SCOPING REPORT Part 1

Southern California Edison's West of Devers Upgrade Project

Riverside and San Bernardino Counties, California

CEQA Lead Agency: California Public Utilities Commission SCH #2014051041



Prepared by:



July 2014

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1. Introduction

This Scoping Report documents the public scoping effort conducted by the California Public Utilities Commission (CPUC) for the West of Devers (WOD) Upgrade Project. Southern California Edison (SCE), the project applicant, has filed an application with the CPUC for a Certificate of Public Convenience and Necessity for approval to construct the WOD project. As part of the project review process and in compliance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), the CPUC and the U.S. Bureau of Land Management (BLM) will prepare a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) that will evaluate the potential environmental impacts of the project.

In compliance with CEQA, the CPUC held a 30-day public scoping period to allow the public and regulatory agencies an opportunity to comment on the scope of the EIR/EIS and to identify issues that should be addressed in the environmental document. This report documents the issues and concerns expressed during the public scoping meetings held in May 2014 and the written comments received from the public, community organizations, and governmental agencies during the May/June 2014 public scoping period.

In compliance with NEPA, the BLM is conducting a separate 30-day public scoping period, which started after publication of the Notice of Intent in the Federal Register on July 1, 2014. A public scoping meeting for the BLM scoping period will be held on July 16, 2014, which will be advertised and noticed similar to the process conducted and described in this scoping report. After the close of the BLM scoping period, Part 2 of this Scoping Report will be published.

1.1 Purpose of Scoping

The process of determining the focus and content of the EIR/EIS is known as scoping. Scoping helps to identify the range of actions, alternatives, environmental effects, and mitigation measures to be analyzed in depth, and eliminates from detailed study those issues that are not pertinent to the final decision on the proposed project. The scoping process is not intended to resolve differences of opinion regarding the proposed project or evaluate its merits. Instead, the process allows all interested parties to express their concerns regarding the proposed project and thereby ensures that all opinions and comments are considered in the environmental analysis. Scoping is an effective way to bring together and address the concerns of the public, affected agencies, and other interested parties. Members of the public, relevant federal, State, regional and local agencies, interests groups, community organizations, and other interested parties may participate in the scoping process by providing comments or recommendations regarding issues to be investigated in the EIR/EIS.

Comments received during the scoping process are part of the public record as documented in this scoping report. The comments and questions received during the public scoping process have been reviewed and considered by the CPUC and BLM and will be used (along with comments received during the second scoping period) in determining the appropriate scope of issues to be addressed in the EIR/EIS and in the selection of alternatives to be carried forward for further analysis.

The purpose of scoping for the WOD project was to:

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- Inform the public and relevant public agencies about the project, CEQA and NEPA requirements, and the environmental impact analysis process;
- Solicit input on the WOD project for evaluation in the EIR/EIS; and
- Update the mailing list of public agencies and individuals interested in future project meetings and notices.

1.2 Summary of the Project

The West of Devers Upgrade Project would be located primarily within the existing West of Devers transmission corridor in the incorporated and unincorporated areas of Riverside and San Bernardino Counties including the Morongo Band of Mission Indians reservation and the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, and Redlands. The West of Devers corridor traverses residential, commercial, agricultural, recreation, and open space land uses.

The WOD project as proposed by SCE includes the following major components:

- Removal and upgrade of existing 220 kV transmission lines primarily within the existing WOD corridor in six segments (see Notice of Preparation figures in Appendix A). The project segments are described as follows:
 - Segment 1: San Bernardino. Two existing 220 kV double-circuit lines include 45 double-circuit towers (average height 136 feet) that would be removed, and installation of 61 towers (average height 135 feet) that would be installed within the existing right-of-way (ROW).
 - Segment 2: Colton and Loma Linda. One existing 220 kV line (average height 139 feet) would be removed and rebuilt, including the removal of 29 double-circuit towers and installation of 35 towers (average height 146 feet).
 - Segment 3: San Timoteo Canyon. Removal of three existing sets of 220 kV towers and construction of two sets of towers, requiring removal of 116 individual towers (average height 86 feet for single-circuit towers and 139 feet for double-circuit towers) and installation of 133 towers (average height 143 feet).
 - Segment 4: Beaumont and Banning. Removal of approximately 175 structures (average height 90 feet for single-circuit towers and 139 feet for double-circuit towers), and installation of approximately 136 towers (average height 142 feet).
 - Segment 5: Morongo Tribal Lands and Vicinity. Six miles of this 9.5-mile segment are on Morongo tribal lands. On the tribal lands, SCE was originally considering two route options, but as of April 7, 2014, the tribe indicated to SCE that it designated Route Option 1 as its preferred route alternative. In this segment, approximately 137 structures would be removed (average height 83 feet for single-circuit towers and 140 feet for double-circuit towers) and approximately 108 structures (average height 144 feet) would be installed. In this segment, three miles of the existing ROW on Morongo land would be abandoned and relocated to the south, near the I-10 Freeway (this route is Option 1).

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- Segment 6: Whitewater and Devers Substation. Removal of approximately 116 structures (average height 83 feet for single-circuit towers and 141 feet for double-circuit towers) and installation of 93 towers (average height 157 feet).
- Substation equipment upgrades at Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations to accommodate increased power transfer on 220 kV lines.
- Subtransmission upgrades would include removal and relocation of 2 miles of existing 66 kV lines and upgrades at Timoteo and Tennessee 66/12 kV Substations to accommodate the relocated 66 kV line.
- Electric **distribution line upgrades** would include removal and relocation of 4 miles of existing 12 kV lines.
- Installation of **telecommunication lines** and equipment for the protection, monitoring, and control of transmission lines and substation equipment.

1.3 Scoping Report Organization

This scoping report includes four main sections and appendices, as described below:

- Section 1 provides an introduction to the report and describes the purpose of scoping and a brief overview of the WOD project considered for analysis in the EIR/EIS.
- Section 2 provides information on the scoping meetings and outreach resources.
- Section 3 summarizes the comments received and issues raised during the scoping comment period.
- Section 4 describes the next steps in the EIR/EIS process.
- Appendices consist of all the supporting materials used during scoping as well as copies of comment letters. The appendices include copies of the Notice of Preparation, meeting materials provided at the public scoping meetings, newspaper advertisements, and a summary of all comments received during this first public scoping process.

2. Project Scoping

This section describes the methods used to notify the public and agencies about the scoping process conducted for WOD. It outlines how information was made available for public and agency review and identifies the different avenues available for providing comments on the project (meetings, fax, email, mail, and phone).

2.1 Notice of Preparation

On May 12, 2014, the CPUC issued a Notice of Preparation (NOP), consistent with CEQA Guidelines §15082, that summarized the proposed project, stated its intention to prepare a joint EIR/EIS, and requested comments from interested parties (see Appendix A). The NOP included information on the date, time, and location of the public scoping meetings. The NOP was made available in English and Spanish.

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The NOP was filed with the California State Clearinghouse on May 12, 2014 (SCH# 2014051041), which began a 30-day public scoping period. The review period for the NOP ended on June 12, 2014.

The CPUC and the BLM distributed NOPS to approximately 13,300 federal, State, regional, and local agencies, and elected officials, community and environmental organizations, Native American groups, and property owners. The mailing included the following approximate distribution:

- 142 agency representatives (includes over 71 different agencies)
- 37 environmental groups/organizations
- 5 tribal government representatives (2 different tribal governments)
- 30 elected officials
- 12,600 property owners within 600 feet of the project route alignment
- 421 other interested parties

Fourteen (14) additional copies of the NOP were delivered to the local project document repository sites. The NOP includes the list of repository sites that were used for this project. All future project-related documents will be available for review at these repository sites (refer to page 7 of the NOP in Appendix A).

2.2 Public Scoping Meetings

The CPUC held four public scoping meetings from May 19 to May 21, 2014. The scoping meetings provided an opportunity for the public, community and interest groups, and government agencies to obtain more information on the project, to learn more about the CEQA and NEPA environmental review processes, to ask questions regarding the project, and to provide comment on the project.

Meeting Locations and Handouts

Table 1 presents the four scoping meetings held for the West of Devers Upgrade Project. Each of the meetings noted below included a court reporter to transcribe all of the oral public comments presented at the public meetings. The transcripts are included in Appendix B of this report. This report includes oral and written comments presented at the public meetings as well as written comments submitted during the scoping comment period.

Handouts and information materials available at each meeting are listed below. Refer to Appendices A and B for copies of these materials.

- Notice of Preparation
- PowerPoint Presentation
- Project Fact Sheet

- Frequently Asked Questions
- Self-addressed Comment Form
- Speaker Registration Card

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Table	1.	Public	Sconing	Meetings
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Date and Time	Location	Signed-in	Speakers	Comment Letters
Monday, May 19, 2014 6:00 pm to 8:00 pm	Banning Banning City Hall – Council Chambers 99 E. Ramsey Street, Banning, CA 92220	8	3	2
Tuesday, May 20, 2014 6:00 pm to 8:00 pm	Loma Linda Loma Linda Civic Center Community Room 25541 Barton Road, Loma Linda, CA 92354	7	3	0
Wednesday, May 21, 2014 3:00 pm to 5:00 pm 7:00 pm to 9:00 pm	Beaumont Beaumont Civic Center Auditorium/Gym 550 E. 6th Street, Beaumont, CA 92223	14 10	3 4	0

Other information was also made available for public review, which included an overview map of the project alignment as well as a series of maps that provided more detailed information of the project segments. Also, at the request of one of the meeting participants, the NOP and the Frequently Asked Questions handout were translated into Spanish; these documents are available on the CPUC's website.

Newspaper Advertisements

The release of the NOP and the date and location of the public scoping meetings were advertised in five newspapers. Advertisements provided a brief synopsis of the proposed project, included a map of the project route, and encouraged attendance at the scoping meetings to share comments on the project. The advertisements were placed in the newspapers listed in Table 2 (also see Appendix B).

Table 2. Newspaper Advertisements				
Publication Language Date				
The Press-Enterprise	English	May 15. 2014		
San Bernardino Sun	English	May 15. 2014		
Redlands Daily Facts	English	May 15. 2014		
The Desert Sun	English	May 15. 2014		
Unidos (La Prensa)	Spanish	May 16. 2014		

Agency and Tribal Government Consultation

During the public scoping period, the CPUC contacted affected public officials and tribal government representatives in an effort to provide information about the proposed project, the EIR/EIS process, and to consult with them regarding potential concerns or issues. Table 3 provides a list of all agencies that were contacted via telephone and/or email by the CPUC.

Table 3. Agencies and Tribal Government Contacted Via Phone and Email			
Agency / Tribal Government	Contact Name	Contact Position	Project Segment
City of Colton	Mark Tomich Mario Suarez	Director of Development Services Senior Planner	2
City of Grand Terrace	Kenneth Henderson	Interim City Manager	2
City of Loma Linda	T. Jarb Thaipejr Konrad Bolowich	Public Works Director and City Manager Community Development Director and Assistant City Manager	1
City of Redlands	N. Enrique Martinez Fred Mousavipour	City Manager Municipal Utilities & Engineering Director	1, 3

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Table 3. A	Agencies and	Tribal Govern	nment Contact	ed Via Phon	e and Fmail
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Agency / Tribal Government	Contact Name	Contact Position	Project Segment
City of Beaumont	Alan Kapanicas Rebecca Deming	City Manager Director of Planning	4
City of Banning	Andy Takata Duane Burk	City Manager Director of Public Works	4, 5
City of Calimesa	Mr. Randy Anstine Mr. Bob French	City Manager Director of Public Works	3, 4
County of Riverside	Mr. Juan Perez Karlene Hernandez	Director of Transportation and Land Management Executive Assistant	3, 4, 5, 6
County of San Bernardino	Gerry Newcombe	Director, Department of Public Works	1, 2, 3
Morongo Band of Mission Indians	Roger Meyer Robert Martin	CEO Chairman	5

As a result of this initial consultation, two local agencies and representatives of the Morongo Band of Mission Indians expressed interest in a face-to-face meeting with the CPUC and its environmental consultants to learn more about the WOD project. The CPUC held the following meetings:

- May 20, 2014 Roger Meyer, CEO, Morongo Band of Mission Indians
- May 20, 2014 Don Young, Engineering Manager, City of Redlands
- May 21, 2014 Kenneth Henderson, Interim City Manager, City of Grand Terrance

During the meetings, the CPUC presented the proposed project to the agencies, answered questions, and solicited informal input on any issues and concerns with the project. The CPUC also provided a project factsheet and identified additional information that the agencies needed regarding the project. This information was provided after the meetings by email and mail to the requesting agencies/tribal government.

2.3 Outreach

The CPUC and BLM provided opportunities for the public and agencies to ask questions or comment on the project outside of meetings. A project information hotline, email address, and website were established and available during the public comment period. Information on these additional outreach efforts are described below.

Project Information Hotline

To offer another opportunity to inquire about the public scoping meetings or the proposed project, a project-specific phone line (888-456-0254) was established to answer questions and take verbal comments from those unable to attend the meetings. Telephone messages were retrieved and all calls were promptly addressed. The phone line also allowed for comments to be submitted in writing by fax instead of mail. Only inquiries (questions) were provided through the phone line; no comments were received through this phone line (voice or fax) regarding the scope of the EIR/EIS.

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Email Address

An email address (<u>westofdevers@aspeneg.com</u>) was established for the project to provide another means of submitting comments on the scope and content of the EIR/EIS. The email address was provided on meeting handouts and posted on the website. Comments received by email have been considered and incorporated into this report.

Internet Website

The CPUC established a project-specific website established to provide ongoing information about the proposed project. During the scoping period, the website included electronic versions of the project application, NOP, and project-related maps. The website provided, and will continue to provide throughout the project, another public venue to learn about the project. The website will remain a public information resource for the project and will announce future public meetings and hearings. The website address is:

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

Distribution List/Database

The CPUC and BLM have compiled a comprehensive project-specific mailing list with over 13,300 entries. The mailing list/database was updated after the scoping meetings and the scoping comment period; the mailing list was reviewed to confirm all meeting attendees and all individuals, organizations, and agencies that submitted written comments were on the list. This mailing list will continue to be used throughout the environmental review process for the project to distribute public notices and will continue to be updated to ensure all interested parties are notified of key project milestones.

3. Scoping Comments

This section summarizes the key issues raised during the public comment period. A total of 23 written comment letters were submitted and 13 individuals presented oral comments during the public scoping meetings. Appendix C of this report includes a summary of all comments received on the WOD project including the oral comments presented at the public scoping meetings (see transcripts in Appendix B). Appendix D includes copies of the written comment letters submitted on the project. The key issues raised are discussed below.

Aesthetics/Visual

Several commenters expressed concern with the height of the new towers and stated that the added bulk and higher towers would be highly visible from residences and public roadways. A number of commenters also suggested that the lines be undergrounded in certain areas to address visual impacts as well as safety impacts. Visual simulations were requested as part of the aesthetics assessment.

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Conflicts with Existing Land Uses

Some of the cities noted that the WOD project could impact their existing plans for development and could impact anticipated road improvement projects.

The project bisects the Colorado River Aqueduct, and thus, there was some concern that the project could impact the ongoing operation, maintenance, and repair of the aqueduct. The Metropolitan Water District requested that design plans be reviewed and approved by them and that the EIR/EIS consider potential impacts to the aqueduct.

The City of Colton expressed concern that the project would impede residential development in the Reche Canyon area by creating a physical barrier and requiring greater setbacks.

The project's potential to impact recreational uses in the Cities of Colton and Grand Terrace were identified as key concerns that should be evaluated in the EIR/EIS. The connectivity of recreational areas between the two cities was an issue that was identified and that the cities requested be evaluated in the EIR/EIS.

One commenter requested that existing land uses within the utility corridor be allowed to continue. In particular an RV storage area that has been in operation for over 10 years.

Several commenters raised a concern with the placement of the towers closer to existing homes and wanted to know why SCE could not place the towers further away from existing residences. Commenters also expressed concern with the use of the easements; one commenter mentioned that his homeowner's group wanted to improve the easement so that they could use it for recreational and other uses but SCE would not allow it.

Property Values

Commenters expressed concern with the project's impact on property values because of towers being moved closer to homes and businesses and the impact of bulkier, taller towers.

Fire Risk, EMF, and other Hazards

Several commenters expressed concern with the potential of the project to increase fire risk and suggested the requirement for mitigation measures such as an emergency response plan and undergrounding of the transmission line.

Southern California Gas noted that the project crosses a number of their pipelines and suggested that SCE contact Underground Service Alert prior to excavating in the project area.

Several concerns were raised regarding the use of the transmission corridor easement and whether or not it was safe for recreational or other uses. One homeowner stated that his children played in the transmission corridor and he was concerned with their safety and wanted to know who was responsible if someone was hurt.

Construction-Related (Dust, Noise, Traffic)

Commenters expressed concern with construction dust especially in high wind areas and requested that dust suppression measures be included in the EIR/EIS.

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Local agencies also asked about where or not SCE would be required to abide by local requirements with regard to construction hours and noise standards. Short and long-term noise impacts should be addressed.

Some of the cities were concerned with traffic on local roads and the potential for damaging local roads and increasing traffic. More information was requested on anticipated truck routes on the different project segments, and a request for requiring SCE to coordinate with local agencies on the construction schedule as well as requiring SCE to repair any damage to local roads.

Several commenters requested that the EIR/EIS consider the impact of road closures and limited access to residences, residential streets, and businesses.

Geology/Slope Stability

In the City of Grand Terrace, the Cities of Colton and Grand Terrace expressed concern regarding towers that are currently on unstable soil and near an area that resulted in a deck collapsing from slope failure. Slope stability and erosion should be addressed.

Biological Resources Issues

One of the main issues presented regarding biological resources was the need for the EIR/EIS to evaluate the project's consistency with the two Multiple-Species Habitat Conservation Plans that are in effect in the project area.

Another request was to assess potential impacts to California gnatcatcher and its habitat in Segment 2 and a request to identify mitigation for habitat impacts.

Other Comments (Curtailment and Other)

Five written comment letters (representing nine energy companies) and one commenter at the public scoping meeting addressed concern with curtailment of existing renewable energy production. These commenters expressed concern with SCE curtailing or reducing existing electrical generation for several years while the WOD project is being constructed. They felt it was unfair for them to have to reduce or stop generation in order to allow new generators to enter the system. The letters also stated that the project was not being proposed to stabilize the system but to allow new generators to interconnect to the electrical system. Other requests include limiting the amount of time for curtailment, requiring construction only during low generation periods (Oct-Feb), and requiring that one line be brought up as soon as possible to carry the load of existing lines. They requested compensation for this anticipated curtailment period and requested that this issue be discussed in the EIR/EIS.

One commenter expressed concern with "piecemealing" and stated that the WOD project alignment is one of the alternatives (Northerly Route) identified and rejected in the evaluation of the El Casco Substation EIR.

Cumulative Projects

During agency and tribal government consultation meetings, a number of cumulative projects were identified that will be considered in the EIR/EIS. These projects include:

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- Seminole Drive extension, south of Interstate 10
- Interstate 10 bypass, Banning to Cabazon project
- Gateway Center Warehouse (Cherry Valley)
- Outdoor Amphitheater (on Morongo lands)
- Mountain View Avenue Widening Project (Inland Valley Development Agency)
- City of Redlands citywide paving program
- Water project (Inland Valley Development Agency part of Norton Air Force Base reuse)
- City of Redlands Alabama Street widening and relocation of electrical poles
- Redlands Passenger Rail (Alabama Street; San Bernardino Association of Governments)
- Citrus Plaza, Phase II

Alternatives

On tribal lands, the Morongo tribe has voted on the preferred route within their lands and stated that the EIR/EIS did not need to consider other alternative routes within their lands.

Alternatives suggested during the public scoping period include:

- Move route to the El Casco route (which merges with Morongo line but does not affect homes)
- Place the line underground
- Move towers 200 feet on the north side of the hill, away from homes

4. Next Steps in EIR/EIS Process

While scoping is the initial step in the environmental review process, additional opportunities to comment on the WOD EIR/EIS will be provided. The CPUC and BLM will provide for additional public input when the NOI is released, when the Draft EIR/EIS is released, and during public meetings for the Draft EIR/EIS. Table 4 presents a proposed schedule for the EIR/EIS, and identifies where in the process the public and agencies can provide additional input in the environmental review process.

Table 4. EIR/EIS Schedule				
Event/Document		Purpose	Approximate Date	
Completed Events & Doo	cuments			
CPUC Scoping Notice of Preparation	Release of NOP	Notified interested parties and agencies of the CPUC's intent to prepare an EIR.	May 2014	
	Public scoping period	Held 30-day public scoping period on the proposed project to provide for public comments on the scope of the EIR/EIS.	May 12 to June 12, 2014	
CPUC Scoping Meetings	Held 4 scoping meetings	Presented information on the WOD project and provided opportunity for public and agency comments in a public forum.	May 19, 20, and 21, 2014	
Scoping Report, Part 1		Documents public and agency comments on the WOD project and environmental issues of concern to the public and agencies.	July 2014	

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Table 4. EIR/EIS Sch	edule		
Event/Document		Purpose	Approximate Date
Upcoming Events & Do	cuments		
BLM Scoping Notice of Intent	Release of NOI	Notifies federal agencies and interested parties of the BLM and CPUC's intent to prepare an EIR/EIS.	July 2014
	Public scoping period	A second public scoping period will be provided.	July 2014
BLM Scoping Meeting	Will hold one scoping meeting	One additional scoping meeting will be conducted approximately two weeks after publication of the NOI in the Federal Register.	July 2014
Scoping Report, Part 2		Documents public and agency comments made during the BLM scooping period.	August 2014
Draft EIR/EIS	Release of Draft EIR/EIS	Presents impacts and mitigation for the WOD project and its alternatives.	Fall/Winter 2014
	Public Review Period	Minimum 45-day public review period on the Draft EIR/EIS.	Fall/Winter 2014
	Draft EIR/EIS public meetings	Allows for public comment on Draft EIR/EIS in a public venue.	Fall/Winter 2014
Final EIR/EIS	Release of Final EIR/EIS	Final EIR/EIS, with response to comments, issued by the CPUC and BLM.	Early 2015
Decisions on Project		Commission certifies EIR and issues a Proposed Decision for public review. Full Commission votes and a Decision is published.	Spring 2015
		BLM issues Record of Decision.	Spring 2015

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Appendix A

Notice of Preparation

Appendix A-1

Notice of Preparation – English



Notice of Preparation

for a Joint
Environmental Impact Report/
Environmental Impact Statement
for the

West of Devers Upgrade Project

Proposed by Southern California Edison Application No. A.13-10-020

A. Introduction

Southern California Edison (SCE) has filed an application for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the proposed West of Devers Upgrade Project, also referred to as the Proposed Project. The CPUC and the United States Department of Interior, Bureau of Land Management (BLM) will direct the preparation of a joint Environmental Impact Report (EIR) and an Environmental Impact Statement (EIS) referred to as an EIR/EIS for the Proposed Project. The CPUC as the lead agency under California law, and the BLM, as the federal lead agency will prepare a Draft and Final EIR/EIS to comply with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

As required by CEQA, this CPUC Notice of Preparation (NOP) is being sent to interested agencies and members of the public. The purpose of the NOP is to inform recipients that the CPUC is beginning preparation of an EIR/EIS for the Proposed Project and to solicit information that will be helpful in the environmental review process. This notice includes a description of the project that SCE proposes to construct, a summary of potential project impacts, the times and locations of public scoping meetings, and information on how to provide comments. Four public meetings will be held during the CPUC scoping period (see detail in Section E). The CPUC's scoping period will end on June 12, 2012.

As required by NEPA, the BLM will publish in the Federal Register a Notice of Intent (NOI) to prepare a joint EIR/EIS for the Proposed Project. Similar to this CPUC NOP, the intent of the NOI will be to initiate the public scoping for the EIR/EIS, provide information about the Proposed Project, and also serve as an invitation for other cooperating agencies to provide comments on the scope and content of the EIR/EIS. In the NOI, the BLM will set an additional comment period, and an additional public meeting will be held by the BLM, most likely in June 2014.

A Scoping Report will be prepared to summarize comments made to both agencies. This CPUC NOP, the BLM NOI (after its publication in the Federal Register) and the Scoping Report can be viewed on the project web site at the following link:

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

B. Project Description

As illustrated on **Figure 1** (Project Overview; attached to this NOP), the Proposed Project would be located primarily within the existing West of Devers transmission corridor in the incorporated and unincorporated areas of Riverside and San Bernardino Counties including the Morongo Band of Mission Indians reservation and the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, and Redlands. The West of Devers corridor traverses residential, commercial, agricultural, recreation, and open space land uses.

The West of Devers (WOD) Upgrade Project as proposed by SCE includes the following major components:

- Removal and upgrade of existing 220 kV transmission lines primarily within the existing WOD corridor in six segments, illustrated in Figures 2a, 2b, and 2c at the end of this NOP. Figures 3a through 3f illustrate the cross-section view of each segment, showing the current view of existing towers and the proposed reconfiguration. The project segments are described as follows:
 - Segment 1: San Bernardino. Two existing 220 kV double-circuit lines include 45 double-circuit towers (average height 136 feet) that would be removed, and installation of 61 towers (average height 135 feet) that would be installed within the existing right-of-way (ROW).
 - Segment 2: Colton and Loma Linda. One existing 220 kV line (average height 139 feet) would be removed and rebuilt, including the removal of 29 double-circuit towers and installation of 35 towers (average height 146 feet).
 - .Segment 3: San Timoteo Canyon. Removal of three existing sets of 220 kV towers and construction
 of two sets of towers, requiring removal of 116 individual towers (average height 86 feet for singlecircuit towers and 139 feet for double-circuit towers) and installation of 133 towers (average
 height 143 feet).
 - Segment 4: Beaumont and Banning. Removal of approximately 175 structures (average height 90 feet for single-circuit towers and 139 feet for double-circuit towers), and installation of approximately 136 towers (average height 142 feet).
 - Segment 5: Morongo Tribal Lands and Vicinity. Six miles of this 9.5-mile segment are on Morongo tribal lands. On the tribal lands, SCE was originally considering two route options, but as of April 7, 2014, the tribe indicated to SCE that it designated Route Option 1 as its preferred route alternative. In this segment, approximately 137 structures would be removed (average height 83 feet for single-circuit towers and 140 feet for double-circuit towers) and approximately 108 structures (average height 144 feet) would be installed. In this segment, three miles of the existing ROW on Morongo land would be abandoned and relocated to the south, near the I-10 Freeway (this route is Option 1).
 - Segment 6: Whitewater and Devers Substation. Removal of approximately 116 structures (average height 83 feet for single-circuit towers and 141 feet for double-circuit towers) and installation of 93 towers (average height 157 feet).
- Substation equipment upgrades at Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations to accommodate increased power transfer on 220 kV lines.
- Subtransmission upgrades would include removal and relocation of 2 miles of existing 66 kV lines and upgrades at Timoteo and Tennessee 66/12 kV Substations to accommodate the relocated 66 kV line.
- Electric distribution line upgrades would include removal and relocation of 4 miles of existing 12 kV lines.
- **Installation of telecommunication lines** and equipment for the protection, monitoring, and control of transmission lines and substation equipment.

Project Purpose. According to SCE, the Proposed Project is needed for six primary reasons:

- 1. To integrate and interconnect generation resources within the Blythe and Desert Center areas.
- 2. To comply with executed Large Generator Interconnection Agreements (LGIAs) for the Blythe and Desert Center areas and enable full deliverability of any solar projects in these two areas.
- 3. To support integration of new generation in the Blythe and Desert Center areas with executed Power Purchase Agreements (PPAs).
- 4. To facilitate integration of renewable generation resources being developed in the Coachella Valley area.

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- 5. To comply with Reliability Standards and the Regional Business Practice developed by the North American Electric Reliability Council, Western Electricity Coordinating Council, California Independent System Operator, and the individual utility.
- 6. To help facilitate progress towards California's Renewable Portfolio Standard (RPS) goals.

In addition, SCE has presented the following six objectives in its Proponent's Environmental Assessment (PEA):

- Allow SCE to meet its obligation to integrate and fully deliver the output of new generation projects located in the Blythe and Desert Center areas that have requested to interconnect to the electrical transmission grid.
- 2. Consistent with prudent transmission planning, maximize the use of existing transmission line rights-of-way to the extent practicable.
- 3. Meet project need while minimizing environmental impacts.
- 4. Facilitate progress toward achieving California's RPS goals in a timely and cost-effective manner by SCE and other California utilities.
- 5. Comply with applicable Reliability Standards and Regional Business Practice developed by NERC, WECC, and the CAISO; and design and construct the project in conformance with SCE's approved engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects.
- 6. Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable.

The objectives presented by SCE will guide the development of alternatives to the West of Devers Upgrade Project, but because CEQA does not require that alternatives meet all objectives, these objectives do not unreasonably constrain the alternatives development process.

C. Project Background

C.1 Prior CPUC Applications Related to West of Devers

SCE originally filed an application (A.05-04-015) with the CPUC for a CPCN to construct the Devers–Palo Verde No. 2 (DPV2) on April 11, 2005. The project included three major components:

- A 500 kV line from the Palo Verde area in Arizona to a new substation near Blythe, California;
- A 500 kV line from the Blythe area substation to the Devers Substation; and
- Upgrades to SCE's lower voltage transmission system west of the Devers Substation.

The CPUC approved the DPV2 Project in January 2007 in Decision D.07-01-040. The approved project included the SCE proposal but did not include the West of Devers segment; this segment could not be approved because at the time of agency decisions (January 2007), the Morongo Band of Mission Indians had not reached an agreement with SCE in regards to terms of the right-of-way (ROW) renewal for most of the 6 miles of the corridor that crosses tribal land. Therefore, the CPUC approved construction of a new 500 kV transmission line connecting the Devers Substation and the Valley Substation. Construction of the approved DPV2 Project, including the Devers-Valley line, has now been completed.

C.2 Memorandum of Agreement with the Morongo Band of Mission Indians

In 2013, SCE and the Morongo Band reached an agreement on the terms for ROW renewal for the corridor on Morongo tribal land. This agreement grants SCE four new easements and rights-of-way allowing

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SCE's continued use, operation, maintenance, inspection, and upgrade and access of existing facilities, in return for appropriate compensation for the continued use of the reservation lands for Existing Facilities and Future Facilities. In addition, the Morongo Band agreed to allow a corridor for the construction, use, operation, maintenance, inspection, upgrade and access of SCE's Future Facilities, including either two double-circuit 220 kV transmission lines or four single-circuit 220 kV transmission lines where engineering constraints require single-circuit lines.

C.3 Current West of Devers Upgrade Project

After reaching an agreement with the Morongo Band, SCE filed a CPCN application for the West of Devers Upgrade Project with the CPUC and filed a Plan of Development with the BLM. On October 25, 2013, SCE filed an application and PEA for the Proposed Project. Since this filing, the CPUC has conducted a 30-day completeness/deficiency review. Based on this review, the CPUC sent a deficiency letter to SCE on November 25, 2013, indicating that the PEA is incomplete. SCE submitted information in response to the deficiency letter in several parts between mid-December 2013 and late January 2014.

SCE has stated that the remaining outstanding information that was identified in the CPUC's deficiency letter (dated November 25, 2013) will be submitted by the end of June 2014. Therefore, the CPUC sent a second deficiency letter on February 18, 2014 stating that the PEA is still considered incomplete. However, while SCE is assembling the remaining data required for preparation of a complete and adequate Draft EIR/EIS, the Energy Division has decided that it can move forward with issuance of this Notice of Preparation, scoping and agency consultation, and preparation and agency review of an initial internal Administrative Draft EIR/EIS.

D. Analysis of Potential Environmental Effects

In accordance with CEQA and NEPA guidelines, the CPUC and BLM intend to prepare a joint EIR/EIS to evaluate potential environmental effects of the Proposed Project, and to propose mitigation measures to reduce any significant effects identified. The EIR/EIS will also study the environmental impacts of the alternatives to the Proposed Project, and propose mitigation to reduce these effects.

Based on preliminary analysis of the Proposed Project and review of documents submitted by SCE and other parties to the CPUC's CPCN proceeding, completion of the Proposed Project may have a number of potentially significant environmental effects. Potential issues and impacts to the existing environment include those listed in Attachment A. No determinations have yet been made as to the significance of these potential impacts; such determinations will be made in the environmental analysis conducted in the EIR/EIS after the issues are considered thoroughly. In addition to analysis of the issues listed in Attachment A and other issues raised in the scoping process, the EIR/EIS will evaluate the cumulative impacts of the project in combination with other present and planned projects in the area.

