Plan for projects that require off-site or on-site mitigation habitat protection to ensure compliance with and effectiveness of identified management actions for the mitigation lands. A suggested outline and related vegetation management goals and monitoring success criteria can be found in Appendix E.

Mitigation Monitoring and Reporting

Verify the compliance with required mitigation measures, the accuracy of predictions, and ensure the effectiveness of all mitigation measures for burrowing owls by conducting follow-up monitoring, and implementing midcourse corrections, if necessary, to protect burrowing owls. Refer to CEQA Guidelines Section 15097 and the CEQA Guidelines for additional guidance on mitigation, monitoring and reporting. Monitoring is qualitatively different from site surveillance; monitoring normally has a specific purpose and its outputs and outcomes will usually allow a comparison with some baseline condition of the site before the mitigation (including avoidance and minimization) was undertaken. Ideally, monitoring should be based on the Before-After Control-Impact (BACI) principle (McDonald et al. 2000) that requires knowledge of the pre-mitigation state to provide a reference point for the state and change in state after the project and mitigation have been implemented.

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Appendix A. Burrowing Owl Natural History and Threats

Diet

Burrowing owl diet includes arthropods, small rodents, birds, amphibians, reptiles, and carrion (Haug et al. 1993).

Breeding

In California, the breeding season for the burrowing owl typically occurs between 1 February and 31 August although breeding in December has been documented (Thompson 1971, Gervais et al. 2008); breeding behavior includes nest site selection by the male, pair formation, copulation, egg laying, hatching, fledging, and post-fledging care of young by the parents. The peak of the breeding season occurs between 15 April and 15 July and is the period when most burrowing owls have active nests (eggs or young). The incubation period lasts 29 days (Coulombe 1971) and young fledge after 44 days (Haug et al. 1993). Note that the timing of nesting activities may vary with latitude and climatic conditions. Burrowing owls may change burrows several times during the breeding season, starting when nestlings are about three weeks old (Haug et al. 1993).

Dispersal

The following discussion is an excerpt from Gervais et al (2008):

> "The burrowing owl is often considered a sedentary species (e.g., Thomsen 1971). A large proportion of adults show strong fidelity to their nest site from year to year, especially where resident, as in Florida (74% for females, 83% for males; Millsap and Bear 1997). In California, nest-site fidelity rates were 32%–50% in a large grassland and 57% in an agricultural environment (Ronan 2002, Catlin 2004, Catlin et al. 2005). Differences in these rates among sites may reflect differences in nest predation rates (Catlin 2004, Catlin et al. 2005). Despite the high nest fidelity rates, dispersal distances may be considerable for both juveniles (natal dispersal) and adults (postbreeding dispersal), but this also varied with location (Catlin 2004, Rosier et al. 2006). Distances of 53 km to roughly 150 km have been observed in California for adult and natal dispersal, respectively (D. K. Rosenberg and J. A. Gervais, unpublished data), despite the difficulty in detecting movements beyond the immediate study area (Koenig et al. 1996)."

Habitat

The burrowing owl is a small, long-legged, ground-dwelling bird species, well-adapted to open, relatively flat expanses. In California, preferred habitat is generally typified by short, sparse vegetation with few shrubs, level to gentle topography and well-drained soils (Haug et al. 1993). Grassland, shrub steppe, and desert are naturally occurring habitat types used by the species. In addition, burrowing owls may occur in some agricultural areas, ruderal grassy fields, vacant lots and pastures if the vegetation structure is suitable and there are useable burrows and foraging habitat in proximity (Gervais et al 2008). Unique amongst North

American raptors, the burrowing owl requires underground burrows or other cavities for nesting during the breeding season and for roosting and cover, year round. Burrows used by the owls are usually dug by other species termed host burrowers. In California, California ground squirrel (*Spermophilus beecheyi*) and round-tailed ground squirrel (*Citellus tereticaudus*) burrows are frequently used by burrowing owls but they may use dens or holes dug by other fossorial species including badger (*Taxidea taxus*), coyote (*Canis latrans*), and fox (e.g., San Joaquin kit fox, *Vulpes macrotis mutica*; Ronan 2002). In some instances, owls have been known to excavate their own burrows (Thompson 1971, Barclay 2007). Natural rock cavities, debris piles, culverts, and pipes also are used for nesting and roosting (Rosenberg et al. 1998). Burrowing owls have been documented using artificial burrows for nesting and cover (Smith and Belthoff, 2003).

Foraging habitat. Foraging habitat is essential to burrowing owls. The following discussion is an excerpt from Gervais et al. (2008):

> "Useful as a rough guide to evaluating project impacts and appropriate mitigation for burrowing owls, adult male burrowing owls home ranges have been documented (calculated by minimum convex polygon) to comprise anywhere from 280 acres in intensively irrigated agroecosystems in Imperial Valley (Rosenberg and Haley 2004) to 450 acres in mixed agricultural lands at Lemoore Naval Air Station, CA (Gervais et al. 2003), to 600 acres in pasture in Saskatchewan, Canada (Haug and Oliphant 1990). But owl home ranges may be much larger, perhaps by an order of magnitude, in non-irrigated grasslands such as at Carrizo Plain, California (Gervais et al. 2008), based on telemetry studies and distribution of nests. Foraging occurs primarily within 600 m of their nests (within approximately 300 acres, based on a circle with a 600 m radius) during the breeding season."

Importance of burrows and adjacent habitat. Burrows and the associated surrounding habitat are essential ecological requisites for burrowing owls throughout the year and especially during the breeding season. During the non-breeding season, burrowing owls remain closely associated with burrows, as they continue to use them as refuge from predators, shelter from weather and roost sites. Resident populations will remain near the previous season's nest burrow at least some of the time (Coulombe 1971, Thomsen 1971, Botelho 1996, LaFever et al. 2008).

In a study by Lutz and Plumpton (1999) adult males and females nested in formerly used sites at similar rates (75% and 63%, respectively) (Lutz and Plumpton 1999). Burrow fidelity has been reported in some areas; however, more frequently, burrowing owls reuse traditional nesting areas without necessarily using the same burrow (Haug et al. 1993, Dechant et al. 1999). Burrow and nest sites are re-used at a higher rate if the burrowing owl has reproduced successfully during the previous year (Haug et al. 1993) and if the number of burrows isn't limiting nesting opportunity.

Burrowing owls may use "satellite" or non-nesting burrows, moving young at 10-14 days, presumably to reduce risk of predation (Desmond and Savidge 1998) and possibly to avoid nest parasites (Dechant et al. 1999). Successful nests in Nebraska had more active satellite burrows within 75 m of the nest burrow than unsuccessful nests (Desmond and Savidge

1999). Several studies have documented the number of satellite burrows used by young and adult burrowing owls during the breeding season as between one and 11 burrows with an average use of approximately five burrows (Thompsen 1984, Haug 1985, Haug and Oliphant 1990). Supporting the notion of selecting for nest sites near potential satellite burrows, Ronan (2002) found burrowing owl families would move away from a nest site if their satellite burrows were experimentally removed through blocking their entrance.

Habitat adjacent to burrows has been documented to be important to burrowing owls. Gervais et al. (2003) found that home range sizes of male burrowing owls during the nesting season were highly variable within but not between years. Their results also suggested that owls concentrate foraging efforts within 600 meters of the nest burrow, as was observed in Canada (Haug and Oliphant 1990) and southern California (Rosenberg and Haley 2004). James et al. (1997), reported habitat modification factors causing local burrowing owl declines included habitat fragmentation and loss of connectivity.

In conclusion, the best available science indicates that essential habitat for the burrowing owl in California must include suitable year-round habitat, primarily for breeding, foraging, wintering and dispersal habitat consisting of short or sparse vegetation (at least at some time of year), presence of burrows, burrow surrogates or presence of fossorial mammal dens, well-drained soils, and abundant and available prey within close proximity to the burrow.

Threats to Burrowing Owls in California

Habitat loss. Habitat loss, degradation, and fragmentation are the greatest threats to burrowing owls in California. According to DeSante et al. (2007), "the vast majority of burrowing owls [now] occur in the wide, flat lowland valleys and basins of the Imperial Valley and Great Central Valley [where] for the most part,...the highest rates of residential and commercial development in California are occurring." Habitat loss from the State's long history of urbanization in coastal counties has already resulted in either extirpation or drastic reduction of burrowing owl populations there (Gervais et al. 2008). Further, loss of agricultural and other open lands (such as grazed landscapes) also negatively affect owl populations. Because of their need for open habitat with low vegetation, burrowing owls are unlikely to persist in agricultural lands dominated by vineyards and orchards (Gervais et al. 2008).

Control of burrowing rodents. According to Klute et al. (2003), the elimination of burrowing rodents through control programs is a primary factor in the recent and historical decline of burrowing owl populations nationwide. In California, ground squirrel burrows are most often used by burrowing owls for nesting and cover; thus, ground squirrel control programs may affect owl numbers in local areas by eliminating a necessary resource.

Direct mortality. Burrowing owls suffer direct losses from a number of sources. Vehicle collisions are a significant source of mortality especially in the urban interface and where owls nest alongside roads (Haug et al. 1993, Gervais et al. 2008). Road and ditch maintenance, modification of water conveyance structures (Imperial Valley) and discing to control weeds in fallow fields may destroy burrows (Rosenberg and Haley 2004, Catlin and Rosenberg 2006) which may trap or crush owls. Wind turbines at Altamont Pass Wind Resource Area are known to cause direct burrowing owl mortality (Thelander et al. 2003). Exposure to

pesticides may pose a threat to the species but is poorly understood (Klute et al. 2003, Gervais et al. 2008).

Appendix B. Definitions

Some key terms that appear in this document are defined below.

Adjacent habitat means burrowing owl habitat that abuts the area where habitat and burrows will be impacted and rendered non-suitable for occupancy.

Breeding (nesting) season begins as early as 1 February and continues through 31 August (Thomsen 1971, Zarn 1974). The timing of breeding activities may vary with latitude and climatic conditions. The breeding season includes pairing, egg-laying and incubation, and nestling and fledging stages.

Burrow exclusion is a technique of installing one-way doors in burrow openings during the non-breeding season to temporarily exclude burrowing owls or permanently exclude burrowing owls and excavate and close burrows after confirming burrows are empty.

Burrowing owl habitat generally includes, but is not limited to, short or sparse vegetation (at least at some time of year), presence of burrows, burrow surrogates or presence of fossorial mammal dens, well-drained soils, and abundant and available prey.

Burrow surrogates include culverts, piles of concrete rubble, piles of soil, burrows created along soft banks of ditches and canals, pipes, and similar structures.

Civil twilight - Morning civil twilight begins when the geometric center of the sun is 6 degrees below the horizon (civil dawn) and ends at sunrise. Evening civil twilight begins at sunset and ends when the geometric center of the sun reaches 6 degrees below the horizon (civil dusk). During this period there is enough light from the sun that artificial sources of light may not be needed to carry on outdoor activities. This concept is sometimes enshrined in laws, for example, when drivers of automobiles must turn on their headlights (called lighting-up time in the UK); when pilots may exercise the rights to fly aircraft. Civil twilight can also be described as the limit at which twilight illumination is sufficient, under clear weather conditions, for terrestrial objects to be clearly distinguished; at the beginning of morning civil twilight, or end of evening civil twilight, the horizon is clearly defined and the brightest stars are visible under clear atmospheric conditions.

Conservation for burrowing owls may include but may not be limited to protecting remaining breeding pairs or providing for population expansion, protecting and enhancing breeding and essential habitat, and amending or augmenting land use plans to stabilize populations and other specific actions to avoid the need to list the species pursuant to California or federal Endangered Species Acts.

Contiguous means connected together so as to form an uninterrupted expanse in space.

Essential habitat includes nesting, foraging, wintering, and dispersal habitat.

Foraging habitat is habitat within the estimated home range of an occupied burrow, supports suitable prey base, and allows for effective hunting.

Host burrowers include ground squirrels, badgers, foxes, coyotes, gophers etc.

Locally significant species is a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA §15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G). Examples include a species at the outer limits of its known range or occurring in a unique habitat type.

Non-breeding season is the period of time when nesting activity is not occurring, generally September 1 through January 31, but may vary with latitude and climatic conditions.

Occupied site or occupancy means a site that is assumed occupied if at least one burrowing owl has been observed occupying a burrow within the last three years (Rich 1984). Occupancy of suitable burrowing owl habitat may also be indicated by owl sign including its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance or perch site.

Other impacting activities may include but may not be limited to agricultural practices, vegetation management and fire control, pest management, conversion of habitat from rangeland or natural lands to more intensive agricultural uses that could result in "take". These impacting activities may not meet the definition of a project under CEQA.

Passive relocation is a technique of installing one-way doors in burrow openings to temporarily or permanently evict burrowing owls and prevent burrow re-occupation.

Peak of the breeding season is between 15 April and 15 July.

Sign includes its tracks, molted feathers, cast pellets (defined as 1-2" long brown to black regurgitated pellets consisting of non-digestible portions of the owls' diet, such as fur, bones, claws, beetle elytra, or feathers), prey remains, egg shell fragments, owl white wash, nest burrow decoration materials (e.g., paper, foil, plastic items, livestock or other animal manure, etc.), possible owl perches, or other items.

Appendix C. Habitat Assessment and Reporting Details

Habitat Assessment Data Collection and Reporting

Current scientific literature indicates that it would be most effective to gather the data in the manner described below when conducting project scoping, conducting a habitat assessment site visit and preparing a habitat assessment report:

1. Conduct at least one visit covering the entire potential project/activity area including areas that will be directly or indirectly impacted by the project. Survey adjoining areas within 150 m (Thomsen 1971, Martin 1973), or more where direct or indirect effects could potentially extend offsite. If lawful access cannot be achieved to adjacent areas, surveys can be performed with a spotting scope or other methods.
2. Prior to the site visit, compile relevant biological information for the site and surrounding area to provide a local and regional context.
3. Check all available sources for burrowing owl occurrence information regionally prior to a field inspection. The CNDDB and BIOS (see References cited) may be consulted for known occurrences of burrowing owls. Other sources of information include, but are not limited to, the Proceedings of the California Burrowing Owl Symposium (Barclay et al. 2007), county bird atlas projects, Breeding Bird Survey records, eBIRD (http://ebird.org), Gervais et al. (2008), local reports or experts, museum records, and other site-specific relevant information.
4. Identify vegetation and habitat types potentially supporting burrowing owls in the project area and vicinity.
5. Record and report on the following information:
   a. A full description of the proposed project, including but not limited to, expected work periods, daily work schedules, equipment used, activities performed (such as drilling, construction, excavation, etc.) and whether the expected activities will vary in location or intensity over the project's timeline;
   b. A regional setting map, showing the general project location relative to major roads and other recognizable features;
   c. A detailed map (preferably a USGS topo 7.5' quad base map) of the site and proposed project, including the footprint of proposed land and/or vegetation-altering activities, base map source, identifying topography, landscape features, a north arrow, bar scale, and legend;
   d. A written description of the biological setting, including location (Section, Township, Range, baseline and meridian), acreage, topography, soils, geographic and hydrologic characteristics, land use and management history on and adjoining the site (i.e., whether it is urban, semi-urban or rural; whether there is any evidence of past or current livestock grazing, mowing, disking, or other vegetation management activities);
   e. An analysis of any relevant, historical information concerning burrowing owl use or occupancy (breeding, foraging, over-wintering) on site or in the assessment area;
   f. Vegetation type and structure (using Sawyer et al. 2009), vegetation height, habitat types and features in the surrounding area plus a reasonably sized (as supported with logical justification) assessment area; (Note: use caution in discounting habitat based on grass height as it can be a temporary condition variable by season and conditions (such as current grazing regime) or may be distributed as a mosaic).

g. The presence of burrowing owl individuals or pairs or sign (see Appendix B);
h. The presence of suitable burrows and/or burrow surrogates (>11 cm in diameter (height and width) and >150 cm in depth) (Johnson et al. 2010), regardless of a lack of any burrowing owl sign and/or burrow surrogates; and burrowing owls and/or their sign that have recently or historically (within the last 3 years) been identified on or adjacent to the site.

Appendix D. Breeding and Non-breeding Season Surveys and Reports

Current scientific literature indicates that it is most effective to conduct breeding and non-breeding season surveys and report in the manner that follows:

Breeding Season Surveys

Number of visits and timing. Conduct 4 survey visits: 1) at least one site visit between 15 February and 15 April, and 2) a minimum of three survey visits, at least three weeks apart, between 15 April and 15 July, with at least one visit after 15 June. Note: many burrowing owl migrants are still present in southwestern California during mid-March, therefore, exercise caution in assuming breeding occupancy early in the breeding season.

Survey method. Rosenberg et al. (2007) confirmed walking line transects were most effective in smaller habitat patches. Conduct surveys in all portions of the project site that were identified in the Habitat Assessment and fit the description of habitat in Appendix A. Conduct surveys by walking straight-line transects spaced 7 m to 20 m apart, adjusting for vegetation height and density (Rosenberg et al. 2007). At the start of each transect and, at least, every 100 m, scan the entire visible project area for burrowing owls using binoculars. During walking surveys, record all potential burrows used by burrowing owls as determined by the presence of one or more burrowing owls, pellets, prey remains, whitewash, or decoration. Some burrowing owls may be detected by their calls, so observers should also listen for burrowing owls while conducting the survey.

Care should be taken to minimize disturbance near occupied burrows during all seasons and not to "flush" burrowing owls especially if predators are present to reduce any potential for needless energy expenditure or burrowing owl mortality. Burrowing owls may flush if approached by pedestrians within 50 m (Conway et al. 2003). If raptors or other predators are present that may suppress burrowing owl activity, return at another time or later date for a follow-up survey.

Check all burrowing owls detected for bands and/or color bands and report band combinations to the Bird Banding Laboratory (BBL). Some site-specific variations to survey methods discussed below may be developed in coordination with species experts and Department staff.

Weather conditions. Poor weather may affect the surveyor's ability to detect burrowing owls, therefore, avoid conducting surveys when wind speed is >20 km/hr, and there is precipitation or dense fog. Surveys have greater detection probability if conducted when ambient temperatures are >20° C, <12 km/hr winds, and cloud cover is <75% (Conway et al. 2008).

Time of day. Daily timing of surveys varies according to the literature, latitude, and survey method. However, surveys between morning civil twilight and 10:00 AM and two hours before sunset until evening civil twilight provide the highest detection probabilities (Barclay pers. comm. 2012, Conway et al. 2008).

Alternate methods. If the project site is large enough to warrant an alternate method, consult current literature for generally accepted survey methods and consult with the Department on the proposed survey approach.

Additional breeding season site visits. Additional breeding season site visits may be necessary, especially if non-breeding season exclusion methods are contemplated. Detailed information, such as approximate home ranges of each individual or of family units, as well as foraging areas as related to the proposed project, will be important to document for evaluating impacts, planning avoidance measure implementation and for mitigation measure performance monitoring.

Adverse conditions may prevent investigators from determining presence or occupancy. Disease, predation, drought, high rainfall or site disturbance may preclude presence of burrowing owls in any given year. Any such conditions should be identified and discussed in the survey report. Visits to the site in more than one year may increase the likelihood of detection. Also, visits to adjacent known occupied habitat may help determine appropriate survey timing.

Given the high site fidelity shown by burrowing owls (see Appendix A, Importance of burrows), conducting surveys over several years may be necessary when project activities are ongoing, occur annually, or start and stop seasonally. (See Negative surveys).

Non-breeding Season Surveys

If conducting non-breeding season surveys, follow the methods described above for breeding season surveys, but conduct at least four (4) visits, spread evenly, throughout the non-breeding season. Burrowing owl experts and local Department staff are available to assist with interpreting results.

Negative Surveys

Adverse conditions may prevent investigators from documenting presence or occupancy. Disease, predation, drought, high rainfall or site disturbance may preclude presence of burrowing owl in any given year. Discuss such conditions in the Survey Report. Visits to the site in more than one year increase the likelihood of detection and failure to locate burrowing owls during one field season does not constitute evidence that the site is no longer occupied, particularly if adverse conditions influenced the survey results. Visits to other nearby known occupied sites can affirm whether the survey timing is appropriate.

Take Avoidance Surveys

Field experience from 1995 to present supports the conclusion that it would be effective to complete an initial take avoidance survey no less than 14 days prior to initiating ground disturbance activities using the recommended methods described in the Detection Surveys section above. Implementation of avoidance and minimization measures would be triggered by positive owl presence on the site where project activities will occur. The development of avoidance and minimization approaches would be informed by monitoring the burrowing owls.

Burrowing owls may re-colonize a site after only a few days. Time lapses between project activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance.

Survey Reports

Report on the survey methods used and results including the information described in the Summary Report and include the reports within the CEQA documentation:

1. Date, start and end time of surveys including weather conditions (ambient temperature, wind speed, percent cloud cover, precipitation and visibility);
2. Name(s) of surveyor(s) and qualifications;
3. A discussion of how the timing of the survey affected the comprehensiveness and detection probability;
4. A description of survey methods used including transect spacing, point count dispersal and duration, and any calls used;
5. A description and justification of the area surveyed relative to the project area;
6. A description that includes: number of owls or nesting pairs at each location (by nestlings, juveniles, adults, and those of an unknown age), number of burrows being used by owls, and burrowing owl sign at burrows. Include a description of individual markers, such as bands (numbers and colors), transmitters, or unique natural identifying features. If any owls are banded, request documentation from the BBL and bander to report on the details regarding the known history of the banded burrowing owl(s) (age, sex, origins, whether it was previously relocated) and provide with the report if available;
7. A description of the behavior of burrowing owls during the surveys, including feeding, resting, courtship, alarm, territorial defense, and those indicative of parents or juveniles;
8. A list of possible burrowing owl predators present and documentation of any evidence of predation of owls;
9. A detailed map (1:24,000 or closer to show details) showing locations of all burrowing owls, potential burrows, occupied burrows, areas of concentrated burrows, and burrowing owl sign. Locations documented by use of global positioning system (GPS) coordinates must include the datum in which they were collected. The map should include a title, north arrow, bar scale and legend;
10. Signed field forms, photos, etc., as appendices to the field survey report;
11. Recent color photographs of the proposed project or activity site; and
12. Original CNDDB Field Survey Forms should be sent directly to the Department's CNDDB office, and copies should be included in the environmental document as an appendix. (http://www.dfg.ca.gov/bdb/html/cnddb.html).

Appendix E. Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans

Whereas the Department does not recommend exclusion and burrow closure, current scientific literature and experience from 1995 to present, indicate that the following example components for burrowing owl artificial burrow and exclusion plans, combined with consultation with the Department to further develop these plans, would be effective.

Artificial Burrow Location

If a burrow is confirmed occupied on-site, artificial burrow locations should be appropriately located and their use should be documented taking into consideration:

1. A brief description of the project and project site pre-construction;
2. The mitigation measures that will be implemented;
3. Potential conflicting site uses or encumbrances;
4. A comparison of the occupied burrow site(s) and the artificial burrow site(s) (e.g., vegetation, habitat types, fossorial species use in the area, and other features);
5. Artificial burrow(s) proximity to the project activities, roads and drainages;
6. Artificial burrow(s) proximity to other burrows and entrance exposure;
7. Photographs of the site of the occupied burrow(s) and the artificial burrows;
8. Map of the project area that identifies the burrow(s) to be excluded as well as the proposed sites for the artificial burrows;
9. A brief description of the artificial burrow design;
10. Description of the monitoring that will take place during and after project implementation including information that will be provided in a monitoring report.
11. A description of the frequency and type of burrow maintenance.

Exclusion Plan

An Exclusion Plan addresses the following including but not limited to:

1. Confirm by site surveillance that the burrow(s) is empty of burrowing owls and other species preceding burrow scoping;
2. Type of scope and appropriate timing of scoping to avoid impacts;
3. Occupancy factors to look for and what will guide determination of vacancy and excavation timing (one-way doors should be left in place 48 hours to ensure burrowing owls have left the burrow before excavation, visited twice daily and monitored for evidence that owls are inside and can't escape i.e., look for sign immediately inside the door).
4. How the burrow(s) will be excavated. Excavation using hand tools with refilling to prevent reoccupation is preferable whenever possible (may include using piping to stabilize the burrow to prevent collapsing until the entire burrow has been excavated and it can be determined that no owls reside inside the burrow);
5. Removal of other potential owl burrow surrogates or refugia on site;
6. Photographing the excavation and closure of the burrow to demonstrate success and sufficiency;

7. Monitoring of the site to evaluate success and, if needed, to implement remedial measures to prevent subsequent owl use to avoid take;
8. How the impacted site will continually be made inhospitable to burrowing owls and fossorial mammals (e.g., by allowing vegetation to grow tall, heavy disking, or immediate and continuous grading) until development is complete.

Appendix F. Mitigation Management Plan and Vegetation Management Goals

Mitigation Management Plan

A mitigation site management plan will help ensure the appropriate implementation and maintenance for the mitigation site and persistence of the burrowing owls on the site. For an example to review, refer to Rosenberg et al. (2009). The current scientific literature and field experience from 1995 to present indicate that an effective management plan includes the following:

1. Mitigation objectives;
2. Site selection factors (including a comparison of the attributes of the impacted and conserved lands) and baseline assessment;
3. Enhancement of the conserved lands (enhancement of reproductive capacity, enhancement of breeding areas and dispersal opportunities, and removal or control of population stressors);
4. Site protection method and prohibited uses;
5. Site manager roles and responsibilities;
6. Habitat management goals and objectives:
    a. Vegetation management goals,
        i. Vegetation management tools:
            1. Grazing
            2. Mowing
            3. Burning
            4. Other
    b. Management of ground squirrels and other fossorial mammals,
    c. Semi-annual and annual artificial burrow cleaning and maintenance,
    d. Non-natives control – weeds and wildlife,
    e. Trash removal;
7. Financial assurances:
    a. Property analysis record or other financial analysis to determine long-term management funding,
    b. Funding schedule;
8. Performance standards and success criteria;
9. Monitoring, surveys and adaptive management;
10. Maps;
11. Annual reports.

Vegetation Management Goals

- Manage vegetation height and density (especially in immediate proximity to burrows). Suitable vegetation structure varies across sites and vegetation types, but should generally be at the average effective vegetation height of 4.7 cm (Green and Anthony 1989) and <13 cm average effective vegetation height (MacCracken et al. 1985*a*).
- Employ experimental prescribed fires (controlled, at a small scale) to manage vegetation structure;

Responses to Comment Set B1

B1-1 As stated in the Executive Summary (Section ES.1, Introduction and Background, "Overview of the Proposed Project) and in the Introduction (Section A.1.1, Project Details), the proposed Project would include installation of telecommunications equipment at Triton Substation in Temecula and Valley Substation in Menifee. Channel equipment would be installed in the existing Mechanical and Electrical Equipment Rooms (MEERs) at these substations. This same information is noted in Project Description Section B.3.2 (Telecommunications). Since these modifications are minor and require no ground disturbance they are not discussed in Section B.3.4 (Modifications to Existing Substations). To clarify that Section B.3.4 applies to the Valley Substation, the title of this section has been revised.

Project Description and Background

B1-2 Section A.3 of the EIR has been revised to include the United States Fish and Wildlife Service (USFWS) as an agency that may require permits and/or approvals prior to construction of the proposed Project. As stated in Section B.7 of the EIR, Applicant Proposed Measures, SCE intends to apply to participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). If SCE is approved as a Participating Special Entity (PSE) then consultation with the USFWS may be not be required. Should SCE not be approved as a PSE then the USACE would be a conduit for consultation with the USFWS under Section 7 of the federal Endangered Species Act (provided that the project would impact federally jurisdictional wetlands/waters). CEQA does not require that Section 7 consultation be initiated prior to the completion of an environmental document. This process is typically initiated once the environmental document is approved and alternative has been chosen. If the proposed Project would not impact any wetlands/waters that fall under the jurisdiction of the USACE, and there is no other federal nexus, then SCE would be required to consult with the USFWS under Section 10 of the federal Endangered Species Act.

In response to the need of surveys for specific listed species, protocol surveys for southwestern willow flycatcher (*Empidonax traillii extimus*), coastal California gnatcatcher (*Polioptila californica*), and least Bell's vireo (*Vireo bellii pusillus*) were conducted in both 2012 and 2014. Small mammal trapping events, focused on Stephens' kangaroo rat (*Dipodomys Stephensi*), were conducted within the Survey Area in both 2012 and 2014. A habitat assessment and protocol surveys for the federally endangered Quino checkerspot butterfly (*Euphydryas editha quino*) were conducted in 2013. Please refer to the SCE's PEA for additional survey information; the PEA is available on the CPUC Valley South project website.

B1-3 As stated in Section B.7 (Applicant Proposed Measures), SCE intends to apply to participate in and be approved as a PSE under the MSHCP.

B1-4 To clarify, approximately 230 existing distribution wood poles would be removed along the 115-kV distribution route. The distribution lines from the old wood poles would be moved onto the subtransmission poles installed as part of the Project, which includes 243 wood poles, 12 light-weight steel poles, and 30 tubular steel poles, as identified in Table B-1 (Typical Subtransmission Structures to be Installed).

B1-5 As stated in Section B.4.1 (Table B-4) it is anticipated that one or more of the six proposed temporary staging yards would be required to construct the proposed Project. All of the proposed staging yards were assessed for impacts to biological resources as part of the EIR. Four

of the six staging yards would occur within existing SCE facilities while the other two would occur on disturbed lands in industrial areas. Refer to Figure B-7 in the EIR for the location of each staging yard.

All of the access and spur roads, along with many of the laydown/staging areas are contained within the impact corridor shown on Figures C.5-1a through C.5-1d. The four potential staging areas not included in the Survey Area (refer to Figure B-7) were found to occur within existing SCE facilities or within disturbed/industrial areas that do not provide suitable habitat for sensitive wildlife. Impacts to biological resources, including permanent and temporary impacts to vegetation communities, were analyzed for the entire impact corridor. Acreages for vegetation communities and land cover types occurring within the impact corridor are presented in Table C.5-9 (Section C.5) of the EIR.

B1-6 Mitigation Measure BIO-4 (*Develop a Habitat Restoration and Monitoring Plan*), as described in Section C.5.4.2 of the EIR, requires that SCE prepare a Habitat Restoration and Monitoring Plan (HRMP) to explicitly identify the process by which all temporarily disturbed areas shall be restored to pre-construction conditions. This mitigation measure has been revised to include additional specificity as to the requirement of the HRMP to also address habitat restoration and/or creation required as compensation for impacts to sensitive vegetation communities. The HRMP will develop a schedule by which the creation/restoration of habitat will occur and will be driven by the targeted vegetation communities. Some creation/restoration activities may be limited to specific times of the year as to promote seed germination and/or container plant success and may not occur immediately after construction activities are complete in a specific area. It should be noted that if SCE becomes a PSE with the MSHCP, compensation for impacts to sensitive vegetation communities may be accomplished through participation and implementation of the MSHCP requirements and additional mitigation (i.e., Mitigation Measure BIO-3) may not be required.

B1-7 All proposed pull and tension, splicing, and guard structure sites included as part of the proposed Project are contained within the proposed impact corridor as shown on Figures C.5-1a through C.5-1d in Section C.5 of the EIR. Impacts to biological resources, including permanent and temporary impacts to vegetation communities, were analyzed for the entire impact corridor. Acreages for vegetation communities and land cover types occurring within the impact corridor are presented in Table C.5-9 (Section C.5) of the EIR. As stated in Section C.5 of the EIR it was assumed that impacts could occur within any portion of the impact corridor. As previously stated, all proposed pull and tension, splicing, and guard structure sites are located within the identified impact corridor; therefore, impacts to biological resources, related to these sites, have been analyzed in Section C.5.4.2 of the EIR. A biological monitor would be present for the placement of all guard structures so that components may be micro-sited to avoid direct impacts to sensitive resources.

B1-8 Refer to response to Comment B1-6, above.

B1-9 **Potential Health Risks of EMF.** As discussed in the Draft EIR, several reviews of multiple clinical and laboratory studies have not identified any causal link between exposure to magnetic fields at the levels encountered from transmission lines and cancer.

The results of epidemiological studies, which show an increased risk for childhood leukemia among populations living in the vicinity of power lines, form the basis for the World Health Organization (WHO) and California Department of Health Services (DHS) labeling electric

magnetic fields (EMF) as a possible carcinogen. The term "possible" denotes an exposure for which epidemiologic evidence points to a statistical association, but other explanations cannot be ruled out as the cause of that statistical association (e.g., bias and confounding) and experimental evidence does not support a cause-and-effect relationship.

Despite additional research, it has not prompted scientific organizations to recommend that the classification of "possible carcinogen" be changed to any other International Agency for Research on Cancer (IARC) category such as "probable" or "known human carcinogen" (SSI, 2008; ICNIRP, 2009; SCENIHR, 2009). The WHO and these more recent views have stressed the importance of reconciling the epidemiologic data on childhood leukemia and the lack of evidence from experimental studies through innovative research. Just like any other cancer, researchers believe that the development of childhood leukemia is influenced by a multitude of different factors (e.g., genetics, environmental exposures, and infectious agents) (Buffler et al., 2005; McNally et al., 2006).

Standards for Public Health Exposure to EMF. The Draft EIR points out that there are no State of California or national guidelines and regulations defining limits for public exposure to magnetic fields that could be used for evaluating impacts.

A number of local governments, states, and national and international bodies have adopted or considered guidelines, regulations or policies related to EMF exposure. The reasons for these actions have been varied; in some cases, the guidelines draw upon the experience of specific groups, such as industrial hygienists, to establish worker protections in environments where EMF levels are far in excess of exposures experienced by the general public. In other cases, related to limits for general public exposure, the actions can be attributed to maintaining a status quo of existing exposures or addressing public reaction to and perception of EMF as opposed to responding to the findings of any specific scientific research.

The focus of the guidelines and standards established by international groups, such as the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and the International Committee on Electromagnetic Safety (ICES), is not to set exposure levels related to effects from long-term exposure to low levels of EMF. Rather, the guidelines developed by these organizations are characterized as setting limits to protect against acute health effects (i.e., perception or the stimulation of nerves and muscles), those effects that occur upon direct exposure to EMF at the values specified. Although ICNIRP and ICES have the same objectives and used similar methods, the safety factors used by these two entities differ substantially with the recommended limits for magnetic field exposure of the general public differing accordingly.

The table below identifies exposure guidelines set by some of the entities discussed above and it is noted that the magnetic field levels are at least 50 times greater than the levels identified in the Field Management Plan, and as revised by SCE (see Final EIR, Section B.6.3, Table B-17) for the proposed Project.

Various Guideline Limits for EMF Exposure

Organization/Agency	Magnetic Field		Electric Field	
	General Public	Occupational	General Public	Occupational
International				
ICNIRP	2,000 mG	10,000 mG	4.2 kV/m	10 kV/m
ICES	9,040 mG	N/A	5 kV/m 10 kV/m (a)	20 kV/m

National				
ICGIH	N/A	10,000	N/A	25 kV/m
OSHA	N/A	No adopted limits	N/A	No adopted limits
California				
CPUC	No adopted limits	No adopted limits	No adopted limits	No adopted limits

Sources:

Buffler PA, Kwan ML, Reynolds P, Urayama KY. 2005. Environmental and Genetic Risk Factors for Childhood Leukemia: Appraising the Evidence.

ICNIRP (International Commission on Non-Ionizing Radiation Protection), Standing Committee on Epidemiology. 2009. Guidelines for limiting exposure to time-varying electric, magnetic, and electromagnetic fields up to 300 GHz, Health Physics.

McNally RJ, Parker L. 2006. Environmental Factors and Childhood Acute Leukemias and ymphomas.

SCENIHR (Scientific Committee on Emerging and Newly Identified Health Risks). 2009. Health Effects of Exposure to EMF.

SSI's Independent Expert Group on Electromagnetic Fields, Swedish Radiation Protection Agency. 2008. Recent Research on EMF and Health Risks: Fifth Annual Report, Revised edition.

Aesthetics

B1-10 As stated in the Draft EIR Section C.2.1.12.2 (Approach to Data Collection and Regional Setting), KOPs were generally selected to be representative of the various types of views of the proposed Project (e.g., in-line, or perpendicular) while capturing different Project aspects (e.g., new subtransmission line, replacement of existing structures, or replacement of existing conductors only) and evaluating the potential impacts on different landscapes and viewing populations (e.g., residents, travelers on roadways, or pedestrians on recreational trails). The group of selected KOPs was considered a reasonable representation of available proposed Project views, and while more KOPs could have been utilized, the overall conclusions would not have changed. Specific considerations for each KOP included the following.

KOP 1 – This in-line view north along a paved portion of Leon Road captures a portion of the proposed Project that would parallel the east side of Leon Road and introduce new facilities where none presently exist. It also includes a backdrop by a major middleground terrain feature in the otherwise predominantly flat, rural valley landscape.

KOP 2 – This perpendicular view to the east along Domenigoni Parkway illustrates (a) the replacement of an existing facility with the new, larger facility, and (b) the span of a major travel corridor in the Project area. It also illustrates one aspect of the visual impact on views to the more distant, but regionally prominent San Gorgonio Mountains.

KOP 3 – This view to the northeast along an un-paved and relatively un-developed portion of Leon Road captures a slightly more complex, in-line view of the proposed Project with a turn around a foreground topographic feature. It also shows the replacement of existing wood poles

with taller wood poles that incorporate a shift in position to the east as well as a mix of wood and steel poles.

KOP 4 – This in-line view is representative of north-bound views along Leon Road, where the proposed Project parallels the west side of Leon Road and passes in front of rural residences. This view also illustrates the replacement of existing wood poles with taller wood poles.

KOP 5 – This view to the north from the recreational trail adjacent to Leon Road is illustrative of the visual effects of the proposed Project where it would pass through newer, developed residential areas where the majority of existing utilities have been placed underground. The view shows the addition of a prominently visible wood-pole line, where none presently exist in the suburban landscape.

KOP 6 – This generally perpendicular view to the southwest captures the span of SR- 79, another major roadway in the proposed Project area but from a different view direction. In this view, the poles are skylined (have minimal backdrop), which shows their structural prominence. As with other spans, the new poles would be taller than the existing poles.

KOP 7 – This location provides a view to the east along Benton Road and illustrates both the span of a roadway and the interconnection to an existing line.

KOP 8 – This perpendicular view to the west-southwest along westbound Murrieta Hot Springs Road illustrates the visual effect of conductor replacement as viewed from a major cross-valley roadway.

KOP 9 – This in-line view to the north from Suzi Lane illustrates the visual effect of conductor replacement along a portion of the proposed Project as it passes through a residential area. This viewpoint also captures the variable terrain on which the Project would be located, affording a variety of viewing angles and perspectives.

KOP 10 – This KOP captures an eastbound view of Alternative 1 and illustrates the visual effect of adding a new line on the opposite side of a roadway from an existing, smaller line (instead of co-locating the two facilities on common poles as proposed elsewhere). This viewpoint location was also important for illustrating the effects on views toward Mount San Jacinto.

B1-11 In reference to the Linear Viewpoint Analysis for KOP 2 (see Section C.2.1.2, Environmental Setting by Segment), the commenter questions the validity of the assumed traffic conditions (i.e., travel speed of 65 miles per hour) that contribute to the calculation of viewing duration. Clearly, traffic conditions will affect traffic speeds. During commute hours, traffic speeds would likely be lower, while traffic speeds during non-commute hours would be greater. Signalization at the intersection of Domenigoni Parkway and Leon Road would also affect travel speed. Therefore, it should be understood that utilizing the posted speed limits in the view duration calculations provides approximate or relative view durations from which to make comparisons. In some cases, the view durations would be less than calculated, and in some cases the view durations would be greater than calculated. While the absolute view durations could vary somewhat, relative view durations would remain consistent among the various categories of visibility (see EIR Table C.2-1, Domenigoni Parkway Linear Viewpoint Analysis). Therefore, the use of the posted speed limit in the view duration calculations is considered reasonable.

The commenter also asserts that including road segments past the span (where the span would no longer be visible) in the visibility calculations is highly arbitrary (EIR Table C.2-1). However,

this assertion misses the purpose of the linear viewpoint analysis, which has been conducted to answer the question: "To what extent would the driving experience along Domenigoni Parkway in Domenigoni Valley be affected by the proposed Project?" As noted in both EIR Section C.2.1.2 and Figure C.2-3c, the overall affected travel distance is utilized in the calculations because all of the road segments (including those past the span) provide important viewing opportunities that contribute to the overall viewing experience along Domenigoni Parkway in Domenigoni Valley. For example, while one could assume from the conclusions presented for KOP 2 that the proposed Project would substantially affect the eastbound viewing experience along Domenigoni Parkway in Domenigoni Valley, Figure C.2-3c and Table C.2-1 actually tell us that the majority of the eastbound views of Mount San Jacinto and the San Jacinto Mountains would be unaffected by the proposed Project because said views would occur east of (or past) the transmission line span at Leon Road. This is an important distinction in determining the extent to which the proposed Project would affect views along Domenigoni Parkway. Therefore, the inclusion of non-impacted road segments is not considered arbitrary but, in fact is integral to the full understanding of the viewing context, and accurate characterization of the proposed Project's effects on the overall viewing experience along this important roadway.

B1-12 The commenter asserts that in the context of a moderate to high visual sensitivity, the resulting visual impact of the taller, more prominent poles and conductors should be classified as significant, and not less than significant as presented in the EIR for KOP 4. As noted in EIR Section C.2.4.2 (Impact Analysis – Direct and Indirect Effects), the less-than-significant impact conclusion is based in large part on the attenuation of the incremental visual impact by the structural context provided by the existing poles and conductor, without which the resulting visual effect would be substantially greater. Specifically, the existing poles and conductor exhibits structural form, line, and color; structure skylining; and industrial character, similar to that which would occur with implementation of the proposed Project. Though the resulting less-than-significant impact conclusion is a judgment call of the visual specialist, the conclusion is reasonable given the existing landscape characteristics and anticipated Project outcome.

B1-13 The commenter notes that the EIR determined a high level of visual sensitivity for the landscape visible from KOP 5, which is consistent with the EIR conclusion.

B1-14 The commenter disagrees with the KOP 6 impact conclusion, asserting that in the context of a moderate to high visual sensitivity, the resulting visual impact of the taller, more prominent poles and conductors should be classified as significant, and not less than significant as presented in the EIR. As noted in EIR Section C.2.4.2 (Impact Analysis – Direct and Indirect Effects), although the resulting incremental visual impact is considered adverse, it would be less than significant based in large part on the attenuation of the incremental visual impact by the structural context provided by the existing poles and conductor, without which the resulting visual effect would be substantially greater. Specifically, the existing poles and conductor exhibits structural form, line, and color; structure skylining; and industrial character similar to that which would occur with implementation of the proposed Project, though the resulting structural prominence would be greater. Although the resulting less-than-significant impact conclusion represents a judgment call of the visual specialist, the conclusion is reasonable given the existing landscape characteristics and anticipated project outcome.

B1-15 The commenter disagrees with the EIR's no impact conclusion under Criterion AES3 (*Would the Project have a substantial adverse effect on a scenic vista?*) because the CEQA Guidelines address "scenic vistas" in a general sense and are not limited to officially designated vistas. As

discussed in the EIR under Criterion AES3 (Section C.2.4.2), scenic vistas are frequently officially designated by public agencies and are often signed and accessible to the public for the express purposes of viewing and sightseeing. Although not all scenic vistas are "officially designated," they would typically at least be known to the general public or community as a location or destination for scenic viewing. As pointed out in the EIR, there are no such officially designated or community recognized scenic vistas in the proposed Project study area. Therefore, the no impact conclusion under Criterion AES3 is reasonable. Also, as noted in the EIR, although there are expansive views of the surrounding landscape throughout the proposed Project study area, such views are adequately captured with the selected KOPs, none of which would be considered specific scenic viewing destinations.

B1-16 The commenter inaccurately states that the EIR concludes that the construction of the proposed Project, in combination with the potential construction of other projects, could lead to significant, cumulative visual impacts. While the EIR concludes that such impacts could be substantial (see Section C.2.4.4, Cumulative Impacts), they would not exceed the significant (Class I) impact threshold. In fact, none of the anticipated cumulative construction or operational impacts is expected to be significant.

The commenter disagrees with the EIR conclusion that construction would not result in significant, cumulative visual effects due to the presence of equipment, vehicles, materials, and workforce (Impact AES-1) because not all of the equipment and materials would be completely screened from view at all times (particularly at staging areas). In addition, the presence of equipment, materials, and workforce would be temporary in nature and would, therefore, not result in a long-term visual impact that would be considered significant.

B1-17 The commenter disagrees with the EIR's conclusion that the proposed Project would not result in cumulative operational impacts when compared to the two identified relevant projects (Project No. 24 - cell tower and Project No. 37 - transmission line replacement). As discussed in the EIR (see Section C.2.4.4, Criterion AES1 under Operational Impacts), while the cell tower (Project No. 24) would be marginally within the field of view of the proposed Project, the incremental changes made to the tower would be minimally noticeable, and from some vantage points would be very difficult to discern when backdropped by the terrain to the west. Therefore, it is reasonable to conclude that while the cumulative visual impact of the proposed Project combined with Project No. 24 could be adverse, it would be less than significant (Class III). Additionally, the reconfiguration of an existing subtransmission line (Project No. 37) south of the proposed Project would be visible within the same field of view as the conductor replacement aspect of the proposed Project (Segment 2), which would only involve the replacement of existing conductors with slightly larger diameter conductors. As a result, the incremental change would largely go unnoticed by the casual observer, as would the replacement and reconfiguration of Project No. 37. Therefore, it is reasonable to conclude that while the cumulative visual impact of the proposed Project combined with Project No. 37 could be adverse, it would be less than significant (Class III).

The commenter also suggests that the urban/suburban development projects in Table C.1-1 should have been considered in combination with the proposed Project because significant cumulative impacts would result. As noted in EIR Section C.2.4.4, the 31 urban/suburban projects would not exhibit the industrial characteristics similar to the proposed Project, and the casual observer would not perceive any type of visual association or comparability between the urban/suburban development projects and the proposed subtransmission line. Therefore, it is

reasonable to drop those 31 urban/suburban development projects from further cumulative visual analysis.

B1-18 The commenter notes a discrepancy between the identification of two significant (Class I) impact locations in Table C.2-3 and only one Class I impact discussion in the text (at KOP 5). The commenter is correct in that Table C.2-3 was not updated following the completion of a linear viewpoint analysis for KOP 2. The text in Table C.2-3 (Reason for Conclusion for AES-6) has been revised.

The commenter also states that photos of KOP 10 were not provided for the alternative route, which is incorrect. EIR Figures D-2a and D-2b in Section D (Alternatives) present the exiting and simulated views for Alternatives 1 along Scott Road just east of El Centro Lane (KOP 10). For Alternative 2, a viewpoint along Scott Road at Menifee Road (Viewpoint A) is presented in Figure D-3, and another viewpoint from Mussa Lane just east of Whitewood Road is presented in Figure D-4 (Viewpoint B).

Agriculture

B1-19 As noted in the comment and stated in EIR Impact AG-1, the proposed Project would permanently convert 5.92 acres of Farmland to non-agricultural use. This is not considered a significant impact as it is less than the minimum area necessary for sustainable agriculture, as stated on Draft EIR page C.3-11. The proposed Project's poles, anchors, and access roads would occupy these Farmlands (5.92 acres), which would not inherently remove an obstacle to growth of residential development in the community. As discussed in Section C.3.4.3 (Cumulative Impacts), cumulative projects, which include a large number of new housing developments, could result in the conversion of Farmland (if developed); however, the proposed Project's contribution to this cumulative impact is not cumulatively considerable because the Project's infrastructure would primarily be placed within an existing utility corridor and the area needed for new right-of-way (ROW) would not directly impact Prime Farmland or substantially impede the use of land for agricultural uses. The growth-inducing effects of the Project are analyzed in EIR Section E.4. As stated, growth in the Project area is expected to occur with or without implementation of the Project. The proposed Project would accommodate future load growth in a timely manner and would be consistent with local planning documents and policies regarding population growth. While the Project would not directly result in growth in the area, the EIR acknowledges that its implementation would remove future obstacles to population growth by facilitating the transmission of future projected power generation in the Project area.

B1-20 The Projects impacts to Agricultural Preserve lands would be a permanent conversion of approximately 0.79 acres, which is considered to be a negligible loss. The potential cumulative impacts are addressed in Section C.3.4.3.

CEQA Section 15130 (Discussion of Cumulative Impacts), states that an EIR "shall discuss cumulative impacts of a project's incremental effect is cumulatively considerable as defined in section 15065(a)(3)." Section 15065 (a)(3) defines cumulatively considerable as "…incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of other future projects." The analysis has considered the project's effect in relation to other projects in the area (past, present, and future) and determined that the incremental contribution of the project would not contribute to significant cumulative impacts to agricultural resources.

Air Quality

B1-21 The total disturbed area for the proposed Project over its construction life may be over 50 acres; however, the definition of a large operation is any "active operation on property which contains 50 or more acres of disturbed surface area; or any earth moving operation with a daily earth-moving or throughput volume of 3,850 cubic meters (5,000 cubic yards) or more three times during the most recent 365-day period." This linear project would be constructed over 16 months, with much of the disturbance being temporary, and so would not have active operations on 50 or more acres at any one time. Therefore, the proposed Project would not meet the definition of a large operation.

Additionally, South Coast Air Quality Management District (SCAQMD) Rule 403 does not actually require a fugitive dust plan for defined large operations, although such plans can be submitted. The requirement is the submittal of a Large Operation Notification along with recordkeeping to show compliance with the Large Operation requirements of this rule.

Text has been added to Final EIR Section C.4.2.3 (Local) under "South Coast Air Quality Management District" to clarify the Rule 403 requirements and the Project assumptions related to Rule 403 defined Large Operations.

B1-22 Appendix 2 includes the air quality calculations for this project. Tables provided in Section C.4 (Air Quality) summarize the results of the calculations and, where applicable, each table cross-references the reader to Appendix 2 (corrected in the Final EIR from Appendix 3 to Appendix 2). The emissions estimates were prepared using accepted methodologies and provided to SCAQMD for review. The SCAQMD did not provide any comments on the emissions estimates.

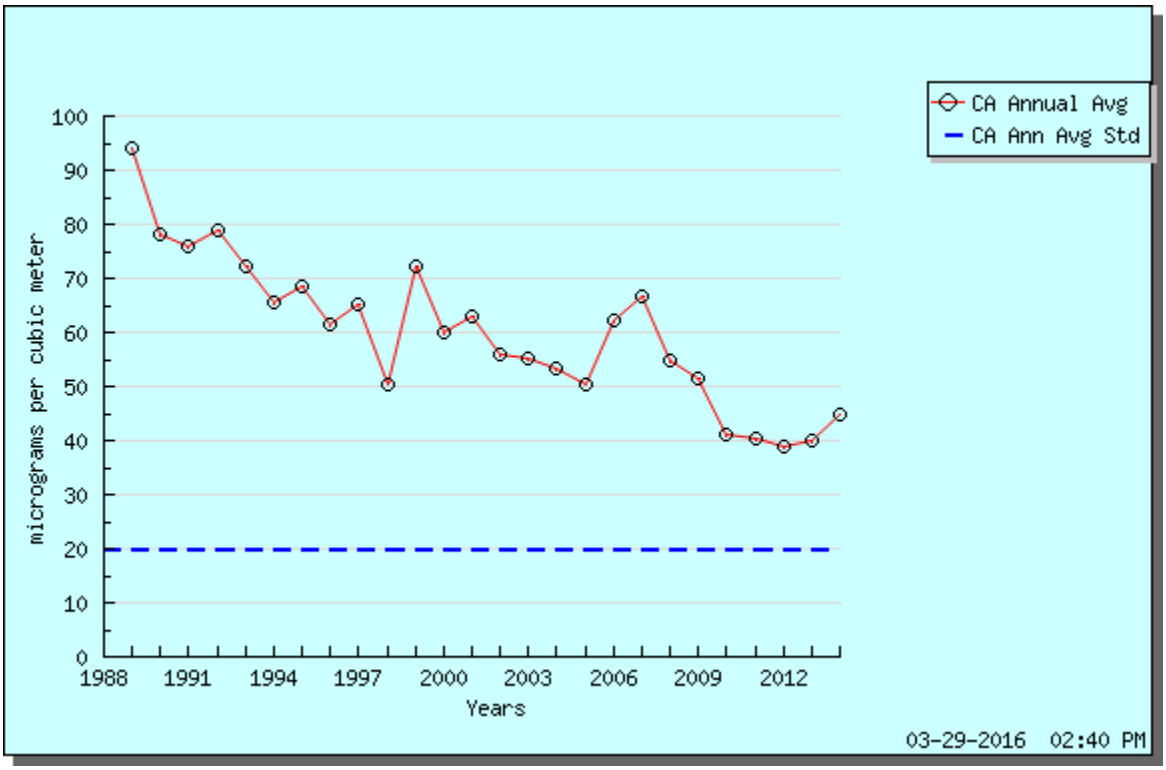
With respect to vehicle speeds on unpaved roads, the assumption used for unpaved roads speed control is based on the SCAQMD CEQA website reference cited at the bottom of Table 37 in Appendix 2 (TABLE XI-A MITIGATION MEASURE EXAMPLES: FUGITIVE DUST FROM CONSTRUCTION & DEMOLITION). That reference notes a linear relationship between the uncontrolled emissions factor, based on 35 miles per hour, and the controlled factor for lower speeds. The use of this reference, which is appropriate for the construction site/private unpaved roads, would be conservative for public unpaved roads. For public unpaved roads, the SCAQMD TABLE XI-D MITIGATION MEASURE EXAMPLES: FUGITIVE DUST FROM UNPAVED ROADS reference would likely be more appropriate. Had that reference been used instead, which assumes a linear relationship for emissions control based on an uncontrolled speed of 45 miles per hour, the emissions control factor would have been increased from the 29 percent [(35-25/35)] that was used to 44 percent [(45-25)/45]. Therefore, the emissions from the public unpaved road travel was likely somewhat overestimated.

B1-23 The determination of localized significance thresholds (LSTs) for Impact AQ-4 are based on the SCAQMD LST threshold table, the construction area size, and the distance to the nearest receptor. This is noted in Table C.4-7 (SCAQMD LST and TACs Air Quality Emissions Significance Thresholds), and the text around this table provides the rationale used to determine the lookup area within the SCAQMD table for the different types and areas of construction for the Project. The analysis estimates that the emissions from the marshalling yards would be reduced to 2.74 lbs/day with implementation of the various control measures and the recommended mitigation measures. Appendix 2 provides both controlled and uncontrolled emissions estimates, and provides the control assumptions used to determine the control efficiencies. Specifically, the marshalling yard assumptions relate to the control of unpaved road fugitive dust emissions

based on graveling the surface and controlling vehicle speed within the yard to 10 mph. These assumptions are detailed under the "Motor Vehicle Fugitive Particulate Matter Emissions" table within Table 9 (Subtransmission Line Construction Emissions Marshalling Yard) in the controlled emissions portion of Appendix 2.

B1-24 The table reference in the Final EIR Under Impact AQ-5 should have identified Table C.4-7 (the Final EIR has been changed to identify Table C.4-7). The Project's emissions do not include acutely hazardous air contaminants. As noted in the impact analysis, the TAC emissions are primarily comprised of diesel particulate matter (DPM) emissions. This pollutant can have long-term cancer impacts and other long-term chronic impacts; however, given the long linear layout of this Project there would not be a substantial amount of DPM emissions in any one area and the timeframe for emissions in any area would be very limited; therefore, the total DPM emissions exposure to any specific receptor would not have the potential to exceed SCAQMD health risk thresholds. SCAQMD did not request the completion of a Health Risk Assessment or have any comments on the Draft EIR.

B1-25 Air quality has improved within the South Coast Air Basin over time. Stage 1 and Stage 2 smog alerts that were common in the past have not occurred in over a decade. Great strides have been made in reducing pollutant concentrations within the air basin. While some PM10 data shows fairly flat recent trends, PM10 in the basin as a whole improved to the point that the air basin was designated as attainment of the federal PM10 standard in 2013. A graph of the air basin's PM10 annual average reported by the California Air Resources Board (http://www.arb.ca.gov/adam/trends/trends1.php) shows how average PM10 concentrations have improved over time.



B1-26 Criterion AQ-2 strictly relates to the Project's ability to cause a new violation or contribute to an existing or projected air quality violation. Violations of air quality standards are not the same as exceedances of ambient air quality standards. Violations of air quality standards are based on actual monitoring data at the specific monitoring station sites located within the air basin.

As noted in the impact analysis, the proposed Project would not cause emissions of a magnitude to cause or substantially contribute to air quality violations. The magnitude of emissions necessary to cause or substantially contribute to violations of an air quality standard recorded at the nearest monitoring stations would be orders of magnitude greater than the emissions that would occur during the construction of the proposed Project or from the known cumulative projects. This criterion better relates to the potential impacts of major stationary sources like power plants or refineries or major transportation hubs like major seaports or airport or railyards. Also, this criterion should not be confused with Criteria AQ-3 and AQ-4 (and associated impacts AQ-3 and AQ-4) that assess, based on the SCAQMD regional and LST thresholds, the potential for the Project to cause SCAQMD defined regional air quality impacts or potentially cause near-field pollutant exceedances (not violations) of standards or substantial contributions to existing exceedances of standards.

B1-27 In assessing cumulative impacts there are many factors to consider, including the fact that the Project is linear with emissions constantly moving over a 15.4-mile route, and that some of the emissions (on-road emissions) occur away from the construction site areas. Additionally, the high-peak daily regional emissions shown for the proposed Project consider the absolute worst-case potential for overlapping construction phases that would occur all along the 15.4-mile Project route. The peak emissions at any given site is well below the SCAQMD regional thresholds, as can be seen in the Impact AQ-4 analysis for localized impacts; specifically, the construction site emissions shown in Tables C.4-10 and C.4-11 for all pollutants are a small fraction of the SCAQMD regional emissions thresholds. While the proposed Project's schedule and worst-case emission potential have been estimated, the emissions estimates or specific construction schedules are not available for most of the identified cumulative projects. In fact, there is the potential that many of these projects may never be built or be built years after the proposed Project has completed construction. In the context of the known Project's linear emissions estimate and the available cumulative project information, it was determined that Project emissions that could occur cumulatively within one mile of other project emissions would not create cumulative significant regional or localized impacts or be cumulatively considerable with the emissions of those other projects, if those other projects were determined to have significant air quality impacts.

B1-28 Please see response to Comment B1-27, above.

Biological Resources

B1-29 All of the access and spur roads, along with many of the laydown/staging areas are contained within the impact corridor identified on Figures C.5-1a through C.5-1d. The four potential staging areas not included in Survey Area (refer to Figure B-7) were found to occur within existing SCE facilities or within disturbed/industrial areas that do not provide suitable habitat for sensitive wildlife. Table C.5-1 in the Final EIR has been revised to note that these four potential staging areas were surveyed, but because of their location/condition were not included in the Survey Area.

The impact corridor occurs within a variety of land uses including agriculture, open space, and developed/residential; some of these areas already contain some type of transmission structure(s). A 500-foot wide survey area is typical for linear projects of this nature and has been used for analysis on other transmission line projects of a similar size.

B1-30 Section C.5.2.3 of the Final EIR has been revised to include additional information on the location of the proposed Project in relation to Area Plans described in the MSHCP.

B1-31 Refer to response to Comment B1-6, above.

B1-32 As stated in Section C.5.4.2 of the EIR, the location of some project components will not be determined until final construction plans are developed (i.e., access/spur roads, splicing setup areas, etc.) or at the time of construction (i.e., anchors). Permanent and temporary impacts associated with these components would occur within the same types of habitats and impact the same resources as for the known locations and would be subject to the same mitigation measures. Impacts related to these additional components would not change any of the significance determinations made in the EIR. Table C.5-8 in the EIR provides a summary of the types and acreages of these additional impacts. While the exact location of components presented in Table C.5-8 is not known at this time, the dimensions provided in Table B-7 were used to calculate the total acreage of impact resulting from these components and resulted in the acreages presented in Table C.5-8. Table B-7, in Section B.4.6.7 of the EIR, provides the dimensions, estimated impact acreages, and estimated numbers for individual project components with tentative locations identified by SCE.

B1-33 As stated under Impact BIO-1, the majority of VSSP related impacts (permanent and temporary) would occur within disturbed/ruderal habitat, agricultural lands, and urban/developed areas. Impacts would include a total of 0.20 acres of permanent and 6.16 acres of temporary impacts to riparian habitats or sensitive natural communities. The proposed impact corridor for the VSSP is shown on Figures C.5-1a through C.5-1d in the EIR. These figures show the location of vegetation communities and land cover types occurring within both the survey area and impact corridor. Table C.5-9 of the EIR lists each of the vegetation communities and land cover types that occur within the proposed impact corridor, including sensitive communities, along with the acreages of permanent and temporary impacts.

B1-34 Mitigation Measure BIO-4 (*Develop a Habitat Restoration and Monitoring Plan*), as described in Section C.5.4.2 the EIR, requires that SCE prepare a Habitat Restoration and Monitoring Plan (HRMP) to explicitly identify the process by which all temporarily disturbed areas shall be restored to pre-construction conditions.

B1-35 As presented in Table C.5-9 in the EIR, approximately 15.44 acres on non-native grassland occur within the proposed impact corridor of the VSSP. Although non-native grasslands have the potential to support special-status species (i.e., Stephens's kangaroo rat) it is not considered a sensitive community; however, because of its potential to support special status species, it is subject to a 1:1 compensation ratio for impacts as described under Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*). Mitigation Measure BIO-16 (*Compensate for Permanent Impacts to Stephens' Kangaroo Rat*) requires that if construction activities must occur within occupied Stephens's kangaroo rat habitat SCE must compensate for the impacts by acquiring parcels of suitable habitat at a ratio of 4:1. The acquired parcels must be comprised of grassland or open sage scrub habitat that would help to offset impacts to annual grassland habitats.

B1-36 The Worker Environmental Education Program, renamed to Worker Environmental Awareness Program (WEAP) in the Final EIR, is intended to educate all on-site personnel to the sensitive biological resources that occur on or near the VSSP, ensure that personnel are aware of the laws/regulations protecting these resources, and make clear any special VSSP related requirements. For example, the WEAP will discuss protocols to be followed when road kill is encountered. This will involve notification to the appropriate agency and on-site biological staff; other than the notification, VSSP construction personnel will not be directly involved with instances of road kill.

The WEAP is intended as an educational tool and on-site personnel will not be expected to identify wildlife to species. Mitigation Measure BIO-5 (*Implement Biological Construction Monitoring*) requires that a qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special-status species. The construction personnel will be instructed to alert the qualified biologist when wildlife is observed and the biologist will be responsible for identifying the species and determining if work can continue.

B1-37 Compliance with Best Management Practices (BMPS) will be done on a daily basis as part of VSSP requirements. The annual report required as part of Mitigation Measure BIO-2 (*Implement Best Management Practices*) is intended to provide a summary of compliance issues and subsequent remedial actions that occurred within the previous year. As stated in Mitigation Measure BIO-2, prior to ground disturbance of any kind the VSSP work areas shall be clearly delineated by stakes, flags, or other clearly identifiable system. The delineation of the work areas allows for high visibility of work limits to on-site construction personnel and prevent additional impacts to sensitive biological resources. Mitigation Measure BIO-5 (*Implement Biological Construction Monitoring*) requires that a qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special-status species; the biologist will ensure that all construction activities are within approved (delineated) work areas.

A speed limit of 15 miles per hour will be maintained for all onsite unpaved roads within the VSSP. Mitigation Measure AQ-1 (*Fugitive Dust Control*) identifies a speed limit of 15 miles per hour for private unpaved roads and a speed limit of 25 miles per hour for public unpaved roads. There is no conflict between these two measures because MM BIO-2 refers to onsite roads and MM AQ-1 only allows a higher speed for offsite public unpaved roads where a speed limit may already be posted, where soil is likely to be more compacted because of more frequent use as a public road, and where traffic other than project-related traffic would occur. For safety reasons, the higher speed limit was identified for offsite public unpaved roads.

As stated under Mitigation Measure BIO-2 all general trash, food-related trash items (e.g., wrappers, cans, bottles, food scraps, cigarettes, etc.) and other human-generated debris will be stored in animal proof containers and/or removed from the site each day. This measure also states that vehicles or equipment shall not be refueled within 100 feet of an ephemeral drainage or wetland unless a bermed and lined refueling area is constructed; the bermed and lined area would be such that any spills would be wholly contained within the refueling area and not impact or enter any drainage feature.

Mitigation Measure BIO-2 requires compliance with all local, State and federal regulations when using chemicals, fuels, lubricants, or biocides. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California

Department of Food and Agriculture, and other State and federal legislation, as well as additional VSSP-related restrictions deemed necessary by the USFWS and CDFW. This measure has been revised to include additional specificity in terms of rodenticide use, noting that its use is restricted in areas that may support special status wildlife.

