Responses to Comment Set D Southern California Edison

D-1 The commenter states that there are three repeating issues indicated in an attached matrix of SCE's comments and edits, including the suggestions to (1) add a footnote to certain sections to make clear that the Project's mitigation measures capture SCE's applicant proposed measures (APMs); (2) ensure that the language of mitigation measures in Chapter 5 is consistent with the mitigation monitoring plan in Chapter 6; and (3) add language describing the relationship of local regulations to public utilities projects under General Order 131-D.

Please see Responses to Comments D-2 though D-40 for responses to the matrix containing SCE's comments and edits. It is noted that SCE's comments primarily make clarifying corrections and do not substantively challenge the environmental analyses documented in the IS/MND or mitigation measures proposed in support of the Project.

D-2 This commenter requested that the text in Section 1.5 (Environmental Determination) of the Draft IS/MND be clarified to state that the APMs are superseded by the applicable mitigation measures. The following modifications have been made to the Final IS/MND, which are similar to what were suggested by the commenter:

SCE's PEA identified measures to address potentially significant environmental impacts—the, called Applicant Proposed Measures (APMs)—and these APMs are considered to be part of the description of the Proposed Project. Based on the Initial Study analysis, additional mitigation measures are identified for adoption to ensure that impacts of the Proposed Project would be less than significant. In this case, tThe additional mitigation measures recommended for the Proposed Project either supplement, or supersede all of SCE's proposed the APMs. SCE has agreed to implement all of the additional recommended mitigation measures as part of the Proposed Project.

D-3 The text of Mitigation Measure HYD-2 (Use Non-potable Water for Dust Control or Soil Compaction) in Section 1.5 and of Section 5.9 (Hydrology and Water Quality) in the Draft IS/MND has been updated, as suggested by the commenter and shown below, to match the mitigation measure language in Section 6 of the IS/MND:

MM HYD-2 Use Non-potable Water for Dust Control or Soil Compaction. Project water supply for dust control or soil compaction activities shall be obtained from non-potable sources, if reasonably available from local water purveyors, and ensured in a water contract through a local water agency or district.

D-4 The text in Section 4.14 (Applicant Proposed Measures) has been revised as suggested by the commenter and shown below to clarify that SCE's APMs are superseded by applicable mitigation measures:

4.14 Applicant Proposed Measures

SCE's PEA proposes to implement measures contained Applicant Proposed Measures (APMs) to ensure the Proposed Project would occur with minimal environmental impacts in a manner consistent with applicable rules and regulations. SCE pro-

poses to implement these measures during the design, construction, and operation of the Proposed Project in order to avoid or minimize potential environmental impacts.

Applicant Proposed Measures (SCE's originally proposed APMs) listed in Table 4-5 are included within and are superseded by various mitigation measures summarized in Section 6 in this IS/MND. The mitigation measures are considered part of the Proposed Project and are considered in the evaluation of environmental impacts (see Section 5, Environmental Analysis and Mitigation). CPUC approval would be based upon SCE adhering to the Proposed Project as described in this document, including this project description and the APMs, as well as any adopted mitigation measures identified by this Initial Study.

Table 4-5 details each APM by environmental issue area. In some cases, The mitigation measures presented referenced in Section 5 either expand upon or add detail to the APMs presented in Table 4-5 and for the purposes of the Proposed Project, supersede them., if necessary, to These mitigation measures ensure that potential impacts would be reduced to less than significant levels.

D-5 As suggested by the commenter, the location of the Highwind Substation staging yard has been updated in Table 4-2 (Potential Staging Yard Locations) of the Final IS/MND, as follows:

Table 4-2. Potential Staging Yard Locations				
Yard Name	Location	Condition	Approximate Area	Project Component
Highwind Substation	Southwest corner of Steuber Read Jameson Street and Highline Road	Previously disturbed	1 acre	Telecommunications

D-6 As suggested by the commenter, the text in Section 4.5 (Project Location) has been updated in the Final IS/MND, as follows:

A total of Approximately 320 miles of fiber optic conduit and telecommunications cable would be installed in a loop between the proposed Banducci Substation and the existing Cummings and Monolith Substations, located approximately 6 and 12 miles east of the Proposed Project site, respectively.

D-7 As suggested by the commenter, the text in Section 4.6 (Surrounding Land Uses and Setting) has been updated in the Final IS/MND, as follows:

The <u>majority of the</u> Proposed Project is located <u>entirely</u> within unincorporated Kern County, California.