Mitigation Measures. SCE has proposed measures that could reduce or eliminate potential impacts of the Proposed Project. The effectiveness of these measures (called "applicant proposed measures") will be evaluated in the EIR/EIS, and additional measures ("mitigation measures") will be developed to further reduce impacts, if required. When the CPUC and BLM make their final decision on the Proposed Project, they will define the mitigation measures to be adopted as a condition of project approval, and the CPUC will require implementation of a mitigation monitoring program.

Alternatives. In addition to mitigation measures, the EIR/EIS will evaluate alternatives to the Proposed Project that could potentially reduce, eliminate, or avoid impacts of the Proposed Project. Alternatives may include minor reroutes and different structure designs within the ROW, different routes for the transmission lines (in other corridors), and new transmission and substation facilities and/or equipment

that could meet the electric system need and Proposed Project objectives. In compliance with CEQA and NEPA, a Draft EIR/EIS must describe a reasonable range of alternatives to the project or project location that could meet the project's purpose and need, feasibly attain most of the basic project objectives, and avoid or lessen any of the significant environmental impacts of the Proposed Project. Additionally the No Project/No Action Alternative must also be analyzed in the Draft EIR/EIS. The No Project/No Action Alternative will describe the situation that would likely occur in the absence of Proposed Project implementation. Further, the EIR/EIS must evaluate the comparative merits of the alternatives.

In the PEA for WOD, SCE evaluated a variety of project alternatives that may be able to achieve the same objectives as the Proposed Project, including alternative routes, alternative transmission projects, and non-transmission alternatives, which are briefly described below. As part of the environmental review process for the Proposed Project, the CPUC and BLM will evaluate the feasibility of the alternatives presented by SCE in its PEA and consider whether or not they meet CEQA and NEPA requirements. In addition, the CPUC and BLM will likely develop other alternatives for evaluation in the EIR/EIS. New alternatives developed during the environmental review process for the Proposed Project could potentially be based on the input received during the scoping process and the impacts identified during analysis.

E. Public Scoping Meetings

The CPUC will initially conduct four public Scoping Meetings in three locations in the project area, as shown in Table 1. The purpose of the scoping meetings is to present information about the Proposed Project and the CPUC and BLM's decision-making processes, and to listen to the views of the public on the range of issues relevant to the scope and content of the EIR/EIS.

Table 1. Public Scoping Meetings				
Location	Banning, CA	Loma Linda, CA	Beaumont, CA	
Day & Date	Monday May 19, 2014	Tuesday May 20, 2014	Wednesday May 21, 2014	
Time(s)	6:00 to 8:00 p.m.	6:00 to 8:00 p.m.	3:00 to 5:00 p.m. <u>and</u> 7:00 to 9:00 p.m.	
Address	Banning City Hall Council Chambers 99 E. Ramsey Street Banning, CA 92220	Loma Linda Civic Center Community Room 25541 Barton Road Loma Linda, CA 92354	Beaumont Civic Center Auditorium/Gym 550 E. 6th Street Beaumont, CA 92223	

F. Scoping Comments

CPUC Scoping for CEQA: At this time, the CPUC is soliciting information regarding the topics and alternatives that should be included in the EIR/EIS. Suggestions for submitting scoping comments are presented at the end of this section. **All comments for the CPUC's CEQA scoping period must be received by June 12, 2014.**

BLM Scoping for NEPA: BLM staff will participate in the scoping meetings listed in Table 1 above. However, after publication of the Notice of Intent in the Federal Register, BLM will schedule an additional scoping meeting in the project area. This meeting will be advertised in local newspapers and on the BLM and CPUC websites. **The publication of the NOI will start a 30-day public scoping period in accordance with NEPA during which additional comments on the scope and content of the EIR/EIS can be provided.**

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All Scoping Comments: You may submit comments in a variety of ways: (1) by U.S. mail, (2) by electronic mail, (3) by fax, or (4) by attending a Public Scoping Meeting (see times and locations in Table 1 above) and making a verbal statement or handing in a written comment at the scoping meetings.

Individual respondents may request confidentiality. If you wish to withhold your name or street address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comment. Such requests will be honored to the extent allowed by law. The CPUC and BLM will not consider anonymous comments. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

By Mail: If you send comments by U.S. mail, please use first-class mail and be sure to include your name and a return address. Please send written comments on the scope and content of the EIR/EIS to:

Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager) California Public Utilities Commission & Bureau of Land Management c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002 Fax and Voicemail: (888) 456-0254

By Electronic Mail: Email communications are welcome; however, please remember to include your name and return address in the email message. Email messages should be sent to <u>westofdevers@aspeneg.com</u>.

By Fax: You may fax your comment letter to our information line at (888) 456-0254. Please remember to include your name and return address in the fax, to write legibly, and use black or blue ink.

A **Scoping Report** will be prepared, summarizing all comments received (including oral comments made at the Scoping Meetings). This report will be posted on the project website at: http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm, and copies will be placed in local document repository sites listed in Table 2 below. In addition, a limited number of copies will be available from the CPUC upon request.

Suggestions for Effective Participation in Scoping

Following are some suggestions for preparing and providing the most useful information for the EIR/EIS scoping process.

- 1. Review the description of the project (see Section C of this Notice of Preparation and the maps provided). Additional detail on the project description is available on the project website where SCE's Proponent's Environmental Assessment may be viewed.
- 2. Attend the scoping meetings to get more information on the project and the environmental review process (see times and dates above).
- 3. Submit written comments or attend the scoping meetings and make oral comments. Explain important issues that the EIR/EIS should cover.
- 4. Suggest mitigation measures that could reduce the potential impacts associated with SCE's Proposed Project.
- 5. Suggest alternatives to SCE's Proposed Project that could avoid or reduce the impacts of the Proposed Project.

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G. For Additional Project Information

Internet Website – Information about this application and the environmental review process will be posted on the Internet at http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm. This site will be used to post all public documents during the environmental review process and to announce upcoming public meetings. In addition, a copy of SCE's PEA may be found at this site, and the Draft EIR/EIS will be posted at the site after it is published.

Project Information Hotline – You may request project information by leaving a voice message at (888) 456-0254 or sending a fax, using the same telephone number.

Document Repositories – Documents related to the WOD Project and the EIR/EIS will be made available at the sites listed in Table 2.

Table 2. Project Document	Repository Sites	
West of Devers – Library Sites		
City of Riverside Library	3581 Mission Inn Avenue, Riverside, CA 92501	(951) 826-5201
San Bernardino County Library	104 W. Fourth Street, San Bernardino, CA 92415	(909) 387-5723
Colton Public Library	656 N. Ninth Street, Colton, CA 92324	(909) 370-5083
Grand Terrace Library	22795 Barton Road, Grand Terrace, CA 92313	(909) 783-0147
City of Loma Linda Library	25581 Barton Road, Loma Linda, CA 92354	(909) 796-8621
A.K. Smiley Public Library	125 West Vine Street, Redlands, CA 92373	(909) 798-7565
Mentone County Library	1870 Mentone Boulevard, Mentone, CA 92359	(909) 794-2657
Yucaipa Branch Library	12040 5th Street, Yucaipa, CA 92399	(909) 790-3146
Calimesa City Library	974 Calimesa Boulevard, Calimesa, CA 92320	(909) 795-9807
Beaumont Library District	125 East 8th Street, Beaumont, CA 92223	(951) 845-1357
Banning Public Library	21 W Nicolet Street, Banning, CA 92220	(951) 849-3192
Morongo Community Library	11581 Potrero Road, Banning, CA 92220	(951) 849-5937
West of Devers – U.S Bureau of	Land Management Office	
Palm Springs/So. Coast Field Ofc	1201 Bird Center Drive, Palm Springs, CA 92262	(760) 833-7100
California Desert District Office	22835 Calle San Juan Del Los Lagos, Moreno Valley, CA 92553	(951) 697-5200

^{*}Copies of material from these documents may be made at these locations at the requester's expense.

H. Issuance of NOP

The California Public Utilities Commission hereby issues this Notice of Preparation of an Environmental Impact Report.

Date: May 5, 2014

Billie Blanchard, Project Manager

Energy Division

California Public Utilities Commission

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Environmental Issue Area / Potential Issues or Impacts

AESTHETICS / VISUAL

- Visual impacts would occur to sensitive viewpoints from which the proposed transmission line would be visible, including: residences, park and recreation areas, open space areas, cemeteries, and travel routes and highways.
- Short-term visual impacts from project construction.
- Long-term visual impacts to residents along the WOD corridor from the increased height and new locations of the proposed towers as compared to the current towers.
- Potential visual impacts of short duration to traveling viewers located where the proposed transmission line crosses or runs parallel to roadways, such as I-10 and CA 62.

AGRICULTURAL RESOURCES

- Temporary impacts would occur during the construction phase from the removal of cropland from production and interference with agricultural activities (including tilling and irrigation, restricted access to agricultural areas, and/or potential conflict with crop dusters).
- Project would potentially convert farmland to non-agricultural use. Long-term impacts would occur
 where transmission line foundations would permanently remove active agricultural land from production
 and interfere with agricultural operations (including tilling and irrigation patterns).
- There would be potential impacts related to zoning for agricultural use.

AIR QUALITY AND GREENHOUSE GAS

- Impacts during construction would occur as a result of airborne dust and heavy equipment, helicopters, support vehicles, and other equipment powered by internal combustion engines that generate exhaust containing: carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NOx), sulfur oxides (SOx), particulate matter (PM10 and PM2.5), and greenhouse gas emissions.
- Potential ongoing impacts from emissions and fugitive dust produced during operation and maintenance of the proposed transmission lines.
- Potential impacts to human and environmental health by contributing to existing non-attainment conditions with respect to the EPA's National Ambient Air Quality Standards (NAAQS) and California standards for particulate matter and ozone.
- Total emissions generated from construction activities would exceed the South Coast Air Quality Management District (SCAQMD) recommended thresholds of significance.
- Project implementation may conflict with an applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions.

BIOLOGICAL RESOURCES - VEGETATION

- Potential temporary and permanent impacts to sensitive vegetation communities from removal of existing lines and construction of new lines.
- Impacts from an increase in non-native weed establishment and recruitment, particularly at tower sites, crane pads, material stockpile yards, and concrete batch plant sites.
- Potential temporary and permanent impacts to sensitive plant species, including Coachella Valley milkvetch and Nevin's barberry.
- Potential temporary and permanent impacts to federal or state jurisdictional wetland or non-wetland drainages through vegetation removal, placement of fill, erosion, sedimentation, and degradation of water quality.

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Environmental Issue Area / Potential Issues or Impacts

BIOLOGICAL RESOURCES – WILDLIFE

- Potential direct, permanent impacts to wildlife, which may be accidentally run over by vehicles during construction.
- Potential direct and indirect impacts to reptile species listed in the California Natural Diversity Database (CNDDB), including Coachella Valley fringe-toed lizard.
- Potential direct and indirect, temporary and permanent impacts to the following sensitive wildlife species: desert tortoise, coastal California gnatcatcher, Least Bell's vireo, southwestern willow flycatcher, western yellow-billed cuckoo, Stephens' kangaroo rat, and desert kit fox.
- Potential direct, permanent impacts to burrowing rodents, which may be inadvertently killed when burrows are collapsed by heavy machinery.
- Potential direct and indirect impacts to bird species listed in the CNDDB, including: burrowing owl, golden eagle, and peregrine falcon.
- Potential ongoing impacts to bird and bat species, which may collide with conductors or static lines during flight.

Nesting Birds

- Potential direct, permanent impacts to birds nesting in structures, equipment, cacti, shrubs, trees, or on the ground, if their nests are disturbed or destroyed.
- Potential impacts to nesting bird species from helicopter rotor wash, noise, dust, and vibrations.

CULTURAL RESOURCES

Archaeological Sites

Potential impacts to known and unknown archaeological sites during construction.

Traditional Cultural Properties

- Potential impacts to Traditional Cultural Properties (TCPs) or potential TCPs from the construction, operations, and maintenance of the proposed transmission line.
- Potential ethnographic impacts where the WOD corridor (220 kV Upgrade) crosses the Morongo Band of Mission Indians Reservation.

Historical Sites

• Potential impacts to historic-era sites that are potentially eligible for listing on the NRHP.

Paleontological Resources

Potential impacts to paleontological resources between Devers and Vista Substations, where the west of Devers corridor (220 kV Upgrade) would traverse 26 miles of high or undetermined areas of paleontological sensitivity, including: Pleistocene older alluvium, Canebrake Conglomerate or Palm Springs Formation, and San Timoteo Formation.

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Environmental Issue Area / Potential Issues or Impacts

GEOLOGY AND SOILS

- Potential impacts from grading access roads, spur roads, and tower pads within the utility ROW.
- Potential impacts from localized soil erosion on low fill slopes and steeply graded areas.
- Potential impacts from seismic activity from five fault zones in the project area. The towers along the alignment in this area would be subject to severe seismic shaking within the lifetime of the Proposed Project.
- Possible impacts from ground surface rupture where the proposed transmission line would cross active fault lines.
- Possible impacts from landslides, mudslides, or other related ground failures from seismic activity, particularly where the proposed transmission line would cross active fault lines.

HAZARDS AND HAZARDOUS MATERIALS

- Potential impacts from the improper storage or handling or hazardous materials and/or hazardous wastes during project construction, operations, or maintenance.
- Potential impacts from the leaking or spilling of petroleum or hydraulic fluids from construction equipment or other vehicles during project construction, operation, or maintenance.
- Potential impacts from the inadvertent uncovering of hazardous materials during excavation activities, causing toxic releases to the environment.

HYDROLOGY AND WATER QUALITY

- Possible impacts from increased surface water runoff, erosion, siltation, and sedimentation.
- Possible impacts to streams or washes from violation of water quality standards or waste discharge requirements.

LAND USE

- Possible conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.
- Effects on to landowners, businesses, and public and community facilities in the Cities of Banning, Beaumont, Calimesa, Loma Linda, Redlands, Colton, and Grand Terrace, and in Riverside County areas east of the City of Banning and within San Timoteo Canyon.
- Impacts to tribal lands under the jurisdiction of the Morongo Band of Mission Indians.
- Potential impacts at a cemetery in Banning.
- Potential short-term impacts where construction activities during the 220 kV Upgrades may impede mining operations at two existing material extraction mines; long-term operational impacts would occur in the vicinity of the two extraction mines.

NOISE

- Impacts from construction noise generated by equipment operation.
- Potential impacts from noise generated during the operation of the proposed transmission line, which would increase ambient noise levels surrounding the corridor.
- Potential impacts from noise generated by helicopters used during construction and operation and maintenance activities.
- Potential impacts from noise in residential areas along the proposed transmission corridor, if construction activities violate local noise ordinances (for volume and hours of operation) in order to take advantage of low electrical draw periods.

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Environmental Issue Area / Potential Issues or Impacts

SOCIOECONOMICS

- Potential positive fiscal impacts in property-taxing jurisdictions, which would receive tax revenues from the proposed transmission line.
- Potential for project impacts to disproportionately affect low-income or minority populations (environmental justice).
- Potential impacts from employment of approximately 300 construction personnel.
- Potential impacts to lands of the Morongo Band of Mission Indians.

PUBLIC HEALTH AND SAFETY

- Potential impacts to air traffic safety from the installation of taller transmission towers.
- Potential for wildland fires caused by construction activities or by failing or failed transmission or distribution line.
- Potential safety risks to fire crews fighting a fire near rights-of-way.
- Potential impacts to public safety from helicopters carrying external loads.

PUBLIC SERVICES AND UTILITIES

- Possible impacts during construction activities from increased usage of public resources, services, and utilities.
- Possible impacts during construction activities from increased generation of waste and disposal needs.
- Potential for additional transmission line projects related to the growth of renewable energy projects in the project area.

RECREATIONAL RESOURCES

- Possible impacts upon established or pending conservation plans.
- Temporary disruption of recreational activities at the following recreational areas, among others: Noble Creek Regional Park and Oak Valley Golf Course.
- Potential impacts from road closures and increased traffic during construction activities, which may impede access to recreational areas.

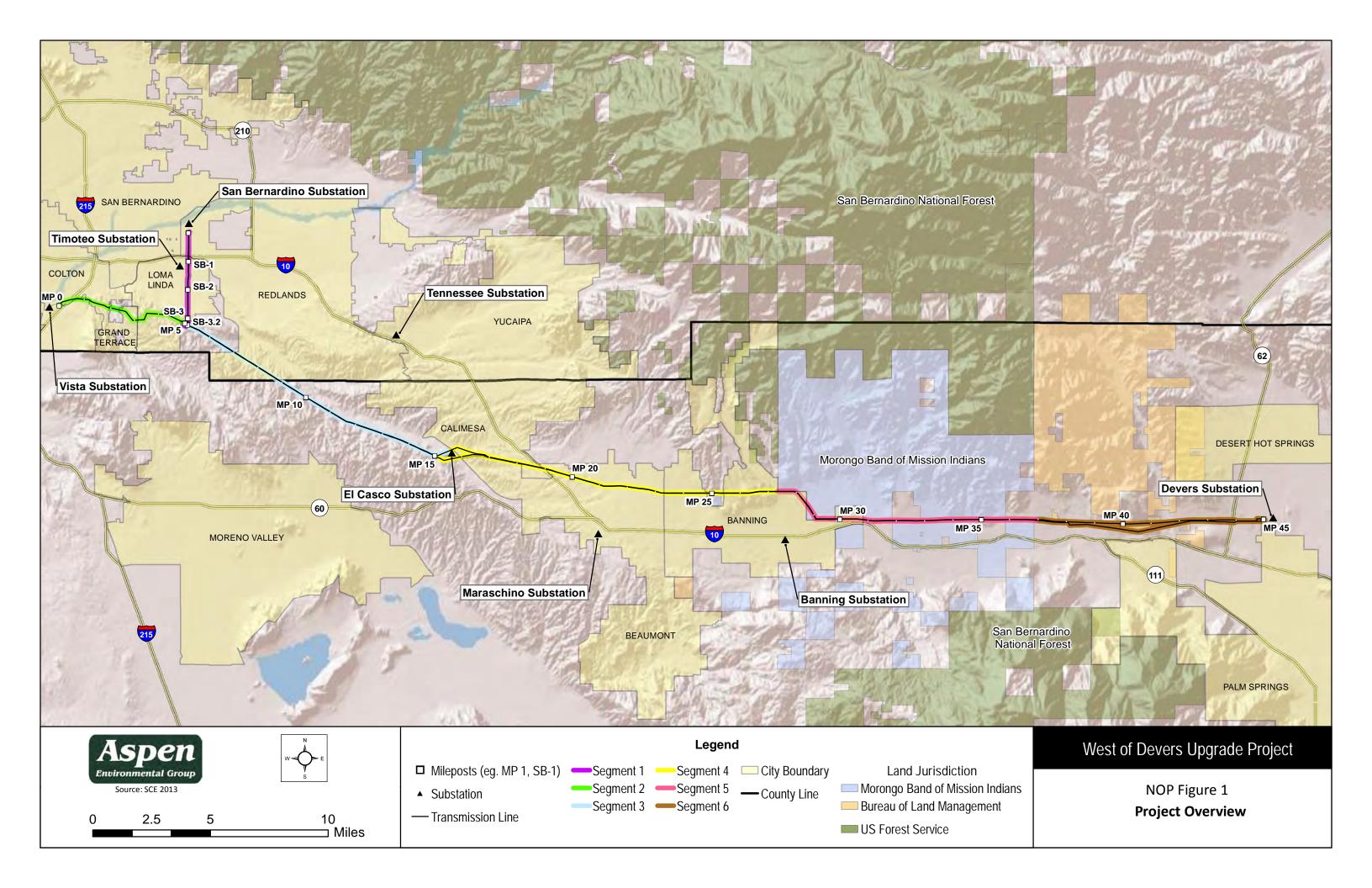
TRANSPORTATION AND TRAFFIC

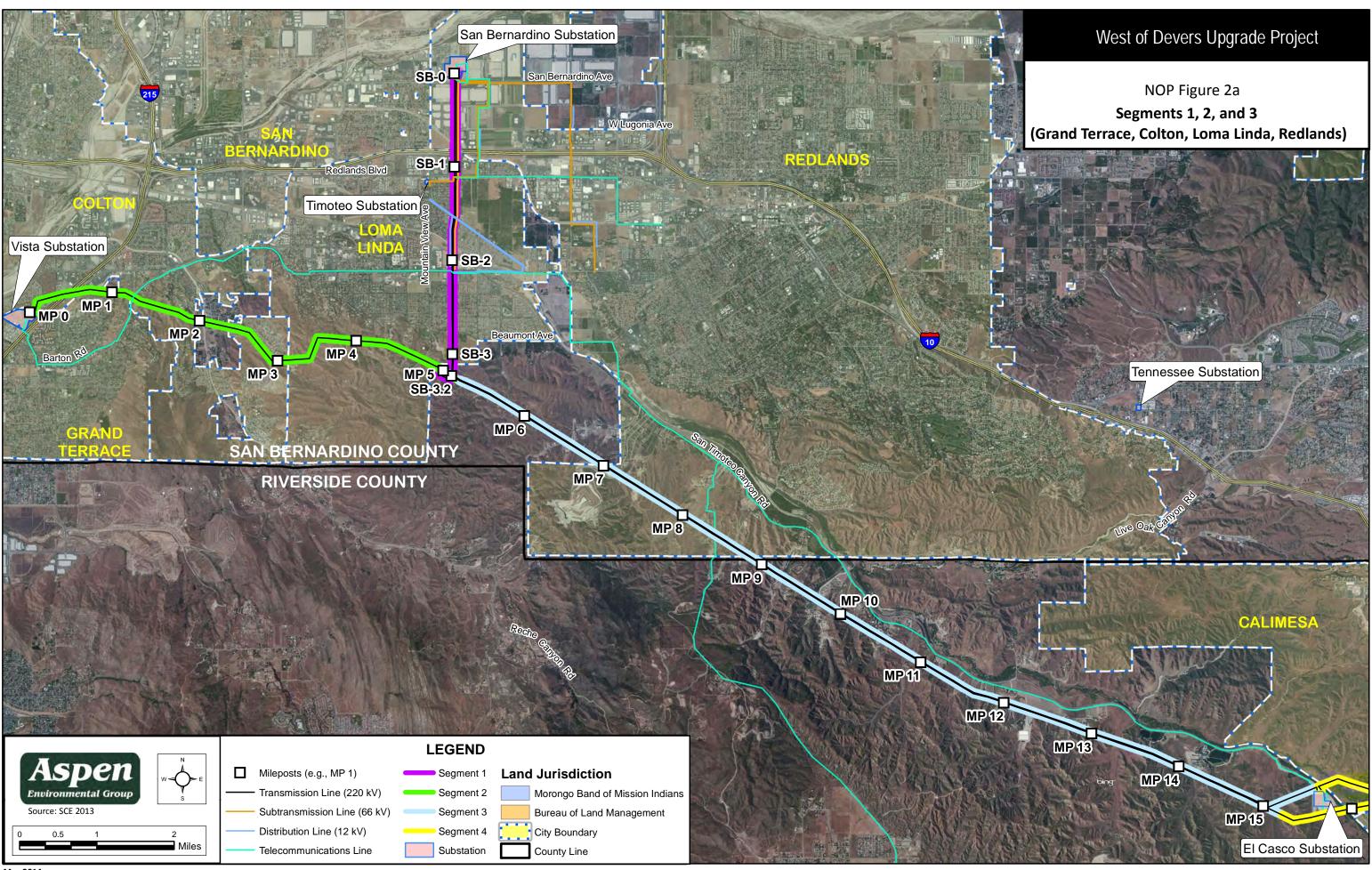
- Additional traffic in the vicinity of the proposed transmission line.
- Potential road closures during construction activities, which may impede access to areas along the transmission line corridor, including impediment of access for firefighting and police response.
- Potential increased traffic during operation and maintenance of the proposed transmission line.
- Short-term elimination of parking spaces.
- Potential impacts to compliance with FAA requirements that limit the height of structures around airports and hazard marking (e.g., Banning Airport).

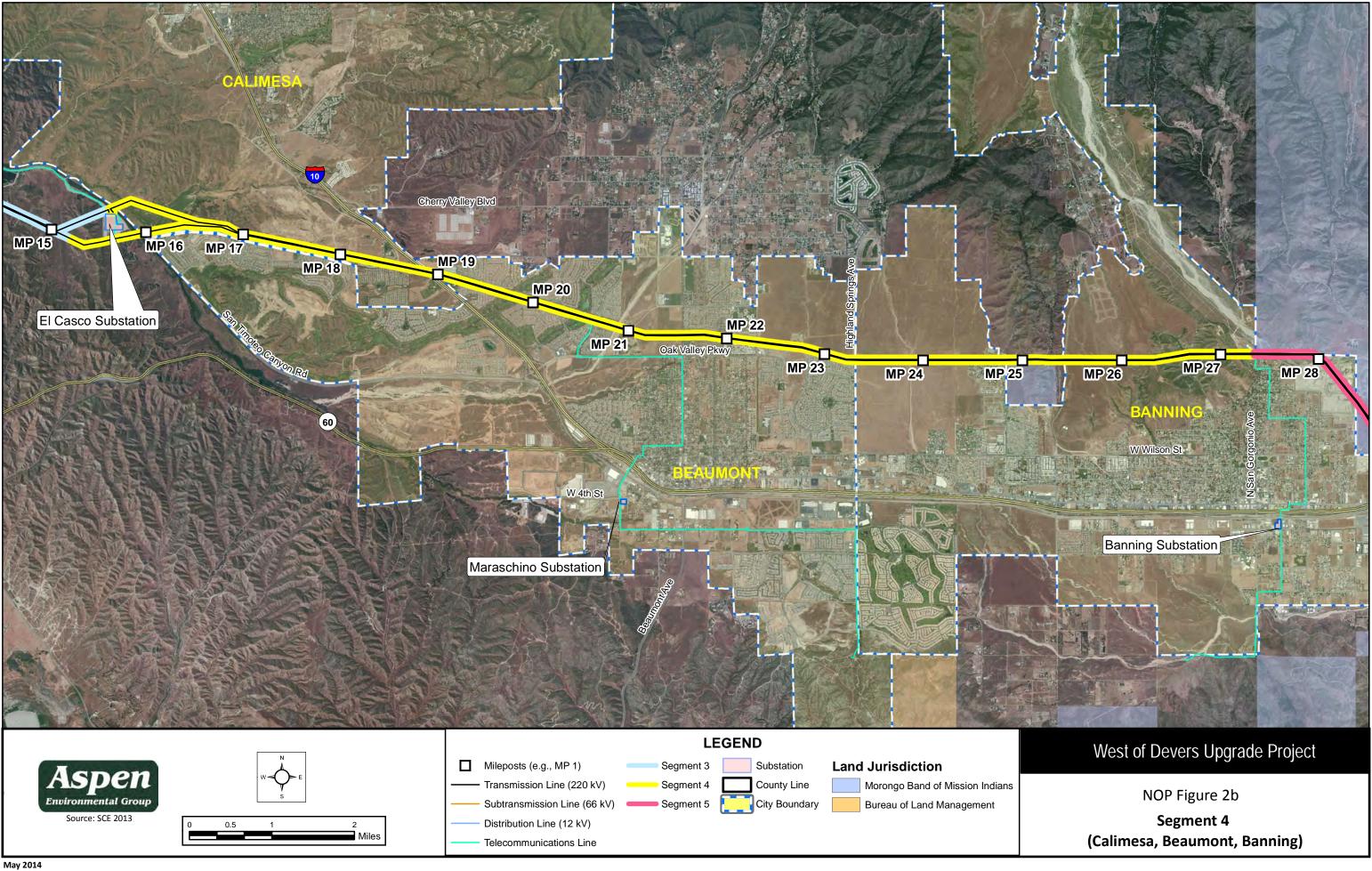
OTHER ISSUES

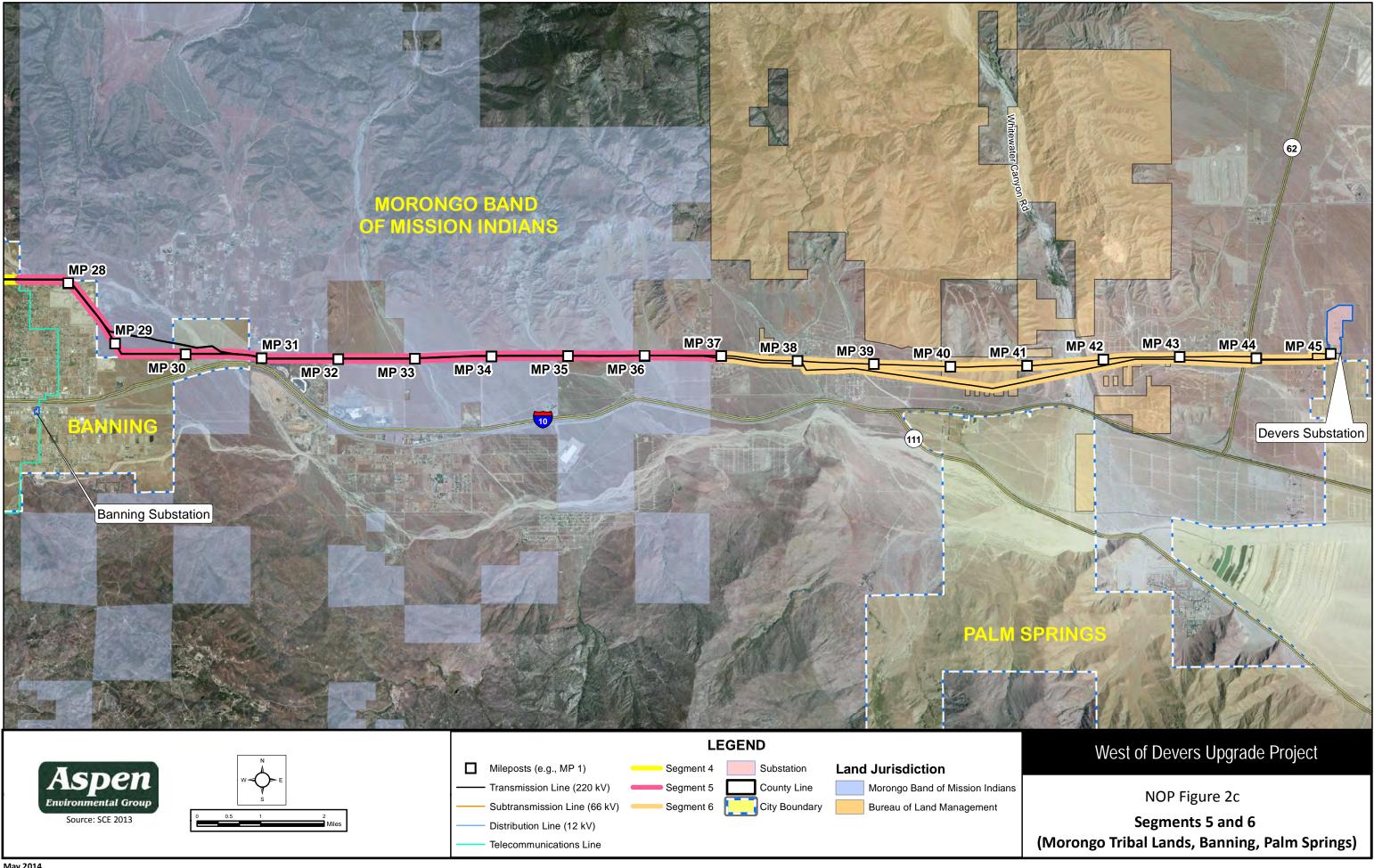
- Cumulative Impacts, including potential future transmission lines in the WOD corridor.
- Growth-Inducing Effects.
- Adequacy of CEQA and NEPA, ensuring effective coordination between CPUC, BLM, and BIA.
- Consideration of a reasonable range of alternatives.
- Enforceable and effective mitigation measures.