The WEAP training (refer to Mitigation Measure BIO-1) provided to on-site construction personnel will discuss protocols to be followed when road kill is encountered. This will involve notification to the appropriate agency and on-site qualified biologist(s); other than the notification, VSSP construction personnel will not be directly involved with instances of road kill. The qualified biologist(s) will be responsible for determining the species of animal injured or killed. As stated in Mitigation Measure BIO-2, during the site disturbance and/or construction phase, grading and construction activities before dawn and after dusk, is prohibited. The commenter notes a reference to night lighting under Impact BIO-11. This text has been revised to provide additional specificity by indicating that potential indirect impacts could occur from artificial lighting during periods immediately following dawn and prior to dusk.

Mitigation Measure BIO-2 requires avoidance and minimization of vegetation removal within active construction areas, including the flagging of sensitive vegetation communities or plants. As is common place on most construction projects that have the potential to impact sensitive biological resources, a specific color of flagging and/or paint is chosen at the start of the project to represent sensitive resources. One of the items under this same mitigation measure requires that all excavation, steep-walled holes, or trenches in excess of six inches in depth be covered at the close of each working day with plywood or similar materials, or provided with one or more escape ramps constructed of earth dirt fill or wooden planks. Trenches will also be inspected for entrapped wildlife each morning prior to onset of construction activities, and immediately prior to covering with plywood at the end of each working day. Before such holes or trenches are filled, they will be thoroughly inspected for entrapped wildlife. Any wildlife discovered will be allowed to escape before construction activities are allowed to resume, or removed from the trench or hole by a qualified biologist holding the appropriate permits (if required). As noted above, on-site construction personnel will not be responsible for identifying wildlife species, but will be able to make an observation and contact the qualified biologist to determine the species and best course of action.

B1-38 As stated in the first sentence under Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*), to compensate for impacts to sensitive vegetation communities from the construction of the VSSP, SCE shall restore all temporary impact areas; restoration shall be completed as described in the Habitat Restoration and Monitoring Plan outlined under Mitigation Measure BIO-4 (*Develop a Habitat Restoration and Monitoring Plan*).

Mitigation Measure BIO-3 also states that the creation or restoration of habitat shall be required for all permanent impacts to sensitive vegetation communities. The replacement ratios for permanent impacts to riparian vegetation are 3:1; a ratio of 1:1 shall be applied to all other sensitive communities (including non-native annual grassland). All created or restored habitats shall be monitored per the requirements in the Habitat Restoration and Monitoring Plan (see Mitigation Measure BIO-4). If SCE becomes a PSE with the MSHCP, compensation for impacts to sensitive vegetation communities may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation (i.e., Certificate of Inclusion) and compliance with the MSHCP, including mitigation fee payment confirmation, shall

be submitted to the CPUC prior to site mobilization activities. Impacts to sensitive communities not covered under the MSHCP would be subject to the compensation requirements discussed above. In response to compensation for impacts to non-native annual grassland, please refer to response to Comment B1-35, above.

B1-39 If SCE becomes a PSE with the MSHCP, compensation for impacts to sensitive vegetation communities may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation (i.e., Certificate of Inclusion) and compliance with the MSHCP, including mitigation fee payment confirmation, shall be submitted to the CPUC prior to site mobilization activities. Impacts to sensitive communities not covered under the MSHCP would be subject to the compensation requirements discussed in Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*).

In response to the link provided by the commenter, this provides a list of entities that are authorized to hold and manage mitigation lands whose interest in real property has been transferred to CDFW. If SCE elects to transfer interest in real property to CDFW, then one of the entities on this list may be chosen to manage the lands. If they do not elect to transfer interest to CDFW, SCE must comply with the requirements outlined in Mitigation Measure BIO-3. The terms of the conservation easement and amount of the required non-wasting endowment will be determined once the project design is finalized and the environmental document is complete. CEQA does not require that the conservation easement terms be completed prior to this point.

B1-40 Refer to response to Comment B1-6, above.

B1-41 Mitigation Measure BIO-2 (*Implement Best Management Practices*) requires the avoidance and minimization of vegetation removal within active construction areas, including the flagging of sensitive vegetation communities or plants. During the pre-construction surveys the qualified biologist(s) will flag sensitive areas for avoidance. Mitigation Measure BIO-5 (*Implement Biological Construction Monitoring*) requires that any special-status terrestrial species found within a VSSP impact area shall be relocated by the authorized biologist to suitable habitat outside the impact area (permits and/or MOU's may be required for some species). Clearance surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day during initial ground disturbance, and weekly thereafter. If nesting birds are found during the pre-construction surveys, appropriate buffers shall be installed (as prescribed in Mitigation Measure BIO-6 [*Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures*]).

B1-42 As stated under Impact BIO-2, over half (approximately 138.42 acres) of the habitat/land cover types within the VSSP impact areas are mapped as disturbed/ruderal or urban/developed. For many common species including rabbits, ground squirrels, and some birds, the VSSP would not lead to a substantial loss of foraging habitat. New structures constructed as part of the VSSP may actually provide additional perches, refugia, and increased access to some prey, for species such as Cooper's hawks and kestrels. While additional perching locations may be provided by the VSSP, construction of the VSSP would not result in an increase in the population of raptors within the Project area; small mammals would remain subject to predatory birds such as they were prior to construction of the VSSP.

As stated under Mitigation Measure BIO-4 (*Develop a Habitat Restoration and Monitoring Plan*), the intent of this mitigation measure is to require SCE to restore temporarily disturbed areas to

pre-construction conditions or better and provide for habitat creation/restoration resulting from permanent impacts to sensitive vegetation communities (refer to Mitigation Measure BIO-3).

In regards to the Avian Power Line Interaction Committee's standards, Mitigation Measure BIO-2, requires compliance with this standard. See last bullet of the measure. Compliance with this requirement specifically reduces the potential for possible electrocution of avian species.

Due to the temporary nature of the impacts and the availability of foraging habitat in adjacent areas the loss of foraging habitat for wildlife resulting from the construction of the VSSP would not be significant.

B1-43 As stated under Impact BIO-3, when possible, construction and maintenance activities would occur outside of the recognized breeding season (generally February – September [as early as January for some raptors]). It may be possible to postpone construction in specific areas that provide substantial amounts of suitable nesting habitat. If construction cannot be postponed beyond the nesting season, Mitigation Measure BIO-6 (*Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures*) requires that prior to construction activities (i.e., mobilization, staging, grading, or construction) SCE shall retain a qualified avian biologist, approved by the CPUC, to conduct pre-construction surveys for nesting birds within the recognized breeding season in all areas within 500 feet of all VSSP components (i.e., staging areas, tower/pole sites, and access road locations). Surveys for raptors shall be conducted for all areas from January 1 to August 15. If breeding birds with active nests are found prior to or during construction, the qualified avian biologist shall establish a minimum 300-foot buffer (500 foot for raptors) around the nest, and no activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. The prescribed buffers may be adjusted by the qualified avian biologist based on existing conditions around the nest, planned construction activities, tolerance of the species, and other pertinent factors. Buffer reductions for listed or special-status species may require coordination with the USFWS and/or CDFW.

Mitigation Measure BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*) requires that SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with the CPUC, CDFW, and USFWS. The NBMP shall describe methods to minimize potential Project effects to nesting birds, and avoid any potential for unauthorized take. Project-related disturbance including construction and pre-construction activities shall not proceed until approval of the NBMP by CPUC, in consultation with CDFW and USFWS. The NBMP shall be implemented over the entire VSSP site regardless of SCE's PSE status with the MSHCP.

B1-44 Mitigation Measure NOI-2 (*Implement Best Management Practices for Construction Noise*) limits vehicle idling times, restricts the use of noise-producing signals, including horns, whistles, alarms, and bells, to safety warning purposes only, and requires electric-powered equipment be used instead of pneumatic or internal combustion power equipment, where feasible; all of these measures will work to reduce the overall noise impact from the VSSP.

Mitigation Measure BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*) requires the preparation and implementation of a NBMP. One requirement of this plan (as outlined in the measure) is a noise monitoring requirement. As discussed under the measure, if an active breeding territory or nest is confirmed within 500 feet of any Project activity site, SCE shall prepare and implement noise monitoring throughout construction and/or VSSP related activities taking place while listed birds occupy the nesting territory. Sound levels at the nest sites shall

not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the qualified biological monitor or qualified avian biologist determines that construction activities are disturbing nesting birds, additional noise reduction techniques shall be implemented to reduce Project noise below the thresholds. Noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques noted in Mitigation Measure BIO-7 can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue construction vehicles to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site
- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

B1-45 Mitigation Measure BIO-6 (*Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures*) has been revised to include additional specificity as to the recipients of the required annual reports. In response to comments on the need for a biological opinion or the requirement for Section 10 consultation, please refer to response to Comment B1-2, above.

B1-46 As stated under Mitigation Measure BIO-6 (*Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures*) prescribed buffers may be adjusted by the qualified avian biologist based on existing conditions around the nest, planned construction activities, tolerance of the species, and other pertinent factors. Buffer reductions for listed or special-status species may require coordination with the USFWS and/or CDFW.

Mitigation Measure BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*) states that SCE shall prepare and implement noise monitoring throughout construction and/or VSSP related activities taking place while listed birds occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring. This measure also states that if the hourly average noise threshold is exceeded, or if the qualified biological monitor or qualified avian biologist determines that construction activities are disturbing nesting birds, additional noise reduction techniques shall be implemented to reduce Project noise below the thresholds. Refer to response to Comment B1-44 for a list of potential noise reduction techniques.

B1-47 As discussed under Impact BIO-4, while there would be no direct impacts to adjacent habitat, indirect impacts from the VSSP would include fugitive dust, increased noise levels due to heavy equipment and vehicle traffic, light impacts from construction during low-light periods, alterations to existing topographical and hydrological conditions, increased erosion and sediment transport, and the establishment of noxious weeds. Noise from vegetation clearing, excavation/grading, and

construction activities could affect wildlife in adjacent habitats by interfering with breeding or foraging activities and movement patterns, causing animals to temporarily avoid areas adjacent to the construction zone. The text of Impact BIO-4 has been revised to clarify the types of species for which impacts would be mitigated to less-than-significant levels with the implementation of the proposed mitigation.

As stated in Mitigation Measure BIO-2 (*Implement Best Management Practices*), during the site disturbance and/or construction phase, grading and construction activities before dawn and after dusk, is prohibited. A reference to night lighting under Impact BIO-11 has been revised to provide additional specificity by indicating that potential indirect impacts could occur from artificial lighting during periods immediately following dawn and prior to dusk.

B1-48 Please refer to response to Comment B1-43.

B1-49 CEQA does not require that applicants consult with or obtain take permits from CDFW or the USFWS prior to the circulation of a draft environmental document. This process takes place once the final Project design has been determined and the CEQA document has been approved. As stated under Mitigation Measure BIO-8 (*Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow Flycatcher; Avoid Occupied Habitat*), take of Least Bell's Vireo (LBV), Southwestern Willow Flycatcher (SWFL), and Willow Flycatcher (WFL) habitat and incidental take of individual LBV, SWFL, and/or WFL may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP.

In regards to temporary impacts, as stated in the first sentence under Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*), to compensate for impacts to sensitive vegetation communities from the construction of the VSSP, SCE shall restore all temporary impact areas; restoration shall be completed as described in the Habitat Restoration and Monitoring Plan outlined under Mitigation Measure BIO-4.

As stated under Impact BIO-5, VSSP activities have the potential to impact LBV, WFL, and SWFL through direct impacts, similar to those described for Impact BIO-3 (The project would result in disturbance to nesting birds or raptors), including vegetation removal, construction of new access/spur roads, increased noise levels (i.e., removal and/or construction of light-weight steel [LWS] poles and tubular steel poles [TSPs]), and periodic human presence. During the breeding season construction activities could result in the displacement of breeding birds and the abandonment of active nests. Indirect impacts could include the loss of habitat as a result of the spread of noxious weeds, increased noise levels from heavy equipment, exposure to fugitive dust, human presence during repairs to structures or routine inspection of the subtransmission line. Weed management could also affect nesting. However, implementation of the proposed mitigation measures would significantly minimize impacts to LBV, WFL, and SWFL.

B1-50 Mitigation Measure BIO-8 (*Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow Flycatcher; Avoid Occupied Habitat*) requires that if VSSP-related activities are scheduled to occur during the breeding season (February through September), SCE shall have a qualified and permitted avian biologist, approved by the CPUC, conduct protocol surveys in suitable habitat within 500 feet of disturbance areas. In known occupied habitat for listed riparian birds, SCE shall conduct focused protocol surveys of the VSSP and adjacent areas within 500 feet. The surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season.

As stated under Mitigation Measure BIO-8, protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities. This requirement is based on the limited survey window for the referenced species. Surveys for LBV must be conducted between 10 April and July 31 and include at least eight survey events at least ten days apart. Project-related surveys for SWFL require at least three surveys from 22 June to 17 July. In addition, Mitigation Measure BIO-5 (*Implement Biological Construction Monitoring*) requires that clearance surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day during initial ground disturbance, and weekly thereafter.

B1-51 All potential impact areas resulting from construction of the VSSP are contained within the proposed impact corridor as shown on EIR Figures C.5-1a through C.5-1d. (See response to Comment B1-29 for information on the four staging yards not shown on these figures.) Impacts to biological resources, including permanent and temporary impacts to vegetation communities, were analyzed for the entire impact corridor. Acreages for vegetation communities and land cover types occurring within the impact corridor are presented in Table C.5-9 (Section C.5) of the EIR.

As stated in the first sentence under Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*), to compensate for impacts to sensitive vegetation communities from the construction of the VSSP, SCE shall restore all temporary impact areas; restoration shall be completed as described in the Habitat Restoration and Monitoring Plan outlined under Mitigation Measure BIO-4 (*Develop a Habitat Restoration and Monitoring Plan*). As required under Mitigation Measure BIO-9 (*Conduct Protocol Surveys for Coastal California Gnatcatcher (CAGN) and Avoid Occupied Habitat*), SCE shall have a qualified and permitted avian biologist, approved by the CPUC, conduct protocol surveys for CAGN in all areas of coastal sage scrub habitat that may be affected by the Project. Survey areas will include a 500-foot buffer around Project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories; survey areas shall include a 500-foot buffer around VSSP disturbance areas.

Protocol breeding season surveys for CAGN require a minimum of six surveys, conducted at least one week apart, from 15 March through 30 June. Protocol non-breeding season surveys require nine surveys, at least two weeks apart, from 1 July through 14 March. If an active breeding territory or nest is confirmed, the CPUC, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC for review on a weekly basis. In coordination with the USFWS and CDFW, a minimum 300-foot disturbance-free ground buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers.

B1-52 All potential impact areas resulting from construction of the VSSP are contained within the proposed impact corridor as shown on EIR Figures C.5-1a through C.5-1d (also see response to Comment B1-29). Impacts to biological resources, including permanent and temporary impacts to vegetation communities, were analyzed for the entire impact corridor. Acreages for vegetation communities and land cover types occurring within the impact corridor are presented in Table C.5-9 (Section C.5) of the EIR.

If SCE becomes a PSE in the MSHCP additional measures to mitigate the Project's impacts to Quino checkerspot, above and beyond those described under Impact BIO-7, may be required and would be determined once SCEs PSE status is determined.

B1-53 All potential impact areas resulting from construction of the VSSP are contained within the proposed impact corridor as shown on EIR Figures C.5-1a through C.5-1d (also see response to Comment B1-29). Impacts to biological resources, including permanent and temporary impacts to vegetation communities, were analyzed for the entire impact corridor. Acreages for vegetation communities and land cover types occurring within the impact corridor are presented in Table C.5-9 (Section C.5) of the EIR.

As stated in EIR Section B.7 (Applicant Proposed Measures), SCE intends to apply to participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). If SCE is approved as a Participating Special Entity (PSE) then consultation with the USFWS may be not be required. Should SCE not be approved as a PSE, then the USACE would be a conduit for consultation with the USFWS under Section 7 of the federal Endangered Species Act (provided that the Project would impact federally jurisdictional wetlands/waters). CEQA does not require that Section 7 consultation be initiated prior to the completion of an environmental document. This process is typically initiated once the environmental document is approved and alternative has been chosen. If the Project would not impact any wetlands/waters that fall under the jurisdiction of the USACE, and there is no other federal nexus, then SCE would be required to consult with the USFWS under Section 10 of the federal Endangered Species Act.

As stated in Mitigation Measure BIO-10 (*Protocol Surveys for Quino Checkerspot and Avoidance of Suitable/Occupied Habitat*), SCE will conduct protocol surveys, following current USFWS guidelines, for the Quino checkerspot; any deviations from the most up to date guidelines must be approved by the USFWS. Surveys will be conducted by a qualified and permitted biologist approved by the CPUC. Protocols require an initial site habitat assessment, prior to the first survey, to determine the location of areas with suitable habitat. Subsequent surveys are not to be conducted concurrently with any other survey effort. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for Quino checkerspot to the CPUC for review and approval in consultation with the USFWS.

B1-54 Please refer to response to Comment B1-6 for information regarding restoration for temporary impacts. As described under Impact BIO-7, implementation of the listed mitigation measures would minimize impacts to Quino checkerspot, to the extent possible, and reduce impacts to a less-than-significant level. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development and implementation of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities.

B1-55 As stated in Table C.5-5 of the EIR, there are multiple CNDDB records for Riverside fairy shrimp within or immediately adjacent to the Survey Area; potentially suitable habitat occurs in the Survey Area. Table C.5-5 also notes an occurrence of vernal pool fairy shrimp approximately 0.4 miles south of the Survey Area. Wet and dry season surveys for fairy shrimp were conducted within potentially suitable habitat at the VSSP site from 2012-2014; vernal pool and Riverside fairy shrimp were not detected.

Mitigation Measure BIO-12 (*Complete Protocol-level Surveys for Vernal Pool and Riverside Fairy Shrimp*) requires SCE to conduct protocol surveys for the federally threatened vernal pool fairy shrimp and the federally endangered Riverside fairy shrimp each year of construction, in areas subject to Project disturbance, that have not been surveyed within the last three years. Surveys can only be suspended upon written authorization from the USFWS/CDFG and the CPUC. This measure also requires SCE to retain a CPUC approved biologist holding the required 10(a)(1)(A) recovery permit from the USFWS to conduct surveys within all potential fairy shrimp habitat found within the Project footprint including, but not limited to, seasonal/ephemeral wetlands, swales, large road ruts and known vernal pool habitat. Surveys must follow the guidelines set forth by the USFWS in the Interim Survey Guidelines to Permittees for Recovery Permits under Section 10(a)(1)(A) of the Endangered Species Act for Listed Vernal Pool Branchiopods. Further this measure requires, within 90 days of the completion of surveys, SCE to submit a report to the CPUC detailing the results of each survey event.

Surveys to date have not resulted in the detection of listed vernal pool branchiopods. The surveys discussed above will serve to continue this survey effort during VSSP construction. Mitigation Measure BIO-13 (*Avoid Seasonal Depressions and Known Waterbodies*) requires that SCE avoid all known seasonal/ephemeral depressions, vernal pools and known water bodies (refer to EIR Figures C.5-2a to C.5-2g) that have been verified or have the potential to be occupied by listed fairy shrimp and to identify them on all applicable construction plans to minimize impacts to listed fairy shrimp. This measure also requires a 100-foot buffer around all seasonal/ephemeral depressions, vernal pools and known waterbodies that have the potential to, but do not presently support listed fairy shrimp, to prevent equipment from entering these areas.

B1-56 As stated under Mitigation Measure BIO-13 (*Avoid Seasonal Depressions and Known Waterbodies*), if avoidance of known populations of listed fairy shrimp is not possible, consultation with the USFWS regarding the potential impacts to the species will be necessary. Mitigation Measure BIO-14 (*Compensate for Impacts to Vernal Pool or Riverside Fairy Shrimp Habitat*) requires compensation for impacts to vernal pool or Riverside fairy shrimp. To compensate for impacts, the USFWS will require both a preservation and creation component. Refer to Mitigation Measure BIO-14 for additional information on compensation requirements (taken from USFWS guidelines). Take of suitable or occupied habitat may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP. Documentation of participation (i.e., Certificate of Inclusion) and compliance with the MSHCP, including mitigation fee payment confirmation, shall be provided to the CPUC prior site mobilization activities.

B1-57 Mitigation Measure BIO-14 (*Compensate for Impacts to Vernal Pool or Riverside Fairy Shrimp Habitat*) requires compensation for impacts to vernal pool or Riverside fairy shrimp. Consistent with USFWS guidelines, Mitigation Measure BIO-14 requires both a preservation and creation component to compensate for and reduce impacts to listed fairy shrimp. Refer to Mitigation Measure BIO-14 for specific details of the compensation requirements.

B1-58 A suite of mitigation measures, listed under Impact BIO-9 in the EIR, when implemented would minimize impacts to Stephens' kangaroo rat (SKR) to the extent possible and reduce impacts to a less-than-significant level. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys,

development and implementation of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities.

The commenter notes a reference to night lighting under Impact BIO-11 (The Project could result in injury or mortality of western spadefoot toad). The text under this impact has been revised to provide additional specificity by indicating that potential indirect impacts could occur from artificial lighting during periods immediately following dawn and prior to dusk.

If SCE becomes a PSE in the MSHCP and/or a participating member of the Riverside County Habitat Conservation Agency (RCHCA) Habitat Conservation Plan (HCP) for SKR, additional measures to mitigate the Project's impacts to SKR, above and beyond those proposed, may be required; additional measures, if required, would be determined after SCE's participation in either of the aforementioned plans is approved.

B1-59 As described under Mitigation Measure BIO-15 (*Complete Focused Pre-construction Stephens' Kangaroo Rat (SKR) Burrow/Precinct Surveys and Implement Avoidance Measures*), no more than 30 days prior to commencement of ground disturbing activities, SCE shall retain a qualified and permitted biologist, approved by the CPUC, to conduct pre-construction surveys for SKR. If active SKR burrows/precincts are present, they shall be flagged, with ground-disturbing activities to be setback a minimum of 100 feet from each active burrow/precinct. The setback shall be delineated in the field in such a method that it is easily visible by all construction personnel and no work will be allowed within the setback areas (for the duration of the VSSP) until authorized by the USFWS, CDFW, and the CPUC. The biological monitor shall periodically field check the mapped burrows/precincts to buffer delineation and that flagging are all in good working order. All active burrows/precincts shall be mapped and incorporated into a GIS-based figure for use by the on-site monitors and construction crews. Figures shall include each mapped burrow/precinct and buffer utilizing a highly visible method easily identifiable by construction workers and monitors in the field.

Avoidance of burrows/precincts is mandatory. If SCE determines that construction activities will require work within the setback areas noted above, documentation of a take permit and biological opinion from the CDFW and USFWS, respectively, must be provided. Take of individual SKR may be covered by the MSHCP, if SCE becomes a PSE and implements the requirements of the MSHCP, and/or is an approved participant in the RCHCA HCP for SKR. Documentation of participation with either the MSHCP or SKR HCP shall be provided to the CPUC prior to any take of this species.

It is possible that during the course of construction the biological monitor(s) and/or qualified biologist(s) may observe new burrows not previously assessed. The burrows would need to be assessed for the presence of special status species and the appropriate buffers installed or take authorizations obtained.

B1-60 Mitigation Measure BIO-16 (*Compensate for Permanent Impacts to Stephens' Kangaroo Rat*) requires compensation for permanent impacts to SKR. Text has been added to this measure to provide additional specificity as to the requirements of compensations lands. As described under Mitigation Measure BIO-15 (*Complete Focused Pre-construction Stephens' Kangaroo Rat (SKR) Burrow/Precinct Surveys and Implement Avoidance Measures*), if SCE determines that construction activities will require work within the setback areas noted above they must provide documentation of a take permit and biological opinion from the CDFW and USFWS, respectively.

These documents will provide details as to activities authorized under each permit and may require the implementation of such measures as relocation of individual SKR.

Consistent with other projects in the area and as described under Mitigation Measure BIO-16, a conservation easement would need to be recorded on all property associated with the mitigation lands as to protect the existing biological resources in perpetuity. A conservation easement could be held by CDFW or an approved land management entity and shall be recorded immediately upon the dedication or acquisition of the land. Preserved or acquired mitigation lands will be monitored and maintained per the requirements set forth in the Habitat Mitigation and Monitoring Plan prepared for the Project and discussed in Mitigation Measure BIO-17 (*Preparation of a Habitat Mitigation and Monitoring Plan*). The location of all lands proposed for mitigation land must be submitted to the CPUC, for review and approval, prior to start of construction mobilization activities.

Mitigation Measure BIO-17 requires that SCE prepare a Habitat Mitigation and Monitoring Plan (HMMP). The intent of this plan, as described under the measure, is to ensure the success of on-site preserved land and acquired mitigation lands, required for compensation of permanent impacts to vegetative communities and listed or special-status plants and wildlife. The minimum requirements of the plan are outlined in subsections a – g in the text of the mitigation measure. Subsection "g" refers specifically to lands preserved within the VSSP site; subsection "c" requires a discussion of measures to be undertaken to enhance (e.g., through focused management) the on-site preserved habitat and off-site mitigation lands for listed and special-status species.

B1-61 As described under Mitigation Measure BIO-17 (*Preparation of a Habitat Mitigation and Monitoring Plan*), to ensure the success of on-site preserved land and acquired mitigation lands, required for compensation of permanent impacts to vegetative communities and listed or special-status plants and wildlife, SCE shall retain a CPUC approved/qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP). While the plan is presented under the impact statement for SKR, the plan serves to address all preserved and acquired lands. Mitigation measures under impact statements addressing different species provide specific requirements and details for land acquisition and preservation requirements.

For consistency purposes the three-year monitoring requirement for SCE has been changed to five years to match the other monitoring term requirements in Mitigation Measure BIO-17. The measure requires that SCE include a contingency plan for all mitigation elements so that in the event that the final performance/success criteria are not met within the initial five-year period. Mitigation measures have been developed to minimize impacts to SKR. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development and implementation of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of mitigation measures listed under Impact BIO-9 would minimize impacts to SKR to the extent possible and reduce impacts to a less-than-significant level.

B1-62 As stated under Mitigation Measure BIO-18 (*Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, Candidate, or other Special-Status Plants and Implementation of Avoidance Measures*), prior to initial ground disturbance and for undisturbed areas in subsequent construction years, SCE shall conduct pre-construction surveys for State and federally listed Threatened and Endangered, Proposed, Petitioned, Candidate, and

other special-status plants in all areas subject to ground-disturbing activity, including, but not limited to, tower/pole locations, construction areas, assembly yards, and areas subject to grading for new access roads. The surveys shall be conducted during the appropriate blooming period(s) by a qualified plant ecologist/biologist, approved by the CPUC, according to protocols established by the USFWS, CDFW, and California Native Plant Society (CNPS). All listed plant species found shall be marked and avoided.

These surveys must be accomplished during a year in which rainfall totals are at least 80% of average and in which the temporal distribution of rainfall is not highly abnormal (e.g., with the vast majority of rainfall occurring very early or late in the season) to be reasonably certain of the presence/absence of rare plant species, unless surveys of reference populations document that precipitation conditions would not have adversely affected the ability to detect the species. Taking into consideration the lack of rain in the recent years, conducting the surveys during a year in which rainfall is at least 80% of average may prove difficult. Additional language has been added to Mitigation Measure BIO-18 to allow for this requirement to be waived by the CPUC after consultation with the CDFW and USFWS.

All populations of listed plant species identified during the surveys within the VSSP limits and beyond, shall be protected and a buffer zone placed around each population. The buffer zone shall be established around these areas and shall be of sufficient size to eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. The size of the buffer depends upon the proposed use of the immediately adjacent lands, and includes consideration of the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, physical and chemical characteristics of soils) that are identified by the qualified plant ecologist and/or botanist. The buffer for herbaceous and shrub species shall be, at minimum, 50 feet from the perimeter of the population or the individual. Although 50 feet is the minimum buffer requirement, many species will require and be afforded larger buffers.

Where impacts to listed plants are determined to be unavoidable, the USFWS and/or CDFW shall be consulted for authorization. Additional mitigation measures to protect or restore listed plant species or their habitat, including but not limited to a salvage plan including seed collection and replanting, may be required by the USFWS or CDFW before impacts are authorized, whichever is appropriate.

To compensate for permanent impacts to State and federally Threatened, Endangered, Proposed, Petitioned and Candidate plants, habitat that is not already public land shall be preserved and managed in perpetuity at a 1:1 mitigation ratio (One acre preserved for each acre impacted). Compensation for impacts to other special-status plants is discussed under Impact BIO-14 in the Final EIR. Prior to the disturbance of habitat for or take of listed plant species, SCE will be required to obtain CPUC approval of preserved and/or mitigation lands as well as provide documentation of a recorded conservation easement(s). Compensation for temporary impacts shall include land acquisition and/or preservation at a 0.5:1 ratio. The preserved habitat for a significantly impacted plant species shall be of equal or greater habitat quality to the impacted areas in terms of soil features, extent of disturbance, vegetation structure, and will contain verified extant populations, of the same size or greater, of the State or federally listed plants that are impacted. A conservation easement would need to be recorded on all property associated with the mitigation lands as to protect the existing plant resources in perpetuity. A conservation easement could be held by CDFW or an approved land management entity and

shall be recorded immediately upon the dedication or acquisition of the land. Preserved or acquired mitigation lands will be monitored and maintained per the requirements set forth in the Habitat Mitigation and Monitoring Plan prepared for the Project (Mitigation Measure BIO-17).

Mitigation measures have been developed to minimize and avoid impacts to listed plants. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development and implementation of a Habitat Mitigation and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would minimize impacts to listed plant species to the extent possible and reduce impacts to a less-than-significant level.

B1-63 Impacts to San Diego ambrosia critical habitat were not omitted from the EIR as they are not expected to occur. The critical habitat occurs at the southern extent of the VSSP. This area of the Project is slated for reconductoring of the existing double–circuit 115-kV subtransmission line. No new roads are proposed within the critical habitat area as existing maintenance roads are already in place. All pull and tension sites, splicing sites, and guard structures would be located outside of the critical habitat based on the proposed locations depicted on EIR Figure B-8. EIR Section B.4.6.1 states that on relatively straight alignments (flat terrain), typical wire pulls occur approximately every 6,000 feet. The critical habitat area occurs along an approximately 2,000-foot long section of the Project; therefore, the wire pulls would span the critical habitat area. The VSSP does not propose to destroy or adversely affect any mapped critical habitat for San Diego ambrosia.

B1-64 Criterion BIO3, which does come from the CEQA guidelines (Appendix G), pertains to special status species such as CDFW species of special concern and USFWS Bird Species of Conservation Concern. Criterion BIO2, also from the CEQA guidelines, is specific to species listed as endangered, threatened, or proposed. As a CDFW species of special concern, the western spadefoot toad is discussed under the correct criterion (Criterion BIO3).

As stated under Impact BIO-11, indirect impacts on this species, if present, may be caused by soil compaction, altered hydrologic conditions, artificial lighting during periods immediately following dawn and prior to dusk, or the establishment of noxious weeds. Nighttime work is not proposed as part of the VSSP.

B1-65 As required by Mitigation Measure BIO-20 (*Complete Focused Pre-construction Western Spadefoot Toad Surveys and Implement Avoidance Measures*), prior the site mobilization, SCE shall retain a CPUC approved/qualified biologist to conduct a pre-construction survey during the appropriate time of year when western spadefoot toad can be detected (i.e., during periods of suitable rainfall that result in pooling or the formation of other aquatic habitat) to determine the presence of western spadefoot toad and related habitat. Therefore, all areas of suitable habitat subject to disturbance by the VSSP during the appropriate survey window would need to be surveyed. If suitable habitat is to be disturbed in August, those areas would be surveyed during the prior rainy season. These surveys cannot occur within one week of all ground disturbing activities due to the nature of the appropriate survey window.

Should the toad and habitat be found, and be impacted by temporary and/or permanent Project impacts, a habitat restoration and management plan shall be prepared for review and approval by the CPUC, that addresses the following:

1. Impacted occupied breeding habitat to be replaced, on-site, at a 2:1 ratio.
2. Relocation areas shall be designed as suitable toad habitat, and as far away as feasible from any Project-related structure or foreseeable construction area (minimum 250-foot buffer from construction activities).
3. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing ponds as feasible.
4. No site preparation or construction activities shall be permitted in the vicinity of any occupied ponds until the design and construction of the relocation habitat in preserved areas of the site has been completed and all western spadefoot toad adults, tadpoles, and egg masses detected are moved to the created pool habitat. If egg masses or tadpoles are relocated the newly constructed ponds shall also be inoculated with algae laden plant material/and or water from the source ponds to provide a viable food source.
5. Restoration areas shall be monitored and maintained until they are shown as successful habitat for the toad, or up to five years. Success criteria shall be proposed. Provisions to make adjustments to remediate problems shall also be included.
6. Permanent protection and management of restoration areas (e.g., conservation easement or fee title purchase, etc.).

The language of Mitigation Measure BIO-20 has been revised in include additional specificity as to the requirements for constructed mitigation ponds. Daily pre-construction surveys would occur in all areas of the VSSP during ground disturbing activities and would include all plants and wildlife, such as western spadefoot toad.

B1-66 As stated under Impact BIO-12, if SCE becomes a PSE in the MSHCP additional measures to mitigate the Project's impacts to two-striped garter snake, above and beyond those described below, may be required. These measures would be determined after SCE's participation in the MSHCP is approved.

Mitigation Measure BIO-5 (*Implement Biological Construction Monitoring*) requires that no more than 30 days prior to the commencement of ground disturbance or site mobilization activities, SCE shall retain a qualified biologist(s), approved by the CPUC, to monitor VSSP construction. The biologist will have demonstrated expertise with special-status plants, terrestrial mammals, reptiles, and birds. Monitoring will occur during initial ground disturbance for each phase of construction. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities. The qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special-status species. Additionally, the following measures would also be implemented:

- Mitigation Measure BIO-6 (*Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures*) requires pre-construction surveys for nesting birds;
- Mitigation Measure BIO-15 (*Complete Focused Pre-construction Stephens' Kangaroo Rat (SKR) Burrow/Precinct Surveys and Implement Avoidance Measures*) requires pre-construction surveys for SKR;

- Mitigation Measure BIO-18 (*Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, Candidate, or other Special-Status Plants and Implementation of Avoidance Measures*) requires pre-construction surveys for listed plants;
- Mitigation Measure BIO-22 (*Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures*) requires pre-construction surveys for terrestrial herpetofauna; and
- BIO-25 (*Complete Focused Pre-construction Burrowing Owl Surveys and Implement Avoidance Measures*) requires pre-construction surveys for burrowing owl.

All of the surveys noted above, while focused on a particular species, will also note all other instances of sensitive plants and wildlife observed and provide for a large amount of overlap in the areas surveyed.

B1-67 As stated under Mitigation Measure BIO-22 (*Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures*), prior to ground disturbance or vegetation clearing within the VSSP site, SCE shall retain a CPUC approved/qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access, or maintenance. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present during all activities immediately adjacent to or within habitat that supports terrestrial herpetofauna. Clearance surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of construction each day in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the VSSP will be relocated to the nearest suitable habitat that will not be affected by the VSSP.

As stated under Impact BIO-13, indirect impacts to terrestrial herpetohauna could include compaction of soils, fugitive dust, increased noise levels, and the introduction of exotic plant species. A suite of mitigation measures has been developed to minimize impacts to terrestrial herpetofauna to the extent possible and would reduce impacts to a less-than-significant level. Aside from biological monitoring, the measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development and implementation of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and avoiding known depressions and water bodies.

B1-68 As stated under Mitigation Measure BIO-6 (*Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures*), prior to construction activities (i.e., mobilization, staging, grading, or construction) SCE shall retain a qualified avian biologist, approved by the CPUC, to conduct pre-construction surveys for nesting birds within the recognized breeding season in all areas within 500 feet of all VSSP components (i.e., staging areas, tower/pole sites, and access road locations). Surveys for raptors shall be conducted for all areas from January 1 to August 15. The required survey dates may be modified based on local conditions, as determined by the qualified avian biologist, with the approval of the CDFW and/or USFWS (where applicable).

In addition, Mitigation Measure BIO-8 (*Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow Flycatcher; Avoid Occupied Habitat*) requires that if

VSSP-related activities are scheduled to occur during the breeding season (February through September), SCE shall have a qualified and permitted avian biologist, approved by the CPUC, conduct protocol surveys in suitable habitat within 500 feet of disturbance areas. In known occupied habitat for listed riparian birds, SCE shall conduct focused protocol surveys of the VSSP and adjacent areas within 500 feet. All species of birds noted during the surveys would be recorded, including special-status species such as Cooper's hawk.

Mitigation Measure BIO-9 (*Conduct Protocol Surveys for Coastal California Gnatcatcher (CAGN) and Avoid Occupied Habitat*) requires that SCE shall have a qualified and permitted avian biologist, approved by the CPUC, conduct protocol surveys for CAGN in all areas of coastal sage scrub habitat that may be affected by the Project. Survey areas will include a 500-foot buffer around Project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories; survey areas shall include a 500-foot buffer around VSSP disturbance areas. All species of birds noted during the surveys would be recorded, including special-status species such as yellow warbler.

To minimize impacts to bird species a suite of mitigation measures has been developed and are listed under Impact BIO-14. Implementation of these mitigation measures would minimize impacts to bird species listed as California Species of Special Concern, CDFW Special Animals, California Fully Protected species, and MSHCP covered species to the extent possible and reduce impacts to a less-than-significant level.

B1-69 As stated in Mitigation Measure BIO-23 (*Survey for Maternity Colonies or Hibernaculum for Roosting Bats*), prior to ground disturbance or vegetation clearing at all VSSP locations, SCE shall retain a qualified biologist, approved by the CPUC, to conduct surveys for sensitive bats. Surveys shall be conducted no more than 15 days prior to grading near or the removal of trees or other structures. Surveys shall also be conducted during the maternity season (1 March to 31 July) within 300 feet of VSSP activities. If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not removed), if feasible. If avoidance of the maternity roost is not feasible the qualified biologist will implement the following actions.

- **Maternity roosts.** If a maternity roost will be impacted by the VSSP, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be provided on, or in close proximity to, the VSSP site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bats requirements in coordination with CDFW. By making the roosting habitat available prior to eviction, the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall be notified of any hibernacula or active nurseries within the construction zone.
- **Exclusion of bats prior to eviction from roosts.** If non-breeding bat hibernacula are found in trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern California. This action should allow all bats to leave during the course of one week. Roosts

that need to be removed in situations where the use of one-way doors is not necessary in the judgment of the qualified biologist shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal).

The creation/installation of substitute roosting habitat for maternity colonies is routinely done when maternity roosts are impacted by a project. As stated above, these alternative roost sites would be constructed in accordance with each specific bats requirements and in coordination with the CDFW. A suite of mitigation measures has been developed and are presented under Impact BIO-15 in the EIR. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development and implementation of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. In addition, Mitigation Measure NOI-2 (*Implement Best Management Practices for Construction Noise*) would require the use of noise-suppression techniques, to the extent feasible, during construction and Mitigation Measure BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*) includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to special-status bats to the extent possible and reduce impacts to a less-than-significant level.

B1-70 As stated under Impact BIO-16, direct impacts to small mammals designated as California Species of Special Concern or MSHCP covered species would include mechanical crushing by vehicles and construction equipment, trampling, and loss of habitat. Construction disturbance can also result in the flushing of small animals from refugia, which increases the predation risk for small rodents. Indirect impacts include exposure to fugitive dust, alteration of soils, such as compaction, that could preclude burrowing and the spread of exotic weeds, and increased noise levels.

Mitigation Measure BIO-5 (*Implement Biological Construction Monitoring*) requires that a qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special-status species. Any special-status terrestrial species found within a VSSP impact area shall be relocated by the authorized biologist to suitable habitat outside the impact area (permits and/or MOU's may be required for some species). Clearance surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day during initial ground disturbance, and weekly thereafter.

To minimize impacts to special-status mammal species a suite of mitigation measures has been developed and are described under Impact BIO-16. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities.

Mitigation Measures NOI-2 *(Implement Best Management Practices for Construction Noise)* would require the use of noise-suppression techniques, to the extent feasible, during

construction and Mitigation Measure BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to special-status mammals to the extent possible and reduce impacts to a less-than-significant level.

B1-71 As stated under Impact BIO-1, the majority of VSSP related impacts (permanent and temporary) would occur within disturbed/ruderal habitat, agricultural lands, and urban/developed areas. Impacts would include a total of 0.20 acres of permanent and 6.16 acres of temporary impacts to riparian habitats or sensitive natural communities. The proposed impact corridor for the VSSP is shown on EIR Figures C.5-1a through C.5-1d (also see response to Comment B1-29). These figures show the location of vegetation communities and land cover types occurring within both the survey area and impact corridor. Table C.5-9 of the EIR lists each of the vegetation communities and land cover types that occur within the proposed impact corridor along with the acreages of permanent and temporary impacts. EIR Figures C.5-4a through C.5-4d show the location of special-status plant species within the Survey Area in relation to the proposed impact corridor.

As stated under Impact BIO-17, more than half of the rare plants identified in the VSSP site are ranked as CRPR 4 species. CRPR 4 species are plants of limited distribution or infrequent throughout a broader area of California, and their vulnerability or susceptibility to threat appears low at this time (CNPS, 2010). Very few CRPR 4 plants meet the definition for State or federal listing (CNPS, 20010). Nevertheless, they may be locally significant if, for example, they occur at the periphery of their geographic ranges, exhibit unusual morphology, or occur in atypical habitats. However, these species do not represent unique or rare populations nor do they occur at the margins of their known ranges. Therefore, impacts of the VSSP are considered adverse but not significant (Class III) and do not reach the threshold for significance under CEQA. Although impacts to these plants are not considered significant, mitigation for other species, including the acquisition of lands for burrowing owl, and impacts to sensitive vegetation communities, will reduce impacts to these species should they occur on the acquired parcels.

B1-72 As stated in Mitigation Measure BIO-18 (*Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, Candidate, or other Special-Status Plants and Implementation of Avoidance Measures*),[1] prior to initial ground disturbance and for undisturbed areas in subsequent construction years, SCE shall conduct pre-construction surveys for special-status plant species in all areas subject to ground-disturbing activity, including, but not limited to, tower/pole preparation and construction areas, assembly yards, and areas subject to grading for new access roads; a survey buffer of 50 feet is required to comply with the minimum avoidance buffer (50 feet) required as part of the same measure. The surveys shall be conducted during the appropriate blooming period(s) by a qualified plant ecologist/biologist, approved by the CPUC, according to protocols established by the USFWS, CDFW, and California Native Plant Society (CNPS). All listed plant species found shall be marked and avoided. Any populations of special-status plants found during surveys will be fully described, mapped, and a CNPS Field Survey Form or written equivalent shall be prepared.

Mitigation Measure BIO-24 (*Compensate for Impacts to Special-Status Plant Species*)[2] states that if VSSP related impacts result in the loss of more than 10 percent of the on-site population of

[1] Mitigation Measure BIO-24 was removed and combined with BIO-18 in the Final EIR.

[2] Previously Mitigation Measure BIO-25 in the Draft EIR.

any special-status plant species, compensatory mitigation will be required. Prior to the disturbance of habitat for or take of special-status plants/populations, SCE must receive CPUC approval of preserved and/or mitigation lands as well as present documentation of a recorded conservation easement(s). Compensation will be required for all impacts that exceed the 10 percent threshold (e.g. impacts to 15% of a population will only require compensation for 5% or the amount of impacts that exceed the 10% threshold). The 10 percent threshold for on-site populations is a valid approach that has been approved as part of many projects under the purview of the CPUC.

B1-73 As stated in Mitigation Measure BIO-24 (*Compensate for Impacts to Special-Status Plant Species*),[3] to compensate for permanent impacts to special-status plant species, habitat (which may include preservation of areas within the undisturbed areas of the VSSP footprint, mitigation lands outside of the VSSP site or a combination of both) that is not already public land shall be preserved and managed in perpetuity at a 1:1 mitigation ratio (one acre preserved for each acre impacted). Compensation for temporary impacts shall include land acquisition and/or preservation at a 0.5:1 ratio. The preserved habitat for a significantly impacted plant species shall be of equal or greater habitat quality to the impacted areas in terms of soil features, extent of disturbance, vegetation structure, and will contain verified extant populations, of the same size or greater, of the special-status plants that are impacted. Impacts could include direct impacts resulting from loss of habitat or indirect impacts if a significant population or portion thereof is unable to be avoided.

A conservation easement would need to be recorded on all property associated with the mitigation lands to protect the existing plant resources in perpetuity. A conservation easement could be held by CDFW or an approved land management entity and must be recorded immediately upon the dedication or acquisition of the land. Preserved or acquired mitigation lands will be monitored and maintained per the requirements set forth in the Habitat Mitigation and Monitoring Plan prepared for the Project (Mitigation Measure BIO-17).

B1-74 As stated under Impact BIO-18, construction of the VSSP would temporarily affect foraging and breeding habitat for this species. The potential effects of the Project to burrowing owls depend on many factors including the number of owls present in the VSSP and how the species utilizes the area (i.e., migratory stopover, year round, breeding, or wintering). For the VSSP, the burrowing owls appear to be breeding birds and may be year round residents. Direct impacts to burrowing owls would include the crushing of burrows, removal or disturbance of vegetation, increased noise levels from heavy equipment, increased human presence, and exposure to fugitive dust. Indirect impacts could include the loss of habitat due to the colonization of noxious weeds, mowing or grazing of existing vegetation and the degradation of foraging habitat. Operational impacts include increased human presence from maintenance personnel that would flush or otherwise disturb burrowing owls, weed control, and use of access roads.

A suite of mitigation measures has been developed to minimize impacts to burrowing owl and are listed under Impact BIO-18 in the EIR. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development and implementation of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other

[3] Ibid.

construction related activities, and clearance surveys prior the start of construction activities. Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*) requires compensation for impacts to annual grassland habitat, which is known to support species such as burrowing owl; therefore, no additional compensation for impacts to burrowing owl habitat is needed.

Mitigation Measure NOI-2 *(Implement Best Management Practices for Construction Noise)* would require the use of noise-suppression techniques, to the extent feasible, during construction. Mitigation Measure BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to burrowing owl to the extent possible and reduce impacts to a less-than-significant level.

B1-75 As stated in Mitigation Measure BIO-25 (*Complete Focused Pre-construction Burrowing Owl Surveys and Implement Avoidance Measures*),[4] unless otherwise authorized by CDFW and the CPUC, a 250-foot buffer, within which no activity will be permissible, will be maintained between VSSP activities and nesting burrowing owls during the nesting season. This protected area will remain in effect until 31 August or based upon monitoring evidence, until the young owls are foraging independently. For burrowing owls present during the non-breeding season (generally 1 September to 31 January), a 150-foot buffer zone will be maintained around the occupied burrow(s).

The 2012 CDFW Staff Report on Burrowing Owl Mitigation (2012 Staff Report) provides guidelines on buffer requirements for nesting sites during different periods of the year. The 2012 Staff Report also states that site-specific monitoring should be conducted to inform the development of buffers and that the proposed general guidelines for implementing buffers should be adjusted to address site-specific conditions. Additionally, the 2012 Staff Report states that based on existing vegetation, human development, and land uses in an area, resource managers may decide to allow human development or resource extraction closer to these areas/sites than recommended in the 2012 Staff Report. Implementation of the 250-foot buffer for active nests is currently being used on current projects in coordination with the CDFW.

Although the 2012 Staff Report indicates a table nesting season from 1 April – 15 August, the owls have been found to nest and/or pair up as early as 1 Feb in some areas. The 2012 Staff Report recommends earlier on in the report that you avoid disturbing occupied burrows during the nesting period, from 1 February through 31 August.

A suite of mitigation measures has been developed to minimize and avoid impacts to burrowing owl; these measures are presented under Impact BIO-18. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*) requires compensation for impacts to annual grassland habitat, which is known to

[4] Previously Mitigation Measure BIO-26 in the Draft EIR.

support species such as burrowing owl; therefore, no additional compensation for impacts to burrowing owl habitat is needed.

Furthermore, Mitigation Measure NOI-2 (*Implement Best Management Practices for Construction Noise*) would require the use of noise-suppression techniques, to the extent feasible, during construction and Mitigation Measure BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*) includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to burrowing owl to the extent possible and reduce impacts to a less-than-significant level.

B1-76 As stated under Impact BIO-19, an assessment of jurisdictional wetlands, other "waters of the U.S.," waters of the State, and riparian habitat has been conducted for the VSSP site; the assessment identified approximately 4.64 acres of jurisdictional features within proposed Project impact areas (see Figures C.5-2a-g in the EIR). Based on the tentative design information provided by SCE, construction of the VSSP components would result in the permanent loss of 0.01 acres of federally jurisdictional wetlands and CDFW jurisdictional waters. The VSSP would also temporarily impact 1.48 acres of federal wetlands and 0.31 acres of non-wetlands waters, 0.39 acres of RWQCB non-wetland waters, and 2.43 acres of CDFW jurisdictional waters. These impact acreages are based on the proposed impact corridor provided for analysis in the EIR; the actual area impacted will be significantly less once the final design of the VSSP is complete.

SCE has committed to avoiding impacts to jurisdictional features for the entire VSSP (refer to APM BIO-8, Table B-18, Section B.7 of the EIR); should this not be feasible during construction, impacts to jurisdictional features would occur as described under Impact BIO-19 in Section C.5.4.2 of the EIR.

In addition, Mitigation Measure BIO-13 (*Avoid Seasonal Depressions and Known Waterbodies*) requires SCE to avoid all seasonal/ephemeral depressions, vernal pools and known waterbodies that occur within the project site which would avoid impacts to potentially jurisdictional waters. If it is determined that jurisdictional wetlands or waters can't be avoided, as stated under Impact BIO-19, SCE would comply with the regulations regarding conducting VSSP activities in water courses and habitats under the jurisdiction of the State and federal government. Therefore, SCE would obtain required permits pursuant to Section 401 and 404 of the CWA, the State Porter-Cologne Act, and Fish and Game Code Section 1605 and implement all mitigation requirements detailed in each of the required permits. Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*) will also serve to minimize impacts to potentially jurisdictional waters by requiring compensation for permanent impacts to sensitive vegetation communities. More than 80% of the sensitive communities identified within the VSSP generally occur within riparian or wetland habitats that fall under the jurisdiction of Section 401 and 404 of the CWA, the State Porter-Cologne Act, and Fish and Game Code Section 1605.

CEQA does not require that resource agency permits be obtained or the process by which they are obtained be completed or started as part of the EIR. In addition, there has been no decision on the Project. Resource agency permits are obtained after there is an approval on the discretionary permit/decision, in this case the CPUC decision on the Project.

B1-77 The MSHCP is a very large document and for that reason has not been appended to the EIR or included as part of the administrative record. The complete text of the MSHCP is readily available online at the website address noted below. If a Determination of Biologically

Equivalent of Superior Preservation (DBESP) is required as part of SCE's application to become a PSE with the MSHCP, it will be prepared at that time and is not required as part of the EIR. The EIR provides mitigation measures that require compensation for permanent and temporary impacts to habitat. If SCE becomes a PSE with the MSHCP compensation for these impacts may be achieved through their participation and no further compensation will be required (including that proposed in the EIR).

http://www.rctlma.org/Portals/0/mshcp/volume1/index.html

B1-78 While the overall duration of construction for the VSSP is estimated to be 16 months, construction activities will only occur in one area for a much shorter period. As stated under Impact BIO-20, the California Missing Linkages Project (CMLP) has identified an at-risk habitat linkage area that crosses Leon Road, just north of Baxter Road, in the Survey Area (Penrod et al., 2001). The VSSP occurs within the CMLPs defined South Coast ecoregion; this ecoregion had the most at-risk linkage areas within the State. The CMLP has identified the at-risk habitat linkage area, occurring within the VSSP, as South Coast Ecoregion No. 58, Tucalota Creek. Types of threats listed for Tucalota Creek include housing development, human recreation, and exotic plants (Penrod et al., 2001).

However, there are no known bird or bat migratory corridors that would be directly impeded by the VSSP. Large concentrations of migrants are not known to utilize any specific portion of the VSSP site and VSSP activities are not expected to preclude use of the area. Although species would be disrupted during certain activities impacts to migratory corridors from the proposed Project would not be significant.

As stated under Mitigation Measure BIO-4 (*Develop a Habitat Restoration and Monitoring Plan*), SCE will be required to restore temporarily disturbed areas to pre-construction conditions or better and provide for habitat creation/restoration resulting from permanent impacts to sensitive vegetation communities (refer to Mitigation Measure BIO-3). A minimum requirement of the plan is to create a proposed schedule for all restoration and/or habitat creation shall be provided. When applicable restoration or habitat creation activities shall occur once construction activities are complete within a specific area; the proposed Project area should be broken up into sections based on the required construction activities. Once construction is complete within a defined section restoration and/or habitat creations should commence. Restoration and/or creation of habitat should occur within an appropriate window for each specific community and species makeup (i.e., impacts to habitat during the summer months may not be initiated until the fall to promote native seed germination).

B1-79 Please refer to response to Comment B1-76 regarding impacts to jurisdictional wetlands and waters. As stated under the Criterion BIO1 heading in Section C.5.4.3 of the EIR, the majority of the impacts from the VSSP are temporary in nature. Mitigation Measures BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)* and BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)* would require compensation for permanent impacts to riparian habitat and sensitive communities and develop a plan for the restoration of all temporarily impacted habitats. With the implementation of these mitigation measures, the cumulative contribution of the VSSP to riparian habitats and sensitive communities would be less than significant.

B1-80 As stated under Criterion BIO2 in Section C.5.4.3 of the EIR, construction and operation of the VSSP would combine with the construction and operation for other projects in the defined

geographic extent to result in significant cumulative impacts to threatened or endangered plants and wildlife. Implementation of Mitigation Measures BIO-1 through BIO-18 require compensation for permanent impacts to riparian habitat and sensitive communities, development of a plan for the restoration of all temporarily impacted habitats, focused pre-construction surveys for listed species, and compensation for impacts to listed species and/or their habitats. With the implementation of these mitigation measures, the cumulative contribution of the VSSP to listed plant and wildlife species would be less than significant.

B1-81 As stated under Criterion BIO3 in Section C.5.4.3 of the EIR, construction and operation of the VSSP would combine with the impacts from construction and operation for other projects in the defined geographic extent to result in significant cumulative impacts to threatened or endangered plants and wildlife. Implementation of Mitigation Measures BIO-1 through BIO-25 require compensation for permanent impacts to riparian habitat and sensitive communities, development of a plan for the restoration of all temporarily impacted habitats, focused pre-construction surveys for listed and special-status species, and compensation for impacts to listed and special-status species and/or their habitats. With the implementation of these mitigation measures, the cumulative contribution of the VSSP to special-status plant and wildlife species would be less than significant.

B1-82 Please refer to response to Comment B1-76 regarding impacts to jurisdictional wetlands and waters and required compensation.

B1-83 As stated under Criterion BIO5 in Section C.5.4.3 of the EIR, although construction activities may temporarily limit terrestrial wildlife movement within the VSSP, the broad geographic range and habitat that occurs in the region would remain available to wildlife. The VSSP would not substantially interfere with the movement of any native resident or native resident or migratory fish, reptile, avian, mammalian, or amphibian species. However, cumulative impacts of the VSSP when combined with impacts from the reasonably foreseeable projects have the potential to substantially reduce the size of movement corridors and alter the movement patterns.

There is no known bird or bat migratory corridors that would be directly impeded by the VSSP. Large concentrations of migrants are not known to utilize any specific portion of the VSSP site and VSSP activities are not expected to preclude use of the area.

Large areas of foraging habitat still remain in Western Riverside County and wildlife would likely disperse to those areas both during construction of the VSSP and other reasonably foreseeable projects in the defined geographical extent. While the VSSP itself only represents a small portion of the available habitat in the region, the impacts of the VSSP and reasonably foreseeable projects would be cumulatively significant. Implementation of Mitigation Measures BIO-1 through BIO-5, and BIO-7 would reduce the proposed Project's incremental contribution to cumulative impacts to wildlife movement to less than cumulatively considerable.

<u>Cultural and Paleontological Resources</u>

B1-84 The commenter notes that portions of Mitigation Measure CR-1 (e.g., focused surveys for any Project area not yet surveyed) should have happened prior to CEQA review. EIR Section C.6.1.1 (Approach to Data Collection) notes that pedestrian field surveys were conducted within the Project alignment prior to the CEQA review. Mitigation Measure CR-1 (*Avoid Environmentally Sensitive Areas*) states that SCE shall perform focused pre-construction surveys for any project areas not yet surveyed (e.g. new or modified staging areas, pull sites, or other work areas). This

mitigation measure assures that if any portion of the Project alignment is modified after the CEQA review, the area will be subjected to a cultural pedestrian survey.

B1-85 The commenter notes that Mitigation Measure CR-2 (*Cultural Resource Management Plan [CRMP]*) should have been developed already in consultation with relevant Tribes. If the Project is approved by the CPUC and the Final EIR is certified as compliant with the California Environmental Quality Act, then SCE will be required to comply with all requirements of the EIR and obtain ministerial or resource agency permits as applicable. This would apply to the implementation of the CRMP, which will be required after a decision is made on the Project.

In addition, Mitigation Measure CR-2 requires that the CRMP be developed and reviewed in consultation with appropriate Native American tribes. More specificity was added to this measure based on consultation with the tribes as part of the EIR preparation. This consultation is documented in Section F (Public Participation and Consultation) of the EIR and was updated to include more recent consultation during preparation of the Final EIR.

B1-86 The commenter notes that Mitigation Measure CR-3 (*Train Construction Personnel*) is good in theory, but the equipment SCE will be using will likely destroy any buried artifacts without anyone knowing it. Impact CR-1 discloses that buried cultural resources could be inadvertently unearthed during ground-disturbing activities. To address this potential impact, Mitigation Measure CR-3 requires training of personnel by a qualified archeologist and a member of the Pechanga tribe (as revised in the Final EIR). The intent of the training is to provide background on where and what type of resources might be found. A qualified archeologist will be onsite, as required by Mitigation Measure CR-4 *(Conduct Construction Monitoring)* to monitor sensitive areas that have been identified within the project corridor and Mitigation Measure CR-6 (*Treat Previously Unidentified Cultural Resources*)[5] requires that resources be evaluated by the qualified archeologist.

B1-87 The commenter notes that Mitigation Measure CR-4 (*Construction Monitoring*) only occurs within 100 feet of a cultural resource Environmentally Sensitive Area (ESA) and that cultural resources may exist in other Project areas. As noted in Mitigation Measure CR-2 (*Cultural Resource Management Plan [CRMP]*), additional areas that are considered to be of high-sensitivity for discovery of buried cultural resources will also be monitored during construction. In addition, Mitigation Measure CR-6 (*Treat Previously Unidentified Cultural Resources*)[6] states that if previously unidentified cultural resources are unearthed during construction activities, construction work in the immediate area of the find shall be halted and directed away from the discovery until a qualified archaeologist assesses the potential significance of the resource.

B1-88 The commenter notes that Mitigation Measure CR-5 (*Native American Consultation*) states that it will cover matters decided upon to be included in the CRMP within 30 days of construction, which conflicts with the timeline (60 days) noted in Mitigation Measure CR-2. The timeline of Native American Consultation (MM CR-5) has been revised to 60 days prior to construction.

B1-89 The commenter notes that Mitigation Measure CR-6 (*Treat Previously Unidentified Cultural Resources*)[7] should include tribes in notification and participation, not just a qualified archaeologist. Mitigation Measure CR-6 states that a qualified archaeologist will assess the

[5] Previously Mitigation Measure CR-7 in the Draft EIR.

[6] Ibid.

[7] Ibid.

potential significance of the resource. Once the find has been inspected and a preliminary assessment made, SCE will consult with the CPUC to make the necessary plans for evaluation and treatment of the find(s). Based on consultation with the Pechanga Tribe, Mitigation Measure CR-6 has been revised to include reference to the required CRMP (MM CR-2); the CRMP requires consultation with the Pechanga Tribe as well as requires that mitigation and treatment plans for unanticipated discoveries be reviewed by appropriate Native Americans prior to implementation.

B1-90 The commenter states that identified mitigation measures may result in the recovery of some paleontological resources, however, "driving in of poles" may damage these resources.

Impact CR-3 in Section C.6.4.2 (Impact Analysis – Direct and Indirect Effects) states that construction of the proposed Project has the potential to destroy or disturb significant paleontological resources. This impact discussion also states that impacts to paleontological resources may occur during construction-related ground disturbances, including augering, grading and excavation activities. It is explained in the EIR that Project impacts, including ground disturbance related to pole installation, would be reduced with implementation of Mitigation Measures CR-8 *(Inventory and Evaluate Paleontological Resources)*, CR-9 *(Develop Paleontological Resource Mitigation and Monitoring Plan)*, CR-10 *(Train Construction Personnel)*, CR-11 *(Monitor Construction for Paleontological Resources)*, and through CR-12 *(Final Reporting and Curation)*[8]. The EIR does not contend that Project-related ground-disturbing activities present no risk for damage or disturbance of paleontological resources; on the contrary, the EIR concludes that adverse impacts are likely to occur, but they can be mitigated to a less-than-significant level through Mitigation Measures CR-8 through CR-12, which would provide for the successful recovery, identification, and curation of previously undocumented fossils.

Geology and Soils

B1-91 Although GO 95 does not include specific seismic criteria, it does include wind loading design criteria. As stated in the Impact GEO-3 discussion, wind loading criteria and standards exceed seismic loading criteria. Therefore, poles that are designed for wind loading per GO 95 will also be adequately designed for any seismic loading (i.e. groundshaking). Both GOs also indicate that "Construction shall be according to accepted good practice for the given local conditions in all particulars not specified in the rules."

B1-92 Your comments and concerns have been noted.

Greenhouse Gas Emissions

B1-93 The emissions of SF_6 are regulated, and responsible parties using SF_6 insulated electrical equipment must meet regulatory standards for annual SF_6 leakage rates. By 2020, the overall annual leakage rate limit for SF_6 containing equipment owning/operating parties, such as SCE, is one percent. New equipment has lower emissions rates than older equipment, so looking at existing average leakage rates would overestimate the leakage rates for new equipment. The leakage rate used in the GHG emissions calculation was 0.5 percent (Appendix 2, Table 33). Vendor data from Siemens indicates that new high voltage (>72.5 kV) gas insulated switchgear (GIS) equipment has guaranteed leakage rates of less than one percent per year. Therefore, the

[8] The number of these mitigation measures has changed from the Draft to the Final EIR because Mitigation Measure CR-5 *(Reduce Adverse Visual Impacts)* was removed as a mitigation measure for the proposed Project based on consultation with the Pechanga Tribe.

emissions rate of SF_6 from the new equipment for the proposed Project using an actual estimated leakage rate of 0.5 percent is reasonable. If a rate of one percent were used, it would have increased the estimated annual carbon dioxide equivalent (CO2e) emission by 9 metric tons per year, which would not change any of the GHG emissions impact determinations in the EIR. No changes to the Final EIR are required.

B1-94 The assertion made in the Draft EIR regarding SCAQMD having a recommended CEQA threshold for GHG emissions is accurate. That GHG emissions threshold can be clearly seen in the SCAQMD CEQA thresholds table found on their CEQA Air Quality Analysis Handbook website (http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2). A reference to that table was specifically provided in the Draft EIR references (SCAQMD, 2015e). Amortizing construction emissions is the SCAQMD accepted method to address total project emissions. The SCAQMD provided no comments on the Draft EIR.

Hazards and Hazardous Materials

B1-95 As stated under Mitigation Measure BIO-2 (*Implement Best Management Practices*), one of the project goals is to avoid and minimize vegetation removal within active construction areas to the extent possible. However, as discussed under Impact BIO-1 in Section C.5.4.2 of the EIR, based on the proposed impact corridor provided by SCE for analysis in the EIR, construction of the VSSP would result in approximately 9.95 acres of permanent and 218.39 acres of temporary impacts to vegetation communities and land cover types. A smaller portion of these acreages (0.20 acres permanent and 6.16 temporary) would occur in riparian habitats and sensitive vegetation communities. As described under Mitigation Measure BIO-2, all sensitive communities will be flagged prior to the start of construction and avoided to the extent possible. Also, Mitigation Measure BIO-3 *[Compensation for Permanent Impacts to Sensitive Vegetation Communities]* requires mitigation for sensitive vegetation communities.

Hydrology and Water Quality

B1-96 Mitigation Measure HYD-1 (*Use Non-potable Water*) requires the use of non-potable water for dust control, soil compaction activities, and site restoration/revegetation, if available, and ensured in a water contract through a local water agency. SCE will be required to provide a letter regarding the availability of non-potable water and document efforts made to obtain it at least 60 days prior to construction. For projects where water is essentially only required for construction and not on an ongoing basis, such as for a residential or commercial project, applicants do not need to identify a source prior to project approval. These details are often determined by the construction contractor and such requirements become part of the contract between the applicant and its contractor(s).

Land Use

B1-97 As noted in Section C.11.2.3 (Local), investor-owned utilities are exempt from local land use and zoning regulations. The CPUC regulates and authorizes the construction of investor-owned utilities and has jurisdiction over the siting and design of electrical transmission projects such as the VSSP. Local land use plans were evaluated in the EIR to provide information on the Project's potential consistency with local policies even though there is no requirement for this evaluation. The commenter is correct in noting that some of the policies identify undergrounding of utilities (e.g. power, cable). Although some of the local land use plans address utilities, the policies focus on distribution and not subtransmission lines as proposed by the VSSP.