D-8 As suggested by the commenter, the text in Section 4.10.1.6 (Perimeter and Landscaping) has been updated in the Final IS/MND to clarify permitting requirements, as follows:

Prior to commencing construction, SCE would develop an appropriate drought-resistant landscaping plan and perimeter wall design that would be submitted to in consultation with Kern County with the ministerial grading permit application for the Proposed Project.

- D-9 As suggested by the commenter, the text in Section 4.10.5 (Telecommunications Lines) has been updated in the Final IS/MND, as follows:
 - Continue west in approximately 160 feet of <u>existing new</u> conduit into the existing Monolith Substation.
- D-10 As suggested by the commenter, the text in Section 4.11.4.1 (Tubular Steel Pole Installation) has been updated in the Final IS/MND, as follows:

Excavated material would <u>either</u> be-<u>used as backfill for new TSPs, made available for use by the landowner, or disposed of off-site at an appropriately licensed waste <u>facility</u>temporarily stored in the staging yard prior to being salvaged, recycled, or <u>disposed</u>.</u>

D-11 As suggested by the commenter, the text in Section 4.11.4.2 (Wood Pole Installation) has been updated in the Final IS/MND, as follows:

Excavated material would either be used as backfill for new wood poles, made available for use by the landowner, or disposed of off-site at an appropriately licensed waste facility temporarily stored in the staging yard prior to salvage, recycling, or disposal.

D-12 As suggested by the commenter, the text in Section 4.11.4.3 (Lightweight Steel Pole Installation) has been updated in the Final IS/MND, as follows:

Excavated material would <u>either</u> be <u>used as backfill for new LWS poles, made available for use by the landowner, or disposed of off-site at an appropriately licensed waste facility temporarily stored in the staging yard prior to salvage, recycling, or disposal.</u>

D-13 As suggested by the commenter, the text in Section 5.5.1 (Cultural Resources, Setting, Archaeological Field Survey Results) has been revised as follows to clarify the Proposed Project Area covered by the archaeological surveys:

The Proposed Project Area includes the 6.3-acre substation site, and a total of approximately 320 miles of fiber optic telecommunication routes with a 30-meter buffer on either side of the routes (60-meter-wide survey corridor), and an approximately 1.77 acre staging area.

D-14 As suggested by the commenter and similar to Responses to Comments D-17, D-20, D-26, D-32, D-36, D-37, and D-38 for other IS/MND sections, the following text has been added to Section 5.3.1 (Air Quality, Setting, Regulatory Background) to clarify the relationship of local regulations to public utility projects:

Regulatory Background

The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies that protect or enhance air quality in the Proposed Project area.

CPUC General Order 131-D, Section XIV.B 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." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.

D-15 As suggested by the commenter, the text in Section 5.3.2.b (Environmental Impacts and Mitigation Measures) has been updated in the Final IS/MND, as follows. Given that the number of poles to be replaced and the length of conduit to be constructed is unchanged, this minor revision does not affect the air quality emissions calculations, analysis, or conclusions in the Draft IS/MND.

The Proposed Project would develop a 3.3-acre substation, subtransmission line segments, and <u>approximately</u> 320 miles of fiber optic <u>telecommunications</u> cable on poles and in conduit.

See Response to Comment D-13 for revisions made to Section 5.5.1 (Cultural Resources, Setting) regarding the length of the telecommunications route.

D-16 As suggested by the commenter, the text in Section 5.3.2.d (Environmental Impacts and Mitigation Measures) of the Final IS/MND has been revised as follows to clarify the location of sensitive receptors from the proposed substation site:

The proposed substation site would be approximately 1.60.25 miles from the nearest location of sensitive receptors. Three residences are within 0.5 miles of the substation site, with the nearest being 0.25 miles to the south on Pelliser Road. The California Correctional Institution; is approximately 1.6 miles east of the proposed substation site. The nearest residential development would be in the community of Stallion Springs, approximately 2 miles from the site. Three residences are within 0.5 miles of the substation site, with the nearest being 0.25 miles to the south on Pellister Road.

D-17 As suggested by the commenter and similar to Responses to Comments D-14, D-20, D-26, D-32, D-36, D-37, and D-38 for other IS/MND sections, the following text has been added to Section 5.4.1 (Biological Resources, Setting, Regulatory Background) in the Final IS/MND:

Regulatory Background

The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies that protect biological resources in the Proposed Project area.

CPUC General Order 131-D, Section XIV.B 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." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.