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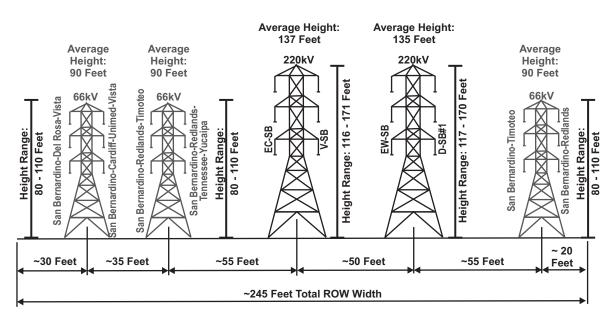




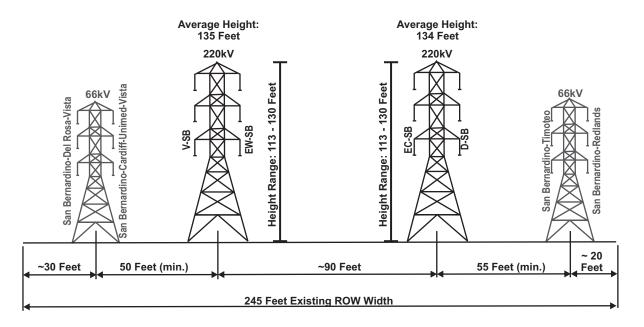




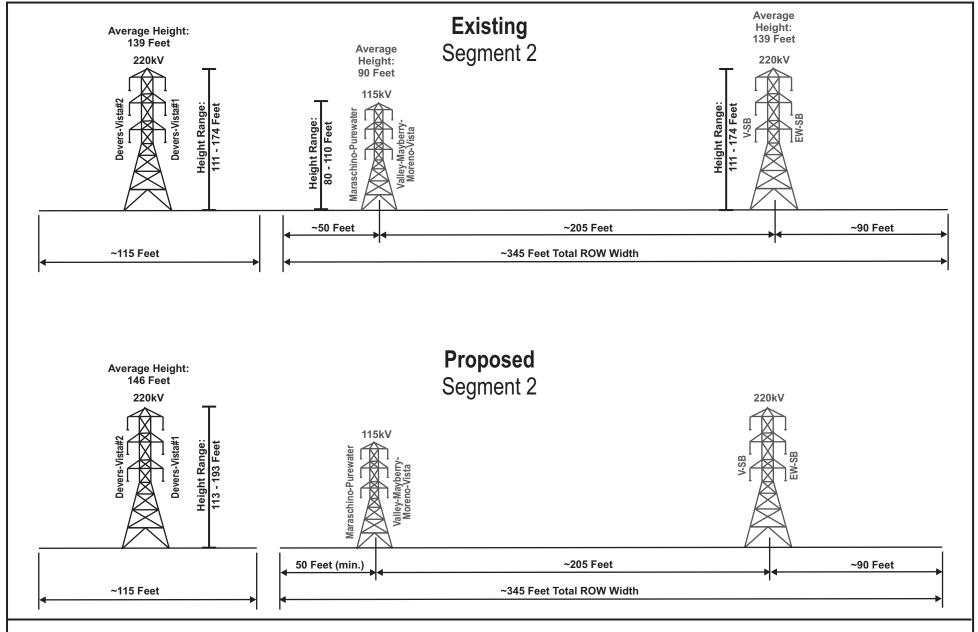




ProposedSegment 1









Source: SCE, 2013.

Figure 3b

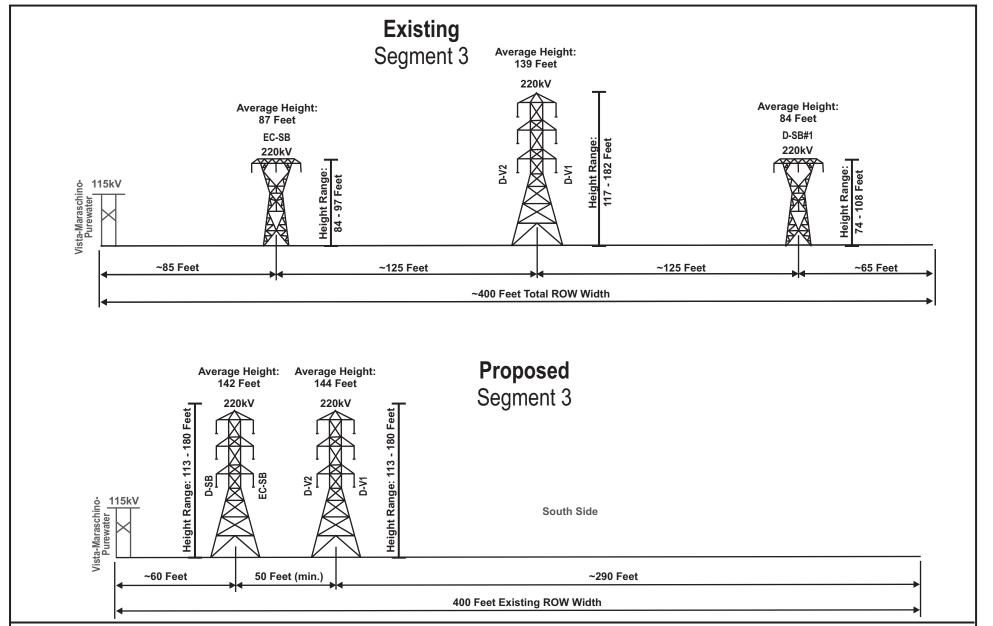




Figure 3c

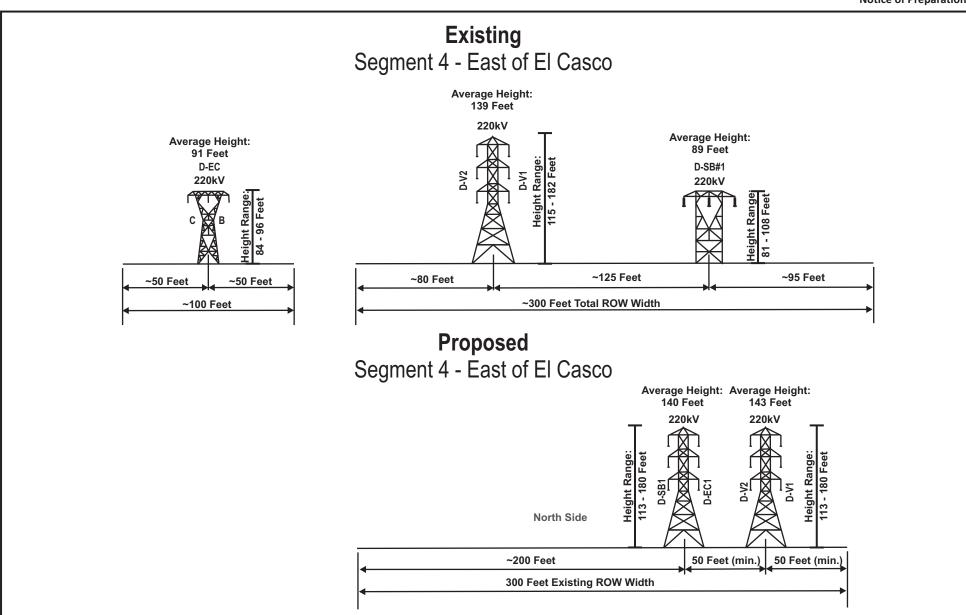
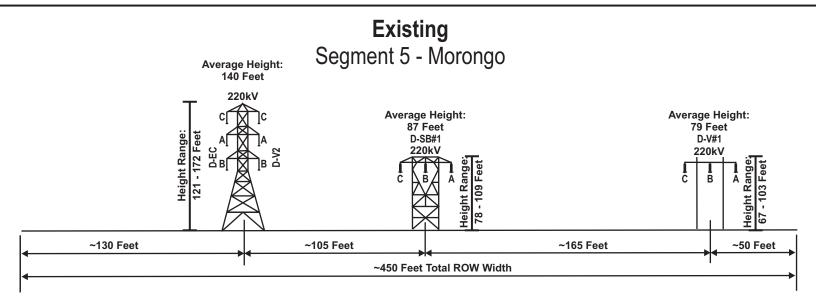


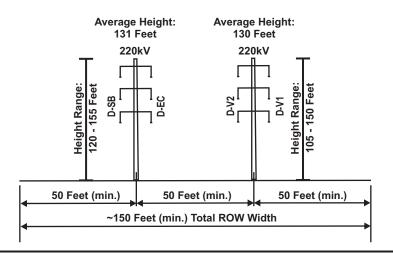


Figure 3d



Proposed (Current Design)

Segment 5A - Morongo



Proposed (Current Design)

Segment 5B - Morongo

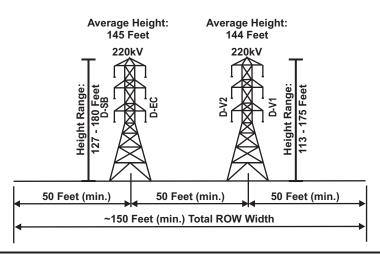
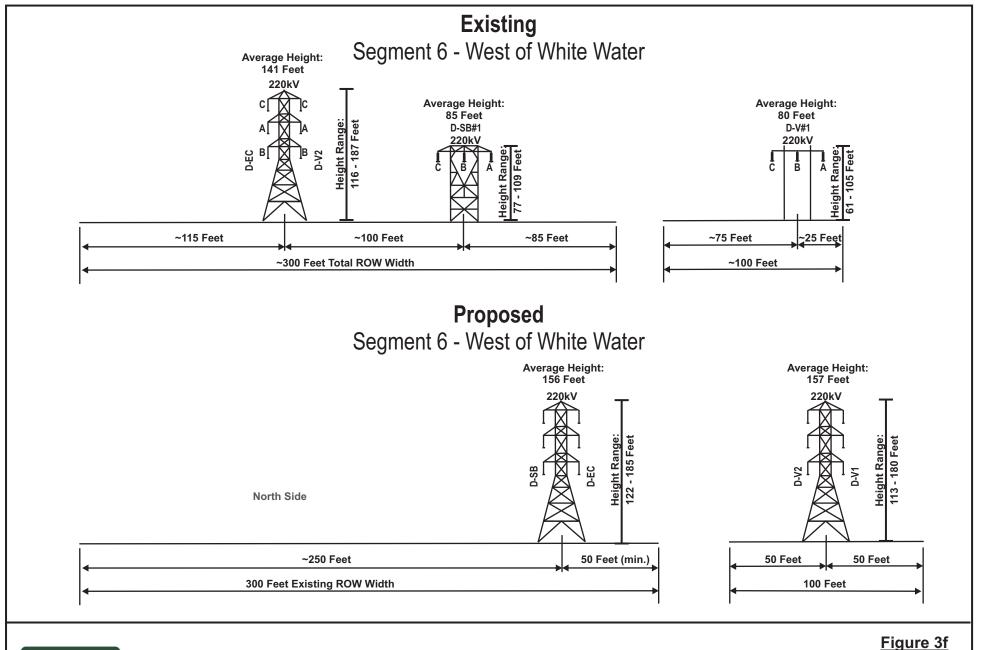




Figure 3e





Appendix A-2

Notice of Preparation – Spanish



Aviso de Preparación

De un Informe de Impacto Ambiental/ Declaración de Impacto Ambiental Conjunto para el

Proyecto de Mejoramiento West of Devers

Propuesto por Southern California Edison Aplicación No. A.13-10-020

A. Introducción

Southern California Edison (SCE) ha presentado una aplicación para un Certificado de Conveniencia y Necesidad Pública (CPCN) con la Comisión de Servicios Públicos de California (CPUC) para el Proyecto de Mejoramiento West of Devers, referido como el Proyecto Propuesto. La CPUC y el Departamento Interior de los Estados Unidos, Departamento de Manejo de Tierras (BLM) guiarán la preparación de un Informe de Impacto Ambiental (EIR) y una Declaración de Impacto Ambiental (EIS) conjunto referido como un EIR/EIS para el Proyecto Propuesto. La CPUC como la agencia líder bajo la ley de California, y el BLM, como la agencia líder federal prepararán un EIR/EIS para cumplir con la Ley de Calidad Ambienta de California (CEQA) y la Ley Nacional de Política Ambienta (NEPA).

Como requiere CEQA, esta Notificación de Preparación (NOP) de la CPUC se enviará a agencias interesadas y miembros del público. El propósito de la NOP es informar que la CPUC está comenzando la preparación de un EIR/EIS y solicitar información que ayudará el proceso de evaluación ambiental. Esta notificación incluye una descripción del proyecto que SCE construirá, un resumen de impactos potenciales del proyecto, los horarios y locales de las reuniones públicas, e información sobre como comentar. Durante el proceso para determinar el enfoque y contenido del EIR/EIS, habrán cuatro reuniones públicos (vea Sección E). El periodo de enfoque terminará el 12 de Junio de 2014.

Como requiere NEPA, el BLM publicará una Notificación de Intento (NOI) para preparar un EIR/EIS conjunto para el Proyecto Propuesto en el Registro Federal. Tanto como el NOP de la CPUC, el propósito del NOI será iniciar el periodo de enfoque para el EIR/EIS, proveer información acerca del Proyecto Propuesto, y servirá como una invitación para agencias cooperativas para proveer comentarios sobre el enfoque y contenido del EIR/EIS. En el NOI, el BLM establecerá un periodo de comentario adicional y tendrá una reunión pública adicional, probablemente en Junio 2014.

Un Informe de Enfoque será preparado para resumir los comentarios escritos a las dos agencias. Esta NOP de la CPUC, la NOI del BLM (después de la publicación en el Registro Federal) y el Informe de Enfoque se publicarán en el sitio web en la dirección siguiente:

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

B. Descripción del Proyecto

Como ilustra la **Figura 1** (Visión del Proyecto; acompañando esta NOP), el Proyecto Propuesto sería localizado primariamente dentro del corredor de la línea de alta tensión existente West of Devers en las áreas incorporadas y no incorporadas de los Condados de Riverside y San Bernardino incluyendo la Reserva del *Morongo Band of Mission Indians* y las ciudades de Banning, Beaument, Calimesa, Colton, Grand Terrace, Loma Linda, y Redlands. El corredor de West of Devers cruza áreas residenciales, comerciales, agrícolas, de recreación, y espacio libre.

El Proyecto de Mejoramiento West of Devers (WOD) incluye los componentes siguientes:

- Remover y mejorar líneas existentes de alta tensión de 220 kV mayormente dentro del corredor existente de WOD en seis segmentos, ilustrados en Figuras 2a, 2b, y 2c localizados al final de esta NOP. Figuras 3a a 3f ilustran la vista en sección transversal de cada segmento, indicando la vista actual de las torres existentes y la reconfiguración propuesta. Los segmentos del proyecto son las siguientes:
 - Segmento 1: San Bernardino. Eliminación de dos líneas de alta tensión de circuito-doble de 220 kV con 45 torres de circuito-doble (altura media de 136 pies) e instalación de 61 torres (altura media de 135 pies) instalados dentro del servidumbre (ROW) existente.
 - Segmento 2: Colton y Loma Linda. Una línea de 220 kV existente (altura media 139 pies) sería eliminada y reconstruida, incluyendo la eliminación de 29 torres de circuito-doble e instalación de 35 torres (altura media 146 pies).
 - Segmento 3: San Timoteo Canyon. Eliminación de tres líneas existentes de 220 kV, eliminando 116 torres individuales (altura media 86 pies para las torres de un solo circuito y 139 pies para las torres de circuito-doble) e instalación de do líneas nuevas con 133 torres (altura media 143 pies).
 - Segmento 4: Beaumont y Banning. Eliminar aproximadamente 175 estructuras (altura media 90 pies para las torres de un solo circuito y 139 pies para las torres de circuito-doble) e instalar aproximadamente 136 torres (altura media 142 pies).
 - Segmento 5: Tierra del Morongo Tribe y Vecindad. Seis millas de este segmento de 9.5 millas se encuentran sobre tierras del Morongo Band of Mission Indians. Para estas tierras, SCE examinó dos rutas opcionales, desde el 7 de Abril de 2014, la tribu ha indicado a SCE que la Ruta Opción 1 es la ruta preferida. Aproximadamente 137 estructuras serían eliminados (altura media 83 pies para las torres de un solo circuito y 140 pies para torres de circuito-doble) y se instalarían aproximadamente 108 estructuras (altura media 144 pies). Tres millas de servidumbre existente sobre la tierra Morongo serían abandonados y reubicados hacia el sur, cerca de la Autopista I-10 (Opción 1).
 - Segmento 6: Subestación Whitewater y Devers. Eliminación de aproximadamente 116 estructuras (altura media 83 pies para las torres de un solo circuito y 141 pies para torres de circuitodoble) e instalación de 93 torres (altura media 157 pies).
- Mejoramiento del equipo del subestación en las Subestaciones de Devers, El Casco, Etiwanda, San Bernardino, y Vista para acomodar el aumento de poder transferido sobre las líneas de 220 kV.
- Mejoramiento incluyendo la eliminación y reubicación de 2 millas de líneas existentes de 66 kV y mejoramiento de las Subestaciones de 66/12 kV Timoteo y Tennessee para acomodar estas líneas.
- Mejora de la línea de distribución de electricidad incluyendo eliminar y reubicar 4 millas de líneas existentes de 12 kV.
- Instalación de líneas de telecomunicación y equipos para la protección, observación, y control de las líneas de alta tensión y equipo de las subestaciones.

Propósito del Proyecto. Según SCE, se necesita el Proyecto Propuesto por seis razones principales:

- 1. Para integrar y conectar generación de poder dentro de las áreas de Blythe y Desert Center.
- 2. Para cumplir con Acuerdos de Interconexión de Generador Mayor (LGIAs) en las áreas de Blythe y Desert Center para cumplir la entrega de energía de proyectos solares en estos áreas.
- 3. Para integrar nueva generación en las áreas de Blythe y Desert Center con Acuerdos de Adquisición de Energía (PPAs) ejecutados.
- 4. Para integrar generación de recursos renovables que se desarrolla en el Valle Coachella.

- 5. Para cumplir con los Estándares de Confiabilidad y las Prácticas Comerciales Regionales desarrollados por el Consejo de Confiabilidad Eléctrica de Norte América, Consejo del Coordinación de Electricidad del Oeste, y Operador del Sistema Independiente de California, y la empresa de servicios públicos individuo.
- 6. Para facilitar el progreso hacia los objetivos de energía renovable (Renewable Portfolio Standard) de California.

SCE ha presentado los seis objetivos siguientes en su Evaluación Ambiental del Proponente (PEA):

- 1. Asegurar que SCE cumple con su obligación para integrar y entregar la producción de la nueva generación de proyectos localizados en Blythe y Desert Center que han requeridos la interconexión con la red de electricidad.
- 2. Como dicte planificación prudente para líneas de alta tensión, usar servidumbres existentes para líneas de alta tensión lo máximo posible.
- 3. Satisfacer la necesidad para el proyecto mientras minimizar los impactos ambientales.
- 4. Facilitar progreso hacia los objetivos de California para energía renovable en una manera oportuna y rentable para SCE y otros servicios públicos de California.
- 5. Cumplir con los Estándares de Confiabilidad y las Prácticas Comerciales Regionales desarrollados por el Consejo de Confiabilidad Eléctrica de Norte América, Consejo del Coordinación de Electricidad del Oeste, y Operador del Sistema Independiente de California; y diseñar y construir conforme a los métodos de diseño y estándares de construcción aprobados para proyectos de subestaciones, líneas de alta tensión, líneas de baja tensión, y líneas de distribución.
- 6. Construir el proyecto en una manera oportuna y rentable y minimizar las interrupciones de servicio lo máximo posible.

Los objetivos presentados por SCE guiarán el desarrollo de las alternativas al Proyecto de Mejoramiento West of Devers, pero CEQA no requiere que las alternativas cumplen con todos los objetivos. Por lo tanto, no serán utilizados para restringir excesivamente el proceso de desarrollar las alternativas.

C. Historia del Proyecto

C.1 Aplicaciones Anteriores a la CPUC Relacionadas a West of Devers

Originalmente, SCE presentó una aplicación (A.05-04-015) con la CPUC para un CPCN para construir el proyecto Devers—Palo Verde No. 2 (DPV2) el 11 de Abril, 2005. El proyecto incluyó tres componentes:

- Una línea de alta tensión de 500 kV desde Palo Verde en Arizona hasta una subestación nueva cerca de Blythe, California;
- Una línea de alta tensión de 500 kV desde la subestación de Blythe hasta las subestación de Devers; y
- Mejoramientos al sistema de líneas de alta tensión al oeste de la subestación de Devers.

La CPUC aprobó el Proyecto DPV2 en Enero de 2007 con la Decisión D.07-01-040. El proyecto aprobado incluyó el propuesto de SCE pero no incluyó el segmento West of Devers; no se podía aprobar este segmento (en Enero de 2007) ya que SCE no tenía un acuerdo con el *Morongo Band of Mission Indians* acerca de la reafirmación del uso de la servidumbre para las 6 millas que cruzan la tierra tribal. Por lo tanto, la CPUC aprobó la construcción de una línea de alta tensión nueva de 500 kV que une la Subestación Devers con la Subestación Valley. La construcción del Proyecto DPV2, incluyendo la línea de Devers a Valley, ya se realizó.

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C.2 Memorando de Acuerdo con el Morongo Band of Mission Indians

En 2013, SCE y el *Morongo Band of Mission Indians* llegaron a un acuerdo sobre los términos de la reafirmación del uso de servidumbre para el corredor dentro de la tierra Morongo. Este acuerdo concede cuatro servidumbres nuevas autorizando el uso para operación, mantenimiento, inspección, y mejoramiento y acceso a comodidades existentes, a cambio de compensación para el uso de las tierras en reservas para Comodidades Existentes y Comodidades Futuros. Además, han permitido un corredor para la construcción, uso, operación, mantenimiento, inspección, mejoramiento, y acceso a Comodidades Futuras, incluyendo dos líneas de alta tensión de 220 kV de circuito-doble o cuatro líneas de 220 kV de un solo circuito si restricciones de ingeniería requieren líneas de un solo circuito.

C.3 Proyecto Actual de Mejoramiento West of Devers

Después de conseguir un acuerdo con el *Morongo Band of Mission Indians*, SCE presentó una aplicación de CPCN para el Proyecto de Mejoramiento West of Devers con la CPUC y presentó un Plan de Desarrollo con el BLM. SCE entregó la aplicación y el PEA el 25 de Octubre de 2013. La CPUC hizo un repaso de completad/deficiencia. Basado en este repaso, la CPUC mandó una carta de deficiencia a SCE el 25 de Noviembre de 2013, indicando que la PEA era incompleta. SCE entregó información adicional para responder a la carta de deficiencia entre mitades de Diciembre 2013 y fines de Enero 2014.

SCE ha dicho que la información restante identificado en la carta de deficiencia de la CPUC (fechado 25 de Noviembre de 2013) será sometida antes del fin de Junio 2014. Por los tanto, la CPUC mandó otra carta el 18 de Febrero de 2014 indicando que la PEA continúa incompleta. Sin embargo, mientras que SCE reúne la información requerida para la preparación de un EIR/EIS Borrador completo y adecuado, la División de Energía ha decidido continuar con la emisión de esta Notificación, el enfoque y consultación de las agencias, y la preparación y repaso del EIR/EIS Borrador interno inicial.

D. Análisis de Impactos Ambientales Potenciales

De acuerdo con las guía de CEQA y NEPA, la CPUC y el BLM intentan preparar un EIR/EIS conjunto para evaluar los impactos ambientales potenciales del Proyecto Propuesto, y proponer medidas para mitigar los efectos significativos identificados. El EIR/EIS también estudiará los impactos ambientales de las alternativas al Proyecto Propuesto e identificará medidas para mitigar estos efectos.

Basado en el análisis preliminar del Proyecto Propuesto y el repaso de los documentos entregados por SCE y otros partidos, el Proyecto Propuesto podría tener un número de impactos ambientales significativos. Asuntos e impactos potenciales al medio-ambiente incluyen la lista atajada en el Documento A, ajuntado a esta Notificación. No se ha hecho determinaciones a cerca de los impactos potenciales, estas determinaciones serán hechas durante el análisis conducido en el EIR/EIS. Para analizar los asuntos listados y otros problemas elevados durante el periodo de enfoque, el EIR/EIS evaluará impactos cumulativos del proyecto en combinación con otros proyectos actuales o propuestos en el área.

Medidas de Mitigación. SCE ha propuesto medidas que podrían reducir o eliminar impactos potenciales del Proyecto Propuesto. La eficacia de estas medidas (llamadas "medidas propuestas por el solicitante") serán evaluadas en el EIR/EIS, y medidas adicionales ("medidas de mitigación") serán desarrolladas para reducir impactos, si necesario. Cuando la CPUC y el BLM tomen sus decisiones finales a cerca del Proyecto Propuesto, definirán las medidas de mitigación que serán adoptadas como condiciones del proyecto, y la CPUC implementará un programa de monitorear las medidas.

Alternativas. A demás de medidas de mitigación, el EIR/EIS evaluará alternativas al Proyecto Propuesto que podrían reducir, eliminar, o evitar impactos del proyecto. Alternativas pueden incluir desviaciones menores y diseños diferentes de las estructuras dentro del servidumbre, rutas diferentes para las líneas

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de alta tensión (en otros corredores), y nuevas líneas de alta tensión y subestaciones y/o equipo que podría alcanzar la necesidad del sistema eléctrica y los objetivos del Proyecto Propuesto. Para cumplir con CEQA y NEPA, el EIR/EIS Borrador necesita describir un alcance razonable de alternativas al proyecto o la localidad del proyecto que podrían alcanzar la necesidad, los objetivos básicos, y evitar o reducir los impactos ambientales significativos del Proyecto Propuesto. Adicionalmente la Alternativa de No Hacer el Proyecto/No Tomar una Acción será analizado en el EIR/EIS Borrador. Esta alternativa analizará lo que ocurre en la ausencia del Proyecto Propuesto. El EIR/EIS tiene que evaluar los méritos comparativos de las alternativas.

En la PEA para WOD, SCE evaluó una variedad de alternativas del proyecto que podrían lograr los mismos objetivos que el Proyecto Propuesto, incluyendo rutas alternativas, proyectos alternativas, y alternativas que no son líneas de alta tensión. Como parte del proceso de evaluación ambiental, la CPUC y el BLM evaluarán la factibilidad de las alternativas presentadas por SCE en la PEA y considerarán si son adecuados bajo CEQA y NEPA. La CPUC y el BLM probablemente desarrollarán otras alternativas para evaluar en el EIR/EIS. Alternativas nuevas desarrolladas durante el proceso de evaluación ambiental para el Proyecto Propuesto podrían ser basadas sobre información recibida durante el proceso del enfoque y los impactos identificados durante el análisis.

E. Reuniones Públicas de Enfoque

La CPUC va a tener cuatro Reuniones de Enfoque públicas en tres locales dentro del área del proyecto, identificado en Lista 1. El propósito de las reuniones es presentar información sobre el Proyecto Propuesto y el proceso de tomar la decisión de la CPUC y el BLM, y para atender a los puntos de vista del público sobre las preocupaciones relevantes al enfoque y contenido del EIR/EIS.

Lista 1. Reuniones Públicos de Enfoque					
Local	Banning, CA	Loma Linda, CA	Beaumont, CA		
Fecha	Lunes 19 de Mayo de 2014	Martes 20 de Mayo de 2014	Miércoles 21 de Mayo de 2014		
Horario(s)	6:00 a 8:00 p.m.	6:00 a 8:00 p.m.	3:00 a 5:00 p.m. <u>y</u> 7:00 a 9:00 p.m.		
Dirección	Banning City Hall Cámara de Consejo 99 E. Ramsey Street Banning, CA 92220	Loma Linda Civic Center Sala de la Comunidad 25541 Barton Road Loma Linda, CA 92354	Beaumont Civic Center Auditorio/Gimnasio 550 E. 6th Street Beaumont, CA 92223		

F. Comentarios de Enfoque

CPUC Determinación del Enfoque bajo CEQA: La CPUC está solicitando información acerca de los temas y alternativas que deberían ser incluido en el EIR/EIS. Sugerencias para como someter comentarios son presentados al fin de esta sección. **Bajo el periodo de enfoque de la CPUC, comentarios necesitan ser recibidas el 12 de Junio de 2014 a lo más tarde.**

BLM Determinación del Enfoque bajo NEPA: El personal del BLM participará en las reuniones listados arriba. Sin embargo, después de la publicación de la NOI en el Registro Federal, el BLM tendrá una reunión adicional en el área del proyecto. Habrá una notificación para esta reunión en periódicos locales y sobre los sitios web del BLM y la CPUC. La publicación del NOI comenzará un periodo de enfoque adicional de 30 días según NEPA durante la cual se puede comentar sobre el enfoque del EIR/EIS.

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Comentarios sobre el Enfoque: Uno puede someter comentarios en los siguientes métodos: (1) por correo postal, (2) por correo electrónico, (3) por fax, o (4) asistiendo a las Reuniones Públicos (vea el horario y local arriba) y haciendo un comentario verbal o entregando un comentario escrito.

Individuos quienes responden pueden solicitar confidencialidad. Si usted quiere retener su nombre o dirección del público o de ser revelado bajo el *Freedom of Information Act*, necesita decir esto claramente al comienzo de su comentario. Pedidos serán honorados tanto como permite la ley. La CPUC y BLM no considerarán comentarios anónimos. Todos los comentarios de organizaciones o negocios, y de individuos que se identifican como representantes u oficiales de organizaciones o negocios, serán disponible para inspección público en su totalidad.

Por Correo: Si quiere enviar comentarios por correo postal, por favor use el correo de primera clase e incluye su nombre y dirección. Por favor envíe comentarios escritos sobre el enfoque del EIR/EIS a:

Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager) California Public Utilities Commission & Bureau of Land Management c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002 Fax y Mensaje de Voz: (888) 456-0254

Por Correo Electrónico: Comunicaciones por correo electrónico son bienvenidos; pero por favor incluye su nombre y dirección en el mensaje de email. Envíe correo electrónico a westofdevers@aspeneg.com.

Por fax: Usted puede mandar su comentario a la línea de información al (888) 456-0254. Por favor incluye su nombre y dirección en el fax, escribe legiblemente, y use tinta negra o azul.

Un **Informe del Enfoque** será preparado, resumiendo todos los comentarios recibidos (incluyendo los comentarios orales hechos durante las Reuniones Públicas). Este informe será publicado en el sitio web: http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm, y copias serán depositado en los repositos listados en la Lista 2, abajo. Además, una cantidad limitada de informes serán disponibles a pedido de la CPUC.

Sugerencias por Participar Efectivamente en el Enfoque

Aquí se encuentran sugerencias para preparar y proveer información útil para el proceso del EIR/EIS.

- Revisar la descripción del proyecto (vea la Sección C de esta notificación y los mapas). Detalles adicionales sobre la descripción del proyecto se encuentran el sitio web del proyecto donde en la Evaluación Ambiental del Proponente.
- 2. Asistir a las reuniones públicas para acceder a más información sobre el proyecto y el proceso de revisión ambiental (ver horarios y fechas arriba).
- 3. Entregar comentarios escritos o atender a las reuniones públicas y comentar oralmente. Explicar los temas que el EIR/EIS debe incluir.
- 4. Sugerir medidas de mitigación que pueden reducir los impactos potenciales del Proyecto Propuesto.
- 5. Sugerir alternativas al Proyecto Propuesto que pueden evitar o reducir impactos del Proyecto Propuesto.

G. Para Información Adicional sobre el Proyecto

Sitio Web – Información sobre esta aplicación y el proceso de evaluación ambiental será publicado en el internet al http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm. Este sitio será usado para publicar todos los documentos públicos durante el proceso de evaluación ambiental y para anunciar reuniones públicas. A demás, una copia del PEA se encuentra sobre el sitio web, y el EIR/EIS Borrado será publicado en el sitio web después de ser listo.

Número para Información – Puede pedir información sobre el proyecto dejando un mensaje de voz al (888) 456-0254 o mandando un fax, usando el mismo número telefónico.

Reposito de Documento – Documentos relacionados al Proyecto WOD y el EIR/EIS serán disponibles en los sitios alistados en la Lista 2.