B1-98 Section C.11 (Land Use and Planning) identified the City of Menifee Policy OSC-3 and provided a consistency review based on information presented and evaluated in Section C.2 (Aesthetics). The Aesthetics section considered scenic vistas and scenic resources and evaluated whether or not the proposed Project would have the potential to impact scenic resources. The assessment provided in Criterion AES3 and Criterion AES4 includes detail on why the Project was determined to have no impact on scenic vistas or scenic resources (e.g. distance from the Project site, no designated scenic vistas). See Section C.2 (Aesthetics) for more detail.

B1-99 See response to Comment B1-97.

Noise

B1-100 As stated under Impact NOI-1, the proposed construction schedule is Monday through Saturday from 6:00 a.m. to 6:00 p.m., which would be inconsistent with local standards. However, Mitigation Measure NOI-1 (*Construction Work Hours*) identifies hours of construction by agency to maintain compliance with the local standards and requires SCE to notify the CPUC, the local jurisdiction, and residences within 300 feet of the anticipated work if these hours will not be met. Mitigation Measure NOI-1 has also been revised in the Final EIR to note that SCE shall route all construction traffic away from residences, schools, and recreational facilities to the maximum extent feasible.

B1-101 The commenter contends that construction noise would substantially exceed the existing noise levels, be within 50 feet of sensitive receptors, and that limiting construction work hours (Mitigation Measure NOI-1) and placing mufflers on construction equipment and setting up a hotline (Mitigation Measure NOI-2) would not reduce impacts to a less-than-significant level. As stated under Impact NOI-1, the highest modeled noise level of approximately 86 dBA Leq at 50 feet (for TSP installation) would substantially exceed daytime ambient noise levels; however, from a disturbance standpoint, construction equipment would not operate continuously in one position all day long and construction activities would move along the 15.4-mile alignment over the 16-month construction period, such that the overall daily noise levels would not increase substantially. Furthermore, construction activities are expected during daytime hours, but are limited to the least sensitive hours of the day and days of the week, as indicated in the local plans and ordinances. Mitigation Measure NOI-1 (*Construction Work Hours*) ensures the Project's construction activities occur during these less sensitive times, unless required otherwise with proper notification so that disturbances can be minimized. For example, if residences know that construction will be occurring, they can close windows and doors to reduce the noise levels in their homes. Mitigation Measure NOI-2 (*Implement Best Management Practices for Construction Noise*), requires far more noise-suppression techniques than indicated in the comment. Noise-limiting techniques include use of electric-powered equipment as opposed to pneumatic or internal combustion power equipment, limiting use of noise-producing signals except for safety warning purposes, limiting engine idling, and routing construction traffic away from residences, schools, and recreational facilities.

B1-102 For Impact NOI-7 the vibration threshold for annoyance of 70 VdB or 0.10 in/sec peak particle velocity (PPV) was used to assess the excessiveness of ground-borne vibration or noise. This analysis does not pertain to compliance with local ordinances, such as Murrieta Municipal Code Section 16.30.130(K), which has a perception threshold of 0.01 in/sec over the range of 1 to 100 Hertz at 150 feet from the source. As discussed under "General Information on Vibration", vibration is generally related to trains, large vehicles on rough roads, and construction activities such blasting, pile driving, and operating heavy earth-moving equipment. As described under

Impact NOI-7, paved roads are located along the proposed 115-kV alignment such that trucks (haul or material delivery trucks) are not anticipated to result in perceptible ground-borne vibration. As such, the analysis focuses on construction equipment that would have the potential to result in ground-borne vibration and provides an example of 150 HP track type dozer (0.003 in/sec PPV at 25 feet). As additional information to respond to the comment, a large bulldozer would have an approximate vibration level of 0.089 in/sec PPV at 25 feet, and a loaded truck would have an approximate vibration level of 0.076 in/sec PPV at 25 feet (FTA, 2006 – Table 12-2), which could be representative of a semi-tractor and auger truck, respectively. These expected ground-borne vibration levels are below the threshold, and would likely be lower than reported due to the reduced vehicle speed requirements (limited to 15 mph per APM AIR-1). Furthermore, as stated in the EIR, ground-borne vibrations would attenuate rapidly (i.e., within 200 feet or less) such that vibration levels would not be excessive.

Transportation and Traffic

B1-103 Mitigation Measure TRA-1 (*Construction Traffic Control Plan*) requires SCE to coordinate in advance with emergency service providers to avoid restricting the movements of emergency vehicles. Police departments and fire departments would be notified in advance by SCE of the proposed locations, nature, timing, and duration of any roadway disruptions, and would be advised of any access restrictions that could impact their effectiveness. At locations where roads will be blocked, provisions would be ready at all times to accommodate emergency vehicles, such as immediately stopping work for emergency vehicle passage, providing short detours, and developing alternate routes in conjunction with the public agencies. As such, the Mitigation Measure TRA-1 would effectively mitigate impacts to emergency service vehicles.

Alternatives Analysis

B1-104 As stated in EIR Section D.3.1 (Alternative 1: Subtransmission Line Route Alternative Along Menifee Road Description), the environmental setting for biological resources for Alternative 1 is similar to that of the proposed Project, although larger amounts of coastal sage scrub habitat known to support known populations of coastal California gnatcatcher could be impacted. Table D-6 (Comparison of Alternatives) has been revised to reflect that the biological resources impacts would be similar, not the same. Table D-6 clearly identifies that more cultural resources are present along the Alternative 1 route, and that paleontological resources are comparable since the proposed and Alternative 1 routes have similar geology. Impacts related to groundwater use are analyzed under Criterion HYD2/Impact HYD-2. These impacts are reduced to a less-than-significant level through Mitigation Measure HYD-1 (*Use Non-potable Water*), which would also be applied to Alternative 1 such that groundwater impacts between the proposed Project and Alternative 1 would essentially be the same despite the longer route.

B1-105 The commenter notes that Alternative 2 would add two months to the construction schedule and result in greater air quality impacts, more noise, and more significant traffic impacts. The analysis in EIR Section D.3.2 (Alternative 2: Partial Underground Alternative) states that Alternative 2 could substantially increase the maximum daily construction emissions, substantially increase the maximum daily localized construction emissions along the underground construction route, and increase fugitive dust emissions. For noise, the EIR concludes that given the greater construction effort required for trenching, vault installation, and the extended construction schedule, the magnitude of Alternative 2's disturbance to sensitive receptors would be greater than the proposed Project. Additionally, for Traffic and Transportation, the EIR states that Alternative 2 would result in increased roadway disruption

impacts compared with the proposed Project, and is also expected to result in slightly increased temporary daily trip generation during construction. The same mitigation would apply to Alternative 2 as for Alternative 1, reducing these impacts to the extent feasible. Table D-6 (Comparison of Alternatives) reflects these differences between SCE's proposed Project and Alternative 2.

Additional CEQA Considerations

B1-106 The quoted text from page A-2 summarizes SCE's objective for the Project, which is to "add capacity to the system to prevent outages and to serve long-term forecasted electrical demand requirements in the area served by the system." Growth-inducing impacts are discussed in EIR Section E.4, where it is acknowledged that while "the proposed Project would not directly result in growth in the area, its implementation would remove future obstacles to population growth by facilitating the transmission of future projected power generation in the proposed Project area."

B1-107 The conclusions of the EIR have not changed as a result of the comments provided. The significant effects of the Project remain as stated in EIR Section E.2 (Significant Effects that Can Not be Avoided).

B1-108 Your comments have been noted.

B1-109 Section E.3 of the EIR has been revised to reflect impacts of approximately 10 acres of permanent and approximately 218 acres of temporary disturbance to native and non-native vegetation. These acreages are based on the biological resources evaluation presented in Section C.5 of the EIR.

B1-110 As stated in EIR Section E.4 (Growth-Inducing Impacts), while "the proposed Project would not directly result in growth in the area, its implementation would remove future obstacles to population growth by facilitating the transmission of future projected power generation in the proposed Project area." The population data presented in Table E-1 comes from SCE's Application (Table 4.13-1, Historic and Estimated Population in Surrounding Jurisdictions), and is sourced to the California Department of Finance (2012) Historic Population Estimates for Cities, Counties, and the State, 2001-2010, with 2000 & 2010 Census Counts (http://www.dof.ca.gov/research/demographic/reports/estimates/e-4/2001-10) and Southern California Association of Governments (2012) Adopted Growth Forecast (http://www.scag.ca.gov/forecast/idex.htm). Also see response to Comment B1-106.

Comment Set B2 – Pechanga Band of Luiseño Indians

Pechanga Tribe CMnts DEIR Valley South Subtransmission Project

Anna Hoover <ahoover@pechanga-nsn.gov>

Mon 3/14/2016 5:03 PM

To:Valley-South- Project <Valley-South-Project@aspeneg.com>;

Cc:Ebru Ozdil <eozdil@pechanga-nsn.gov>; Andrea Fernandez <afernandez@pechanga-nsn.gov>;

To Whom it May Concern;

These comments are written on behalf of the Pechanga Band of Luiseño Indians (hereinafter, "the Tribe"), a federally recognized Indian tribe and sovereign government. The Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire CEQA environmental review process for the duration of the above referenced project (the "Project"). Please add the Tribe to your distribution list(s) for public notices and circulation of all documents, including environmental review documents, archeological reports, and all documents pertaining to this Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project. Please also incorporate these comments into the record of approval for this Project. **B2-1**

The Tribe has reviewed the proposed mitigation measures in the Draft Environmental Impact Report (DEIR). Although we understand that development of the Cultural Resources Magagement Plan (CRMP) is intended to provide additional consultation and input from the Pechanga Band, it is not stated as such and is unclear as to its intent. Additionally, there are several locations in the mitigation measures (MM) that simply remove Tribal input from the process and appear to allow removal/direct impacts to potential human remains. The Tribe would like to consult with the CPUC as we have not had the opportunity to do so on this Project, in order to review and discuss our concerns and requested edits further. Our edits to the portions of concern in the MM are provided below (underlines are additions; strikethroughs are deletions): **B2-2**

CR-1 **Avoid Environmentally Sensitive Areas** SCE shall perform focused pre-construction surveys for any project areas not yet surveyed…Resources discovered during the surveys, as well as all other resources identified within the APE, would be subject to Mitigation Measure CR-2…and CR-4… **B2-3**

CR-2 **Develop Cultural Resource Management Plan (CRMP)** SCE, in consultation with the Pechanga Band of Luiseno Indians, shall prepare and submit for approval a CRMP to guide all cultural resource management activities during Project construction….

The CRMP shall detail how all known ~~CRHR-eligible~~ cultural resources within the Project area will be avoided or treated. The CRMP shall define a constriction procedures for areas near known/recorded cultural sites. Wherever a pole, access road, equipment, etc., must be places or accessed within 100 feet of a recorded, reported, or known cultural resources eligible or potentially eligible for the CRHR, the site will be flagged on the ground as an ESA, unless otherwise agreed to by the CPUC and the Pechanga **B2-4**

Comment Set B2 – Pechanga Band of Luiseño Indians (Cont.)

Tribe…Archaeological and Tribal, monitoring of Project construction shall be focused in the immediate vicinity of the designated ESAs, unless otherwise directed in the CRMP as determined by the CPUC and the Pechanga Tribe.

-

…For all unanticipated cultural resource discoveries, the CRMP shall detail the methods, the consultation procedures, and the timelines for assessing CRHR eligibility, determining if avoidance is feasible, formulating a mitigation plan if required, and implementing treatment. Mitigation and treatment planned for unanticipated discoveries (except for human remains, grave goods and sacred/ceremonial objects which will be addressed in CR-8) shall be reviewed by appropriate Native Americans and approved by the CPUC and the OHP prior to implementation.

B2-4 Cont.

CR-3 Train Construction Personnel Prior to the initiation of construction, all construction personnel shall be trained, by a qualified archaeologist and a representative from the Pechanga Tribe, regarding the recognition of possible buried cultural resources…

B2-5

The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts.

B2-6

The Pechanga Tribe looks forward to working together with the CPUC in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at the information below so we can schedule a consultation meeting.

Noɬúun Lóoviq (Thank you),

Anna M. Hoover
Cultural Analyst
Pechanga Band of Luiseno Indians
P.O. Box 2183
Temecula, CA 92593

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Responses to Comment Set B2

B2-1 The commenter formally requests to be notified and involved in the CEQA environmental review process, to be added to the distribution list for public notices and documents, and to be directly notified of all public hearings and scheduled approvals concerning the Project. During initial consultation for the Project, the Pechanga Tribe made the above request and was added to the distribution list for public notices and circulation of all documents. Further, the CPUC provided a hard copy of the Project Draft EIR to the Pechanga Tribe for review. The Pechanga Tribe will continue to receive notifications regarding the CEQA environmental review process.

B2-2 The commenter is concerned about the lack of Tribal input in the development of the Cultural Resource Management Plan (CRMP) and requested consultation to review and discuss concerns about the Project. During initial consultation (July 15, 2015), the Pechanga Tribe met with Aspen and Applied EarthWorks regarding the Project. Comments from the Pechanga Tribe were incorporated into the Draft EIR. On April 14, 2016, a conference call was held between the CPUC, CPUC consultant team, and the Pechanga Tribe to discuss the Tribe's comments on the Draft EIR. As a result of the call, revisions were made to the Cultural Resource mitigation measures to include the Pechanga Tribe in document review and monitoring efforts. During the conference call, the Pechanga Tribe also noted their concerns about indirect visual impacts of the Project to Double Buttes. A separate conference call was scheduled to discuss visual impacts to sensitive Native American cultural resources.

On April 26, 2016, a conference call was held between the CPUC consultant team and the Pechanga Tribe to review the potential for the Project to have an indirect visual impact to Double Buttes. Prior to the conference call, the CPUC consultant team conducted a brief viewshed analysis[9] of the northern Project area in relation to Double Buttes. Several factors were taken into consideration during the viewshed analysis, such as the specific locations on the western and eastern Double Buttes that are important to the Pechanga Tribe, existing conditions of the current landscape, and how the current landscape would change with the implementation of the Project. The additional viewshed research noted that the proposed Project would have an indirect visual impact to cultural resources and Double Buttes; however, the impact would not be significant. The Pechanga Tribe agreed that the proposed Project would not have a significant visual impact. Therefore, Mitigation Measure CR-6 (Reduce Adverse Visual Impacts) was removed from the Final EIR for the proposed Project.

B2-3 The commenter requested revisions to Mitigation Measure CR-1 to provide clarity. These edits have been accepted. Mitigation Measure CR-1 has been revised in the Final EIR.

B2-4 The commenter requested revisions to Mitigation Measure CR-2 to include the Pechanga Tribe as a reviewer of the CRMP, to provide clarity to unanticipated cultural resource discoveries, and provide tribal monitoring within the vicinity of ESAs. Mitigation Measure CR-2 has been revised in the Final EIR to incorporate the suggested changes.

B2-5 The commenter requested revisions to Mitigation Measure CR-3 to include a representative from the Pechanga Tribe to assist with training construction personnel. Mitigation Measure CR-3 has been revised in the Final EIR to incorporate the suggested changes.

[9] This analysis is confidential because of the discussion of tribal resources and is on file with the CPUC. This concise analysis was completed at the request of the Pechanga Tribe and for their use in evaluating the Double Buttes area.

B2-6 The Tribe notes that they reserve the right to fully participate in the environmental review process, provide further comment on impacts to cultural resources, and requests a consultation meeting. The CPUC consulted with the Pechanga Tribe to discuss Project mitigation and will continue to notify the Tribe regarding the Project EIR. Section F (Public Participation and Consultation) summarizes the consultation held with the Pechanga Tribe on this Project, including the recent consultation conducted prior to publication of the Final EIR.

Comment Set C1 – Angela Little

From: Angela Little <awlittle@msn.com>
Sent:Thu 2/11/2016 11:25 PM
To: Valley-South-Project

Greetings,

Thank you to the two ladies who came out to the Winchester MAC meeting this evening to make their presentation about the VSSP. We enjoyed having you there to discuss the availability of the Draft EIR and some of it's elements.

Having reviewed the draft EIR, my only comment is that it seems that the communities being served by this project would be getting a much needed improvement to the availability of both high and low voltage electrical services. In light of the thousands of users that will be coming to that corridor area in the years to come and to the extent that communities along the route of the VSSP will be able to tap into it's lines for electrical services, I applaud SCE for their forethought and planning to create the VSSP and to commission this EIR to determine how to mitigate its impacts. **C1-1**

I also have several questions that I would like to discuss with Aspen and/or SCE's VSSP team as follows:

1. Will you share the more detailed current plans regarding the VSSP along my property at the SW corner of Scott Rd. and Leon Rd.? **C1-2**
2. Will you share the biological, historical, or any other findings and/or the studies that were conducted on my property? **C1-3**
    - The draft EIR mentioned that five burrowing owls were found. Can you give their locations? **C1-4**
3. Would you be interested in using my property for materials storage and/or parking for workers, assuming that the timing works for both SCE and for me, after we discuss the rest of these items?
4. Would you be willing to discuss expanding SCE's easement, relocating, and undergrounding their lines, south of Scott Rd, adjacent to my property **C1-5**
    - per references to City of Menifee's General Plan Community Design Element on page C-11-17 (Land Use and Planning Section).
    - to their ultimate location upon the widening of Leon Rd, per City of Menifee's circulation element

If your staff at Aspen would be able to help with any of these items, especially item #2. That would be of tremendous help to me, as I am going to be conditioned to conduct my own biological and other studies in response to my application to rezone that corner from residential to commercial.

Sincerely,
Angela D. Little
951-775-1323

Responses to Comment Set C1

C1-1 Thank you for your comments. Your comment is noted regarding support of the Project.

C1-2 Based on the general description provided above, your property appears to be located in an area of upgraded right of way. As noted in the Project Description of the Draft EIR (page B-20), "upgrading easements may include land rights, adding width to existing easements, and improving or clarifying access or maintenance rights." Also, you may want to refer to Table B-3 of the Draft EIR (page B-19) that shows the right-of-way (ROW) requirements for the Project. As noted in the table, for areas of upgraded ROW the approximate width of the ROW would be approximately 16 to 55 feet.

C1-3 SCE conducted background studies along the proposed alignment of the Project and these studies are included as part of the Proponent's Environmental Assessment (PEA) that was submitted as part of SCE's application to the CPUC for a Permit to Construct. The Draft EIR includes a third-party evaluation of the data and updates some of the data presented in SCE's PEA. The background studies and the Draft EIR are found on the Project website noted below:

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

However, we should point out that the background studies were completed for the purposes of this Project and in some cases only include a specific distance on either side of the proposed ROW. For instance, the biology assessment included a 250-foot survey area on either side of the proposed Project alignment.

The locations of the burrowing owls can be found in Appendix F of SCE's PEA (Volume 4 of 4 [part 2 of 5]) in the Focused Burrowing Owl Survey Report, which is Appendix E of the Biological Resources Assessment. The Burrow Location Maps (Figures 3 and 4) include the locations of the burrowing owls identified in the background studies. This report can be found on the Project website (see website address above). In addition, Figures C.5-5a to C.5-5d of the Valley South Final EIR have been revised to identify the location of four burrowing owl locations near the proposed Project alignment. A fifth location is more than 2,000 feet from the project alignment (outside of the study area). The text in Section C.5, Biological Resources, has been revised to identify four burrowing owl locations near the project alignment.

C1-4 For matters related to the potential use of your property during construction of the Project, please call SCE's Project Hotline at 1-866-785-7057.

C1-5 With regard to your comment on the widening of Leon Road, SCE has previously informed us that they have taken into consideration the ultimate build out of Leon Road (i.e., the land SCE proposes to occupy as the ROW of the proposed Project would become part of Leon Road's public ROW).

Alternatives to the proposed Project are discussed in EIR Section D. The alternatives considered, but eliminated are discussed in Appendix 4 (Alternatives Screening Report). A Partial Underground Alternative, which begins at Skyflower Drive and extends south approximately 0.65 miles, was considered in the EIR to reduce significant, unavoidable visual impacts that were identified in this area. Per CEQA Guidelines Section 15126.6(c), "the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." No significant effects that could not be mitigated were determined in the area of the identified property to necessitate consideration of an alternative to SCE's proposed project.

Comment Set C2 – Clyde Bacon

From: Clyde Bacon <skyguy.cjb@gmail.com>
Sent:Fri 2/19/2016 10:52 AM
To: Valley-South-Project

It is easy and often repeated "not in my backyard" (which it might be) but that adds nothing to the discussion. I looked for 6 months to find a development that offered not only house plans, amenities, pleasant views to suit my taste. Carefully I chose a lot in a community offering solar included and most importantly "underground utilities" backing onto Leon Road and raised 10 feet above the road with a 6 foot masonry wall I had privacy with a view. I felt confident enough in the builder and developers hardscape and visual presentation to commit my retirement comfort to building here. Leon is the main road passing thru the heart of Spencers Crossing complete with no above ground view impairments, full roadside landscaping, and blue skies. There are undeveloped areas that you can route thru and accomplish your goal without violating the promise we purchased. **C2-1**

My second point and strongest safety aspect is as follows: I was an instructor pilot in the Air Force and Air National Guard and followed up with a 28 year career as a Delta Airlines Pilot. How nice to sit on my back patio with "a cold one" and watch the parade of competent and a few struggling pilots do their thing. Runway 18 is the primary approach/landing direction at French Valley Airport due to prevailing wind direction. According to the disclosure documents I had to read an initial (to purchase my lot) A/C could be expected to overfly me at 363 to 600 feet above ground level. Sadly, but not without comic entertainment, for an old instructor as I evaluated talent levels I found a fair number of less than what we call "stabilized approaches". The fact that FV is a uncontrolled airport (meaning no control tower; to observe and direct) some pilots sight-see while in the landing pattern. Others have difficulty maintaining proper rates of descent while turning to final and the consistency of length and width of patterns often end up with A/C lower than they should be when crossing twice (outbound and inbound) the Leon/Pennycress area. As I am directly under the GPS Runway 18 radial approximately 1.2 miles from the touchdown end we experience much lower flyovers than we should. **C2-2**

All pilots know that nothing is more useless than "altitude above you" and we know "we should always plan for a way out of trouble". When airports are built and approach patterns are laid out "best intentions" are used. Development around airports takes careful planning, flight approach charts and Air Traffic Controllers (towers) when on site can provide guidance and warnings to aviators approaching hazards. Under visual rules every thing is up to the Pilot is it wise to put stuff into the mix that can go some place else.

Thank You

Clyde Bacon
30915 Moon Flower Lane
Murrieta CA 92563
603-731-5142

Responses to Comment Set C2

C2-1 Thank you for your comments. The EIR considers two alternatives to SCE's proposed Project, including an alternative that re-routes the subtransmission line alignment along Menifee Road (Alternative 1) to avoid the area of Leon Road where no aboveground utilities currently exist (with the exception of street lighting) and a partial underground alternative (Alternative 2), which would underground the 115-kV subtransmission line for approximately 0.65 miles south of Skyflower Drive. The EIR analysis determined that the CEQA Environmentally Superior Alternative would be Alternative 2 (Partial Underground Alternative). However, the EIR is not a decision document. The Commission will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

C2-2 Impacts related to aviation safety are discussed in EIR Section C.14 (Transportation and Traffic), under Impact TRA-3. The EIR concludes that aviation safety impacts would be less than significant with implementation of Mitigation Measure TRA-2 (Comply with FAA 7460-1 Determination Recommendations), which requires SCE to submit FAA Form 7460-1 (Notice of Proposed Construction or Alteration) to the Manager of the FAA Air Traffic Division for review and approval of the approved Project, and that SCE shall implement all recommended safety features or Project design changes.

As noted in the Project Description (Section B.3.1, page B-12), "SCE would submit FAA Form 7460-1 (Notice of Proposed Construction or Alteration) for those subtransmission and telecommunication structures ("structures") and wire spans exceeding the regulatory thresholds, in this case, primarily due to their proximity to French Valley Airport. Approximately 74 poles/towers are anticipated to require FAA notifications… Once SCE files the notification forms with the FAA, the FAA will conduct an aeronautical study to determine whether certain structures and wire spans in proximity to public airports would present a potential hazard to air navigation or could negatively impact the operational procedures of a nearby airport. Depending on the determination, the FAA may recommend no changes to the design of the proposed structures; or request redesigning the proposed structures to reduce the height; marking the structure, including the addition of aviation lighting; or placement of marker balls on wire spans (see Figure B-3, Example of Existing Marker Ball)."

Comment Set C3 – Kirk Douglas

Valley South Subtransmission Project
Draft EIR Comments
Aspen Environmental Group

I have read the Draft EIR, and would like to add my comments to the project. I am fully aware of the need for electricity delivered to where is needed, that is called progress. The current plan to for the Valley South Project is delivery electricity to another area for future growth. The project will do nothing to affect electricity delivery to my neighborhood. With that being said, I am not pleased with the prospect of 90 foot towers to carry electricity through my neighborhood, which has underground utilities, to another neighborhood. I do not want the views I enjoy destroyed by power lines that will not be bringing power to me. **C3-1**

Of the the three alternative choices noted in the Draft EIR. I would prefer the second alternative. This would allow the areas south of where I live power for the future and not destroy the views that are in the neighborhood now. Note that prior neighborhood being constructed, the power lines down Leon Rd were on poles. With the construction, the power lines were taken down with assumption that the lines going through neighborhood were placed underground. It makes no sense to now come back years later and place power poles down my portion of Leon Rd. that would be higher that original ones. **C3-2**

Of he other two proposals, alternative one will work, but will put lines in someones backyard. While it would keep lines out of my neighborhood, just think that another person like me may feel for his neighborhood the way I do for mine. Alternative three, maybe the best, but would limit growth in south part of county. **C3-3**

The preceding was written before I attended the information meeting on February 22, 2016. I choose to leave those comments as written and add the following based on info from meeting.

I was pleased to hear that the Alternative Two is the preferred choice as opposed to power lines down Leon Rd in my neighborhood. It was interesting that the underground choice in my neighborhood would not affect any Indian Resources and still allow the project to provide electricity in the south county area. **C3-4** One comment to be made is the where on map for Alternative Two will terminate the underground portion and rise to place lines on poles. The map indicates new pole will rise about 110 yards north of the current first pole going south. I would hope that the riser (when lines come from underground) be as close to current pole or further south. With the height of new pole, would prefer underground portion to end at old Leon Rd and Penny Cress Ln. This will somewhat mitigate the view of the height of the new poles as one walks or drives south on Leon Rd, prior to Leon turning to Right or southeast. **C3-5**

Thanks for the opportunity to make an input.

Kirk Douglas
35081 Lone Hill Ct.
Winchester CA 92596
951-223-3294

Responses to Comment Set C3

C3-1 Thank you for your comments. As described in EIR Section B.1 (Project Overview), the proposed Project is necessary to add capacity to serve long-term forecasted electrical demand requirements in the Electrical Needs Area, which SCE defines as portions of the cities of Menifee, Murrieta, Temecula, and unincorporated Riverside County, as well as to provide safe and reliable electrical service, and maintain or improve reliability and provide greater operational flexibility within the Electrical Needs Area.

C3-2 Your preference for Alternative 2 (Partial Underground Alternative) has been noted. It is understood that distribution level (12 to 33-kV lines) "power lines" are underground within the noted community; however, the California Public Utilities Commission (CPUC) has authority over regulated utilities, such as Southern California Edison and jurisdiction over subtransmission lines such as the Valley South Subtransmission Project. The EIR has identified a significant and unavoidable (Class I) impact along Leon Road where there currently are no above ground utilities (with the exception of street lighting). The CPUC will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the Project, including consideration of the alternatives evaluated in the EIR.

C3-3 As discussed in EIR Section D, Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) would meet the project objectives; however, it would only slightly reduce the aesthetic/visual impact by moving the lines to another location, but would result in additional potentially significant cultural resources impacts. Alternative 3 (No Project Alternative) would not meet the project objectives; under peak electrical demand conditions and abnormal system conditions (e.g., an outage on the existing subtransmission lines), the existing Valley-Auld or Valley-Sun City subtransmission lines are projected to exceed their maximum operating limit in 2016.

C3-4 As noted, Alternative 2 (Partial Underground Alternative) was determined to be the environmentally superior alternative. As discussed in EIR Section D.3.2 (page D-40), while Alternative 2 would involve fewer poles, impacts to cultural resources would be the same as the proposed Project as it would be within the same alignment (area of potential effect). Buried resources (prehistoric and historical archaeological sites) accidentally uncovered during ground-disturbing activities associated with Alternative 2 would be mitigated with implementation of Mitigation Measures CR-4 (Conduct Construction Monitoring) and CR-6 (Treat Previously Unidentified Cultural Resources). As noted in Table D-6 (Comparison of Alternatives), impacts to human remains would be similar to (not the same as) the proposed Project (Class I – significant and unavoidable).

C3-5 The Partial Underground Alternative was originally designed to terminate where the subtransmission line would transfer from new ROW to existing ROW. As noted by the commenter, the underground portion should extend to where the first existing overhead distribution pole is located within the existing ROW, which is approximately 300 feet farther south (0.05 mile), such that Alternative 2 would increase from 3,300 feet to 3,600 feet or 0.65 mile. The Final EIR has been revised to extend the underground portion to the location of the first pole within the existing ROW south of the new ROW area.

Extending the underground portion to Old Leon Road and Penny Cress Lane is not required under CEQA, as mitigation under CEQA is only required for significant impacts. As documented in the

EIR, the replacement of existing overhead distribution lines with overhead subtransmission lines does not cause a significant visual change from existing conditions in this area.

Comment Set C4 – Resident 1

02/23/2016

[redacted]

Home Owner : [redacted]

On February 22, 2016, I attended the commission's meeting regarding the Valley South Submission Project.

I support the primary Leon Road Route, along with the underground option proposed near the housing developments. **C4-1**

I strongly oppose the alternate route that brings the lines down Menifee Rd.

My family and I have lived on the corner of Lee Lane and Menifee Rd., in the house we built, for 16 years.

I am concerned that my house will be condemned by the power company or my property will be destroyed if the alternate route is selected. **C4-2**

My property has a large grove of state protected California Live Oak trees as well as an array of abundant wildlife that use my property as their habitat and refuge. Native plans and a variety of ecosystems are also located sporadically throughout my property.

I am also concerned about the potential Native American cultural areas that would be disturbed if the Menifee Rd. alternate is approved. **C4-3**

Thank you for the opportunity to share my comments to the commission.

Respectfully,
[redacted]

Responses to Comment Set C4

C4-1 Your preference for Alternative 2 (Partial Underground Alternative) and opposition to Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) have been noted.

C4-2 As shown in Project Description Table B-3, new right-of-way (ROW) for the subtransmission line would require a width of approximately 25 to 30 feet, or a width of up to 55 feet for existing/upgraded ROW.

Section D.3.1 (page D-14 to D-15) of the EIR discusses the potential impacts to biological resources for Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) and identifies measures such as providing compensation for permanent impacts to sensitive vegetation communities (Mitigation Measure BIO-3) and developing a Habitat Restoration and Monitoring Plan (Mitigation Measure BIO-4) to reduce these impacts. As stated, impacts from construction and operation of Alternative 1 to wildlife would be the same as for the proposed Project, and would require mitigation to reduce impacts. Similarly, and as documented in the EIR, construction activities under Alternative 1 would be identical to the proposed Project, with only a difference in the acreage of vegetation communities that would be affected.

C4-3 As discussed in Section D.3.1, Table D-6 (Comparison of Alternatives), Alternative 1 would result in similar cultural resources impacts as the proposed Project, as most resources can be avoided through implementation of mitigation measures (MM CR-1 through MM CR-13). Potential impacts to human remains would be similar to the proposed Project as buried human remains have been discovered within a mile of the proposed route, and an inadvertent discovery of human remains would result in a significant and unavoidable impact.

Comment Set C5 – Adam Jaramillo

From: Adam Jaramillo [mailto:ajaramillo12@roadrunner.com]
Sent: Wednesday, February 24, 2016 6:12 AM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Subject: SCE Valley South Transmission Project (Leon Road)

Greetings as with all new developments, bury the lines. Stop trying to take the easy way out. **C5-1**

Bury them.

Adam Jaramillo

Responses to Comment Set C5

C5-1 Your preference for burying the new subtransmission line has been noted.

Comment Set C6 – Barbara Stevens

From: Barbara Stevens [mailto:ybcuz2009@gmail.com]
Sent: Wednesday, February 24, 2016 3:28 PM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Subject: Draft EIR Comment from Homeowner at Spencer's Crossing

To Whom It May Concern-
I am responding to voice my concerns as a homeowner in Spencer's Crossing of the high voltage 115 kV Tranmission Poles that are being proposed in the middle of our greenbelt pathway on Leon Road that would bisect into Spencer's Crossing. We purchased our home 3 years ago from D.R. Horton and was not provided any information of the SCE Valley South Transmission Project that could effect our property values or put us in a position of needing to disclose this project, should we decide to sell our home and because of this project possibility effecting our property values, we might not be able to sell our home.

C6-1

Right now our taxes are sky high with the special tax for Clinton Keith Road Project, which makes living in Spencer's Crossing more expensive than other local associations and if this project goes down Leon that will be another "huge" deterrent for anyone to want to buy a home in Spencer's Crossing. There is vacant land off Winchester and Menifee Road that would not effect property values for homeowners.

It is my understanding there are three alternatives presented at the 2/22/16 meeting and I would like to voice my opinion. My first choice would be to not go through with this project. My 2nd choice would be to use Menifee Road Route, and my last choice would be to bury the lines underground for .6 miles on Leon Road.

Thank you!

--

Barbara Stevens

35027 Indian Grass Drive

Murrieta CA 92563

949-678-4544

ybcuz2009@gmail.com

Responses to Comment Set C6

C6-1 Your opposition to the proposed Project has been noted, as well as your preference for Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) and lastly Alternative 2 (Partial Underground Alternative), if the Project is approved.

Comment Set C7 – Matt Gordon

From: Matt Gordon [mailto:gogogordy1@gmail.com]
Sent: Tuesday, February 23, 2016 9:06 PM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Subject: Proposed Valley South Subtransmission Project

I want to express my concern regarding the proposed Valley South Subtransmission Project, specifically in reference to the possible addition of power transmission towers and 115kv lines along a specific portion of Leon Road, where there presently are NO power towers, overhead power lines or overhead utilities.

The portion I am referring to extends roughly from Leon Road @ Pennycress, north to Leon Road @ Skyflower.

Presently this stretch is embellished with a popular broad greenbelt/walking path on the eastern side of Leon Road, which has the added benefit of providing hunting ground for several local, resident-to-the-area hawks, eagles, bats and owls who live within and fly along this venue for their prey on a daily (nightly) basis.

Besides acting as a natural form of pest elimination for many nearby residences, these birds of prey and bats provide a daily reminder to young and old alike of the beauty of the nature and are a welcome reminder of the rural origin and history of this particular portion of Riverside County.

C7-1

Unfortunately it's certain that the erection of the proposed power towers complete with live high-tension lines strung along the "airspace" above this greenbelt would hinder their ability to fly and echo-navigate in concert with these dangerous obstacles, and would certainly force these animals to try to find new food source locations elsewhere, or perish?

In a nutshell it would prove to be a material, and un-beneficial change to the environment these animals are accustomed to living within, and they deserve our consideration in the matter.

I strongly urge the Commission to deny application to extend overhead power transmission infrastructure along the subject stretch of Leon Road out of consideration for a small but vital wildlife population/ecosystem, or at the very least approve only Alternative #2: a proposed 0.6 mile stretch of UNDERGROUND transmission service which would leave the flyway above this greenbelt unencumbered with flight obstacles and environmental challenges to the wildlife.

C7-2

Additionally and on a separate note; by virtue of the fact that notices pertaining to the application of, and progress/processes of this and other projects like it are only sent to those within 300 feet of same, seems like a blatant attempt at "back-dooring" these into our communities. I realize that this is a regulatory issue and not specific to the Valley South Subtran. Project at hand, but it doesnt add to any element of "transparency" of process nonetheless.

C7-3

Thank you for reading my comment and for your consideration.

Best regards,
Matt Gordon
30881 Prairie Sun Way
Murrieta, Ca. 92563
951-768-4809
gogogordy1@gmail.com

Responses to Comment Set C7

C7-1 Your opposition to the proposed Project, specifically in the area along Leon Road between Skyflower Drive and Pennycress, has been noted.

With respect to biological resources, EIR Section C.5 (Biological Resources) assesses and discloses the impacts of the proposed Project, including loss of foraging habitat for wildlife (Impact BIO-2), disturbance to nesting birds and raptors (Impact BIO-3), mortality or loss of habitat for special-status bat species (Impact BIO-15), and injury or mortality of burrowing owl (Impact BIO-18), among others.

For clarification, the proposed Project (Segment 1) would include the construction of a new 115-kV subtransmission line, which involves installation of wood poles and light weight steel poles, and then stringing the poles with 115-kV conductor. Existing distribution poles and power lines located along much of the alignment would generally be removed and the power lines transferred onto the new subtransmission poles, which would be taller than the existing distribution poles.

C7-2 Your opposition to the proposed Project has been noted, as well as your preference for Alternative 2 (Partial Underground Alternative).

C7-3 Under California Environmental Quality Act (CEQA) Guidelines Section 15087(a), Public Review of Draft EIR, the lead agency (California Public Utilities Commission) must provide notice of the availability of the Draft EIR to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and by at least one of the following procedures: (1) publication at least one time in a newspaper of general circulation in the area affected by the proposed project or in the newspaper of largest circulation from among the newspapers of general circulation (if more than one area), (2) posting on and off the site in the area where the project would be located, *or* (3) direct mailing to the owners and occupants of property contiguous to the parcels on which the project would be located based on the latest equalized assessment roll. Additionally, under CEQA Guidelines Section 15087(d), the Notice of Availability (NOA) shall also be posted in the office of the county clerk of each county in which the project is located.

A NOA letter for the Draft EIR was mailed to over 130 interested parties (CEQA Guidelines §15087(a)), which included individuals who had previously commented on the Project during the scoping period (May 5, 2015 to June 8, 2015), and a NOA postcard was mailed to over 625 residences located within 300 feet of the proposed and alternative alignments (CEQA Guidelines §15087(a)(3)). Additionally, newspaper notices were placed in The Press-Enterprise on January 30, 2016 and February 12, 2016, in The Californian (An Edition of the UT San Diego) on February 12, 2016, and The Anza Valley Outlook on February 19, 2016 (CEQA Guidelines §15087(a)(1)). The newspaper notices included information on the proposed Project, where to obtain information on the Draft EIR, and details regarding the public meeting. As such, the notification for the Valley South Subtransmission Project meets and exceeds the regulatory requirements under CEQA.

Furthermore, all those who signed-in during the public meeting held on February 22, 2016 and those who submitted comments on the Draft EIR have been added to the Project mailing list to receive all future CEQA-related Project communications.

Southern California Edison (SCE) also conducted public outreach. As stated in the Proponent's Environmental Assessment (Section 1.7, Public Outreach), SCE mailed a project information pamphlet (project newsletter) in November 2012 to property owners located within 300 feet of

the proposed Project, which explained that SCE was preparing an application for the Project and intended to submit it to the CPUC in late Spring 2013. SCE conducted a public open house session in December 2012 in the City of Menifee. In September 2014, SCE mailed an updated project newsletter to property owners within 600 feet of the project (beyond the standard 300 feet). In November 2014, prior to filing the Project application with the CPUC, SCE conducted another public information session in Murrieta. The purpose of the information session was to inform the community about the Project and provide an opportunity for them to ask questions. SCE also conducted briefings with key stakeholders, including representatives from the CPUC, Riverside County, City of Menifee, City of Murrieta, City of Temecula (primarily between 2011 and 2014), local tribes (Band of Cahuilla Indians, Pechanga Band of Luiseno Indians, Soboba Band of Luiseno Indians), developers, and school districts.

Comment Set C8 – Madelyn Berson

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: February 22, 2016 **Please Print**

Name*: Madelyn F. Berson

Affiliation (*if any*):* resident of Spencer's Crossing

Address:* 35889 Wolverine Lane

City, State, Zip Code:* Murrieta, Ca. 92563

Telephone Number:* 619-980-9918 **Email:*** madelyn.berson@gmail.com

Comment: I am very concerned and opposed to high power lines being constructed through Spencer's Crossing. When I purchased my home in Spencer's in 2007, I was drawn to the beauty, safety and quaintness of the neighborhood. Building ugly poles to go through it takes away those three things, not to mention our property values would go down. We have all suffered though the financial crisis of the economic downturn and are just now seeing the light of day with our home values. Spencer's Crossing is a family neighborhood and I worry about the safety of the children living near aerial high piower lines. Let's not make this another Flint Michigan where the safety of children is compromised so the power company can save money by not putting cables underground.
Thank you

C8-1

C8-2

Madelyn F. Berson

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C8

C8-1 Your opposition to the proposed Project, specifically in the area of the Spencer's Crossing development has been noted. As discussed in the EIR, the proposed Project would result in long-term changes in the landscape that degrade the existing visual character or quality (Impact AES-6).

C8-2 The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

The proposed 115-kV subtransmission line would be designed and constructed per industry design standards, including but not limited to the California Public Utilities Commission General Order 95 (GO-95), "Rules for Overhead Electrical Line Construction"; CPUC GO-52, "Construction and Operation of Power and Communication Lines"; CPUC GO-131-D, "Rules for Planning and Construction of Electric Generation Line and Substation Facilities in California"; Title 8 California Code of Regulations (CCR), Section 2700 et seq. "High Voltage Electric Safety Orders", and Title 14 CCR Section 1250-1258, "Fire Prevention Standards for Electric Utilities", as applicable.

The EIR considers a partial underground alternative (Alternative 2), which would underground the 115-kV subtransmission line for approximately 0.65 miles south of Skyflower Drive. The EIR analysis determined that the CEQA Environmentally Superior Alternative would be Alternative 2 (Partial Underground Alternative). However, the EIR is not a decision document. The Commission will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

Comment Set C9 – Dan Long

From: Dan Long [mailto:dlong@rancongroup.com]
Sent: Tuesday, February 23, 2016 5:22 PM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Cc: 'Chuck Glass' <chuck.glass@pangaealandconsultants.com>; Dan Long <dlong@rancongroup.com>
Subject: Valley South SubTransmission Project EIR Comments

To whom it may concern,
This email shall provide comments to the Draft EIR for the Valley-South-Subtransmission Project.
Attached is Tentative Tract Map 36467 currently in process and being scheduled for approval by the County of Riverside.
We have designed and aligned the Leon Rd corridor as required by the County of Riverside General Plan circulation element. **C9-1**
The proposed Valley-South Subtransmission line should be consistent with the ROW of the new Leon Rd ROW as per the General Plan circulation element. The current alignment of 2 of the 3 existing utility easements pass through culturally sensitive areas and should be avoided. The new Valley-South Subtransmission lines and easements should follow the Leon Rd alignment and ROW in order to reduce impacts to residence of Tract 36467 an eliminate the negative impacts to cultural resources.

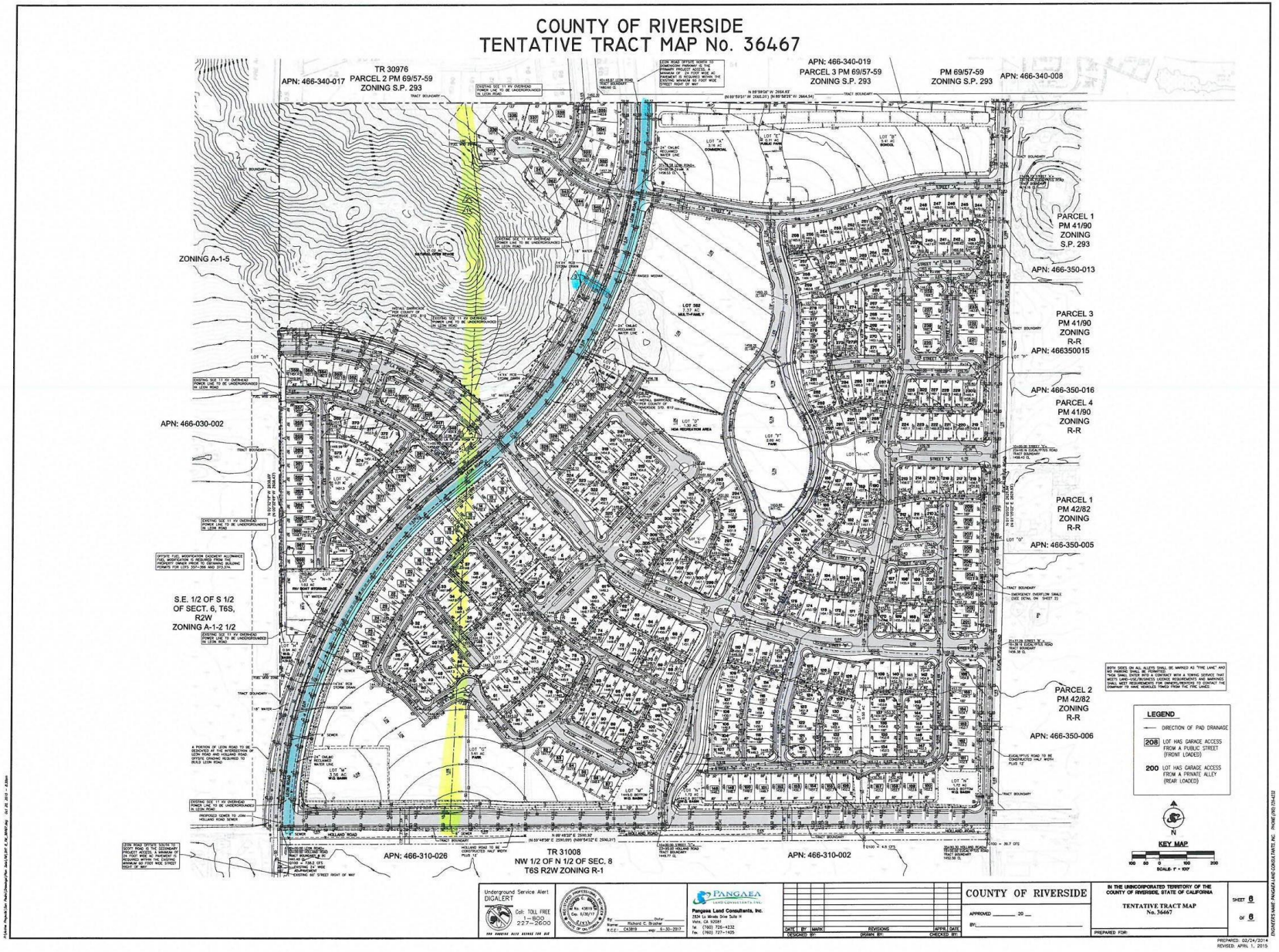
Please ensure these comments are included into the formal comments and that a response is provided. If the proposed Valley-South Subtransmission line is not revised to follow the new alignment of Leon Rd. it will negatively impact cultural resources and require the redesign of an approved tract map and/or possible relocation and abandonment of residential dwelling units depending on the timing. BY relocating the Valley-South Subtransmission line to be consistent with the new Leon Rd alignment, these negative impacts will be avoided. **C9-2**

I am available at anytime if you have any questions.

Regards,

Danny Long
Deputy Director of Development

THE RANCON GROUP
41391 Kalmia Street, Ste 200
Murrieta, Ca 92562
Direct Line: 951-200-2367
dlong@rancongroup.com
www.rancongroup.com


COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP No. 36467
TR 30976
APN: 466-340-017 PARCEL 2 PM 69/57-59
ZONING S.P. 293
APN: 466-340-019
PARCEL 3 PM 69/57-59
ZONING S.P. 293
PM 69/57-59
ZONING S.P. 293
APN: 466-340-008
PARCEL 1
PM 41/90
ZONING
S.P. 293
APN: 466-350-013
PARCEL 3
PM 41/90
ZONING
R-R
APN: 466350015
APN: 466-350-016
PARCEL 4
PM 41/90
ZONING
R-R
PARCEL 1
PM 42/82
ZONING
R-R
APN: 466-350-005
PARCEL 2
PM 42/82
ZONING
R-R
APN: 466-350-006
ZONING A-1-5
APN: 466-030-002
S.E. 1/2 OF S 1/2
OF SECT. 6, T6S,
R2W
ZONING A-1-2 1/2
APN: 466-310-026
TR 31008
NW 1/2 OF N 1/2 OF SEC. 8
T6S R2W ZONING R-1
APN: 466-310-002
LEGEND
DIRECTION OF PAD DRAINAGE
208 LOT HAS GARAGE ACCESS FROM A PUBLIC STREET (FRONT LOADED)
200 LOT HAS GARAGE ACCESS FROM A PRIVATE ALLEY (REAR LOADED)
KEY MAP
COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP
No. 36467
PANGAEA
Pangaea Land Consultants, Inc.

SHEET INDEX:

1. TITLE SHEET AND NOTES
2. TYPICAL STREET SECTIONS
3. TYPICAL STREET SECTIONS
4. TYPICAL DETAILS
5. LOT AREA SUMMARY
6. TENTATIVE MAP

PRELIMINARY EARTHWORK QUANTITIES:

CUT:	300,000 CY
FILL:	300,000 CY
IMPORT/EXPORT:	0 CY

EASEMENT NOTES

1. AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSE IN FAVOR OF CALIFORNIA ELECTRIC POWER COMPANY RECORDED APRIL 17, 1951 AS INST. NO. 16431, BOOK 1263, PAGE 16, O.R. RIV. CO.
2. AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES IN FAVOR OF CALIFORNIA ELECTRIC POWER COMPANY RECORDED APRIL 14, 1953 AS INST. NO. 18017, BOOK 1451, PAGE 424, O.R. RIV. CO.
3. AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES IN FAVOR OF EASTERN MUNICIPAL WATER DISTRICT RECORDED JULY 9, 1992 AS INST. NO. 253295, O.R. RIV. CO.

REVISIONS	APPR.	DATE

COUNTY OF RIVERSIDE

APPROVED _____ 20 __

BY: _____

IN THE UNINCORPORATED TERRITORY OF THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

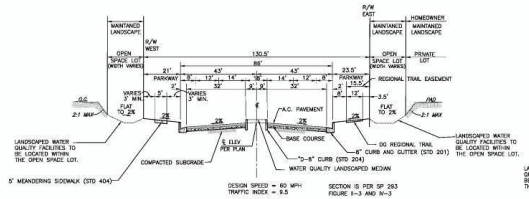
TENTATIVE TRACT MAP
No. 36467

PREPARED FOR:

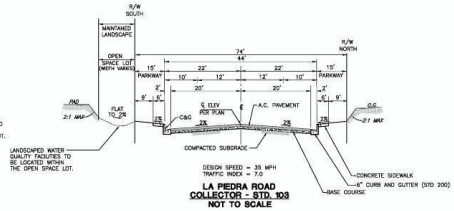
SHEET 1 OF 6

ENGINEER'S NAME: PANGAEA LAND CONSULTANTS, INC. PHONE (760) 726-4232

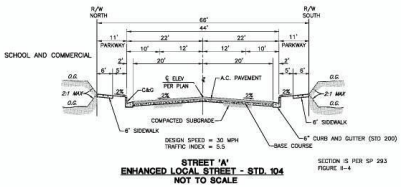
COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP No. 36467



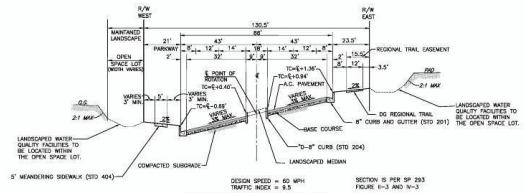
LEON ROAD
MODIFIED ARTERIAL HIGHWAY - STD 92 (MODIFIED FOR TRAIL)
NOT TO SCALE



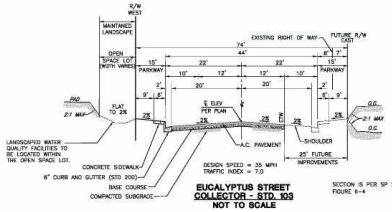
LA PIEDRA ROAD
COLLECTOR - STD. 103
NOT TO SCALE



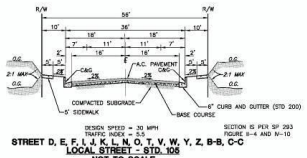
STREET 'A'
ENHANCED LOCAL STREET - STD. 104
NOT TO SCALE



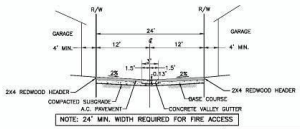
LEON ROAD (SUPER ELEVATION)
MODIFIED ARTERIAL HIGHWAY - STD 92 (MODIFIED FOR REGIONAL TRAIL AND SUPER ELEVATION)
NOT TO SCALE



EUCALYPTUS STREET
COLLECTOR - STD. 103
NOT TO SCALE

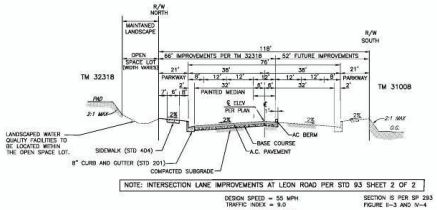


STREET D, E, F, I, J, K, L, N, O, T, V, W, Y, Z, B-B, C-C
LOCAL STREET - STD. 105
NOT TO SCALE

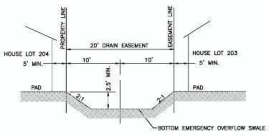


ALLEY (PRIVATE) - STD. 500
NOT TO SCALE

BOTH SIDES ON ALL ALLEYS SHALL BE MARKED AS "FIRE LANE" AND NO PARKING SHALL BE PERMITTED.
*HOA SHALL ENTER INTO A CONTRACT WITH A TOWING SERVICE THAT MEETS LAND-USE/BUSINESS LICENSE REQUIREMENTS AND MARKINGS SHALL MEET REQUIREMENTS FOR OWNERS/RENTERS TO CONTACT THE COMPANY TO HAVE VEHICLES TOWED FROM THE FIRE LANES.



HOLLAND ROAD
MAJOR HIGHWAY - STD 93
NOT TO SCALE



TYPICAL EMERGENCY OVERFLOW SWALE
NOT TO SCALE

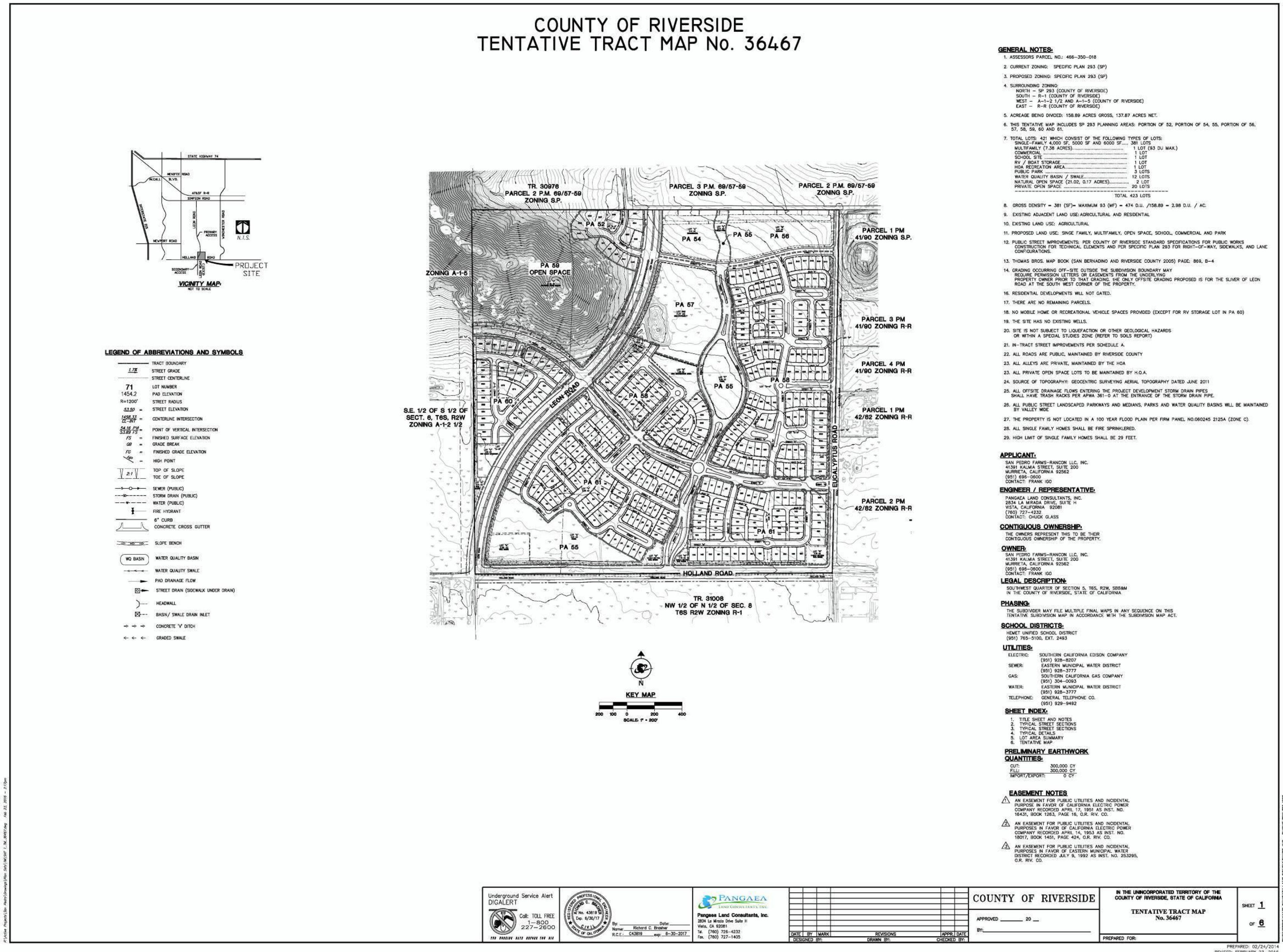
Underground Service Alert DIGALERT Call: TOLL FREE 1-800 227-2600

PANGAEA LAND CONSULTANTS, INC.
Pangaea Land Consultants, Inc.
2534 La Mesa Drive Suite H
Vista, CA 92081
Tel. (760) 726-4232
Fax. (760) 727-1405

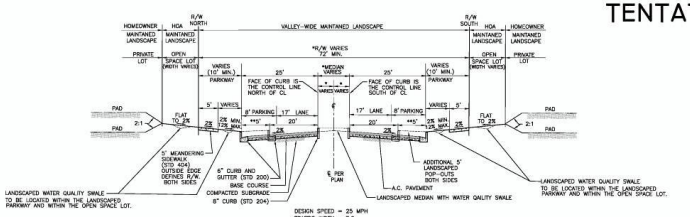
COUNTY OF RIVERSIDE
APPROVED _____ 20__
BY: _____
DATE | BY | MARK | REVISIONS | APPR. DATE
DESIGNED BY | DRAWN BY | CHECKED BY

IN THE UNINCORPORATED TERRITORY OF THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA
TENTATIVE TRACT MAP No. 36467
PREPARED FOR:
SHEET 2 OF 8

PREPARED: 02/24/2014
REVISED: FEBRUARY 23, 2016


COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP No. 36467
GENERAL NOTES:
1. ASSESSORS PARCEL NO.: 466-350-018
2. CURRENT ZONING: SPECIFIC PLAN 293 (SP)
3. PROPOSED ZONING: SPECIFIC PLAN 293 (SP)
4. SURROUNDING ZONING: NORTH – SP 293 (COUNTY OF RIVERSIDE) SOUTH – R-1 (COUNTY OF RIVERSIDE) WEST – A-1-2 1/2 AND A-1-5 (COUNTY OF RIVERSIDE) EAST – R-R (COUNTY OF RIVERSIDE)
5. ACREAGE BEING DIVIDED: 158.89 ACRES GROSS, 137.87 ACRES NET.
6. THIS TENTATIVE MAP INCLUDES SP 293 PLANNING AREAS: PORTION OF 52, PORTION OF 54, 55, PORTION OF 56, 57, 58, 59, 60 AND 61.
7. TOTAL LOTS: 421 WHICH CONSIST OF THE FOLLOWING TYPES OF LOTS:
SINGLE-FAMILY 4,000 SF, 5000 SF AND 6000 SF..... 381 LOTS
MULTIFAMILY (7.38 ACRES)........ 1 LOT (93 DU MAX.)
COMMERCIAL .... 1 LOT
SCHOOL SITE .... 1 LOT
RV / BOAT STORAGE........ 1 LOT
HOA RECREATION AREA........ 1 LOT
PUBLIC PARK .... 3 LOTS
WATER QUALITY BASIN / SWALE........ 12 LOTS
NATURAL OPEN SPACE (21.02, 0.17 ACRES)........ 2 LOT
PRIVATE OPEN SPACE .... 20 LOTS
TOTAL 423 LOTS
8. GROSS DENSITY = 381 (SF)= MAXIMUM 93 (MF) = 474 D.U. /158.89 = 2.98 D.U. / AC.
9. EXISTING ADJACENT LAND USE: AGRICULTURAL AND RESIDENTIAL
10. EXISTING LAND USE: AGRICULTURAL
11. PROPOSED LAND USE: SINGE FAMILY, MULTIFAMILY, OPEN SPACE, SCHOOL, COMMERCIAL AND PARK
12. PUBLIC STREET IMPROVEMENTS: PER COUNTY OF RIVERSIDE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION FOR TECHNICAL ELEMENTS AND PER SPECIFIC PLAN 293 FOR RIGHT-OF-WAY, SIDEWALKS, AND LANE CONFIGURATIONS.
13. THOMAS BROS. MAP BOOK (SAN BERNADINO AND RIVERSIDE COUNTY 2005) PAGE: 869, B-4
14. GRADING OCCURRING OFF-SITE OUTSIDE THE SUBDIVISION BOUNDARY MAY REQUIRE PERMISSION LETTERS OR EASEMENTS FROM THE UNDERLYING PROPERTY OWNER PRIOR TO THAT GRADING. tHE ONLY OFFSITE GRADING PROPOSED IS FOR THE SLIVER OF LEON ROAD AT THE SOUTH WEST CORNER OF THE PROPERTY.
16. RESIDENTIAL DEVELOPMENTS WILL NOT GATED.
17. THERE ARE NO REMAINING PARCELS.
18. NO MOBILE HOME OR RECREATIONAL VEHICLE SPACES PROVIDED (EXCEPT FOR RV STORAGE LOT IN PA 60)
19. THE SITE HAS NO EXISTING WELLS.
20. SITE IS NOT SUBJECT TO LIQUEFACTION OR OTHER GEOLOGICAL HAZARDS OR WITHIN A SPECIAL STUDIES ZONE (REFER TO SOILS REPORT)
21. IN-TRACT STREET IMPROVEMENTS PER SCHEDULE A.
22. ALL ROADS ARE PUBLIC, MAINTAINED BY RIVERSIDE COUNTY
23. ALL ALLEYS ARE PRIVATE, MAINTAINED BY THE HOA
23. ALL PRIVATE OPEN SPACE LOTS TO BE MAINTAINED BY H.O.A.
24. SOURCE OF TOPOGRAPHY: GEOCENTRIC SURVEYING AERIAL TOPOGRAPHY DATED JUNE 2011
25. ALL OFFSITE DRAINAGE FLOWS ENTERING THE PROJECT DEVELOPMENT STORM DRAIN PIPES SHALL HAVE TRASH RACKS PER APWA 361-0 AT THE ENTRANCE OF THE STORM DRAIN PIPE.
26. ALL PUBLIC STREET LANDSCAPED PARKWAYS AND MEDIANS, PARKS AND WATER QUALITY BASINS WILL BE MAINTAINED BY VALLEY WIDE
27. THE PROPERTY IS NOT LOCATED IN A 100 YEAR FLOOD PLAIN PER FIRM PANEL NO.060245 2125A (ZONE C).
28. ALL SINGLE FAMILY HOMES SHALL BE FIRE SPRINKLERED.
29. HIGH LIMIT OF SINGLE FAMILY HOMES SHALL BE 29 FEET.
APPLICANT:
SAN PEDRO FARMS-RANCON LLC, INC. 41391 KALMIA STREET, SUITE 200 MURRIETA, CALIFORNIA 92562 (951) 696-0600 CONTACT: FRANK IGO
ENGINEER / REPRESENTATIVE:
PANGAEA LAND CONSULTANTS, INC. 2834 LA MIRADA DRIVE, SUITE H VISTA, CALIFORNIA 92081 (760) 727-4232 CONTACT: CHUCK GLASS
CONTIGUOUS OWNERSHIP:
THE OWNERS REPRESENT THIS TO BE THEIR CONTIGUOUS OWNERSHIP OF THE PROPERTY.
OWNER:
SAN PEDRO FARMS-RANCON LLC, INC. 41391 KALMIA STREET, SUITE 200 MURRIETA, CALIFORNIA 92562 (951) 696-0600 CONTACT: FRANK IGO
LEGAL DESCRIPTION:
SOUTHWEST QUARTER OF SECTION 5, T6S, R2W, SBB&M IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA
PHASING:
THE SUBDIVIDER MAY FILE MULTIPLE FINAL MAPS IN ANY SEQUENCE ON THIS TENTATIVE SUBDIVISION MAP IN ACCORDANCE WITH THE SUBDIVISION MAP ACT.
SCHOOL DISTRICTS:
HEMET UNIFIED SCHOOL DISTRICT (951) 765-5100, EXT. 2493
UTILITIES:
ELECTRIC: SOUTHERN CALIFORNIA EDISON COMPANY (951) 928-8207
SEWER: EASTERN MUNICIPAL WATER DISTRICT (951) 928-3777
GAS: SOUTHERN CALIFORNIA GAS COMPANY (951) 304-0093
WATER: EASTERN MUNICIPAL WATER DISTRICT (951) 928-3777
TELEPHONE: GENERAL TELEPHONE CO. (951) 929-9492
SHEET INDEX:
1. TITLE SHEET AND NOTES
2. TYPICAL STREET SECTIONS
3. TYPICAL STREET SECTIONS
4. TYPICAL DETAILS
5. LOT AREA SUMMARY
6. TENTATIVE MAP
PRELIMINARY EARTHWORK QUANTITIES:
CUT: 300,000 CY
FILL: 300,000 CY
IMPORT/EXPORT: 0 CY
EASEMENT NOTES
1 AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSE IN FAVOR OF CALIFORNIA ELECTRIC POWER COMPANY RECORDED APRIL 17, 1951 AS INST. NO. 16431, BOOK 1263, PAGE 16, O.R. RIV. CO.
2 AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES IN FAVOR OF CALIFORNIA ELECTRIC POWER COMPANY RECORDED APRIL 14, 1953 AS INST. NO. 18017, BOOK 1451, PAGE 424, O.R. RIV. CO.
3 AN EASEMENT FOR PUBLIC UTILITIES AND INCIDENTAL PURPOSES IN FAVOR OF EASTERN MUNICIPAL WATER DISTRICT RECORDED JULY 9, 1992 AS INST. NO. 253295, O.R. RIV. CO.
VICINITY MAP
PROJECT SITE
LEGEND OF ABBREVIATIONS AND SYMBOLS
KEY MAP
SCALE: 1" = 200'
HOLLAND ROAD
LEON ROAD
EUCALYPTUS ROAD
PA 59 OPEN SPACE
TR. 31008 NW 1/2 OF N 1/2 OF SEC. 8 T6S R2W ZONING R-1
COUNTY OF RIVERSIDE
IN THE UNINCORPORATED TERRITORY OF THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA
TENTATIVE TRACT MAP No. 36467
SHEET 1 OF 6
PREPARED: 02/24/2014
REVISED: FEBRUARY 23, 2016

COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP No. 36467



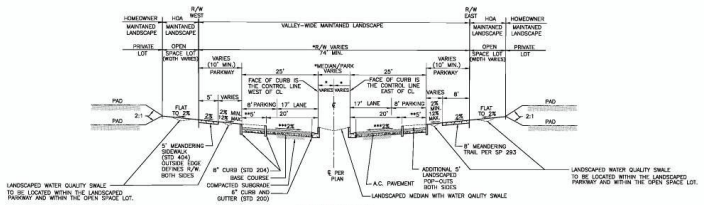
DESIGN SPEED = 25 MPH
TRAFFIC INDEX = 7.0

* MEDIAN WIDTH VARIES FROM 12' TO 40' (PER PLAN).
** INDICATES 5' LANDSCAPED POP-OUT (PER PLAN).
SEE DETAIL THIS SHEET FOR TYPICAL LANDSCAPED POP-OUT.