D-18 As suggested by the commenter and similar to Responses to Comments D-19, D-27, and D-40, the following footnote has been added to Section 5.4.1 (Biological Resources, Setting, Applicant Proposed Measures) to clarify that all of the biological resources APMs

have been superseded by applicable mitigation measures in the IS/MND. See also Response to Comment D-4.

- SCE's originally proposed APMs are part of the Proposed Project and have been considered in the evaluation of environmental impacts in this IS/MND. The mitigation measures recommended in Section 5.4.2 (Environmental Impacts and Mitigation Measures) and referenced in Section 6 (Mitigation Monitoring Plan) either expand upon or add detail to all of SCE's APMs, and for the purposes of the Proposed Project, supersede them.
- D-19 As suggested by the commenter and similar to Responses to Comments D-18, D-27, and D-40, the following footnote has been added to Section 5.5.1 (Cultural Resources, Setting, Applicant Proposed Measures) to clarify that APM PA-1 has been superseded by applicable mitigation measures in the IS/MND. See also Response to Comment D-4.
 - SCE's originally proposed APM PA-1 is part of the Proposed Project and has been considered in the evaluation of environmental impacts in this IS/MND. The mitigation measures recommended in Section 5.5.2 (Environmental Impacts and Mitigation Measures) and referenced in Section 6 (Mitigation Monitoring Plan) either expand upon or add detail to SCE's APM PA-1, and for the purposes of the Proposed Project, supersede it.
- D-20 As suggested by the commenter and similar to Responses to Comments D-14, D-17, D-26, D-32, D-36, D-37, and D-38 for other IS/MND sections, the following text has been added to Section 5.6.1 (Geology and Soils, Setting, Regulatory Background) in the Final IS/MND:

Regulatory Background

The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies that protect geology and soil resources in the Proposed Project area.

CPUC General Order 131-D, Section XIV.B 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." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.

D-21 As suggested by the commenter, the following text has been added to Section 5.6.1 (Geology and Soils, Setting, Soils) in the Final IS/MND:

Soils within the Proposed Project area typically reflect the underlying rock type,...

D-22 As suggested by the commenter, the following text has been added to Section 5.6.1 (Geology and Soils, Setting, Slope Stability) in the Final IS/MND:

Important factors that affect the slope stability of an area include the steepness of the slope, the relative strength of the underlying rock material, <u>the geologic structure</u>, and the thickness and cohesion of the overlying colluvium and alluvium.

D-23 As suggested by the commenter, the following text has been revised in Section 5.6.1 (Geology and Soils, Setting, Slope Stability) in the Final IS/MND. See also Response to Comment D-24.

The Proposed Project components traverse flat to relatively flat topography and no known landslides occur in the immediate project vicinity, therefore landslides and other slope failures would not are highly unlikely to occur.

D-24 As suggested by the commenter and similar to Response to Comment D-23, the following text has been revised under Checklist item 5.6.2.a.(iv) in the Final IS/MND. This minor revision is essentially the same impact description as included in the Draft IS/MND, and thus, would not change conclusions of the Final IS/MND with respect to impacts associated with landslides.

No IMPACT. The Proposed Project components are on and traverse flat to relatively flat topography and no known landslides occur in the immediate project vicinity, therefore landslides and other slope failures would not are highly unlikely to occur, thus there would be no impact related to landslides or slope instability.

D-25 As suggested by the commenter, the following text has been corrected under Checklist item 5.6.2.b in the Final IS/MND:

However, Mitigation Measure <u>HYD-1</u> <u>G-2</u> provides for a Stormwater Pollution Prevention Plan (SWPPP), which would be required in accordance with the Clean Water Act. Implementation of Mitigation Measure HYD-1 (Develop Stormwater Pollution Prevention Plan and Implement Best Management Practices) in Section 5.9 (Hydrology and Water Quality) would limit erosion from the construction sites and would result in a less-than-significant impact.

D-26 As suggested by the commenter and similar to Responses to Comments D-14, D-17, D-20, D-32, D-36, D-37, and D-38 for other IS/MND sections, the following text has been added to Section 5.8.1 (Hazards and Hazardous Materials, Setting, Regulatory Background, Local) in the Final IS/MND:

Local

CPUC General Order 131-D, Section XIV.B 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." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.