Lista 2. Repositorios de los Documentos del Proyecto					
West of Devers – Locales de Bibliotecas					
Biblioteca City of Riverside	3581 Mission Inn Avenue, Riverside, CA 92501(951) 826-	5201			
Biblioteca San Bernardino County	104 W. Fourth Street, San Bernardino, CA 92415(909) 387-	5723			
Biblioteca Pública Colton	656 N. Ninth Street, Colton, CA 92324(909) 370-	5083			
Biblioteca Grand Terrace	22795 Barton Road, Grand Terrace, CA 92313(909) 783-	0147			
Biblioteca City of Loma Linda	25581 Barton Road, Loma Linda, CA 92354(909) 796-	8621			
Biblioteca A.K. Smiley Public	125 West Vine Street, Redlands, CA 92373(909) 798-	7565			
Biblioteca Mentone County	1870 Mentone Boulevard, Mentone, CA 92359(909) 794-	2657			
Biblioteca Yucaipa Branch	12040 5th Street, Yucaipa, CA 92399(909) 790-	3146			
Biblioteca Calimesa City	974 Calimesa Boulevard, Calimesa, CA 92320(909) 795-	9807			
Biblioteca Beaumont District	125 East 8th Street, Beaumont, CA 92223(951) 845-	1357			
Biblioteca Pública Banning	21 W Nicolet Street, Banning, CA 92220(951) 849-	3192			
Biblioteca Morongo Community	11581 Potrero Road, Banning, CA 92220(951) 849-	5937			
West of Devers – Oficina de U.S Bureau of Land Management					
Palm Springs/So. Coast Field Ofc	1201 Bird Center Drive, Palm Springs, CA 92262(760) 833-	7100			
California Desert District Office	22835 Calle San Juan Del Los Lagos, Moreno Valley, CA 92553(951) 697-5200				

^{*}Se puede obtener copias de estos materiales en estos locales al coste.

H. Emisión del NOP

La Comisión de Servicios Públicos de California por este medio emite esta Notificación de Preparación de un Informe de Impacto Ambiental.

Billie Blanchard, Project Manager

División de Energía

Comisión de Servicios Públicos de California

Fecha: May 5, 2014

Documento A – Resumen de Asuntos e Impactos Potenciales: Proyecto West of Devers

Asuntos Ambientales / Asuntos o Impactos Potenciales

DISEÑO ESTÉTICO / VISUAL

- Impactos visuales pueden ocurrir en puntos de vista susceptibles donde la línea de alta tensión propuesta sería visible, incluyendo: residentes, parques y áreas de recreación, áreas abiertas, cementerios, y rutas de viaje y carreteras.
- Impactos visuales de corto plazo durante la construcción.
- Impactos visuales de largo plazo a residentes a lo largo del corredor WOD causada por la altura aumentado y las localidades de las torres propuestas comparadas a las torres actuales.
- Impactos visuales potenciales de corto plazo a personas viajando en la local donde la línea de alta tensión cruza o corre en paralelo a rutas, como la I-10 y CA 62.

RECURSOS AGRÍCOLAS

- Impactos temporarios ocurrirán durante la construcción causada por la eliminación de tierras de cultivo e interferencia con actividades agrícolas (incluyendo arar e irrigación, restricción de acceso a áreas agrícolas, y/o conflictos potenciales con aviones fumigadores).
- Proyecto podría convertir tierras de cultivo a otro uso. Impactos a largo plazo ocurrirán donde las bases de las torres eliminarían permanentemente actividades agrícolas e interferirían con las operaciones agrícolas (incluyendo arar e irrigación).
- Impactos potenciales relacionados a la zonificación para uso agrícola.

CALIDAD DE AIRE Y GASES DE EFECTO INVERNADERO

- Impactos durante la construcción podrían ocurrir a causa de polvo aerotransportado y equipo pesado, helicópteros, vehículos de apoyo, y otro equipo de motor de combustión interna que genera gases de escape que contienen: monóxido de carbón (CO), compuestos orgánicos volátiles (VOC), óxidos de nitrógeno (NOx), óxidos de azufre (SOx), material particulado (PM10 y PM2.5), y gases de efecto invernadero.
- Impactos potenciales a causa de emisiones y polvo fugitivo producido durante la operación y mantenimiento de las líneas de alta tensión propuesta.
- Impactos potenciales a la salud humana y ambiental a causa de contribuir a las condiciones existentes que no cumplen con los Estándares Ambientales Nacionales de la Calidad de Aire (NAAQS) del EPA y los estándares de California para material particulado y ozono.
- Emisiones totales generadas por las actividades de construcción excederían las recomendaciones del Distrito de Manejo de la Calidad de Aire del *South Coast* (SCAQMD).
- Implementación del proyecto puede estar en conflicto con los planes, la política o la regulación adoptada con el propósito de reducir gases de efecto invernadero.

RECURSOS BIOLÓGICOS – VEGETACIÓN

- Impactos potenciales temporarios y permanentes a comunidades de vegetación sensible a causa de la eliminación de las líneas existentes y la construcción de líneas nuevas.
- Impactos causados por el aumento por hierbas no nativas que se establecen en los bases de torres, áreas de grúa, depósitos de reservas de materiales, y sitios para la planta de mezcla de cemento.
- Impactos potenciales temporarios y permanentes a plantas sensibles, incluyendo el *Coachella Valley milkvetch* y *Nevin's barberry*.
- Impactos potenciales temporarios y permanentes a humedales federales o estatales o drenajes que no son humedales a causa de eliminación de vegetación, colocación de relleno, erosión, sedimentación, y degradación de la calidad de agua.

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Documento A – Resumen de Asuntos e Impactos Potenciales: Proyecto West of Devers

Asuntos Ambientales / Asuntos o Impactos Potenciales

RECURSOS BIOLÓGICOS – FAUNA

- Impactos potenciales directos y permanentes a fauna, ya que pueden ser atropellado por vehículos durante construcción.
- Impactos directos e indirectos potenciales a reptiles listados en la Base de Datos de Diversidad Natural de California (CNDDB), incluyendo el lagarto de Coachella Valley.
- Impactos directos e indirectos, temporales y permanentes potenciales a los siguiente fauna: tortuga del desierto, los pájaros coastal California gnatcatcher, Least Bell's vireo, southwestern willow flycatcher, y western yellow-billed cuckoo, la rata canguro Stephens', y el zorro del desierto.
- Impactos potenciales directos y permanentes a roedores de madriguera, ya que equipo pesado puede derrumbar la madriguera y matar los roedores.
- Impactos potenciales directos e indirectos a especies de pájaros listados en el CNDDB incluyendo lechuzas, águilas reales, y halcones peregrinos.
- Impactos potenciales a pájaros y murciélagos, ya que pueden chocar con conductores eléctricos o con las líneas durante vuelo.

Pájaros Haciendo Nidos

- Impactos potenciales directos y permanentes a pájaros haciendo nidos en estructuras, equipo, cactus, arbustos, árboles, o sobre el suelo, si los nidos son perturbados o destruidos.
- Impactos potenciales a pájaros haciendo nidos a causa del viento producido por los rotores de helicópteros, ruido, polvo, y vibraciones.

RECURSOS CULTURALES

Sitios Arqueológicos

Impactos potenciales a sitios arqueológicos conocidos y no conocidos durante construcción.

Propiedades Culturales Tradicionales

- Impactos potenciales a Propiedades Culturales Tradicionales (TCPs) o TCPs potenciales de la construcción, operaciones, y mantenimiento de la línea de alta tensión propuesta.
- Impactos potenciales etnográficos donde el corredor del Mejoramiento de WOD cruza la Reserva del Morongo Band of Mission Indians.

Sitios Históricos

Impactos potenciales a sitios históricos que son elegibles potencialmente para ser listado en el NRHP.

Recursos Paleontológicos

■ Impactos potenciales a recursos paleontológicos entre las Subestaciones Devers y Vista, donde el corredor de Devers cruza 26 millas de áreas con sensibilidad paleontológico alta o indeterminado incluyendo: depósitos aluviales Pleistoceno, Conglomerado *Canebrake* o la Formación *Palm Springs*, y Formación San Timoteo.

Mayo 2014 9

Documento A – Resumen de Asuntos e Impactos Potenciales: Proyecto West of Devers

Asuntos Ambientales / Asuntos o Impactos Potenciales

SUELOS Y LA GEOLOGÍA

- Impactos potenciales a causa de aplanar las rutas de acceso y áreas asfaltadas de las torres.
- Impactos potenciales a causa de erosión sobre pendientes y áreas aplanadas acantilados.
- Impactos potenciales por actividades sísmicos en las zonas de fallas en el área del proyecto. Las torres en el área serían sometidos a terremotos sísmicos severos a través de la vida del Proyecto Propuesto.
- Impactos potenciales de quebradura del suelo donde la línea de alta tensión potencial cruzaría zonas de fallas activas.
- Impactos posibles de derrumbes, flujo de barro, u otras quiebras relacionadas a actividades sísmicas en particular donde la línea de alta tensión cruza zonas de fallas activas.

PELIGROS Y MATERIALES PELIGROSOS

- Impactos potenciales a causa de almacenamiento incorrecto de materiales peligrosos y/o residuos peligrosos durante la construcción del proyecto, operación, o mantenimiento.
- Impactos potenciales a causa de fugas o derrames de petróleo o fluidos hidráulicos de equipos de construcción u otros vehículos durante la construcción, operación, o mantenimiento.
- Impactos potenciales si descubren materiales peligros durante actividades de excavación causando derrames tóxicos al medio ambiente.

HYDROLOGÍA Y CALIDAD DE ÁGUA

- Impactos potenciales que aumentan escorrentía de agua, erosión, y sedimentación.
- Impactos potenciales a arroyos o arroyos fluviales a causa de violaciones a los estándares de la calidad de agua o la descarga de desechos.

USO DEL SUELO

- Conflictos posibles con ordenamientos territoriales, políticas, o regulaciones adoptados para evitar o mitigar impactos ambientales.
- Efectos sobre terratenientes, negocios, e instalaciones públicos o comunitarios en las Ciudades de Banning, Beaumont, Calimesa, Loma Linda, Redlands, Colton, y Grand Terrace, y en las áreas del Condado de Riverside al este de la Ciudad de Banning y dentro del Cañón de San Timoteo.
- Impactos a tierras tribales bajo la jurisdicción del Morongo Band of Mission Indians.
- Impactos potenciales al cementerio en Banning.
- Impactos potenciales a corto plazo donde actividades de construcción del Proyecto Propuesto podrían impedir operaciones mineras en dos minas existentes; impactos a largo plazo donde operación del proyecto ocurriría en la vecindad de las dos minas.

RUIDO

- Impactos a causa del ruido de la construcción generado por el equipo maquinaria.
- Impactos potenciales a causa de ruido generado durante la operación del Proyecto Propuesto, que aumentaría los niveles ambientales de ruido cerca del corredor.
- Impactos potenciales a causa de ruido generado por el uso de helicópteros durante actividades de construcción, operación, y mantenimiento.
- Impactos potenciales a causa de ruido en áreas residenciales cerca del corredor propuesto, si las actividades de construcción violan las ordenanzas de ruido local (volumen y horas de operación) para poder aprovechar de periodos con bajo uso de electricidad.

Documento A - Resumen de Asuntos e Impactos Potenciales: Proyecto West of Devers

Asuntos Ambientales / Asuntos o Impactos Potenciales

SOCIOECONOMÍA

- Impactos positivos fiscales en las jurisdicciones que imponen impuestos, que recibirán ingresos a causa de la línea de alta tensión.
- Impactos potenciales que impactan desigualmente a personas de bajos ingresos o minorías (justicia ambiental).
- Impactos potenciales a causa del empleo de aproximadamente 300 obreros de construcción.
- Impactos potenciales a tierras del Morongo Band of Mission Indians.

SALUD PÚBLICA Y SEGURIDAD

- Impactos potenciales a causa de la seguridad del tráfico aéreo por la instalación de las torres altas.
- Potencial de incendios de arbustos a causa de la construcción o de fallas en las líneas de alta tensión o en las líneas de distribución.
- Riesgos potenciales a bomberos luchando contra fuegos cerca de la servidumbre.
- Impactos potenciales a la salud pública a causa de helicópteros con cargas externas.

SERVICIOS PÚBLICOS Y UTILIDADES

- Impactos posibles durante actividades de construcción a causa del aumento de uso de recursos públicos, servicios, y utilidades.
- Impactos posibles durante construcción a causa de la generación de residuos y su disposición.
- Proyectos adicionales de líneas de alta tensión potenciales relacionados a los proyectos de energía renovable en el área del proyecto.

RECUSOS DE RECREACIÓN

- Impactos posibles en áreas con planificación establecido o pendiente para la conservación.
- Trastorno temporal a actividades de recreación en las áreas de recreación siguientes, entre otros: Parque Noble Creek Regional y Campo de Golf Oak Valley.
- Impactos potenciales a causa de cierres de rutas y aumento de tráfico durante actividades de construcción, que podrían impedir acceso a áreas de recreación.

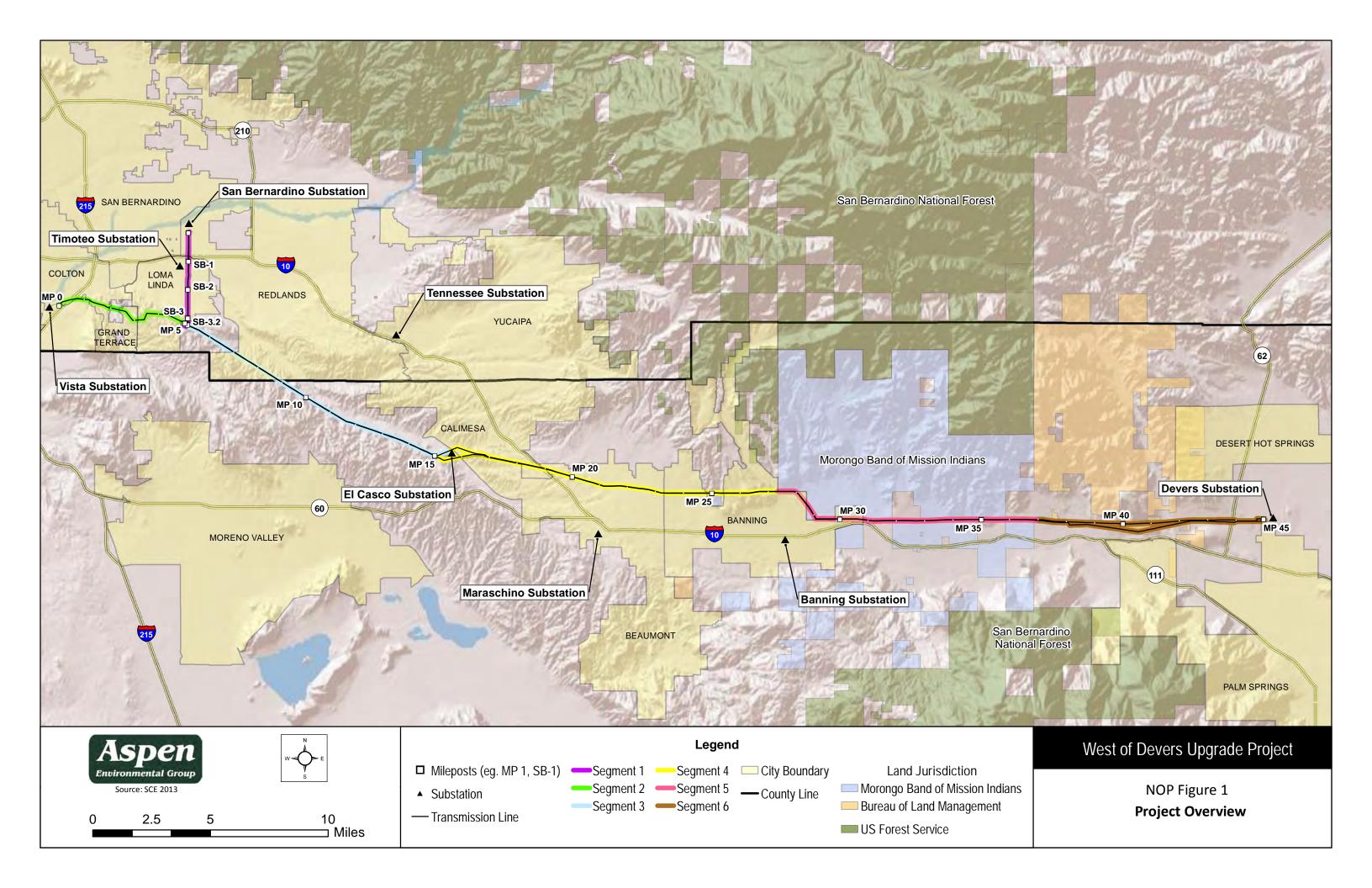
TRANSPORTACIÓN Y TRÁFICO

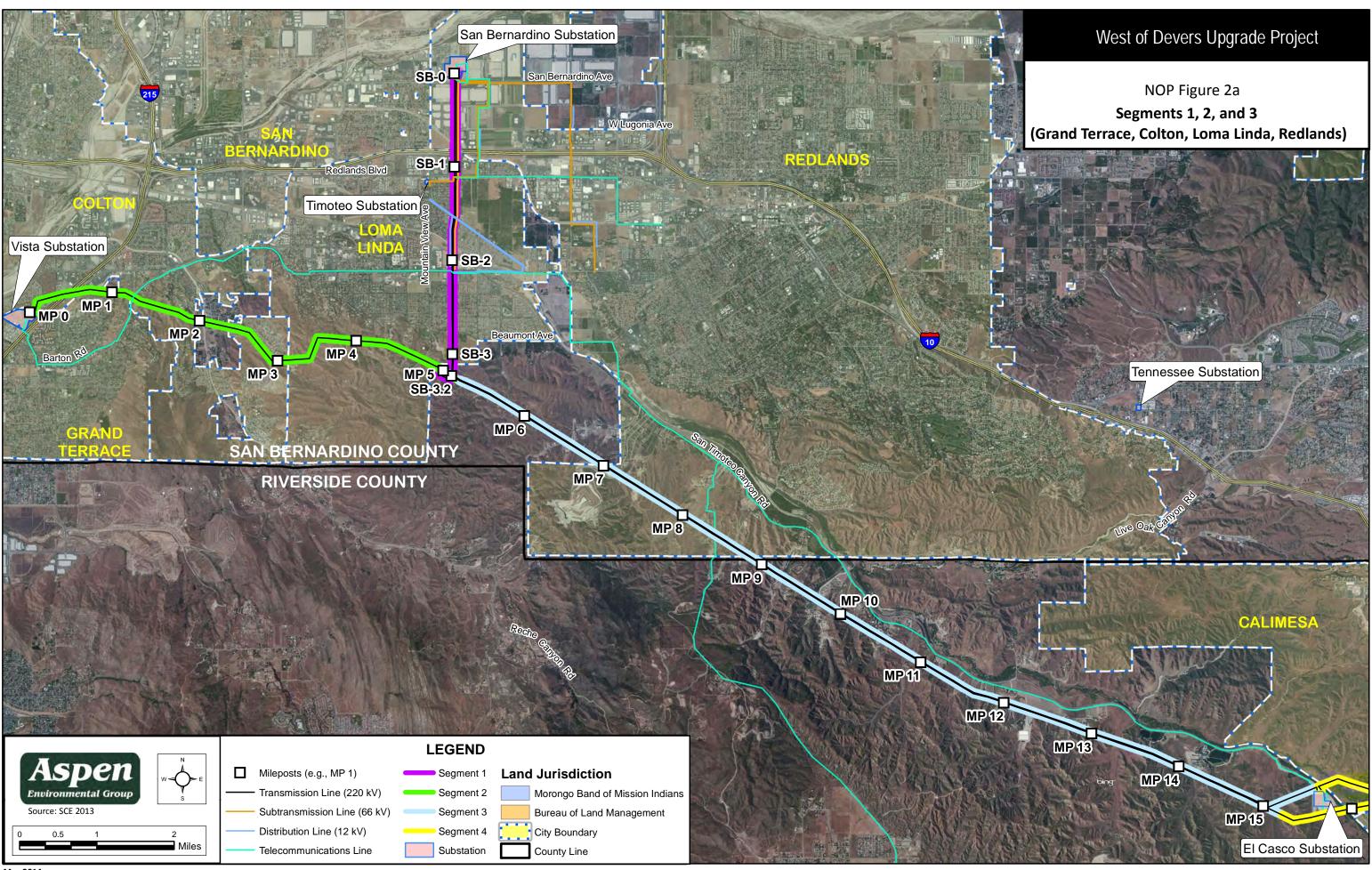
- Tráfico adicional en la vecindad de la línea de alta tensión propuesta.
- Cierre de rutas potenciales durante actividades de construcción, que podrían impedir acceso a áreas cerca del corredor de línea de alta tensión, incluyendo impedir acceso a bomberos o policía.
- Potencial de aumento de tráfico durante operación y mantenimiento de la línea de alta tensión.
- Eliminación de corto plazo de plazas de estacionamiento.
- Impactos potenciales conforme a requerimientos del FAA que limitan la altura de estructuras cerca a aeropuertos y señalamiento de peligros (por ejemplo, Aeropuerto de Banning).

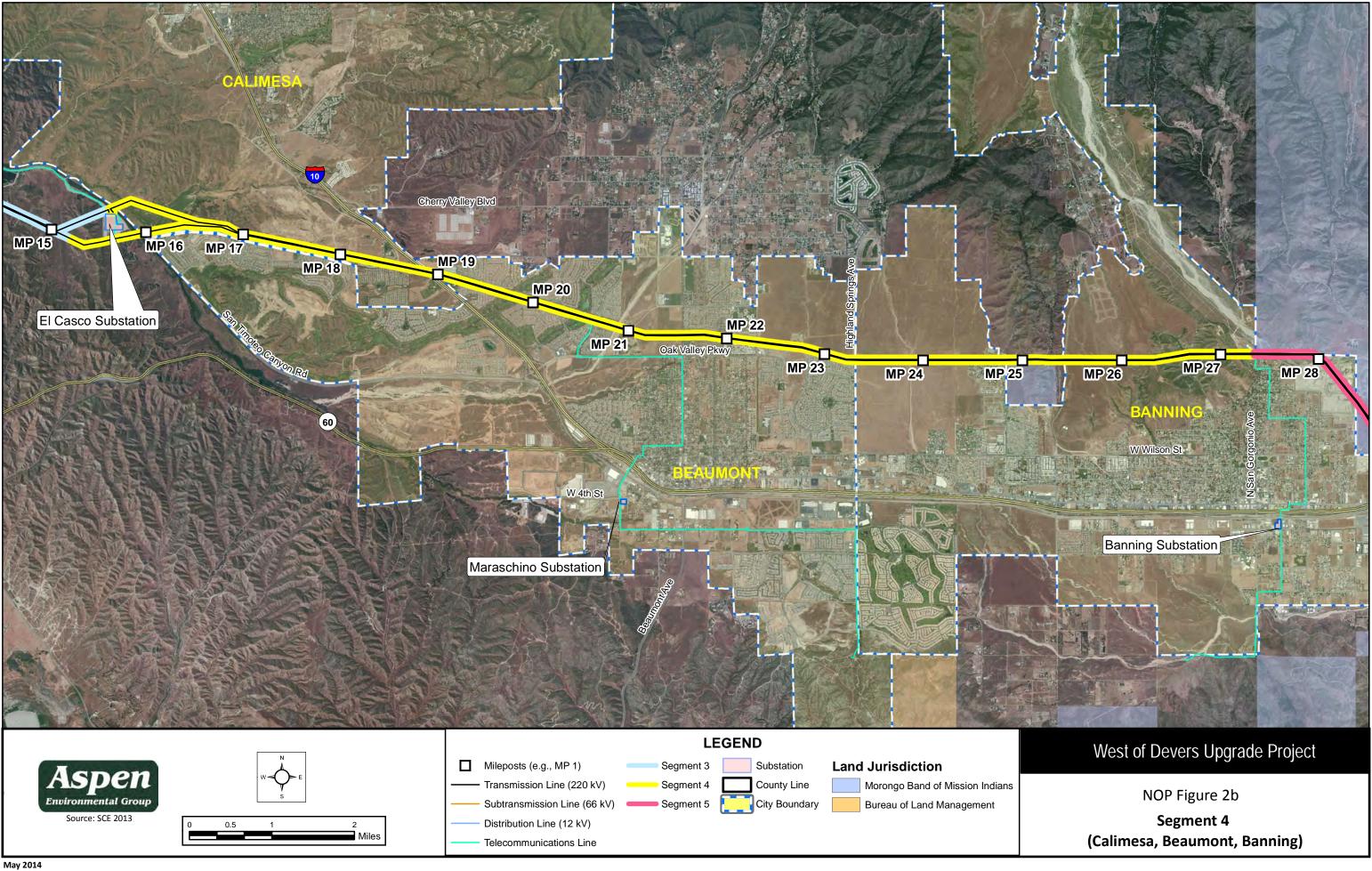
OTRAS ASUNTOS

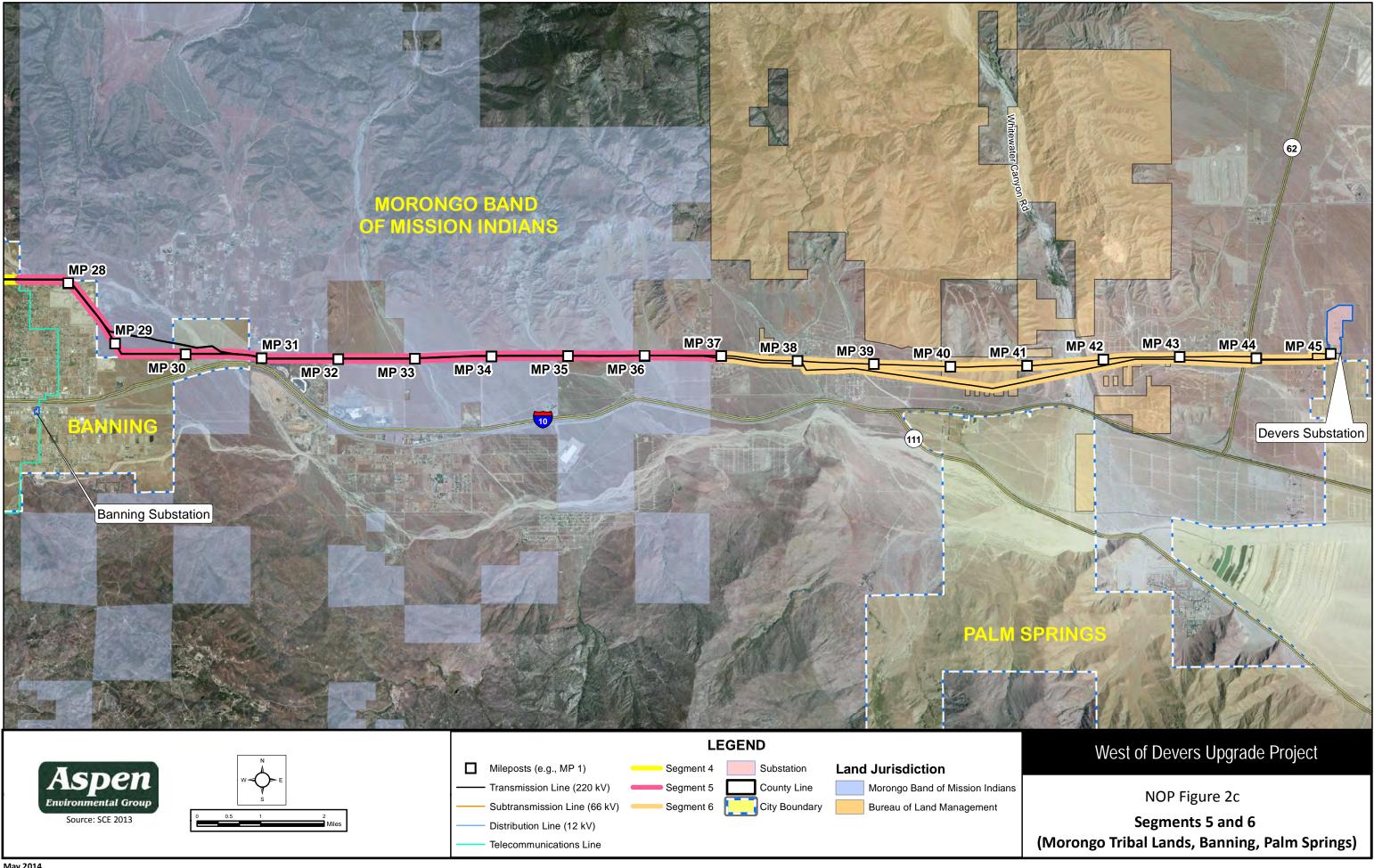
- Impactos Cumulativos, incluyendo posiblemente una línea de alta tensión futura en el corredor WOD.
- Efectos que inducen el desarrollo.
- Apropiado use de CEQA y NEPA, asegurando coordinación efectivo entre la CPUC, el BLM, y BIA.
- Consideración de un alcance razonable de alternativas.
- Medidas de mitigación efectivas y que se puede hacer cumplir.

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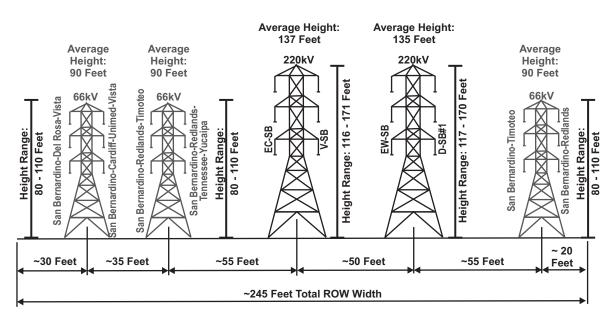




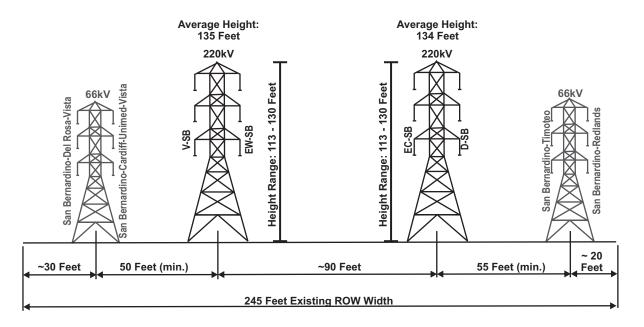




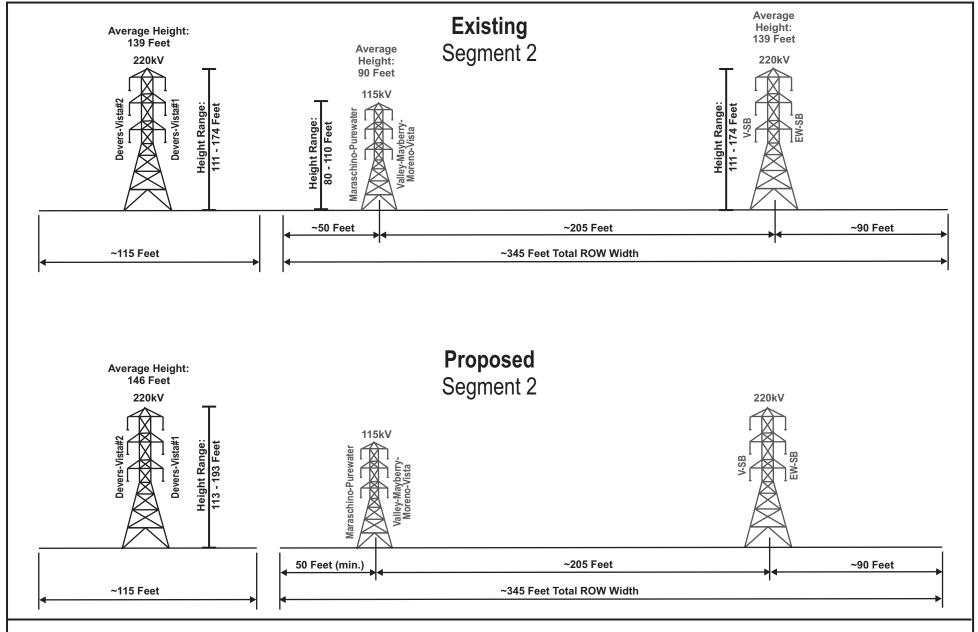




ProposedSegment 1









Source: SCE, 2013.