NOTE: STREET 'B' MEANDERING SIDEWALK AND DELINEATION OF LANDSCAPE MAINTENANCE

THE OUTSIDE EDGE OF THE MEANDERING SIDEWALKS DEFINE THE RIGHTS-OF-WAY AND LIMITS OF LANDSCAPE MAINTENANCE BY VALLEY-WIDE. AN OPEN SPACE LOT MAY LIE BETWEEN RIGHT-OF-WAY AND THE FRONTS OR SIDES OF PRIVATE LOTS. LANDSCAPE MAINTENANCE OF THESE OPEN SPACE LOTS SHALL BE THE RESPONSIBILITY OF THE HOMEOWNERS ASSOCIATION. WATER QUALITY FACILITIES MAY BE LOCATED IN EITHER THE PARKWAY PORTION OF THE RIGHT-OF-WAY OR IN THE OPEN SPACE LOTS.

STREET 'B'
COLLECTOR - STD. 103 (MODIFIED STREET SLOPE, PARKING POP-OUT & ADDED MEDIAN)
NOT TO SCALE



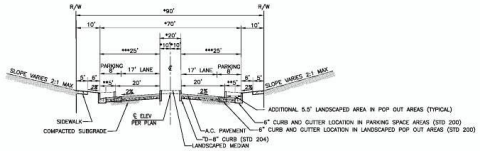
DESIGN SPEED = 25 MPH
TRAFFIC INDEX = 7.0

* WIDTH VARIES FROM 14' (MEDIAN) TO 300' (PARK), AS NOTED ON PLAN.
** INDICATES LANDSCAPED 5' POP-OUT (PER PLAN).
SEE DETAIL BELOW FOR TYPICAL PARKING AREA LANDSCAPE POP-OUT.
*** SHEET SECTION TO SLOPE TOWARD THE CENTERLINE/MEDIAN.

NOTE: STREET 'C' MEANDERING SIDEWALK & TRAIL AND DELINEATION OF LANDSCAPE MAINTENANCE

THE OUTSIDE EDGE OF THE MEANDERING SIDEWALKS DEFINE THE RIGHTS-OF-WAY AND LIMITS OF LANDSCAPE MAINTENANCE BY VALLEY-WIDE. AN OPEN SPACE LOT MAY LIE BETWEEN RIGHT-OF-WAY AND THE FRONTS OR SIDES OF PRIVATE LOTS. LANDSCAPE MAINTENANCE OF THESE OPEN SPACE LOTS SHALL BE THE RESPONSIBILITY OF THE HOMEOWNERS ASSOCIATION. WATER QUALITY FACILITIES MAY BE LOCATED IN EITHER THE PARKWAY PORTION OF THE RIGHT-OF-WAY OR IN THE OPEN SPACE LOTS.

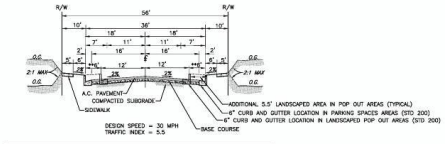
STREET 'C'
COLLECTOR - STD. 103 (MODIFIED STREET SLOPE PARKING POP-OUT, PASEO TRAIL & ADDED A MEDIAN)
NOT TO SCALE



* MEDIAN WIDTH VARY FROM 20' WIDE MINIMUM UP TO 40' WIDE (SEE PLAN) PARKWAY AND TRAVEL LANES WIDTHS ARE PER STANDARD 105
** INDICATES LANDSCAPED PARKING AREA 5' CURB POP OUT (SEE PLAN FOR LOCATIONS)
SEE DETAIL THIS SHEET FOR LANDSCAPE AREA POP OUT TYPICAL SECTION
*** INCREASED PAVEMENT WIDTH FROM CURB TO MEDIAN TO 20' WIDE

DESIGN SPEED = 30 MPH
TRAFFIC INDEX = 5.5

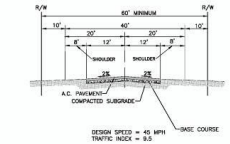
STREET G, H, M, P, R, S, U, X AND A-A
LOCAL STREET - STD. 105 (MODIFIED PARKING AREA CURB POP-OUT & ADDED A MEDIAN)



DESIGN SPEED = 30 MPH
TRAFFIC INDEX = 5.5

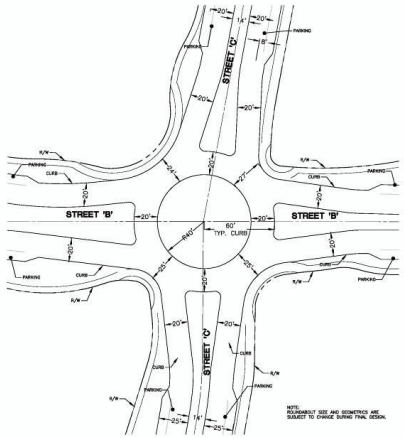
** INDICATES LANDSCAPED PARKING AREA 6" CURB POP OUT (SEE PLAN FOR LOCATIONS)
SEE DETAIL BELOW FOR TYPICAL PARKING AREA LANDSCAPE POP OUT

LOCAL STREET - STD. 105 (MODIFIED - PARKING CURB POP-OUT)
NOT TO SCALE

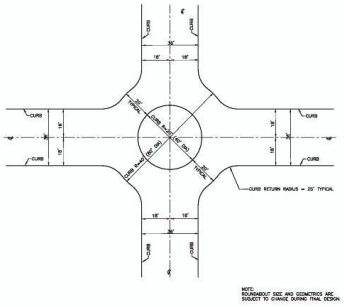


DESIGN SPEED = 40 MPH
TRAFFIC INDEX = 8.5

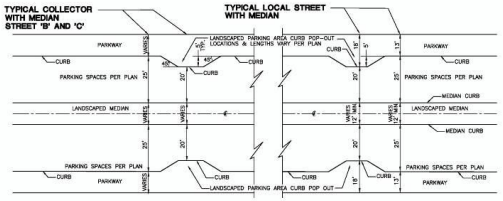
LEON ROAD OFFSITE - PRIMARY AND SECONDARY ACCESS
NOT TO SCALE



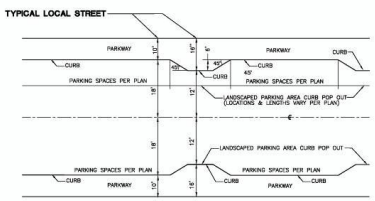
ROUNDABOUT AT THE INTERSECTION OF 'B' STREET AND 'C' STREET
NOT TO SCALE



ROUNDABOUT AT THE INTERSECTION OF LOCAL STREETS (SEE PLAN FOR LOCATIONS)
NOT TO SCALE



DETAIL - COLLECTOR WITH MEDIAN AND LOCAL STREET WITH MEDIAN PARKING AREA CURB POP-OUT)
NOT TO SCALE



DETAIL - LOCAL STREET WITH NO MEDIAN PARKING AREA CURB POP-OUT
NOT TO SCALE

Underground Service Alert DIGALERT Call: TOLL FREE 1-800 227-2600

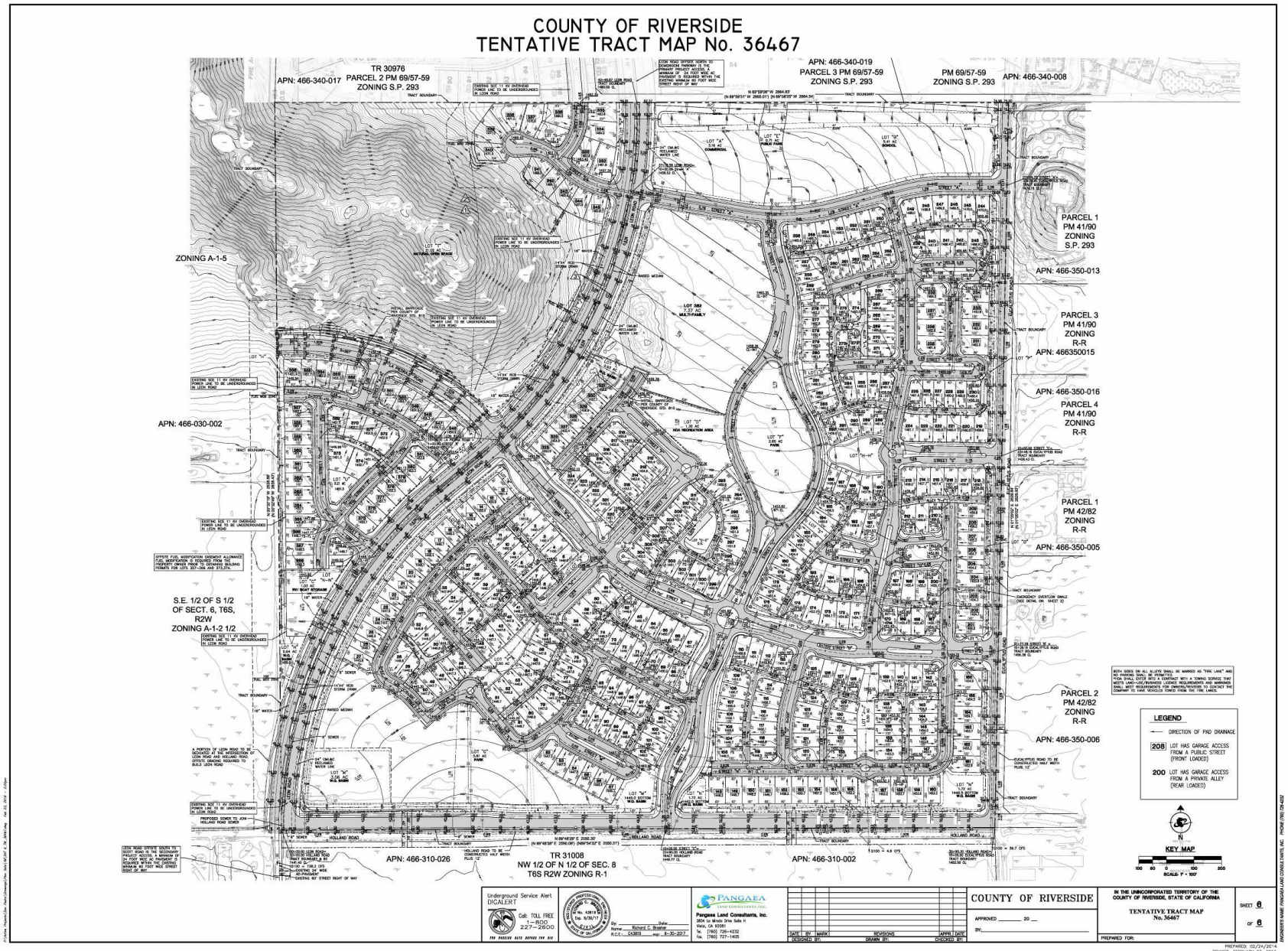
PANGAEA LAND CONSULTANTS, INC.
Pangaea Land Consultants, Inc.
3836 La Mirada Drive Suite H
Vista, CA 92081
Tel. (760) 705-4232
Fax. (760) 727-1405

COUNTY OF RIVERSIDE
APPROVED _____ 20 __
BY: _____

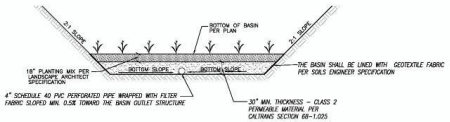
IN THE UNINCORPORATED TERRITORY OF THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA
TENTATIVE TRACT MAP No. 36467
PREPARED FOR:

SHEET 9 OF 8

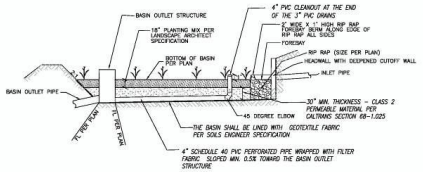
PREPARED: 02/24/2014
REVISED: FEBRUARY 23, 2016


COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP No. 36467
TR 30976
APN: 466-340-017 PARCEL 2 PM 69/57-59
ZONING S.P. 293
APN: 466-340-019
PARCEL 3 PM 69/57-59
ZONING S.P. 293
PM 69/57-59
ZONING S.P. 293
APN: 466-340-008
ZONING A-1-5
APN: 466-030-002
S.E. 1/2 OF S 1/2
OF SECT. 6, T6S,
R2W
ZONING A-1-2 1/2
PARCEL 1
PM 41/90
ZONING
S.P. 293
APN: 466-350-013
PARCEL 3
PM 41/90
ZONING
R-R
APN: 466350015
APN: 466-350-016
PARCEL 4
PM 41/90
ZONING
R-R
PARCEL 1
PM 42/82
ZONING
R-R
APN: 466-350-005
PARCEL 2
PM 42/82
ZONING
R-R
APN: 466-350-006
APN: 466-310-026
TR 31008
NW 1/2 OF N 1/2 OF SEC. 8
T6S R2W ZONING R-1
APN: 466-310-002
HOLLAND ROAD
LEGEND
DIRECTION OF PAD DRAINAGE
208 LOT HAS GARAGE ACCESS FROM A PUBLIC STREET (FRONT LOADED)
200 LOT HAS GARAGE ACCESS FROM A PRIVATE ALLEY (REAR LOADED)
KEY MAP
SCALE: 1" = 100'
COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP
No. 36467
IN THE UNINCORPORATED TERRITORY OF THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA
PREPARED: 02/24/2014
REVISED: FEBRUARY 23, 2016

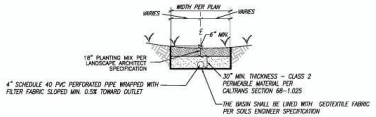
COUNTY OF RIVERSIDE
TENTATIVE TRACT MAP No. 36467



BIO-RETENTION BASIN SECTION A-A
NOT TO SCALE



BIO-RETENTION BASIN SECTION B-B
NOT TO SCALE



BIO-SWALE
NOT TO SCALE

Underground Service Alert DIGALERT Call: TOLL FREE 1-800 227-2600

Pangaea Land Consultants, Inc. 2634 La Mirada Drive Suite H Vista, CA 92081 Tel. (760) 726-4232 Fax. (760) 727-1405

COUNTY OF RIVERSIDE

APPROVED _____ 20 __

BY: _____

PREPARED FOR:

IN THE UNINCORPORATED TERRITORY OF THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

TENTATIVE TRACT MAP No. 36467

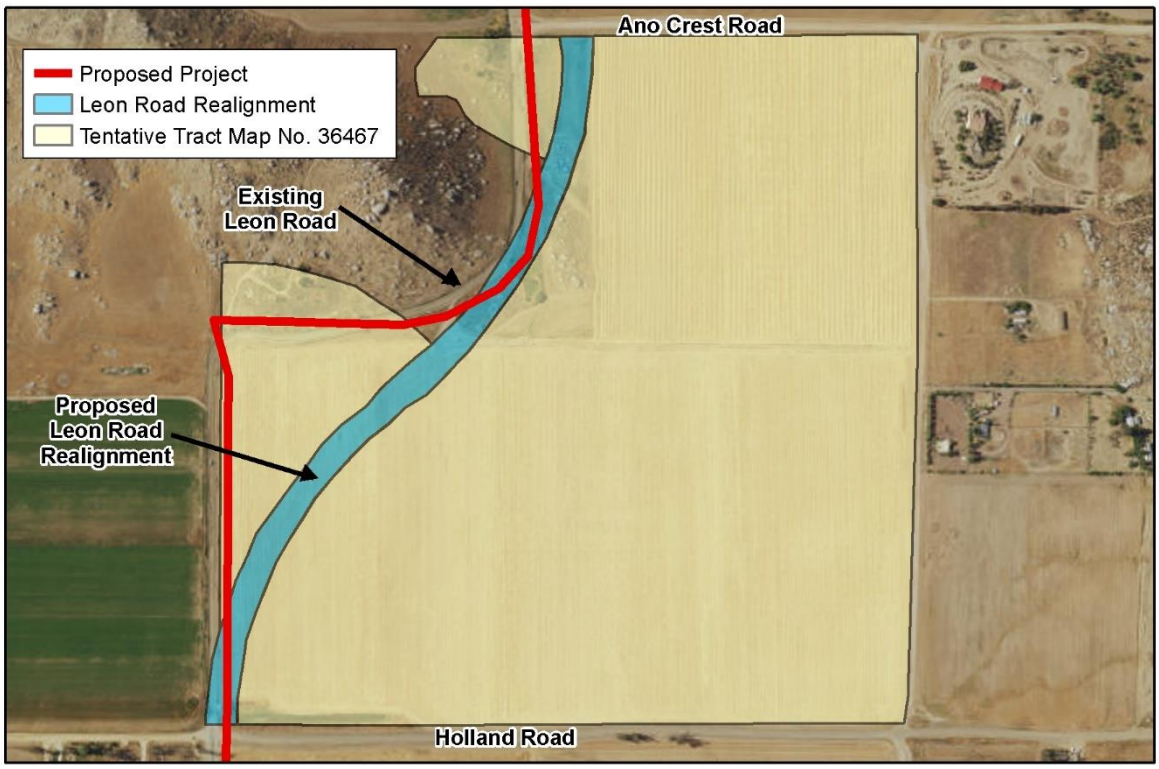
SHEET 4 OF 8

PREPARED: 02/24/2014
REVISED: FEBRUARY 23, 2016

Responses to Comment Set C9

C9-1 Thank you for your comments regarding Tentative Tract Map 36467. During preparation of the Final EIR, the County of Riverside had not decided on this tract map and we were unable to obtain the environmental document or the staff report from the County. Even though the commenter states that the project will be approved, we could not verify what conditions or requirements would be placed on the project with regard to the realignment of Leon Road. To address this potential project, we have included a mitigation measure in Section C.11 (Land Use and Planning) that requires SCE to coordinate with the project developer for this potential project and other proposed projects near the Project alignment. The proposed (VSSP) Project is currently designed to follow the existing alignment of Leon Road, as generally shown in the following exhibit.

Proponents of development projects, such as this one, should coordinate directly with the applicable utility. Please call Southern California Edison's Project Hotline for assistance at 1-866-785-7057.



C9-2 With respect to the proposed Project passing through a culturally sensitive area, three of the cultural resources in question (33-11250, 33-11254, and 33-21021 – provided confidentially, separate from the above comment letter), located west of Leon Road, north of Holland Road, and south of Ano Crest Road, were included in the Draft EIR for the proposed Project. These resources were considered significant and mitigation was drafted to avoid any direct impact to these resources during ground-disturbing activities related to the proposed Project. Therefore, no additional impacts to these known resources would occur should the proposed Project be built. The remaining resource (33-21022) is well outside the proposed Project alignment and was not considered in the EIR.

Comment Set C10 – Resident 2

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 2/23/2016 **Please Print**

Name*: [redacted]

Affiliation (*if any*):*

Address:* [redacted]

City, State, Zip Code:* [redacted]

Telephone Number:* [redacted] **Email:*** [redacted]

Comment: Please remove my personal information and do not publish it. I would like to add myself to the list of Spencers Crossing and neighboring communities that are against the plan to run above ground power line towers down Leon Road. If the power lines can not take an alternate route (my first choice), then I request that the option of underground power lines be used. If I had to rate the 3 options I've been presented, in order from *most* preferred to *least* preferred, I would place find an alternate route as the first option, use the underground options as the second option. The last and *not* preferred option is the above ground towers.

C10-1

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C10

C10-1 Thank you for your comments. The EIR considers two alternatives to SCE's proposed Project, including an alternative that re-routes the subtransmission line alignment along Menifee Road (Alternative 1) to avoid the area of Leon Road where no aboveground utilities currently exist (with the exception of street lighting) and a partial underground alternative (Alternative 2), which would underground the 115-kV subtransmission line for approximately 0.65 miles south of Skyflower Drive. The EIR analysis determined that the CEQA Environmentally Superior Alternative would be Alternative 2 (Partial Underground Alternative). However, the EIR is not a decision document. The Commission will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

Comment Set C11 – Kathleen Heckathorn and David Hindley

From: Kathleen Heckathorn [mailto:kathleen.heckathorn@gmail.com]
Sent: Saturday, February 27, 2016 10:32 AM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Cc: Dave Hidley <mrdave900@juno.com>; Kathleen Heckathorn <kathleen.heckathorn@gmail.com>
Subject: Public Comments on Draft EIR

Good Morning,

I recently attended the February 22, 2016 Public Meeting/Workshop to learn about Southern California Edison's proposed Valley South Subtransmission Project and the Draft Environmental Impact Report.

After hearing all the facts, I am in favor of Alternative #1: Route Alternative Along Menifee Road,
which would reduce the visual impacts with the proposed route. (Leon). **C11-1**

My second choice would be Alternative #2: Partial Underground Alternative

My concerns about the project include:

1) Spoiling the appearance of our beautiful planned community.
2) Decreased property values
3) High tension wires near the landing path of the French Valley Airport
4) The health impacts of living under or near high tension electrical wires. **C11-2**

Thank you for the opportunity to express my concerns.

Kathy Heckathorn and David Hidley
30948 Olympia Rose Drive
Murrieta, CA 92563
(949) 872-9277
Kathleen.Heckathorn@gmail.com

MrDave900@Juno.com

Responses to Comment Set C11

C11-1 Thank you for your comments. The EIR considers two alternatives to SCE's proposed Project, including an alternative that re-routes the subtransmission line alignment along Menifee Road (Alternative 1) to avoid the area of Leon Road where no aboveground utilities currently exist (with the exception of street lighting) and a partial underground alternative (Alternative 2), which would underground the 115-kV subtransmission line for approximately 0.65 miles south of Skyflower Drive. The EIR analysis determined that the CEQA Environmentally Superior Alternative would be Alternative 2 (Partial Underground Alternative). However, the EIR is not a decision document. The Commission will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

C11-2 (1) Aesthetic (visual) impacts of the proposed Project are discussed in EIR Section C.2 (Aesthetics).

(2) The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

(3) As noted in the Project Description (Section B.3.1, page B-12), "SCE would submit FAA Form 7460-1 (Notice of Proposed Construction or Alteration) for those subtransmission and telecommunication structures ("structures") and wire spans exceeding the regulatory thresholds, in this case, primarily due to their proximity to French Valley Airport. Approximately 74 poles/towers are anticipated to require FAA notifications… Once SCE files the notification forms with the FAA, the FAA will conduct an aeronautical study to determine whether certain structures and wire spans in proximity to public airports would present a potential hazard to air navigation or could negatively impact the operational procedures of a nearby airport. Depending on the determination, the FAA may recommend no changes to the design of the proposed structures; or request redesigning the proposed structures to reduce the height; marking the structure, including the addition of aviation lighting; or placement of marker balls on wire spans (see Figure B-3, Example of Existing Marker Ball)."

For clarification, the proposed Project (Segment 1) would include the construction of a new 115-kV subtransmission line, which involves installation of wood poles and light weight steel poles, and then stringing the poles with 115-kV conductor. Existing distribution poles and power lines located along much of the alignment would generally be removed and the power lines transferred onto the new subtransmission poles, which would be taller than the existing distribution poles.

(4) Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website provided below.

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

Comment Set C12 – Jamal Sayegh

From: JAMAL SAYEGH [mailto:jimsayegh07@gmail.com]
Sent: Saturday, February 27, 2016 1:19 PM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Subject: Power lines

We are the Sayegh family residing at Spencer crossing opposing the instillation of the power lines through our community do to the following concerns. C12-1
(1) Health concern
(2)To have an ugly thing to look at day after day, power lines should be installed under ground like the rest of the wires in the community.
We appreciate your help in this matter.
The Sayegh family.
Thank you

Responses to Comment Set C12

C12-1 Your opposition to the proposed Project, specifically in the area of the Spencer's Crossing development has been noted.

(1) Health Concerns: Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website provided below.

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

(**2) Underground:** It is understood that distribution level (12 to 33-kV lines) "power lines" are underground within the noted community. The EIR has identified a significant and unavoidable (Class I) impact along Leon Road where there currently are no above ground utilities (with the exception of street lighting). As such, the EIR considers a partial underground alternative (Alternative 2), which would underground the 115-kV subtransmission line for approximately 0.65 miles south of Skyflower Drive. The EIR analysis determined that the CEQA Environmentally Superior Alternative would be Alternative 2 (Partial Underground Alternative). However, the EIR is not a decision document. The California Public Utilities Commission, as lead agency on the EIR and the agency with jurisdiction over the Valley South Subtransmission Project, will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

Comment Set C13 – Dave McFarland

From: Dave McFarland [mailto:dhmcfarland@yahoo.com]
Sent: Sunday, February 28, 2016 4:25 PM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Subject: Valley South Subtransmission Project Draft EIR Comments

To Whom It May Concern:

I live in the affected area of the proposed transmission line project. I became aware of the Draft EIR and the alternatives to the proposed project. Please consider this e-mail my comment on the alternatives.

I wish to provide my endorsement of: Alternative 2 - Partial Underground Alternative. I believe this will has the least overall impact to our residential area. **C13-1**

Thank you for accepting my comment.

Sincerely,
Dave McFarland
30807 Moonflower Ln.
Murrieta, CA 92563
714-290-5146 (c)

Responses to Comment Set C13

C13-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

Comment Set C14 – Clyde Bacon and Catherine Bacon

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 23 FEB 2016 **Please Print**

Name*: CLYDE J BACON & CATHERINE BACON

Affiliation (*if any*):* SPENCERS CROSSING HOA

Address:* 30915 MOONFLOWER LN;

City, State, Zip Code:* MURRIETA CA 92563

Telephone Number:* 603-731-5142 **Email:*** SKYGUY.CJB@GMAIL.COM

Comment:

* WE SUPPORT ALTERNATIVE # 2 "PARTIAL UNDERGROUND ALTERNATIVE"! **C14-1**

WE SPENT 6 MONTHS LOOKING FOR A HOME IN THIS AREA OF SOUTHERN CA MOSTLY RESALES AND EVEN SOME STILL BUILDING DEVELOPMENTS WERE SADDLED BY CRAPPY VIEWS, POOR ROAD MAINTENANCE; DYING LANDSCAPING; LACK OF PRIDE BY EXISTING RESIDENTS. THEN WE FOUND SPENCERS CROSSING. WIDE WELL MAINTAIN STREETS, GREAT LANDSCAPING; BUT MOST IMPORTANT PRETTY VIEWS AND HAPPY RESIDENTS THAT HAD PRIDE OF ALL UNDERGROUND UTILITIES SO THAT VIEWS WOULD REMAIN. WE WERE HAPPY TO PAY A PREMIUM TO HAVE A HOUSE BUILT IN SPENCERS CROSSING SO THAT WE COULD LOOK AT CLEAR BLUE SKIES WITH NO WIRES. **C14-2**

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016.** You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C14

C14-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

C14-2 It is understood that distribution level (12 to 33-kV lines) "power lines" are underground within the noted community. The EIR has identified a significant and unavoidable (Class I) impact along Leon Road where there currently are no above ground utilities (with the exception of street lighting). As such, the EIR considers a partial underground alternative (Alternative 2), which would underground the 115-kV subtransmission line for approximately 0.65 miles south of Skyflower Drive. The EIR analysis determined that the CEQA Environmentally Superior Alternative would be Alternative 2 (Partial Underground Alternative). However, the EIR is not a decision document. The California Public Utilities Commission, as lead agency on the EIR and the agency with jurisdiction over the Valley South Subtransmission Project, will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

Comment Set C15 – Resident 3

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 2-23-16 **Please Print**

Name*: [redacted]

Affiliation (*if any*):* NA

Address:* [redacted]

City, State, Zip Code:* [redacted]

Telephone Number:* [redacted] **Email:*** [redacted]

Comment: I support alternative #2 – underground utilities. C15-1

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.* – Remove information.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C15

C15-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

Comment Set C16 – Susan Jolly

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 2-28-16 **Please Print**

Name*: Susan Jolly

Affiliation (*if any*):* Spencer Crossing HOA

Address:* 30927 Moonflower Ln

City, State, Zip Code:* Murrieta CA 92563

~~Telephone~~ Number:* 303-877-2405 (cell) **Email:*** _____

Comment:

I can support "Alternative #2 Partial Underground" Alternative.

Bought here with the understanding all utilities were underground

C16-1

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016.** You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C16

C16-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted. It is understood that distribution level (12 to 33-kV lines) "power lines" and other utilities are underground within the Spencer's Crossing community. The California Public Utilities Commission, as lead agency on the EIR and the agency with jurisdiction over the Valley South Subtransmission Project, will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

Comment Set C17 – Paul Reasbeck and Family, Sssentago Family, Flores Family

From: Paul Reasbeck [mailto:skydivingyogi@hotmail.com]
Sent: Monday, February 29, 2016 12:06 PM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Subject: Opposition towards alternate route along menifee road

I am writing to express my concerns over the project taking the alternative route along menifee road. (this is the blue highlighted route on your website) There are several reasons besides the obvious fact that the route is much longer that this project should not come down menifee road.

Obviously a much longer route such as this alternative would disturb more the wildlife in this area. Additionally there are sacred indian grounds just north of baxter along menifee that should not be disturbed. **C17-1**

Another concern is that my house at 35030 menifee just south of baxter on the east side of menifee is at the same height as the current transmission lines and these line are already at maximum capacity. Increasing the voltage would mean increasing the electromagnetic frequencies my children, my neighbors children and my farm animals are exposed to. In this day and age all transmission lines should be buried to protect the wildlife and the children in the areas. These transmission lines would be dangerously close to my children bedrooms and as our house sits up on the hill we are directly in line with these transmission lines. **C17-2**

Another concern is our local hawk population. It is already dwindling because of current transmission lines. Rather than kill off all the wildlife perhaps a more "local" power plant should be considered before an alternate route that is so much longer is considered. **C17-3**

Lastly we are home to many of the horned toad in this are. As the road will not be developed down baxter this area is one of the last places this beautiful creature flourishes. Putting taller and larger poles down menifee would certainly disrupt the habitats of this prehistoric creature.
So please please do not consider this a viable alternate route. There is too much at stake. **C17-4**

Sincerely
Paul Reasbeck and Family

The Sssentago Family,

and the Flores Family

All residents here at 35030 Menifee Road

Responses to Comment Set C17

C17-1 Your opposition to Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) has been noted. The environmental impacts associated with Alternative 1 are analyzed in EIR Section D. As stated in Table D-6 (Comparison of Alternatives), more cultural resources are present on the Alternative 1 route compared to the proposed Project.

C17-2 As stated in the description for Alternative 1 (see EIR Section D.3.1), the alternative would proceed south along Menifee Road following an existing 115-kV subtransmission line, either replacing it or being co-located. As such the proposed line and the existing line would be of the same voltage (115-kV). Your preference for undergrounding of all transmission lines is noted.

C17-3 Impacts to biological resources for Alternative 1 are discussed in EIR Section D.3.1 (pages D-14 to D-15) and were determined to be the same as the proposed Project, and would be mitigated through implementation of Mitigation Measures BIO-1 through BIO-26.

A "local" power plant as an alternative to Alternative 1, which increases the subtransmission line route from 15.4 to 19 miles in length, would not fulfill the basic objectives of the Project, which are to add capacity to the transmission system to prevent outages and to serve long-term forecasted electrical demand requirements in the areas served by the Valley South 115-kV subtransmission system. Per CEQA Guidelines Section 15126.6(c), "the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects."

C17-4 Please see response to C17-3, above. The Commission will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

Comment Set C18 – George and Celia Mohr

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 02/24/2016 **Please Print**

Name*: George & Celia Mohr

Affiliation (*if any*):* Spencers Crossing HOA members

Address:* 30900 Moonflower Ln.

City, State, Zip Code:* Murrieta, CA 92563

Telephone Number:* 951-926-0574 **Email:*** g_mohr@verizon.net

Comment: We are definitely in favor of alternative #2: partial underground – as this will be the safer and more attractive alternative. C18-1

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C18

C18-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

Comment Set C19 – Resident 4

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 02/25/16 **Please Print**

Name*: [redacted]

Affiliation (*if any*):*

Address:* [redacted]

City, State, Zip Code:* [redacted]

Telephone Number:* [redacted] **Email:*** [redacted]

Comment: I AM WRITING TO YOU TODAY TO ADVISE YOU I AM AGAINST THE ADDITION OF POWERLINES IN MY NEIGHBORHOOD. WE BOUGHT IN THIS AREA FOR THE NICE VIEWS AND ATTRACTIVE SURROUNDING AREAS. I AND MY WIFE [redacted], BELIEVE THE ADDITION OF POWER LINES DOWN LEON WOULD TAKE AWAY FROM THE BEAUTY OF THE AREA, WE ALSO BELIEVE IT WOULD LEAD TO POSSIBLY DOWN THE ROAD, LOWER RE-SALE VALUE AND HEALTH CONCERNS.

WE DO RECOMEND HOWEVER, OPTION # 2 THE UNDERGROUND UTILITIES PROPOSAL

C19-1

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.* YES, PLEASE DO NOT MAKE MY INFO PUBLIC

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C19

C19-1 Your opposition to the proposed Project and preference for Alternative 2 (Partial Underground Alternative) have been noted. The EIR has identified a significant and unavoidable (Class I) impact along Leon Road where there currently are no above ground utilities (with the exception of street lighting). The California Public Utilities Commission, as lead agency on the EIR and the agency with jurisdiction over the VSSP, will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website, noted below.

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

Comment Set C20 – Chad Bartley and Bridgit Mcginty

From: Chad Bartley [mailto:cbartley@uitinspectors.us]
Sent: Monday, February 29, 2016 7:53 PM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Subject: Valley South Subtransmission Project

To whom it may concern,

Me and my Fiancé have lived in the tract of homes between Jean Nicholas and Max Gillis for 8 yrs. We enjoy the morning and afternoon walks with our two young children along Leon Rd. This walking path is what sold us on moving to this location. If the proposed transmission lines are to go up we will not use this walking path and I'm sure a lot of our neighbors will feel the same way. This project was never brought to our attention by the usual public postings or even by mail. We were just notified by a resident across the street located at Spencer's Crossing. We hope our voice can heard.

C20-1

C20-2

Thank you,

Chad Bartley and Bridgit Mcginty

Comment Set C20 (continued)

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 03/01/2016 **Please Print**

Name*: Chad Bartley and Bridgit Mcginty

Affiliation (*if any*):* Resident near proposed project

Address:* 31205 Euclid Loop

City, State, Zip Code:* Winchester, Ca. 92596

Telephone Number:* 951-926-4349 **Email:*** Chadbridgit@yahoo.com

Comment: We do not want the transmission pole project to proceed along Leon Rd. as proposed. Acceptable alternatives would be no project at all or very least bury transmission lines out of sight.

C20-3

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Responses to Comment Set C20

C20-1 Per the EIR analysis in Section C.13 (Recreation), the proposed Project would not result in a physical deterioration to existing trails, bike paths, or pedestrian sidewalks with implementation of Mitigation Measure REC-1 (Identify and Provide Noticing of Alternative Recreation Areas). This measure applies during construction when temporary effects would occur.

C20-2 Under California Environmental Quality Act (CEQA) Guidelines Section 15087(a), Public Review of Draft EIR, the lead agency (California Public Utilities Commission) must provide notice of the availability of the Draft EIR to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and by at least one of the following procedures: (1) publication at least one time in a newspaper of general circulation in the area affected by the proposed project or in the newspaper of largest circulation from among the newspapers of general circulation (if more than one area), (2) posting on and off the site in the area where the project would be located, *or* (3) direct mailing to the owners and occupants of property contiguous to the parcels on which the project would be located based on the latest equalized assessment roll. Additionally, under CEQA Guidelines Section 15087(d), the Notice of Availability (NOA) shall also be posted in the office of the county clerk of each county in which the project is located.

A NOA letter for the Draft EIR was mailed to over 130 interested parties (CEQA Guidelines §15087(a)), which included individuals who had previously commented on the Project during the scoping period (May 5, 2015 to June 8, 2015), and a NOA postcard was mailed to over 625 residences located within 300 feet of the proposed and alternative alignments (CEQA Guidelines §15087(a)(3)). Additionally, newspaper notices were placed in The Press-Enterprise on January 30, 2016 and February 12, 2016, as well as in The Californian (An Edition of the UT San Diego) on February 12, 2016, and The Anza Valley Outlook on February 19, 2016 (CEQA Guidelines §15087(a)(1)). These notices included information on the proposed Project, where to obtain information on the Draft EIR, and details regarding the public meeting. As such, the notification for the Valley South Subtransmission Project meets and exceeds the regulatory requirements under CEQA.

Furthermore, all those who signed-in during the public meeting held on February 22, 2016 and those who submitted comments on the Draft EIR have been added to the Project mailing list to receive all future CEQA-related Project communications. Also see response to Comment C7 for information on the additional noticing conducted by SCE.

C20-3 Your opposition to the proposed Project and preference for the No Project (Alternative 3) or at least the Partial Underground Alternative (Alternative 2) have been noted. The California Public Utilities Commission will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the Project, including consideration of the alternatives evaluated in the EIR.

Comment Set C21 – Melinda and Thomas Newburn

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 2/29/16 **Please Print**

Name*: Melinda & Thomas Newburn

Affiliation (*if any*):*

Address:* 30924 Moonflower Lane

City, State, Zip Code:* Murrieta, CA 92563

Telephone Number:* 951-926-0450 **Email:*** Melindaan@yahoo.com

Comment:

Southern California Edison's proposed Valley South Subtransmission Project and draft Environmental Impact Report.

I am in favor of Alternative #1: Route Alternative Along Menifee Rd, it would reduce the visual impact of proposed route (Leon Rd). C21-1

Second choice would be Alternative #2: Partial Underground Alternative.

Concerns of project:

- Disgracing the appearance of our planned community C21-2
- Decreased property values C21-3
- Too close to planes landing path to FV airport C21-4
- Health impacts to myself and children having high tension electrical wires to close to home. C21-5
- I wouldn't have bought a home so close to high tension electrical wires, so is upsetting that they are proposed after we bought a home here, 3 years ago. C21-6

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.* yes / remove this info

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016.** You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Response to Comment Set C21

C21-1 Your preference for Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) or Alternative 2 (Partial Underground Alternative), if the Project is approved, is noted.

C21-2 As discussed in the EIR, the proposed Project would result in long-term changes in the landscape that degrade the existing visual character or quality (Impact AES-6).

C21-3 The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

C21-4 As noted in the Project Description (Section B.3.1, page B-12), "SCE would submit FAA Form 7460-1 (Notice of Proposed Construction or Alteration) for those subtransmission and telecommunication structures ("structures") and wire spans exceeding the regulatory thresholds, in this case, primarily due to their proximity to French Valley Airport. Approximately 74 poles/towers are anticipated to require FAA notifications… Once SCE files the notification forms with the FAA, the FAA will conduct an aeronautical study to determine whether certain structures and wire spans in proximity to public airports would present a potential hazard to air navigation or could negatively impact the operational procedures of a nearby airport. Depending on the determination, the FAA may recommend no changes to the design of the proposed structures; or request redesigning the proposed structures to reduce the height; marking the structure, including the addition of aviation lighting; or placement of marker balls on wire spans (see Figure B-3, Example of Existing Marker Ball)."

C21-5 Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website noted below.

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

For clarification, the proposed Project (Segment 1) would include the construction of a new 115-kV subtransmission line, which involves installation of wood poles and light weight steel poles, and then stringing the poles with 115-kV conductor. Existing distribution poles and power lines located along much of the alignment would generally be removed and the power lines transferred onto the new subtransmission poles, which would be taller than the existing distribution poles.

C21-6 Comment noted.

Comment Set C22 – Cecilia Rubalcava

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3/01/2016 **Please Print**

Name*: Cecilia Rubalcava

Affiliation (if any):* Resident in close proximity to proposed project.

Address:* 31186 Euclid Loop.

City, State, Zip Code:* Winchester, Ca. 92596

Telephone Number:* (760) 807-8670 **Email:*** chargers-100@yahoo.com

Comment: We do not want or agree to the Valley South Subtransmission pole project proposed to proceed along Leon road. C22-1

Acceptable alternatives would be no project at all or at the very least to bury the transmission lines underground out of sight.

We as residents in this community have not been properly notified of this project and is not something we agree to. C22-2

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Voicemail-Fax
888-400-3930

Must submit by March 14th 2016

Responses to Comment Set C22

C22-1 Your opposition to the proposed Project has been noted, as well as your preference for Alternative 3 (No Project Alternative) or at least Alternative 2 (Partial Underground Alternative), if the Project is approved.

C22-2 Under California Environmental Quality Act (CEQA) Guidelines Section 15087(a), Public Review of Draft EIR, the Lead Agency (California Public Utilities Commission [CPUC]) must provide notice of the availability of the Draft EIR to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and by at least one of the following procedures: (1) publication at least one time in a newspaper of general circulation in the area affected by the proposed project or in the newspaper of largest circulation from among the newspapers of general circulation (if more than one area), (2) posting on and off the site in the area where the project would be located, *or* (3) direct mailing to the owners and occupants of property contiguous to the parcels on which the project would be located based on the latest equalized assessment roll. Additionally, under CEQA Guidelines Section 15087(d), the Notice of Availability (NOA) shall also be posted in the office of the county clerk of each county in which the project is located.

A NOA letter for the Draft EIR was mailed to over 130 interested parties (CEQA Guidelines §15087(a)), which included individuals who had previously commented on the Project during the scoping period (May 5, 2015 to June 8, 2015), and a NOA postcard was mailed to over 625 residences located within 300 feet of the proposed and alternative alignments (CEQA Guidelines §15087(a)(3)). Additionally, newspaper notices were placed in The Press-Enterprise on January 30, 2016 and February 12, 2016, The Californian (An Edition of the UT San Diego) on February 12, 2016, and The Anza Valley Outlook on February 19, 2016 (CEQA Guidelines §15087(a)(1)). The notices included information on the proposed Project, where to obtain information on the Draft EIR, and details regarding the public meeting. As such, the notification for the Valley South Subtransmission Project meets and exceeds the regulatory requirements under CEQA.

Furthermore, all those who signed-in during the public meeting held on February 22, 2016 and those who submitted comments on the Draft EIR have been added to the Project mailing list to receive all future CEQA-related Project communications.

The CPUC is the public agency with the principal responsibility for approving or denying the Project, and as such is the Lead Agency under CEQA. CEQA requires the Lead Agency to consider the information contained in the EIR, including these comments, prior to taking any discretionary action. The EIR serves as an informational document to be considered by the CPUC and other permitting agencies during deliberations on the Project. The CPUC will consider approval of the Permit to Construct (PTC), and recommend a decision. The CPUC has the final decision on the PTC.

Comment Set C23 – Paul and Alba Chassey

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3 - 3 - 2016 **Please Print**

Name*: PAUL + ALBA CHASSEY

Affiliation (*if any*):*

Address:* 30809 PRAIRIE SUN WAY

City, State, Zip Code:* MURRIETA CA 92563

Telephone Number:* 760 240 3092 **Email:*** PAULCHASSEY1@JUNO.COM

Comment:

We are writing to protest the placing of overhead lines through the middle of our new neighborhood.

The Developers and Sales people of the Spencer's Crossing project promoted the sales process to buyers, highlighting underground utilities as one of the many benefits of this new community. These unsightly poles will go right down the middle of a beautiful, peaceful nature walk. The path will be no longer be beautiful and peaceful with an unobstructed view of the mountains. **C23-1**

This project will affect our property values negatively. There will possibly be a negative disclosure required on all home sales contracts. Who would want to buy a home with these poles bisecting the over 600 houses? **C23-2**

There is also a danger from the many low flying planes attempting landings at French Valley Airport. **C23-3**

Three alternatives have been submitted. **We favor alternative 2,** Partial Underground. Thank you. **C23-4**

And as an important sideline, we strongly object to the rule that allows SCE to only notify customers within 300 feet of the affected project.
This particular project affects people in the entire development, as these unsightly poles will be seen throughout Spencer's Crossing. The only way we found out about the project was because my neighbor two houses away from us got a notice and we didn't. **C23-5**

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C23

C23-1 It is understood that distribution level (12 to 33-kV lines) "power lines" are underground within the noted community. The EIR has identified a significant and unavoidable (Class I) impact along Leon Road where there currently are no above ground utilities (with the exception of street lighting). As such, the EIR considers a partial underground alternative (Alternative 2), which would underground the 115-kV subtransmission line for approximately 0.65 miles south of Skyflower Drive. The EIR analysis determined that the CEQA Environmentally Superior Alternative would be Alternative 2 (Partial Underground Alternative). However, the EIR is not a decision document. The Commission will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

C23-2 The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

C23-3 As noted in the Project Description (Section B.3.1, page B-12), "SCE would submit FAA Form 7460-1 (Notice of Proposed Construction or Alteration) for those subtransmission and telecommunication structures ("structures") and wire spans exceeding the regulatory thresholds, in this case, primarily due to their proximity to French Valley Airport. Approximately 74 poles/towers are anticipated to require FAA notifications… Once SCE files the notification forms with the FAA, the FAA will conduct an aeronautical study to determine whether certain structures and wire spans in proximity to public airports would present a potential hazard to air navigation or could negatively impact the operational procedures of a nearby airport. Depending on the determination, the FAA may recommend no changes to the design of the proposed structures; or request redesigning the proposed structures to reduce the height; marking the structure, including the addition of aviation lighting; or placement of marker balls on wire spans (see Figure B-3, Example of Existing Marker Ball)."

C23-4 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

C23-5 Under California Environmental Quality Act (CEQA) Guidelines Section 15087(a), Public Review of Draft EIR, the lead agency (California Public Utilities Commission) must provide notice of the availability of the Draft EIR to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and by at least one of the following procedures: (1) publication at least one time in a newspaper of general circulation in the area affected by the proposed project or in the newspaper of largest circulation from among the newspapers of general circulation (if more than one area), (2) posting on and off the site in the area where the project would be located, *or* (3) direct mailing to the owners and occupants of property contiguous to the parcels on which the project would be located based on the latest equalized assessment roll. Additionally, under CEQA Guidelines Section 15087(d), the Notice of Availability (NOA) shall also be posted in the office of the county clerk of each county in which the project is located.

A NOA letter for the Draft EIR was mailed to over 130 interested parties (CEQA Guidelines §15087(a)), which included individuals who had previously commented on the Project during the scoping period (May 5, 2015 to June 8, 2015), and a NOA postcard was mailed to over 625 residences located within 300 feet of the proposed and alternative alignments (CEQA Guidelines §15087(a)(3)). Additionally, newspaper notices were placed in The Press-Enterprise on January 30, 2016 and February 12, 2016, in The Californian (An Edition of the UT San Diego) on February

12, 2016, and The Anza Valley Outlook on February 19, 2016 (CEQA Guidelines §15087(a)(1)). These notices included information on the proposed Project, where to obtain information on the Draft EIR, and details regarding the public meeting. As such, the notification for the Valley South Subtransmission Project meets and exceeds the regulatory requirements under CEQA.

Furthermore, all those who signed-in during the public meeting held on February 22, 2016 and those who submitted comments on the Draft EIR have been added to the Project mailing list to receive all future CEQA-related Project communications.

Comment Set C24 – Harold Stovall

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3-6-2016 **Please Print**

Name*: HAROLD STOVALL

Affiliation (*if any*):* SPENCER'S CROSSING HOME OWNER

Address:* 30946 MOONFLOWER LANE

City, State, Zip Code:* MURRIETA, CA 92563

Telephone Number:* 760-855-1115 **Email:*** hdstovall@sbcglobal.net

Comment: I HAVE COME AWARE IN THE PAST YEAR THAT SCE HAD FILED THE "VALLEY SOUTH PROJECT" WITH THE CALIF. PUBLIC UTILITIES COMMISSION (CPUC). I UNDERSTAND THAT THE PROJECT WILL INSTALL 115 KV TRANSMISSION LINES ON APPROX 100' TALL POLES ~~FBI~~ ALONG LEON. I PURCHASED MY PROPERTY 5 YRS AGO AND NOTHING ABOUT THIS PROJECT WAS MENTIONED. IF THE PROJECT CONTINUES DOWN LEON ALL OUR PROPERTY VALUES WILL DECLINE NOT TO MENTION MEDICAL IMPLICATIONS. I HEARD THE IS AN ALTERATE UNDERGROUND PROPOSAL ★ I WANT THE TRASMISSION LINES TO BE PLACED UNDERGROUND ~~WHAT~~ OR AN ALTERNATE ROUTE OFF LEON STREET. ANY ALTERNATE ROUTE BUT LEON SHOULD BE CONSIDERED. SINCE MY HOUSE BACKS UP TO THIS STEET!

VERY CONCERNED HOME OWNER HD Stovall

C24-1

OTHERWISE I WOULD NOT HAVE PURCHASED HERE.

NOT SURE ABOUT THIS.

*Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C24

C24-1 The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website, noted below.

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

C24-2 Your preference for Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) or Alternative 2 (Partial Underground Alternative), if the Project is approved, is noted.

Comment Set C25 – Jaime Corral

From: Jaime Corral [mailto:tbcmex@gmail.com]
Sent: Saturday, March 5, 2016 12:58 PM
To: Valley-South- Project <Valley-South-Project@aspeneg.com>
Subject: Valley South Project

To whom it may concern, I live in the Spencers crossing community of Murrieta, one of the reasons why I moved here is because of the underground power lines, as a 25 year customer of Southern California Edison I oppose overhead power lines please consider option 2 which is underground power lines. Thank you for your understanding! **C25-1**

Responses to Comment Set C25

C25-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

Comment Set C26 – Syvret Warner

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 27 FEB 2016 **Please Print**

Name*: SYVRET WARNER

Affiliation (*if any*):* MEMBER OF SPENCER'S CROSSING HOA

Address:* 35687 SUGAR MAPLE ST.

City, State, Zip Code:* MURRIETA, CA 92563

Telephone Number:* (619) 947-5953 **Email:***

Comment: I SUPPORT PARTIAL UNDERGROUND ALTERNATIVE #2. C26-1

"PLEASE WE FIGHT TO MAINTAIN OUR PROPERTY VALUE PLEASE DO NOT TAKE AWAY FROM IT" C26-2

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspenet.com or by fax at: (888) 400-3930.

Responses to Comment Set C26

C26-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

C26-2 The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

Comment Set C27– Jennifer Roane

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 2.28.2016 **Please Print**

Name*: Jennifer Roane

Affiliation (*if any*):* member of Spencer's Crossing HOA

Address:* 30939 Moonflower Lane

City, State, Zip Code:* Murrieta CA 92563

Telephone Number:* 9094999137 **Email:*** jennifer.roane@gmail.com

Comment:

this letter serves as my written support for Alternative #3 – Partial underground.

As a home owner that purchased my home for the open air view and the lack of poles, I really do not want poles lining the outside of my back fence. C27-1

I will continue to support Alternative #3.

Jennifer Roane

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C27

C27-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

Comment Set C28 – Moses and Ruby Menchaca

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: March 4 2016 **Please Print**

Name*: Moses Menchaca, Ruby Menchaca

Affiliation (*if any*):* Member of Spencer's Crossing HOA

Address:* 30867 Moonflower Ln

City, State, Zip Code:* Murrieta CA 92563

Telephone Number:* (714) 356-5522 **Email:*** MMenchaca@yahoo.com

Comment: I support partial underground alternative #2 **C28-1**

" Please we fight to maintain our property value Please dont take Away from it. " **C28-2**

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C28

C28-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

C28-2 The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

Comment Set C29 – Gary Tripodi

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: MARCH 6, 2016 **Please Print**

Name*: GARY TRIPODI

Affiliation (*if any*):*

Address:* 30780 MOONFLOWER LANE

City, State, Zip Code:* MURRIETA, CA 92563

Telephone Number:* 909-367-5799 **Email:*** gstripo@yahoo.com

Comment: MY CONCERNS RANGE FROM THE LONG TERM EFFECTS OF EMF'S FOR THE RESIDENTS WHO PLAN ON LIVING IN SPENCERS CROSSING FOREVER TO THE EFFECTS ON CHILDREN. C29-1

ALLOWING THESE POLES TO FOLLOW LEON ROAD WILL EFFECT PROPERTY VALUES. THERE ARE MANY MILITARY RESIDENTS THAT LIVE IN OUR COMMUNITY WHO SHOULDN'T HAVE THIS EYE SORE ISSUE TO DEAL WITH IN THEIR BUYING OR SELLING IN THE FUTURE. C29-2

Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C29

C29-1 Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website, noted below.

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

C29-2 The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

The visual impacts of the Project are disclosed in the EIR in Section C.2 (Aesthetics – see Impact AES-6)). It was determined that the proposed Project would result in long-term degradation of the existing visual character or quality in select areas, specifically, in the area of Leon Road along the Spencer's Crossing development. An alternative, which proposes undergrounding the proposed 115-kV subtransmission line along this existing development has been considered in the EIR (Alternative 2: Partial Underground Alternative).

Comment Set C30 – Frank and Donna Williams

From: Donna Williams <donnaleewms@yahoo.com>
Date: March 13, 2016 at 2:39:05 PM MDT
To: Valley-South-Project@aspeneg.com
Subject: Telephone poles

We live at 35366 Mayapple Ct.,Murrieta 92563. Our desire is that no telephone poles be put up along Leon Rd. in the green belt bordering the road. We would prefer that the telephone lines be put underground so as to keep the beauty of that Spencer's Crossing area intact. **C30-1**
Frank and Donna Williams
951-325-8433

Sent from my iPhone

Responses to Comment Set C30

C30-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted. Note that the proposed Project involves the installation of 115-kV subtransmission "power" lines, not telephone lines. The EIR has identified a significant and unavoidable (Class I) impact along Leon Road where there currently are no above ground utilities (with the exception of street lighting). As such, the EIR considers a partial underground alternative (Alternative 2), which would underground the 115-kV subtransmission line for approximately 0.65 miles south of Skyflower Drive. The EIR analysis determined that the CEQA Environmentally Superior Alternative would be Alternative 2 (Partial Underground Alternative). However, the EIR is not a decision document. The Commission will review the EIR and other information (e.g. purpose and need, etc.) when deciding on the proposed Project, including consideration of the alternatives evaluated in the EIR.

Comment Set C31 – Heather and Jeffrey Gagliano

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3/13/16 **Please Print**

Name*: Heather + Jeffrey Gagliano

Affiliation (*if any*):*

Address:* 35133 Goldthread Ln

City, State, Zip Code:* Murrieta, CA 92563

Telephone Number:* 949-480-8947 **Email:*** hm894@yahoo.com

Comment: If this project is completed I am very concerned for my neighborhood. Not only will it look terrible but our home values will suffer. I am not sure if there are proven health affects but I plan to look into it more and research ever study that I can find that has been done on this. I have also been told with the airport so close that FAA has to approve this. I will be contacting the FAA to see what their take on this project is. I am completely against this project happening at all but worse case scenario I would like to see the wires be put underground. C31-1 C31-2 C31-3 C31-4

Thank you,
Heather Gagliano

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C31

C31-1 The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

The visual impacts of the Project are disclosed in the EIR in Section C.2 (Aesthetics – see Impact AES-6)). It was determined that the proposed Project would result in long-term degradation of the existing visual character or quality in select areas, specifically, in the area of Leon Road along the Spencer's Crossing development. An alternative, which proposes undergrounding the proposed 115-kV subtransmission line along this existing development has been considered in the EIR (Alternative 2: Partial Underground Alternative).

C31-2 Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website, noted below.

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

C31-3 As noted in the Project Description (Section B.3.1, page B-12), "SCE would submit FAA Form 7460-1 (Notice of Proposed Construction or Alteration) for those subtransmission and telecommunication structures ("structures") and wire spans exceeding the regulatory thresholds, in this case, primarily due to their proximity to French Valley Airport. Approximately 74 poles/towers are anticipated to require FAA notifications… Once SCE files the notification forms with the FAA, the FAA will conduct an aeronautical study to determine whether certain structures and wire spans in proximity to public airports would present a potential hazard to air navigation or could negatively impact the operational procedures of a nearby airport. Depending on the determination, the FAA may recommend no changes to the design of the proposed structures; or request redesigning the proposed structures to reduce the height; marking the structure, including the addition of aviation lighting; or placement of marker balls on wire spans (see Figure B-3, Example of Existing Marker Ball)."

C31-4 Your opposition to the proposed Project and preference for Alternative 2 (Partial Underground Alternative) have been noted.

Comment Set C32 – Tina Heims

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3/01/2016 **Please Print**

Name*: Tina Heims

Affiliation (If any):* Resident in close proximity to proposed project.

Address:* 35289 SAGUARO DR

City, State, Zip Code:* Winchester, Ca. 92596

Telephone Number:* 9512523482 **Email:*** tina.heims82@gmail.com

Comment: We do not want or agree to the Valley South Subtransmission pole project proposed to proceed along Leon road. Acceptable alternatives would be no project at all or at the very least to bury the transmission lines underground out of sight. C32-1

We as residents in this community have not been properly notified of this project and is not something we agree to. C32-2

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Responses to Comment Set C32

C32-1 Your opposition to the proposed Project has been noted, as well as your preference for Alternative 3 (No Project Alternative) or at least Alternative 2 (Partial Underground Alternative), if the Project is approved.

C32-2 Under California Environmental Quality Act (CEQA) Guidelines Section 15087(a), Public Review of Draft EIR, the Lead Agency (California Public Utilities Commission [CPUC]) must provide notice of the availability of the Draft EIR to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and by at least one of the following procedures: (1) publication at least one time in a newspaper of general circulation in the area affected by the proposed project or in the newspaper of largest circulation from among the newspapers of general circulation (if more than one area), (2) posting on and off the site in the area where the project would be located, *or* (3) direct mailing to the owners and occupants of property contiguous to the parcels on which the project would be located based on the latest equalized assessment roll. Additionally, under CEQA Guidelines Section 15087(d), the Notice of Availability (NOA) shall also be posted in the office of the county clerk of each county in which the project is located.

A NOA letter for the Draft EIR was mailed to over 130 interested parties (CEQA Guidelines §15087(a)), which included individuals who had previously commented on the Project during the scoping period (May 5, 2015 to June 8, 2015), and a NOA postcard was mailed to over 625 residences located within 300 feet of the proposed and alternative alignments (CEQA Guidelines §15087(a)(3)). Additionally, newspaper notices were placed in The Press-Enterprise on January 30, 2016 and February 12, 2016, The Californian (An Edition of the UT San Diego) on February 12, 2016, and The Anza Valley Outlook on February 19, 2016 (CEQA Guidelines §15087(a)(1)). These notices included information on the proposed Project, where to obtain information on the Draft EIR, and details regarding the public meeting. As such, the notification for the Valley South Subtransmission Project meets and exceeds the regulatory requirements under CEQA.

Furthermore, all those who signed-in during the public meeting held on February 22, 2016 and those who submitted comments on the Draft EIR have been added to the Project mailing list to receive all future CEQA-related Project communications.

The CPUC is the public agency with the principal responsibility for approving or denying the Project, and as such is the Lead Agency under CEQA. CEQA requires the Lead Agency to consider the information contained in the EIR, including these comments, prior to taking any discretionary action. The EIR serves as an informational document to be considered by the CPUC and other permitting agencies during deliberations on the Project. The CPUC will consider approval of the Permit to Construct (PTC), and recommend a decision. The CPUC has the final decision on the PTC.

Comment Set C33 – Jacquelyn Can

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3/13/16 **Please Print**

Name*: Jacquelyn Can

Affiliation (*if any*):*

Address:* 35058 Goldthread Ln

City, State, Zip Code:* Murrieta, CA 92563

Telephone Number:* 323)388-7101 **Email:*** Jpcan81@yahoo.com

Comment: I would like to oppose on the valley south project, I am a resident that will be affected if this project gets approved. I oppose because of any health risks it may cause to live to close to the power lines, it may affect the air, the noise it will cause while during its construction, it may affect nature on the site it would go on if approved. And also I do not want to look out my window and see those power lines.

Thank you & God Bless

C33-1

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please **submit comments no later than March 14, 2016**. You may also submit written comments by email at: Valley-South-Project@aspeneg.com or by fax at: (888) 400-3930.

Responses to Comment Set C33

C33-1 Your opposition to the Project has been noted.

Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website: http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm.

Impacts related to air quality, biological resources, and noise are addressed in EIR Sections C.4 (Air Quality), C.5 (Biological Resources, and C.12 (Noise). Air quality, biological resources, and noise impacts associated with the proposed Project were determined to either be less than significant (Class III) or could be mitigated to a less-than-significant level with the proposed mitigation measures (see Tables C.4-12, C.5-11, and C.12-9). The visual impacts of the Project are disclosed in the EIR in Section C.2 (Aesthetics – see Impact AES-6)). It was determined that the proposed Project would result in long-term degradation of the existing visual character or quality in select areas, specifically, in the area of Leon Road along the Spencer's Crossing development. An alternative, which proposes undergrounding the proposed 115-kV subtransmission line along this existing development has been considered in the EIR (Alternative 2: Partial Underground Alternative).

Comment Set C34 – Sheryl Saenz

Valley South Subtransmission Project
Draft EIR Comments - c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, California 91301

March 14, 2016

To whom it may concern:

My name is Sheryl Saenz, and I live in Murrieta near the private properties that align Menifee Road between Baxter Road and Lee Lane. We purchased our land several years ago because of its tranquility and country-like surroundings. While I am certain that many areas in Murrieta will continue to grow and be in the path of progress, this area should not be disrupted. Your collaboration with Southern California Edison Company to provide an environmental impact assessment is far too sugar-coated to be unbiased. In your report, you use words such as "visual resources" and "cultural resources" where you should objectively state it would be "obtrusive" and "impedant". C34-1

Based on economics and alignment with the existing power lines, it is unethical and fiscally irresponsible to diverge so drastically and cut into a <u>far more distant</u> "path" for these new lines simply because the residents living near Leon Road don't <u>want</u> the lines near them. We don't either, and I speak for every neighbor in the area of Menifee Road between Baxter and Lee Lane. **This is a rural area, but not uninhabited, and it should NOT be open for erosion and disruption of it's natural wildlife and beauty for the sake of those who live in the current, existing and <u>rightful path of development</u> along Leon Road.** Leave Menifee Road as a sacred and culturally rich area, unaltered. C34-2

I can be reached at **951-532-5977**, day or evening, if you'd like to discuss the project.