- D-27 As suggested by the commenter and similar to Responses to Comments D-18, D-19, and D-40, the following footnote has been added to Section 5.8.1 (Hazards and Hazardous Materials, Setting, Applicant Proposed Measures) to clarify that APM HAZ-1 has been superseded by applicable mitigation measures in the IS/MND. See also Response to Comment D-4.
 - SCE's originally proposed APM HAZ-1 is part of the Proposed Project and has been considered in the evaluation of environmental impacts in this IS/MND. The mitigation measures recommended in Section 5.8.2 (Environmental Impacts and Mitigation Measures) and referenced in Section 6 (Mitigation Monitoring Plan) either expand upon or add detail to SCE's APM HAZ-1, and for the purposes of the Proposed Project, supersede it.

- D-28 As suggested by the commenter, the text of Mitigation Measure H-1 (Prepare and Implement Worker Environmental Awareness Program [WEAP]) has been revised as follows in Section 5.8.2 (Environmental Impacts and Mitigation Measures) of the Final IS/MND to reflect its text in Section 1.5 (Environmental Determination) and Section 6 (Mitigation Monitoring Plan) of the Draft IS/MND:
 - MM H-1 Prepare and Implement Worker Environmental Awareness Program (WEAP). SCE shall develop and implement aA project specific WEAP, which shall be prepared and submitted to the CPUC for review and approval prior to construction. The WEAP shall include, at a minimum, the following provisions related to hazards and hazardous materials:
 - A presentation shall be prepared by SCE and used to train all site personnel prior to the commencement of work. A record of all trained personnel shall be kept and provided to the CPUC as requested. Crewmembers who have attended the WEAP training presentation shall be provided with a card or a hard hat sticker indicating that they have completed the WEAP training.
 - Instruction on compliance with Proposed Project mitigation measures, including site-specific biological resources protective measures.
- D-29 As suggested by the commenter, the text under Checklist item 5.8.2.a has been revised as follows to reflect the applicable wood waste requirements for the Proposed Project:

If disposed of, these treated wood poles would be classified as <u>Utility Wood Waste</u> (<u>UWW</u>), which is a category of Treated Wood Waste (TWW) and would be required to be disposed of in a RWQCB approved Treated Wood Waste <u>UWW/TWW</u> Landfill or a Class I hazardous waste landfill.

- D-30 As suggested by the commenter, the following text has been corrected under Checklist item 5.8.2.a in the Final IS/MND:
 - ..., including the proposed Banducci Substation, the proposed 66 kV subtransmission line segments and new structures, the replacement of 39 subtransmission poles, and the installation of the new fiber optic telecommunication cables,...
- D-31 The commenter correctly noted that Figures 5.9-1 and 5.9-2, which represent water resources conditions in the Proposed Project area, are missing from Section 5.9.1 (Setting) in the Draft IS/MND. Figure 5.9-1 (Hydrology and Floodplain Boundaries), which was taken from SCE's Proponent's Environmental Assessment, has been added to the Final IS/MND to show surface water resources. Figure 5.9-2 (Groundwater Resources), also added in the Final IS/MND, shows the boundaries of groundwater basins underlying the Proposed Project area. See also Response to Comment B-1.
- D-32 As suggested by the commenter and similar to Responses to Comments D-14, D-17, D-20, D-26, D-36, D-37, and D-38 for other IS/MND sections, the following text has been added to Section 5.9.1 (Hydrology and Water Quality, Setting, Regulatory Background) in the Final IS/MND:

Regulatory Background

The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies that protect hydrological resources in the Proposed Project area.

CPUC General Order 131-D, Section XIV.B 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." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.

- D-33 As suggested by the commenter, the text of Mitigation Measure HYD-1 (Develop Stormwater Pollution Prevention Plan and Implement Best Management Practices) has been revised as follows in Section 5.9.2 (Environmental Impacts and Mitigation Measures) of the Final IS/MND to reflect its text in Section 1.5 (Environmental Determination) and Section 6 (Mitigation Monitoring Plan) of the Draft IS/MND:
 - MM HYD-1 Develop Stormwater Pollution Prevention Plan and Implement Best Management Practices. The Applicant shall develop a Stormwater Pollution Prevention Plan (SWPPP), as required by the RWQCB and as outlined in General Permit 2009-0009-DWQ,...
 - Ne-Prohibition on overnight parking of mobile equipment within 100 feet of wetlands, culverts, or creeks. Stationary equipment (e.g., pumps, generators) used or stored within 100 feet of wetlands, culverts, or creeks will be positioned over secondary containment.
- D-34 See Response to Comment D-3 regarding consistency revisions to the text of Mitigation Measure HYD-2 (Use Non-potable Water for Dust Control or Soil Compaction) under Checklist item 5.9.2.b in Section 5.9.2 (Environmental Impacts and Mitigation Measures) of the Final IS/MND.
- D-35 This appears to be a duplicate comment. See Response to Comment D-34.
- D-36 As suggested by the commenter and similar to Responses to Comments D-14, D-17, D-20, D-26, D-32, D-37, and D-38 for other IS/MND sections, the following text has been added to Section 5.10.1 (Land Use and Planning, Setting, Regulatory Background) in the Final IS/MND:

Regulatory Background

The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies regarding land use planning in the Proposed Project area.