Figure 3b

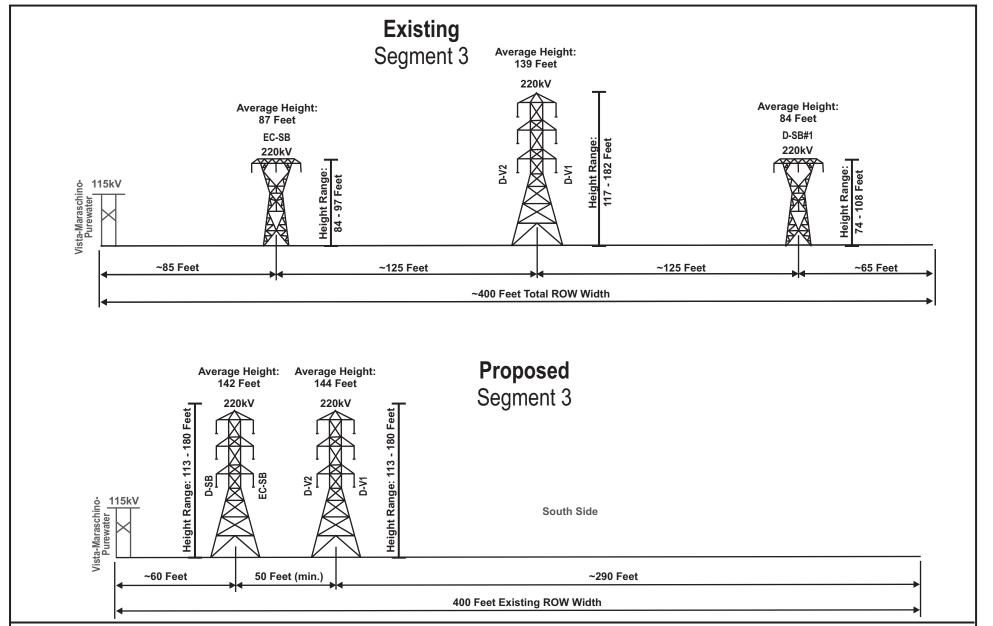




Figure 3c

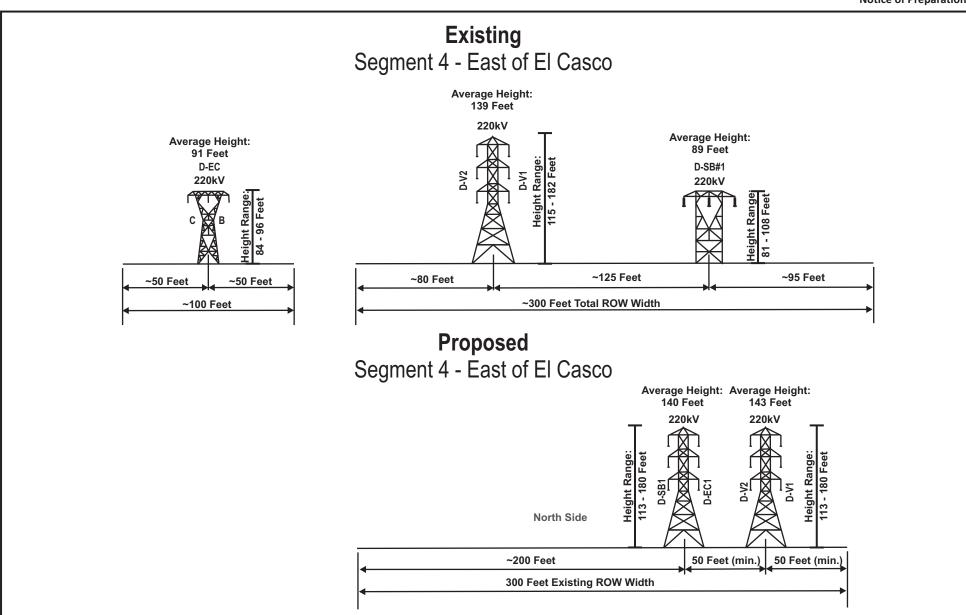
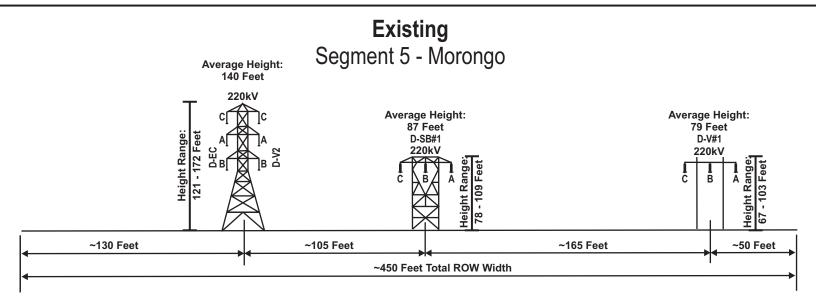


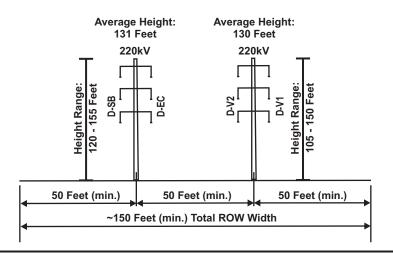


Figure 3d



Proposed (Current Design)

Segment 5A - Morongo



Proposed (Current Design)

Segment 5B - Morongo

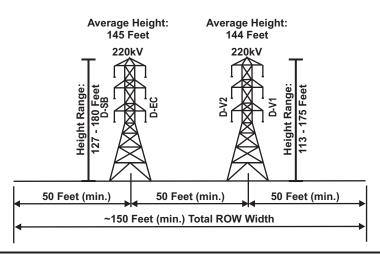
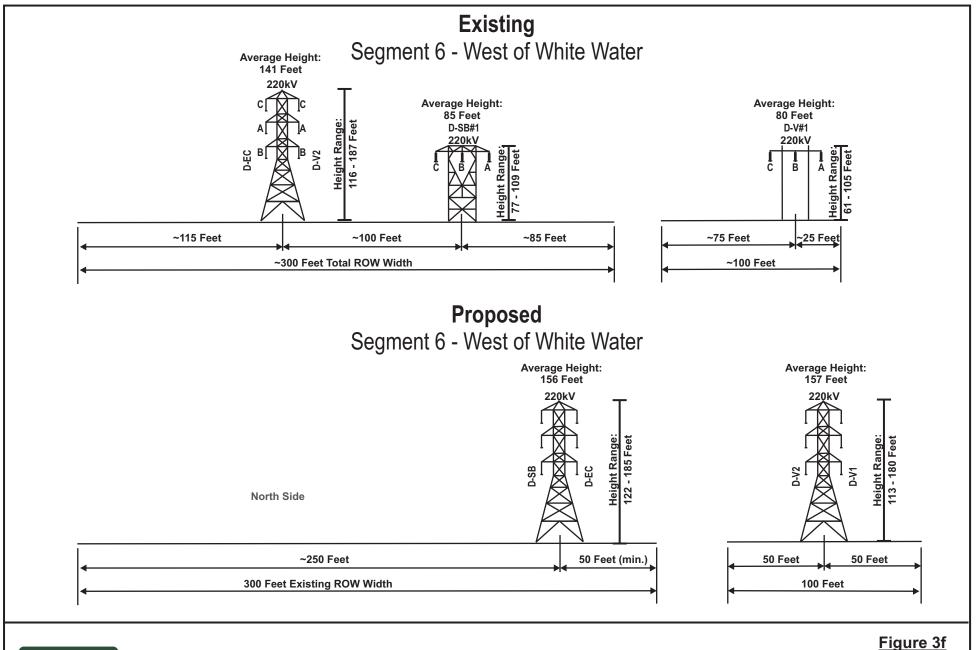




Figure 3e





Appendix B

Meeting Handouts and Information Materials

Appendix B-1

Scoping Meeting Presentation



SCE's Proposed West of Devers Upgrade Project



CPUC / BLM
Scoping Meeting
for preparation of a
Draft EIR/EIS



May 19-21, 2014

Meeting Participants & Agenda



- Introduction of Speakers; Agenda Summary Chester Britt, Arellano & Associates
- Purpose of Scoping Chester Britt
- Description of Proposed Project Susan Lee, Aspen
- CPUC Process and Schedule Billie Blanchard, CPUC
- BLM Process and Schedule John Kalish, BLM
- EIR/EIS Process Susan Lee
- Comments from the Public and Agencies

The Purpose of Scoping



- To inform the public and responsible agencies about an upcoming project for which an EIR/EIS will be prepared
- To inform the public about the environmental review process
- To solicit input regarding the potential alternatives to the proposed project and the appropriate scope of issues to be studied in the EIR/EIS
- To identify issues of concern and areas of potential controversy
- Scoping Report will be prepared and distributed to repositories, and placed on project website

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West of Devers Upgrade Project EIR/EIS

Key Players and their Roles in the CEQA/NEPA Process



- California Public Utilities Commission (CPUC): Lead Agency under California Environmental Quality Act (CEQA)
- Bureau of Land Management (BLM): Lead Agency under National Environmental Policy Act (NEPA)
- Southern California Edison Company (SCE): the Applicant
- Aspen Environmental Group: Environmental Consultant to the CPUC/BLM

Description of the Proposed Project: Transmission Components



Major elements of SCE's West of Devers Upgrade Project:

- Replacing existing 220 kV transmission lines with higher-capacity 220 kV transmission lines; removal of older existing towers
- Transmission line changes would occur over 45 miles.
- Construction could take 3 to 4 years; online in 2019

Segment	New Towers	Removed Towers	Segment	New Towers	Removed Towers
1. San Bernardino	61	45	4. Beaumont, Banning	136	175
2. Colton, Loma Linda	35	29	5. Morongo Tribal Lands	108	137
3. San Timoteo Canyon	133	116	6. Whitewater, Devers	93	116

San Bernardino Segment 2 San Bernardino County Riverside County Segment 1 Segment 4 Segment 3 Segment 5 Segment 6 Valley Existing Transmission Line Right of Way U.S. Bureau of Land Management Existing Transmission Line Right of Way to be Removed Seement 2 Proposed and Alternative Transmission Line Right of Ways Substations Segment 4

West of Devers Upgrade Project divides transmission line into 6 segments, numbered from west to east

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Description of the Proposed Project: Other Components



Major non-transmission elements of SCE's West of Devers Upgrade Project:

- Upgrade substation equipment at Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations
- Upgrade Timoteo and Tennessee 66/12 kV Substations to accommodate 66 kV subtransmission line relocations:
- Remove and relocate 2 miles of existing 66 kV subtransmission lines;
- Remove and relocate 4 miles of existing 12 kV distribution lines; and
- Install telecommunication lines and equipment for the protection, monitoring, and control of transmission lines and substation equipment.

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West of Devers Upgrade Project EIR/EIS

Morongo Tribal Investment Option



- SCE and Morongo Transmission LLC have executed a Development and Coordination Agreement (DCA) which provides for an option to lease electricity transfer capability in the WOD transmission line
- This option was a key factor in the negotiation of the ROW agreement between SCE and Morongo to permit continued operation of existing and proposed upgrades on Morongo Land
- The option is exercisable at the commercial operation date of the project
- Approvals for the transaction are required from FERC and the CPUC before the option may be exercised

Need for the Proposed West of Devers Upgrade Project



SCE's major objective for the West of Devers Upgrade Project is to increase the now-limited electricity transfer capacity into the LA Basin from the desert.

Specifically, SCE states that the project would:

- 1. Allow SCE to fully deliver the output of new generation projects located in the Blythe and Desert Center areas.
- 2. Maximize the use of existing transmission line rights-of-way consistent with prudent transmission planning.
- 3. Meet project need while minimizing environmental impacts.
- 4. Facilitate progress toward achieving California's RPS goals.
- 5. Comply with applicable Reliability Standards and SCE's approved design, and construction standards.
- 6. Construct facilities in a timely and cost-effective manner by minimizing service interruptions to the extent practicable.

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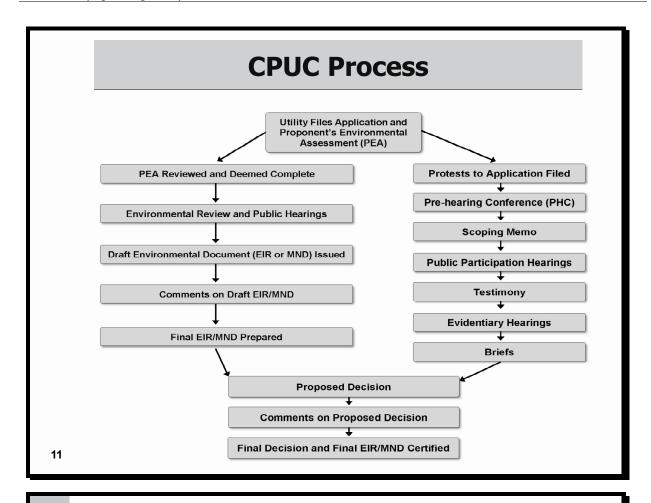
West of Devers Upgrade Project EIR/EIS

CPUC Review Process



The CPUC has two parallel review processes for this SCE Application for a Certificate of Public Convenience and Necessity (CPCN):

- General Proceeding: Applications # A.13-10-020
- Environmental Review: the CEQA/NEPA process



General Proceeding for Certificate of Public Convenience and Necessity (CPCN)



Led by:

 Assigned Commissioner Michael Peevey and Administrative Law Judge Jessica Hecht

Scope (defined by Public Utilities Code Section 1002):

- Determine need for the project (facilities are necessary to promote the safety, health, comfort, and convenience of the public)
- Consider community values, recreational and park areas, historic and aesthetic values
- Review environmental impacts as required by the California Environmental Quality Act (CEQA)

CPUC General Proceeding



CPUC General Proceeding Schedule				
First Pre-Hearing Conference	After Release of Draft EIR/EIS			
Second Prehearing Conference and Public Participation Hearing	To be determined by ALJ			
Scoping Memo for General Proceeding	After pre-hearing conference, as determined by ALJ			
Testimony Exchanged	To be determined by ALJ			
Evidentiary Hearings	To be determined by ALJ			
ALJ's Proposed Decision	To be determined by ALJ			
Final Decision by CPUC	To be determined by ALJ			

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West of Devers Upgrade Project EIR/EIS

Environmental Review Schedule: CEQA



SCE filed CPCN Application and Proponent's Environmental Assessment	October 25, 2013	
Notice of Preparation for EIR	May 12, 2014	
CEQA Public Scoping for EIR/EIS	May 12 – June 12, 2014	
Public Review of Draft EIR/EIS ■ 45-day Comment Period ■ Public Consultation	Estimated Fall 2014	
Final EIR/EIS	Early 2015	
EIR Certified by CPUC	Spring 2015	

BLM Process



- SCE filed BLM Plan of Development for project on March 7, 2014
- A revised ROW must be granted to cross BLMadministered lands:
 - 1.1 linear miles in Riverside County and access roads
- Nation to Nation Consultation Process with interested tribes
- Notice of Intent to Prepare an EIS will be published in Federal Register
 - BLM will hold an additional scoping meeting within another 30 day scoping period: likely June/July 2014

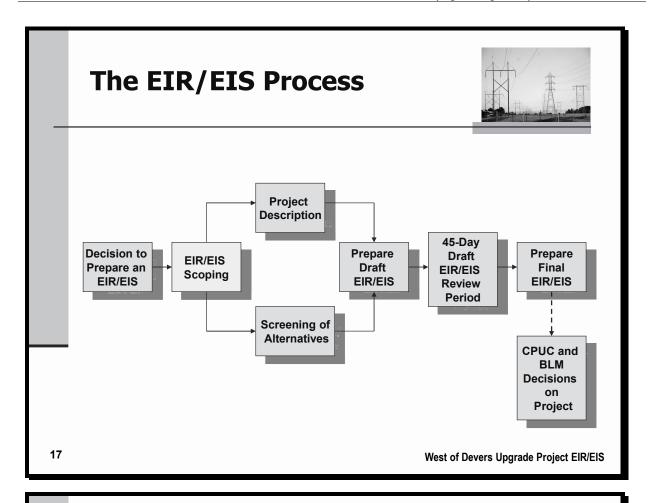
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West of Devers Upgrade Project EIR/EIS

Other Key Agencies and Tribes



- Cities and Counties along the route
 - Riverside & San Bernardino Counties
 - Cities of Banning, Beaumont, Calimesa, Redlands, Loma Linda, Grand Terrace, Colton
- Morongo Band of Mission Indians
- Other interested tribes
- U.S. Bureau of Indian Affairs
- U.S. Fish & Wildlife Service
- CA Department of Fish & Wildlife
- CA State Historic Preservation Office



General Contents and Purpose of an EIR/EIS



Contents:

- Describe the environmental setting of the project area
- Disclose the potential environmental impacts of the project and alternatives
- Propose measures to reduce or avoid significant environmental impacts (mitigation measures)

Purpose:

Provide technically sound information for decision-makers to consider in evaluating the proposed project

Major Elements of an EIR/EIS



- Detailed Project Description
- Description of Alternatives Screening Process and Alternatives Carried Forward
- Impacts of Proposed Project
- Impacts of Alternatives
- Mitigation Measures
- Cumulative Impacts, Indirect Impacts, Growth Inducing Effects
- Mitigation Monitoring

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West of Devers Upgrade Project EIR/EIS

Environmental Disciplines Included in an EIR/EIS



- Aesthetics
- Agriculture
- Air Quality
- Biological Resources
- Cultural Resources
- Environmental Justice
- Geology & Soils
- Hydrology & Water Quality

- Land Use
- Noise
- Paleontology
- Public Health & Safety
- Recreation
- Socioeconomics
- Transportation & Traffic
- Utilities

Alternatives Analysis



Reasonable range of alternatives determined by:

- Consistency with most project objectives
 - Meeting all objectives is not required
- Ability to reduce or avoid impacts of proposed project
 - Scoping comments will help identify impacts
- Feasibility
 - Technical concerns (can it be built?)
 - Regulatory feasibility (could it be permitted?)
 - Legal issues (would it be allowed under law?)

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West of Devers Upgrade Project EIR/EIS

Alternatives Analysis



Screening of alternatives analysis will include consideration of:

- Transmission design and location alternatives within existing right-of-way
- Reconsideration of SCE's PEA alternatives
- Reconsideration of alternatives eliminated by SCE
- Alternatives suggested in scoping comments

After EIR/EIS Completion



CPUC:

- Commission will vote on the project
- EIR is referenced in the Decision
- If the project or an alternative is approved, the Decision will require monitoring of adopted mitigation measures and definition of mitigation monitoring procedures.

BLM:

- 30-day comment/protest period following publication of Final EIR/EIS
- Prepare Record of Decision

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West of Devers Upgrade Project EIR/EIS

EIR/EIS Scoping Comments



The most useful scoping comments —

- Identify the location and extent of environmental impacts of the proposed project.
- Recommend alternatives that would avoid or reduce impacts of the proposed project.

Written Scoping Comments For CPUC Scoping Must be Postmarked by June 12, 2014



Please send comments to:

Billie Blanchard (CPUC) / Brian Paul (BLM)

c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104

or

E-mail: westofdevers@aspeneg.com Fax: (888) 456-0254

Please be sure to include your name, address, and phone number on all comments.

Reminder: An additional Scoping Period will be held by BLM in June or July 2014.

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West of Devers Upgrade Project EIR/EIS

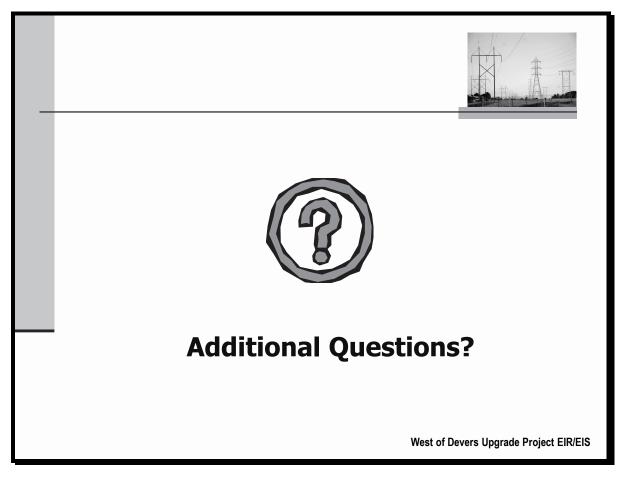
For More Information:



Check our website:

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

- Information Repositories: 15 area libraries and offices have project information
- E-mail us at: westofdevers@aspeneg.com
- Call the Project Information Line: (888) 456-0254 (voice or fax)





Appendix B-2

Scoping Meeting Materials

Comment Form

inspection in their entirety.

West of Devers Upgrade Project Riverside and San Bernardino Counties



Date:	
Date	
Name*:	
Affiliation (<i>if any</i>):*	
Address:*	
City, State, Zip Code:*	
Telephone Number:*	
Email:*	
Comment:*	
Please send me notifications by: email mail	I do not want to be on the project mailing list

Your comments will help determine the scope and content of the environmental document and identify alternatives and measures to reduce impacts. Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please submit comments by June 12, 2014. You may also submit comments by email to westofdevers@aspeneg.com or by phone (888) 456-0254.

state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public

Place Postage Here

Billie Blanchard (CPUC PM)/Brian Paul (BLM PM)
California Public Utilities Commission and
Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Speaker Registration Card

(Please Print)
Name:
Affiliation (if any):
Address:
City, State, and Zip:
Phone:
Email:

Speaker Registration Card

(Please Print)
Name:
Affiliation (if any):
Address:
City, State, and Zip:
Phone:
Email:

West of Devers Upgrade Project

Tower Height

The West of Devers Upgrade Project requires removal of existing transmission towers and construction of new stronger towers to carry the heavier conductors that can carry more electricity. Table 1 presents the range of tower height within each existing segment and the average height of existing towers. In the last column, the table presents the range and average height of the proposed new towers. Note that the segment numbers and locations are defined on pages 2 and 3 of this document.

Table 1. WOD Upgrade Project - Height of Existing and Proposed Towers

Seg- ment No.	EXISTING 220 kV Single Circuit Towers **		EXISTING 220 kV Double Circuit Towers		PROPOSED NEW 220 kV Double-Circuit Towers	
	Range of <u>Existing</u> Tower Height	Average Existing Tower Height	Range of <u>Existing</u> Tower Height	Average <u>Existing</u> Tower Height	Range of <u>Proposed</u> Tower Height	Average <u>Proposed</u> Tower Height
1	none	none	116' - 170'	136 feet	65' – 180'	134 feet
2	none	none	111' - 174'	139 feet	113' – 193'	146 feet
3	73' – 108'	86 feet	116' - 182'	139 feet	112' – 180'	143 feet
4	47' – 108'	84 feet	115' - 182'	139 feet	113' – 180'	141 feet
5	53' – 117'	84 feet	121' - 171'	140 feet	105′ – 180′	140 feet
6	61' – 109'	82 feet	115' - 187'	141 feet	113′ – 185′	156 feet

^{**} All existing single circuit towers are proposed to be replaced with double circuit towers.

Schedule for CEQA/NEPA Process

Table 2 presents a preliminary schedule for issuance of the Draft and Final EIR/EIS that will evaluate the environmental impacts of the project proposed by SCE. The first step in the process will be public scoping, when the lead agencies will reach out to the public, appropriate local and regional agencies, and tribal governments. Concurrently, the BLM is beginning its process for outreach to Native American tribes as part of Section 106 of the National Historic Preservation Act.

Table 2. Proposed EIR/EIS Schedule

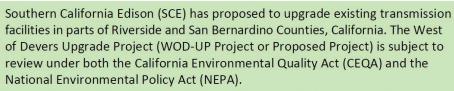
CEQA/NEPA Process Steps	Timeframe
Scoping and Agency Outreach	Spring 2014
Draft EIR/EIS	Late 2014
Public Comments on Draft EIR/EIS	Late 2014
Final EIR/EIS	Early 2015
Agency Decisions	Early 2015
Construction	2016 to 2020



Fact Sheet

West of Devers Upgrade Project

Riverside and San Bernardino Counties



The environmental review of the WOD-UP Project is being managed by the California Public Utilities Commission (CPUC) and the United States Department of the Interior, Bureau of Land Management (BLM). The CPUC, as the lead agency under CEQA, and the BLM, as the lead agency under NEPA, will prepare and publish a Draft and Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) in compliance with CEQA and NEPA requirements.

Project Overview

If the Proposed Project is approved, 618 existing 220 kilovolt (kV) towers would be removed and two sets of 220 kV double-circuit towers would be constructed in the existing 48-mile corridor. As shown on the map on the following page, these lines interconnect the following substations:

- Devers Substation (North Palm Springs)
- El Casco Substation (Riverside County)
- Etiwanda Substation (San Bernardino)
- San Bernardino Substation (San Bernardino)
- Vista Substation (Colton).

Other project elements include:

- Upgrades of smaller subtransmission lines and improvements at the Timoteo and Tennessee substations
- Installation of telecommunication lines and equipment for the protection, monitoring, and control of transmission lines and substation equipment.



Project History

SCE previously proposed to upgrade these transmission lines in April of 2005, as part of an SCE application for a new 500 kilovolt (kV) interstate transmission line project in Arizona and California known as the Devers–Palo Verde No. 2 (DPV2) Project. As proposed in 2005, the DPV2 project had three major components:

- A 500 kV transmission line from Arizona to Blythe, California
- A 500 kV line from Blythe to Devers Substation north of Palm Springs
- Upgrades to SCE's 220 kV transmission system west of Devers Substation.





The CPUC and BLM approved the proposed DPV2 Project in January 2007, except for the West of Devers Upgrades. The upgrades were replaced by an alternative 500 kV transmission segment between the Devers and Valley Substations. The proposed 220 kV West of Devers components could not be approved by the CPUC and BLM because at the time of agency decisions the Morongo Band of Mission Indians had not reached an agreement with SCE regarding the renewal of the right-of-way (ROW) for the segment of the corridor crossing tribal land.

In May 2008, SCE modified the approved project so it would extend only from a new Colorado River Substation near Blythe to the Devers Substation and then onto the Valley Substation in Romoland. The modified project was approved and it has been constructed. The new transmission line was energized in 2013.

Current Project Details

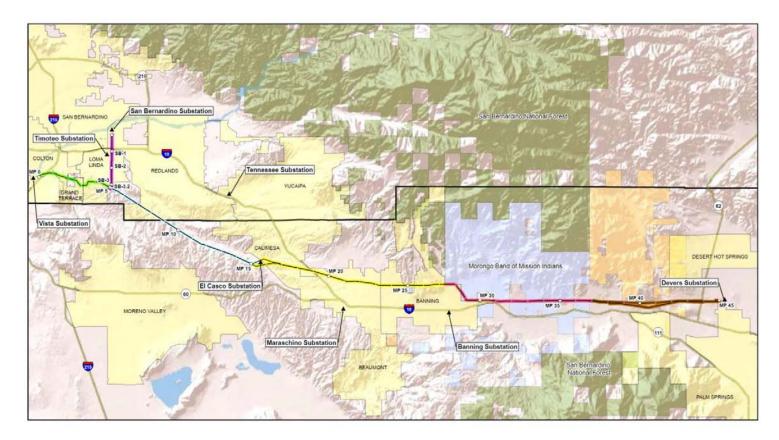
In 2013, SCE and the Morongo Band agreed on terms for ROW renewal for the portion of transmission corridor on Morongo tribal land. According to SCE, the Proposed Project is needed to facilitate delivery of new electric power into the greater Los Angeles area by increasing the capacity of the transmission system. The Proposed Project would facilitate progress towards meeting California's Renewable Portfolio Standard goals requiring utilities to produce 33% of their electricity sales from renewable energy sources by 2020.

For additional information on the WOD-UP Project, and a schedule of public meetings, please check the CPUC project website at:

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

Alternatively, you can call the project hotline at (888) 456-0254 or send an e-mail to the project team at westofdevers@aspeneg.com.

Spring 2014 Spring 2014



Project Overview

The Project would be located primarily within the existing West of Devers transmission right-of-way (ROW) in Riverside and San Bernardino Counties. The ROW crosses unincorporated county lands, reservation trust land of the Morongo Band of Mission Indians, and the Cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, Palm Springs, Rancho Cucamonga, Redlands, San Bernardino, and Yucaipa (see map).

The existing 220 kV transmission lines are supported by a mix of lattice steel towers, tubular steel poles, and wood pole structures.

Over 600 tower structures would be removed as part of the Project. These would be replaced with about 560 new structures.

The Project is divided into six segments, as shown on the map above. The segments are described in the following paragraphs, starting at the west end of the corridor. Additional detail on each segment is available on the project website (see page 1).

Segment 1: San Bernardino

This segment is 3.5 miles long and connects the San Bernardino Junction (where the transmission corridor from the east splits into two separate routes) with the existing SCE San Bernardino Substation. It passes through the Cities of San Bernardino, Redlands, and Loma Linda.



Transmission line work within Segment 1 would include removal of approximately 45 double circuit towers (average height 136 feet) and installation of 61 towers (average height 135 feet), within the existing ROW.

Also within Segment 1, SCE would relocate some lower voltage 66 kV lines to allow for construction space in the ROW, and install new telecommunications lines on existing wood or steel poles.

Segment 2: Colton and Loma Linda

Segment 2 connects the Vista Substation (located adjacent to I-215 at Newport Avenue in Grand Terrace), the westernmost point of the Project, with the San Bernardino Junction.



Within this segment, one double-circuit tower line would be removed. It would be replaced in the same corridor along an approximately 5-mile segment, passing through the Cities of Colton, Grand Terrace, and Loma Linda.

Project work within Segment 2 would include removal of 29 double-circuit towers (average height 139 feet) and installation of 35 towers (average height 146 feet).

Segment 3: San Timoteo Canyon

Segment 3 extends east from the Loma Linda area, through San Timoteo Canyon. Approximately 10 miles long, the segment ends at SCE's existing El Casco Substation, located on San Timoteo Canyon Road just west of Beaumont.



Segment 3 includes three separate sets of existing towers that would be removed and replaced with two sets of new 220 kV double circuit towers. Project work within Segment 3 would include removal of 116 towers (average height 86 feet for single-circuit towers and 139 feet for double-circuit towers) and Installation of 133 towers (average height 143 feet).

Segment 4: Beaumont and Banning

Segment 4 is about 12 miles long, extending east from El Casco Substation through Beaumont, to San Gorgonio Avenue at the eastern edge of the City of Banning.



Project work in this segment would require removal and replacement of three existing 220 kV transmission lines. This includes removal of 175 towers (average height 90 feet for single circuit towers and 139 feet for double circuit towers) and installation of 136 new towers (average height 142 feet).

Segment 5: Morongo Tribal Lands and Vicinity

Segment 5 extends east approximately 9 miles from San Gorgonio Avenue in Banning to the eastern limit of the Morongo Indian Reservation at Rushmore Avenue in the San Gorgonio Pass. About 3 miles of the existing ROW through the Morongo Indian Reservation would be abandoned and replaced with a new relocated 3-mile alignment pursuant to an SCE-Morongo ROW agreement. Project work within Segment 5 would include removal of 137 towers



(average height 83 feet for single-circuit towers and 140 feet for double circuit towers) and installation of 108 towers (average height 144 feet).

Segment 6: Whitewater and Devers Substation

Segment 6 extends east from the Morongo Indian Reservation to SCE's existing Devers Substation, north of Palm Springs. This segment includes



removal of 116 transmission towers (average height 83 feet for single-circuit towers and 141 feet for double-circuit towers) and installation of 93 new towers (average height 157 feet). The new towers would interconnect at the Devers Substation.

Frequently Asked Questions

West of Devers Upgrade Project

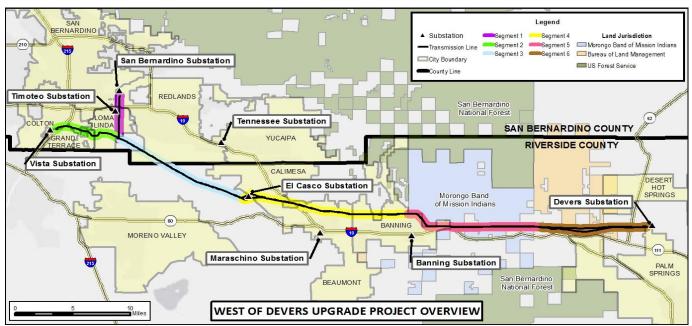




What is the West of Devers (WOD) Upgrade Project?