Sheryl Saenz, Murrieta Resident
28720 Lee Lane, Murrieta, CA 92563

Responses to Comment Set C34

C34-1 Aspen Environmental Group prepared the EIR as an independent third-party under contract with the California Public Utilities Commission (CPUC), which is the Lead Agency under the California Environmental Quality Act (CEQA). The terminology used, such as "visual resources" and "cultural resources" come from the CEQA Guidelines, Appendix G. Impacts are assessed following the CEQA Guidelines and the significance criteria set by the CPUC.

C34-2 Your opposition to Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) has been noted. The environmental impacts associated with Alternative 1 are analyzed in EIR Section D. As stated in Table D-6 (Comparison of Alternatives), more cultural resources are present on the Alternative 1 route compared to the proposed Project.

Comment Set C35 – Robert LaFond

Valley South Subtransmission Project
Draft EIR Comments - c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, California 91301

March 14, 2016

To whom it may concern:

My name is Robert LaFond, and I am a resident of Murrieta. I would like to challenge any pending decision to pursue Alternative 1: Route Alternative Along Menifee Road. My family owns land that would be impacted by this decision, and unless there is a plan to put these ugly power lines underground, we do not want them just for the purpose of planning for others to be able to power their hybrid vehicles. Keep the power lines in line with the other lines, you do not need to rechannel so far out of the way to a rural area just because there are less people living there who will complain. It affects our lifestyle, it grossly devalues our property greatly, and it is absolutely not right. We have paid our taxes and maintained our land, and we want to keep this undisturbed land as low-density rural living for future generations who may appreciate the natural resources that are becoming so rare and irreplaceable. C35-1

Robert LaFond, 35475 Twin Willow, Murrieta, CA 92563
951-532-3026

Responses to Comment Set C35

C35-2 Your opposition to Alternative 1 (Subtransmission Line Route Alternative Along Menifee Road) has been noted.

Comment Set C36 – Melissa Mohr

Valley South Subtransmission Project

The Mohrs <mxquadfam@gmail.com>

Mon 3/14/2016 10:36 PM

To:Valley-South- Project <Valley-South-Project@aspeneg.com>;

Dear Sir/Madam:

I am a property owner residing in the Vista Del Valle II community located along Leon Road. I attended the CPUC public meeting in February regarding the Valley South Subtransmission Project. After learning more about this proposed project, I think the best option would be to install the utilitiy lines underground where the Vista Del Valle and Spencers Crossing neighborhoods are located along Leon Road. This option would satisfy the needs of Southern California Edison while significantly reducing the impact to property values and visual resources within the neighborhoods. **C36-1**

Peace,
Melissa Mohr

Mailing address: PO BOX 231 Murrieta CA 92564
Property address: 31106 Quail Garden Court Winchester, CA 92596
Phone number: (951)760-5392

Responses to Comment Set C36

C36-1 Your preference for Alternative 2 (Partial Underground Alternative) has been noted.

Comment Set C37 – Ednalyn Kerr

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3/01/2016 **Please Print**

Name*: Ednalyn Kerr

Affiliation (If any):* Resident in close proximity to proposed project.

Address:* 31016 Pinon Pine Circle

City, State, Zip Code:* Winchester, Ca. 92596

Telephone Number:* 760-799-0757 **Email:*** ednalynk@yahoo.com

Comment: We do not want or agree to the Valley South Subtransmission pole project proposed to proceed along Leon road. Acceptable alternatives would be no project at all or at the very least to bury the transmission lines underground out of sight. **C37-1**

We as residents in this community have not been properly notified of this project and is not something we agree to. **C37-2**

*Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.

Responses to Comment Set C37

C37-1 Your opposition to the proposed Project has been noted, as well as your preference for Alternative 3 (No Project Alternative) or at least Alternative 2 (Partial Underground Alternative), if the Project is approved.

C37-2 Under California Environmental Quality Act (CEQA) Guidelines Section 15087(a), Public Review of Draft EIR, the Lead Agency (California Public Utilities Commission [CPUC]) must provide notice of the availability of the Draft EIR to the last known name and address of all organizations and individuals who have previously requested such notice in writing, and by at least one of the following procedures: (1) publication at least one time in a newspaper of general circulation in the area affected by the proposed project or in the newspaper of largest circulation from among the newspapers of general circulation (if more than one area), (2) posting on and off the site in the area where the project would be located, *or* (3) direct mailing to the owners and occupants of property contiguous to the parcels on which the project would be located based on the latest equalized assessment roll. Additionally, under CEQA Guidelines Section 15087(d), the Notice of Availability (NOA) shall also be posted in the office of the county clerk of each county in which the project is located.

A NOA letter for the Draft EIR was mailed to over 130 interested parties (CEQA Guidelines §15087(a)), which included individuals who had previously commented on the Project during the scoping period (May 5, 2015 to June 8, 2015), and a NOA postcard was mailed to over 625 residences located within 300 feet of the proposed and alternative alignments (CEQA Guidelines §15087(a)(3)). Additionally, newspaper notices were placed in The Press-Enterprise on January 30, 2016 and February 12, 2016, The Californian (An Edition of the UT San Diego) on February 12, 2016, and The Anza Valley Outlook on February 19, 2016 (CEQA Guidelines §15087(a)(1)). These notices included information on the proposed Project, where to obtain information on the Draft EIR, and details regarding the public meeting. As such, the notification for the Valley South Subtransmission Project meets and exceeds the regulatory requirements under CEQA.

Furthermore, all those who signed-in during the public meeting held on February 22, 2016 and those who submitted comments on the Draft EIR have been added to the Project mailing list to receive all future CEQA-related Project communications.

The CPUC is the public agency with the principal responsibility for approving or denying the Project, and as such is the Lead Agency under CEQA. CEQA requires the Lead Agency to consider the information contained in the EIR, including these comments, prior to taking any discretionary action. The EIR serves as an informational document to be considered by the CPUC and other permitting agencies during deliberations on the Project. The CPUC will consider approval of the Permit to Construct (PTC), and recommend a decision. The CPUC has the final decision on the PTC.

Comment Set C38 – Jerred DeJang

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3/01/2016 **Please Print**

Name*: Jerred DeJang

Affiliation (If any):* Resident in close proximity to proposed project.

Address:* 31229 Euclid loop

City, State, Zip Code:* Winchester, Ca. 92596

Telephone Number:* (951)961-9759 **Email:*** Jerreddejong@yahoo.com

Comment: We do not want or agree to the Valley South Subtransmission pole project proposed to proceed along Leon road. C38-1

Acceptable alternatives would be no project at all or at the very least to bury the transmission lines underground out of sight.

We as residents in this community have not been properly notified of this project and is not something we agree to. C38-2

**Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.*

Responses to Comment Set C38

C38-1 This letter is identical to Comment Set C37. Please see responses to Comment Set C37.

Comment Set C39 – Melinda Hosley

From: Melinda Y Hosley <auntshorty62@aol.com>
Sent: Monday, March 14, 2016 4:06 PM
To: Valley-South- Project
Subject: Opposition to Overhead Utilities

To whom it may concern:

My Name is Melinda Hosley I am a Spencers Crossing resident
30905 Prairie Sun Way. I have lived here for 4yrs. I was the second owner in my housing track. At the time of purchasing my home I looked for homes that did not have any overhead utilities. Why? For so many reasons but I will list just a few. The View and Appearance of the Property, The Property Value, I never would have purchased this home had there been overhead utilities. Makes the property look terribly undesirable and Last and Most importantly Health concerns. I am a 20yr US Army (Retired) Veteran with Multiple Sclerosis and I have read data on those utility lines. Why put people at risk. Why are you going back in time. I urge you to Put those utilities underground. Protect our Property Value Protect Our Residents Health. Do the right thing. Put the utilities underground. **C39-1**
Thank you
Melinda Y Hosley

Sent from my iPhone

Responses to Comment Set C39

C39-1 Your opposition to the proposed Project has been noted, as well as your preference for Alternative 2 (Partial Underground Alternative), if the Project is approved.

The effect of the Project on property values is not an environmental topic analyzed under the California Environmental Quality Act (CEQA).

Recognizing that there is public interest and concern regarding potential health effects that could result from exposure to electric and magnetic fields (EMF) from power lines, the EIR provides information regarding EMF associated with electric utility facilities and the potential effects of the proposed Project related to public health and safety in EIR Section B.6. (Electric and Magnetic Fields Management). Additionally, SCE provided a Field Management Plan as Appendix F of the Application, which includes calculated magnetic field levels for the proposed Project. SCE's Application is provided on the CPUC's Project website noted below.

http://www.cpuc.ca.gov/environment/info/aspen/valleysouth/ValleySouth.htm

Comment Set C40 – Nahid Behnawa and Mohammad Abbass

CALIFORNIA PUBLIC UTILITIES COMMISSION

Public Comments on Draft EIR

Valley South Subtransmission Project

Date: 3/01/2016 **Please Print**

Name*: NAHID BEHNAWA, MOHAMMAD ABBASS

Affiliation (If any):* Resident in close proximity to proposed project.

Address:* 31003 Janelle Ln

City, State, Zip Code:* Winchester, Ca. 92596

Telephone Number:* 619-977-9169 **Email:*** mabbassi@Live.Com

Comment: We do not want or agree to the Valley South Subtransmission pole project proposed to proceed along Leon road. Acceptable alternatives would be no project at all or at the very least to bury the transmission lines underground out of sight. C40-1

We as residents in this community have not been properly notified of this project and is not something we agree to. C40-2

*Your name, address, and comments become public information and may be printed. Please indicate if you would like this information removed.

Responses to Comment Set C40

C40-1 This letter is identical to Comment Set C37. Please see responses to Comment Set C37.

Comment Set D1 – Southern California Edison

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
Executive Summary			Please revise the Executive Summary to be consistent with any changes that are also made to the individual sections throughout the remainder of the document.	D1-1
Executive Summary	ES-5	Figure ES-2 	Figure ES-2 states that there are 19 guy stub poles. Please revise the call out to reflect the correct number of guy stub poles to 14.	D1-2
A.3.1	A-4	"The ALJ's Decision, and the Evidentiary Hearings, will cover issues of Project need, Project cost, and other considerations."	SCE has applied for a Permit to Construct (PTC), and under GO 131-D, PTC cases typically do not involve assessments of "need" or cost." GO 131-D, Section IX.B.1.f. says, "an application for a permit to construct need not include either a detailed analysis of purpose or necessity, a detailed estimate of the cost and analysis...beyond that required for CEQA compliance". Further, as noted in Decision 94-06-014, which adopted General Order 131-D: "The process we adopt for lines between 50 and 200 kV differs from the review that results in the issuance of a (CPCN) for lines over 200 kV. The process will result in a 'permit to construct' and our review will focus solely on environmental concerns (emphasis added), unlike the CPCN process which considers the need for and the economic cost of a proposed facility." "Because the (PTC) review focuses solely on environmental issues, the Commission, on the advice of Commission staff, shall issue or deny a permit as soon as it may legally do so following completion of the requisite CEQA review." "(The Energy Division of the CPUC) in conjunction with other parties developed a (PTC) procedure for power lines designed to operate between 50 and 200 kV. The (PTC) review is meant strictly for environmental review, not economic or 'needs' review." For these reasons, SCE recommends that the language in the DEIR be modified as follows: "The ALJ's Decision, and the Evidentiary Hearings, will cover a range of issues to be identified in a scoping memorandum to be issued by the CPUC~~issues of Project need, Project cost, and other considerations~~."	D1-3

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
A.3.2	A-4	The last paragraph on page A-4 states: "the CPUC's General Order 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize Project conflicts with local land use requirements."	SCE would like to clarify that GO 131-D at page 13 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. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters*" and for less than 50 kV facilities GO 131-D at page 3 states "*to ensure safety and compliance with local building standards, the utility must first communicate with, and obtain the input of, local authorities regarding land use matters and obtain any non-discretionary local permits required for the construction and operation of these projects.*" The proposed Project involves greater than 50 kV facilities. Therefore, SCE recommends that the language be revised as follows: "the CPUC's General Order 131-D requires SCE to consult with local agencies regarding ~~comply with local building, design, and safety standards to the greatest degree feasible to minimize Project conflicts with~~ local land use requirements and obtain the input of, local authorities regarding land use matters and obtain any non-discretionary local permits required for the construction and operation."	D1-4
Introduction	A-5	Table A-1 California SWRCB | Required for projects with over 1 acre of ground disturbance	Please revise Table A-1 accordingly per Clean Water Act (CWA) Regulations: "Required for projects with ~~over~~ 1 acre or greater of ground disturbance"	D1-5
B.2	B-1	Last sentence in paragraph: "Along this segment of the proposed Project, referred to as Segment 1, approximately 12 miles of new 115-kV subtransmission line would be installed on a combination of existing and new single-circuit and double-circuit wood poles and lightweight steel (LWS) poles."	Tubular steel poles are also within Segment 1 and was added to more accurately reflect all structure types. Therefore, SCE recommends that the language be revised as follows: "Along this segment of the proposed Project, referred to as Segment 1, approximately 12 miles of new 115-kV subtransmission line would be installed on a combination of existing and new single-circuit and double-circuit wood poles, ~~and~~ lightweight steel (LWS) poles~~.~~ and tubular steel poles (TSPs)."	D1-6
B.3.1.2	B-3	Figure B-1 "TSP Concrete Foundation-Approximate Auger Diameter (feet) 5 to 3"	Figure B-1 contained a typo that required correction in order to match the information supplied in the PEA; as such, correction from "3" to "9" has been requested. "TSP Concrete Foundation-Approximate Auger Diameter (feet) 5 to ~~3~~9"	D1-7

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
B.3.1.2	B-5	Figure B-1  	Figure B-1 states that there are 19 guy stub poles. Please revise the call out to reflect the correct number of guy stub poles to 14.	D1-8
B.3.3	B-17	**"B.3.3 Distribution"**	In order to clarify the distribution scope, please add the following footnote: **"B.3.3 Distribution[1]"** [1]The distribution scope of work is based on preliminary engineering actual scope and quantities will be determined once final engineering is performed following project approval."	D1-9
B.4.5.1	B-29	"Construction of the proposed Project would disturb a surface area greater than one acre. Therefore, SCE would be required to obtain coverage under the Statewide Construction General Permit (Order No. 2009-0009-DWQ)....."	Please revise accordingly per updated Construction General Permit amendments: "Construction of the proposed Project would disturb a surface area greater than one acre. Therefore, SCE would be required to obtain coverage under the Statewide Construction General Permit for Storm Water Discharges (Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ)....."	D1-10
B.4.6.1	B-31	The first paragraph under Pull and Tension Sites: "The pulling, tensioning, and splicing set-up locations associated with the proposed Project would be temporary, and the land would be restored to its previous condition following completion of pulling and splicing activities."	Please note that as with the areas temporarily impacted by construction as described in the first paragraph following Clean up and Post-Construction Restoration on page B-30, these areas "would be cleaned up and restored to as close to pre-construction conditions as feasible, or to the conditions agreed upon between the landowner and SCE following the completion of construction." Therefore, SCE recommends that the language be revised as follows: "The pulling, tensioning, and splicing set-up locations associated with the proposed Project would be temporary, and the land ~~would be restored to its previous condition~~ would be cleaned up and restored to as close to pre-construction conditions as feasible, or to the conditions agreed upon between the landowner and SCE following completion of pulling and splicing activities."	D1-11
B.4.8.1	B-41	Second paragraph, second sentence: "The decision as to use of guard structures verses boom trucks would be determined during construction."	The word 'verses' should be replaced with 'versus': "The decision as to use of guard structures ~~verses~~ versus boom trucks would be determined during construction."	D1-12

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
B.4.11	B-44	Second paragraph, second sentence: "Contractor construction personnel would be managed by SCE construction management personnel and based out of the contractor's existing yard, an SCE's substation, or temporary material staging yard set up for the proposed Project."	To allow for the option of contractors managing construction personnel, and to clarify that contractors would not be based out of an SCE substation, SCE recommends that the language be revised as follows: "Contractor construction personnel would be managed by SCE ~~construction management personnel~~ and/or contractor personnel, and would be based out of the contractor's existing yard~~, an SCE's substation,~~ or potential temporary material staging yard set up for the proposed Project."
B.6.3	B-57	Table B-17 presents both the "Proposed without EMF Reduction" and "Proposed with EMF Reduction" levels in two sets of columns.	SCE did not include the analysis for "Proposed without EMF Reduction" design options in the FMP, however, upon receipt of the DEIR has performed the calculations and provided them in the table below. SCE suggests updating the two columns of "Proposed without EMF Reduction: Edge of ROW (mG)" in Table B-17 using the levels provided in the table below:

Table B-17. Calculated Magnetic Field Levels along Proposed 115 kV Transmission Corridor

Segment	Proposed without EMF Reduction: Edge of ROW (mG)	Proposed with EMF Reduction: Edge of ROW (mG)	Proposed without EMF Reduction: Edge of ROW (mG)	Proposed with EMF Reduction: Edge of ROW (mG)
Section 1	28.8	24.8	14.7	8.5
Section 2	**33.5**	15.6	**35.1**	14.8
Section 3	**26.3**	11.0	**28.7**	13.6
Section 4	**N/A**	30.5	**N/A**	29.5
Section 5	**30.2**	13.2	**33.0**	15.7

D1-13

D1-14

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
B.7	B-60	**Table B-18. Applicant Proposed Measures (APMs)** **APM BIO-6:** **"Burrowing Owl Preconstruction Surveys and Monitoring** – A preconstruction non-protocol burrowing owl survey shall be conducted no more than 30 days prior to commencement of ground-disturbing activities within suitable habitat to determine if any occupied burrows are present. SCE would establish a buffer area around active nest(s) and would monitor construction activities. If occupied burrows or other evidence of presence are found, adequate buffers shall be established around burrows. Adequate buffers shall be 160 feet from occupied wintering burrows (December 1 through January 31) and 250 feet from occupied breeding burrows during the breeding season (February 1 through August 31). A qualified avian specialist may increase or reduce these buffer distances on a case-by-case basis. Biologists shall monitor all construction activities that have the potential to impact active burrows. In addition, potential unavoidable impacts to burrowing owl and its habitat shall be mitigated by participation in the WRCMSHCP. SCE's participation, as a PSE, shall include following the provisions and measures outlined in the WRCMSHCP. All reporting requirements would be conducted as described in APMs BIO-1 and BIO-2."	SCE is proposing the following revision to APM BIO-6 to clarify SCE's position as a PSE within the WRCMSHCP. The MSHCP recognizes "coverage" of species under the planning process as equivalent to adequate, long-term conservation of those species anticipated under full implementation of the MSHCP, which is also designed to account for integrated human development on the landscape. Participation in the MSHCP, and application of BMPs (Appendix C of the MSHCP), Construction Guidelines (MSHCP Section 7.5.3), and MMs specific to species have been incorporated in the MSHCP and will be implemented as part of the Proposed Project as a PSE of the MSHCP, and will ensure that Project construction proceeds with no significant impacts to sensitive biological resources. ~~**"Burrowing Owl Preconstruction Surveys and Monitoring –** A preconstruction non-protocol burrowing owl survey shall be conducted no more than 30 days prior to commencement of ground-disturbing activities within suitable habitat to determine if any occupied burrows are present. SCE would establish a buffer area around active nest(s) and would monitor construction activities. If occupied burrows or other evidence of presence are found, adequate buffers shall be established around burrows. Adequate buffers shall be 160 feet from occupied wintering burrows (December 1 through January 31) and 250 feet from occupied breeding burrows during the breeding season (February 1 through August 31). A qualified avian specialist may increase or reduce these buffer distances on a case-by-case basis.~~ ~~Biologists shall monitor all construction activities that have the potential to impact active burrows. In addition, potential unavoidable impacts to burrowing owl and its habitat shall be mitigated by participation in the WRCMSHCP. SCE's participation, as a PSE, shall include following the provisions and measures outlined in the WRCMSHCP.~~ ~~All reporting requirements would be conducted as described in APMs BIO-1 and BIO-2~~. **Special status wildlife and plant species preconstruction surveys and Monitoring –** SCE's participation, as a PSE, shall include but is not limited to following the provisions and measures outlined in the WRCMSHCP. This includes avoidance and mitigation measures for species such as Coastal California Gnatcatcher, Burrowing Owl, Quino checkerspot butterfly, riparian bird species, vernal pool fairy shrimp and special status plants. All CPUC reporting requirements would be conducted as described in APMs BIO-1 and BIO-2."

D1-15

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

D1-16

C.2.4.2	C.2-18	***"Impact AES-3 (Criterion AES1): Construction could result in visual contrast associated with establishment of graveled surfaces. (Class II)*** Those areas of temporary disturbance where the soil surface (characterized by high color, line, and texture contrasts) is exposed and/or removed, or where lighter-colored gravel is placed could exhibit considerable color contrast with adjacent darker vegetation and soil colors. This long-term visual contrast could appear prominent from some viewing locations and cause moderate to high levels of visual change and result in a significant visual impact. Given that the proposed Project would be primarily located within an existing ROW and/or accessible by adjacent public roadways, it is anticipated that only a limited amount of ground surface disturbance and use of graveled surfaces would occur. It is also expected that, given the relatively flat terrain through which the proposed Project would pass, the need for grading would be limited. However, should ground disturbance or the establishment of graveled surfaces occur, the prominent visual contrast associated with those Project aspects can be reduced to levels that would be less than significant through effective implementation of Mitigation Measure AES-3 (*Reduce Color Contrast of Graveled Surfaces*) [Class II]." ***"Mitigation Measure for Impact AES-3*** **AES-3 Reduce color contrast of graveled surfaces.** Where construction would unavoidably introduce graveled surfaces visible from sensitive public viewing locations, the graveled surfaces shall be treated with an appropriate color or material (e.g., Natina Concentrate, Eonite, or Permeon, or similar). The colorant material shall be approved by the California Public Utilities Commission (CPUC), and the intent shall be to reduce the visual contrast created by placing the lighter-colored rock adjacent to darker soil and vegetated surroundings. Southern California Edison (SCE) shall consult with the CPUC and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants."	Application of treatments for temporary areas (disturbed soils) creates artificial blending that is less desirable at the expense of eventual natural blending. Land scars would only remain in areas used permanently and these areas are inappropriate for treatment. The mitigation measure as written is excessive. The DEIR must identify *which specific* areas will result in a potentially significant impact, not just those visible from sensitive public viewing locations, especially as sensitive viewing locations are not defined in the DEIR. The document should not simply conclude that such activities could generically cause potentially significant impacts across the entirety of the Project. SCE believes there are few, if any, areas within which construction ground disturbance and retaining will result in a potentially significant visual impact requiring mitigation. Almost all construction activities will occur in previously disturbed areas or established ROW with existing subtransmission and distribution line infrastructure, substantially reducing the potential for significant visual impacts. The PEA concludes that construction activities would not result in significant impacts to visual resources because construction activities are temporary and the proposed project includes restoration of laydown/work areas through re-contouring and revegetation at the end of construction.[1] Moreover, Mitigation Measure AES-3 improperly defers analysis of impacts to a post-approval stage. The mere fact that there *may* be some areas of potentially significant impacts does not justify a post-approval analysis for the entirety of the proposed Project. Under Mitigation Measure AES-3, SCE shall consult with the CPUC and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants, implying discretion or future analysis would be required. CEQA generally disallows deferring analysis unless it is not practical to do so in the EIR. 1. *See* CEQA Guidelines § 15126.4(a)(1)(B); *Sacramento Old City Assn. v. City Council*, 229 Cal. App. 3d 1011, 1029 (1991). In cases where mitigation measures include future analysis not included in the EIR, the mitigation measure must identify specific performance standards by which the analysis will be applied. *See* CEQA Guidelines § 15126.4(a)(1)(B). CEQA prohibits mitigation measures that simply require a developer to comply with any recommendations in a future analysis. *See Rialto Citizens For Responsible Growth v. Walmart Real Estate Business Trust*, 208 Cal. App. 4th 899, 944-945 (2012). As such, please revise the Impact AES-3 and delete the Mitigation Measure for AES-3 as follows: **(see next page)**

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.2.4.2 (cont.)			***"Impact AES-3 (Criterion AES1): Construction could result in visual contrast associated with establishment of graveled surfaces. (Class III)*** Those areas of temporary disturbance where the soil surface (characterized by high color, line, and texture contrasts) is exposed and/or removed, or where lighter-colored gravel is placed could exhibit ~~considerable~~ color contrast with adjacent darker vegetation and soil colors. This ~~long-term~~ visual contrast could appear prominent from some viewing locations and may cause low to moderate ~~to high~~ levels of visual change. ~~and result in a significant visual impact.~~ Given that the proposed Project would be primarily located within an existing ROW and/or accessible by adjacent public roadways, it is anticipated that only a limited amount of ground surface disturbance and use of graveled surfaces would occur. It is also expected that, given the relatively flat terrain through which the proposed Project would pass, the need for grading would be limited. ~~However, should~~ Although ground disturbance or the establishment of graveled surfaces will occur, the ~~prominent~~ visual contrast associated with those Project aspects ~~can be reduced to levels that~~ would be less than significant ~~through effective implementation of Mitigation Measure AES-3 (*Reduce Color Contrast of Graveled Surfaces*)~~ [Class III]." ~~***"Mitigation Measure for Impact AES-3: Construction would result in visual contrast associated with retaining walls, land scarring, and establishment of graveled surfaces***~~ ~~**AES-3 Reduce color contrast of graveled surfaces.**~~ ~~Where construction would unavoidably introduce graveled surfaces visible from sensitive public viewing locations, the graveled surfaces shall be treated with an appropriate color or material (e.g., Natina Concentrate, Eonite, or Permeon, or similar). The colorant material shall be approved by the California Public Utilities Commission (CPUC), and the intent shall be to reduce the visual contrast created by placing the lighter-colored rock adjacent to darker soil and vegetated surroundings. Southern California Edison (SCE) shall consult with the CPUC and/or their authorized representative(s) on a site-by-site basis and obtain written approval prior to the use of any colorants.~~"
C.2.4.2	C.2-25	"Furthermore, it should be noted that SCE has committed in their project description to comply with local ordinances regarding work hours, and would be limiting night work to extraordinary activities. SCE has also stated that they would provide advance notification when they need to conduct work at night."	SCE recommends that this description be slightly modified as follows to clarify that while SCE would generally comply with local work hour ordinances, some minor deviations might occur during unusual circumstances: "Furthermore, it should be noted that SCE has committed in their project description to generally comply with local ordinances regarding work hours, and would be limiting night work to extraordinary activities. SCE has also stated that they would provide advance notification when they need to conduct work at night."

D1-16 cont.

D1-17

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

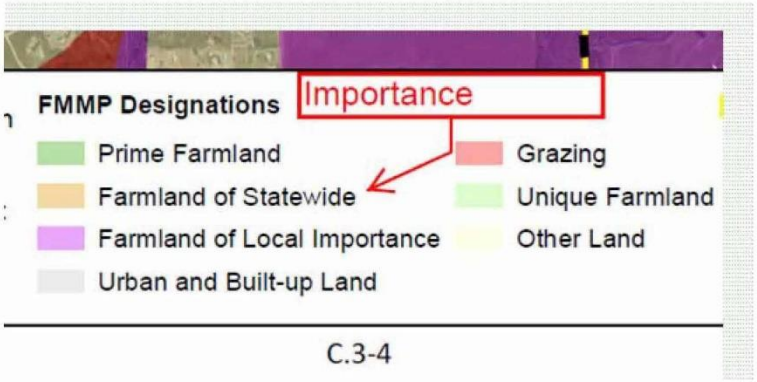
Section	Page	DEIR Language	SCE Recommendations
C.2.4.2	C.2-27	Mitigation Measure **AES-6 Treat structure surfaces** in its entirety.	SCE uses dulled light gray galvanized surfaces on steel poles, but SCE otherwise typically does not treat steel poles. SCE has found that the natural dulled light gray that the galvanize coating will reach through weathering has the best visual appearance and blends best with desert, mountain, and sky backgrounds. To reduce the potential for daytime (or nighttime) structural glare related to the new galvanized steel poles, SCE will dull (remove shine inherent with the galvanizing process) from the poles, which would effectively accomplish the intent of Mitigation Measure AES-6. SCE requests the removal of Mitigation Measure AES-6 in its entirety: "~~**AES-6 Treat structure surfaces.** Southern California Edison (SCE) shall treat the surfaces of all structures visible to the public such that: a) their colors minimize visual contrast by blending with the characteristic landscape colors; and b) their colors and finishes do not create excessive glare. SCE should consult with applicable city and county agencies regarding the colors and finishes used on project structures. The subtransmission facilities and conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive (SCE has stated in their project description that they will use non-specular 954 SAC conductors). SCE shall use appropriate colors that blend effectively with the surrounding landscape. SCE has stated in their project description that the TSPs will have a "dulled galvanized finish."~~ ~~SCE shall provide to the CPUC for review, a Surface Treatment Plan describing the materials and dulling treatment proposed along with samples of treated material. The plan shall also describe the application of any post-manufacture colors and textures to new facility structures, and explain how the overall Project design will reduce glare and minimize visual intrusion and con-trast by blending the facilities with the landscape. The plan shall be submitted to CPUC at least 60 days prior to ordering the first structures that are to be color-treated during manufacture or prior to construction of any of the facility components, whichever comes first. If the CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The Surface Treatment Plan shall include the following components and specifications.~~ • ~~Specification, and 11" x 17" color simulations at life-size scale, of the treatment proposed for use on structures, including structures treated during manufacture.~~ • ~~A list of each major structure and/or pole specifying the color(s) and finish(es) proposed for each (colors must be identified by name and by vendor brand or a universal designation).~~ • ~~Two sets of brochures and/or color chips for each proposed color.~~ • ~~A detailed schedule for completion of the treatment.~~ • ~~A procedure to ensure proper treatment maintenance for the life of the proposed Project.~~ • ~~☒ Until SCE receives notification of approval of the Surface Treatment Plan by the CPUC, SCE shall not specify to the vendors the treatment of structures for manufacture and shall not perform the final treatment on structures treated on site. Additionally, construction activities shall not start until approval of the plan from the CPUC has been received. Within 14 days following the completion of treatment on any facility component, SCE shall notify the CPUC that the component (e.g., structure) is ready for inspection."~~

D1-18

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.2.4.5	C.2-32	Table C.2-33 for impact AES-6 states: "The permanent presence of the proposed Project would result in adverse significant and unavoidable impacts at two locations where the project would be placed in a new alignment (Class I). Class I impacts could not be reduced to less-than-significant levels."	It is SCE's understanding there is only one "significant and unavoidable" location for KOP 5. Also, please remove "adverse" because the only reference where this term is used is with Adverse; less than significant. Please revise as follows: "The permanent presence of the proposed Project would result in ~~adverse~~ a significant and unavoidable impacts ~~at two~~ one location~~s~~ where the project would be placed in a new alignment (Class I). Class I impacts could not be reduced to less-than-significant levels."	D1-19
C.3.1.2	C.3-4	Figs. C.3-1a, 1b, 1c: Legend says "Farmland of Statewide"	Legend should read "Farmland of Statewide Importance"  	D1-20
C.3.1.2	C.3-4	"Prime and Prime, Non-Renewal" under Williamson Act Land do not seem to be defined in Section C.3.1.2 on p. C.3-2	Please include in Section C.3.1.2 Project Setting a definition for the Williamson Act Land Prime and Williamson Act Prime, Non-Renewal	D1-21
C.3.4.1	C.3.10	The third bulleted item states: "• Criterion AG3: The proposed Project would conflict with existing zoning for agricultural use, or Williamson Act contract, or Agricultural Preserve."	Since the construction and maintenance of electrical transmission and communication facilities are recognized as compatible uses within any agricultural preserve pursuant to California Government Code 51238(a)(1), such activities are not a significant impact within an agricultural preserve and therefore a mitigation measure is not required for impacts that are less than significant. The text should be revised to be consistent with the CEQA Guidelines as follows: "• Criterion AG3: The proposed Project would conflict with existing zoning for agricultural use~~,~~ or Williamson Act contract~~, or Agricultural Preserve~~."	D1-22

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.3.4.2	C.3.12	Mitigation Measure AG-1 states: "Coordinate with Agricultural Landowners. Southern California Edison (SCE) shall coordinate with potentially affected property owners of Farmland (Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland) and Agricultural Preserve lands to reduce disruption to agricultural operations during construction of the proposed Project. ... ... SCE shall document its coordination efforts with affected agricultural landowners regarding the continued use of Farmland and Agricultural Preserves, and shall submit this documentation to the California Public Utilities Commission at least 30 days prior to the start of any construction activities on the affected agricultural parcels."	Since the construction and maintenance of electrical transmission and communication facilities are recognized as compatible uses within any agricultural preserve pursuant to California Government Code 51238(a)(1), such activities are not a significant impact within an agricultural preserve and therefore a mitigation measure is not required for impacts that are less than significant. The paragraphs should be revised to state: "Coordinate with Agricultural Landowners. Southern California Edison (SCE) shall coordinate with potentially affected property owners of Farmland (Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland) ~~and Agricultural Preserve lands~~ to reduce disruption to agricultural operations during construction of the proposed Project. ... ... SCE shall document its coordination efforts with affected agricultural landowners regarding the continued use of Farmland ~~and Agricultural Preserves~~, and shall submit this documentation to the California Public Utilities Commission at least 30 days prior to the start of any construction activities on the affected agricultural parcels."	D1-23
C.3.4.2	C.3.12	The text after the heading Impact AG-3 (Criterion AG3): states: "The Project could conflict with land under Agricultural Preserves. (Class II)"	Since the construction and maintenance of electrical transmission and communication facilities are recognized as compatible uses within any agricultural preserve pursuant to California Government Code 51238(a)(1), such activities are not a significant impact within an agricultural preserve and therefore a mitigation measure is not required for impacts that are less than significant. The text should be revised to state: "The Project does not ~~could~~ conflict with land under Agricultural Preserves. (Class II)"	D1-24

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.3.4.2	C.3-12	**Mitigation Measures for Impact AG-1** states: "**Coordinate with Agricultural Landowners.** Southern California Edison (SCE) shall coordinate with potentially affected property owners of Farmland (Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland) and Agricultural Preserve lands to reduce disruption to agricultural operations during construction of the proposed Project. This coordination shall include: • Scheduling construction activities at a location and time when conflict with agricultural operations will be minimized, and avoiding construction during peak planting, growing, and harvest seasons, if feasible, based on outage limitations; and • Ensuring that any damaged or disturbed Farmland is restored to a condition that closely approximates conditions that existed prior to construction-related disturbance, to the extent practicable. This could include activities such as soil preparation, regrading, and reseeding. SCE shall document its coordination efforts with affected agricultural landowners regarding the continued use of Farmland and Agricultural Preserves, and shall submit this documentation to the California Public Utilities Commission at least 30 days prior to the start of any construction activities on the affected agricultural parcels."	For clarification regarding coordination with Agricultural Landowners for the Proposed Project, SCE recommends that the language be revised as follows:: "**Coordinate with Agricultural Landowners.** Southern California Edison (SCE) shall coordinate with potentially affected property owners of Farmland (Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland) and Agricultural Preserve lands to reduce disruption to agricultural operations during construction of the proposed Project. This coordination shall include: • Scheduling construction activities at a location and time when conflict with agricultural operations will be minimized, and avoiding construction during peak planting, growing, and harvest seasons, if feasible, based on outage limitations; and <u>SCE shall use best efforts to schedule construction activities to avoid peak planting, growing, and harvest seasons, as feasible and in coordination with the property owner.</u> • Ensuring that any damaged or disturbed Farmland is restored to a condition that closely approximates conditions that existed prior to construction-related disturbance, <u>and/or as agreed upon between SCE and the property owner and also in accordance with the existing easement language,</u> to the extent practicable. This could include activities such as soil preparation, regrading, and reseeding. SCE shall document its coordination efforts with affected agricultural landowners regarding the continued use of Farmland and Agricultural Preserves, and shall submit this documentation to the California Public Utilities Commission at least 30 days prior to the start of any construction activities on the affected agricultural parcels."	D1-25
C.3.4.2	C.3.13	The first full sentence states: "This measure includes landowners with Agricultural Preserves; therefore, this impact would be less than significant with implementation of Mitigation Measure AG-1 (Class II)."	Since the construction and maintenance of electrical transmission and communication facilities are recognized as compatible uses within any agricultural preserve pursuant to California Government Code 51238(a)(1), such activities are not a significant impact within an agricultural preserve and therefore a mitigation measure is not required for impacts that are less than significant. The text should be revised to state: "This measure <u>does not include</u> ~~includes~~ landowners with Agricultural Preserves; therefore, this impact would be less than significant with implementation of Mitigation Measure AG-1 (Class II)."	D1-26

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.3.4.2	C.3.13	The first full paragraph states: **"Impact AG-4 (Criterion AG3): The Project could result in the conversion of land under Agricultural Preserves to a non-agricultural use. (Class III)** In the approximately 5.2 miles of Agricultural Preserves traversed by the proposed Project, 64 poles would be constructed, which would result in the permanent conversion of approximately 0.79 acre of land under Agricultural Preserves to a non-agricultural uses. The components that would cause this conversion are as follows: • Two TSPs and 31 wood poles would result in 0.43 acre of land within the Winchester Agricultural Preserve permanently converted to a non-agricultural use; and • One TSP, 19 LWS poles, and 11 wood poles would result in 0.36 acre of land within the Murrieta Hot Springs Agricultural Preserve permanently converted to a non-agricultural use. The permanent conversion of Agricultural Preserve lands would be a total of 0.79 acre, which is a negligible loss. The total permanent disturbance area of Farmland (0.79 acres) is less than the minimum area necessary for sustainable agriculture. Therefore, the conversion of 0.79 acre of Agricultural Preserve lands would be adverse, but less than significant (Class III)."	Since the construction and maintenance of electrical transmission and communication facilities are recognized as compatible uses within any agricultural preserve pursuant to California Government Code 51238(a)(1), such activities are not a significant impact within an agricultural preserve and therefore a mitigation measure is not required for impacts that are less than significant. The text should stricken. "~~**Impact AG-4 (Criterion AG3): The Project could result in the conversion of land under Agricultural Preserves to a non-agricultural use. (Class III)**~~ ~~In the approximately 5.2 miles of Agricultural Preserves traversed by the proposed Project, 64 poles would be constructed, which would result in the permanent conversion of approximately 0.79 acre of land under Agricultural Preserves to a non-agricultural uses. The components that would cause this conversion are as follows:~~ ~~• Two TSPs and 31 wood poles would result in 0.43 acre of land within the Winchester Agricultural Preserve permanently converted to a non-agricultural use; and~~ ~~• One TSP, 19 LWS poles, and 11 wood poles would result in 0.36 acre of land within the Murrieta Hot Springs Agricultural Preserve permanently converted to a non-agricultural use.~~ ~~The permanent conversion of Agricultural Preserve lands would be a total of 0.79 acre, which is a negligible loss. The total permanent disturbance area of Farmland (0.79 acres) is less than the minimum area necessary for sustainable agriculture. Therefore, the conversion of 0.79 acre of Agricultural Preserve lands would be adverse, but less than significant (Class III).~~"

D1-27

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.3.4.2	C.3.14	Criterion AG3 states: "**Criterion AG3: The proposed Project would conflict with existing zoning for agricultural use, or Williamson Act contract, or Agricultural Preserve.** Implementation of the proposed Project would result in conflicts with Agricultural Preserves that are adverse, but less than significant (Impact AG-3). Conflicts with Agricultural Preserves could result from the construction of other projects in close proximity to the proposed Project. However, as noted under Impact AG-2, it does not appear that agricultural operations are widespread near the Project corridor. In addition, with implementation of Mitigation Measure AG-1, the proposed Project's incremental contribution to this impact would not be cumulatively considerable (Class II). Similarly, the conversion of Agricultural Preserves under the proposed Project would be (Impact AG-4). As noted above, the Project area appears to be under development with new housing projects. The conversion of Agricultural Preserves could occur if the cumulative projects are built. However, the proposed Project's incremental contribution to this impact would not be cumulatively considerable negligible because it would be placed primarily within an existing utility corridor, and the area needed for the new ROW would not directly impact Prime Farmland (Class III)."	Since the construction and maintenance of electrical transmission and communication facilities are recognized as compatible uses within any agricultural preserve pursuant to California Government Code 51238(a)(1), such activities are not a significant impact within an agricultural preserve and therefore a mitigation measure is not required for impacts that are less than significant. Criterion AG3 should be revised to state: "**Criterion AG3: The proposed Project would conflict with existing zoning for agricultural use~~,~~ or Williamson Act contract, or Agricultural Preserve.** Implementation of the proposed Project would not result in conflicts with Agricultural Preserves that are adverse since the construction and maintenance of electrical transmission and communication facilities are recognized as compatible uses within any agricultural preserve pursuant to California Government Code 51238(a)(1)~~, but less than significant (Impact AG-3)~~. Conflicts with Agricultural Preserves could result from the construction of other projects in close proximity to the proposed Project. However, as noted under Impact AG-2, it does not appear that agricultural operations are widespread near the Project corridor. In addition, with implementation of Mitigation Measure AG-1, the proposed Project's incremental contribution to this impact would not be cumulatively considerable (Class II). ~~Similarly, the conversion of Agricultural Preserves under the proposed Project would be (Impact AG-4).~~ As noted above, the Project area appears to be under development with new housing projects. The conversion of Agricultural Preserves could occur if the cumulative projects are built. However, the proposed Project~~'s~~ has no incremental contribution to this impact ~~would not be cumulatively considerable negligible because it would be placed primarily within an existing utility corridor~~, and the area needed for the new ROW would not directly impact Prime Farmland (Class III)."

D1-28

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.3.4.2	C.3.15	Table C.3.4 states: **Table C.3-4. Impact and Mitigation Summary – Agricultural Resources** **Impact** / **Significance Conclusion** / **Reason for Conclusion** **AG-1**: Operation of the Project could permanently convert Farmland to a non-agricultural use. — Class III — The permanent conversion of 5.92 acres of Farmland to a non-agricultural use under the proposed Project would be considered adverse, but not significant. **AG-2**: Construction activities associated with the Project could interfere with agricultural operations. — Class II — Construction activities could result in temporary disruptions to agricultural activities and could result in reductions of agricultural productivity in the area. Implementation **of Mitigation Measure AG-1** (*Coordinate with Agricultural Landowners*) is recommended to reduce construction impacts to agricultural operations. **AG-3**: The Project could conflict with land under Agricultural Preserves. — Class II — Disruptions to agricultural activities, would be mitigated through implementation of **Mitigation Measure AG-1** (*Coordinate with Agricultural Landowners*). **AG-4**: The Project could result in the conversion of land under Agricultural Preserves to a non-agricultural use. — Class III — The conversion of Agricultural Preserve lands would be adverse, but less than significant.	Since the construction and maintenance of electrical transmission and communication facilities are recognized as compatible uses within any agricultural preserve pursuant to California Government Code 51238(a)(1), such activities are not a significant impact within an agricultural preserve and therefore a mitigation measure is not required for impacts that are less than significant. Table C.3.4 should be revised to state: **Table C.3-4. Impact and Mitigation Summary – Agricultural Resources** **Impact** / **Significance Conclusion** / **Reason for Conclusion** **AG-1**: Operation of the Project could permanently convert Farmland to a non-agricultural use. — Class III — The permanent conversion of 5.92 acres of Farmland to a non-agricultural use under the proposed Project would be considered adverse, but not significant. **AG-2**: Construction activities associated with the Project could interfere with agricultural operations. — Class II — Construction activities could result in temporary disruptions to agricultural activities and could result in reductions of agricultural productivity in the area. Implementation **of Mitigation Measure AG-1** (*Coordinate with Agricultural Landowners*) is recommended to reduce construction impacts to agricultural operations. **AG-3**: The Project does not ~~could~~ conflict with land under Agricultural Preserves. — Class II — Disruptions to agricultural activities, would be mitigated through implementation of **Mitigation Measure AG-1** (*Coordinate with Agricultural Landowners*). ~~**AG-4**: The Project could result in the conversion of land under Agricultural Preserves to a non-agricultural use.~~ — ~~Class III~~ — ~~The conversion of Agricultural Preserve lands would be adverse, but less than significant.~~

D1-29

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.4.1.2	C.4-6	First paragraph second sentence: "This includes schools, playgrounds, daycare centers, retirement homes, rehabilitation and convalescent centers, hospitals, and residences."	Please include "athletic facilities" to the DEIR as it is included in CEQA templates as a sensitive receptor. "This includes schools, playgrounds, athletic facilities, daycare centers, retirement homes, rehabilitation and convalescent centers, hospitals, and residences."	D1-30
C.4.4	C.4-11	Under the discussion of C.4.4 Environmental Impacts and Mitigation Measures, the last sentence in the discussion paragraph states: "Appendix 3 (Air Quality Emissions Calculations) includes the revised emissions calculations that address all changes requested by the CPUC."	Please revise to reflect Appendix 2, as Appendix 3 refers to the Biological Resources: "Appendix ~~3~~2 (Air Quality Emissions Calculations) includes the revised emissions calculations that address all changes requested by the CPUC."	D1-31
C.4.4.1	C.4-12	Under the discussion of C.4.4.1 Criteria for Determining Significance, the last sentence in the third paragraph states: "The closest distance to a receptor from the currently proposed marshalling yards is unclear and could be as low as 30 meters (98 feet) or as high as 60 meters (197 feet), but since there is the potential for new marshalling yards to be proposed closer to residences, the minimum LST table distance of 25 meters (82 feet) is assumed in the analysis."	SCE recommends deleting the reference to "unclear" as the remaining text provides a conservative analysis to the minimum LST table distance of 25 meters: "The closest distance to a receptor from the currently proposed marshalling yard is ~~unclear and could be as low as 30 meters (98 feet) or as high as~~ 60 meters (197 feet), but since there is the potential for new marshalling yards to be proposed closer to residences, the minimum LST table distance of 25 meters (82 feet) is assumed in the analysis."	D1-32
C.4.4.2	C.4-13	The third paragraph under the discussion of Impact AQ-1, states: "The 2007 AQMP assumes growth that is consistent with the implementation of this Project and is designed in response to existing and projected growth and demand. Therefore, the proposed Project would not exceed the future growth projections in the 2007 AQMP, and it would not conflict with or obstruct implementation of the SIP. As a result, construction of the proposed Project would conform to the applicable AQMP; thus, impacts would be less than significant and no mitigation is required."	SCE recommends referring to the applicable 2012 Final AQMP: "The ~~2007~~2012 AQMP assumes growth that is consistent with the implementation of this Project and is designed in response to existing and projected growth and demand. Therefore, the proposed Project would not exceed the future growth projections in the ~~2007~~2012 AQMP, and it would not conflict with or obstruct implementation of the SIP. As a result, construction of the proposed Project would conform to the applicable AQMP; thus, impacts would be less than significant and no mitigation is required."	D1-33
C.4.4.2	C.4-14	Under Table C.4-8. Maximum Daily Construction Emissions (lbs/day), the source is listed as: "Source: Appendix 3, SCE 2015 (as corrected); SCAQMD, 2015e."	Please revise to reflect Appendix 2, as Appendix 3 refers to the Biological Resources so that it reads: "Source: Appendix ~~3~~2, SCE 2015 (as corrected); SCAQMD, 2015e."	D1-34

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.4.4.2	C.4-15	Under Table C.4-9. Maximum Daily Controlled Construction Emissions (lbs/day), the source is listed as: "Source: Appendix 3, SCE 2015 (as corrected); SCAQMD, 2015e."	Please revise to reflect Appendix 2, as Appendix 3 refers to the Biological Resources: "Source: Appendix ~~3~~2, SCE 2015 (as corrected); SCAQMD, 2015e."	D1-35
C.4.4.2	C.4-15	Mitigation Measure AQ-1 states in the 5th bullet: "• Unpaved roads (including the portions of unpaved public roads in use by Project vehicles) when being used by Project vehicles, active construction areas, storage piles, and other disturbed areas shall be watered or chemical/organic stabilizers/suppressants applied at least three times per day or at a greater frequency necessary to limit visible dust emissions."	As currently written, the measures listed in Mitigation Measures AQ-1 would be implemented as part of the Fugitive Dust Control Plan at all times despite days or instances when certain measures may be unnecessary. Therefore to provide greater flexibility, it is recommended that the 5th bullet in MM AQ-1 be revised as follows: "• Unpaved roads (including the portions of unpaved public roads in use by Project vehicles) when being used by Project vehicles, active construction areas, storage piles, and other disturbed areas shall be watered or chemical/organic stabilizers/suppressants applied ~~at least~~ three times per day or ~~at a greater frequency~~ as necessary to limit visible dust emissions."	D1-36
C.5.1.4	C.5-9	Table C.5-2 **Table C.5-2. Acreage of Federal and State Jurisdictional Waters, Wetlands, and CDFW Jurisdictional Habitat in the Survey Area** **Jurisdictional Feature Type** / **Approximate Acres** USACE/RWQCB Waters and Wetlands (Federally Jurisdictional) – Non-wetland Waters of the U.S. – 2.32 USACE/RWQCB Waters and Wetlands (Federally Jurisdictional) – Wetlands – 13.61 RWQCB* Waters and Wetlands (State Jurisdictional) – Jurisdictional Waters – 2.94 RWQCB* Waters and Wetlands (State Jurisdictional) – Wetlands – 1.42 CDFW Jurisdictional Habitat – 25.58 * The VSSP occurs in jurisdictional areas for both the San Diego and Santa Ana Regional Water Quality Control Boards.	The jurisdictional areas identified in DEIR Table C.5-2 are incorrect. They are not consistent with the acreages provided in Tables 4.4-3, 4.4-4, 4.4-5 and 4.4-6 of the VSSP PEA. The incorrect acreages displayed in Table C.5-2 of the DEIR have been replaced with the correct values. Therefore, SCE is recommending the following changes: **Table C.5-2. Acreage of Federal and State Jurisdictional Waters, Wetlands, and CDFW Jurisdictional Habitat in the Survey Area** **Jurisdictional Feature Type** / **Approximate Acres** USACE/RWQCB Waters and Wetlands (Federally Jurisdictional) – Non-wetland Waters of the U.S. – ~~2.32~~ 1.10 USACE/RWQCB Waters and Wetlands (Federally Jurisdictional) – Wetlands – ~~13.61~~ 9.61 RWQCB* Waters and Wetlands (State Jurisdictional) – Jurisdictional Waters – ~~2.94~~ 1.17 RWQCB* Waters and Wetlands (State Jurisdictional) – Wetlands – ~~1.42~~ 1.33 CDFW Jurisdictional Habitat – ~~25.58~~ 14.48 * The VSSP occurs in jurisdictional areas for both the San Diego and Santa Ana Regional Water Quality Control Boards.	D1-37
C.5.1.4	C.5-11	Third full paragraph: "Several exotic species including the brown-headed cow bird (*Molothrus ater*), House sparrow (*Passer domesticus*) and feral pigeon or rock dove (*Columba livia*) were also observed."	Brown headed cowbirds are a native parasitic species. SCE recommends removing the reference from this sentence as follows: "Several exotic species including the ~~brown-headed cow bird (*Molothrus ater*),~~ House sparrow (*Passer domesticus*) and feral pigeon or rock dove (*Columba livia*) were also observed."	D1-38

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.1.4	C.5-24	First full paragraph: "Protocol surveys for southwestern willow flycatcher, federally and State endangered and a MSHCP covered species, were conducted in both 2012 and 2014; no southwestern willow flycatchers were detected during the surveys. A single willow flycatcher (*Empidonax traillii*), State listed as endangered, was detected within a stand of ornamental trees at the entrance to a private residence, just south of Auld Road, in the Survey Area in 2014."	Willow flycatcher (*Empidonax traillii*), is not a listed species, however **southwestern Willow Flycatcher (*Empidonax traillii extimus*)** is the state listed species. The observed bird was likely a migrant and therefore a willow flycatcher, thus SCE recommends the following change. Additionally, SCE recommends that the listing status of willow flycatcher be corrected in table C5-5. "Protocol surveys for southwestern willow flycatcher, federally and State endangered and a MSHCP covered species, were conducted in both 2012 and 2014; no southwestern willow flycatchers were detected during the surveys. A single willow flycatcher (*Empidonax traillii*), ~~State listed as endangered~~, was detected within a stand of ornamental trees at the entrance to a private residence, just south of Auld Road, in the Survey Area in 2014."	D1-39
C.5.1.4	C.5-24	Third full paragraph: "Two California Fully Protected species, white-tailed kite (*Elanus leucurus*) and golden eagle (*Aquila chrysaetos*), have been observed within or adjacent to the Survey Area. While-tailed kites were observed foraging within the northern extent of the Survey Area during surveys in 2012. A pair of golden eagles was observed perched on a rock outcrop in the agricultural fields east of Leon Road and south of Craig Road adjacent to the Survey Area during surveys in 2012; this species is not expected to nest in the Survey Area but likely forages throughout. A total of five burrowing owls (*Athene cunicularia*), a California Species of Special Concern, were detected in or immediately adjacent to the Survey Area during surveys conducted in 2012; suitable habitat for this species occurs throughout the Survey Area."	In 2012, two juvenile golden eagles were observed in the project vicinity. SCE recommends the following change to clarify this was not a mated pair, as follows: "Two California Fully Protected species, white-tailed kite (*Elanus leucurus*) and golden eagle (*Aquila chrysaetos*), have been observed within or adjacent to the Survey Area. While-tailed kites were observed foraging within the northern extent of the Survey Area during surveys in 2012. ~~A pair of~~ ~~t~~Two juvenile golden eagles was observed perched on a rock outcrop in the agricultural fields east of Leon Road and south of Craig Road adjacent to the Survey Area during surveys in 2012; this species is not expected to nest in the Survey Area but likely forages throughout. A total of five burrowing owls (*Athene cunicularia*), a California Species of Special Concern, were detected in or immediately adjacent to the Survey Area during surveys conducted in 2012; suitable habitat for this species occurs throughout the Survey Area."	D1-40
C.5.1.4	C.5-33	Table C.5-5, comments for Mountain plover: "There are no known recent records for this species in the Survey Area; the Survey Area is located within the known geographic wintering range for this species. Suitable breeding and foraging habitat is present in the Survey Area. There is an eBird record for this species just west of Leon Road, north of Baxter Road, in the Survey Area."	Mountain plover do not breed in California, therefore, SCE recommends that the language be revised as follows: "There are no known recent records for this species in the Survey Area; the Survey Area is located within the known geographic wintering range for this species. ~~Suitable breeding and F~~foraging habitat is present in the Survey Area. There is an eBird record for this species just west of Leon Road, north of Baxter Road, in the Survey Area."	D1-41

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5	C.5-34	***Table C.5-5. Known and Potential Occurrence of Special-Status Wildlife within the Survey Area:*** *"Empidonax traillii* (nesting) Willow flycatcher SE, BCC Mature, extensive cottonwoodwillow riparian forest. This species was documented in the Survey Area during surveys conducted in 2012. The Survey Area is located within the known geographic range for this species; suitable foraging and breeding habitat occurs within portions of the Survey Area. A review of online eBird data shows an occurrences of this species in Warm Springs Creek approximately 2.5 miles west of the Survey Area. Present"	Willow flycatcher (*Empidonax traillii*) is not a listed species, therefore SCE recommends the following change in table C5-5. *'Empidonax traillii* (nesting) Willow flycatcher ~~SE~~, BCC Mature, extensive cottonwoodwillow riparian forest. This species was documented in the Survey Area during surveys conducted in 2012. The Survey Area is located within the known geographic range for this species; suitable foraging and breeding habitat occurs within portions of the Survey Area. A review of online eBird data shows an occurrences of this species in Warm Springs Creek approximately 2.5 miles west of the Survey Area. Present"	D1-42
C.5	C.5.51	"Impacts would include a total of 0.20 acres of permanent and 6.16 acres of temporary impact to riparian habitats or sensitive natural communities."	The project is not proposing impacts to any jurisdictional riparian habitats. Additional areas identified as riparian habitat are included within the DEIR that were not mapped as part of SCE's jurisdictional delineation data or included within SCE's PEA submitted to the CPUC. SCE does not necessarily concur with the CPUC's determination that these areas should be classified as jurisdictional riparian habitat and notes that the final determination of jurisdiction can only be made by the applicable resource agencies (i.e., USACE, CDFW, and RWQCB). The DEIR identifies impacts to some or all of these CPUC-mapped riparian habitat areas. However, SCE has reviewed these areas and determined that they will be fully avoided by all construction activities and no impacts are expected. Please see attached JD Discrepancy Summary Table and PDF Figures of the five discrepancy locations in question (Figures – Aspen JD 1-5). Therefore, SCE is recommending the following change: "SCE has committed to avoiding impacts to jurisdictional riparian habitat for the entire VSSP; should this not be feasible during construction, SCE would obtain required permits pursuant to Fish and Game Code 1602. Impacts would include a total of ~~0.20~~ 0.19 acres of permanent and ~~6.16~~ 3.73 acres of temporary impacts to ~~riparian habitats or sensitive~~ non-riparian native and non-native vegetation ~~natural~~ communities."	D1-43

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-52	**Table C.5-9:** **Table C.5-9. Vegetation Community and Land Cover Acreages Proposed Project Impact Areas**	Based on the SCE reference data, the correct acreages for riparian habitats in table C.5-9 areas are as follows:

Table C.5-9. Vegetation Community and Land Cover Acreages Proposed Project Impact Areas

Vegetation Communities	Approximate Acres	
	Permanent	Temporary
Diegan Coastal Sage Scrub	0.19	3.93
Disturbed/Ruderal Habitat	3.16	57.17
Disturbed Wetland	0.00	0.79
Freshwater Marsh	0.00	0.45
Mulefat Scrub	0.00	0.37
Non-native Annual Grassland	0.30	15.14
Non-native Woodland/Ornamental	0.25	8.66
Southern Cottonwood – Willow Riparian	0.01	0.49
Southern Willow Scrub	0.00	0.13
Land Cover Types		
Agriculture	1.28	57.84
Non-vegetated Channel	0.00	0.10
Urban/Developed	4.77	73.33
Total	**9.95**	**218.39**

Table C.5-9. Vegetation Community and Land Cover Acreages Proposed Project Impact Areas

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Mulefat Scrub	0.00	0.37
Non-native Annual Grassland	0.30	15.14
Non-native Woodland/Ornamental	0.25	8.66
Southern Cottonwood – Willow Riparian	0.01	~~0.49~~
Southern Willow Scrub	0.00	~~0.13~~
Land Cover Types		
Agriculture	1.28	57.84
Non-vegetated Channel	0.00	~~0.10~~
Urban/Developed	4.77	73.33
Total	**9.95**	**218.39**

Replace Strike-throughs with 0 acres.

D1-44

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.2	C.5-53	The seventh paragraph: "Although impacts to riparian habitat as part of the VSSP would be relatively minimal, because of the overall loss of these communities within California, and their suitability to support several special-status species, the loss of this habitat, along with other sensitive communities (including non-native annual grassland), would be considered a significant adverse impact without mitigation."	Although riparian habitats occur in the vicinity of the VSSP, no riparian habitats will be impacted by the proposed Project. Additional areas identified as riparian habitat are included within the DEIR that were not mapped as part of SCE's jurisdictional delineation data or included within SCE's PEA submitted to the CPUC. SCE does not necessarily concur with the CPUC's determination that these areas should be classified as jurisdictional riparian habitat and notes that the final determination of jurisdiction can only be made by the applicable resource agencies (i.e., USACE, CDFW, and RWQCB). The DEIR identifies impacts to some or all of these CPUC-mapped riparian habitat areas. However, SCE has reviewed these areas and determined that they will be fully avoided by all construction activities and no impacts are expected. Please see attached JD Discrepancy Summary Table and PDF Figures of the five discrepancy locations in question (Figures – Aspen JD 1-5). Therefore, SCE recommends the paragraph be deleted. "~~Although impacts to riparian habitat as part of the VSSP would be relatively minimal, because of the overall loss of these communities within California, and their suitability to support several special-status species, the loss of this habitat, along with other sensitive communities (including non-native annual grassland), would be considered a significant adverse impact without mitigation~~."	D1-45
C.5.4.2	C.5-53	The eighth paragraph: "Implementation of Mitigation Measures BIO-1 (Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices), BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities), BIO-4 (Develop a Habitat Restoration and Monitoring Plan), and BIO-5 (Implement Biological Construction Monitoring) would minimize impacts to sensitive vegetation communities. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts, development of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would reduce impacts to riparian habitats and sensitive vegetation communities to a less-than-significant level (Class II)."	SCE has committed to becoming a PSE with the WRMSHCP. Impacts to sensitive vegetation communities will be mitigated through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including mitigation fee payment confirmation, will be submitted to the CPUC prior to site mobilization activities. Therefore, SCE is recommending to delete duplicative mitigation measures as follows: "Implementation of Mitigation Measures BIO-1 (Implement a Worker Environmental ~~Education~~ **Awareness** Program), BIO-2 (Implement Best Management Practices), and adherence to the mitigation measures as required by a PSE within the WRMSHCP ~~BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities), BIO-4 (Develop a Habitat Restoration and Monitoring Plan), and BIO-5 (Implement Biological Construction Monitoring) would minimize impacts to sensitive vegetation communities. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts, development of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures~~ would reduce impacts to riparian habitats and sensitive vegetation communities to a less-than-significant level (Class II)."	D1-46

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.2	C.5-54	Mitigation Measures for Impact BIO-1: **"BIO-1 Implement a Worker Environmental Education Program.** Prior to any proposed Project activities on the site (i.e., surveying, mobilization, fencing, grading, or construction), a Worker Environmental ~~Education~~ Program (~~WEEP~~WEAP) shall be prepared and implemented by a qualified biologist(s). The WEEP shall be approved by the CPUC and finalized prior to issuance of construction permits, and implemented throughout the duration of the construction activities…"	SCE's standard education program is titled Worker Environmental Awareness Program. SCE requests this be changed globally throughout the document, to state for example: "**BIO-1 Implement a Worker Environmental ~~Education~~ Awareness Program.** Prior to any proposed Project activities on the site (i.e., surveying, mobilization, fencing, grading, or construction), a Worker Environmental ~~Education~~ Program (~~WEEP~~WEAP) shall be prepared and implemented by a qualified biologist(s). The WEEP shall be approved by the CPUC and finalized prior to issuance of construction permits, and implemented throughout the duration of the construction activities…"	D1-47
C.5.4.2	C.5-55	The third bulleted item: "Vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas to the extent practicable."	SCE proposes to use previously disturbed areas within its ROW for vehicle, equipment, or other project related staging in order to avoid creation of new habitat disturbance. Therefore, SCE recommends that the language be revised as follows: "Vehicles and equipment shall be parked on pavement, existing roads, ~~and previously disturbed areas~~ and areas permanently or temporarily disturbed in support of the project to the extent practicable."	D1-48
C.5.4.2	C.5-55	The fourth bulleted item: "Speed limit signs, imposing a speed limit of 15 miles per hour, will be installed throughout the VSSP site prior to initiation of site disturbance and/or construction."	SCE recommends that the locations to post speed limit signage be specific as to the type of roads to not conflict with existing public speed limit signs: "Speed limit signs, imposing a speed limit of 15 miles per hour, will be installed where construction vehicles would travel off road throughout the VSSP site prior to initiation of site disturbance and/or construction."	D1-49
C.5.4.2	C.5-56	The second full paragraph: "The creation or restoration of habitat shall be required for all permanent impacts to sensitive vegetation communities. The replacement ratios for permanent impacts to riparian vegetation are 3:1; a ratio of 1:1 shall be applied to all other sensitive communities (including non-native annual grassland)."	SCE has committed to becoming a PSE with the WRMSHCP. Impacts to sensitive vegetation communities will be mitigated through participation and implementation of the MSHCP requirements. In addition, it is not a standard practice nor sensible to restore a non-native plant community. Therefore, SCE recommends that the language be revised as follows: "The creation or restoration of habitat shall be required for all permanent impacts to sensitive vegetation communities, per the MSHCP requirements. ~~The replacement ratios for permanent impacts to riparian vegetation are 3:1; a ratio of 1:1 shall be applied to all other sensitive communities (including non-native annual grassland).~~"	D1-50
C.5.4.2	C.5-56	Mitigation BIO-2 last bullet states: • "The VSSP shall be constructed to the most current Avian Power Line Interaction Committee's standards."	SCE designs its structures to be consistent with the suggested practices for Avian Protection on Power Lines. Therefore, SCE recommends revising this bullet as follows: • "The VSSP shall be designed consistent with ~~constructed to~~ the most current Avian Power Line Interaction Committee's suggested practices ~~standards~~."	D1-51

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-56	Mitigation Measure **BIO-4 Develop a Habitat Restoration and Monitoring Plan** in its entirety.	The proposed Project will not have any impacts to jurisdictional waters or riparian habitats regulated by CDFW or ACOE. In addition, the proposed compensation land selection criteria in this measure are vague and in many cases unmeasurable. For sensitive habitats that are not riparian but still considered sensitive, SCE has committed to becoming a PSE with the WRMSHCP. Impacts to sensitive vegetation communities will be mitigated through participation and implementation of the MSHCP requirements. Therefore, SCE is recommending to remove Mitigation Measure BIO-3 in its entirety. "~~**BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.** To compensate for impacts to sensitive vegetation communities from the construction of the VSSP, SCE shall restore all temporary impact areas; restoration shall be completed as described in the Habitat Restoration and Monitoring Plan outlined below under Mitigation Measure BIO-4. Prior to disturbance, SCE shall have a qualified biologist, approved by the CPUC, verify the community type and acreage of vegetation that would be subject to VSSP disturbance. Impacts to all native trees with a diameter at breast height (DBH) greater than 3 inches would be documented by identifying the species, number, location, and DBH. All protection and replacement measures shall be consistent with applicable local jurisdiction requirements. The creation or restoration of habitat shall be required for all permanent impacts to sensitive vegetation communities. The replacement ratios for permanent impacts to riparian vegetation are 3:1; a ratio of 1:1 shall be applied to all other sensitive communities (including non-native annual grassland). All created or restored habitats shall be monitored per the requirements in the Habitat Restoration and Monitoring Plan (see Mitigation Measure BIO-4). If SCE becomes a PSE with the MSHCP, compensation for impacts to sensitive vegetation communities may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including mitigation fee payment confirmation, shall be submitted to the CPUC prior to site mobilization activities. ***Compensation Land Selection Criteria.*** Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands would include all of the following: •Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the VSSP, taking into consideration soils, vegetation, topography, humanrelated disturbance, wildlife movement opportunity, proximity to other protected lands, management feasibility, and other habitat values. •To the extent that proposed compensation habitat may have been degraded by previous uses or activities, the site quality and nature of degradation must support the expectation that it will regenerate naturally when disturbances are removed; •Be near larger blocks of lands that are either already protected or planned for protection, or which could feasibly be protected long-term by a public resource agency or a non-governmental organization dedicated to habitat preservation;~~ **(see next page)**

D1-52

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)			~~•Not have a history of intensive recreational use or other disturbance that might cause future erosion or other habitat damage, and make habitat recovery and restoration infeasible;~~ ~~Not be characterized by high densities of invasive species, either on or immediately adjacent to the parcels under consideration, that might jeopardize habitat recovery and restoration;~~ ~~•Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat;~~ ~~•Must provide wildlife movement value equal to that on the project site, based on topography, presence and nature of movement barriers or crossing points, location in relationship to other habitat areas, management feasibility, and other habitat values; and~~ ~~SCE shall either donate open space/conservation easements or provide funds for the acquisition of such easements to a "qualified easement holder" (defined below). The CDFW is a qualified easement holder. To qualify as a "qualified easement holder" a private land trust must have:~~ ~~•Substantial experience managing open space/conservation easements that are created to meet mitigation requirements for impacts to special-status species;~~ ~~•Adopted the Land Trust Alliance's Standards and Practices; and~~ ~~•A stewardship endowment fund to pay for its perpetual stewardship obligations.~~ ~~The CPUC will determine whether a proposed easement holder meets these requirements.~~ ~~SCE shall also be responsible for providing to the qualified easement holder fees sufficient to cover: (1) Administrative costs incurred in the creation of the easement (appraisal, documenting baseline conditions, etc.) and (2) Funds in the form of a non-wasting endowment to cover the cost of monitoring and enforcing the terms of the easement in perpetuity.~~"

D1-52 cont.