CPUC General Order 131-D, Section XIV.B 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." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.

As suggested by the commenter and similar to Responses to Comments D-14, D-17, D-20, D-26, D-32, D-36, and D-38 for other IS/MND sections, the following text has been added to Section 5.11.1 (Mineral Resources, Setting, Regulatory Background) in the Final IS/MND:

Regulatory Background

D-37

D-38

The regulatory framework provided in this section identifies federal, State, regional, or local statutes, ordinances, or policies regarding mineral resources in the Proposed Project area.

CPUC General Order 131-D, Section XIV.B 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." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.

As suggested by the commenter and similar to Responses to Comments D-14, D-17, D-20, D-26, D-32, D-36, and D-37 for other IS/MND sections, the text has been modified in Section 5.12.1 (Noise, Setting, Regulatory Background) in the Final IS/MND, as follows. Note that although SCE is exempt from local regulations, noise thresholds that would determine potential impacts and recommended mitigation measures under CEQA would take into consideration local requirements and applicable standards of other agencies (see Checklist item 5.12.2.a).

Regulatory Background

Regulating environmental noise generally is the responsibility of local governments. The U.S. EPA once published guidelines on recommended maximum noise levels to protect public health and welfare (U.S. EPA, 1974), and the State of California maintains recommendations for local jurisdictions in the General Plan Guidelines published by the Governor's Office of Planning and Research (OPR, 2003).

Although regulating environmental noise generally is the responsibility of local governments, CPUC General Order 131-D, Section XIV.B 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." As a public utility project that is subject to the jurisdiction of the CPUC, the Proposed Project is exempt from local regulation and discretionary permits.

The following summarizes the local requirements. Although these standards are provided for informational purposes only, the environmental analysis in Section 5.12.2 (Environmental Impacts and Mitigation Measures) considers local requirements and applicable standards of other agencies when determining potential noise impacts under CEQA.

D-39

As suggested by the commenter, the text under Checklist item 5.17.2.g has been revised as follows to reflect the discussion under Section 5.12.1 (Utilities and Service Systems, Setting, Regulatory Background, Local) about the relationship of local regulations to public utility projects, such as the Proposed Project:

Other solid waste generated during construction of the Proposed Project would be temporarily stored in a designated area of laydown yards and would be reused or disposed in a manner consistent with applicable federal, State, and local statutes and regulations related to solid waste. Therefore, the Proposed Project would comply with federal, State, and local applicable statutes and regulations related to solid waste disposal limits and landfill capacities.

D-40

As suggested by the commenter and similar to Responses to Comments D-18, D-19 and D-27, the following revised text and footnote has been added under Checklist item 5.19.a in Section 5.19 (Mandatory Findings of Significance) to clarify that all of SCE's APMs have been superseded by applicable mitigation measures in the IS/MND. In addition, references to implementation of APMs have been deleted throughout Section 5.19 (Mandatory Findings of Significance) in the Final IS/MND. See also Response to Comment D-4.

However, implementation of the Applicant Proposed Measures BIO-1, BIO-2, BIO-3, BIO-4 and BIO-5 and Mitigation Measures B-1, B-2, B-3, AQ-1, H-1, H-2, and HYD-1 described in Section 5.4.2, which would supersede SCE's Applicant Proposed Measures (APMs) BIO-1, BIO-2, BIO-3, BIO-4 and BIO-5³, would reduce these potential impacts to less than significant levels.

...With implementation of Applicant Proposed Measures PA-1 and Mitigation Measures C-1 through C-7, which would supersede SCE's APM PA-1, the project would not eliminate important examples of major periods of California history or prehistory.

SCE's originally proposed APMs are part of the Proposed Project and have been considered in the evaluation of environmental impacts in this IS/MND. The mitigation measures referenced in Section 1.5 (Environmental Determination), Section 5 (Environmental Analysis and Mitigation), and Section 6 (Mitigation Monitoring Plan) either expand upon or add detail to all of SCE's APMs, and for the purposes of the Proposed Project, supersede them.