Southern California Edison Company (SCE) has filed an application for a Certificate of Public Convenience and Necessity (CPCN) with the California Public Utilities Commission (CPUC) for the WOD Upgrade Project (project). This project would increase the power transfer capability of WOD's transmission lines between the Devers, El Casco, Vista, and San Bernardino substations. It would accomplish this by: replacing existing 220 kilovolt (kV) transmission lines and associated structures with new, higher-capacity 220 kV transmission lines and structures; modifying existing substation facilities; removing and relocating existing sub-transmission (66 kV) lines; removing and relocating existing distribution (12 kV) lines; and making various telecommunication improvements.

The project would be located primarily within the existing 48-mile WOD electrical transmission corridor. The project corridor crosses unincorporated areas of Riverside and San Bernardino Counties, reservation trust land of the Morongo Band of Mission Indians, and the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, Palm Springs, Rancho Cucamonga, Redlands, San Bernardino, and Yucaipa. The existing WOD corridor traverses a combination of residential, commercial, agricultural, recreational, and open space land uses.



Why is the WOD Upgrade project needed?

As identified in SCE's application to the CPUC, the project would facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County. As renewable energy generating facilities come on-line in eastern Riverside County, the project would allow the transfer of this electricity into the Los Angeles area, and would facilitate progress towards meeting California's Renewable Portfolio Standard goals. These goals require utilities to produce 33 percent of their electricity sales from renewable energy sources by 2020.

What agencies will review the project and what are their roles?

The CPUC and the United States Department of Interior, Bureau of Land Management (BLM) have determined an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) will be prepared to evaluate and document the project's impact on the environment. The CPUC as the state lead agency under the California Environmental Quality Act (CEQA) and the BLM as the federal lead agency under the National Environmental Policy Act (NEPA) will prepare the WOD Upgrade Project EIR/EIS consistent with procedural and content requirements identified in CEQA and NEPA.

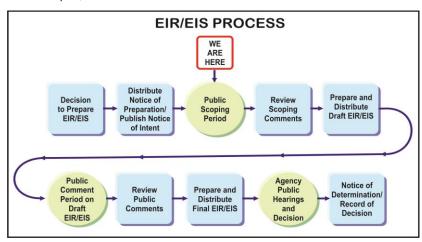
What is meant by "scoping"?

Consistent with CEQA/NEPA requirements, scoping is a 30-day period of time where a lead agency provides an early opportunity for members of the public and agencies to provide input on the scope and content of the EIR/EIS. Typically, projects have one public scoping period; this project will include two separate 30-day scoping periods. The CPUC has begun its scoping process by releasing a Notice of Preparation in early May 2014, which announced the intention to prepare an EIR on the project and started a 30-day scoping period. Four public scoping meetings will be held in mid-May for this scoping period. When the BLM publishes the Notice of Intent to prepare an EIS, there will be another 30-day scoping period and an additional public scoping meeting will be held for this project.

West of Devers Upgrade Project

What are the key steps in preparing an EIR/EIS?

The CPUC and BLM will prepare a Draft and Final EIR/EIS to evaluate and disclose potential environmental effects of the project, address public concerns, and to propose mitigation measures to reduce any potentially significant effects. The EIR/EIS Process (below) provides an overview of the key milestones and opportunities for public input during the environmental review process for the project. As noted above, scoping meetings will be held to initiate the study process and provide an opportunity to collect initial public and agency input. Public workshops will be held later in the process to present an overview of the results of the Draft EIR/EIS and to document public and agency comments on the draft report, which will be included in the Final EIR/EIS.



What kind of information is included in the EIR/EIS?

The EIR/EIS will include a comprehensive description of the project and project alternatives, and will evaluate the project's impact on the environment. The purpose of the EIR/EIS is to provide an evaluation of impacts associated with the project, and to inform decision-makers and the public of reasonable alternatives, if any, that could avoid or minimize these adverse impacts. It will address issues such as traffic, air quality, noise, visual, and construction impacts. The EIR/EIS will also evaluate cumulative impacts of the project in combination with other present and planned projects in the area.

What impacts will this project have on the environment?

No determinations have yet been made as to the significance of potential impacts; such determinations will be made in the environmental analysis conducted in the EIR/EIS after the issues are considered thoroughly. Refer to the Notice of Preparation for a preliminary indication of the potential environmental issues associated with the project.

What mitigation measures are being considered? How will environmental impacts be minimized?

In its application to the CPUC and BLM, SCE has proposed measures that could reduce or eliminate potential impacts of the proposed project. The effectiveness of these measures (referenced as "applicant proposed measures") will be evaluated in the EIR/EIS, and additional measures ("mitigation measures") will be developed to further reduce impacts, if required. When the CPUC and BLM make their final decision on the project, they will define the mitigation measures to be adopted as a condition of project approval, and the CPUC will require implementation of a mitigation monitoring program.

What alternatives are being considered for the proposed project?

State and federal environmental laws require the evaluation of a reasonable range of alternatives. The EIR/EIS will evaluate alternatives to the project that would feasibly attain most of the project objectives and would avoid or substantially lessen significant effects of the project. Alternatives may include minor reroutes and different structure designs within the ROW, different routes for the transmission lines (in other corridors), and new transmission and substation facilities and/or equipment that could meet the electric system need and project objectives. Additionally, a No Project/No Action Alternative must also be analyzed in the EIR/EIS to assess the results in the absence of the project. Further, the EIR/EIS must evaluate the comparative merits of each of the alternatives.

How can the public be involved during the scoping process?

During the scoping period, the CPUC and BLM are soliciting information regarding the topics and alternatives that should be included in the EIR/EIS. The CPUC and BLM are committed to a comprehensive outreach program that provides stakeholders with the tools and resources to be informed regarding key project milestones as well as encourages public input in the process. All comments for the CPUC's CEQA scoping period must be received by June 12, 2014. The following are ways to submit comments on the project:

Mail: Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager); California Public Utilities Commission & Bureau of Land Management; c/o Aspen Environmental Group; 235 Montgomery Street, Suite 935; San Francisco, CA 94104-3002

Electronic Mail: westofdevers@aspeneg.com

Fax and Voicemail: (888) 456-0254

Where can I get more information?

Visit the project website at: http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm

Preguntas Más Frecuentes

Proyecto de Mejoramiento West of Devers Condados de Riverside y San Bernardino

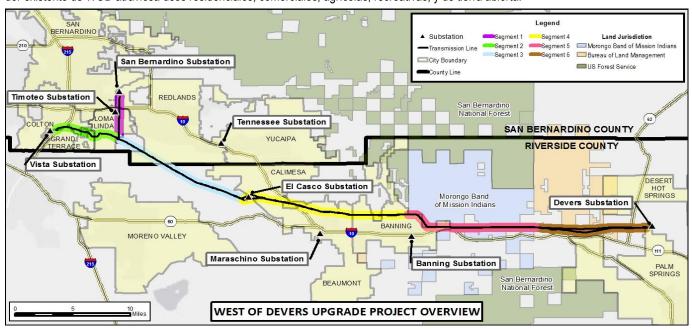




Qué es el Proyecto de Mejoramiento West of Devers (WOD)?

La Compañía Southern California Edison (SCE) ha presentado una aplicación para un Certificado de Conveniencia y Necesidad Pública (CPCN) con la Comisión de Servicios Públicos de California (CPUC) para el Proyecto de Mejoramiento West of Devers (proyecto). Este proyecto aumentará la capacidad de transferir energía de las líneas de alta tensión de WOD entre las subestaciones Devers, El Casco, Vista, y San Bernardino. Logrará esto por reemplazar las líneas de 220 kilovoltios (kV) existentes y las torres asociadas con líneas de alta tensión nuevas de 220 kV de alta-capacidad y estructuras; modificando subestaciones existentes; eliminando y trasladando líneas de 66 kV existentes, eliminando y trasladando líneas de distribución (12 kV); y haciendo mejoramientos a componentes de telecomunicación.

El proyecto se localiza mayormente dentro del corredor existente de WOD de 48-millas. El corredor del proyecto cruza áreas no incorporadas de los Condados de Riverside y San Bernardino, tierra en reserva de los *Morongo Band of Mission Indians*, y las cuidades de Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, Palm Springs, Rancho Cucamonga, Redlands, San Bernardino, y Yucaipa. El corredor existente de WOD atraviesa usos residenciales, comerciales, agrícolas, recreativas, y de tierra abierta.



Por qué se necesita el Proyecto de Mejoramiento WOD?

Como indica la aplicación de SCE a la CPUC, el proyecto facilitará la entrega de los recursos eléctricos que se desarrolla en la parte este de Condado Riverside. En cuanto proyectos de generación de energía renovable sean completados en el Condado de Riverside, el proyecto permitirá la transferencia de electricidad al área de Los Ángeles, y facilitará progreso a alcanzar los objetivos de California para energía renovable. Estos metas requieren que servicio públicos producen 33 por ciento de las ventas por energía renovable antes de 2020.

Cuáles agencias revisarán el proyecto y qué son sus roles?

La CPUC y el Departamento Interior de Los Estados Unidos, Departamento de Manejo de Tierras (BLM) han determinados que un Informe de Impacto Ambiental/ Declaración de Impacto Ambiental (EIR/EIS) será preparado para evaluar y documentar los impactos ambientales del proyecto. La CPUC como agencia líder bajo la Ley de Calidad Ambienta de California (CEQA) y el BLM como agencia líder bajo la Ley Nacional de Política Ambienta (NEPA) prepararán el Proyecto de Mejoramiento WOD EIR/EIS consistente con los requerimientos de proceso y contenido identificados por CEQA y NEPA.

Qué significa "scoping"?

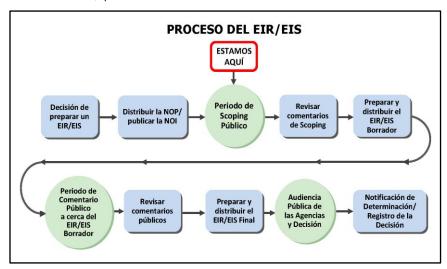
Consistente con las reglas de CEQA/NEPA, *scoping* es un periodo de 30 días en que la agencia líder ofrece una oportunidad por delante a miembros del público y a agencias para ofrecer información sobre el enfoque y contenido del EIR/EIS. Normalmente, proyectos tienen un periodo de *scoping*; este proyecto incluye dos periodos distintos. La CPUC ha comenzado su proceso de *scoping* con la publicación de la Notificación de Preparación en el comienzo de Mayo 2014, que anunció su intento para preparar un EIR para el proyecto y comenzó su periodo de 30 días. Se realizarán cuatro reuniones públicas a medio de Mayo para este periodo de *scoping*. Cuando el BLM publica la Notificación de Intento para preparar un EIS, habrá otro periodo de *scoping* de 30 días y habrá otra reunión pública para este proyecto.

Cuáles son los pasos claves para preparar un EIR/EIS?

La CPUC y el BLM prepararán un EIR/EIS Borrador y Final para evaluar y revelar los efectos ambientales del proyecto, responder a preocupaciones públicos, y proponer medidas de mitigación para reducir impactos potenciales significativos. El Proceso de EIR/EIS provee una visión

Proyecto de Mejoramiento West of Devers

de las etapas principales y oportunidades para contribuir al proceso de reviso ambiental del proyecto. Las reuniones públicas iniciarán el proceso de estudio y ofrecerán una oportunidad para coleccionar información público y de agencias. Se ofrecerán talleres públicos más tarde para presentar un resumen de los resultados del EIR/EIS Borrador y para documentar los comentarios públicos y de agencias sobre el EIR/EIS Borrador, que serán incluidos en el EIR/EIS Final.



Qué tipo de información se incluye en un EIR/EIS?

Un EIR/EIS incluye una descripción comprehensiva del proyecto y alternativas y evaluará los impactos del proyecto sobre el medio ambiente. El propósito del EIR/EIS es proveer una evaluación de impactos asociados con el proyecto, y para informar las agencias responsables y el público de alternativas razonables, si existen, que podrían evitar o minimizar los impactos negativos. El EIR/EIS se dirigirá a temas como tráfico, calidad de aire, ruido, impactos visuales, e impactos de construcción. También evaluará impactos cumulativos del proyecto en combinación con otros proyectos presentes y planeados en el área.

Qué impactos tendrá este proyecto sobre el medio ambiente?

No se ha hecho ninguna determinación a cerca de los impactos potenciales en ente momento; las determinaciones serán hechas en el análisis ambiental en el EIR/EIS después de considerar los asuntos. Por favor vea la Notificación de Preparación para una lista preliminar de impactos ambientales potenciales asociados con el proyecto.

Qué medidas de mitigación serán considerados? Como se reducirá impactos ambientales?

En la aplicación a la CPUC y al BLM, SCE ha propuesto medidas que podrían reducir o eliminar impactos potenciales del proyecto propuesto. La eficacia de estas medidas (llamadas "medidas propuestas por el solicitante") serán evaluadas en el EIR/EIS, y medidas adicionales ("medidas de mitigación") serán desarrolladas para reducir impactos, si necesario. Cuando la CPUC y el BLM tomen sus decisiones finales a cerca del Proyecto Propuesto, definirán las medidas de mitigación que serán adoptadas como condiciones del proyecto, y la CPUC implementará un programa de monitorear las medidas.

Qué alternativas serán consideradas para el proyecto propuesto?

Las leyes ambientales estatales y federales requieren la evaluación de un alcance razonable de alternativas. El EIR/EIS evaluará alternativas al proyecto que podrían alcanzar los objetivos del proyecto y evitar o reducir los efectos significativos del proyecto. Alternativas pueden incluir desviaciones menores, diseños diferentes de las estructuras dentro del servidumbre, rutas diferentes para las líneas de alta tensión (en otros corredores), y nuevas líneas y subestaciones y/o equipo que podría alcanzar la necesidad del sistema eléctrica y los objetivos del proyecto propuesto. Adicionalmente la Alternativa de No Hacer el Proyecto/No Tomar una Acción será analizado en el EIR/EIS para analizará lo que ocurre en la ausencia del proyecto. El EIR/EIS tiene que evaluar los méritos comparativos de las alternativas.

Cómo puede el público involucrarse en el proceso de scoping?

Durante el periodo de *scoping* la CPUC y el BLM solicitan información acerca de temas y alternativas que se debe incluir en el EIR/EIS. La CPUC y el BLM son comprometidos a un programa de divulgación extensa que ofrece a las personas interesadas los instrumentos y recursos para ser informados sobre las etapas claves y para fomentar información del público. Todos los comentarios para el periodo de *scoping* de la CPUC necesitan ser recibidos al 12 de Junio de 2014 a lo más tarde. Uno puede comentar por lo siguiente:

Correo Postal: Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager); California Public Utilities Commission & Bureau of Land Management; c/o Aspen Environmental Group; 235 Montgomery Street, Suite 935; San Francisco, CA 94104-3002

Correo Electrónico: westofdevers@aspeneg.com

Fax y Mensaje de Voz: (888) 456-0254

Donde puedo encontrar más información?

Visite el sitio web del proyecto al: http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm

Appendix B-3

Newspaper Advertisements

THE PRESS-ENTERPRISE Thursday, May 15, 2014

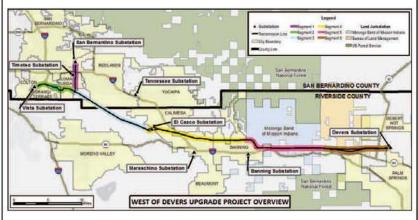


Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project Proposed by Southern California Edison Application No. A.13-10-020

The California Public Utilities Commission (CPUC) and the United States Department of Interior, Bureau of Land Management (BLM) are preparing a joint Environmental Impact Report (EIR) and an Environmental Impact Statement (EIS) referred to as an EIR/EIS for Southern California Edison's (SCE) proposed West of Devers Upgrade Project. The CPUC (as the State lead agency under the California Environmental Quality Act) and the BLM (as the Federal lead agency under the National Environmental Policy Act) will hold public meetings at the following times and locations to obtain input from agencies and the public on the scope and content of the EIR/EIS:

Monday, May 19, 2014 Banning City Hall Council Chambers 99 E. Ramsey Street Banning, CA 92220 6 to 8 p.m. Tuesday, May 20, 2014 Loma Linda Civic Center Community Room 25541 Barton Road Loma Linda, CA 92354 6 to 8 p.m.

Wednesday, May 21, 2014 Beaumont Civic Center Auditorium 550 E. 6th Street Beaumont, CA 92223 3 to 5 p.m. and 7 to 9 p.m.



BACKGROUNI

The West of Devers Upgrade Project, proposed by SCE, is located primarily within the existing West of Devers corridor in the incorporated and unincorporated areas of Riverside and San Bernardino Counties including the Morongo Band of Mission Indians reservation and the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, and Redlands. The West of Devers corridor traverses residential, commercial, agricultural, recreation, and open space land uses.

The West of Devers Upgrade Project as proposed by SCE involves several types of transmission upgrades including: (1) Segment 1: San Bernardino. Two existing 220 kV double circuit lines would have 45 towers removed and 61 new towers installed, within the existing ROW. (2) Segment 2: Colton and Loma Linda. One existing 220 kV line would be removed and rebuilt, including the removal of 29 double-circuit towers and installation of 35 towers. (3) Segment 3: San Timoteo Canyon. Removal of three existing sets of 220 kV towers and construction of two sets of towers, requiring removal of 116 individual towers and installation of 133 towers. (4) Segment 4: Beaumont and Banning. Removal of approximately 175 structures, and installation of approximately 186 towers. (5) Segment 5: Morongo Tribal Lands and Vicinity. Removal of approximately 137 structures and installation of approximately 108 structures. In this segment, three miles of the existing ROW on Morongo land would be abandoned and relocated to the south, near the 1-10 Freeway. (6) Segment 6: Whitewater and Devers Substation. Removal of approximately 116 structures and installation of 93 towers. (7) Substation equipment upgrades at Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations to accommodate increased power transfer on 220 kV lines. (8) Subtransmission upgrades would include removal and relocation of 2 miles of existing 66 kV lines and upgrades at Timoteo and Tennessee 66/12 kV Substations to accommodate the relocated 66 kV line. (9) Electric distribution line upgrades would include removal and relocation of 4 miles of existing 12 kV lines. (10) Installation of telecommunication lines and equipment for the protection, monitoring, and control of transmission lines and substation equipment

PROJECT INFORMATION

Information regarding the project's environmental review process, project documents, contact/mailing information, and a list of repository sites where project documents are available for public review can be found at: http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm

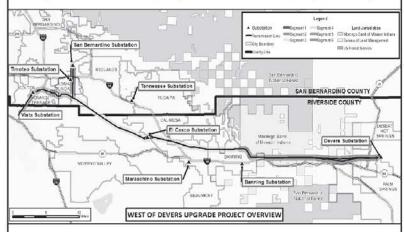
The CPUC's CEQA scoping comment period ends on Thursday, June 12, 2014. There will be an additional scoping period defined by BLM, to be noticed in the future. During the comment period, you may submit comments on the scope and content of the document at the public meetings noted above, via fax to the number below, or by mail to: Billie Blanchard (CPUC Project Manager)/Brian Paul (BLM Project Manager), California Public Utilities Commission & Bureau of Land Management, c/o Aspen Environmental Group, 235 Montgomery Street, Ste. 935, San Francisco, CA 94104-3002. For information or to provide comments e-mail us at westofdevers@aspeneg.com or call or fax: (888) 456-0254.

The San Bernardino Sun – Thursday, May 15, 2014

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PROJECT INFORMATION

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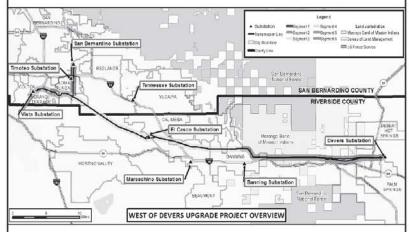
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Redlands Daily Facts - Thursday, May 15, 2014

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Proposed by Southern California Edison
Application No. A.13-10-020

The California Public Utilities Commission (CPUC) and the United States Department of Interior, Bureau of Land Management (BLM) are preparing a joint Environmental Impact Report (EIR) and an Environmental Impact Statement (EIS) referred to as an EIR/EIS for Southern California Edison's (SCE) proposed West of Devers Upgrade Project. The CPUC (as the State lead agency under the California Environmental Quality Act) and the BLM (as the Federal lead agency under the National Environmental Policy Act) will hold public meetings at the following times and locations to obtain input from agencies and the public on the scope and content of the EIR/EIS:

Monday, May 19, 2014 Banning City Hall Council Chambers 99 E. Ramsey Street Banning, CA 92220 6 to 8 p.m. Tuesday, May 20, 2014 Loma Linda Civic Center Community Room 25541 Barton Road Loma Linda, CA 92354 6 to 8 p.m. Wednesday, May 21, 2014
Beaumont Civic
Center Auditorium
550 E. 6th Street
Beaumont, CA 92223
3 to 5 p.m. and 7 to 9 p.m.



BACKGROUND

The West of Devers Upgrade Project, proposed by SCE, is located primarily within the existing West of Devers corridor in the incorporated and unincorporated areas of Riverside and San Bernardino Counties including the Morongo Band of Mission Indians reservation and the cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, and Redlands. The West of Devers corridor traverses residential, commercial, agricultural, recreation, and open space land uses.

The West of Devers Upgrade Project as proposed by SCE involves several types of transmission upgrades including: (1) Segment 1: San Bernardino. Two existing 220 kV double circuit lines would have 45 towers removed and 61 new towers installed, within the existing ROW. (2) Segment 2: Colton and Loma Linda. One existing 220 kV line would be removed and rebuilt, including the removal of 29 double-circuit towers and installation of 35 towers. (3) Segment 3: San Timoteo Canyon. Removal of three existing sets of 220 kV towers and construction of two sets of towers, requiring removal of 116 individual towers and installation of 133 towers. (4) Segment 4: Beaumont and Banning. Removal of approximately 175 structures, and installation of approximately 136 towers. (5) Segment 5: Morongo Tribal Lands and Vicinity. Removal of approximately 137 structures and installation of approximately 108 structures. In this segment, three miles of the existing ROW on Morongo land would be abandoned and relocated to the south, near the I-10 Freeway. (6) Segment 6: Whitewater and Devers Substation. Removal of approximately 116 structures and installation of 93 towers. (7) Substation equipment upgrades at Devers, El Casco, Etiwanda, San Bernardion, and Vista Substations to accommodate increased power transfer on 220 kV lines. (8) Subtransmission upgrades would include removal and relocation of 2 miles of existing 66 kV lines and upgrades at Timoteo and Tennessee 66/12 kV Substations to accommodate the relocated 66 kV line. (9) Electric distribution line upgrades would include removal and relocation of 4 miles of existing 12 kV lines. (10) Installation of telecommunication lines and equipment for the protection, monitoring, and control of transmission lines and substation equipment

PROJECT INFORMATION

Information regarding the project's environmental review process, project documents, contact/mailing information, and a list of repository sites where project documents are available for public review can be found at: http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm

The CPUC's CEOA scoping comment period ends on Thursday, June 12, 2014. There will be an additional scoping period defined by BLM, to be noticed in the future. During the comment period, you may submit comments on the scope and content of the document at the public meetings noted above, via fax to the number below, or by mail to: Billie Blanchard (CPUC Project Manager)/Brian Paul (BLM Project Manager), California Public Utilities Commission & Bureau of Land Management, c/o Aspen Environmental Group, 235 Montgomery Street, Ste. 935, San Francisco, CA 94104-3002. For information or to provide comments e-mail us at westofdevers@aspeneg.com or call or fax: (888) 456-0254.



Thursday, May 15, 2014

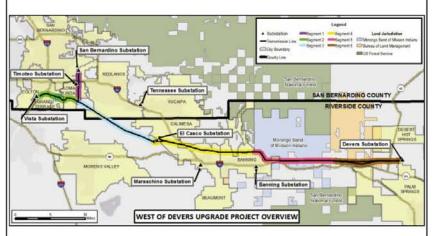


Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project Proposed by Southern California Edison Application No. A.13-10-020

The California Public Utilities Commission (CPUC) and the United States Department of Interior, Bureau of Land Management (BLM) are preparing a joint Environmental Impact Report (EIR) and an Environmental Impact Statement (EIS) referred to as an EIR/EIS for Southern California Edison's (SCE) proposed West of Devers Upgrade Project. The CPUC (as the State lead agency under the California Environmental Quality Act) and the BLM (as the federal lead agency under the National Environmental Policy Act) will hold public meetings at the following times and locations to obtain input from agencies and the public on the scope and content of the EIR/EIS:

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PROJECT INFORMATION

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The CPUC's CEQA scoping comment period ends on Thursday, June 12, 2014. There will be an additional scoping period defined by BLM, to be noticed in the future. During the comment period, you may submit comments on the scope and content of the document at the public meetings noted above, send via fax to the number below, or mail to: Billie Blanchard (CPUC Project Manager)/Brian Paul (BLM Project Manager), California Public Utilities Commission & Bureau of Land Management, c/o Aspen Environmental Group, 235 Montgomery Street, Ste. 935, San Francisco, CA 94104-3002. For information or to provide comments, e-mail us at westofdevers@aspeneg.com, or call or fax: (888) 456-0254.

Unidos (La Prensa) - Friday, May 16, 2014

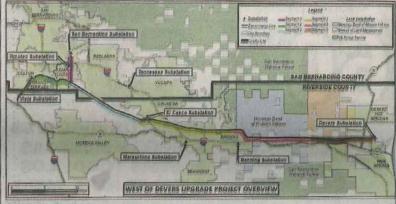


Aviso de preparación para un Informe de Impacto Ambiental/Declaración de Impacto Ambiental conjuntos para el Proyecto de Mejora de West of Devers propuesto por Southern California Edison Solicitud n.º A.13-10-020

La Comisión de Servicios Públicos de California (CPUC, por sus siglas en inglés) y la Oficina de Administración de Tierras (BLM, por sus siglas en inglés) del Departamento del Interior de los Estados Unidos están preparando un Informe de Impacto Ambiental (EIR, por sus siglas en inglés) y una Declaración de Impacto Ambiental (EIS, por sus siglas en inglés) conjuntos, a los que se hará referencia como el EIR/EIS, para el Proyecto de Mejora de West of Devers propuesto por Southern California Edison (SCE). La CPUC (en calidad de agencia principal del Estado de acuerdo con la Ley de Calidad Ambiental de California, CEQA) y la BLM (en calidad de agencia federal principal según la Ley Nacional de Política Ambiental, NEPA) celebrarán reuniones públicas en las siguientes fechas y lugares para recibir ideas de las agencias y del público acerca del alcance y el contenido del EIR/EIS.

Lunes 19 de mayo de 2014
Banning City Hall
Council Chambers
99 E. Ramsey Street
Banning, CA 92220
De 6 a 8 p.m.

Martes 20 de mayo de 2014 Loma Linda Civic Center Community Room 25541 Barton Road Loma Linda, CA 92354 De 6 a 8 p.m. Miércoles 21 de mayo de 2014 Beaumont Civic Center Auditorium 550 E. 6th Street Beaumont, CA 92223 De 3 a 5 p.m. y de 7 a 9 p.m.



ANTECEDENTES

El Proyecto de Mejora de West of Devers, propuesto por SCE, está situado principalmente dentro del corredor existente de West of Devers, en las áreas incorporadas y no incorporadas de los Condados de Riverside y San Bernardino, las cuales incluyen la reserva Morongo Band of Mission Indians y las ciudades de Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda y Rediands. El corredor de West of Devers atraviesa zonas residenciales, comerciales, agricolas, recreativas y terrenos de espacio ablerto.

El Proyecto de Mejora de West of Devers, tal como ha sido propuesto por SCE, implica varios tipos de mejora de la transmisión, los cuales incluyen: (1) Segmento 1: San Bernardino. A dos líneas existentes de circulito doble de 220 kV se les quitariar 45 torres y se instalarian 61 nuevás torres dentro del derecho de paso existente. (2) Segmento 2: Colton y Loma Linda. Sc retiraría una línea existente de 220 kV y se la volvería a construir, lo cual incluiría que se retirasen 29 torres de circulito doble y la instalación de 35 torres. (3) Segmento 3: San Timoteo Canyon. La remoción de tres juegos existentes de torres de 220 kV y la construcción de dos juegos de torres, lo cual requeriría la remoción de 116 torres individuales y la instalación de 130 torres. (4) Segmento 4: Beaumont y Banning. La remoción de aproximadamente 176 setructuras y la instalación de aproximadamente 137 estructuras y la instalación de aproximadamente 108 estructuras. En este segmento, se abandonarian tres milla del derecho de paso existente en el territorio de Morongo y se las reubicaría al sur, cerca de la autopista I-10. (6) Segmento 6: Whitewater y la Subestación de Devers. La remoción de aproximadamente 116 estructuras y la instalación de 93 torres (7) Mejoras del equipo de la subestación en las Subestaciones de Devers, El Casco, Eliwanda, San Bernardino y Vista para facilitar la transferencia de mayor, potencia en líneas de 220 kV. (8) Las mejoras de subtransmisión incluirían la remoción y la reubicación de 2 millas de líneas existentes de 66 kV y mejoras en las subestaciones de 66/12 kV de Timoteo Tennessee para albergar la línea de 66 kV reubicada. (9) Las mejoras en las línea de distribución eléctrica incluirían la remoción y la reubicación de 4 millas de líneas existentes de 12 kV. (10) La instalación de líneas y equipo de telecomuni cación para la protección, el monitoreo y el control de las líneas de transmisión y el equipo de la subestación.

INFORMACIÓN SOBRE EL PROYECTO

Se puede encontrar la información sobre el proceso de revisión ambiental del proyecto, los documentos del proyecto, los dato de contacto/dirección postal y una lista de los repositorios en los que los documentos del proyecto están disponibles para s revisión pública en: http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm

El plazo para comentar acerca del alcance de la CEQA de la CPUC finaliza el jueves 12 de junio de 2014. Habrá un períod de evaluación de alcance adicional definido por la BLM que se indicará en el futuro. Durante el período de comentarios, pued presentar comentarios acerca del alcance y el contenido del documento en las reuniones públicas antes mencionadas enviarlos por fax al número que se encuentra a continuación, o por correo postal a: Billie Blanchard (CPUC Projec Manager)/Brian Paul (BLM Project Manager), California Public Utilities Commission & Bureau of Land Managemen c/o Aspen Environmental Group, 235 Montgomery Street, Ste. 935, San Francisco, CA 94104-3002. Si desea solicita información o hacer comentarios, escribanos por correo electrónico a westofdevers@aspeneg.com, o llámenos o envienos u fax al: (888) 456-0254.

Appendix B-4

Scoping Meeting Transcripts

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7	SCE'S PROPOSED
8	WEST OF DEVERS UPGRADE PROJECT
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10	CPUC/BLM SCOPING MEETING
11	FOR PREPARATION OF A DRAFT EIR/EIS
12	
13	
14	
15	May 19, 2014
16	Banning, California
17	
18	
19	
20	
21	Reported by:
22	VALERIE D. GRANILLO
23	CSR NO. 11469
24	Job No. 1861465
25	PAGES 1 - 28
	Page 1

MR. BRITT: So with that I think we're going to begin to take
comments. Again, I will call people up that have filled
one of these out. I have one as of now. So right now we
have one speaker. If you'd like to fill one of these out
or speak, if you can just fill that out, come up and drop
it off or hand it to someone in the back and they'll drop
it off for you.
And David Duarte, if you would come up. And if

And David Duarte, if you would come up. And if you can state your name just for the record so the court reporter can put that in.