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-57	Mitigation Measure **BIO-4 Develop a Habitat Restoration and Monitoring Plan** in its entirety.	SCE has committed to becoming a PSE under the WRMSHCP. Impacts to sensitive vegetation communities will be mitigated through participation and implementation of the MSHCP requirements, and additional compensatory mitigation or onsite restoration will not be required. Therefore, SCE is recommending Mitigation Measure BIO-4 be removed in its entirety. ~~**"BIO-4 Develop a Habitat Restoration and Monitoring Plan.** The intent of this mitigation measure is to require SCE to restore temporarily disturbed areas to pre-construction conditions or better. Prior to the site mobilization activities and removal of any vegetation, SCE shall retain a qualified biologist (approved by the CPUC) knowledgeable in the area(s) of restoration as they pertain to the on-site vegetation communities, to prepare a Habitat Restoration and Monitoring Plan (HRMP); the plan must be approved by the CPUC prior to the start of site mobilization activities. This biologist will also be responsible for monitoring the implementation of the plan as well as the progress on achieving the established success criteria.~~ ~~The purpose of the HRMP will be to explicitly identify the process by which all temporarily disturbed areas shall be restored to pre-construction conditions. The plan will address restoration and revegetation related to disturbance from construction. The plan shall include, at a minimum, the following items:~~ ~~• Figures depicting areas proposed for temporary disturbance – The HRMP shall include detailed figures indicating the locations and vegetation types of areas proposed for temporary disturbance. These figures shall be updated, as necessary, to reflect current site conditions should they change.~~ ~~• Proposed species for restoration/revegetation – The species palate proposed for restoration/revegetation shall include an appropriate native seed mix representative of the current species composition in the restoration/revegetation areas, and shall not contain non-native invasive species. Seed must be from genetic stock appropriate to Western Riverside County.~~ ~~• Planting methodology – A description of the preferred methods proposed for seeding shall be provided (e.g., hydroseeding, drill seeding, broadcast seeding, etc.). Additionally, a discussion on timing of seeding, type of irrigation system proposed (as needed), type and duration of irrigation, and erosion controls proposed for revegetation activities shall be included.~~ ~~• Success criteria – A description of the success criteria for the restoration/revegetation efforts, and supplemental activities to be conducted to ensure success criteria are met.~~ **(see next page)**

D1-53

Comment Set D10 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)			~~•Monitoring program – Areas subject to restoration/revegetation shall be monitored to assess progress and to make recommendations for successful habitat establishment. Monitoring will be performed by a qualified biologist(s) knowledgeable in the area of habitat restoration specific to the on-site vegetation communities. Monitoring should include, at a minimum:~~ ~~– Qualitative Monitoring – Qualitative monitoring surveys will be performed monthly in all restored/revegetated areas for the first year following planting in any phase of the VSSP. Qualitative monitoring will be on a quarterly schedule thereafter, until final completion and approval by the appropriate regulatory agencies. Qualitative surveys will assess native plant species performance, including growth and survival, germination success, reproduction, and plant fitness and health as well as pest or invasive plant problems.~~ ~~– Monitoring at this stage will indicate need for remediation or maintenance work well in advance of final success/failure determination. The monitoring reports will describe site progress toward achieving success criteria, conditions, and all observations pertinent to eventual success, and make recommendations as appropriate regarding remedial~~ ~~– work, maintenance, etc.~~ ~~– Quantitative Monitoring – Quantitative monitoring will occur annually for years one to five or until the success criteria are met. Within each revegetation area, the biologist will collect data in a series of 1 m2 quadrats to estimate cover and density of each plant species within the restored/revegetated areas. In year 2 or 3, depending on the growth within the restoration area, the qualitative monitoring methods may deviate from the quadrat methodology to toepoint transects based on methods described by Evans and Love (1957). Data will be used to measure native species growth performance, to estimate native and non-native species coverage, seed mix germination, native species recruitment and reproduction, and species diversity. Based on these results, the biologist will make recommendations for maintenance or remedial work on the site and for adjustments to the approved seed mix.~~ ~~•Reporting – Reporting will include progress reports summarizing site status and recommended remedial measures that will be submitted by the biologist on a quarterly basis, with the exception of the site visits immediately preceding the development of each annual status report (see below). Each progress report will list estimated species coverage and diversity, species health and overall vigor, the establishment of volunteer native species, topographical/soils conditions, problem weed species, the use of the site by wildlife, significant drought stress, and any recommended remedial measures deemed necessary to ensure compliance with specified success criteria.~~ **(see next page)**

D1-53 cont.

Comment Set D10 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)			~~One annual site status report that summarizes site conditions will be forwarded by the biologist to the appropriate regulatory agencies (i.e., USACE, CDFW, and CPUC) at the end of each year following implementation of this plan until the established success criteria have been met. Each annual report will list plant species coverage and diversity measured during yearly quantitative surveys, compliance/non-compliance with required success criteria, species health and overall vigor, the establishment of volunteer native species, hydrological and topographical conditions, use of the site by wildlife, and the presence of invasive weed species. In the event of substantial non-compliance with the required success criteria, the reports will include remedial measures deemed necessary to ensure future compliance with specified performance criteria. Each annual report will include, at the minimum:~~ ~~• The name, title, and company of all persons involved in restoration monitoring and report preparation;~~ ~~• Maps or aerials showing restoration areas, transect locations, and photo documentation locations;~~ ~~• An explanation of the methods used to perform the work, including the number of acres treated for removal of non-native plants; and~~ ~~• An assessment of the treatment success."~~

D1-53 cont.

Comment Set D10 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.2	C.5-59	Mitigation Measure **BIO-5 Implement Biological Construction Monitoring:** **"**No more than 30 days prior to the commencement of ground disturbance or site mobilization activities, SCE shall retain a qualified biologist(s), approved by the CPUC, to monitor VSSP construction. The biologist will have demonstrated expertise with special-status plants, terrestrial mammals, reptiles, and birds. Monitoring will occur during initial ground disturbance for each phase of construction. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities. The qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special-status species. Any special-status plants shall be flagged for avoidance. Any special-status terrestrial species found within a VSSP impact area shall be relocated by the authorized biologist to suitable habitat outside the impact area (permits and/or MOU's may be required for some species). Clearance surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day during initial ground disturbance, and weekly thereafter. If nesting birds are found during the pre-construction surveys appropriate buffers shall be installed (as prescribed in Mitigation Measure BIO-6 [Conduct pre-construction surveys for nesting and breeding birds and implement avoidance measures])."	Verification of biological requirements is completed by SCE Biological project manager and wildlife agencies as applicable. Additional review and approvals have led to delays and impacted construction schedules. Also, SCE has committed to becoming a PSE under the WRMSHCP. Biological monitoring requirements including timing and frequency are detailed in the MSHCP. Therefore, SCE is recommending the following revisions to Mitigation Measure **BIO-5 Implement Biological Construction Monitoring**:: " No more than 30 days prior to the commencement of ground disturbance or site mobilization activities, SCE shall retain a qualified biologist(s), ~~approved by the CPUC~~, to monitor VSSP construction. The biologist will have demonstrated expertise with special-status plants, terrestrial mammals, reptiles, and birds. Monitoring will occur during initial ground disturbance for each phase of construction and as required through participation in the WRCMSHCP. ~~. Once initial ground disturbance is complete, monitoring will occur periodically during all construction activities. The qualified biologist(s) shall be present at all times during ground-disturbing activities immediately adjacent to, or within, habitat that supports populations of listed or special-status species.~~ Any special-status plants shall be flagged for avoidance. Any special-status terrestrial species found within a VSSP impact area shall be relocated by the authorized biologist to suitable habitat outside the impact area (permits and/or MOU's may be required for some species). Clearance surveys for special-status species shall be conducted by the authorized biologist prior to the initiation of construction each day during initial ground disturbance~~, and weekly thereafter~~. If nesting birds are found during the pre-construction surveys appropriate buffers shall be installed (as prescribed in Mitigation Measure BIO-6 [Conduct pre-construction surveys for nesting and breeding birds and implement avoidance measures])."	D1-54
C.5.4.2	C.5-60	Fourth paragraph, second sentence: "Reijnen et al. demonstrated that for two species of European warbler (*Phylloscopus* sp.), sound levels between 26 dB(A) and 40 dB(A) reduced breeding density by up to 60 percent compared to areas without disturbance (1995)."	This reference is not relevant to the conditions in southern California. Reijnen et al. citation is not relevant to neo-tropical migrants or this region, therefore SCE recommends removing the citation and including information for species relevant to our project area. "~~Reijnen et al. demonstrated that for two species of European warbler (*Phylloscopus* sp.), sound levels between 26 dB(A) and 40 dB(A) reduced breeding density by up to 60 percent compared to areas without disturbance (1995).~~"	D1-55

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.2	C.5-63	The second paragraph: "**Nest Buffer Modification or Reduction.** At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist, approved by CPUC in consultation with the CDFW and/or USFWS. The NBMP shall provide a procedure and timing requirements for notifying CPUC, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format."	Approval of buffer reductions is not required for non-special status species. SCE is recommending the following edit be made to clarify that only special status species would require approval. "**Nest Buffer Modification or Reduction.** At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments for special-status species shall be reviewed and recommended by a qualified avian biologist, approved by CPUC in consultation with the CDFW and/or USFWS. For non-special-status species, a notification will be sent to the CPUC, CDFW, and USFWS. The NBMP shall provide a procedure and timing requirements for notifying CPUC, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format."	D1-56
C.5.4.2	C.5-64	Paragraph beneath the heading Noise Monitoring Component states, "If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall prepare and implement noise monitoring throughout construction and/or VSSP related activities taking place while listed birds occupy the nesting territory."	SCE requests the following change to clarify that this requirement is specific to special status species. "If an active breeding territory or nest for a special-status species is confirmed within 500 feet of any project activity site, SCE shall prepare and implement noise monitoring throughout construction and/or VSSP related activities taking place while listed birds occupy the nesting territory."	D1-57
C.5.4.2	C.5-65	The fourth paragraph: "To minimize impacts to wildlife in adjacent habitats, the following measures have been identified: Mitigation Measures BIO-1 (Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices), BIO-5 (Implement Biological Construction Monitoring), BIO-6 (Conduct Pre-Construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures), and BIO-7 (Prepare and Implement a Nesting Bird Management Plan). These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, monitoring noise levels near nest sites, and clearance surveys for nesting birds and raptors prior to the start of construction activities."	SCE has committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP a habitat restoration plan is not required. A habitat restoration and monitoring plan would not significantly reduce the impacts to adjacent wildlife, as impacts related to construction would be temporary in nature. Therefore, SCE requests the following change. "To minimize impacts to wildlife in adjacent habitats, the following measures have been identified: Mitigation Measures BIO-1 (Implement a Worker Environmental Awareness Program), BIO-2 (Implement Best Management Practices), and adherence to the mitigation measures as required by a PSE within the WRMSHCP BIO-5 (Implement Biological Construction Monitoring), BIO-6 (Conduct Pre- Construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures), and BIO-7 (Prepare and Implement a Nesting Bird Management Plan). These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, ~~development of a Habitat Restoration and Monitoring Plan~~, conducting biological monitoring during ground disturbing and other construction related activities, monitoring noise levels near nest sites, and clearance surveys for nesting birds and raptors prior to the start of construction activities."	D1-58

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-66	The last paragraph: "To minimize impacts to LBV, WFL, and SWFL, Mitigation Measure BIO-8 *(Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow flycatcher; Avoid Occupied Habitat)* has been identified to require protocol surveys within suitable habitat, avoidance of any active nests, and monitoring of nest buffers. In addition, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices)*, BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan), BIO-5 (Implement Biological Construction Monitoring)*, BIO-6 *(Conduct Pre-Construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures)*, and BIO-7 (*Prepare and Implement a Nesting Bird Management Plan)* would further reduce potential impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting preconstruction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, monitoring noise levels near nest sites, and clearance surveys for nesting birds and raptors prior the start of construction activities."	SCE has committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP measures which include, but are not limited to, preconstruction surveys; construction monitoring; development and implementation of a nesting bird management plan; and avoidance of direct construction impacts to riparian and wetland habitats. Implementation of APM BIO-3 will avoid direct and indirect impacts to least Bell's vireo by establishing an appropriately sized avoidance buffer during the breeding season for construction in the vicinity of suitable riparian habitat. Implementation of the MSHCP BMP measures will ensure all suitable riparian habitat for least Bell's vireo and other riparian species is flagged for avoidance. Therefore, SCE is recommending the following change: "To minimize impacts to LBV, WFL, and SWFL, ~~Mitigation Measure BIO-8 *(Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow flycatcher; Avoid Occupied Habitat)* has been identified to require protocol surveys within suitable habitat, avoidance of any active nests, and monitoring of nest buffers. In addition, Mitigation Measures~~ BIO-1 *(Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices),* ~~*BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities),* BIO-4 *(Develop a Habitat Restoration and Monitoring Plan),*~~ *BIO-5 (Implement Biological Construction Monitoring)*, BIO-6 *(Conduct Pre-Construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures)*, and BIO-7 (*Prepare and Implement a Nesting Bird Management Plan)* would further reduce potential impacts. ~~These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting preconstruction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, monitoring noise levels near nest sites, and clearance surveys for nesting birds and raptors prior the start of construction activities."~~

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-67	Mitigation Measure **BIO-8 Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow Flycatcher; Avoid Occupied Habitat** in its entirety.	SCE has already identified that LBV occupy habitat within and adjacent to the project area. SCE is committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP measures which include, but are not limited to, preconstruction surveys; construction monitoring; development and implementation of a nesting bird management plan; and avoidance of direct construction impacts to riparian and wetland habitats. Implementation of APM BIO-3 and MSHCP BMP measures will ensure all suitable riparian habitat for least Bell's vireo and other riparian species is flagged for avoidance, and the species is not disturbed during nesting, therefore it would not be necessary to conduct protocol level surveys to determine occupied habitat for LBV and, Southwestern Willow Flycatcher. Therefore, SCE is recommending Mitigation Measure BIO-8 be removed in its entirety. ~~"**BIO-8 Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow Flycatcher; Avoid Occupied Habitat.** Construction activities shall avoid suitable habitat for listed riparian birds and occur outside of the recognized breeding season to the extent feasible. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS and obtain the appropriate take authorizations or permits prior to site mobilization activities. SCE shall also implement any conservation measures contained within these permits. Mitigation Measure BIO- 3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities)* will compensate for impacts to Least Bell's Vireo (LBV), Southwestern Willow Flycatcher (SWFL), and Willow Flycatcher (WFL) habitat by requiring the restoration, creation, or acquisition of lands containing riparian habitat; no further compensation is required. Take of LBV, SWFL, and WFL habitat and incidental take of individual LBV, SWFL, and/or WFL may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP. Documentation of participationand compliance with the MSHCP, including mitigation fee payment confirmation, shall be provided to the CPUC prior to site mobilization activities.~~ ~~If VSSP related activities are scheduled to occur during the breeding season (February through September), SCE shall have a qualified and permitted avian biologist, approved by the CPUC, conduct protocol surveys in suitable habitat within 500 feet of disturbance areas. In known occupied habitat for listed riparian birds, SCE shall conduct focused protocol surveys of the VSSP and adjacent areas within 500 feet. The surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season.~~ ~~Prior to construction, SCE shall submit documentation providing the results of the preconstruction focused surveys for LBV, SWFL, and WFL to the CPUC for review and approval in consultation with USFWS and CDFW. Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities.~~ ~~If an active breeding territory or nest is confirmed, the CPUC, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC for review on a weekly basis. In coordination with the USFWS and CDFW, a minimum 300-foot disturbance-free ground buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers.~~ **(see next page)**

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VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)			~~The qualified biologist shall have the authority to halt construction activities and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between the nest site and the construction activities, and working in other areas until the young have fledged. All active nests shall be monitored on a weekly basis until the nestlings fledge.~~"

D1-60 cont.

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-68	Last paragraph: "Impacts to CAGN would be similar to those described above under Impacts BIO-3 *(The project would result in disturbance to nesting birds or raptors)* and BIO-5 (*The project could disturb nesting willow flycatchers, southwestern willow flycatchers, least Bell's vireos, or their habitat)*. Construction activities will be conducted outside the recognized breeding season to the extent possible. Should construction occur during the breeding season it is possible that the increased noise and disturbance related to VSSP activities would exclude birds such as CAGN that are less tolerant of anthropogenic disturbance. Refer to Impact BIO-3 above for additional information on noise and disturbance related impacts to birds. VSSP activities that result in the degradation to habitat for or the loss of CAGN would be considered a significant adverse impact without mitigation. To minimize impacts to CAGN, Mitigation Measure BIO-9 *(Conduct Protocol Surveys for Coastal California Gnatcatcher and Avoid Occupied Habitat)* would require protocol surveys of suitable habitat, avoidance of any active nests, and monitoring of nest buffers and BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities)* would require restoration, enhancement, or land compensation for impacts to coastal sage scrub habitats. In addition, to further reduce impacts the following additional measures are recommended: Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, BIO-4 (*Develop a Habitat Restoration and Monitoring Plan)*, BIO-*5 (Implement Biological Construction Monitoring)*, BIO-6 *(Conduct Pre-Construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures)*, and BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)*. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, monitoring noise levels near nest sites and clearance surveys for nesting birds and raptors prior the start of construction activities."	SCE has committed to becoming a PSE with the WRMSHCP. Impacts to CAGN will be mitigated through participation and implementation of the MSHCP requirements, therefore protocol surveys are not necessary and SCE recommends the following change. "Impacts to CAGN would be similar to those described above under Impacts BIO-3 *(The project would result in disturbance to nesting birds or raptors)* and BIO-5 (*The project could disturb nesting willow flycatchers, southwestern willow flycatchers, least Bell's vireos, or their habitat)*, however, unlike riparian birds, CAGN are fully covered by the WRCMSHCP. ~~Construction activities will be conducted outside the recognized breeding season to the extent possible. Should construction occur during the breeding season it is possible that the increased noise and disturbance related to VSSP activities would exclude birds such as CAGN that are less tolerant of anthropogenic disturbance. Refer to Impact BIO-3 above for additional information on noise and disturbance related impacts to birds. VSSP activities that result in the degradation to habitat for or the loss of CAGN would be considered a significant adverse impact without mitigation.~~ To minimize impacts to CAGN, SCE shall implement Mitigation Measure ~~BIO-9 *(Conduct Protocol Surveys for Coastal California Gnatcatcher and Avoid Occupied Habitat)* would require protocol surveys of suitable habitat, avoidance of any active nests, and monitoring of nest buffers and BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities)* would require restoration, enhancement, or land compensation for impacts to coastal sage scrub habitats. In addition, to further reduce impacts the following additional measures are recommended: Mitigation Measures~~ BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, ~~BIO-4 (*Develop a Habitat Restoration and Monitoring Plan)*, BIO-*5 (Implement Biological Construction Monitoring)*,~~ BIO-6 *(Conduct Pre-Construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures)*, and BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* and adhere to the mitigation measures as required of a PSE within the WRMSHCP to reduce impacts to less than significant.. ~~These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, monitoring noise levels near nest sites and clearance surveys for nesting birds and raptors prior the start of construction activities.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

C.5.4.2	C.5-69	Mitigation Measure **BIO-9 Conduct Protocol Surveys for Coastal California Gnatcatcher (CAGN) and Avoid Occupied Habitat** in its entirety.	SCE has committed to becoming a PSE with the WRMSHCP. Impacts to CAGN will be mitigated through participation and implementation of the MSHCP requirements, therefore protocol surveys are not necessary and SCE recommends removing Mitigation Measure BIO-9 in its entirety. "~~**BIO-9 Conduct Protocol Surveys for Coastal California Gnatcatcher (CAGN) and Avoid Occupied Habitat.** Construction activities shall avoid suitable habitat for CAGN and occur outside of the recognized breeding season to the extent feasible. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS and obtain the appropriate take authorizations or permits prior to site mobilization activities. SCE shall also implement any conservation measures contained within these permits. Mitigation Measure BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities) will compensate for impacts to CAGN habitat by requiring the restoration, creation, or acquisition of lands containing coastal sage scrub habitat; no further compensation is required. Take of CAGN habitat and incidental take of individual CAGN may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP. Documentation of participation and compliance with the MSHCP, including mitigation fee payment confirmation, shall be provided to the CPUC prior site mobilization activities.~~ ~~SCE shall have a qualified and permitted avian biologist, approved by the CPUC, conduct protocol surveys for CAGN in all areas of coastal sage scrub habitat that may be affected by the proposed Project. Survey areas will include a 500-foot buffer around proposed Project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories; survey areas shall include a 500-foot buffer around VSSP disturbance areas.~~ ~~Surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for coastal California gnatcatchers to the CPUC for review and approval in consultation with USFWS and CDFW. Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities.~~ ~~If an active breeding territory or nest is confirmed, the CPUC, USFWS, and CDFW shall be notified immediately. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC for review on a weekly basis. In coordination with the USFWS and CDFW, a minimum 300-foot disturbance-free ground buffer shall be established around the active nest and demarcated by fencing or flagging. No construction or vehicle traffic shall occur within nest buffers.~~ ~~The qualified biologist shall have the authority to halt construction activities and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between the nest site and the construction activities, and working in other areas until the young have fledged. All active nests shall be monitored on a weekly basis until the nestlings fledge.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-71	Second paragraph: "To reduce and/or avoid impacts to Quino checkerspot, Mitigation Measure BIO-10 (*Protocol Surveys for Quino checkerspot and Avoidance of Suitable/Occupied Habitat)* and BIO-11 (*Compensation for Impacts to Quino checkerspot Suitable Habitat)* would be required to conduct protocol surveys of suitable habitat, avoidance of suitable/occupied habitat, and compensation for impacts to suitable habitat. In addition, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices)*, BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, and BIO-5 (*Implement Biological Construction Monitoring)* would also be required to further reduce impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would minimize impacts to Quino checkerspot, to the extent possible, and reduce impacts to a less-than-significant level (Class II). If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to Quino checkerspot, above and beyond those described below, may be required. ***Mitigation Measures for Impact BIO-7*** **NOI-2 Implement Best Management Practices for Construction Noise.** (Section C.12 Noise) **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** **BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.** **BIO-4 Develop a Habitat Restoration and Monitoring Plan.** **BIO-5 Implement Biological Construction Monitoring."**	SCE has committed to becoming a PSE with the WRMSHCP. Impacts to Quino checkerspot will be mitigated through participation and implementation of the MSHCP requirements and protocol surveys are not required. Documentation of participation and compliance with the MSHCP, including mitigation fee payment confirmation, shall be submitted to the CPUC prior to site mobilization activities. Therefore, SCE recommends that the language be revised as follows: "SCE has committed to becoming a PSE with the WRMSHCP. Impacts to Quino Checkerspot will be mitigated through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including mitigation fee payment confirmation, shall be submitted to the CPUC prior to site mobilization activities. To reduce and/or avoid impacts to Quino checkerspot, ~~Mitigation Measure BIO-10 (*Protocol Surveys for Quino checkerspot and Avoidance of Suitable/Occupied Habitat)* and BIO-11 *(Compensation for Impacts to Quino checkerspot Suitable Habitat)* would be required to conduct protocol surveys of suitable habitat, avoidance of suitable/occupied habitat, and compensation for impacts to suitable habitat. In addition,~~ SCE shall implement Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices)*, ~~BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, and BIO-5 (*Implement Biological Construction Monitoring)* would also be required to further reduce impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of~~ BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities and adhere to the mitigation measures as required of a PSE within the WRMSHCP to reduce impacts to less than significant.~~. Implementation of these mitigation measures would minimize impacts to Quino checkerspot, to the extent possible, and reduce impacts to a less-than-significant level (Class II).~~ ~~If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to Quino checkerspot, above and beyond those described below, may be required.~~ ***Mitigation Measures for Impact BIO-7*** **NOI-2 Implement Best Management Practices for Construction Noise.** (Section C.12 Noise) **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** ~~**BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.**~~ ~~**BIO-4 Develop a Habitat Restoration and Monitoring Plan.**~~ ~~**BIO-5 Implement Biological Construction Monitoring.**~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-71	Mitigation Measure **BIO-10 Protocol Surveys for Quino Checkerspot and Avoidance of Suitable/Occupied Habitat** in its entirety.	SCE has committed to becoming a PSE with the WRMSHCP. Impacts to Quino checkerspot will be mitigated through participation and implementation of the MSHCP requirements and protocol surveys are not required. Therefore, SCE requests removing Mitigation Measure BIO-10 in its entirety: "~~**BIO-10 Protocol Surveys for Quino Checkerspot and Avoidance of Suitable/Occupied Habitat.**~~ ~~Construction of the VSSP will avoid and minimize, to the extent possible, impacts to coastal sage scrub and grassland vegetation communities. These habitat types are known to support the larval host (i.e., dot-seed plantain) and adult food plants (i.e., dot-seed plantain, *Lasthenia* sp., and *Cryptantha* sp.) for the Quino checkerspot. If suitable habitat cannot be avoided, SCE shall consult with the USFWS and obtain the appropriate take authorizations or permits. SCE shall also implement any conservation measures contained within these permits. Take of Quino checkerspot habitat and incidental take of individual Quino checkerspot may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP. Documentation of participation with the MSHCP, including mitigation fee payment confirmation, shall be provided to the CPUC prior to any take of this species.~~ ~~SCE will conduct protocol surveys, following current USFWS guidelines, for the Quino checkerspot; any deviations from the most up to date guidelines must be approved by the USFWS. Surveys will be conducted by a qualified and permitted biologist approved by the CPUC. Protocols require an initial site habitat assessment, prior to the first survey, to determine the location of areas with suitable habitat. Subsequent surveys are not to be conducted concurrently with any other survey effort. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for Quino checkerspot to the CPUC for review and approval in consultation with the USFWS.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.2	C.5-72	Mitigation Measure **BIO-11 Compensation for Impacts to Quino Checkerspot Suitable Habitat** in its entirety.	SCE has committed to becoming a PSE with the WRMSHCP. Impacts to Quino checkerspot will be mitigated through participation and implementation of the MSHCP requirements and protocol surveys are not necessary. Therefore SCE requests removing Mitigation Measure BIO-10 in its entirety as compensatory mitigation in addition to fees paid as part of the MSHCP will not be required. "~~**BIO-11 Compensation for Impacts to Quino Checkerspot Suitable Habitat.** SCE will provide compensation for impacts to suitable habitat containing the larval host plant for this species; the larval host plant is dot-seed plantain. Mitigation Measure BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)* will compensate for impacts to habitat by requiring the restoration, creation, or acquisition of lands containing riparian habitat, coastal sage scrub habitat, annual grassland, or other sensitive habitats. However, this measure does not require compensation for common and/or non-native plant communities other than annual grassland. Dot-seed plantain often occurs in native and non-native communities in which compensation for impacts is not required. Therefore, the creation or restoration of habitat shall~~ ~~be required at a 1:1 ratio for all permanent impacts to habitats within the VSSP site, found to support populations of the host plant, that do not require compensation under Mitigation Measure BIO-3. The compensation land criteria presented in Mitigation Measure BIO-3 will also apply to lands obtained for impacts to Quino checkerspot.~~ ~~If SCE becomes a PSE with the MSHCP, compensation for impacts to Quino checkerspot may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including mitigation fee payment confirmation, shall be submitted to the CPUC prior to site mobilization activities.~~"	D1-65
C.5.4.2	C.5-72	The third paragraph: "If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to listed fairy shrimp, above and beyond those described below, may be required."	SCE has committed to becoming a PSE with the WRMSHCP, therefore, SCE recommends that the language be revised as follows: "~~If SCE becomes a PSE in the~~ As part of SCE's participation as a PSE with the MSHCP additional measures to mitigate the proposed Project's impacts to listed fairy shrimp, above and beyond those described below, may be required."	D1-66

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-72	The last paragraph "To reduce and/or avoid impacts to listed fairy shrimp, Mitigation Measures BIO-12 *(Complete Protocollevel Surveys for Vernal Pool and Riverside Fairy Shrimp)*, BIO-13 (*Avoid Seasonal Depressions and Known Waterbodies)*, and BIO-14 *(Compensate for Impacts to Vernal Pool or Riverside Fairy Shrimp Habitat)* would be required. These measures require protocol surveys prior to VSSP site disturbance, avoidance of seasonal depressions and known water bodies, and requires compensation for impacts to suitable habitat or loss of individuals. In addition, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, and BIO-5 (*Implement Biological Construction Monitoring)* would also be required. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would minimize impacts to listed fairy shrimp, to the extent possible, and would reduce impacts to a lessthan- significant level (Class II)."	As required for inclusion in the WRCMSHCP, two consecutive years for wet and dry fairy season surveys were conducted, all yielding negative results. Per the WRCMSHCP, no additional surveys are required and previously stated mitigation measures would be sufficient for avoiding impacts to special status fairy shrimp. Therefore, SCE recommends that the language be revised as follows: "To reduce and/or avoid impacts to listed fairy shrimp, ~~Mitigation Measures BIO-12 *(Complete Protocollevel Surveys for Vernal Pool and Riverside Fairy Shrimp)*, BIO-13 (*Avoid Seasonal Depressions and Known Waterbodies)*,~~ and ~~BIO-14 *(Compensate for Impacts to Vernal Pool or Riverside Fairy Shrimp Habitat)* would be required. These measures require protocol surveys prior to VSSP site disturbance, avoidance of seasonal depressions and known water bodies, and requires compensation for impacts to suitable habitat or loss of individuals. In addition,~~ Mitigation Measures BIO-1 *(Implement a Worker Environmental ~~Education~~ Awareness Program)*, BIO-2 *(Implement Best Management Practices)*, ~~and BIO-5 (*Implement Biological Construction Monitoring)* would also be required. These measures include worker education describing the sensitive biological resources that occur on the VSSP site,~~ implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), and conducting pre-construction surveys, ~~development of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures~~ would minimize impacts to listed fairy shrimp, to the extent possible, and would reduce impacts to a less than- significant level (Class II)."

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SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-73	Mitigation Measure **"BIO-12 Complete Protocol-level Surveys for Vernal Pool and Riverside Fairy Shrimp** in its entirety.	As required for inclusion in the WRCMSHCP, two consecutive years for wet and dry fairy season surveys were conducted, all yielding negative results. Per the WRCMSHCP, no additional surveys are required and previously stated mitigation measures would be sufficient for avoiding impacts to special status fairy shrimp. Therefore, SCE requests removing Mitigation Measure BIO-12 in its entirety as follows: "~~**BIO-12 Complete Protocol-level Surveys for Vernal Pool and Riverside Fairy Shrimp.** SCE will conduct protocol surveys for the federally threatened vernal pool fairy shrimp and the federally endangered Riverside fairy shrimp each year of construction in areas subject to project disturbance. Surveys can only be suspended upon written authorization from the USFWS/CDFG and the CPUC. SCE shall retain a CPUC approved biologist holding the required 10(a)(1)(A) recovery permit from the USFWS to conduct surveys within all potential fairy shrimp habitat found within the project footprint including, but not limited to, seasonal/ephemeral wetlands, swales, large road ruts and known vernal pool habitat. Surveys shall follow the guidelines set forth by the USFWS in the Interim Survey Guidelines to Permittees for Recovery Permits under Section 10(a)(1)(A) of the Endangered Species Act (ESA) for Listed Vernal Pool Branchiopods. Within 90 days of the completion of surveys, a report shall be submitted to the CPUC detailing the results of each survey event.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-73	Mitigation Measure **BIO-13 Avoid Seasonal Depressions and Known Waterbodies** in its entirety.	As required for inclusion in the WRCMSHCP, two consecutive years for wet and dry fairy season surveys were conducted, all yielding negative results. Per the WRCMSHCP, no additional surveys are required and previously stated mitigation measures would be sufficient for avoiding impacts to special status fairy shrimp. Therefore, SCE requests removing Mitigation Measure BIO-13 in its entirety as follows: "~~**BIO-13 Avoid Seasonal Depressions and Known Waterbodies.** All known seasonal/ephemeral depressions, vernal pools and known water bodies (refer to EIR Figures C.5-2a to C.5-2g) that have been verified or have the potential to be occupied by listed fairy shrimp shall be shown on all applicable construction plans. SCE shall avoid all seasonal/ephemeral depressions, vernal pools and known waterbodies that occur within the project site to minimize impacts to listed fairy shrimp. A 100-foot buffer shall be placed around all seasonal/ephemeral depressions, vernal pools and known waterbodies that have the potential to, but do not presently support listed fairy shrimp, to prevent equipment from entering these areas. If, after conducting surveys according to the methods described above under Mitigation Measure BIO-12, areas identified as potential habitat have been verified to not contain listed fairy shrimp, the 100-foot buffer can be removed. All vernal pools, seasonal depressions and known waterbodies containing documented populations of listed fairy shrimp shall require a 250-foot buffer. These buffers shall be shown on all applicable construction plans (with a highly visible method easily identifiable by construction workers in the field). On-site delineation of this buffer shall be in place prior to the commencement of construction activities. The method used for delineation shall be kept in good working order for the duration of the construction period. If avoidance of known populations of listed fairy shrimp is not possible, consultation with the USFWS regarding the potential impacts to the species will be necessary~~."

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-74	Mitigation Measure **BIO-14 Compensate for Impacts to Vernal Pool or Riverside Fairy Shrimp Habitat** in its entirety.	As required for inclusion in the WRCMSHCP, two consecutive years for wet and dry fairy season surveys were conducted, all yielding negative results. Therefore, vernal pool habitat does not occur within the project impact area and compensatory mitigation is not required. Thus, SCE requests that Mitigation Measure BIO-14 be replaced in its entirety with the following: "~~**BIO-14 Compensate for Impacts to Vernal Pool or Riverside Fairy Shrimp Habitat.** If VSSP impacts will result in impacts to habitat for, or result in the loss of, vernal pool or Riverside fairy shrimp SCE, as indicated above, will be required to consult with the USFWS. If suitable or occupied habitat cannot be avoided, SCE shall consult the USFWS and obtain the appropriate take authorizations or permits prior to site mobilization activities. SCE shall also implement any conservation measures contained within these permits. To compensate for impacts, the USFWS will require both a preservation and creation component for compensation as follows: **Preservation component –** For every acre of habitat directly or indirectly affected, at least two vernal pool credits will be dedicated within a USFWS approved ecosystem preservation bank, or, based on USFWS evaluation of site-specific conservation values, three acres of vernal pool habitat may be preserved on the project site or on another non-bank site as approved by the USFWS.~~ ~~**Creation component –** For every acre of habitat directly affected, at least one vernal pool creation credit will be dedicated within a USFWS approved habitat mitigation bank, or, based on USFWS evaluation of site-specific conservation values, two acres of vernal pool habitat will be created and monitored on the project site or on another non-bank site as approved by the USFWS. Take of suitable or occupied habitat may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP. Documentation of participation and compliance with the MSHCP, including mitigation fee payment confirmation, shall be provided to the CPUC prior site mobilization activities.~~ SCE has committed to becoming a PSE with the WRMSHCP. Impacts to vernal pool or Riverside fairy shrimp will be mitigated through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including mitigation fee payment confirmation, shall be submitted to the CPUC prior to site mobilization activities."

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-75	Beginning with the first paragraph, "Impacts to SKR resulting from the VSSP would be considered significant without mitigation. To reduce and/or avoid impacts to SKR, Mitigation BIO-15 (*Complete Focused Pre-construction Stephens' Kangaroo Rat (SKR) Burrow/Precinct Surveys and Implement Avoidance Measures)* and BIO-16 (*Compensate for Permanent Impacts to Stephens' Kangaroo Rat)* would require focused surveys prior to VSSP site disturbance and provide for compensation for impacts to suitable habitat or loss of individuals. In addition, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program), BIO-2 (ImplementBest Management Practices)*, BIO-3 (*Compensation for Permanent Impacts to Sensitive VegetationCommunities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, and BIO-5 (*Implement Biological Construction Monitoring)* would be required. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would minimize impacts to SKR to the extent possible and reduce impacts to a less than significant level (Class II). If SCE becomes a PSE in the MSHCP and/or a participating member of the RCHCA HCP for SKR additional measures to mitigate the proposed Project's impacts to SKR, above and beyond those described below, may be required. ***Mitigation Measures for Impact BIO-9*** **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** **BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.** **BIO-5 Implement Biological Construction Monitoring."**	Per APM BIO, 5 SCE will participate in the Stephens' Kangaroo Rat HCP through an agreement with the Riverside County Habitat Conservation Agency (Riverside County, 1996). A SCE qualified biologist will conduct preconstruction surveys (see APM BIO-1) in suitable habitat for Stephens' kangaroo rat at specific work areas along the Proposed Project for impact avoidance and minimization. Stephens' kangaroo rat observations and avoidance measures will be reported to the appropriate wildlife agencies prior to construction in that area. In addition, appropriate agencies will be provided a monthly report summarizing all special status species observations and avoidance measures. By participating in the SKR HCP, SCE will not be required to seek separate "take" authorization or provide separate mitigation for this species outside of the auspices of the SKR HCP. Therefore, SCE is recommending the following revisions to this section. "Impacts to SKR resulting from the VSSP would be considered significant without mitigation. To reduce and/or avoid impacts to SKR, Mitigation BIO-15 (*Complete Focused Pre-construction Stephens' Kangaroo Rat (SKR) Burrow/Precinct Surveys and Implement Avoidance Measures)* and ~~BIO-16 (*Compensate for Permanent Impacts to Stephens' Kangaroo Rat)* would require focused surveys prior to VSSP site disturbance and provide for compensation for impacts to suitable habitat or loss of individuals. In addition, Mitigation Measures~~ BIO-1 *(Implement a Worker Environmental Education Program), BIO-2 (ImplementBest Management Practices),* ~~BIO-3 (*Compensation for Permanent Impacts to Sensitive VegetationCommunities),~~ BIO-4 ~~*(Develop a Habitat Restoration and Monitoring Plan),* and BIO-5 (*Implement Biological Construction Monitoring)~~* would be required. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would minimize impacts to SKR to the extent possible and reduce impacts to a less than significant level (Class II). ~~If SCE becomes a PSE in the MSHCP and/or a~~ As a participating member of the RCHCA HCP for SKR additional measures to mitigate the proposed Project's impacts to SKR, above and beyond those described below, may be required. ***Mitigation Measures for Impact BIO-9*** **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** ~~**BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.**~~ ~~**BIO-5 Implement Biological Construction Monitoring.**~~**"** **(see next page)**

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)		**BIO-15 Complete Focused Pre-construction Stephens' Kangaroo Rat (SKR) Burrow/Precinct Surveys and Implement Avoidance Measures.** No more than 30 days prior to commencement of ground disturbing activities, SCE shall retain a qualified and permitted biologist, approved by the CPUC, to conduct pre-construction surveys for SKR. If active SKR burrows/precincts are present, they shall be flagged, with ground-disturbing activities to be setback a minimum of 100 feet from each active burrow/precinct. The setback shall be delineated in the field in such a method that it is easily visible by all construction personnel and no work will be allowed within the setback areas (for th e duration of the VSSP) until authorized by the USFWS, CDFW, and the CPUC. The biological monitor shall periodically field check the mapped burrows/precincts to buffer delineation and that flagging are all in good working order. All active burrows/precincts shall be mapped and incorporated into a GIS based figure for use by the on-site monitors and construction crews. Figures shall include each mapped burrow/precinct and buffer utilizing a highly visible method easily identifiable by construction workers and monitors in the field. Prior to the completion of the VSSP a final monitoring report shall be submitted to the CPUC, CDFW and USFWS. Avoidance of burrows/precincts is mandatory. If SCE determines that construction activities will require work within the setback areas noted above they must provide documentation of a take permit and biological opinion from the CDFW and USFWS respectively. Take of individual SKR may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP and/or is an approved participant in the Riverside County Habitat Conservation Agency HCP for SKR. Documentation of participation with either the MSHCP or SKR HCP shall be provided to the CPUC prior to any take of this species."	**BIO-15 Complete Focused Pre-construction Stephens' Kangaroo Rat (SKR) Burrow/Precinct Surveys and Implement Avoidance Measures.** No more than 30 days prior to commencement of ground disturbing activities, SCE shall retain a qualified and permitted biologist~~, approved by the CPUC~~, to conduct pre-construction surveys for SKR. If active SKR burrows/precincts are present, they shall be flagged~~, with ground-disturbing activities to be setback a minimum of 100 feet from each active burrow/precinct. The setback shall be delineated in the field in such a method that it is easily visible by all construction personnel and no work will be allowed within the setback areas (for the duration of the VSSP) until authorized by the USFWS, CDFW, and the CPUC.~~ The biological monitor shall periodically field check the mapped burrows/precincts to buffer delineation and that flagging are all in good working order. All active burrows/precincts shall be mapped and incorporated into a GIS based figure for use by the on-site monitors and construction crews. Figures shall include each mapped burrow/precinct and buffer utilizing a highly visible method easily identifiable by construction workers and monitors in the field. ~~Prior to the completion of the VSSP a final monitoring report shall be submitted to the CPUC, CDFW and USFWS. Avoidance of burrows/precincts is mandatory. If SCE determines that construction activities will require work within the setback areas noted above they must provide documentation of a take permit and biological opinion from the CDFW and USFWS respectively. Take of individual SKR may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP and/or is an approved participant in the Riverside County Habitat Conservation Agency HCP for SKR. Documentation of participation with either the MSHCP or SKR HCP shall be provided to the CPUC prior to any take of this species."~~

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-76	Mitigation Measures **BIO-16 Compensate for Permanent Impacts to Stephens' Kangaroo Rat** and **BIO-17 Preparation of a Habitat Mitigation and Monitoring Plan** in their entireties.	Per APM Bio 5 SCE will apply to participate in the Stephens' Kangaroo Rat HCP through an agreement with the Riverside County Habitat Conservation Agency (Riverside County, 1996). A SCE qualified biologist will conduct preconstruction surveys (see APM BIO-1) in suitable habitat for Stephens' kangaroo rat at specific work areas along the proposed Project for impact avoidance and minimization. Stephens' kangaroo rat observations and avoidance measures will be reported to the appropriate wildlife agencies prior to construction in that area. In addition, appropriate agencies will be provided a monthly report summarizing all special status species observations and avoidance measures. By participating in the SKR HCP, SCE will not be required to seek take authorization or complete compensatory mitigation for this species, therefore, SCE is recommending removal of Mitigation Measures BIO-16 and BIO 17 in their entireties. ~~"**BIO-16 Compensate for Permanent Impacts to Stephens' Kangaroo Rat.** Based on the results of the SKR surveys (refer to Mitigation Measure BIO-15) SCE may be required to compensate for impacts to occupied habitat or individual species. If SCE determines that construction activities must occur within occupied habitat, and they have obtained the required take permit and biological opinion (as noted above under Mitigation Measure BIO-15), they shall be required to compensate for impacts to SKR. To compensate for permanent impacts to this species SCE shall acquire parcels of land at the ratios described below.~~ ~~Parcels shall be acquired at a 4:1 ratio for impacts to SKR. If the acquired lands for other species, such as burrowing owl or coastal California gnatcatcher, can be managed to support SKR the proposed mitigation lands could be aggregated so the purchase of mitigation lands for one species could cover a portion of the mitigation requirements for the remaining species. Mitigation lands must not already be public land and shall be located within the Western Riverside County. A conservation easement would need to be recorded on all property associated with the mitigation lands as to protect the existing biological resources in perpetuity.~~ ~~A conservation easement could be held by CDFW or an approved land management entity and shall be recorded immediately upon the dedication or acquisition of the land. Preserved or acquired mitigation lands will be monitored and maintained per the requirements set forth in the Habitat Mitigation and Monitoring Plan prepared for the project and discussed below under Mitigation Measure BIO-17. The location of all lands proposed for mitigation land must be submitted to the CPUC, for review and approval, prior to start of construction mobilization activities.~~ ~~If SCE becomes a PSE and implements the requirements of the MSHCP and/or is an approved participant in the RCHCA HCP for SKR compensation for impacts to SKR may be accomplished through participation and implementation of the MSHCP and Riverside County Habitat Conservation Agency HCP requirements. Documentation of participation and compliance with these plans, including mitigation fee payment confirmation, shall be submitted to the CPUC prior to site mobilization activities.~~ **(see next page)**

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

C.5.4.2 (cont.)			**BIO-17 Preparation of a Habitat Mitigation and Monitoring Plan.** To ensure the success of on-site preserved land and acquired mitigation lands, required for compensation of permanent impacts to vegetative communities and listed or Special-Status plants and wildlife, SCE shall retain a CPUC approved/qualified biologist to prepare a Habitat Mitigation and Monitoring Plan (HMMP). The HMMP will be submitted to the CPUC for approval prior to the start of construction mobilization activities. Prior to the end of VSSP construction final impact acreages must be presented to the CPUC and acquisition of off-site lands must be verified. The HMMP will include, at a minimum, the following information: a. Summary of anticipated habitat impacts and the proposed mitigation. b. Detailed description of the location and boundaries of undisturbed project areas (i.e., areas supporting dot-seed plantain) proposed for c. Discussion of measures to be undertaken to enhance (e.g., through focused management) the on-site preserved habitat and off-site mitigation lands for listed and special-status species d. Dedication of adequate funds consistent with the PAR analysis required for CDFW and USFWS permit requirements. e. Description of management and maintenance measures (e.g., managed grazing, fencing maintenance, etc.) f. Discussion of habitat and species monitoring measures for on-site preservation areas and off-site mitigation lands, including specific, objectives, performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. g. Development of a monitoring strategy, which shall serve to document the persistence of SKR (Quino checkerspot, burrowing owl, and other species if applicable) populations within the VSSP site. This monitoring will be conducted for a minimum of 5 years after the completion of construction activities. The strategy should include, at the minimum, the following: 1. Documentation of pre-project population levels for the species noted above, based on results of focused pre-construction surveys and previously supplied applicant data. 2. On-going monitoring of species populations upon completion of construction activities, while the project is in operation, for a minimum of three years. 3. Monitoring of reference populations for each of these species in areas that contain undisturbed habitat, such as the Carrizo Plain National Monument. 4. An analysis of the comparison of percent changes in population levels at the project and reference sites to be used in the determination of additional compensatory mitigation. j. SCE shall prepare a contingency plan for mitigation elements that do not meet performance or final success criteria within 5 years. This plan will include specific triggers for remediation if performance criteria are not being met and a description of the process by which remediation of problems with the mitigation site (e.g., presence of noxious weeds) will occur. SCE (in consultation with the land trust/agency that holds conservation easements on mitigation lands) is responsible for the monitoring of the mitigation lands during VSSP construction and for 3 years after the completion of construction. Thereafter, mitigation lands shall be monitored at least once per year by the land trust/agency that holds the conservation easements. Monitoring reports shall be submitted to the CPUC annually. If SCE becomes a PSE and implements the requirements of the MSHCP, and/or is an approved participant in the RCHCA HCP for SKR compensation, impacts to SKR may be accomplished through participation and implementation of the MSHCP and RCHCA HCP requirements thus precluding the need for any on-site mitigation or off-site acquisition of lands. Documentation of participation and compliance with these plans, including mitigation fee payment confirmation,shall be submitted to the CPUC prior to site mobilization activities."

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

C.5.4.2	C.5-78	Last paragraph: "Therefore, to reduce and/or avoid impacts to listed plant species or their habitats, Mitigation Measure BIO-18 *(Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants and Implementation of Avoidance Measures)* and BIO-19 *(Compensate for Impacts to State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants)* would require focused surveys prior to VSSP site disturbance and provides compensation for unavoidable impacts. In addition, Mitigation Measures BIO-1 (*Implement a Worker Environmental Education Program)*, BIO-2 (*Implement Best Management Practices)*, BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan), BIO-5 (Implement Biological Construction Monitoring)*, and BIO-17 *(Preparation of a Habitat Mitigation and Monitoring Plan)* have been identified to further reduce potential impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Mitigation and Monitoring Plan, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would minimize impacts to listed plant species to the extent possible and reduce impacts to a less-than-significant level (Class II).	Focused surveys were conducted for the Narrow Endemic plant species in 2012, 2013, 2014, and 2015. One Narrow Endemic plant species, San Diego ambrosia, was observed within the most southern Survey Area of Segment 2 of the Proposed Project, just north of Santa Gertrudis Creek and Nicolas Road. This portion of Segment 2 also overlaps the designated USFWS final San Diego ambrosia (Ambrosia pumila) Critical Habitat, specifically, Unit 3: Santa Margarita River Watershed, Subunit A: Santa Gertrudis Creek (USFWS 2010b). Surveys have found a population of San Diego ambrosia occupied by approximately 17,000 individuals on clay soils in non-native grassland. Based on the location with Critical Habitat and condition of habitat, this population of San Diego Ambrosia is of long term conservation value to the species in the region. Construction in this portion of Segment 2 will consist of reconductoring on existing transmission facilities with minimal ground disturbance. It is not anticipated that earth moving or removal will take place. Direct permanent and temporary impacts to San Diego ambrosia are not anticipated to occur during construction; all existing populations are located outside of permanent and temporary impact areas (Appendix A, Exhibit 7). However, two population polygons are located near a permanent impact area (255 individuals approximately 14 feet southeast of Pole 4402070E) and within an existing access road (116 individuals approximately 18 feet northwest of Pole 4402070E). Soil compaction, alteration of hydrology, introduction of non-native species, and direct crushing of individuals could occur during reconductoring activities. During the construction planning process, SCE would define placement of specific reconductoring activities to avoid the individually mapped San Diego ambrosia patches and implement avoidance and minimization measures to prevent direct and indirect impacts to this species. If individuals cannot be avoided, SCE would address potential impacts to these species as a PSE under the provisions of the MSHCP. SCE has committed to becoming a PSE with the WRMSHCP, therefore SCE requests the following changes: "Therefore, to reduce and/or avoid impacts to listed plant species covered by the MSHCP or their habitats, Mitigation Measure BIO-18 *(Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants and Implementation of Avoidance Measures)* ~~and BIO-19 *(Compensate for Impacts to State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants)* would require focused surveys prior to VSSP site disturbance and provides compensation for unavoidable impacts. In addition, Mitigation Measures~~ BIO-1 (*Implement a Worker Environmental Education Program)*, BIO-2 (*Implement Best Management Practices)*, ~~BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan),*~~ *BIO-5 (Implement Biological Construction Monitoring)*, ~~and BIO-17 *(Preparation of a Habitat Mitigation and Monitoring Plan)*~~ have been identified to further reduce potential impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, ~~development of a Habitat Mitigation and Monitoring Plan,~~ and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would minimize impacts to listed plant species to the extent possible and reduce impacts to a less-than-significant level (Class II). **(see next page)**

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Comment Set D1 – Southern California Edison (cont.)

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SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)		If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to listed plant species, above and beyond those described below, may be required. ***Mitigation Measures for Impact BIO-10*** **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** **BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.** **BIO-5 Implement Biological Construction Monitoring.** **BIO-17 Preparation of a Habitat Mitigation and Monitoring Plan.** **BIO-18 Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants and Implementation of Avoidance Measures.** Prior to initial ground disturbance and for undisturbed areas in subsequent construction years, SCE shall conduct pre-construction surveys for State and federally listed Threatened and Endangered, Proposed, Petitioned, and Candidate plants in all areas subject to ground-disturbing activity, including, but not limited to, tower/pole locations, construction areas, assembly yards, and areas subject to grading for new access roads. The surveys shall be conducted during the appropriate blooming period(s) by a qualified plant ecologist/biologist, approved by the CPUC, according to protocols established by the USFWS, CDFW, and California Native Plant Society (CNPS). All listed plant species found shall be marked and avoided. Any populations of special-status plants found during surveys will be fully described, mapped, and a CNPS Field Survey Form or written equivalent shall be prepared. These surveys must be accomplished during a year in which rainfall totals are at least 80% of average and in which the temporal distribution of rainfall is not highly abnormal (e.g., with the vast majority of rainfall occurring very early or late in the season) to be reasonably certain of the presence/absence of rare plant species, unless surveys of reference populations document that precipitation conditions would not have adversely affected the ability to detect the species. If a listed plant species cannot be avoided, consultation with USFWS and CDFW will occur.	~~If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to listed plant species, above and beyond those described below, may be required.~~ ***Mitigation Measures for Impact BIO-10*** **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** **~~BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.~~** **~~BIO-5 Implement Biological Construction Monitoring.~~** **~~BIO-17 Preparation of a Habitat Mitigation and Monitoring Plan.~~** **BIO-18 Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants and Implementation of Avoidance Measures.** Prior to initial ground disturbance and for undisturbed areas in subsequent construction years, SCE shall conduct pre-construction surveys for State and federally listed Threatened and Endangered, Proposed, Petitioned, and Candidate plants in all areas subject to ground-disturbing activity, including, but not limited to, tower/pole locations, construction areas, assembly yards, and areas subject to grading for new access roads. The surveys shall be conducted during the appropriate blooming period(s) by a qualified plant ecologist/biologist, approved by the CPUC, according to protocols established by the USFWS, CDFW, and California Native Plant Society (CNPS). All listed plant species found shall be marked and avoided. Any populations of special-status plants found during surveys will be fully described, mapped, and a CNPS Field Survey Form or written equivalent shall be prepared. ~~These surveys must be accomplished during a year in which rainfall totals are at least 80% of average and in which the temporal distribution of rainfall is not highly abnormal (e.g., with the vast majority of rainfall occurring very early or late in the season) to be reasonably certain of the presence/absence of rare plant species, unless surveys of reference populations document that precipitation conditions would not have adversely affected the ability to detect the species. If a listed plant species cannot be avoided, consultation with USFWS and CDFW will occur.~~ **(see next page)**

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SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)		Prior to excavation and grading activities or vegetation removal, any populations of listed plant species identified during the surveys within the VSSP limits and beyond, shall be protected and a buffer zone placed around each population. The buffer zone shall be established around these areas and shall be of sufficient size to eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. The size of the buffer depends upon the proposed use of the immediately adjacent lands, and includes consideration of the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, physical and chemical characteristics of soils) that are identified by the qualified plant ecologist and/or botanist. The buffer for herbaceous and shrub species shall be, at minimum, 50 feet from the perimeter of the population or the individual. A smaller buffer may be established, provided there are adequate measures in place to avoid the take of the species, with the approval of the USFWS, CDFW, and the CPUC. Where impacts to listed plants are determined to be unavoidable, the USFWS and/or CDFW shall be consulted for authorization. Additionalmitigation measures to protect or restore listed plant species or their habitat, including but not limited to a salvage plan including seed collection and replanting, may be required by the USFWS or CDFW before impacts are authorized, whichever is appropriate. Take of State and federally listed Threatened and Endangered, Proposed, Petitioned, and Candidate plants may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP. Documentation of participation with the MSHCP shall be provided to the CPUC prior to any take of this species."	Prior to excavation and grading activities or vegetation removal, any populations of listed plant species identified during the surveys within the VSSP limits and beyond, shall be protected and a buffer zone placed around each population where feasible. The buffer zone shall be established around these areas and shall be of sufficient size to eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. The size of the buffer depends upon the proposed use of the immediately adjacent lands, and includes consideration of the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, physical and chemical characteristics of soils) that are identified by the qualified plant ecologist and/or botanist. ~~The buffer for herbaceous and shrub species shall be, at minimum, 50 feet from the perimeter of the population or the individual. A smaller buffer may be established, provided there are adequate measures in place to avoid the take of the species, with the approval of the USFWS, CDFW, and the CPUC.~~ ~~Where impacts to listed plants are determined to be unavoidable, the USFWS and/or CDFW shall be consulted for authorization. Additional mitigation measures to protect or restore listed plant species or their habitat, including but not limited to a salvage plan including seed collection and replanting, may be required by the USFWS or CDFW before impacts are authorized, whichever is appropriate.~~ Take of State and federally listed Threatened and Endangered, species is not expected. During the construction planning process, SCE would define placement of specific reconductoring activities to avoid the individually mapped San Diego ambrosia patches and implement avoidance and minimization measures to prevent direct and indirect impacts to this species. If individuals cannot be avoided, SCE would address potential impacts to these species as a PSE under the provisions of the MSHCP. ~~Proposed, Petitioned, and Candidate plants may be covered by the MSHCP if SCE becomes a PSE and implements the requirements of the MSHCP.~~ Documentation of participation with the MSHCP shall be provided to the CPUC prior to any take of this species."

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-80	Mitigation Measure BIO-19 Compensate for Impacts to State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants in its entirety.	SCE has committed to becoming a PSE with the WRMSHCP. If individuals cannot be avoided, SCE would address potential impacts to these species as a PSE under the provisions of the MSHCP, therefore, SCE requests that Mitigation Measure BIO-19 be removed in its entirety: "~~**BIO-19 Compensate for Impacts to State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants.** To compensate for permanent impacts to State and federally Threatened, Endangered, Proposed, Petitioned and Candidate plants, habitat that is not already public land shall be preserved and managed in perpetuity at a 1:1 mitigation ratio (One acre preserved for each acre impacted). Prior to the disturbance of habitat for or take of listed plant species, SCE will be required to obtain CPUC approval of preserved and/or mitigation lands as well as provide documentation of a recorded conservation easement(s). Compensation for temporary impacts shall include land acquisition and/or preservation at a 0.5:1 ratio. The preserved habitat for a significantly impacted plant species shall be of equal or greater habitat quality to the impacted areas in terms of soil features, extent of disturbance, vegetation structure, and will contain verified extant populations, of the same size or greater, of the State or federally listed plants that are impacted. A conservation easement would need to be recorded on all property associated with the mitigation lands as to protect the existing plant resources in perpetuity. A conservation easement could be held by CDFW or an approved land management entity and shall be recorded immediately upon the dedication or acquisition of the land. Preserved or acquired mitigation lands will be monitored and maintained per the requirements set forth in the Habitat Mitigation and Monitoring Plan prepared for the project, discussed above under Mitigation Measure BIO-17.~~ ~~However, if lands acquired or protected for the compensation of permanent impacts to burrowing owl, SKR, and/or vegetative communities contain similar sized populations of the impacted listed plant species, no further mitigation would be required. The location of all lands proposed for mitigation land must be submitted to the CPUC, for review and approval, prior to the start of construction mobilization activities.~~ ~~If SCE becomes a PSE with the MSHCP this compensation may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including verification of mitigation fee payments, shall be submitted to the CPUC prior to construction mobilization activities.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-81	Last paragraph: "The impacts of the VSSP on this species would be considered significant without mitigation. Therefore, to reduce and/or avoid impacts to western spadefoot toad, Mitigation Measure BIO-20 (*Complete Focused Pre-construction Western Spadefoot Toad Surveys and Implement Avoidance Measures)* would require focused surveys prior to VSSP site disturbance and provides for habitat restoration and relocation of individuals and egg masses. In addition, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 (*Develop a Habitat Restoration and Monitoring Plan), BIO-5 (Implement Biological Construction Monitoring)*, and BIO-13 *(Avoid Seasonal Depressions and Known Waterbodies)* have been identified to further reduce impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting preconstruction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and avoiding known depressions and water bodies. Implementation of these mitigation measures would minimize impacts to western spadefoot toad, to the extent possible, and would reduce impacts to a less-than-significant level (Class II). If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to western spadefoot toad, above and beyond those described below, may be required."	SCE has committed to becoming a PSE with the WRMSHCP. Western spadefoot toad is a species covered by the MSHCP, and through participation in the MSHCP, measures which include, but are not limited to, preconstruction surveys; construction monitoring; implementation of MSHCP BMP measures will ensure impacts are less than significant. Therefore, SCE requests the following changes: "The impacts of the VSSP on this species would be considered significant without mitigation. Therefore, to reduce and/or avoid impacts to western spadefoot toad, Mitigation Measure ~~BIO-20 (*Complete Focused Pre-construction Western Spadefoot Toad Surveys and Implement Avoidance Measures)* would require focused surveys prior to VSSP site disturbance and provides for habitat restoration and relocation of individuals and egg masses. In addition, Mitigation Measures~~ BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, ~~BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 (*Develop a Habitat Restoration and Monitoring Plan),~~ and *BIO-5 (Implement Biological Construction Monitoring)*~~, and BIO-13 *(Avoid Seasonal Depressions and Known Waterbodies)*~~ have been identified to further reduce impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts ~~(including speed limits to control fugitive dust), conducting preconstruction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and avoiding known depressions and water bodies. Implementation of these mitigation measures~~ and implementation of MSHCP BMP measures would minimize impacts to western spadefoot toad, to the extent possible, and would reduce impacts to a less-than-significant level (Class II). ~~If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to western spadefoot toad, above and beyond those described below, may be required.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-82	Beginning with *"Mitigation Measures for Impact BIO-11*: **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** **BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.** **BIO-4 Develop a Habitat Restoration and Monitoring Plan.** **BIO-5 Implement Biological Construction Monitoring.** **BIO-13 Avoid Seasonal Depressions and Known Waterbodies.** **BIO-20 Complete Focused Pre-construction Western Spadefoot Toad Surveys and Implement Avoidance Measures.** Prior the site mobilization, SCE shall retain a CPUC approved/qualified biologist to conduct the following: a. Conduct a pre-construction survey during the appropriate time of year when this species can be detected (i.e., during periods of suitable rainfall that result in pooling or the formation of other aquatic habitat) to determine the presence of western spadefoot toad and related habitat. b. Should the toad and habitat be found, and be impacted by temporary and/or permanent project impacts, a habitat restoration and management plan shall be prepared for review and approval by the County, that addresses the following: 1. Impacted occupied breeding habitat to be replaced, on-site, at a 2:1 ratio. 2. Relocation areas shall be designed as suitable toad habitat, and as far away as feasible from any project related structure or foreseeable construction area (minimum 250 foot buffer from construction activities). 3. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing ponds as feasible. 4. No site preparation or construction activities shall be permitted in the vicinity of any occupied ponds until the design and construction of the relocation habitat in preserved areas of the site has been completed and all western spadefoot toad adults, tadpoles, and egg masses detected are moved to the created pool habitat.	SCE has committed to becoming a PSE with the WRMSHCP. Western spadefoot toad is a species covered by the MSHCP, therefore focused surveys and compensatory mitigation are not required, and SCE requests the following change: *"Mitigation Measures for Impact BIO-11* BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). ~~**BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.**~~ ~~**BIO-4 Develop a Habitat Restoration and Monitoring Plan.**~~ BIO-5 Implement Biological Construction Monitoring. ~~**BIO-13 Avoid Seasonal Depressions and Known Waterbodies.**~~ ~~**BIO-20 Complete Focused Pre-construction Western Spadefoot Toad Surveys and Implement Avoidance Measures.** Prior the site mobilization, SCE shall retain a CPUC approved/qualified biologist to conduct the following:~~ ~~a. Conduct a pre-construction survey during the appropriate time of year when this species can be detected (i.e., during periods of suitable rainfall that result in pooling or the formation of other aquatic habitat) to determine the presence of western spadefoot toad and related habitat. b. Should the toad and habitat be found, and be impacted by temporary and/or permanent project impacts, a habitat restoration and management plan shall be prepared for review and approval by the County, that addresses the following:~~ ~~1. Impacted occupied breeding habitat to be replaced, on-site, at a 2:1 ratio.~~ ~~2. Relocation areas shall be designed as suitable toad habitat, and as far away as feasible from any project related structure or foreseeable construction area (minimum 250 foot buffer from construction activities).~~ ~~3. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing ponds as feasible.~~ ~~4. No site preparation or construction activities shall be permitted in the vicinity of any occupied ponds until the design and construction of the relocation habitat in preserved areas of the site has been completed and all western spadefoot toad adults, tadpoles, and egg masses detected are moved to the created pool habitat.~~ **(see next page)**

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)		5. Restoration areas shall be monitored and maintained until they are shown as successful habitat for the toad, or up to five years. Success criteria shall be proposed. Provisions to make adjustments to remediate problems shall also be included. 6. Permanent protection and management of restoration areas (e.g., conservation easement or fee title purchase, etc.). Annually, for the duration of construction activities and based on appropriate rainfall and temperatures (generally between the months of February and April) the biologist shall conduct a series of pre-construction surveys in all appropriate vegetation communities within the project footprint. Surveys will include evaluation of all previously documented occupied areas and a reconnaissance level survey of the remaining natural areas of the site. All western spadefoot adults, tadpoles, and egg masses encountered shall be collected and released in the identified/created restoration ponds described above. If SCE becomes a PSE with the MSHCP, this habitat restoration and management may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including mitigation fee payment verification, shall be submitted to the CPUC prior to site mobilization activities."	~~5. Restoration areas shall be monitored and maintained until they are shown as successful habitat for the toad, or up to five years. Success criteria shall be proposed. Provisions to make adjustments to remediate problems shall also be included.~~ ~~6. Permanent protection and management of restoration areas (e.g., conservation easement or fee title purchase, etc.). Annually, for the duration of construction activities and based on appropriate rainfall and temperatures (generally between the months of February and April) the biologist shall conduct a series of pre-construction surveys in all appropriate vegetation communities within the project footprint. Surveys will include evaluation of all previously documented occupied areas and a reconnaissance level survey of the remaining natural areas of the site. All western spadefoot adults, tadpoles, and egg masses encountered shall be collected and released in the identified/created restoration ponds described above.~~ ~~If SCE becomes a PSE with the MSHCP, this habitat restoration and management may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including mitigation fee payment verification, shall be submitted to the CPUC prior to site mobilization activities."~~

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-83	Fifth paragraph: "To reduce and/or avoid impacts to two-striped garter snake, Mitigation Measure BIO-21 *(Conduct Surveys for Two-striped Garter Snakes and Implement Avoidance Measures)* requires focused surveys prior to VSSP site disturbance and provides for relocation of individuals outside of any impact area. In addition, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices)*, BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan), BIO-5 (Implement Biological Construction Monitoring)*, and BIO-13 *(Avoid Seasonal Depressions and Known Waterbodies)* have been identified to further reduce impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, compensation for impacts to riparian habitat, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and avoiding known depressions and water bodies. Implementation of these mitigation measures would minimize impacts to two-striped garter snake to the extent possible and would reduce impacts to a less-than significant level (Class II). If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to two-striped garter snake, above and beyond those described below, may be required."	SCE has committed to becoming a PSE with the WRMSHCP. Two-striped garter snake is a species covered by the MSHCP, therefore focused surveys and compensatory mitigation are not required, and SCE requests the following change: "To reduce and/or avoid impacts to two-striped garter snake, ~~Mitigation Measure BIO-21 *(Conduct Surveys for Two-striped Garter Snakes and Implement Avoidance Measures)* requires focused surveys prior to VSSP site disturbance and provides for relocation of individuals outside of any impact area. In addition,~~ Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices)*, ~~*BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan), BIO-5 (Implement Biological Construction Monitoring)*, and BIO-13 *(Avoid Seasonal Depressions and Known Waterbodies)*~~ have been identified to further reduce impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, ~~compensation for impacts to riparian habitat, development of a Habitat Restoration and Monitoring Plan,~~ conducting biological monitoring during ground disturbing and other construction related activities~~, and avoiding known depressions and water bodies~~. Implementation of these mitigation measures and implementation of MSHCP BMP measures would minimize impacts to two-striped garter snake to the extent possible and would reduce impacts to a less-than significant level (Class II). ~~If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to two-striped garter snake, above and beyond those described below, may be required.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-84	Beginning with ***Mitigation Measures for Impact BIO-12"*** "BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities. BIO-4 Develop a Habitat Restoration and Monitoring Plan. BIO-5 Implement Biological Construction Monitoring. BIO-13 Avoid Seasonal Depressions and Known Waterbodies. BIO-21 Conduct Surveys for Two-striped Garter Snakes and Implement Avoidance Measures. Prior to ground disturbance or vegetation clearing in the VSSP area, SCE shall retain a qualified biologist, approved by the CPUC, to conduct focused surveys for two-striped garter snakes where suitable habitat is present and directly impacted by construction, vehicle access, or maintenance. Focused surveys shall consist of a minimum of four daytime surveys within one week of vegetation clearing. The qualified biologist will be present during all activities immediately adjacent to or within habitat that supports populations of the two-striped garter snake. Clearance surveys for garter snakes shall be conducted by the authorized biologist prior to the initiation of construction each day. Any snakes found within the area of disturbance or potentially affected by by the VSSP will be relocated to the nearest suitable habitat that will not be affected by the VSSP."	SCE has committed to becoming a PSE with the WRMSHCP. Two-striped garter snake is a species covered by the MSHCP, therefore focused surveys are not required, and SCE requests the following change: "BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). ~~BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.~~ ~~BIO-4 Develop a Habitat Restoration and Monitoring Plan.~~ BIO-5 Implement Biological Construction Monitoring. BIO-13 Avoid Seasonal Depressions and Known Waterbodies. ~~BIO-21 Conduct Surveys for Two-striped Garter Snakes and Implement Avoidance Measures. Prior to ground disturbance or vegetation clearing in the VSSP area, SCE shall retain a qualified biologist, approved by the CPUC, to conduct focused surveys for two-striped garter snakes where suitable habitat is present and directly impacted by construction, vehicle access, or maintenance. Focused surveys shall consist of a minimum of four daytime surveys within one week of vegetation clearing. The qualified biologist will be present during all activities immediately adjacent to or within habitat that supports populations of the two-striped garter snake. Clearance surveys for garter snakes shall be conducted by the authorized biologist prior to the initiation of construction each day. Any snakes found within the area of disturbance or potentially affected by by the VSSP will be relocated to the nearest suitable habitat that will not be affected by the VSSP."~~

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-85	First full paragraph "To reduce and/or avoid impacts to terrestrial herpetofauna, Mitigation Measure BIO-22 *(Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures)* requires focused surveys prior to VSSP site disturbance and provides for relocation of individuals outside of any impact area. In addition, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, *BIO-2 (Implement Best Management Practices)*, BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, *BIO-5 (Implement Biological Construction Monitoring)*, and BIO-13 *(Avoid Seasonal Depressions and Known Waterbodies)* have been identified to further reduce potential impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting preconstruction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and avoiding known depressions and water bodies. Implementation of these mitigation measures would minimize impacts to terrestrial herpetofauna to the extent possible and would reduce impacts to a less-than-significant level (Class II). If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to some species of terrestrial herpetofauna, above and beyond those described below, may be required. ***Mitigation Measures for Impact BIO-13*** BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities. BIO-4 Develop a Habitat Restoration and Monitoring Plan. BIO-5 Implement Biological Construction Monitoring. BIO-13 Avoid Seasonal Depressions and Known Waterbodies.	Impacts to herpetofauna will be mitigated through Mitigation Measures BIO 1, 2 and 5, therefore SCE requests the following change: "To reduce and/or avoid impacts to terrestrial herpetofauna, ~~Mitigation Measure BIO-22 *(Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures)* requires focused surveys prior to VSSP site disturbance and provides for relocation of individuals outside of any impact area. In addition,~~ Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, *BIO-2 (Implement Best Management Practices)*, ~~BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*,~~ and *BIO-5 (Implement Biological Construction Monitoring)* ~~, and BIO-13 *(Avoid Seasonal Depressions and Known Waterbodies)*~~ have been identified to further reduce potential impacts. ~~These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting preconstruction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and avoiding known depressions and water bodies.~~ Implementation of these mitigation measures would minimize impacts to terrestrial herpetofauna to the extent possible and would reduce impacts to a less-than-significant level (Class II). ~~If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to some species of terrestrial herpetofauna, above and beyond those described below, may be required.~~ ***Mitigation Measures for Impact BIO-13*** BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). ~~**BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.**~~ ~~**BIO-4 Develop a Habitat Restoration and Monitoring Plan.**~~ BIO-5 Implement Biological Construction Monitoring. ~~**BIO-13 Avoid Seasonal Depressions and Known Waterbodies.**~~ **.(see next page)**

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)		BIO-22 Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures. Prior to ground disturbance or vegetation clearing within the VSSP site, SCE shall retain a CPUC approved/qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access, or maintenance. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present during all activities immediately adjacent to or within habitat that supports terrestrial herpetofauna. Clearance surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of construction each day in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the VSSP will be relocated to the nearest suitable habitat that will not be affected by the VSSP."	~~BIO-22 Conduct Surveys for Terrestrial Herpetofauna and Implement Monitoring, Avoidance, and Minimization Measures.~~ ~~Prior to ground disturbance or vegetation clearing within the VSSP site, SCE shall retain a CPUC approved/qualified biologist to conduct surveys for terrestrial herpetofauna where suitable habitat is present and directly impacted by construction vehicle access, or maintenance. Focused surveys shall consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing. The qualified biologist will be present during all activities immediately adjacent to or within habitat that supports terrestrial herpetofauna. Clearance surveys for terrestrial herpetofauna shall be conducted by the qualified biologist prior to the initiation of construction each day in suitable habitat. Terrestrial herpetofauna found within the area of disturbance or potentially affected by the VSSP will be relocated to the nearest suitable habitat that will not be affected by the VSSP."~~

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-86	Fourth paragraph: "To minimize impacts to bird species, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, *BIO-5 (Implement Biological Construction Monitoring)*, BIO-6 *(Conduct Pre-Construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures)*, BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)*, BIO-8 *(Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow Flycatcher; Avoid Occupied Habitat)*, and BIO-9 (*Conduct Protocol Surveys for Coastal California Gnatcatcher and Avoid Occupied Habitat)* would be required. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Additional measures include: Mitigation Measure NOI-2 *(Implement Best Management Practices for Construction Noise)* that would require the use of noise-suppression techniques, to the extent feasible, during construction and Mitigation Measure BIO-7 (*Prepare and Implement a Nesting Bird Management Plan)* that includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to bird species listed as California Species of Special Concern, CDFW Special Animals, California Fully Protected species, and MSHCP covered species to the extent possible and reduce impacts to a less-than-significant level (Class II)."	SCE has committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP, measures which include, but are not limited to, preconstruction surveys; construction monitoring; and implementation of MSHCP BMP measures will ensure impacts to wildlife are less than significant. Therefore, SCE requests the following change: "To minimize impacts to bird species, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, ~~*BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*,~~ *BIO-5 (Implement Biological Construction Monitoring)*, BIO-6 *(Conduct Pre-Construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures)*, BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)*, ~~*BIO-8 (Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow Flycatcher; Avoid Occupied Habitat)*~~, and ~~BIO-9 (*Conduct Protocol Surveys for Coastal California Gnatcatcher and Avoid Occupied Habitat)*~~ would be required. ~~These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities.~~ Additional measures include: Mitigation Measure NOI-2 *(Implement Best Management Practices for Construction Noise)* that would require the use of noise-suppression techniques, to the extent feasible, during construction and Mitigation Measure BIO-7 (*Prepare and Implement a Nesting Bird Management Plan)* that includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to bird species listed as California Species of Special Concern, CDFW Special Animals, California Fully Protected species, and MSHCP covered species to the extent possible and reduce impacts to a less-than-significant level (Class II)."

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.2	C.5-87	First full paragraph: "If SCE becomes a PSE in the MSHCP, additional measures to mitigate the proposed Project's impacts to bird species listed as California Species of Special Concern, CDFW Special Animals, California Fully Protected species, and MSHCP covered species, above and beyond those described below, may be required. ***Mitigation Measures for Impact BIO-14*** NOI-2 Implement Best Management Practices for Construction Noise. (Section C.12 Noise) BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities. BIO-4 Develop a Habitat Restoration and Monitoring Plan. BIO-5 Implement Biological Construction Monitoring. BIO-6 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures. BIO-7 Prepare and Implement a Nesting Bird Management Plan. BIO-8 Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow flycatcher; Avoid Occupied Habitat. BIO-9 Conduct Protocol Surveys for Coastal California Gnatcatcher and Avoid Occupied Habitat. *Impact BIO-15 (Criterion BIO3): The Project could result in mortality of, and loss of habitat for, Special status bat species. (Class II)*"	SCE has committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP, measures which include, but are not limited to, preconstruction surveys; construction monitoring; and implementation of MSHCP BMP measures will ensure impacts to wildlife are less than significant. By virtue of performing pre-construction surveys, SCE will identify any potential bat roosting habitat, and will implement measures to avoid impacting that habitat. Even if some impacts are unavoidable, SCE's participation in the MSHCP will provide for any necessary mitigation. Therefore, SCE requests the following change: "~~If SCE becomes a PSE in the MSHCP, additional measures to mitigate the proposed Project's impacts to bird species listed as California Species of Special Concern, CDFW Special Animals, California Fully Protected species, and MSHCP covered species, above and beyond those described below, may be required.~~ ***Mitigation Measures for Impact BIO-14*** NOI-2 Implement Best Management Practices for Construction Noise. (Section C.12 Noise) BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). ~~BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.~~ ~~BIO-4 Develop a Habitat Restoration and Monitoring Plan.~~ BIO-5 Implement Biological Construction Monitoring. BIO-6 Conduct Pre-construction Surveys for Nesting and Breeding Birds and Implement Avoidance Measures. BIO-7 Prepare and Implement a Nesting Bird Management Plan. ~~BIO-8 Conduct Protocol Surveys for Least Bell's Vireo, Southwestern Willow Flycatcher, and Willow flycatcher; Avoid Occupied Habitat.~~ ~~BIO-9 Conduct Protocol Surveys for Coastal California Gnatcatcher and Avoid Occupied Habitat.~~ ~~*Impact BIO-15 (Criterion BIO3): The Project could result in mortality of, and loss of habitat for, Special status bat species. (Class II)*"~~	D1-83
C.5.4.2	C.5-88	Second paragraph: "Implementation of the VSSP would not prevent bats from foraging in the VSSP area. The proposed Project, however, may result in the loss of known maternity sites or roosting trees should they occur; there are no currently identified maternity sites within the VSSP site."	The sentence contradicts itself. No roosting sites were identified during a desktop review and field surveys. Therefore, SCE requests the following change: "Implementation of the VSSP would not prevent bats from foraging in the VSSP area, and~~.~~ ~~The proposed Project, however, may result in the loss of known maternity sites or roosting trees should they occur;~~ currently there are no ~~currently~~ identified maternity sites within the VSSP site."	D1-84

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-88	Third paragraph: "To minimize impacts to special-status bats, Mitigation Measure BIO-23 (*Survey for Maternity Colonies or Hibernaculum for Roosting Bats)* requires surveys for bats prior to ground disturbing activities or vegetation removal and identification of alternative roost sites should eviction be required. Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, *BIO-2 (Implement Best Management Practices)*, BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, and BIO-5 *(Implement Biological Construction Monitoring)* have also been identified to further reduce potential impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. In addition, Mitigation Measure NOI-2 *(Implement Best Management Practices for Construction Noise)* would require the use of noise-suppression techniques, to the extent feasible, during construction and Mitigation Measure BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to special-status bats to the extent possible and reduce impacts to a less-than-significant level (Class II). ***Mitigation Measures for Impact BIO-15*** NOI-2 Implement Best Management Practices for Construction Noise. (Section C.12 Noise) BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities. BIO-4 Develop a Habitat Restoration and Monitoring Plan. BIO-5 Implement Biological Construction Monitoring. BIO-7 Prepare and Implement a Nesting Bird Management Plan.	No roosting sites were identified during desktop review and field survey; SCE has committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP, measures which include, but are not limited to, preconstruction surveys; construction monitoring; and implementation of MSHCP BMP measures will ensure impacts to wildlife are less than significant. By virtue of performing pre-construction surveys, SCE will identify any potential bat roosting habitat, and will implement measures to avoid impacting that habitat. Even if some impacts are unavoidable, SCE's participation in the MSHCP will provide for any necessary mitigation. Therefore, SCE requests the following change: "To minimize impacts to special-status bats, Mitigation Measure ~~*BIO-23 (Survey for Maternity Colonies or Hibernaculum for Roosting Bats)* requires surveys for bats prior to ground disturbing activities or vegetation removal and identification of alternative roost sites should eviction be required. Mitigation Measures~~ BIO-1 *(Implement a Worker Environmental Education Program)*, *BIO-2 (Implement Best Management Practices)*, ~~*BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*,~~ and BIO-5 *(Implement Biological Construction Monitoring)* have ~~also~~ been identified to further reduce potential impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, ~~development of a Habitat Restoration and Monitoring Plan,~~ conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. In addition, Mitigation Measure NOI-2 *(Implement Best Management Practices for Construction Noise)* would require the use of noise-suppression techniques, to the extent feasible, during construction and Mitigation Measure BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to special-status bats to the extent possible and reduce impacts to a less-than-significant level (Class II). ***Mitigation Measures for Impact BIO-15*** NOI-2 Implement Best Management Practices for Construction Noise. (Section C.12 Noise) BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). ~~**BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.**~~ ~~**BIO-4 Develop a Habitat Restoration and Monitoring Plan.**~~ BIO-7 Prepare and Implement a Nesting Bird Management Plan. **(see next page)**

D1-85

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)		BIO-23 Survey for Maternity Colonies or Hibernaculum for Roosting Bats. Prior to ground disturbance or vegetation clearing at all VSSP locations, SCE shall retain a qualified biologist, approved by the CPUC, to conduct surveys for sensitive bats. Surveys shall be conducted no more than 15 days prior to grading near or the removal of trees or other structures. Surveys shall also be conducted during the maternity season (1 March to 31 July) within 300 feet of VSSP activities. If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not removed), if feasible. If avoidance of the maternity roost is not feasible the qualified biologist will implement the following actions. •**Maternity roosts.** If a maternity roost will be impacted by the VSSP, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be provided on, or in close proximity to, the VSSP site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bats requirements in coordination with CDFW. By making the roosting habitat available prior to eviction, the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall be notified of any hibernacula or active nurseries within the construction zone. •**Exclusion of bats prior to eviction from roosts.** If non-breeding bat hibernacula are found in trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern California. This action should allow all bats to leave during the course of one week. Roosts that need to be removed in situations where the use of one-way doors is not necessary in the judgment of the qualified biologist shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal)."	~~BIO-23 Survey for Maternity Colonies or Hibernaculum for Roosting Bats. Prior to ground disturbance or vegetation clearing at all VSSP locations, SCE shall retain a qualified biologist, approved by the CPUC, to conduct surveys for sensitive bats. Surveys shall be conducted no more than 15 days prior to grading near or the removal of trees or other structures. Surveys shall also be conducted during the maternity season (1 March to 31 July) within 300 feet of VSSP activities. If active maternity roosts or hibernacula are found, the structure, tree or tower occupied by the roost shall be avoided (i.e., not removed), if feasible. If avoidance of the maternity roost is not feasible the qualified biologist will implement the following actions.~~ ~~•Maternity roosts. If a maternity roost will be impacted by the VSSP, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be provided on, or in close proximity to, the VSSP site no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bats requirements in coordination with CDFW. By making the roosting habitat available prior to eviction, the colony will have a better chance of finding and using the roost. Alternative roost sites must be of comparable size and proximal in location to the impacted colony. The CDFW shall be notified of any hibernacula or active nurseries within the construction zone.~~ ~~•Exclusion of bats prior to eviction from roosts. If non-breeding bat hibernacula are found in trees scheduled to be removed, the individuals shall be safely evicted, under the direction of a qualified biologist, by opening the roosting area to allow airflow through the cavity or other means determined appropriate by the bat biologist (e.g., installation of one-way doors). In situations requiring one-way doors, a minimum of one week shall pass after doors are installed and temperatures should be sufficiently warm for bats to exit the roost because bats do not typically leave their roost daily during winter months in southern California. This action should allow all bats to leave during the course of one week. Roosts that need to be removed in situations where the use of one-way doors is not necessary in the judgment of the qualified biologist shall first be disturbed by various means at the direction of the bat biologist at dusk to allow bats to escape during the darker hours, and the roost tree shall be removed or the grading shall occur the next day (i.e., there shall be no less or more than one night between initial disturbance and the grading or tree removal)."~~

D1-85 cont.

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-89	***"Impact BIO-16 (Criterion BIO3): The Project could result in mortality of, and loss of habitat for, small mammals designated as California Species of Special Concern or MSHCP covered species. (Class II)*** A total of seven special-status mammal species were detected within or adjacent to the VSSP during surveys conducted from 2012 – 2014. Species detected included San Diego black-tailed jack rabbit, San Diego desert woodrat, northwestern San Diego pocket mouse, and Los Angeles pocket mouse, all California Species of Special Concern and MSHCP covered species. Southern grasshopper mouse, a CDFW Species of Special Concern, was also detected within the VSSP site. Although not detected American badger and dulzura pocket mouse (*Chaetodipus californicus femoralis*), both California Species of Special Concern, are known to occur in the general area. Direct impacts to these species would include mechanical crushing by vehicles and construction equipment, trampling, and loss of habitat. Construction disturbance can also result in the flushing of small animals from refugia, which increases the predation risk for small rodents. Indirect impacts include exposure to fugitive dust, alteration of soils, such as compaction, that could preclude burrowing and the spread of exotic weeds, and increased noise levels. Because the VSSP would remove or disturb vegetation and these animals would be subject to mortality from construction activities, impacts to these species would be considered significant absent mitigation."	Direct impacts related to VSSP would be temporary and concentrated in previously disturbed areas, minimal habitat would be permanently removed, and both direct and indirect impacts are mitigated through participation in the MSHCP, measures which include, but are not limited to, preconstruction surveys; construction monitoring; and implementation of MSHCP BMP measures will ensure impacts to wildlife are less than significant. Therefore impacts would not be considered significant. SCE requests the following change: ***"Impact BIO-16 (Criterion BIO3): The Project could result in mortality of, and loss of habitat for, small mammals designated as California Species of Special Concern or MSHCP covered species. (Class II)*** A total of seven special-status mammal species were detected within or adjacent to the VSSP during surveys conducted from 2012 – 2014. Species detected included San Diego black-tailed jack rabbit, San Diego desert woodrat, northwestern San Diego pocket mouse, and Los Angeles pocket mouse, all California Species of Special Concern and MSHCP covered species. Southern grasshopper mouse, a CDFW Species of Special Concern, was also detected within the VSSP site. Although not detected American badger and dulzura pocket mouse (*Chaetodipus californicus femoralis*), both California Species of Special Concern, are known to occur in the general area. Direct impacts to these species would include mechanical crushing by vehicles and construction equipment, trampling, and loss of habitat. Construction disturbance can also result in the flushing of small animals from refugia, which increases the predation risk for small rodents. Indirect impacts include exposure to fugitive dust, alteration of soils, such as compaction, that could preclude burrowing and the spread of exotic weeds, and increased noise levels. ~~Because the VSSP would remove or disturb vegetation and these animals would be subject to mortality from construction activities, impacts to these species would be considered significant absent mitigation.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-90	Frist paragraph: "To minimize impacts to special-status mammal species, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, and BIO-5 *(Implement Biological Construction Monitoring)* have been identified. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Mitigation Measures NOI-2 *(Implement Best Management Practices for Construction Noise)* would require the use of noise-suppression techniques, to the extent feasible, during construction and Mitigation Measure BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to special-status mammals to the extent possible and reduce impacts to a less-than-significant level (Class II). *Mitigation Measures for Impact BIO-16* NOI-2 Implement Best Management Practices for Construction Noise. (Section C.12 Noise) BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities. BIO-4 Develop a Habitat Restoration and Monitoring Plan. BIO-5 Implement Biological Construction Monitoring. BIO-7 Prepare and Implement a Nesting Bird Management Plan."	Focused surveys in 2012 and 2014 confirmed the presence of Los Angeles pocket mouse (Perognathus longimembris brevinasus). A total of two LAPM were captured during the 2012 trapping effort in Segment 1 of the Proposed Project and were located east of Briggs Road north of Matthews Road. No LAPM were captured on Segment 2. SCE will address potential impacts to this species via provisions of the MSHCP PSE status. In addition, prior to construction, SCE will conduct habitat assessments for vegetation, soil, and species sign (e.g., suitable burrows) for Los Angeles pocket mouse at specific work areas along the Proposed Project to aid in general impact avoidance and minimization. SCE has committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP, measures which include, but are not limited to, preconstruction surveys; construction monitoring; and implementation of MSHCP BMP measures will ensure impacts to wildlife are less than significant. Therefore, SCE requests the following change: "To minimize impacts to special-status mammal species, Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, ~~BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities),~~ ~~BIO-4 *(Develop a Habitat Restoration and Monitoring Plan),*~~ and BIO-5 *(Implement Biological Construction Monitoring)* have been identified. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, ~~development of a Habitat Restoration and Monitoring Plan,~~ conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. SCE shall address potential impacts to this species via provisions of the MSHCP PSE status. In addition, prior to construction, SCE shall conduct habitat assessments for vegetation, soil, and species sign (e.g., suitable burrows) for Los Angeles pocket mouse at specific work areas along the proposed Project to aid in general impact avoidance and minimization. Mitigation Measures NOI-2 *(Implement Best Management Practices for Construction Noise)* would require the use of noise-suppression techniques, to the extent feasible, during construction and ~~Mitigation Measure BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* includes a noise monitoring component.~~ Implementation of these mitigation measures would minimize impacts to special-status mammals to the extent possible and reduce impacts to a less-than-significant level (Class II). *Mitigation Measures for Impact BIO-16* NOI-2 Implement Best Management Practices for Construction Noise. (Section C.12 Noise) BIO-1 Implement a Worker Environmental Education Program. BIO-2 Implement Best Management Practices (BMPs). ~~BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.~~ ~~BIO-4 Develop a Habitat Restoration and Monitoring Plan.~~ BIO-5 Implement Biological Construction Monitoring. BIO-7 Prepare and Implement a Nesting Bird Management Plan."

D1-87

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-91	Last paragraph: "To minimize impacts to rare plant species, Mitigation Measure BIO-24 *(Conduct Pre-construction Surveys for Special-Status Plants and Implement Avoidance Measures)* and BIO-25 (*Compensate for Impacts to Special-Status Plant Species)* would require pre-construction surveys, implementation of avoidance measures, and compensation for permanent and temporary impacts. The following measures would further reduce impacts: Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 (*Implement Best Management Practices)*, BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, and BIO-5 *(Implement Biological Construction Monitoring)*. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Implementation of these mitigation measures would minimize impacts to special-status plants to the extent possible and would reduce impacts to less than significant (Class II). If SCE becomes a PSE in the MSHCP, additional measures to mitigate the proposed Project's impacts to rare plants, above and beyond those described below, may be required."	Mitigation for CRPR list 3 or 4 species is not typically required under CEQA because the species are not considered rare (California Rare Plant Rank 3: Plants About Which More Information is Needed - A Review List California Rare Plant Rank 4: Plants of Limited Distribution - A Watch List) and should only be considered if the project action would remove a great number of the population as to risk contributing to the species becoming rare. Permanent habitat disturbance related to the VSSP is not large enough that it would risk contributing to the decline of list 4 species known or with the potential to occur within the project area. List 1 species are considered under CEQA, and two species are known to occur, therefore SCE is recommending the paragraph be deleted and replaced with the paragraph below: "Two special status plant species, Parry's Spineflower (Chorizanthe parryi var. parryi) a CNPS List 1B.1 species and Long-Spined Spineflower (Chorizanthe polygonoides var. longispina) a CNPS List 1B.2 species, are not covered under the WRCMSHCP. In order to avoid potentially significant impacts to these species, Mitigation Measure BIO-18 (Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants and Implementation of Avoidance Measures) BIO-1 (Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices), BIO-5 (Implement Biological Construction Monitoring), have been identified to further reduce potential impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, and topsoil salvage will be performed for areas where these plants occur within impact areas. Soil salvage methodology and timeline will be determined by a qualified biologist and will be described in a Habitat Restoration and Monitoring Plan prior to ground disturbing activities. The plan shall be submitted for review and approval to CDFW within 15 days of the activity. If no comments are received within 15 days, SCE shall consider the plan approved, and conducting biological monitoring during ground disturbing and other construction related activities. Implementation of these mitigation measures would minimize impacts to listed plant species to the extent possible and reduce impacts to a less-than-significant level (Class II). **(see next page)**

D1-88

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)			~~To minimize impacts to rare plant species, Mitigation Measure BIO-24 *(Conduct Pre-construction Surveys for Special Status Plants and Implement Avoidance Measures)* and BIO-25 *(Compensate for Impacts to Special Status Plant Species)* would require pre-construction surveys, implementation of avoidance measures, and compensation for permanent and temporary impacts. The following measures would further reduce impacts: Mitigation Measures BIO-1 *(Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, and BIO-5 *(Implement Biological Construction Monitoring)*. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Implementation of these mitigation measures would minimize impacts to special status plants to the extent possible and would reduce impacts to less than significant (Class II).~~ ~~If SCE becomes a PSE in the MSHCP, additional measures to mitigate the proposed Project's impacts to rare plants, above and beyond those described below, may be required."~~

D1-88 cont.

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

C.5.4.2	C.5-92	**Mitigation Measures for Impact BIO-17:** **"BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** **BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.** **BIO-4 Develop a Habitat Restoration and Monitoring Plan.** **BIO-5 Implement Biological Construction Monitoring.** **BIO-17 Preparation of a Habitat Mitigation and Monitoring Plan.** **BIO-24 Conduct Pre-construction Surveys for Special-Status Plants and Implement Avoidance Measures.** Prior to initial ground disturbance and for undisturbed areas in subsequent construction years, SCE shall conduct pre-construction surveys for special-status plant species in all areas subject to ground-disturbing activity, including, but not limited to, tower/pole preparation and construction areas, assembly yards, and areas subject to grading for new access roads. The surveys shall be conducted during the appropriate blooming period(s) by a qualified plant ecologist/biologist, approved by the CPUC, according to protocols established by the USFWS, CDFW, and California Native Plant Society (CNPS). All listed plant species found shall be marked and avoided. Any populations of special-status plants found during surveys will be fully described, mapped, and a CNPS Field Survey Form or written equivalent shall be prepared. These surveys must be accomplished during a year in which rainfall totals are at least 80% of average and in which the temporal distribution of rainfall is not highly abnormal (e.g., with the vast majority of rainfall occurring very early or late in the season) to be reasonably certain of the presence/absence of rare plant species, unless surveys of reference populations document that precipitation conditions would not have adversely affected the detectability of the species. Prior to site grading, any populations of special-status plant species identified during the surveys shall be protected by a buffer zone. The buffer zone shall be established around these areas and shall be of sufficient size to eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. The size of the buffer depends upon the proposed use of the immediately adjacent lands, andincludes consideration of the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, physical and chemical characteristics of soils) that are identified by a qualified plant ecologist and/or botanist. The buffer for herbaceous and shrub species shall be, at minimum, 50 feet from the perimeter of the population or the individual. A smaller buffer may be established, provided there are adequate measures in place to avoid the take of the species, with the approval of the USFWS, CDFW, and CPUC. Highly visible flagging shall be placed along the buffer area and remain in good working order during the duration of any construction activities in the area. If project related impacts result in the loss of more than 10% of the on-site population of any special-status plant species, compensatory	In addition to the comment above, SCE proposes to remove BIO-24. BIO-24 is redundant to BIO-18 Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, and Candidate Plants and Implementation of Avoidance Measures. All special status flora will be detected during rare plant surveys. SCE also requests removal of BIO-25, because compensatory mitigation for these species is not required under current significance thresholds or relevant to the project: ***"Mitigation Measures for Impact BIO-17*** **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** ~~**BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.**~~ ~~**BIO-4 Develop a Habitat Restoration and Monitoring Plan.**~~ **BIO-5 Implement Biological Construction Monitoring.** **BIO-17 Preparation of a Habitat Mitigation and Monitoring Plan.** ~~**BIO-24 Conduct Pre-construction Surveys for Special-Status Plants and Implement Avoidance Measures.** Prior to initial ground disturbance and for undisturbed areas in subsequent construction years, SCE shall conduct pre-construction surveys for special-status plant species in all areas subject to ground-disturbing activity, including, but not limited to, tower/pole preparation and construction areas, assembly yards, and areas subject to grading for new access roads. The surveys shall be conducted during the appropriate blooming period(s) by a qualified plant ecologist/biologist, approved by the CPUC, according to protocols established by the USFWS, CDFW, and California Native Plant Society (CNPS). All listed plant species found shall be marked and avoided. Any populations of special-status plants found during surveys will be fully described, mapped, and a CNPS Field Survey Form or written equivalent shall be prepared.~~ ~~These surveys must be accomplished during a year in which rainfall totals are at least 80% of average and in which the temporal distribution of rainfall is not highly abnormal (e.g., with the vast majority of rainfall occurring very early or late in the season) to be reasonably certain of the presence/absence of rare plant species, unless surveys of reference populations document that precipitation conditions would not have adversely affected the detectability of the species.~~ ~~Prior to site grading, any populations of special-status plant species identified during the surveys shall be protected by a buffer zone. The buffer zone shall be established around these areas and shall be of sufficient size to eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including human trampling, erosion, and dust. The size of the buffer depends upon the proposed use of the immediately adjacent lands, andincludes consideration of the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, physical and chemical characteristics of soils) that are identified by a qualified plant ecologist and/or botanist. The buffer for herbaceous and shrub species shall be, at minimum, 50 feet from the perimeter of the population or the individual. A smaller buffer may be established, provided there are adequate measures in place to avoid the take of the species, with the approval of the USFWS, CDFW, and CPUC. Highly visible flagging shall be placed along the buffer area and remain in good working order during the duration of any construction activities in the area. If project related impacts result in the loss of more than 10% of the on-site population of any special-status plant species, compensatory mitigation will be required as described below.~~ **(see next page)**

D1-89

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2 (cont.)		BIO-25 Compensate for Impacts to Special-Status Plant Species. If VSSP related impacts result in the loss of more than 10% of the on-site population of any special-status plant species, compensatory mitigation will be required. Prior to the disturbance of habitat for or take of special-status plants/populations, SCE must receive CPUC approval of preserved and/or mitigation lands as well as present documentation of a recorded conservation easement(s). Compensation will be required for all impacts that exceed the 10% threshold (e.g. impacts to 15% of a population will only require compensation for 5% or the amount of impacts that exceed the 10% threshold). To compensate for permanent (including areas located beneath the arrays) impacts to special-status plant species, habitat (which may include preservation of areas within the undisturbed areas of the VSSP footprint, mitigation lands outside of VSSP site or a combination of both) that is not already public land shall be preserved and managed in perpetuity at a 1:1 mitigation ratio (one acre preserved for each acre impacted). Compensation for temporary impacts shall include land acquisition and/or preservation at a 0.5:1 ratio. The preserved habitat for a significantly impacted plant species shall be of equal or greater habitat quality to the impacted areas in terms of soil features, extent of disturbance, vegetation structure, and will contain verified extant populations, of the same size or greater, of the special status plants that are impacted. Impacts could include direct impacts resulting from loss of habitat or indirect impacts if a significant population or portion thereof is unable to be avoided. A conservation easement would need to be recorded on all property associated with the mitigation lands as to protect the existing plant resources in perpetuity. A conservation easement could be held by CDFW or an approved land management entity and shall be recorded immediately upon the dedication or acquisition of the land. Preserved or acquired mitigation lands will be monitored and maintained per the requirements set forth in the Habitat Mitigation and Monitoring Plan prepared for the project, discussed above (Mitigation Measure BIO-17). However, if lands acquired or protected for the compensation of permanent impacts species such as burrowing owl (Mitigation Measure BIO-25), and/or vegetative communities (Mitigation Measure BIO-3) contain similar sized populations of the impacted special-status plant species, of equal or greater habitat value, these mitigation lands may be used to achieve the required compensation ratios for special-status plant species. If SCE becomes a PSE with the MSHCP this compensation may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including verification of mitigation fee payments, shall be submitted to the CPUC prior to construction mobilization activities." ~~BIO-25 Compensate for Impacts to Special-Status Plant Species. If VSSP related impacts result in the loss of more than 10% of the on-site population of any special-status plant species, compensatory mitigation will be required. Prior to the disturbance of habitat for or take of special-status plants/populations, SCE must receive CPUC approval of preserved and/or mitigation lands as well as present documentation of a recorded conservation easement(s). Compensation will be required for all impacts that exceed the 10% threshold (e.g. impacts to 15% of a population will only require compensation for 5% or the amount of impacts that exceed the 10% threshold). To compensate for permanent (including areas located beneath the arrays) impacts to special-status plant species, habitat (which may include preservation of areas within the undisturbed areas of the VSSP footprint, mitigation lands outside of VSSP site or a combination of both) that is not already public land shall be preserved and managed in perpetuity at a 1:1 mitigation ratio (one acre preserved for each acre impacted). Compensation for temporary impacts shall include land acquisition and/or preservation at a 0.5:1 ratio. The preserved habitat for a significantly impacted plant species shall be of equal or greater habitat quality to the impacted areas in terms of soil features, extent of disturbance, vegetation structure, and will contain verified extant populations, of the same size or greater, of the special status plants that are impacted. Impacts could include direct impacts resulting from loss of habitat or indirect impacts if a significant population or portion thereof is unable to be avoided. A conservation easement would need to be recorded on all property associated with the mitigation lands as to protect the existing plant resources in perpetuity. A conservation easement could be held by CDFW or an approved land management entity and shall be recorded immediately upon the dedication or acquisition of the land. Preserved or acquired mitigation lands will be monitored and maintained per the requirements set forth in the Habitat Mitigation and Monitoring Plan prepared for the project, discussed above (Mitigation Measure BIO-17). However, if lands acquired or protected for the compensation of permanent impacts species such as burrowing owl (Mitigation Measure BIO-25), and/or vegetative communities (Mitigation Measure BIO-3) contain similar sized populations of the impacted special-status plant species, of equal or greater habitat value, these mitigation lands may be used to achieve the required compensation ratios for special-status plant species. If SCE becomes a PSE with the MSHCP this compensation may be accomplished through participation and implementation of the MSHCP requirements. Documentation of participation and compliance with the MSHCP, including verification of mitigation fee payments, shall be submitted to the CPUC prior to construction mobilization activities."~~

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-94	Third full paragraph: "Impacts to burrowing owl would be significant without mitigation. To minimize impacts to burrowing owl, Mitigation Measure BIO-26 (*Complete Focused Pre-construction Burrowing Owl Surveys and Implement Avoidance Measures)* requires pre-construction surveys and implementation of buffers around occupied nest locations. In addition, Mitigation Measures BIO-1 (*Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, and BIO-5 *(Implement Biological Construction Monitoring)* would further reduce impacts. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Mitigation Measure BIO-3 requires compensation for impacts to annual grassland habitat, which is known to support species such as burrowing owl; therefore no additional compensation for impacts to burrowing owl habitat is needed. Mitigation Measure NOI-2 *(Implement Best Management Practices for Construction Noise)* would require the use of noise-suppression techniques, to the extent feasible, during construction. Mitigation Measure BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* includes a noise monitoring component. Implementation of these mitigation measures would minimize impacts to burrowing owl to the extent possible and reduce impacts to a less-than-significant level (Class II). If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to burrowing owl, above and beyond those described below, may be required."	Because burrowing owl habitat occurs throughout the proposed Project, and burrowing owls have been observed during previous surveys, it is likely that burrowing owl could occur within the proposed Project area. Therefore, potential impacts to burrowing owl will be addressed through implementation of a Determination of Biologically Equivalent or Superior Preservation (DBESP) (EI 2015d), which includes measures that will locate any owls prior to construction and if burrowing owls are present, measures will be implemented to prevent impacts to burrowing owls during the breeding season and minimize/mitigate impacts to owls outside the breeding season. SCE has committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP, measures which include, but are not limited to, preconstruction surveys; construction monitoring; and implementation of MSHCP BMP measures will ensure impacts to burrowing owls are mitigated. Therefore SCE is recommending the following revisions: "Impacts to burrowing owl would be significant without mitigation. To minimize impacts to burrowing owl, Mitigation Measure ~~BIO-26 (*Complete Focused Pre-construction Burrowing Owl Surveys and Implement Avoidance Measures)* requires pre-construction surveys and implementation of buffers around occupied nest locations. In addition, Mitigation Measures~~ BIO-1 (*Implement a Worker Environmental* Awareness~~*Education*~~ *Program)*, BIO-2 *(Implement Best Management Practices)*, ~~BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, and~~ BIO-5 *(Implement Biological Construction Monitoring)* would further reduce impacts. ~~These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Mitigation Measure BIO-3 requires compensation for impacts to annual grassland habitat, which is known to support species such as burrowing owl; therefore no additional compensation for impacts to burrowing owl habitat is needed.~~ Mitigation Measure NOI-2 *(Implement Best Management Practices for Construction Noise)* would require the use of noise-suppression techniques, to the extent feasible, during construction. Mitigation Measure BIO-7 *(Prepare and Implement a Nesting Bird Management Plan)* includes a noise monitoring component. Implementation of these mitigation measures as well as participation in the MSHCP would minimize impacts to burrowing owl to the extent possible and reduce impacts to a less-than-significant level (Class II). ~~If SCE becomes a PSE in the MSHCP additional measures to mitigate the proposed Project's impacts to burrowing owl, above and beyond those described below, may be required.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-95	*"Mitigation Measures for Impact BIO-18* **NOI-2 Implement Best Management Practices for Construction Noise.** (Section C.12 Noise) **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** **BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.** **BIO-4 Develop a Habitat Restoration and Monitoring Plan.** **BIO-5 Implement Biological Construction Monitoring.** **BIO-26 Complete Focused Pre-construction Burrowing Owl Surveys and Implement Avoidance Measures.** No more than 15 days prior to the commencement of initial ground disturbing for individual VSSP areas, SCE shall implement focused pre-construction reconnaissance level surveys for burrowing owls. Surveys shall be conducted prior to the initiation of ground disturbance and be conducted by a qualified biologist(s), approved by the CPUC, that is knowledgeable with the species. In conformance with federal and State regulations regarding the protection of raptors, surveys for burrowing owls shall be conducted in conformance with CDFW's 2012 Staff Report on burrowing owl mitigation. Surveys shall be completed within all areas proposed for ground disturbance (including a minimum 250-foot survey buffer) and shall include the following avoidance measures: a. Occupied burrows shall not be disturbed during the nesting season (1 February through 31 August) unless a qualified biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg-laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival. Owls present on site after 1 February will be assumed to be nesting unless evidence indicates otherwise. This protected buffer area will remain in effect until 31 August, or based upon monitoring evidence, until the young owls are foraging independently or the nest is no longer active b. Unless otherwise authorized by CDFW and the CPUC, a 250-foot buffer, within which no activity will be permissible, will be maintained between VSSP activities and nesting burrowing owls during the nesting season. This protected area will remain in effect until 31 August or based upon monitoring evidence, until the young owls are foraging independently. For burrowing owls present during the non-breeding season (generally 1 September to 31 January), a 150-ft buffer zone will be maintained around the occupied burrow(s).	SCE has committed to becoming a PSE with the WRMSHCP. Through participation in the MSHCP, measures which include, but are not limited to, preconstruction surveys; construction monitoring; and implementation of MSHCP BMP measures will ensure impacts to burrowing owls are mitigated. Therefore, SCE is recommending the following revisions: *"Mitigation Measures for Impact BIO-18* **NOI-2 Implement Best Management Practices for Construction Noise.** (Section C.12 Noise) **BIO-1 Implement a Worker Environmental Education Program.** **BIO-2 Implement Best Management Practices (BMPs).** ~~**BIO-3 Compensation for Permanent Impacts to Sensitive Vegetation Communities.**~~ ~~**BIO-4 Develop a Habitat Restoration and Monitoring Plan.**~~ **BIO-5 Implement Biological Construction Monitoring.** ~~**BIO-26 Complete Focused Pre-construction Burrowing Owl Surveys and Implement Avoidance Measures.** No more than 15 days prior to the commencement of initial ground disturbing for individual VSSP areas, SCE shall implement focused pre-construction reconnaissance level surveys for burrowing owls. Surveys shall be conducted prior to the initiation of ground disturbance and be conducted by a qualified biologist(s), approved by the CPUC, that is knowledgeable with the species. In conformance with federal and State regulations regarding the protection of raptors, surveys for burrowing owls shall be conducted in conformance with CDFW's 2012 Staff Report on burrowing owl mitigation. Surveys shall be completed within all areas proposed for ground disturbance (including a minimum 250-foot survey buffer) and shall include the following avoidance measures: a. Occupied burrows shall not be disturbed during the nesting season (1 February through 31 August) unless a qualified biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg-laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent survival. Owls present on site after 1 February will be assumed to be nesting unless evidence indicates otherwise. This protected buffer area will remain in effect until 31 August, or based upon monitoring evidence, until the young owls are foraging independently or the nest is no longer active b. Unless otherwise authorized by CDFW and the CPUC, a 250-foot buffer, within which no activity will be permissible, will be maintained between VSSP activities and nesting burrowing owls during the nesting season. This protected area will remain in effect until 31 August or based upon monitoring evidence, until the young owls are foraging independently. For burrowing owls present during the non-breeding season (generally 1 September to 31 January), a 150-ft buffer zone will be maintained around the occupied burrow(s).~~ **(see next page)**

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

<table>
<tr><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommendations</th></tr>
<tr><td>C.5.4.2 (cont.)</td><td></td><td>c. If there is any danger that owls will be injured or killed as a result of construction activity, during the non-breeding season, the birds may be passively relocated. Relocation of owls during the non-breeding season will be performed by a qualified biologist using one-way doors, which should be installed in all burrows within the impact area and left in place for at least two nights. These one-way doors will then be removed and the burrows backfilled immediately prior to the initiation of grading. To avoid the potential for owls evicted from a burrow to occupy other burrows within the impact area, one-way doors will be placed in all potentially suitable burrows within the impact area when eviction occurs. d. Any damaged or collapsed burrows will be replaced with artificial burrows in adjacent habitat at a 2:1 ratio."</td><td>~~c. If there is any danger that owls will be injured or killed as a result of construction activity, during the non-breeding season, the birds may be passively relocated. Relocation of owls during the non-breeding season will be performed by a qualified biologist using one-way doors, which should be installed in all burrows within the impact area and left in place for at least two nights. These one-way doors will then be removed and the burrows backfilled immediately prior to the initiation of grading. To avoid the potential for owls evicted from a burrow to occupy other burrows within the impact area, one-way doors will be placed in all potentially suitable burrows within the impact area when eviction occurs.~~

~~d. Any damaged or collapsed burrows will be replaced with artificial burrows in adjacent habitat at a 2:1 ratio."~~</td></tr>
<tr><td>C.5.4.2</td><td>C.5-96</td><td>Table C.5-10:
Table C.5-10. Acreage of Jurisdictional Waters and Wetlands Within Proposed Project Impact Areas<table><tr><th colspan="2" rowspan="2">Jurisdictional Feature Type</th><th colspan="2">Approximate Acres*</th></tr><tr><th>Permanent</th><th>Temporary</th></tr><tr><td rowspan="2">Corps/RWQCB * Waters and Wetlands</td><td>Non-wetland Waters of the U.S.</td><td>0.00</td><td>0.31</td></tr><tr><td>Wetlands</td><td>0.01</td><td>1.48</td></tr><tr><td>RWQCB* Waters</td><td>Non-wetland Waters</td><td>0.00</td><td>0.39</td></tr><tr><td colspan="2">CDFW Jurisdictional Waters</td><td>0.01</td><td>2.43</td></tr></table>* The VSSP occurs in jurisdictional areas for both the San Diego and Santa Ana Regional Water Quality Control Boards.</td><td>The project is not proposing to impact any jurisdictional Corp/RWQCB Non-wetlands and wetlands Waters of the U.S., "RWQCB Non-wetland Waters" or "CDFW Jurisdictional Waters". Therefore, Table C.5-10 should be removed:
<s>Table C.5-10. Acreage of Jurisdictional Waters and Wetlands Within Proposed Project Impact Areas</s><table><tr><th colspan="2" rowspan="2">Jurisdictional Feature Type</th><th colspan="2">Approximate Acres*</th></tr><tr><th>Permanent</th><th>Temporary</th></tr><tr><td rowspan="2">Corps/RWQCB * Waters and Wetlands</td><td>Non-wetland Waters of the U.S.</td><td>0.00</td><td>0.31</td></tr><tr><td>Wetlands</td><td>0.01</td><td>1.48</td></tr><tr><td>RWQCB* Waters</td><td>Non-wetland Waters</td><td>0.00</td><td>0.39</td></tr><tr><td colspan="2">CDFW Jurisdictional Waters</td><td>0.01</td><td>2.43</td></tr></table>* The VSSP occurs in jurisdictional areas for both the San Diego and Santa Ana Regional Water Quality Control Boards.</td></tr>
</table>

D1-91 cont.

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.5.4.2	C.5-96	First paragraph: "An assessment of jurisdictional wetlands, other "waters of the U.S.," waters of the State, and riparian habitat has been conducted for the VSSP site; the assessment identified approximately 4.64 acres of jurisdictional features within proposed Project impact areas (see Figures C.5- 2a-g, located at the end of this section). Table C.5-10 lists the feature type and approximate impact acreages resulting from construction and operation of the VSSP. Based on the tentative design information provided by SCE, construction of the VSSP components would result in the permanent loss of 0.01 acres of federally jurisdictional wetlands and CDFW jurisdictional waters. The VSSP would also temporarily impact federal wetlands and non-wetlands waters, RWQCB non-wetland waters, and CDFW jurisdictional waters (refer to Table C.5-10 for impact acreages). SCE has committed to avoiding impacts to jurisdictional features for the entire VSSP; should this not be feasible during construction impacts to jurisdictional features would occur as described below."	The project is not impacting any jurisdictional waters or riparian habitat. Therefore, SCE is recommending the following changes: "An assessment of jurisdictional wetlands, other "waters of the U.S.," waters of the State, and riparian habitat has been conducted for the VSSP site~~; the assessment identified approximately 4.64 acres of jurisdictional features within proposed Project impact areas~~ (see Figures C.5-2a-g, located at the end of this section). ~~Table C.5-10 lists the feature type and approximate impact acreages resulting from construction and operation of the VSSP. Based on the tentative design information provided by SCE, construction of the VSSP components would result in the permanent loss of 0.01 acres of federally jurisdictional wetlands and CDFW jurisdictional waters. The VSSP would also temporarily impact federal wetlands and non-wetlands waters, RWQCB non-wetland waters, and CDFW jurisdictional waters (refer to Table C.5-10 for impact acreages).~~ SCE has committed to avoiding impacts to jurisdictional features for the entire VSSP; however should this not be feasible during construction SCE shall, as required by law, be required to obtain permit authorization pursuant to Section 401 and 404 of the CWA, the State Porter-Cologne Act, and Fish and Game Code Section 1602, prior to the start work within those jurisdictional areas. ~~impacts to jurisdictional features would occur as described below.~~"

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

C.5.4.2	C.5-96	Beginning at second paragraph: "Direct impacts to State and federal waters would include the removal of native riparian vegetation, the discharge of fill, degradation of water quality, and increased erosion and sediment transport. Indirect impacts could include alterations to the existing topographical and hydrological conditions and the introduction of non- native, invasive plant species. Operational impacts to wetland habitats would be similar to direct and indirect impacts. As required by law, SCE would comply with the regulations regarding conducting VSSP activities in water courses and habitats under the jurisdiction of the State and federal government. Therefore, SCE would obtain required permits pursuant to Section 401 and 404 of the CWA, the State Porter-Cologne Act, and Fish and Game Code Section 1605. Due to the importance of riparian habitats and ephemeral/perennial drainages and their suitability to support special-status species, any loss of the habitats described above associated with the VSSP would be considered a significant adverse impact without mitigation. To minimize impacts to jurisdictional wetland and waters features, Mitigation Measures BIO-1 (*Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, BIO-3 *(Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*, BIO-5 *(Implement Biological Construction Monitoring)*, and BIO-13 *(Avoid Seasonal Depressions and Known Waterbodies)* have been identified. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, development of a Habitat Restoration and Monitoring Plan, conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Implementation of these mitigation measures would minimize impacts to jurisdictional wetland and waters features to the extent possible and reduce impacts to a less-than-significant level (Class II)."	The Project is avoiding all jurisdictional Waters of the U.S, Waters of the State (both wetlands non-wetlands), and riparian habitat. Therefore, SCE is recommending the following change: "Direct impacts to State and federal waters would include the removal of native riparian vegetation, the discharge of fill, degradation of water quality, and increased erosion and sediment transport. Indirect impacts could include alterations to the existing topographical and hydrological conditions and the introduction of non- native, invasive plant species. Operational impacts to wetland habitats would be similar to direct and indirect impacts. ~~As required by law, SCE would comply with the regulations regarding conducting VSSP activities in water courses and habitats under the jurisdiction of the State and federal government. Therefore, SCE would obtain required permits pursuant to Section 401 and 404 of the CWA, the State Porter-Cologne Act, and Fish and Game Code Section 1605.~~ Due to the importance of riparian habitats and ephemeral/perennial drainages and their suitability to support special-status species, any loss of the habitats described above associated with the VSSP would be considered a significant adverse impact without mitigation. To ~~minimize~~ avoid impacts to jurisdictional wetland and waters features, Mitigation Measures BIO-1 (*Implement a Worker Environmental Education Program)*, BIO-2 *(Implement Best Management Practices)*, ~~*BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities)*, BIO-4 *(Develop a Habitat Restoration and Monitoring Plan)*,~~ and BIO-5 *(Implement Biological Construction Monitoring)*, ~~and BIO-13 *(Avoid Seasonal Depressions and Known Waterbodies)*~~ have been identified. These measures include worker education describing the sensitive biological resources that occur on the VSSP site, implementation of BMPs to minimize and avoid impacts (including speed limits to control fugitive dust), conducting pre-construction surveys, ~~development of a Habitat Restoration and Monitoring Plan,~~ conducting biological monitoring during ground disturbing and other construction related activities, and clearance surveys prior the start of construction activities. Implementation of these mitigation measures would avoid ~~minimize~~ impacts to jurisdictional wetland and waters features ~~to the extent possible~~ and reduce impacts to a less-than-significant level (Class II)."

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.3	C.5-101	***"Criterion BIO4: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.*** Construction and operation of the VSSP would result in approximately 0.01 acres of permanent and 4.61 acre of temporary impacts to jurisdictional wetlands and/or waters. The removal of native riparian vegetation and alterations to existing topographical and hydrological conditions associated with the VSSP and other reasonably foreseeable projects would directly impact jurisdictional wetlands and/or waters (refer to **Impact BIO-19**). Ephemeral and intermittent streams in the arid west provide important habitat for wildlife and are responsible for much of the biotic diversity (Levick et al., 2008). Construction and operation of the VSSP would combine with the impacts from reasonably foreseeable projects in the defined geographical extent to result in a significant cumulative impact related to jurisdictional wetlands and/or waters. Implementation of Mitigation Measures BIO-1 through BIO-5 and BIO-13 require compensation for permanent impacts to riparian habitat and sensitive communities, development of a plan for the restoration of all temporarily impacted habitats, monitoring during construction, and avoidance of seasonal depressions and known waterbodies. With the implementation of these mitigation measures, the cumulative contribution of the VSSP to jurisdictional wetlands and/or waters would be less than significant (Class II)."	The project is avoiding all jurisdictional Waters of the U.S, Waters of the State (both wetlands non-wetlands), and riparian habitat. Therefore the project will not contribute cumulative impacts to jurisdictional waters in the region. SCE is recommending the following change: ***"Criterion BIO4: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.*** Construction and operation of the VSSP would avoid all impacts, both permanent and temporary ~~result in approximately 0.01 acres of permanent and 4.61 acre of temporary impacts~~ to jurisdictional wetlands and/or waters. The removal of native riparian vegetation and alterations to existing topographical and hydrological conditions associated with the VSSP and other reasonably foreseeable projects have the potential to ~~would~~ directly impact jurisdictional wetlands and/or waters (refer to **Impact BIO-19**) if these features are not avoided. Ephemeral and intermittent streams in the arid west provide important habitat for wildlife and are responsible for much of the biotic diversity (Levick et al., 2008). Construction and operation of the VSSP would not combine with the impacts from reasonably foreseeable projects in the defined geographical extent to result in a significant cumulative impact related to jurisdictional wetlands and/or waters. Implementation of Mitigation Measures BIO-1, BIO-2, and ~~through~~ BIO-5 ~~and BIO-13~~ require ~~compensation for permanent impacts to riparian habitat and sensitive communities, development of a plan for the restoration of all temporarily impacted habitats,~~ monitoring during construction, and the implementation of Best Management Practices to ensure full avoidance of all jurisdictional waters, wetlands, and riparian habitats ~~seasonal depressions and known waterbodies~~. With the implementation of these mitigation measures, the cumulative contribution of the VSSP to jurisdictional wetlands and/or waters would be less than significant (Class II)."	D1-95
C.5.4.4	C.5-108	Figure C.5-1b Map B Vegetation and Cover Types.	SCE will be avoiding the Southern Willow Scrub habitat shown within the impact corridor on Figure C5-1b Map B. This was updated in November 2015 and is included in the WRCMSHCP Biotechnical report as an area of avoidance. Thus, impacts to this vegetation community will be zero and can be removed from impact calculations. Therefore, please revise Figure C5-1b Map B to display there is no impact to Southern Willow Scrub.	D1-96

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.4	C.5-111	Figure C.5-2a Map A Jurisdictional Features.	Additional areas identified as riparian habitat are included within the DEIR that were not mapped as part of SCE's jurisdictional delineation data or included within SCE's PEA submitted to the CPUC. SCE does not necessarily concur with the CPUC's determination that these areas should be classified as jurisdictional riparian habitat and notes that the final determination of jurisdiction can only be made by the applicable resource agencies (i.e., USACE, CDFW, and RWQCB). Current maps in the DEIR identifies impacts to some or all of these CPUC-mapped riparian habitat areas. However, SCE has reviewed these areas and determined that they will be fully avoided by all construction activities and no impacts are expected. Please see attached JD Discrepancy Summary Table and PDF Figures of the five discrepancy locations in question (Figures – Aspen JD 1-5). Therefore, SCE recommends revising Figures C.5-2a, 2b, 2d, and 2e to show there will be no impacts to the CPUC-mapped riparian habitat areas.	D1-97
C.5.4.4	C.5-112	Figure C.5-2b Map B Jurisdictional Features.	Additional areas identified as riparian habitat are included within the DEIR that were not mapped as part of SCE's jurisdictional delineation data or included within SCE's PEA submitted to the CPUC. SCE does not necessarily concur with the CPUC's determination that these areas should be classified as jurisdictional riparian habitat and notes that the final determination of jurisdiction can only be made by the applicable resource agencies (i.e., USACE, CDFW, and RWQCB). Current maps in the DEIR identifies impacts to some or all of these CPUC-mapped riparian habitat areas. However, SCE has reviewed these areas and determined that they will be fully avoided by all construction activities and no impacts are expected. Please see attached JD Discrepancy Summary Table and PDF Figures of the five discrepancy locations in question (Figures – Aspen JD 1-5). Therefore, SCE recommends revising Figures C.5-2a, 2b, 2d, and 2e to show there will be no impacts to the CPUC-mapped riparian habitat areas.	D1-98

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

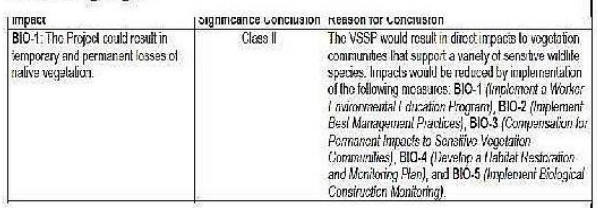
SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5.4.4	C.5-114	Figure C.5-2d Map D Jurisdictional Features.	Additional areas identified as riparian habitat are included within the DEIR that were not mapped as part of SCE's jurisdictional delineation data or included within SCE's PEA submitted to the CPUC. SCE does not necessarily concur with the CPUC's determination that these areas should be classified as jurisdictional riparian habitat and notes that the final determination of jurisdiction can only be made by the applicable resource agencies (i.e., USACE, CDFW, and RWQCB). Current maps in the DEIR identifies impacts to some or all of these CPUC-mapped riparian habitat areas. However, SCE has reviewed these areas and determined that they will be fully avoided by all construction activities and no impacts are expected. Please see attached JD Discrepancy Summary Table and PDF Figures of the five discrepancy locations in question (Figures – Aspen JD 1-5). Therefore, SCE recommends revising Figures C.5-2a, 2b, 2d, and 2e to show there will be no impacts to the CPUC-mapped riparian habitat areas.	D1-99
C.5.4.4	C.5-115	Figure C.5-2e Map E Jurisdictional Features.	Additional areas identified as riparian habitat are included within the DEIR that were not mapped as part of SCE's jurisdictional delineation data or included within SCE's PEA submitted to the CPUC. SCE does not necessarily concur with the CPUC's determination that these areas should be classified as jurisdictional riparian habitat and notes that the final determination of jurisdiction can only be made by the applicable resource agencies (i.e., USACE, CDFW, and RWQCB). Current maps in the DEIR identifies impacts to some or all of these CPUC-mapped riparian habitat areas. However, SCE has reviewed these areas and determined that they will be fully avoided by all construction activities and no impacts are expected. Please see attached JD Discrepancy Summary Table and PDF Figures of the five discrepancy locations in question (Figures – Aspen JD 1-5). Therefore, SCE recommends revising Figures C.5-2a, 2b, 2d, and 2e to show there will be no impacts to the CPUC-mapped riparian habitat areas.	D1-100

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.5	C.5-53, 54, 55, 61, 65, 67, 69, 71, 72, 73, 75, 79, 81, 82, 83, 85, 86, 87, 88, 90, 92, 94, 96, 97 and 103	Global language:  Impact / Significance Conclusion / Reason for Conclusion BIO-1: The Project could result in temporary and permanent losses of native vegetation. / Class II / The VSSP would result in direct impacts to vegetation communities that support a variety of sensitive wildlife species. Impacts would be reduced by implementation of the following measures: BIO-1 (Implement a Worker Environmental Education Program), BIO-2 (Implement Best Management Practices), BIO-3 (Compensation for Permanent Impacts to Sensitive Vegetation Communities), BIO-4 (Develop a Habitat Restoration and Monitoring Plan), and BIO-5 (Implement Biological Construction Monitoring).	Please revise WEAP accordingly in the pages identified and globally throughout the document: "BIO-1 (Implement a Worker Environmental ~~Education~~ Awareness Program),…."	D1-101
C.6.4.2	C.6-31	Third paragraph: "As shown in Table C.6-6, there are 15 CRHR-eligible cultural resources within the Project area."	Table C.6-6 identifies 17 CRHR-eligible cultural resources. To be consistent, please revise as follows: "As shown in Table C.6-6, there are ~~15~~ 17 CRHR-eligible cultural resources within the Project area."	D1-102
C.6.4.2	C.6-35	Top of the page: "…therefore, the total acreage for the Project area would be assessed for impacts. Altogether, the proposed Project consists of approximately 15.2 linear miles and 458 acres."	This Section indicates the proposed project consists of 15.2 linear miles and 458 acres. The total acreage for the proposed ground disturbance is currently 194 acres. The original 458 acres that was determined for survey purposes during the initial Ground Disturbance Area Data (GDAD) exercise has since been reduced. "…therefore, the total acreage for the Project area would be assessed for impacts. Altogether, the proposed Project consists of approximately 15.2 linear miles and ~~458~~ 194 acres."	D1-103
C.7.4.2	C.7-20	Fifth paragraph: "Current regulations would require that the proposed Project obtain under the CWA regulations a NPDES General Permit for Storm Water Discharges Associated with Construction Activity as construction would disturb a surface area greater than one acre"	For clarity, SCE recommends the following edits: "~~Current regulations would require that the proposed Project~~ As required by ~~obtain under~~ the CWA, the proposed Project will be governed by ~~regulations~~ a NPDES General Permit for Storm Water Discharges Associated with Construction Activity~~ies as the disturbance area will be construction would disturb a surface area~~ greater than one acre"	D1-104

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.7.4.2	C.7-21	Mitigation Measure GEO-1 states: "**GEO-1 Investigations for Liquefaction.** Because seismically induced liquefaction-related ground failure has the potential to damage or destroy Project components, the design-level geotechnical investigations to be performed by Southern California Edison shall include investigations designed to assess the potential for liquefaction to affect new Project structures with foundations (such as Tubular Steel Poles) in areas with potential liquefaction-related impacts. Where these hazards are found to exist, appropriate engineering design and construction measures shall be incorporated into the Project designs as deemed appropriate by the Project engineer. Design measures that would mitigate liquefaction-related impacts could include ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in cables to allow ground deformations without damage to structures. Study results and proposed solutions to mitigate liquefaction shall be provided to the California Public Utilities Commission for review and approval at least 60 days before final Project design."	The DEIR at page C.7-21 under Impact GEO-4 finds that portions of the proposed Project have moderate to very high liquefaction susceptibility and there is a potential that these sediments may be subject to liquefaction in the event of strong ground shaking. Therefore to clarify that Mitigation Measure GEO-1 is applicable to those portions of the proposed Project with moderate to very high liquefaction susceptibility, it is recommended that the Mitigation Measure be revised as provided below: "**GEO-1 Investigations for Liquefaction.** Because seismically induced liquefaction-related ground failure has the potential to damage or destroy Project components, the design-level geotechnical investigations to be performed by Southern California Edison shall include investigations designed to assess the potential for liquefaction to affect new Project structures with foundations (such as Tubular Steel Poles) in areas with moderate to very high potential liquefaction-related impacts. Where these hazards are found to exist, appropriate engineering design and construction measures shall be incorporated into the Project designs as deemed appropriate by the Project engineer. Design measures that would mitigate liquefaction-related impacts could include ground improvement of liquefiable zones, installation of flexible bus connections, and incorporation of slack in cables to allow ground deformations without damage to structures. Study results and proposed solutions to mitigate liquefaction shall be provided to the California Public Utilities Commission for review and approval at least 60 days before final Project design."