DAVID DOHERTY: I'm David Doherty. I live in Whitewater right off the exit. And I notice from the plan that you want to move the towers 35 feet south. That's

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Veritext National Deposition & Litigation Services 866 299-5127

1 going to go right across my backyard and the yards of the five houses next to me. Because Amethyst, the street I 2 3 live on, curves and the towers are coming through, it's catching the back ends of our yards. And on top of that, 5 I see the footings is already been -- they've marked it on the ground. They want to put a tower right next to my 6 And it would kind of look like this. I mean, it's 7 house. 8 not -- you can have these if you want to give you an idea. 9 I don't understand. There's so much wide open 10 property behind me. I mean, there's a big squash of land, and they want to move it closer to the houses. And I 11 don't understand it. I mean, if you could see to moving 12 13 it further into the grass area, great. But, I mean, house 14 values are bad enough. I can't imagine having that next 15 door to me if I could help it. 16 But I'm also, to help out, there's my neighbor 17 who owns the five pieces of property next to me, and I 18 just -- I hoped she was going to be here tonight, but she 19 couldn't make it. But I want to state my piece. The tower in question is DEC106, and that will just be -- I 20 mean, I don't know. I don't understand why they would 21 have to move the towers off the pad they're on now because 22 you already have -- the footings are already there for the 23 24 other towers. But if they have to be improved, great. 25 But moving them closer to the houses, I think, would not

1	be wouldn't be good. So I speak my piece on it.
2	MR. BRITT: Well, thank you very much for coming,
3	and that's exactly the kind of comment we're looking for.
4	Looks like I have a few more speaker cards, at
5	least one.
6	All right. Edward Miller. There's no R on here.
7	Let me add an R. You want to come up and speak?
8	EDWARD MILLER: I just have a simple question.
9	Banning has its own electric utility, and I was wondering
10	whether or not there was any change in the connection of
11	these power lines to our utility.
12	MS. LEE: I can answer that. I'm fairly certain
13	the answer is no because this segment of the group doesn't
14	connect to any local substations. It goes from the Dever
15	substation to the new El Paso substation, which is the
16	other side of I-10. So it doesn't drop off at any of
17	these. And as the people can correct me if that's not
18	correct, we've got a couple people here from Southern Cal
19	Edison.
20	EDWARD MILLER: Thank you.
21	MR. BRITT: All right. Any more, Raul? One
22	more, okay.
23	Again, after the meeting we will be here so you
24	can stand by the boards and look at them and ask some more
25	question if you'd like. Again, if you want to think about

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1	it or you are a little shy, you can just fill it out
2	tonight and just leave it behind or you can take it home
3	and send it to us as well.
4	Also while we're waiting, the meeting tomorrow is
5	actually in Loma Linda 6:00 to 8:00 at the Loma Linda
6	Civic Center. And then the meeting on Wednesday is in
7	Beaumont, and that's 7:00 to 9:00. We'll be doing a
8	recitation of the meeting at 3:00 to 5:00 as well.
9	So the next speaker is Susan Savolainen. I'm
10	really bad at pronouncing names.
11	SUSAN SAVOLAINEN: Okay. So I just had a couple
12	questions. Maybe it's too early in the process for you to
13	answer them. I don't know.
14	Do you know the projected length of time it's
15	going to take to go from one segment to the other other
16	until you're done? I mean, is it years, weeks, months?
17	MS. LEE: For construction?
18	SUSAN SAVOLAINEN: Yes.
19	MS. LEE: Yeah. Actually, that was on slide, but
20	I went over it a little too quickly, I think. The
21	construction period is three to four years.
22	SUSAN SAVOLAINEN: Okay.
23	MS. LEE: And partly that's because there are
24	existing lines there, and the project has to be
25	constructed around the lines without taking too many out
	Page 25

1 of service. So we don't have a very detailed construction schedule yet, but we're working on one. But it is going 2 to take, for all of it, the whole 45 miles to be 3 completed, up to four years. 4 5 SUSAN SAVOLAINEN: The other question I had was -- well, there's two more. I didn't see mentioned the 6 7 Migratory Bird Treaty Act. MS. LEE: That is definitely on the list with our 8 9 wildlands is to evaluate compliance with the Migratory 10 Bird Treaty Act. And we coordinate with additional rescues to make sure that we, if mitigation measures are 11 required, that we have the right kind of mitigation. The 12 13 nesting bird issues with migratory birds have been big 14 issues of concern with previous transmission lines even in this area, so we have a lot of people with experience 15 16 taking a look at that issue. 17 SUSAN SAVOLAINEN: And I guess my last question is public routes of transit, are they going to be 18 19 identified specifically? Like for example, Highway 62, 20 you know, if the lines are going to cross Highway 62 and that kind of thing. 21 22 MS. LEE: Absolutely. Part of the transportation analysis looks at any effect on roadways in terms of --23 24 especially if those crossings -- or crossing roads would 25 require, that might require road closure. There are Page 26

1	portions of I-10, as you know, out west of Beaumont. So
2	the transportation analysis will identify where those
3	crossings are and what the effects might be. There are
4	standard requirements with Caltrans to cross roads with
5	power lines. They usually do it at something like 3:00 or
6	4:00 in the morning to try and avoid traffic effects, but
7	it is definitely something that will be described in the
8	transportation analysis.
9	SUSAN SAVOLAINEN: Okay. Thank you very much.
10	MR. BRITT: Thank you. Anyone else?
11	All right. Well with that, I want to just thank
12	everyone again for your time coming out today, and we'll
13	be hanging around for a little while. And if you'd like
14	to ask any more questions, please feel free to do that.
15	Thank you so much.
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25	PAGES 1 - 31
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10	MR. BRITT: So with that, if there is anyone that would like
11	to make a comment, we're going to invite you to submit
12	your comment card and then come up to the mic.
13	Looks like we might have one taker. So as we are
14	waiting for that, just to remind you, our meetings
15	tomorrow in Beaumont start at 3:00 and 5:00, and they are
16	located at the Beaumont Civic Center auditorium gym at 550
17	East Sixth Street in Beaumont. So providing one in the
18	middle of the day and one after hours as well.
19	UNKNOWN SPEAKER: General questions also require
20	going to the microphone?
21	MR. BRITT: We would prefer that because we do
22	have a court reporter, so we want to get all the
23	information that you provide. So it would help us if you
24	do that.
25	LINDA REHM: I don't know if this is the time to
	Page 22

Veritext National Deposition & Litigation Services 866 299-5127

bring this up or not. But just in reading the mail-out
that was sent, it had the maps and so on. And so I'm the
property manager for Corporate Business Center, and it
consists of 31 office industrial buildings right off
Mountain View Avenue. And so I talked to the owner of the
property today who we manage the property for, and we had
some questions in terms of how it looked like we were
in segment number 2, but we wanted verification of that.
And then we wanted to find out on the map exactly where we
were in relation to your line item diagram of the
different sections. And then through our park, business
park, is an orange grove, and we actually have Edison
towers. And so I didn't I didn't bring four. I just
brought one. And before I came here, I marked where the
towers were located in the orange grove, the large one
the tall ones and the shorter ones. And one of the
questions that the owner has is are these going to be
replaced. And if they are, is it they're going to be
replaced with new ones and what would be those sizes. So
I don't know if this is the time to do that or I can wait
until after the meeting.
MS. LEE: You know, I think what would be most
useful we'll be here for a while is for us to go to
look at your area in most detail. We would love to have a
copy of what you have, and we'll scan it and share it

1	amongst ourselves. But let's meet in the back corner
2	where we have the really detailed maps.
3	LINDA REHM: Yeah, that's good.
4	MS. LEE: And show you exactly what we have. I
5	know exactly where that is. I think we just want to
6	understand so we can answer your questions. That's great.
7	Thank you.
8	LINDA REHM: Thank you.
9	MR. BRITT: Just go ahead and bring it forward.
10	And then just state your name for the record. Thank you.
11	BILL OLINGER: My name is Bill Olinger. I'm a
12	local resident. In fact, I live right at the base of the
13	Loma Linda hills right out here, kind of a little bit
14	northeast of Hoover Crooks Park. And my questions could
15	be answered by looking at the map, but it would appear
16	that one segment runs along these hills maybe coming in
17	through Grand Terrace and San Timoteo. And those towers I
18	can see from my front yard. And is the other segment,
19	then, that easement that runs through where there are two
20	different residential areas and a very wide kind of a
21	recreational walkway?
22	MS. LEE: You're exactly right, yeah.
23	BILL OLINGER: Okay.
24	MS. LEE: Segment 1, actually and the labels
25	were reversed on that one map. Segment 1 is the one that

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1 where the two towers come down in pairs off the top of the hill right above you through the park and all the way down 2 3 to the Mountain View substation which is across the 210 kind of on the corner of Mountain View Avenue and San Bernardino Avenue. So yeah, that is one segment. pair of towers that come down there, those will all be 6 7 removed and replaced. 8 BILL OLINGER: In most cases with taller ones? 9 MS. LEE: They're slightly taller, yeah. 10 dimensions, they're all a little different depending on the elevation and the ground level and things like that. 11 But we actually have, on these little diagrams in the back 12 13 of this notice, the average height of what's there now 14 compared with the average height of what will be there 15 before -- when this is done. So we can kind of go over 16 that with you. 17 So that's one segment. And you're right. other one, because we're right here at this fork, is the 18 19 ones that go across the top of the hill. In that case you 20 can see a couple lines up there. Only one of those, one double circuit tower that goes into the Vista substation 21 in Grand Terrace, one of those will be removed and 22 23 replaced with new towers. 24 BILL OLINGER: Okay. So the visual impact is not 25 going to be tremendous on the hills there then?

1 MS. LEE: You know, I think there are simulations. We'll be doing simulations. But you will 2 still see one tower. You know, one comes down. One comes 3 The locations will be slightly different just based on the engineering issues. But the height difference is not dramatic. Again, we have the average height before 6 7 and after in here, and we can show you where those are. 8 BILL OLINGER: Okav. 9 MS. LEE: So it probably depends on exactly where 10 you're looking from. You may see a tower in one location 11 that wasn't there before. But for the most part, the numbers of towers are not very different between what's 12 13 there now and what's going to be there later. 14 BILL OLINGER: My other concern would just be 15 would there be any lengthy road closures in the residential area there or lots of construction noise? 16 That's something we're actually going 17 MS. LEE: to look at very carefully in the environmental report. 18 19 And we need to pin down the construction schedule. construction of the project will be extended over three to 20 four years from one end to the other all the way from 21 North Palm Springs to North Palm Desert to Colton, Grand 22 23 Terrace and San Bernardino, Redlands. So the schedule for each segment isn't defined yet. And the extent to which 24 25 city streets would be used versus the actual right-of-way,

1	we don't know all those details. But it's something that
2	we're we know needs to be explained. And we've
3	actually had that question asked us this afternoon by some
4	of the folks with the City of Redlands. So we're going to
5	be talking to Southern Cal Edison to get a good
6	understanding of the use of city streets. Road closures,
7	I think, are unlikely because it's wires crossing the
8	roads, and the towers are in the right-of-way itself.
9	BILL OLINGER: You said they are unlikely?
10	MS. LEE: I think it's unlikely. I would
11	hesitate to go much beyond that. But or, I should say,
12	maybe not very long. Because even to cross you know,
13	like this project crosses interstates in a couple places.
14	And you can't run new wires across an interstate while
15	it's running. But they tend to do those in the middle of
16	the night.
17	BILL OLINGER: Okay. Thank you.
18	MS. LEE: So we'll address that. Thank you.
19	MR. BRITT: All right. Is there anyone else that
20	would like to make a comment tonight?
21	All right. Well, seeing none, we will be staying
22	around a little while or as long as you would like to talk
23	to you do you have a comment?
24	TERRENCE EMERSHY: Yeah, I do.
25	MR. BRITT: Go ahead and bring it forward.
	Page 27

1 Then just state your name. Thank you. TERRENCE EMERSHY: Terrency Emershy from San 2 3 Bernardino. I had a couple of questions. 4 I noted on one of your slides that it showed, I 5 think, in San Timoteo Heights. My family has some property in San Timoteo Canyon in segment 3, I believe it 6 7 And I'm curious. It shows that, I think, they're 8 going to remove 116 towers in San Timoteo Canyon. I think 9 that's what I saw. And they're going to replace it with 10 133. And I'm curious where the locations of all of those are going to go if they're reducing by one set of towers. 11 I might have misunderstood what I saw on that. 12 13 Are you familiar with that at all? It was in one 14 of the earlier slides where it broke down how many towers 15 you guys were going to be putting up and taking down. 16 MS. LEE: Right. You're right. That's the data 17 that is shown in here. And the -- you're correct. are three sets of towers that run along the hillside in 18 19 San Timoteo, and they will be replaced by two sets of towers. So -- if this is correct. If it's not correct, 20 one of you can correct us. We have some folks from Edison 21 22 If it's correct, it would only be because a couple 23 of the towers would be closer together than they are 24 currently. We do have some more detailed maps we can show 25 They're with some preliminary engineering on them

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1	that shows where the towers
2	TERRENCE EMERSHY: I was hoping to see some of
3	that. I'm probably at the wrong meeting for what I'm
4	looking for.
5	MS. LEE: This is a perfect meeting for that,
6	actually, because San Timoteo where it runs between here
7	and Banning we were in Banning yesterday. So whichever
8	end is closer for you, this is perfect and we have we
9	can kind of walk you through the preliminary engineering
10	for what this looks like and show you the proposals for
11	what would come out and what would go in. And it gives
12	you a sense of how the engineering will work for that. So
13	let us meet you in the back of the room.
14	TERRENCE EMERSHY: Okay. That's fine.
15	MS. LEE: We'll walk through it.
16	TERRENCE EMERSHY: That's generally speaking what
17	I was interested in. Thank you.
18	MR. BRITT: All right. Anyone else?
19	Okay. Then just as a reminder, this all will
20	culminate in a draft report, which there will be a 45-day
21	public comment period at that point in review of the
22	document.
23	Do we have any idea when that will be released,
24	the draft document?
25	MS. BLANCHARD: I had indicated that it's
	Page 29

1	estimated fall 2014.
2	MR. BRITT: Fall 2014, okay. So later this year.
3	MS. BLANCHARD: That's as close as we can get
4	right now.
5	MR. BRITT: So no exact dates, but later on this
6	year.
7	So again, thank you so much for taking time out
8	of your busy schedules to come here tonight, and we'll
9	stay and answer your questions. Thank you.
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2	SCE'S Proposed
3	West of Devers Upgrade
4	Project
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8	CPUC/BLM
9	Scoping Meeting
10	for Preparation of a
11	Draft EIR/EIS
12	Beaumont City Hall, Beaumont, California
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14	May 21, 2014
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1	
2	Beaumont, California
3	May 21, 2014
4	3:00 p.m.
5	
6	MEETING SPEAKERS:
7	
8	SANDRA ALARCON-LOPEZ
9	ASPEN ENVIRONMENTAL GROUP
10	
11	SUSAN LEE
12	EIR/EIS
13	
14	BILLIE BLANCHARD
15	CALIFORNIA PUBLIC UTILITIES
16	
17	BRIAN PAUL
18	BUREAU OF LAND MANAGEMENT
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	Page 2

1	has not yet been suggested for this project. If that
2	is a specific scoping comment that you would like to
3	make, we'll absolutely consider the option.
4	What we would like to hear from you is
5	locations. If there is a specific area where you
6	would prefer it underground and what reason; that
7	would be most useful to us. Or are you just asking
8	in general?
9	MR. RAFTER: I'm asking in general. And it
10	is definitely safer, not only for the public, but
11	also for the electric company. Then you do not have
12	to worry about winds, lightening or any other thing.
13	Once they are underground, it's almost maintenance
14	free.
15	I was just wondering why it was not
16	considered.
17	MS. LEE: The main reason it was not
18	initially considered, is it is quite a bit more
19	expensive.
20	MR. RAFTER: I know that.
21	MS. BLANCHARD: I will like to say again,
22	we are at the beginning of this proposed project.
23	Edison suggests what they want for the proposed
24	project. And then the PUC will conclude the
25	enviromental analysis and the general proceeding.

1	So there is time for everyone to comment
2	on the project, what you think should happen or not,
3	options. So they have just brought to us an
4	application. So we are at the beginning of the
5	process. So if anyone has any suggestions on what
6	they would like to see done, we need to hear from you
7	in these comments.
8	MR. RAFTER: That was my suggestion.
9	MS. LEE: Thank you.
10	MS. ALARCON-LOPEZ: Anyone else?
11	
12	ERIC JOHNSTON OF SAN DIEGO, CALIFORNIA:
13	MR. JOHNSON: Good afternoon. I am Eric
14	Johnston. I'm here representing Wagner Wind Project
15	in Palm Springs and Baywa Energy Group.
16	I applaud you for the efforts so far for
17	this necessary project.
18	Just a couple comments on the mitigation
19	measures noted in the scoping documents so far.
20	Under socioeconomic impacts and under
21	impacts to utilities, I do not see anything in
22	mitigation for existing energy producers that are
23	going to suffer serious curtailments over the next
24	three or four years and possibly be in breach of
25	their purchasing agreements contracts for energy

1	delivery to wholesalers and the public utilities.
2	MS. ALARCON-LOPEZ: Thank you. Any other?
3	
4	LANNY SWERDLOW OF WHITE WATER:
5	MR. SWERDLOW: Some of these transmission
6	lines are on my property. And what kind of effect
7	will it cause for me using the property after it's
8	done? As matter of fact, what can I do with that
9	property now?
10	MS. LEE: It's kind of a legal easement
11	question for Southern California Edison.
12	MS. ALARCON-LOPEZ: That is right. We are
13	taking note of it, we will consider your comment and
14	I guess we will think through that.
15	MR. SWERDLOW: You're not answering
16	questions today?
17	MS. ALARCON-LOPEZ: If he could, we would.
18	What we need to do is go back and take it into
19	consideration. That is not something we answer right
20	away.
21	MS. BLANCHARD: Some of it involves looking
22	at the landfill use impact issues that each person
23	identifies or group identifies, then we look at what
24	can be done about that issue in terms of mitigation
25	measures, in terms of alternatives, reroutes, that

1	type of thing. So it's good for us to hear these
2	issues, and the more you can tell us in a letter
3	about the property, the address, what is going on,
4	what
5	MR. SWERDLOW: What you're saying is I need
6	to do some more asking. So who should I ask?
7	MS. ALARCON-LOPEZ: Well, at this point,
8	you need to write it down, what your issues are.
9	MR. SWERDLOW: You want me to list where
10	the property is?
11	MS. ALARCON-LOPEZ: I think that would
12	help. If you took at this form, fill it out, give us
13	specifics about where your property is at and what
14	your issues are of concern, then we will definitely
15	consider it. Because it is like Billie said, we do
16	look at those issues from a land use prospective.
17	MR. SWERDLOW: You will consider it and get
18	back with an answer?
19	MS. ALARCON-LOPEZ: If we can right away,
20	we will give a preliminary answer. We might not give
21	you the answer that you're looking for.
22	MR. SWERDLOW: Can I expect some kind of
23	response? If I do not hear something back, do I
24	contact you? How long should I wait?
25	MS. ALARCON-LOPEZ: You could

1	MR. SWERDLOW: How long should I wait
2	before I realize I'm not getting a response?
3	MS. ALARCON-LOPEZ: We'll get back right
4	away. If you have a specific question you want to
5	ask, if you could put it in writing, we will get back
6	to you, even if it is just to say we need to look at
7	it further.
8	Anyone else?
9	We are going to be here this evening from
10	7:00 to 9:00.
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25	Pages: 1-25
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1	
2	Beaumont, California
3	May 21, 2014
4	7:00 p.m.
5	
6	MEETING SPEAKERS:
7	
8	SANDRA ALARCON-LOPEZ
9	ASPEN ENVIRONMENTAL GROUP
10	
11	SUSAN LEE
12	EIR/EIS
13	
14	BILLIE BLANCHARD
15	CALIFORNIA PUBLIC UTILITIES
16	
17	BRIAN PAUL
18	BUREAU OF LAND MANAGEMENT
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1 2 The following Attached Presentation was presented 3 in public forum at Beaumont City Hall, including Presentation of Story Boards and Maps, PowerPoint 4 5 Presentation at 7:00 p.m. A handout of the presentation was offered to all 6 public attendees along with a Speaker Presentation card The public was also offered to speak 8 for comments. 9 their comments at the meeting or speak directly to the 10 Court Reporter and were transcribed and are attached 11 hereto as follows: 12 13 14 PUBLIC COMMENTS 15 16 TOM HARRIS OF REDLANDS: 17 MR. HARRIS: For the record, Tom Harris. 18 So hello, everybody. So I have a 19 property San Mateo Canyon, I own property in San 20 Mateo Canyon and so Verizon has the right of way in 2.1 the rear portion of my property. It is a 10-acre 22 parcel and towers are actually placed on the rear 23 portion of my property, so the southern most portion of my property. 2.4 2.5 And so when I received this notice of

1	preparation, there were a couple of things, so I will
2	first ask some clarifying questions. One of the
3	things that I noticed in the notice of preparation is
4	that mitigation measures. The California Edison
5	proposed measures that could reduce or eliminate
6	potential impacts of the proposed project. So I
7	guess what I starting to understand is that those
8	mitigation measures have not yet been proposed; is
9	that correct.
10	MS. LEE: There are two kinds of mitigation
11	measures. What Edison submits its application, it
12	includes there initial measurers. Those are the
13	applicant proposed measures, but the consultant team
14	and the agencies will develop mitigation measures in
15	addition to that. And they may be modifying those
16	measures or they may be new measurers. In a normal
17	EIR/EIS, there are many, many more mitigation
18	measures presented by the agencies in addition to the
19	ones that the applicant has proposed. So it is on
20	top of those.
21	MR. HARRIS: Thank you. So I'm
22	understanding then we will have an opportunity to
23	review those mitigation measures at some point?
24	MS. LEE: Absolutely. They will be in
25	draft EIR/EIS. But if you have suggestion measurers
	Page 4

1 or any suggested sort of impact reduction 2 suggestions, this would be a great time. If there 3 are things you have thought of now, we love to hear them during the scoping period. 4 Thank you. 5 MR. HARRIS: Great. 6 I obviously am in Section 3 of the 7 So Attachment A of the Notice of project. 8 Preparation I received was a summary of potential 9 issues for impact. And I would say I read through all of this and all of it's important to me, but some 10 11 of the most significant things are right at the top 12 the list, esthetics. So two things, that I like to 13 find out how much of a voice I have in the placement of the towers. Currently there are three towers. 14 15 The northern most tower is the one that I see the 16 My home is down on the lower, on flat portion 17 of my property, probably the back four to five acres of this 10- to 11-acre parcel is hill. So that is 18 19 where the three towers are placed. So when I looked 20 at diagram of the existing versus the proposed, and I 21 have realized this is just a diagram, but it shows 22 that the right of way is a 400 foot path. And I'm 23 assuming that is probably standard across the 24 corridor. But what I was trying to understand is:

How much of a voice do I have in the general

2.5

1 placement of these towers? If all three of these are 2 going to be removed, I would like to believe, I'm not 3 asking for those towers to be put somewhere else or shipped further back to where they are no longer on 4 my property, but rather on the parcel behind me, what 6 I would like is to be able to believe, if possible, where it is possible from an engineering prospective, 8 to have these towers shifted back in that 400 foot 9 right of way to where they are less prominent with 10 respect to me seeing these towers as I enter my 11 property let's say. 12 Then the other thing is from an 13 engineering prospective, I know a little bit about electromagnetic fields, how they fall off based on 14 15 distance and oftentimes the way in which these lines 16 are placed next to one another somehow, that that 17 cancels to a certain extent the emission of the electromagnetic field or the distance in which it 18 19 But I would like to get a little more travels. 20 understanding based on placement, what is being 21 mitigated with respect to possible consequences of electromagnetic radiation for a lack of a better way 22 23 of expressing it. Thank you. 24 Two basic good questions. MS. LEE:

Page 6

What would be most useful to you?

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1 you walked in just when we were starting. Before you 2 leave, if can you stop and talk to Hedy, who is 3 waving at you, she can show you the detailed preliminary engineering map of what Edison is now 4 5 proposing in the first round of engineering in terms 6 of where towers are located. And what we would love you to do is just tell us back, and we can give you a 8 copy of this map, where you think they would be 9 better placed and then we can work through that as we are going through the analysis and see, you're right, 10 11 if there is engineering issues, for sure, but to the extent there is room for modification, we will work 12 13 through that with our analysis. Thank you. 14 MR. HARRIS: Yes. The reason 15 that I ask the question with respect to where the 16 towers are placed, because in this 400 foot corridor, 17 at least in the diagram I'm looking at, it makes it appear that these towers are shifted all the way to 18 19 the northern most portion, at least, again in the 20 diagram I'm looking at. 21 MS. LEE: Yeah. You'll see the in maps, 22 they are in plan view, so you can actually see where 23 the current location is. And in many places along 24 the right of way, the two towers are along one edge

or the other of the right of way just to allow the

25

1	potential future use of the rest of it for any other
2	transmission projects in the future that might come
3	up.
4	MR. HARRIS: Is this based on, the map that
5	I might see then, would that be specific to each pad
6	where the towers are occurring?
7	MS. LEE: You can see very detailed
8	locations on there. Again, the engineering is
9	preliminary at this point, so we do not know that
10	that is exactly where they will be, but getting your
11	feet back in that while the engineering is being
12	designed would be valuable.
13	The second question about the EMF, Edison
14	has submitted, and we can point to this on the
15	website, EMF Field Management Plan along with its
16	application, it includes a lot of really good
17	information showing grafts of exactly how the
18	magnetic field drops off on either side. And you are
19	right, having two towers closer together has a
20	potential impact to reducing the field. So there is
21	a good appendix to Edison's application that is on
22	the website.
23	MR. HARRIS: Southern California Edison
24	website?
25	MS. LEE: CPUC website.

1	MR. HARRIS: It's in the notice
2	MS. LEE: Right. If you leave your name
3	with us, it will be faster for us to find the link to
4	that. There is a lot of material on the website.
5	MR. HARRIS: I will happy to have dialogue
6	with e-mail as well.
7	MS. LEE: If you give Hedy that.
8	MR. HARRIS: Thank you.
9	MS. ALARCON-LOPEZ: Thomas Covey.
10	
11	THOMAS COVEY OF PALM SPRINGS:
12	MR. COVEY: My name is Thomas Covey. We
13	are at Segment 6, milepost 45, right at Devers
14	Substation, 61948 Smoke Tree Road.
15	There are a couple of things.
16	I did not receive notice of the
17	preparation. I did not receive this. I just
18	happened to run across it on the Internet the other
19	day. Then I went to my neighbor and found out that
20	he got it. But it abuts my property.
21	I want to address the socioeconomic
22	situation. Because I live so close to it, I been
23	there for approximately 30 years, my property is
24	worthless. Nobody will buy it. So that has hurt me
25	considerably. I'm not going anywhere, but some day
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	Page 9

1 my kids might. 2 Public health and safety, addressing that along with his comment is the electromagnetic 3 4 radiation and not only radiation, but electromagnetic 5 induction. Now, I have lived directly adjacent to I have electromagnetic radiation that 6 the new line. I measured 100 yards past my house. I have 8 electronmagnetic direct induction on my property. And I have made Edison aware of this over the last 9 few months since they fired that thing up. 10 11 Well, my question is -- by the way, what 12 we do there is we have a recording studio, we are a 13 record label. And our engineers are telling us that we are going to be in trouble. My understanding is 14 15 it is not even up to speed yet, not running full 16 capacity. When it runs to full capacity, I will be 17 out of business. That is what our engineers say, unless we do some crazy Faraday cage or something to 18 19 block this off. 20 To your project, the main point was I did not get any notice. 21 22 No. 2, I realize it's farther away and 23 I'm concerned about the cumulative impact of this 24 stuff going on out there in the back. We have done 25 as much as we possibly can to block it off. We have Page 10

1	been working with different people at Edison. And
2	they have not so far they just feel sorry for us.
3	That is not quite enough. It's not like we are some
4	little farmer out there. I have million dollar rock
5	stars coming to my house all of the time. If
6	somebody gets electrocuted, it's going to be a big
7	problem. So I just want to know your feelings and
8	what you think the electromagnetic is, that going to
9	be another 500kb line down there or are you just
10	replacing the 280 that is there and what impacts that
11	will have upon our property?
12	MS. LEE: Those are great comments. And we
13	will address all of that stuff. We have a section on
14	socioeconomic, definitely public health and safety is
15	addressed.
16	The induced current issue, we understand,
17	we have had similar people with similar concerns.
18	And I encourage you to be persistent with Edison,
19	because that something that they need to help you
20	solve. But we address it in the enviromental
21	document, because as you pointed out, it is a safety
22	concern.
23	The cumulative impacts is an issue that
24	he will cover. What would be useful to us, if you
25	could leave well, you gave your address.

1	We'll check the mailing list, you may be
2	just outside of that range. The 220kb projects are
3	north of the two 500s.
4	MR. COVEY: Correct.
5	MS. LEE: You are probably just outside
6	that. We mailed to 600 feet on either side. Now
7	that you're here, you will be added to our list.
8	MR. COVEY: Well, I may add that they just
9	did the central power plant and I did not get
10	notification of that either. I don't know who does
11	your list
12	MS. LEE: We go to the County Assessor.
13	MR. COVEY: Something they have to move
14	it out. They keep building things. And like the
15	shunt station, you are aware of the shunt station
16	that abuts my property, they just built that. They
17	did not have anything, did not have no documents
18	involved, it was a maintenance issue, I think.
19	Those are my comments. I just want to
20	keep apprized of what is going on. Now I do not know
21	what to do. I don't if I should expand my business
22	or am I going to be out of business. I don't know.
23	MS. LEE: Thank you.
24	MS. ALARCON-LOPEZ: Bill Souder.
25	

BILL SOUDER OF BEAUMONT:

MR. SOUDER: My name is Bill Souder, I live in Solera, 55 plus community in Segment 4.

Probably the biggest concern I have is the movement the towers to within 50 feet of the resident property lines. Looking up right now, the smaller of the truss towers is closest, the taller towers are 200 feet away from those properties. So moving a 200 foot tower 50 foot closer to people's backyards, I'm sure will be quite a concern to them. So with a 300 width there, there is lots of room to move them out to center or possibly even to the north side of the 300 foot segment.

electrical engineer, I'm always fascinated by power lines. Every place I have been around the world I have looked at what other counties do. There are some much nicer looking towers, the ones that are more cylindrical or extreme conical actually because they taper more toward the top. But they look more like a pole. I think there are much nicer looking towers, and going through residential areas, I don't know what the cost impact is, but I think they would be worth being better appearing in those areas. So the type of truss could be something that could be

1 looked at. 2 I do have some EMF concerns. Again, moving to 50 feet from 100 feet does not sound good. 3 I realize the levels are supposedly low, but things 4 5 are not always as they are advertised. I'm in an 6 emergency preparedness team in our community and we use handheld walkie-talkies and have practice drills 8 all of the time. And we get 60 cycle hum in our readings, and my house is 1,000 feet away from the 9 current towers and I get 60 cycle hum in my reading. 10 11 So there is something radiating out there. 12 I realize the towers are not matched now 13 because there is a dual circuit in the middle and single circuits on either sides, so perhaps when they 14 15 are put together on the two towers, maybe that gets 16 reduced, but it is a concern. 17 Also, if you would e-mail me the information on the site of the EMF information, I 18 19 would appreciate that. 20 MS. LEE: Okay. 21 Also, moving the towers from MR. SOUDER: 22 100 feet to 50 feet, people are going to be concerned 23 about property values. I don't know myself what the 24 impact will be, but certainly less desirable to have 25 a 200 plus feet tower 50 feet from the backyard than

100 feet. So, you know, if they can actually move it to the north side, then there is still a 100 foot buffer, because there is a 300 width and 100 foot, and they have another 100 buffer over there. So maybe that would move it further away from the houses, which would be nice.

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Another issue is right of way easement agreement. The two agreements are dated 1945 and 1961. We have had run-ins with Edison where we wanted to do some things on that property. Just recently we wanted to, we talked about a putting green, which is grass, no vertical structure and they told us they did not think we could do that. The easements says that agricultural use is acceptable.

I guess what I would like know is, I think the easement agreements on the both sides, 300 foot side and the 100 foot side should be looked at and updated, and they're telling us we cannot do things that are done on either sides of our property. It goes over the park, it goes over RV storage areas, areas where people are active all of the time and they are telling us we cannot do those things. I understand that is their desire, but that is not what the easement agreement says.