D1-105

Comment Set D1 – Southern California Edison (cont.)

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SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.7.4.2	C.7-22	"**GEO-2 Assess Soil Characteristics.** The design-level geotechnical studies to be performed for the proposed Project shall include soils analyses to identify the presence, if any, of potentially detrimental soil chemicals, such as chlorides and sulfates, detrimental soil pH at Tubular Steel Pole (TSP) and Light Weight Steel Pole locations and testing for soils with moderate to high shrink/swell or expansion potential at TSP locations. If corrosive soils are identified, appropriate design measures for protection of reinforcement, concrete, and metal structural components against corrosion shall be utilized, such as use of corrosion-resistant materials and coatings, increased thickness of Project components exposed to potentially corrosive conditions, and use of passive and/or active cathodic protection systems. If expansive soils are identified, the Project design shall be modified to include appropriate design features such as excavation of potentially expansive soils during construction and replacement with engineered backfill, ground-treatment processes, and redirection of surface water and drainage away from expansive foundation soils. Study results and proposed solutions to mitigate expansive or corrosive soils conditions shall be provided to the California Public Utilities Commission for review and approval at least 60 days before final Project design."	For clarity, passive or active cathodic protection systems are typically used for pipelines, therefore SCE recommends removing as follows: "**GEO-2 Assess Soil Characteristics.** The design-level geotechnical studies to be performed for the proposed Project shall include soils analyses to identify the presence, if any, of potentially detrimental soil chemicals, such as chlorides and sulfates, detrimental soil pH at Tubular Steel Pole (TSP) and Light Weight Steel Pole locations and testing for soils with moderate to high shrink/swell or expansion potential at TSP locations. If corrosive soils are identified, appropriate design measures for protection of reinforcement, concrete, and metal structural components against corrosion shall be utilized, such as use of corrosion-resistant materials and coatings, and increased thickness of Project components exposed to potentially corrosive conditions~~, and use of passive and/or active cathodic protection systems~~. If expansive soils are identified, the Project design shall be modified to include appropriate design features such as excavation of potentially expansive soils during construction and replacement with engineered backfill, ground-treatment processes, and redirection of surface water and drainage away from expansive foundation soils. Study results and proposed solutions to mitigate expansive or corrosive soils conditions shall be provided to the California Public Utilities Commission for review and approval at least 60 days before final Project design."	D1-106
C.7.4.3	C.7-23	Third paragraph: "Potential erosion related to excavation and grading for the Proposed Project would be limited to areas of ground disturbance for this Project that are underlain by soils with moderate to high erosion potential and compliance with the project NPDES and SWPPP reduces the potential to trigger or accelerated erosion (Impact GEO-1) to less than significant (Class III)."	The sentence structure is unclear. For example, not all of the areas of ground disturbance will be in areas of moderate to high erosion potential. Please revise as follows: "~~Potential erosion related to excavation and grading~~ ~~F~~For the Proposed Project, potential erosion would be limited to areas of ground disturbance involving excavation and grading. ~~for this Project that are underlain by soils with moderate to high erosion potential and~~ NDPES compliance ~~with the project NPDES~~ and SWPPP implementation will reduce~~s~~ the potential to trigger or accelerate~~d~~ erosion (Impact GEO-1) to less than significant (Class III)."	D1-107

Comment Set D1 – Southern California Edison (cont.)

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SCE COMMENTS

<table>
<tr><th>Section</th><th>Page</th><th>DEIR Language</th><th>SCE Recommendations</th></tr>
<tr><td>C.7.4.4</td><td>C.7-24</td><td>Table C.7.4:
Table C.7-4. Impact and Mitigation Summary – Geology and Soils
<table>
<tr><th>Impact</th><th>Significance Conclusion</th><th>Reason for Conclusion</th></tr>
<tr><td>GEO-1: Project construction could trigger soil erosion.</td><td>Class III</td><td>Compliance with NPDES and SWPPP would reduce potential for Project related ground disturbance to trigger or accelerate soil erosion.</td></tr>
<tr><td>GEO-2: Project could expose people or structures to potential risk of loss or injury where there is high potential for earthquake-related ground rupture in the vicinity of major fault crossings.</td><td>Class III</td><td>No faults cross Segment 1 of the proposed Project. A potentially active fault crosses Segment 2, however only reconductoring would be completed on this segment. The reconductoring is not expected to alter existing conditions or add substantial instability to existing overhead structures.</td></tr>
<tr><td>GEO-3: Project structures could be damaged by seismically-induced ground shaking.</td><td>Class III</td><td>Project design would comply with CPUC GO 95 and GO 128, reducing and/or eliminating the risk of poles or towers failing due to ground shaking.</td></tr>
<tr><td>GEO-4: Project structures could be damaged by seismically-induced ground failures.</td><td>Class II</td><td>Implementation of Mitigation Measure GEO-1 (Investigations for Liquefaction) and compliance with CPUC GO 95 and GO 128 during Project design would reduce the potential for damage to Project components with foundations from liquefaction.</td></tr>
<tr><td>GEO-5: Project structures could be damaged by unsuitable soils</td><td>Class II</td><td>Implementation of Mitigation Measure GEO-2 (Assess Soil Characteristics) prior to final Project design would allow for identification of unsuitable soils and design of appropriate counter measures to prevent damage to buried concrete and steel components at TSP and LSW pole locations.</td></tr>
</table></td><td>Please revise the following table as follows; two different significance classifications need to be included for Segments 1 and 2. They are Class II and III respectively.
Geo-4, Significane Conclusion for Segment 1 is Class II and for Segment 2 is Class III.
<table>
<tr><td>GEO-4: Project structures could be damaged by seismically-induced ground failures.</td><td>Class II <u>(Segment 1)</u> <u>& Class III</u> <u>(Segment 2)</u></td><td>Implementation of Mitigation Measure GEO-1 (Investigations for Liquefaction) and compliance with CPUC GO 95 and GO 128 during Project design would reduce the potential for damage to Project components with foundations from liquefaction.</td></tr>
</table></td></tr>
<tr><td>B-1 and C.9.1.3</td><td>B-38, B-39, B-61, B-62 and C.9-3, C-9-12, C.9-13, C.9-14</td><td>Draft EIR uses the title “Spill Response Coordinator” for the person who will be contacted when soil contamination is encountered.</td><td>Since SCE prepared and filed the PEA in 2014, some of the SCE personnel titles have been revised. “Spill Response Coordinator” has been changed to “Safety Environmental Specialist (SES)” who is mostly responsible for spill response reporting and clean up. Therefore, SCE suggests revising the DEIR replacing “Spill Environmental Coordinator” with “Safety Environmental Specialist” throughout the document. In addition, this revision will be in accordance with trainings, such as WEAP and with future SCE documents.
Suggest to change to:
“Safety & Environmental Specialist”</td></tr>
<tr><td>C.9.2.1</td><td>C.9-6</td><td>First paragraph, second sentence:
“A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, or the total above ground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons, and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the “Navigable Waters” of the United States.”</td><td>The latest update of SPCC regulation (40 CFR 112) requires facilities that have aboveground oil storage capacity of more than 1,320 gallons or completely buried storage capacity of more than 42,000 gallons to have/maintain SPCC Plans. There is no requirement for maintaining a SPCC Plan for a facility with a single oil storage tank of 660 gallons or greater. Therefore, SCE requests the following:
“A facility is subject to SPCC regulations if ~~a single oil storage tank has a capacity greater than 660 gallons, or~~ the total above ground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons, and if, due to its location, the facility could reasonably be expected to discharge oil into or upon the “Navigable Waters” of the United States.”</td></tr>
</table>

D1-108

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Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.9.4.2	C.9-13	Third paragraph: "Small portions of the proposed Project, where ground disturbance would be required, trenching of the underground portion of the new 115-kV subtransmission line at and near Valley Substation, and excavation for poles in the vicinity of the intersection of Segments 1 and 2, would be located in light industrial areas with facilities that use and store large quantities of hazardous materials, as listed in Section C.9.1.4 (Environmental Contamination)."	Section C.9.1.4 is for Airports and Private Airstrips/Helipad, Section C.9.1.3 is for Environmental Contamination, therefore the reference should be revised to the correct section as follows: "Small portions of the proposed Project, where ground disturbance would be required, trenching of the underground portion of the new 115-kV subtransmission line at and near Valley Substation, and excavation for poles in the vicinity of the intersection of Segments 1 and 2, would be located in light industrial areas with facilities that use and store large quantities of hazardous materials, as listed in Section C.9.1.43 (Environmental Contamination)."

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Comment Set D1 – Southern California Edison (cont.)

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SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.9.4.2	C.9-14	**Mitigation Measures for Impact HAZ-2:** **"HAZ-1 Identify Pesticide/Herbicide Contamination.** Prior to Project construction, soil samples shall be collected in construction disturbance areas where the land has historically or is currently being farmed to identify the possibility of and to delineate the extent of pesticide and/or herbicide contamination. Materials containing elevated levels of pesticide or herbicide in areas of trenching or excavation will require special handling and disposal procedures. The local Certified Unified Program Agency shall be contacted to provide oversight regarding the handling, treatment, and/or disposal options for pesticide or herbicide contaminated soil. Standard dust suppression procedures (as defined in Mitigation Measure AQ-1 *(Fugitive Dust Control)* shall be used in these construction areas to reduce airborne emissions of these contaminants and reduce the risk of exposure to workers and the public."	SCE is suggesting to modify Mitigation Measure Haz-1 for the following reasons: 1. The Federal Insecticide, Fungicide, and Rodenticide Act was amended in 1996, which requires pesticides distributed or sold in the US be registered with EPA and must show that pesticides "will not generally cause unreasonable adverse effects on the environment." Therefore, SCE does not expect land that only has agricultural use after 1996 would have related exposure risk to the workers and the public. 2. SCE believes California OSHA permissible exposure limits should be used as reference for comparison of the analytical results. SCE will have trained workers with appropriate PPE, as needed, as way to reduce exposure risk in case elevated concentration is found through soil sampling. 3. The local CUPA might not have jurisdiction to act as the oversight agency. Therefore, SCE suggests adding the phrase, "relevant entity" as an alternative. ***"Mitigation Measures for Impact HAZ-2*** **HAZ-1 Identify Pesticide/Herbicide Contamination**. Prior to Project construction, soil samples shall be collected and analyzed for pesticides and/or herbicides in proposed construction disturbance areas where, prior to the 1996, the land has historically been used for agricultural purposes ~~the land has historically or is currently being farmed to identify the possibility of and to delineate the extent of pesticide and/or herbicide contamination~~. In such areas, if the analysis results reveal concentrations in soil, which could result in concentrations in air that are higher than the California OSHA permissible exposure limits (PELs), trained workers with appropriate Personal Protective Equipment (PPE) will be utilized for construction activities. Materials containing elevated levels of pesticide or herbicide in areas of trenching or excavation will require special handling and disposal procedures. Soils that need to be disposed of shall be handled in accordance to applicable laws and regulations. The local Certified Unified Program Agency or relevant entity shall be contacted, as appropriate, ~~to provide oversight~~ regarding the handling, treatment, and/or disposal options for pesticide or herbicide contaminated soil. Standard dust suppression procedures (as defined in Mitigation Measure AQ-1, Fugitive Dust Control) shall be used in these construction areas to reduce airborne emissions of these contaminants, if present, and thereby reduce the potential risk of exposure to workers and the public."	D1-112
C.9.4.3	C.9-17	Final paragraph, last sentence: "Adherence to the updated SPCCs and regulations regarding cleanup of any drips or spill that occur during..."	Please update for clarification purposes as follows: "Adherence to the updated ~~SPCCs~~ SPCC Plans and regulations regarding cleanup of any drips or spill that occur during..."	D1-113

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.10.2.1	C.10-5	Final paragraph, first sentence: "The VSSP would be required to obtain NPDES coverage under the California General Permit for Discharges of Storm Water Associated with Construction Activity."	The General Permit is entitled "Discharges of Storm Water Associated with Construction Activities, not Activity. Please revise accordingly: "The VSSP would be required to obtain NPDES coverage under the California General Permit for Discharges of Storm Water Associated with Construction Activity~~ies~~."	D1-114
C.10.2.2	C.10-6	Heading "California Streambed Alteration Agreement"	To clarify the State Agency, please revise as follows: "California ~~Streambed Alteration Agreement~~ Fish and Game Code"	D1-115
C.10.4.2	C.10-9	First paragraph, second full sentence: "The potential for erosion of loose or destabilized soil would be further reduced through compliance with the General Permit for Discharges of Storm Water Associated with Construction Activity (Order No. 2009-0009-DWQ), which would require development of implementation of a SWPPP."	The CGP was amended two times during 2010 and 2012. Please revise accordingly. "The potential for erosion of loose or destabilized soil would be further reduced through compliance with the Construction General Permit for Discharges of Storm Water Associated with Construction Activity~~ies~~ (Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) ("CGP"), which would require development of implementation of a SWPPP."	D1-116
C.10.4.2	C.10-9	Third full paragraph: "Construction of the proposed Project, including excavation and trenching, may encounter shallow groundwater. In the event that shallow groundwater is encountered, dewatering of the excavation or trenching site may be required. If improperly managed, these dewatering activities could result in the discharge of contaminated groundwater. Groundwater that is pumped from a subsurface construction site would be temporarily stored and tested prior to discharge. Contaminated groundwater would be treated prior to discharge or disposed of at an appropriate disposal facility or wastewater treatment plant. Prior to the discharge of any uncontaminated groundwater, SCE (as stated in the project description) would obtain all required permits (such as a waste discharge requirement or conditional waiver) from the applicable RWQCB."	Based on the analysis and the potential of dewatering activities, the respective dewatering permit may be required under NPDES requirements. "Construction of the proposed Project, including excavation and trenching, may encounter shallow groundwater. In the event that shallow groundwater is encountered, dewatering of the excavation or trenching site may be required. If improperly managed, these dewatering activities could result in the discharge of contaminated groundwater. Groundwater that is pumped from a subsurface construction site would be temporarily stored and tested prior to discharge. Contaminated groundwater would be treated prior to discharge or disposed of at an appropriate disposal facility or wastewater treatment plant. Prior to the discharge of any uncontaminated groundwater, SCE (as stated in the project description) would obtain all required permits (such as a waste discharge requirement or conditional waiver or dewatering permit, if applicable) from the applicable RWQCB."	D1-117
C.10.4.2	C.10-9	Last paragraph, fourth sentence: "Some activities, such as repairing or replacing damaged poles or towers, would result in a minor amount of ground disturbance."	As there are no towers on the proposed Project, please modify the language as follows: "Some activities, such as repairing or replacing damaged poles ~~or towers,~~ would result in a minor amount of ground disturbance."	D1-118

Comment Set D1 – Southern California Edison (cont.)

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Section	Page	DEIR Language	SCE Recommendations	
C.10.4.2	C.10-10	*First Heading:* ***"Impact HYD-2 (Criterion HYD2): Construction of the Project could deplete groundwater supplies or interfere with groundwater recharge. (Class II) "***	This Impact analyzes both the construction and operation related impacts. Please revise as follows: ***"Impact HYD-2 (Criterion HYD2): Construction and operation of the Project could deplete groundwater supplies or interfere with groundwater recharge. (Class II)"***	D1-119
C.10.4.2	C.10-10	First full paragraph, second sentence: "Water use during operation would be minimal, and would be limited mainly to the washing of insulators and dust suppression during repair work, if required."	Polymer insulators will be used for the proposed Project and, unlike older style ceramic insulators, do not require washing. Please revise the language as follows: "Water use during operation would be minimal, and would be limited mainly to ~~the washing of insulators and~~ dust suppression during repair work, if required."	D1-120
C.10.4.2	C.10-10	Second full paragraph, third sentence: "Also if the extracted groundwater is to be free of contamination, that water may be discharged locally and allowed to infiltrate back into the groundwater basin"	Per the CGP, the use of uncontaminated groundwater can be utilized for dust control or other uses (compaction, irrigation, etc.), which should be highlighted related to the CA Drought Mandate. Please revise as follows: "Also if the extracted groundwater is to be free of contamination, that water may be utilized for dust control and/or discharged locally and allowed to infiltrate back into the groundwater basin, where approval will be obtained through the SARWQCB and/or SDRWQCB."	D1-120
C.10.4.2	C.10-11	**Mitigation Measure for Impact HYD-2:** "HYD-1 Use of Non-Potable Water. Project water supply for dust control, soil compaction activities, and site estoration/revegetation shall be obtained from non-potable sources, if available, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the California Public Utilities Commission a minimum of 60 days prior to the start of construction."	The cost of transportation of hauling non-potable water could limit the practicality of usage. Placing a restriction that non-potable sources (if available) should be obtained may include areas where transportation costs may not be feasible. Therefore, SCE recommends to revise as follows: "HYD-1 Use of Non-Potable Water. Project water supply for dust control, soil compaction activities, and site restoration/revegetation shall be obtained from non-potable sources, if available and is cost-effective, and ensured in a water contract through a local water agency or district. The Applicant shall provide a letter describing the availability of non-potable water and efforts made to obtain it for use during construction to the California Public Utilities Commission a minimum of 60 days prior to the start of construction."	D1-121
C.10.4.2	C.10-11	Second paragraph, second sentence: "These activities would alter the existing drainage pattern in the Project area."	To clarify the conclusion that the existing drainage pattern will be permanently changed, this paragraph indicates that areas of temporary disturbance will be restored as close to pre-construction conditions as feasible. Therefore SCE recommends to revise as follows: "These activities would temporarily alter the existing drainage pattern in the Project area."	D1-122

Comment Set D1 – Southern California Edison (cont.)

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Section	Page	DEIR Language	SCE Recommendations	
C.11	C.11-1	First paragraph, second sentence: "The following discussion addresses existing environmental conditions in the affected area, identifies and analyzes environmental impacts for the proposed Project, and recommends measures to reduce or avoid significant impacts anticipated from Project construction, operation, and maintenance."	The intention of this section is to analyze the existing and proposed land use status rather than environmental conditions within the vicinity of the Proposed Project. Please revise accordingly for further clarification and accuracy. "The following discussion addresses existing ~~environmental conditions.~~ land uses in the affected area, identifies and analyzes ~~environmental impacts for~~ land use impacts of the proposed Project, and recommends measures to reduce or avoid significant impacts anticipated from Project construction, operation, and maintenance."	D1-123
C.11.1	C.11-1	Last paragraph: "In order to determine impacts to land use and planning (see Section C.11.4), this analysis has identified sensitive receptors within the Study Area. A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to contaminants and other hazards. Sensitive land uses where sensitive receptors are typically located include schools, day care facilities, playgrounds, churches, residences, and hospitals. Table C.11-1 summarizes the sensitive land uses that have been identified along the proposed Project route."	Sensitive receptors are used for Noise and Air Quality impact analyses. Please remove any references to "sensitive receptors," include the headings in Table C11-1, as this is not appropriate for land use and planning analysis. "In order to determine impacts to land use and planning (see Section C.11.4), this analysis has identified ~~sensitive receptors~~ land uses within the Study Area. ~~A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to contaminants and other hazards. Sensitive land uses where sensitive receptors are typically located include schools, day care facilities, playgrounds, churches, residences, and hospitals.~~ The Project route is located along several land uses including open areas, residential such as medium-density and rural residential areas, commercial/industrial areas, and agricultural areas. Table C.11-1 summarizes the ~~sensitive~~ land uses that have been identified along the proposed Project route."	D1-124
C.11.4.2	C.11-7	Last paragraph, first sentence: "Residential and non-residential sensitive land uses within the Study Area were identified in Table C.11-1."	In contrast with the analyses of Air Quality and Noise, none of the significance criteria for land use incorporates any references to sensitive receptors. Therefore, SCE recommends that references to "sensitive receptors" be removed from this section. "Residential and non-residential ~~sensitive~~ land uses within the Study Area were identified in Table C.11-1."	D1-125
C.11.4.2	C.11-8	Last paragraph, first sentence: "Direct construction-related impacts would typically cause direct effects on land uses within approximately 1,000 feet of either side of a given ROW, or within approximately 1,000 feet of pulling,..."	Ensure the word, "temporary," is included where appropriate to emphasize these impacts are not permanent. "~~Direct c~~Construction ~~-related impacts~~ activities would typically cause direct temporary effects on land uses within approximately 1,000 feet of either side of a given ROW, or within approximately 1,000 feet of pulling,..."	D1-126

Comment Set D1 – Southern California Edison (cont.)

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SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.11.4.2	C.11-9	Last full sentence at the bottom of Page C.11-9 and top of Page C.11-10 states: "As outlined in Table C.11-1, construction of the proposed Project would affect numerous residential areas. Depending on the specific construction activity, work crews at any given location may be as many as 55 persons. Construction activities would occur over a 16-month period. Due to the proximity of some residential uses to construction-related activities, in conjunction with the intensity of the workforce and equipment needed and the duration of construction itself, the impacts to residential uses which are outlined above would be considered adverse."	In reference to DEIR Section B.4.11 Construction Workforce and Equipment (page B-44), this language needs to clarify that approximately 55 subtransmission and distribution personnel may be working on any given day, at various locations along the proposed Project Corridor. The impacts to residential uses would be minimal and of short duration. SCE recommends the language be modified to: "As outlined in Table C.11-1, construction of the proposed Project would affect numerous residential areas. ~~Depending on the specific construction activity, work crews at any given location may be as many as 55 persons.~~ SCE anticipates approximately 55 subtransmission and distribution construction personnel working on any given day on various construction locations throughout the entire project corridor. Construction activities would occur over a 16-month period. Due to the proximity of some residential uses to construction-related activities, ~~, in conjunction with the intensity of the workforce and equipment needed and the duration of construction itself, However,~~ the impacts to residential uses which are outlined above would be minimal and of relatively short duration and would not be considered adverse."	D1-127
C.11.4.2	C.11-10	Mitigation Measure LU-1 under Mitigation Measure for Impact LU-1 states: "**LU-1 Property Access and Restoration.** Southern California Edison (SCE) shall ensure that all affected property owners within 300 feet of the right-of-way (ROW) are always provided with at least one point of vehicular (passenger car and truck) and pedestrian access to their respective properties throughout all phases of construction. Immediately following the completion of construction, SCE shall ensure that all properties and uses affected by construction outside of the ROW are fully restored to their pre-construction conditions."	Mitigation Measure LU-1 as currently written may be construed as providing affected property owners with unrestricted vehicular and pedestrian access at times which might otherwise be unreasonable or unfeasible, for example, the stringing of overhead conductors could require the temporary closure of a road or travel lanes on affected roadway segments during the stringing activity. A temporary closure may not be allowed under LU-1 because it might conflict with the requirement that certain landowners "always" have access to their property. In addition, as with the areas temporarily impacted by construction as described in DEIR Section B.4.6.1 in the first paragraph following Clean up and Post-Construction Restoration on page B-30, these construction areas "would be cleaned up and restored to as close to pre-construction conditions as feasible, or to the conditions agreed upon between the landowner and SCE following the completion of construction." Therefore, please revise as follows: "**LU-1 Property Access and Restoration.** Southern California Edison (SCE) shall ensure that all affected property owners within 300 feet of the right-of-way (ROW) are ~~always~~ provided with at least one point of vehicular (passenger car and truck) and pedestrian access to their respective properties throughout all phases of construction. Immediately following the completion of construction, SCE shall ensure that all properties and uses affected by construction outside of the ROW are ~~fully~~ restored to the extent feasible to their pre-construction conditions or to the conditions agreed upon between the landowner and SCE following the completion of construction."	D1-128

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.12.1.2	C.12-7	First paragraph: "An example of noise sensitive receptors would be schools, hospitals, libraries, rest homes, residences, and passive recreational facilities; places where peace and quiet is generally expected. The closest noise sensitive receptors to the proposed Project are residences, which are located within 50 feet of the proposed 115-kV subtransmission line, on Leon Road, Bow Bridge Drive, and Promontory Parkway in unincorporated Riverside County."	Please include the following noise sensitive receptors to be consistent with the rest of the section/document. "An example of noise sensitive receptors would be schools, hospitals, libraries, rest homes, mental care facilities, places of worship, residences, and passive recreational facilities; places where peace and quiet is generally expected. The closest noise sensitive receptors to the proposed Project are residences, which are located within 50 feet of the proposed 115-kV subtransmission line, on Leon Road, Bow Bridge Drive, and Promontory Parkway in unincorporated Riverside County."	D1-129
C.12.3	C.12-15	Second paragraph, first sentence: "In its Preliminary Environmental Assessment (PEA), SCE has listed a number of Applicant-Proposed Measures (APMs) that are designed to reduce impacts from the proposed Project."	SCE's PEA stands for Proponent's Environmental Assessment. Please revise globally as it appears in a majority of the Applicant Proposed Measures sections of the DEIR. "In its ~~Preliminary~~ Proponent's Environmental Assessment (PEA), SCE has listed a number of Applicant-Proposed Measures (APMs) that are designed to reduce impacts from the proposed Project."	D1-130
C.12.4.2	C.12-18	"*Mitigation Measures for Impact NOI-1* **NOI-1 Construction Work Hours.** No construction activities shall occur outside the following hours and days without prior written approval from the California Public Utilities Commission (CPUC). Southern California Edison (SCE) shall provide a minimum of five days advanced notification to the CPUC, the local jurisdiction, and residences within 300 feet of the anticipated work, including a general description of the work to be performed, location, and hours of construction anticipated."	As currently drafted, Mitigation Measure NOI-1 does not specify under what particular circumstances the CPUC might issue a written approval for construction work outside of the hours listed for each jurisdiction. However, as explained in the Project Description (page B-52), SCE has already committed to conduct or stagger construction activities in a manner designed to ensure that noise generated during construction would not exceed local municipal noise regulations. Moreover, for those rare occasions where work outside the hours identified in those regulations would occur (e.g. if existing lines must be taken out of service for work to be performed safely and the line outage must be taken at night for system reliability reasons, or if construction needs require continuous work), SCE is committed to providing advance notice and to routing all construction traffic away from residences, schools, and recreational facilities to the maximum extent feasible. *"Mitigation Measures for Impact NOI-1* **NOI-1 Construction Work Hours.** No construction activities shall occur outside the following hours and days ~~without prior written approval from the California Public Utilities Commission (CPUC).~~ unless Southern California Edison (SCE) ~~shall~~ provides a minimum of five days advanced notification to the CPUC, the local jurisdiction, and residences within 300 feet of the anticipated work, including a general description of the work to be performed, location, and hours of construction anticipated. SCE shall also route all construction traffic away from residences, schools, and recreational facilities to the maximum extent feasible."	D1-131

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.13.1.1	C.13-8	Second bulleted item: • "**Voorburg Park.** This park is located at 39960 Nicolas Road in the City of Temecula, southeast of the proposed Project. This park encompasses 0.75 acre and includes an open grass area, barbeques, and picnic tables. Nakayama Park is located at 30592 Nicolas Road in the City of Temecula, southeast of the proposed Project. This park encompasses 0.28 acre and includes a basketball court, a children's play area, barbeques, picnic tables, and shelters (City of Temecula, 2014)."	SCE recommends the following revision for the Parks in Temecula. • "**Voorburg Park.** This park is located at 39960 Nicolas Road in the City of Temecula, southeast of the proposed Project. This park encompasses 0.75 acre and includes an open grass area, barbeques, and picnic tables. • Nakayama Park. This park is located at 30592 Nicolas Road in the City of Temecula, southeast of the proposed Project. This park encompasses 0.28 acre and includes a basketball court, a children's play area, barbeques, picnic tables, and shelters (City of Temecula, 2014)."	D1-132
C.13.4.2	C.13-14	**C.13.4.2 Impact Analysis – Direct and Indirect Effects** ***Impact REC-1 (Criterion REC1): The Project could cause physical deterioration to existing neighborhood and regional parks. (Class III)*** *Construction:* "Contractor construction personnel would be managed by SCE construction management personnel and based out of the contractor's existing yard or potential temporary material staging yard set up for the proposed Project."	To allow for the option of contractors managing construction personnel, and to clarify that contractors would not be based out of an SCE substation, SCE recommends that the language be revised as follows: "Contractor construction personnel would be managed by SCE ~~construction management~~ and/or contractor personnel and would be based out of the contractor's existing yard or potential temporary material staging yard set up for the proposed Project."	D1-133
C.13.4.2	C.13-16	"**REC-1 Identify and Provide Noticing of Alternative Recreation Areas.**"	The title to this mitigation measure (REC-1) suggests that the measure is requiring the applicant to identify "alternative" recreation areas for use by members of the public. However, the text of the measure does not include any requirement that SCE identify alternative locations for recreationalists, only that SCE identify and post notices at the recreational areas "affected" by the Project. Therefore, SCE recommends that the measure be re-titled as follows: "**REC-1 Identify and Provide Noticing of ~~Alternative~~Affected Recreation Areas.**" Note that the title to this measure also appears in several other places in the DEIR, including pages C.13-15 and C.13-18.	D1-134

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations
C.13.4.2	C.13-16	Beginning with first sentence after heading **REC-1 Identify and Provide Noticing of Alternative Recreation Areas**: "SCE shall coordinate with applicable local or regional agencies for all recreational areas affected by Project construction for the following purposes: • Identify recreational areas (e.g. trails) that would be closed or limited in use during Project construction activities; • To the extent feasible, for recreation areas that would be unavailable to the public due to Project construction, schedule construction activities to avoid heavy recreational use periods (including major holidays); • Post a public notice that identifies construction information (e.g. schedule, contact person) at or near the recreational areas affected by Project construction; and • Restore affected recreational areas to pre-construction conditions. SCE shall document these coordination efforts with local and regional agencies and identify how noticing and restoration at affected recreational use areas will be accomplished."	For clarification regarding coordination with applicable local or regional agencies for the Proposed Project, please make the following revisions: "SCE shall coordinate with applicable local or regional agencies and/or an agency representative for all recreational areas affected by Project construction for the following purposes: • Identify recreational areas (e.g. trails) that would be closed or limited in use during Project construction activities; • To the extent feasible, for recreation areas that would be unavailable to the public due to Project construction, schedule construction activities to avoid heavy recreational use periods (including major holidays); SCE shall use best efforts to schedule construction activities to avoid heavy recreational use periods, including major holidays, in coordination with the agency representative. • Post a public notice that identifies construction information (e.g. schedule, contact person) at or near the recreational areas affected by Project construction; and • Restore affected recreational areas to pre-construction conditions as agreed upon between SCE and the local or regional agencies and/or an agency representative. SCE shall document these coordination efforts with local and regional agencies and/or an agency representative and identify how noticing and restoration at affected recreational use areas will be accomplished."

D1-135

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.14.2.2	C.14-5	Third full paragraph after heading **Caltrans:** "In addition, Caltrans prepares various planning documents for its transportation facilities throughout the State. The goals established for specific highways are documented in transportation concept reports (TCR). Based on the TCR's for freeways providing regional access to the Project, Caltrans has identified the following performance standards near the Project area (SCE, 2014): • I-15: LOS of E (as shown in Table C.14-2, this performance standard is already exceeded under existing conditions). • I-215: LOS D (as shown in Table C.14-2, this performance standard is already exceeded under existing conditions). • SR-74: LOS D. • SR-79: LOS E."	SCE recommends including the following language on Caltrans Regulation Section 660 regarding Caltrans Encroachment Permits and its requirements. Insert the following narrative after the last paragraph under the heading, Caltrans. (Narrative to the left is the last paragraph) "In addition, Caltrans prepares various planning documents for its transportation facilities throughout the State. The goals established for specific highways are documented in transportation concept reports (TCR). Based on the TCR's for freeways providing regional access to the Project, Caltrans has identified the following performance standards near the Project area (SCE, 2014): • I-15: LOS of E (as shown in Table C.14-2, this performance standard is already exceeded under existing conditions). • I-215: LOS D (as shown in Table C.14-2, this performance standard is already exceeded under existing conditions). • SR-74: LOS D. • SR-79: LOS E. Caltrans issues encroachment permits under authority of law as defined in Section 660 of the California Streets and Highways Code for any proposed encroachments defined as "any tower, pole, pole line, pipe, pipeline, fence, billboard, stand or building, or any structure, object of any kind or character not particularly mentioned in the section, or special event, which is in, under, or over any portion of the State highway right-of-way. "Special event" means any street festival, sidewalk sale, community-sponsored activity, or community-approved activity." A permit application for the encroachment activities, along with a traffic control plan designed and signed by a California Registered Engineer shall be submitted to Caltrans for review and approval."	D1-136
C.14.4.2	C.14-9	First paragraph, second sentence: "This should also include feasible ways to avoid construction related trips on I-5 and I-215 during peak traffic periods."	The proposed Project is located in the vicinity of I-15, not I-5. This just appears to be a typo. Please revise accordingly: "This should also include feasible ways to avoid construction related trips on I-15 and I-215 during peak traffic periods."	D1-137

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
C.14.2	C14-14	Mitigation Measure TRA-3 states: "**TRA-3 Repair Roadways and Transportation Facilities Damaged by Construction Activities.** If roadways, sidewalks, bike lanes, medians, curbs, shoulders, or other such transportation features are damaged by Project construction activities, as determined by the affected public agency, such damage shall be repaired and restored to their pre-Project condition by Southern California Edison (SCE). Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by heavy delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all transportation facilities within 500 feet in each direction of the Project and construction yard access points (where heavy vehicles will leave public roads to reach Project sites), and shall provide the California Public Utilities Commission (CPUC), the respective local jurisdictions, and the California Department of Transportation (Caltrans) [if applicable] with a copy of these images."	The requirement that SCE shall photograph or video record all transportation facilities within 500 feet in each direction of the Project at least 30 days prior to construction and provide a list of agencies a copy of the images does not appear to avoid or minimize a significant environmental impact as required for a mitigation measure under CEQA. Therefore, TRA-3 should be revised as follows: "**TRA-3 Repair Roadways and Transportation Facilities Damaged by Construction Activities.** If roadways, sidewalks, bike lanes, medians, curbs, shoulders, or other such transportation features are damaged by Project construction activities, as determined by the affected public agency, such damage shall be repaired and restored to their pre-Project condition by Southern California Edison (SCE). ~~Prior to construction, SCE shall confer with agencies having jurisdiction over the roads anticipated to be used by heavy delivery vehicles and equipment. At least 30 days prior to construction, SCE shall photograph or video record all transportation facilities within 500 feet in each direction of the Project and construction yard access points (where heavy vehicles will leave public roads to reach Project sites), and shall provide the California Public Utilities Commission (CPUC), the respective local jurisdictions, and the California Department of Transportation (Caltrans) [if applicable] with a copy of these images.~~"	D1-138
D.1.2	D-2	Last sentence of page D-2 states: "The CPUC's proceedings will separately and specifically consider cost issues."	Please clarify that the CPUC proceeding for a Permit To Construct may only consider costs in determining the economic feasibility of an alternative should it become an issue, consistent with CEQA Guidelines Section 15364. Please revise as follows: "The CPUC's proceedings ~~will separately and specifically~~ may consider cost issues should the economic feasibility of an alternative under CEQA become an issue."	D1-139
D.3.1	D-3	First sentence of last paragraph states: "This alternative would be approximately 19 miles in length and would follow Segment 1 of the proposed Project for the first approximately eight miles."	To clarity the beginning point of Segment 1, please revise the sentence as follows: "This alternative would be approximately 19 miles in length and would follow Segment 1 of the proposed Project beginning at SCE Valley Substation for the first approximately eight miles"	D1-140

Comment Set D1 – Southern California Edison (cont.)

VSSP DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS

Section	Page	DEIR Language	SCE Recommendations	
D.3.2	D-28	Fourth full paragraph states: "The technology that would be used for the underground portions of this alternative would consist of single-circuit, cross-linked polyethylene, stranded-dielectric copper cables installed in a concrete-encased duct bank. The specific components of undergrounding, as well as the construction equipment necessary for underground construction, are described below. This information is based on the proposed underground portion of the proposed Project and from a previously-reviewed CPUC project with an underground component (CPUC, 2007)."	SCE has confirmed installation of this type of cable for the Partial Underground Alternative, therefore recommends to delete the reference to the (CPUC, 2007). "The technology that would be used for the underground portions of this alternative would consist of single-circuit, cross-linked polyethylene, stranded-dielectric copper cables installed in a concrete-encased duct bank. The specific components of undergrounding, as well as the construction equipment necessary for underground construction, are described below. ~~This information is based on the proposed underground portion of the proposed Project and from a previously-reviewed CPUC project with an underground component (CPUC, 2007).~~"	D1-141
E.3	E-3	Last paragraph, first sentence: "It is estimated that the total permanent land disturbance for the proposed Project would be approximately 14.2 acres, while the temporary land disturbance would be approximately 194 acres."	The acreage below is not consistent with Table B-7. Subtransmission Approximate Land Disturbance on Page B-37. The total acreage for Acres Disturbed During Construction is 194. The acreage for Acres to be Restored is 179.3 (temporary land disturbance) and the acreage for Acres Permanently Disturbed is 14.2. Therefore, please revise as follows: "It is estimated that the total permanent land disturbance for the proposed Project would be approximately 14.2 acres, while the temporary land disturbance would be approximately ~~194~~ 179.3 acres."	D1-142
E.3	E-4	Fifth full paragraph, first sentence: "The amount of Project-related ground disturbance... each tower location..."	SCE proposes to install TSPs, rather than towers – as is noted in the Project Description. Please revise as follows: "The amount of Project-related ground disturbance... each ~~tower~~ pole location..."	D1-143

Responses to Comment Set D1

D1-1 The Executive Summary has been revised in response to the comments received in Comment Set D1.

D1-2 Figure ES-2 has been revised to correct the number of guy stub poles from 19 to 14 along Leon Road in Segment 1.

D1-3 The requested edits have been incorporated into the Final EIR.

D1-4 The requested edits have been incorporated into the Final EIR.

D1-5 The requested edits have been incorporated into the Final EIR.

D1-6 The requested edits have been incorporated into the Final EIR.

D1-7 The requested edit to Table B-1 (not Figure B-1) has been incorporated into the Final EIR.

D1-8 Figure B-1 has been revised to correct the number of guy stub poles from 19 to 14 along Leon Road in Segment 1.

D1-9 The requested edits have been incorporated into the Final EIR, but not as a footnote.

D1-10 The requested edits have been incorporated into the Final EIR.

D1-11 The requested edits have been incorporated into the Final EIR.

D1-12 The requested edits have been incorporated into the Final EIR.

D1-13 The requested edits have been incorporated into the Final EIR.

D1-14 The requested edits have been incorporated into the Final EIR.

D1-15 The requested edits have been incorporated into the Final EIR.

D1-16 The comment states that the application of color treatments for temporarily disturbed areas is undesirable. In order to clarify the focus of the impact discussion and mitigation measure, the text of Impact AES-3 (Criterion AES1) has been revised as follows:

Those areas of ~~temporary~~ permanent disturbance where the soils surface (characterized by high color, line, and texture contrasts) is exposed and/or removed, or where lighter-colored gravel is placed could exhibit considerable color contrast with adjacent darker vegetation and soil colors.

The comment also states that there would be few, if any, areas within which construction ground disturbance would result in a potentially significant visual impact requiring mitigation. This conclusion is consistent with the finding presented in Impact AES-3 where it states: "Given that the proposed Project would be primarily located within an existing ROW and/or accessible by adjacent public roadways, it is anticipated that only a limited amount of ground surface disturbance and use of graveled surfaces would occur. It is also expected that, given the relatively flat terrain through which the proposed Project would pass, the need for grading would be limited."

The comment also suggests that Mitigation Measure AES-3 improperly defers analysis of impacts to a post-approval stage and should be deleted. However, this is not the case as no further analysis is required. During construction, if the placement of light-gray gravel adjacent to darker-colored soils and vegetation results in substantial visual contrast visible to sensitive public viewing locations, the contractors are required to apply the approved colorant (e.g., Natina Rock, Eonite, or Permeon, or similar) to the gravel as specified in Mitigation Measure AES-3. Adherence to the measure will be monitored as part of the Mitigation Monitoring and Reporting Program and if additional guidance is needed, it will be provided by the CPUC's mitigation monitors, which is part of their role. If the placement of gravel does not result in substantial visual contrast, no colorant application will be necessary. The first sentence of Mitigation Measure AES-3 has been modified, as follows, to clarify the mitigation requirement:

~~Where~~ If construction ~~would~~ unavoidably introduces graveled surfaces that cause substantial visual contrast visible from sensitive public viewing locations, the graveled surfaces shall be treated with an appropriate color or material (e.g., Natina Concentrate, Eonite, or Permeon, or similar).

D1-17 Impact AES-7 has been modified to clarify that while SCE would generally comply with local work hour ordinances, some minor deviations might occur during unusual circumstances.

D1-18 SCE requests the elimination of Mitigation Measure AES-6 (*Treat Structure Surfaces*), claiming that its use of dulled light-gray galvanized materials and intent to dull (remove shine inherent with the galvanizing process) the pole surfaces makes AES-6 unnecessary. It is important to point out that the galvanizing process does not necessarily need to result in inherently shiny surfaces. The galvanizing process can be managed to provide a range of dulled and/or colored surfaces as has been done by SCE and other utility companies for previous projects, for both steel-pole and lattice-structure designs. Management of the galvanizing process and/or application of dulling techniques should effectively eliminate highly specular (shiny) surfaces that on some previous projects have caused substantial visual contrast. Mitigation Measure AES-6 merely puts in place a confirmation process to ensure the desired outcome occurs. Therefore, Mitigation Measure AES-6 is retained.

D1-19 SCE requests that Table C.2-3 be corrected to accurately reflect that the proposed Project would result in a significant and unavoidable visual impact at one location not two locations. The commenter is correct in that Table C.2-3 was not updated following the completion of a linear viewpoint analysis for KOP-2. The text in Table C.2-3 (Reason for Conclusion for AES-6) has been revised as requested.

D1-20 The requested edits have been incorporated into the Final EIR.

D1-21 As stated in the Draft EIR, the proposed route would not traverse Williamson Act lands. A definition of Williamson Act Prime and Williamson Act nonrenewal has been added in response to this comment.

D1-22 The reference to Agricultural Preserve was added to the significance criterion because this is a designation found in the County of Riverside. Eight separate parcels are under an Agricultural Preserve in the County as discussed in Section C.3 (Agricultural Resources) of the EIR. The County's Agricultural Preserve Program is founded on the provisions of the Williamson Act. Therefore, there is no need to remove reference to Agricultural Preserve in Criterion AG3.

D1-23 As noted in response to Comment D1-22 above, eight parcels under Agricultural Preserve are near the Project alignment (see Figures C.3-1a through C.3-1c). Therefore, reference to Agricultural Preserves is appropriate in the mitigation measure and has not been removed.

With regard to the comment on land use compatibility, we acknowledge that electrical transmission projects can be compatible with agricultural uses. However, this does not mean that construction and operation of a project will not have impacts on other land uses even if they are compatible uses. Land use compatibility is a different issue from determining whether or not a project will have impacts on the environment. No change is necessary in regard to this comment.

D1-24 See responses to comments D1-22 and D1-23. The commenter is requesting a change in the impact statement to state that the Project does not conflict with an Agricultural Preserve. However, the statement uses the term "could" which is not definitive and therefore, no change is necessary to the impact statement.

D1-25 The suggested changes are acceptable and have been incorporated in the mitigation measure.

D1-26 The suggested change does not apply. There are eight parcels near the Project alignment. See response to Comments D1-22 through D1-25 above.

D1-27 The commenter requests that Impact AG-4 and the analysis conducted under this impact be deleted from the EIR. The analysis is an applicable analysis that is conducted on many projects to assess the change in land use from agricultural use to another use. The analysis is consistent with CEQA requirements and has not been deleted from the document.

D1-28 As noted earlier, we acknowledge that electrical transmission facilities are compatible uses with agricultural lands. The analysis in no way implies that the proposed Project is not a compatible use in the Project area. However, the suggested changes are not appropriate for the discussion of cumulative impacts. We have added the term "potential" before the term "conflict" as the discussion clearly points out that the potential conflict is related to construction potentially disrupting agricultural operations. Also, see the responses to the comments above for more information.

D1-29 The change requested to Table C.3-4 was not made. The discussion of converting agricultural land to another use is a valid and appropriate analysis and was not removed from the EIR.

D1-30 The requested edit has been incorporated into the Final EIR.

D1-31 The requested edit has been incorporated into the Final EIR.

D1-32 The requested edits have been incorporated into the Final EIR.

D1-33 The 2012 AQMP was not fully approved at the time the Draft EIR was prepared. However, it appears to be fully approved as of March 2016, so the requested edits were made. Other edits to the current approved AQMP status have also been made. The requested edits have been incorporated into the Final EIR.

D1-34 The requested edit has been incorporated into the Final EIR.

D1-35 The requested edit has been incorporated into the Final EIR.

D1-36 The requested edits have been incorporated into the Final EIR. The revision to the mitigation measure would not affect the mitigation efficiency.

D1-37 The requested edits have not been incorporated into the Final EIR. Although SCE has committed to avoiding riparian and wetland habitats (as described in APM BIO-8), the potential impact corridor provided by SCE for use in the analysis presented in the EIR includes such habitats. Additional text has been included in the Final EIR to indicate SCE's commitment and that the reported impact acreages are a result of the tentative design/impact corridor provided for analysis in the EIR.

D1-38 The reference to brown headed cowbirds as exotic has been revised in the Final EIR to indicate that they are a native, but invasive/parasitic species.

D1-39 The requested edits have not been incorporated into the Final EIR. Willow flycatcher (*Empidonax traillii*) is State listed as endangered under the California Endangered Species Act; current listing status was verified in the April 2016 State and Federally Listed Endangered and Threatened Animals of California.

The list is available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline

D1-40 The requested edits have not been incorporated into the Final EIR. Section 6.2.5.21 of the TRC Biological Resources Assessment, provided as part of the PEA and dated March 2013, states the following:

A pair of these birds was observed adjacent to the northern parts of the Proposed Project survey area (refer to Figure 15) on one date in 2012, suggesting nesting in the local mountains.

D1-41 The requested edit has been incorporated into the Final EIR.

D1-42 The requested edit has not been incorporated into the Final EIR. Refer to response to comment D1-39 for additional information.

D1-43 The requested edits have not been incorporated into the Final EIR. Refer to response to Comment D1-37 for additional information.

D1-44 The requested edits have not been incorporated into the Final EIR. Based on field reconnaissance surveys, using the data provided in the PEA, edits and additions were made to both mapped vegetation communities/land cover types and jurisdictional features; these changes were made based on field observations made in May 2015. Refer to response to comment D1-37 for additional information.

D1-45 The requested edit has not been incorporated into the Final EIR. Refer to response to comment D1-37 for additional information.

D1-46 The requested edits have not been incorporated into the Final EIR. Although SCE has committed to becoming a PSE with the MSHCP, SCE has not provided a "Certificate of Inclusion" identifying them as a PSE nor have they provided proof of mitigation fee payments. As with other recent projects (i.e., West of Devers), although SCE has made a commitment to become a PSE with the MSHCP, this is a process by which approval is required to gain this status and it is not guaranteed. Therefore, the proposed mitigation has been developed to minimize and/or reduce impacts to less-than-significant levels should PSE status not be obtained.

D1-47 The requested edit has been incorporated into the Final EIR.

D1-48 The requested edit, with minor modifications, has been incorporated into the Final EIR.

D1-49 The requested edit, with minor modifications, has been incorporated into the Final EIR.

D1-50 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-51 The requested edit has been incorporated into the Final EIR.

D1-52 The requested edits have not been incorporated into the Final EIR. Although SCE has committed to avoiding riparian and wetland habitats (as described in APM BIO-8), the potential impact corridor provided by SCE for use in the analysis presented in the EIR includes such habitats. Additional text has been included in the Final EIR to indicate SCE's commitment and that the reported impact acreages are a result of the tentative design/impact corridor provided for analysis in the EIR.

The text of Mitigation Measure BIO-3 (*Compensation for Permanent Impacts to Sensitive Vegetation Communities*) clearly states that to compensate for impacts to sensitive vegetation communities from the construction of the VSSP, SCE shall restore all temporary impact areas. The measure also states that the creation or restoration of habitat shall be required for all permanent impacts to sensitive vegetation communities. The replacement ratios for permanent impacts to riparian vegetation are 3:1; a ratio of 1:1 shall be applied to all other sensitive communities (including non-native annual grassland).

Although SCE has committed to becoming a PSE with the MSHCP, SCE has not provided a "Certificate of Inclusion" identifying them as a PSE nor have they provided proof of mitigation fee payments. As with other recent projects (i.e., West of Devers), although SCE has made a commitment to become a PSE with the MSHCP, this is a process by which approval is required to gain this status and it is not guaranteed. Therefore, the proposed mitigation has been developed to minimize and/or reduce impacts to less than significant levels should PSE status not be obtained.

D1-53 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-54 The requested edits have not been incorporated into the Final EIR. As stated in Mitigation Measure BIO-5 (*Implement Biological Construction Monitoring*), and consistent with other recent projects, no more than 30 days prior to the commencement of ground disturbance or site mobilization activities, SCE shall retain a qualified biologist(s), approved by the CPUC, to monitor VSSP construction. The biologist will have demonstrated expertise with special-status plants, terrestrial mammals, reptiles, and birds. Monitoring will occur during initial ground disturbance for each phase of construction.

Please refer to response to comment D1-46 regarding SCE's commitment to becoming a PSE with the MSHCP.

D1-55 The requested edit has not been incorporated into the Final EIR. While the referenced study does focus on European warblers, the study model is focused on the negative influence of construction and operation of new roads on birds. The fundamental effect on breeding birds, regardless of location, is valid for the analysis presented in the EIR.

D1-56 The requested edit, with minor modifications, has been incorporated into the Final EIR.

D1-57 The requested edit has been incorporated into the Final EIR.

D1-58 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-59 The requested edits have not been incorporated into the Final EIR. Please refer to response to comments D1-37 and D1-46.

D1-60 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-61 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-62 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-63 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-64 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-65 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-66 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-67 The requested edits have not been incorporated into the Final EIR. Depending on the time elapsed between the previously completed surveys and the start of VSSP construction, additional survey work may be required. USFWS guidelines state the following:

> *A complete survey consists of one wet season survey and one dry season survey conducted and completed in accordance with these guidelines and conducted within a 3-year period. The order of the surveys is not important.*

Since the USFWS guidelines allow for surveys to be conducted over a three-year period, the text of Mitigation Measure BIO-12 (*Complete Protocol-level Surveys for Vernal Pool and Riverside Fairy Shrimp*) has been revised to indicate that protocol level surveys will only be required if construction of the VSSP does not occur within three years of the surveys completed in 2013/2014.

In response to the comment regarding SCE's commitment to becoming a PSE with the MSHCP, please see response to comment D1-46

D1-68 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-67.

D1-69 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-67.

D1-70 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-67.

D1-71 The requested edits have not been incorporated into the Final EIR. Although SCE has committed to participating in the Stephens' kangaroo rat HCP, SCE has not provided documentation identifying them as a participant nor have they provided proof of mitigation fee payments. As with other recent projects (i.e., West of Devers), although SCE has made a commitment to become a participating member in the HCP, this is a process by which approval is required to gain this status and it is not guaranteed. Therefore, the proposed mitigation has been developed to minimize and/or reduce impacts to less-than-significant levels should their participation not be obtained.

Although SCE has committed to becoming a PSE with the MSHCP, SCE has not provided a "Certificate of Inclusion" identifying them as a PSE nor have they provided proof of mitigation fee payments. As with other recent projects (i.e., West of Devers) although SCE has made a commitment to become a PSE with the MSHCP this is a process by which approval is required to gain this status and it is not guaranteed. Therefore, the proposed mitigation has been developed to minimize and/or reduce impacts to less-than-significant levels should PSE status not be obtained.

D1-72 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-71.

D1-73 The requested edits have not been incorporated into the Final EIR. The potential impact corridor provided by SCE for use in the analysis presented in the EIR includes populations of the federally endangered San Diego ambrosia. Mitigation Measure BIO-18 *(Conduct Pre-construction Surveys for State and Federally Threatened, Endangered, Proposed, Petitioned, Candidate, or other Special-Status Plants and Implementation of Avoidance Measures)* requires that buffers be placed around occurrences of this species and the plants avoided to the extent possible. Where impacts to listed plants are determined to be unavoidable, the USFWS and/or CDFW shall be consulted for authorization. Additional mitigation measures to protect or restore listed plant species or their habitat, including but not limited to a salvage plan including seed collection and replanting, may be required by the USFWS or CDFW before impacts are authorized, whichever is appropriate.

Refer to response to comment D1-46 regarding PSE status with the MSHCP.

D1-74 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-75 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-76 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-77 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-78 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-79 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-80 The requested edits have not been incorporated into the Final EIR. Mitigation Measure BIO-22 provides additional details as to survey requirements, above and beyond those presented in Mitigation Measures BIO-1, BIO-2, and BIO-5. More specifically, Mitigation Measure BIO-22 requires that focused surveys consist of a minimum of three daytime surveys and one nighttime survey within one week of vegetation clearing.

D1-81 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-80.

D1-82 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-83 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-84 The requested edit, with minor modifications, has been incorporated into the Final EIR.

D1-85 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-86 The requested edits have not been incorporated into the Final EIR. As stated under Impact BIO-16, because the VSSP would remove or disturb vegetation and these animals would be subject to mortality from construction activities, impacts to these species would be considered significant absent mitigation. As presented under Impact BIO-1, based on the proposed impact area provided by SCE, construction of the VSSP could result in up to 9.95 acres of permanent and 218.39 acres of temporary impacts.

Please refer to response to comment D1-46 regarding SCE's participation in the MSHCP.

D1-87 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-88 The requested edits have not been incorporated into the Final EIR. As stated under Impact BIO-1, based on the proposed impact area provided by SCE, construction of the VSSP could result in up to 9.95 acres of permanent and 218.39 acres of temporary impacts.

As stated under Impact BIO-17, the CPUC considers those plants ranked as CRPR 1A, 1B or 2 to meet CEQA's Section 15380 criteria, and adverse effects to these species are generally considered "significant" except where substantial data may show otherwise.

Additional text has been added to Mitigation Measure BIO-24 (*Compensate for Impacts to Special-Status Plant Species*)[10] indicating that compensatory mitigation will only be required if VSSP impacts result in the loss of more than 10 percent of the on-site population of any special-status plant species with a CRPR rank of 1A, 1B, or 2. Compensation for impacts to CRPR rank 3 and 4 species will not be required.

D1-89 Mitigation Measure BIO-24 has been removed and combined with Mitigation Measure BIO-18 as requested. Refer to response to comment D1-88 regarding compensation for impacts to special-status species.

[10] Previously Mitigation Measure BIO-25 in the Draft EIR.

D1-90 The requested edits have not been incorporated into the Final EIR. As described under Impact BIO-18, SCE's PEA identified four individual burrowing owls and numerous suitable burrows within or adjacent to the VSSP site during surveys conducted from 2012-2014; burrowing owls were most often observed in disturbed or grassland habitats. (A fifth burrowing owl location was identified more than 2,000 feet from the Project alignment.) The VSSP would permanently impact 0.30 acres and temporarily impact 15.14 acres of annual grassland habitat, which is known to support burrowing owls. In addition, fallow agricultural fields and the borders of agricultural fields are known to support burrowing owls.

Construction of the VSSP would temporarily affect foraging and breeding habitat for this species. The potential effects of the project to burrowing owls depend on many factors including the number of owls present in the VSSP and how the species utilizes the area (i.e., migratory stopover, year round, breeding, or wintering). For the VSSP, the burrowing owls appear to be breeding birds and may be year round residents. Direct impacts to burrowing owls would include the crushing of burrows, removal or disturbance of vegetation, increased noise levels from heavy equipment, increased human presence, and exposure to fugitive dust. Indirect impacts could include the loss of habitat due to the colonization of noxious weeds, mowing or grazing of existing vegetation and the degradation of foraging habitat.

Please refer to response to comment D1-46 regarding SCE's participation in the MSHCP.

D1-91 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-46.

D1-92 The requested edits have not been incorporated into the Final EIR. Although SCE has committed to avoiding riparian and wetland habitats (as described in APM BIO-8), the potential impact corridor provided by SCE for use in the analysis presented in the EIR includes such habitats. Additional text has been included in the Final EIR to indicate SCE's commitment and that the reported impact acreages are a result of the tentative design/impact corridor provided for analysis in the EIR.

D1-93 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-92.

D1-94 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-92.

D1-95 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-92.

D1-96 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-92.

D1-97 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-92.

D1-98 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-92.

D1-99 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-92.

D1-100 The requested edits have not been incorporated into the Final EIR. Please refer to response to comment D1-92.

D1-101 The requested edits have been incorporated into the Final EIR.

D1-102 The requested edits have been incorporated into the Final EIR.

D1-103 The requested edits have been incorporated into the Final EIR.

D1-104 The requested edits have been incorporated into the Final EIR.

D1-105 The requested edits have been incorporated into the Final EIR.

D1-106 The requested edits have been incorporated into the Final EIR.

D1-107 The Final EIR text has been modified to include the recommended edits and to clarify that the potential for erosion is greatest in areas underlain by soils with moderate to high erosion potential.

D1-108 The text in Table C.7-4 has been modified to clarify the significance conclusion for Impact GEO-4 of Class II pertains to Segment 1.

D1-109 The requested edits have been incorporated into the Final EIR.

D1-110 The requested edits have been incorporated into the Final EIR.

D1-111 The requested edits have been incorporated into the Final EIR.

D1-112 The Final EIR text has been modified to reflect the recommended edits and additional text describing the Federal Insecticide, Fungicide, and Rodenticide Act (amended in 1996) has been added to Final EIR Section C.9.2.2.

D1-113 The requested edits have been incorporated into the Final EIR.

D1-114 The requested edits have been incorporated into the Final EIR.

D1-115 The requested edits have been incorporated into the Final EIR.

D1-116 The requested edits have been incorporated into the Final EIR, with the exception of the acronym “CGP” which is not used in the section.

D1-117 The requested edits have been incorporated into the Final EIR.

D1-118 The requested edits have been incorporated into the Final EIR.

D1-119 The requested edits have been incorporated into the Final EIR. Additionally, since polymer insulators do not require washing, edits have been made to the Project Description (Section B.5, Operation and Maintenance) for consistency. Specifically, the discussion under Section B.5.2, has been changed, and the section title has been changed from “Insulator Washing” to “Insulators and Hardware”.

D1-120 The requested edits have been incorporated into the Final EIR.

D1-121 Non-potable water shall be used for dust control, if available. It will be the responsibility of SCE or its contractor to identify non-potable water options and make a case to the CPUC if such

options are not "available". Cost should not be a limiting factor. The requested edits have not been incorporated.

D1-122 The requested edit has been incorporated into the Final EIR.

D1-123 As a component of the EIR, it is appropriate for the land use analysis to address the environmental conditions of the Project area and to use the term "environmental impacts," which is a common term used to identify all impacts in an environmental document. Because both of these terms (environmental conditions; environmental impacts) are used in the introduction to the land use analysis, there is no need to add the suggested revisions.

D1-124 Use of the term sensitive receptors is applicable in the land use section, and we often include this table in the land use section so that it is accessible to the noise and air quality specialists for their analyses as well as other technical authors. The discussion of sensitive receptors is also an important element used in the land use analysis. The suggested changes have not been made.

D1-125 Sensitive receptors were addressed in the land use analysis and identified sometimes as "sensitive receptors" and other times by land use type (e.g. residences, schools). The information presented in Table C.11-1 (Sensitive Receptors) is an important component of the land use analysis. Therefore, the references to sensitive receptors were not removed from the land use section as suggested by this comment.

D1-126 The term "temporary" is used in the first sentence under Impact LU-1 to emphasize that the construction impacts are not permanent. Although we do not believe it is necessary to add reference to temporary in other locations, we did add "temporary" before "effects" in response to this comment.

D1-127 The commenter suggests changes to the impact analysis under Impact LU-1 regarding the distribution of the work crew. The paragraph was modified to add in the suggested discussion about the work crews but the suggestion on how to describe the impact was not included. While the statement now states that the work crews would not be concentrated in one location, there is still the possibility that work areas could overlap concentrating work crews in one area and during a similar timeframe. Therefore, the second suggested change was not made.

D1-128 The requested edits have been incorporated into the Final EIR.

D1-129 The requested edits have been incorporated into the Final EIR.

D1-130 The requested edit has been incorporated into the Final EIR.

D1-131 The requested edits have been incorporated into the Final EIR.

D1-132 The requested edits have been incorporated into the Final EIR.

D1-133 The requested edits have been incorporated into the Final EIR.

D1-134 The requested edit has been incorporated into the Final EIR.

D1-135 The requested edits with minor modifications have been incorporated into the Final EIR.

D1-136 The requested edits with minor modifications have been incorporated into the Final EIR.

D1-137 The requested edit has been incorporated into the Final EIR.

D1-138 The requested edits to Mitigation Measure TRA-3 (*Repair Roadways and Transportation Facilities Damaged by Construction Activities*) have not been incorporated into the Final EIR. The mitigation measure requires photography or video recording of existing transportation facility conditions to document existing road conditions at heavy vehicle ingress/egress points from public roadways (not the entire Project route) to ensure Project-related damage is fixed following construction. It is not intended to document road conditions along the entire Project route. The measure has been updated to clarify. This documentation protects both the agencies having jurisdiction over the roads and SCE.

D1-139 The requested edits have been incorporated into the Final EIR.

D1-140 The requested edits with minor modifications have been incorporated into the Final EIR.

D1-141 The requested edits have been incorporated into the Final EIR.

D1-142 The acreages presented in Section E (Other CEQA Considerations) in the Draft EIR were taken from Section B (Project Description), which is based on information from the PEA. However, the information in this section should have reflected the acreages identified in the Biological Resources analysis. The acreages estimated in Section C.5 (Biological Resources) were based on preliminary design information provided by SCE as part of the response to a Project data request and a face-to-face meeting between SCE and Aspen. Therefore, the original calculations presented in the PEA no longer apply because new data provided by SCE resulted in different acreage estimates. This section has now been revised to include 9.95 acres of permanent and 218.39 acres of temporary impact areas (approximate amounts were added).

D1-143 The requested edit has been incorporated into the Final EIR.