I would suggest that they redo an

Τ.	easement agreement and present that to us to agree to
2	it or not. If they want to make more strict
3	conditions, they should have it in writing, not just
4	tell us we cannot do it. They told us they would sue
5	us if we did some of the things we wanted to do. So
6	we are a little unhappy about that.
7	If they are taking the tower down on the
8	100 foot side with 300 foot and moving the towers
9	closer together, something perhaps you could suggest
10	to Edison that they might release the easement
11	agreement. We own the property, but we have the
12	easement agreement that there are certain things we
13	cannot do on. And on that 100 foot side, if they can
14	release that, that would give us a lot of flexibility
15	on things we like to do in our community in
16	landscaping and some smaller structures that we would
17	like put to out. Our clubhouse is on the small side
18	and we would like to expand it.
19	That is it. Thank you.
20	MS. LEE: Those are good comments. I do
21	not think we need any response. They are right on
22	for what we looking for.
23	MS. BLANCHARD: Are you going to give
24	something in writing also?
25	MR. SOUDER: I can fill out this other
	Page 16

1	thing, this form, and send it in.
2	MS. LEE: Great.
3	MS. ALARCON-LOPEZ: Phyllis Lichtenstein.
4	
5	PHYLLIS LICHTENSTEIN OF BEAUMONT:
6	MS. LICHTENSTEIN: I also live in Solera.
7	I know nothing about the electricity anything, but I
8	do have four questions.
9	First one is: Assuming that everything
10	goes as it is planned, how long would the
11	construction within Segment 4 take? Months? Weeks?
12	Years?
13	MS. LEE: That is hard to answer right now,
14	because we're waiting for more detail construction
15	information. The overall project is three to four
16	years from one end of the 45 miles to the other. But
17	with each segment, we do not have the construction
18	time frame yet and we are hoping to get better
19	information.
20	MS. BLANCHARD: We are trying to get more
21	detailed information from Edison regarding this whole
22	construction process.
23	MS. LICHTENSTEIN: Once you know, will it
24	be on the website?
25	MS. LEE: Actually, yes. The data requests
	Page 17

1	in our responses that we get from Edison are on the
2	website. If you look for a section called Data
3	Request, it will be there. And it will be in the
4	draft EIR/EIS, because that is what we really need to
5	do, the kind of detailed analysis that we know a lot
6	of people are asking about.
7	MS. BLANCHARD: We have to look at the
8	construction impacts and operation and maintenance.
9	So it is the whole gamut of things. So we do have to
LO	address what will happen within construction, so that
L1	we need to identify impacts, identify mitigation
L2	measurers, how to deal with it. It will be in the
L3	document.
L4	MS. LICHTENSTEIN: Okay. I think what I'm
	MS. LICHTENSTEIN: Okay. I think what I'm looking at: Are we talking about months for the one
L4	_
L4 L5	looking at: Are we talking about months for the one
L4 L5 L6	looking at: Are we talking about months for the one segment? Are we talking about a year? Are we
L4 L5 L6 L7	looking at: Are we talking about months for the one segment? Are we talking about a year? Are we talking about weeks?
L4 L5 L6 L7	looking at: Are we talking about months for the one segment? Are we talking about a year? Are we talking about weeks? MS. LEE: At least months. And it could
L4 L5 L6 L7 L8	looking at: Are we talking about months for the one segment? Are we talking about a year? Are we talking about weeks? MS. LEE: At least months. And it could be more than a year, because there are three lines to
14 15 16 17 18	looking at: Are we talking about months for the one segment? Are we talking about a year? Are we talking about weeks? MS. LEE: At least months. And it could be more than a year, because there are three lines to be taken out, two lines to install and the lines that
14 15 16 17 18 19	looking at: Are we talking about months for the one segment? Are we talking about a year? Are we talking about weeks? MS. LEE: At least months. And it could be more than a year, because there are three lines to be taken out, two lines to install and the lines that are there now need to remain electrified during the
14 15 16 17 18 19 20 21	looking at: Are we talking about months for the one segment? Are we talking about a year? Are we talking about weeks? MS. LEE: At least months. And it could be more than a year, because there are three lines to be taken out, two lines to install and the lines that are there now need to remain electrified during the whole process. So it's almost like two completely
14 15 16 17 18 19 20 21	looking at: Are we talking about months for the one segment? Are we talking about a year? Are we talking about weeks? MS. LEE: At least months. And it could be more than a year, because there are three lines to be taken out, two lines to install and the lines that are there now need to remain electrified during the whole process. So it's almost like two completely different projects: Build two new lines, build the

1	the question, but we just do not have the information
2	yet. It's not weeks and it's not a few months, for
3	sure.
4	MS. LICHTENSTEIN: Okay. During the
5	construction process, how would it effect, if at all,
6	the homes and the businesses in the area as far as
7	the electrical power ability and outages?
8	MS. LEE: That is part of the reason that
9	Edison will take a long time to construct is they are
10	not going they will have outages segments in the
11	line itself, but I believe that that will not result
12	in any outages to the people who live along the line.
13	This transmission line is a high voltage
14	line, it is not a line that serves local
15	distribution. That power comes from a small
16	substation within the city. So there should not be
17	any direct effect on you. What construction effects
18	you will have are things like noise, dust, trucks
19	driving by. That will be addressed in the
20	environmental document for sure.
21	MS. LICHTENSTEIN: Another question as far
22	as the construction, do you normally when you're
23	doing a big construction like this work at night?
24	MS. LEE: Very rarely. The City
25	regulations will drive the working hours basically.

1	So a lot of cities have a 7:00 to 7:00 weekday
2	construction hours. If that is the case, that is
3	generally what will be requested, what will be
4	enforced.
5	There is some cases where the utility
6	might need an unusual situation to work a couple
7	hours at night, they would have to get the City to
8	okay that. It's not something that would be
9	specifically authorized. But the enviromental report
LO	will be based on compliance with noise requirement of
L1	the local jurisdictions, local cities and counties.
L2	
L3	BILL SOUNDER:
L4	MR. SOUDER: I have follow-up questions.
L5	Listening to the comments here, we do
L6	have a landscape committee and have expressed concern
L7	about the damage that will be done. Unfortunately at
L8	the moment, we only have lawn underneath those
L9	towers, but with all of the trucks moving around, who
20	knows what kind of digging is going on, will whatever
21	is there be replaced by Edison? Or are we just going
22	to wind up with tracks everywhere, holes in things?
23	MS. LEE: Usually that is a requirement
24	that we make, that if they go in an impact an area
25	like that, they have to restore it. So that is
	Page 20

Τ	something that we'll look at and consider on the
2	environmental document.
3	MR. SOUDER: Whenever possible if there is
4	a decision made on that, we would like the feedback.
5	We're holding up other plans not know for sure where
6	towers will be, what kind of damage might occur.
7	MS. LEE: Sure. And if there are projects
8	that you think we ought to consider, anything like
9	what you are talking about, that is something you
10	might want to incorporate in your written comment to
11	us.
12	MR. SOUDER: By projects
13	MS. LEE: What activity. You said you were
14	planning to do something in that area, that might be
15	helpful information for us to justify why you're
16	asking the questions, so to speak, because you will
17	doing initial work in that area.
18	MR. SOUDER: What we are trying to do is
19	remove the lawn and put in drought tolerant plants
20	because our water bill is \$250,000 a year.
21	MS. LEE: Any other comments?
22	
23	THOMAS COVEY:
24	MR. COVEY: I just wonder if you prefer
25	mailing the comment or e-mail?
	Page 21
	1

1 MS. LEE: Whatever you prefer. 2 We did give you this comment form. So if there other comments that you think of, please either 3 mail it in, drop it off in the box or send an e-mail. 4 5 And we have provided all of that information in the 6 materials that you have. 7 Are there any other questions? 8 9 TOM HARRIS: 10 So as Southern California MR. HARRIS: 11 Edison continues on through this preparation project or process I should say, how will be advised, other 12 13 than us going out and taking a look at the website, how will we be advised of the project so that we 14 15 learn well in advance of the final decision being 16 made in the event that we wish to have further 17 discussion? 18 We did present earlier a diagram MS. LEE: 19 where we showed kind of the process that we go 20 through. We're right at the beginning, which is the 21 scoping process. We're taking input, trying to get 22 your comments, ideas. That is going to go into what 23 we call a draft document. And when that draft 24 document is prepared, we send out additional notices 25 to those people on our mailing list, we send out Page 22

1 notices to agencies, also resource agencies, like the Fish and Game, the National Heritage Association, all 2 of that stuff. We send out notices to everyone. 3 We put it in the newspaper. We let people know also 4 5 that we are planning on having additional workshops 6 at that time where we present the draft DIR and take comments. But we do have periodic information that 8 we're going to be giving you so that you have 9 information throughout the process, notices. MS. BLANCHARD: Just to be clear, when we 10 11 notice the draft DIR/EIS is ready for public comment 12 review, we send notices to the entire mailing list, 13 including anybody else that has said they are interested, then we say it's ready for review. And 14 15 then you can review it in a variety of ways, CD, 16 Online, if you need a summary or whether you need 17 hard copy of draft EIR/EIS, whichever way you choose to comment. That will be next real big step in terms 18 19 of reading those, if you like it, do not like it, you will be able to comment on the draft EIR/EIS and give 20 21 us feedback. 22 That is another scoping period. MS. LEE: This was a 30 day scoping period, now we'll have an 23 24 That will be additional public review additional.

period on the draft document.

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MR. HARRIS: Thank you.

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MS. LEE: One other thing I wanted to remind you about is we spoke earlier about the BLM, they will issue a notice of intent so that is when the Federal process starts. And at that time, there is going to be an additional 30 day scoping period on that. So for this project, we are going to have two 30 day scoping points. There will be another 45 day minimum.

MS. BLANCHARD: We have a 30 day scoping period right now for PUC. There will be another 30 day scoping period or Bureau of Land Management, where you again get to go to a scoping meeting and provide any additional scoping comments. That is in June or July, depending on the BLM process. a later time there will be a draft EIR/EIS released to the public where you can review it in any way you need review to, hard copy or e-mail, whatever, Then that is the time period where you get website. to review the document and see whether we have addressed all of the issues properly, we have all the mitigations or not, covered the alternatives, or if you feel we have not, you can comment on that. But what is really helpful right now is we really need people's feedback, and that it is good to comment,

1	but also it is good to get a follow-up from you in
2	writing so we can have all of those issues and can
3	make sure that we do not miss anything in terms of
4	analysis.
5	So I just want to emphasize that. So
6	there is more to come, more periods for comments. So
7	it's a long process.
8	MS. LEE: With that, we appreciate your
9	time. We are going to stick around if you have any
10	additional questions.
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Appendix C

Summary of All Comments

Appendix C-1. Agency/Tribal Government Meeting Notes

These notes include summaries of three meetings:

- Morongo Band of Mission Indians (May 20, 2014)
- City of Redlands (May 20, 2014)
- City of Grand Terrace (May 21, 2014)

1. Morongo Band of Mission Indians

May 20, 2014 - Meeting with Roger Meyer, CEO, and Karen Woodard, Realty Administrator

- Preferred Route and Alternatives on Tribal Land.
 - Looked at 3 to 4 routes for the transmission line, tribal members voted on the preferred route and have accepted the Federal Aviation Administration-required hazard markings.
 - An official but brief response to the CPUC's Data Request will be submitted to the CPUC soon (Note that the CPUC received the letter on May 22, 2014).
 - Package deal on the corridor, and there are no alternatives that the tribe would accept to replace
 the preferred route; the EIR/EIS should not consider alternatives to the agreed upon preferred
 route unless just to dismiss them in the EIR/EIS's Alternatives Screening Report.
 - Tribe has chosen to have SCE install tubular steel poles (TSPs) where they will be most visible to tribal members (from the western end of the Tribal Land to the outlet mall area); however, engineering and construction may require changes from TSP to lattice-steel towers in some locations (e.g., washes).
- Library Repository. For the library repository, use the administration building address, which is 12700 Pumarra Road, Banning CA, 92220
- Future Transmission Lines. Morongo stated that it is not currently discussing future transmission lines within the existing ROW with SCE. However, based on the Tribe's previous discussions with SCE, it is the Tribe's understanding that the 220 kV lines would be on the north and south sides and the potential future single- or double-circuit 500 kV line would be between these two new 220 kV lines. [Note: the preliminary engineering that the CPUC and consultants have received from SCE indicates that the proposed new 220 kV lines would be separated by only about 50 feet in the tribal segment, as they are proposed for much of the rest of the project's length. Therefore, it will not be possible to install any new line between the proposed future lines.] It is possible that the 500 kV line may be routed around the Reservation in this segment.
- No Project/Action Alternative for the EIR/EIS. The renegotiated SCE-Morongo 50-year ROW lease agreement is contingent on the West of Devers Upgrade Project moving forward. Therefore, the No Project/Action Alternative should state that SCE and the Morongo would need to renegotiate their ROW agreement or SCE would have to remove/relocate its existing lines/ROW around the Reservation.
- Cumulative Projects. Cumulative projects that should be considered:
 - Seminole Drive extension, south of Interstate 10
 - Interstate 10 bypass: Banning to Cabazon Project (County of Riverside environmental review process has been completed; contact: Patti Romo)

- Gas-fired power generation facility on the Morongo Reservation (east of the outlet mall). Too far in future to consider, at least 5 years away from development given current Power Purchase Agreement interest from utilities
- Gateway Center Warehouse project proposed in Cherry Valley (in planning, but locally controversial)
- Outdoor Amphitheater for 50,000 to 60,000 people for events like the Coachella Valley Music and Arts Festival.

2. City of Redlands

May 20, 2014 – Meeting with Don Young, Engineering Manager, and two other members of engineering staff, City of Redlands

- Vehicular traffic on Mountain View Avenue is a concern to the City, because of upgrades and staging at San Bernardino Substation. The City asked how big and how many trucks will there be, and what impact will they have to the local roadways?
- The City asked what will be the truck routes (i.e., will trucks use the local roadways or SCE's existing ROW)?
- How will this project mitigate for impacts on local roads? Long-term use of roads break the "cake" (cake and frosting analogy), so damage to local roads needs to be addressed by area in the EIR/EIS, both for construction and operations. Other projects are assessed a per truck charge or fee to address damage to local roads

■ Cumulative Projects to Consider include:

- Mountain View Avenue Widening Project (by Inland Valley Development Agency). This project has
 created some restrictions that should be considered in the EIR/EIS, such as restrictions on left turns
 along some areas of this project; may need to install traffic signals to address impacts
- Aggressive city-wide paving program will be conducted in the City that may be impacted by the WOD project; within next 3 to 5 years will be paving 2/3 of the streets and other locations throughout the City (640 lane miles)
- Water project is also underway that will affect paving; Inland Valley Development Agency part of the Norton Air Force Base Reuse project
- Alabama Street street will be widened and the electrical poles (near the K-Mart) will be relocated to accommodate this widening project; this will be done by November 2014
- Redlands Passenger Rail along Alabama Street (2017-2019); NOP has been issued through SanBAG (San Bernardino Association of Governments)
- Citrus Plaza, Phase II, in unincorporated San Bernardino County north of Lugonia Avenue, should also be considered in the cumulative scenario; grading/construction is underway
- Send detailed map book pages and draft meeting notes/comments to Don Young for review and concurrence before including in the scoping report
- Send the cumulative project request to the Engineering Department for capital projects (in addition to the Planning Department) at the City of Redlands.

3. City of Grand Terrace

May 21, 2014 – Meeting with Kenneth Henderson, Interim City Manager, and Sandra Molina, Deputy Director of Community Development

- The CPUC gave a brief summary of the project, explained that SCE's application has not been deemed complete, and summarized the City of Redlands' concerns regarding potential traffic and roadway impacts.
- The City of Grand Terrace worked with the City of Colton on the Washington Street/Mt Vernon Avenue Interchange (I-215) Project, located behind the existing shopping center, which is in California gnatcatcher habitat as well as a potential landslide area.
- Slope stability is an issue where the towers are currently located near the border of Grand Terrace and Colton; a house deck collapsed recently from slope failure. The CPUC stated that these issues would be addressed in the EIR/EIS.
- The City stated that its biggest concerns will likely be the heights of the new towers and construction effects, and requested that the CPUC provide a tower by tower height comparison table showing existing tower heights compared with proposed heights, and copies of applicable map book pages.
- The City is concerned with dust mitigation during construction due to high winds in the area, and asked whether the construction would abide by local requirements. The CPUC stated that dust suppression would be in accordance with the local air district and that the CPUC has a Mitigation Monitoring, Compliance, and Reporting Program that Aspen Environmental Group will monitor in the field during construction.
- The City asked whether construction hours would be during the day. The CPUC said that the project would be in accordance with local noise ordinances and SCE would need exemptions at the discretion of local agencies to perform after-hours work. Additionally, the CPUC usually requires mitigation for construction notification and a hotline for public questions and complaints.
- The City said that it would submit a list of cumulative projects, including both capital and development projects
- The City asked if the CPUC is considering routing alternatives. Given the existing corridor and the route on Tribal land that is specified by the Morongo Band of Mission Indians, the CPUC said that it will primarily be looking at redesign of tower locations or underground alternatives in certain segments, among others. It was noted that the southern existing transmission corridor through Grand Terrace (which is unaffected by the West of Devers Upgrade Project) could potentially be the location of future transmission upgrades by SCE.
- The City stated that it is impressed with the positive and proactive outreach by the CPUC.
- The City mentioned that they were meeting with the City of Colton and may be submitting joint comments on this project

Date	From	Comments
State Age	ncies	
June 5, 2014	California Department of Water Resources David M. Samson State Water Project Operations Support Office Division of Operations and Maintenance	 Project will cross DWRs ROW near Barton Road along West of Devers at MP1 in community of Grand Terrace Improvements that encroach or impact ROW will require review and possible permit from DWR Provide subsequent environmental documents to specific contact noted in letter, and keep DWR informed about the project
June 12, 2014	California Department of Fish and Wildlife Ali Abhili Senior Environmental Scientist	 Trustee Agency for fish and wildlife resources EIR/EIS should include sufficient, specific, and current biological information on existing habitat and species Species-specific surveys may be necessary; document should present current data EIR/EIS must consider project's consistency with approved habitat conservation plans in the project area; 2 plans cover the project area Permittee must demonstrate consistency with both plans; the letter includes a brief discussion of the procedures for obtaining compliance with the plans Document must also consider project's impact on streambeds and need for Lake or Streambed Alteration; letter outlines the information that should be considered All direct and indirect cumulative impacts to biological resources must be considered Analyze a full range of alternatives including ones that reduce biological impacts of project Address off-site compensation for unavoidable impacts and acquisition/ protection of high-quality habitat Consider these issues in the EIR: Quantify impacts to habitats and species; provide map Use recent surveys conducted in appropriate time of year; consult CNDD; consult agency survey protocols and guidance documents, including those of the USFWS Provide analysis of habitat conservation plans Analysis should be consistent with LSA and CESA requirements Obtain ITP if project results in "take" of State-listed species; early consultation is recommended Thorough analysis of direct, indirect, and cumulative impacts Analyze a range of alternatives to the project
Special D		
May 27, 2014	South Coast Air Quality Management District Ed Eckerle Program Supervisor	 Comments are recommendations regarding analysis of potential air quality impacts Send copy of the Draft EIR when complete with appendices and technical documents Use SCAQMD Air Quality Handbook (1993) for guidance on air quality analysis Impacts from construction, operation, and demolition should be calculated as well as direct and indirect sources Use SCAQMD regional and localized significance thresholds If project will have heavy-duty diesel-fueled vehicles recommend a mobile source health risk assessment Refer to SCAQMD guidance documents for possible mitigation measures for the project SCQAMD website includes rules, reports and data

Date	From	Comments
June 11, 2014	Metropolitan Water District Deirdre West Manager, Environmental Planning Team	 Colorado River Aqueduct (CRA) extends in east-west direction and is bisected by proposed project (MP38, MP42) Project could interfere with ongoing operation, maintenance, and repair activities on the CRA EIR/EIS must evaluate potential impacts of MWD facilities and fully mitigate Require design plans for any activity near MWD pipelines or facilities; MWD must approve design plans for portions that could impact facilities Letter provides information on how to obtain information on MWD facilities from the Substructure Information Line Letter includes "Guidelines for Developments in Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California"
Local Age	encies	
June 4, 2014	County of San Bernardino Sundaramoorthy Srirajan, P.E. Public Works Engineer III Environmental Management	 Appreciate the opportunity to provide comments when more information is available regarding hydrology and water quality
June 11, 2014	City of Colton Mark R. Tomich Development Services Director	 Taller, wider towers and larger conductor may significantly impact scenic vistas in the city Two additional towers (D-V6 and D-V12) will be highly visible from nearby residential areas and heavily traveled roadways including Mount Vernon Ave., Barton Road, and I-215; need detailed visual simulations Undergrounding should be considered as mitigation Project may impede residential development with Reche Canyon by creating physical barrier and requiring greater setbacks; review City's General Plan, Zoning Code and Reche Canyon Specific Plan Expanded corridor may increase fire risk; consider impacts of risk of fire and mitigation such as emergency response plan and undergrounding to remove risk of fire Analyze impact of road closures and limited access in the cities of Colton and Grand Terrace Consider impacts to recreation trails and off-road activities and the limitation of recreational connectivity between Colton and Grand Terrace Slope stability and erosion must be considered especially property acquired by Grand Terrace because of geological stability issues Short- and long-term impacts must be considered and because of high winds in the area include dust suppression measures Short- and long-term noise impacts must be adequately evaluated and mitigated.
June 11, 2014	City of Banning Zai Abu Bakar Community Development Director	 Provide specific information on: Structures to be removed and their locations Structures to be upgraded and their locations Structures that would be relocated and their locations Timeline for the start and completion of above items Confirm whether towers at East Pit of Robertson's Mine will be relocated, at NE corner of Banning corporate boundary to west of MP 30 Need more detail in order to determine how the project impacts existing and future land uses in city

Date	From	Comments
June 12, 2014	City of Grand Terrace Sandra Molina Community Development Director	 Taller, more massive towers are proposed to support heavier conductors two additional towers (D-V6 and D-V12) proposed near Grand Terrace and Colton; towers will be highly visible from two heavily-traveled roads (Mount Vernon Avenue and Barton Road) Need thorough analysis of visual impacts including simulations and undergrounding as mitigation Project close to residences and commercial areas; assess short and long term noise impacts; no construction from 7 pm to 7 am Must consider road closures and limited access in EIR/EIS California gnatcatcher and its habitat in Segment 2. Potential impacts must be assess and mitigated Slope stability and erosion must be considered; Mount Vernon slope has experienced stability issues and area has open undeveloped hillsides Must consider airborne dust and construction vehicle emissions; area experiences high winds, mitigate with dust suppression measures Expanded corridor may increase fire risk in open undeveloped areas; issue must be considered and mitigate with emergency response plan, enhanced fire protection and undergrounding to remove fire risk Consider impacts to recreation trails and off-road activities and the limitation of recreational connectivity between Colton and Grand Terrace

Date	From	Comments
May 12, 2014	Cherry Valley Lakes Resort Randy Wright	 No objection as long as proposed project does not adversely affect current RV storage in project area Stored RVs in project area for over 10 years
June 4, 2014	Southern California Gas Company Anthony A. Klecha Principal Environmental Scientist	 Project crosses over 2 dozen SCG distribution pipelines and 3 natural gas transmission pipelines as described in letter Applicant should call Underground Service Alert at least 2 business days prior to performing any excavation work If any SCG facilities need to be abandoned then the EIR/EIS must consider potential impacts of this work
June 9, 2014	San Gorgonio Farms Inc. Bradford W. Adams Vice President	 Letter prepared on behalf of 5 energy and other organizations Notice fails to address severe impacts that need to be addressed and mitigated; effect of curtailing existing power plants specifically renewable energy projects for several years without reimbursement Address in all or one of these – land use, socioeconomics, public health and safety, public services and utilities SCE will allow companies not on grid to sell their power to the market SCE will take existing power lines out of service for upgrade and will curtail existing suppliers SCE proposes to stop payments; notice to stop generating or reduce generation without regard for debt obligations, PPA, or other issues This has negative trickle-down affect to land owners, other entities SCE should compensate affected generators for lost production WOD is not for system reliability or for maintenance; upgrades to allow new generators to interconnect to the system Request SCE to mitigate damages to renewable generators, and that the construction schedule limit the amount of time for curtailment and require construction at low generation times (Oct-Feb)
June 12, 2014	Painted Hills Wind Developers Brian Halloran	 Painted Hills owns and operates a 19 MW wind project in Riverside County and in vicinity of Devers Substation Same comments as noted above for San Gorgonio Farms Inc.
June 12, 2014	Desert Wind Energy Association Fredrick W. Noble Chairman	 Coachella Valley wind energy projects - 500 MW of installed capacity Local landowners implored to build wind farms by SCE to facilitate licensing of San Onofre reactor No. 2; SCE has turned on wind farms – Edison's guerrilla war against wind energy Now SCE wants to unnecessarily curtail wind projects PUC should not allow SCE to get rid of wind projects Other comments the same as noted above for San Gorgonio Farms Inc.
June 12, 2014	BayWa r.e. Renewable Energy Kat Valentine Assistant Project Manager	 No discussion of proposed mitigation to existing generators affected by curtailment with proposed upgrades Curtailing existing generators for up to 4 years without reimbursement is a severe impact that needs to be mitigated Has lost money from previous curtailments at the Devers Substation; an additional 4 years to benefit new energy facilities at the expense of existing generators is untenable and discriminatory Construction should be done at low generation time, minimize during peak energy producing times (Oct-Feb) and bring one line on as soon as possible to carry load of existing lines Compensate existing generators that have been in service and will continue to be in service

Appendi	Appendix C-3. Summary of Written Comments Received from Organizations and Companies		
Date	From	Comments	
June 12, 2014	Energy Unlimited, Inc. David S. Lamm, Esq. EUI President	 Operate a 25 MW wind power generator facility 2 miles west of SCE Devers substation Need to address costs and damages resulting from curtailing projects in immediate area of project Need a plan for mitigating the curtailment related losses Turning wind facilities off and on creates a safety concern especially in high winds, shutting down substations also a safety concern If curtailment occurs on windy days, will lose production revenue, not able to store power we do not sell Uncompensated curtailment in spring and summer can have devastating impact on ability to fund operations Mitigate damages to existing renewable generators Construction should be done at low generation time, minimize during peak energy producing times (Oct-Feb) 	

Appendix C-4. Summary of Written Comments Received from Tribal Governments		
Date From		Comments
May 29, 2014	Cabazon Band of Mission Indians Judy Stapp Director of Cultural Affairs	 Project is located outside Cabazon Reservation lands. No specific archival information on cultural activity or Native American burial or religious sites

Date	From	Comments
May 19, 2014	Joel and Virginia Mendoza	 Comments translated from Spanish We don't speak English The electrical towers pass less than 200 feet from my house We have two young sons that play under the transmission lines, we want to know if there is a high risk of danger or if an accident were to happen who is responsible to resolve the problem. Thank you for your attention.
May 19, 2014	Edward Miller	 Is there any effect of the project on the connection to the Banning electric utility?
May 22, 2014	Robert Wyser	 Not able to attend meeting in Loma Linda Have 4 transmission towers on land, they will be replaced by 4 new towers Need clarification of terms in Agricultural resources: temporary, potential, and long-term impacts Interested in assessment and solutions to removal of orange trees and damage to other trees in making room for new towers Concerned with statement: "Project would potentially converted farmland to non-agricultural use" – will zoning be changed? Provide approximate schedule or time table for relocating towers
May 29, 2014	Bill Souder	 Comments also presented at Beaumont scoping meeting Currently towers are ~100 feet from property but new towers will be closer; there should be compensation to property owners; move towers on the north side of corridor away from houses Use pole-type towers instead of the truss style EMF needs to be evaluated SCE should revisit easement agreements and come to new agreement with property owners; should allow parks, RV storage, and other uses; provide latest copies of easement language SCE should be required to restore landscaping after construction If SCE is abandoning 100 feet of ROW on the north side, this area should be relinquished back to property owners Association has considered outdoor concert area, additional parking, replacing grass with plants, and game courts in the easement.
June 4, 2014	Steve Ferguson	 Concerned with replacement towers; new towers (D-V117 and DEC-10) will be more obtrusive Move towers away from homes and to the middle of the corridor or on the north side, please consider this to help homeowners
June 11, 2014	Vincent and Martha van Rooijen	 Live near segment 4, towers are already too close to our home they do not need to be moved closer Deny project, move project, or underground this nightmare they are dropping on our homes Negatively impacted because SCE wants to replace existing towers with taller towers and they want to install 50' from ROW where it is steep and close to our property Space is only buffer and they are taking that away Will suffer from unmitigated noise, severe visual impacts, slope destabilization, EMF, air quality, loss of buffer, fire threats, loss of wildlife and vegetation, loss of habitat, dust, access roads SCE is piecemealing, trying to escape cumulative and growth-inducing review under CEQA Look at the decision for El Casco, which removed a potential route near our house – found to be infeasible by CPUC

Date	From	Comments
		 New application for WOD is a mirror of former rejected, infeasible Northerly Route option; why wasn't the need for additional capacity brought up in the El Casco project; piecemealing the system Plans show 200' on north side of corridor; obvious that they will come in again for the 200 feet on northern hillside and further intensify the towers, where there is 1 there will be 4 Northerly Route (Option 3) was found to have more receptors (our homes) and would unavoidable noise, visual, air quality, biological resources, hazards and fire impacts (page ES-42) All of the issues identified in Table ES-2 of the El Casco ElR should be addressed Request that agencies meet with the Fairway Canyon HOA Make the project a topic of the monthly "Beaumont Cares" meeting sponsored by the City at city hall Letter provides suggestions for newspapers and websites to place project information Letter provides 18 issues that it believes need detailed studies including environmental impacts noted above, cumulative impacts, growth-inducing effects, alternatives, and effective mitigation Alternatives suggested: Move to El Casco route; route that merges with Morongo line but does no affect homes If can't find route that does not affect homes then it needs to go underground; CPUC needs to flexible on undergrounding Move towers 200' on north side hill where there are no homes If vacant property on north side gets develops, the developer can plan a better buffer from homes rather than having no options Make SCE accountable for not addressing this route in the El Casco application and review; if SCE knew they wanted both lines then deny this project and make them provide projects in full Need rules on piecemealing Letter includes photos of the towers location near Hagen Heights homes in Beaumont Find another route or underground
 June 12, Hors	st Schnur	Opposed to project, it is too close to my house; should not be able to move
2014		 Move route, underground project, or move 200 feet on other side of hill near vacant land

Name & Organization	Comments
	2014 (6:00 pm to 8:00 pm) – Banning, CA
David Doherty	 Plan shows towers will move 35 feet south, which is right across from my back yard; footings have been marked and show that the tower (DEC106) will be right next to my house Why move closer to homes when there is vacant land behind me Submitted pictures of his property for consideration in the EIR/EIS
Edward Miller	 Banning has its own electric utility; will there be any change in the connection of these power lines to the utility?
Susan Savolainen	 Projected length of time from one segment to another? No mention of the Migratory Bird Treaty Act Are public routes of transit going to be identified?
Scoping Meeting, Mary 20,	2014 (6:00 pm to 8:00 pm) – Loma Linda, CA
Linda Rehm Corporate Business Center Property Manager	 Corporate Business Center consists of 31 office industrial buildings right off of Mountain View Avenue Want verification that we are in segment 2 of project, and if in this segment we would find out on the map where our location is in relation to the project Owner wants to know if the towers currently on his property will be replaced; what would the sizes be of the new towers?
Bill Olinger	 Live at base of Loma Linda hills; see towers from front yard Will towers be replaced with larger ones? Will visual impact be tremendous on the hills? Will there be lengthy road closures in residential areas or lots of construction noise?
Terrence Emershy	 Slide showed removal of 116 towers in San Timoteo Canyon and replace with 133 towers, where will towers go Family has property in San Timoteo Canyon in Segment 3
Scoping Meeting, May 21, 2	2014 (3:00 pm to 5:00 pm) – Beaumont, CA
Patrick Rafter	 Can this power line be placed underground? Has it been considered? Asking that undergrounding the line be considered, it is safer not only for public but for SCE too
Eric Johnson Wagner Wind Power (Palm Springs) and Baywa Energy Group	 Do not see any mitigation for existing energy producers that are going to suffer serious curtailments over the next 3 to 4 years Possibly an issue with PPAs also
Lanny Swerdlow	 Some of the transmission lines are on my property, what effect will it cause for me using the property after it is done?
Scoping Meeting, May 21, 2	2014 (7:00 pm to 9:00 pm) – Beaumont, CA
Tom Harris	 Have property in San Mateo Canyon, 10 acres, towers in rear portion SCE included mitigation measures in their application but mitigation measure have not yet beer proposed? I understand we will have an opportunity to review mitigation measures at some point. Aesthetics is very important, how much of a voice do I have on placement of the towers, currently there are 3 towers Want to explore possibility of shifting towers back in 400-foot ROW so they are less prominent to me What will be mitigated with regard to EMF, distance and placement from each other (towers) How will we be advised about the project from this point forward?

Name & Organization	 Comments I live near segment 6, MP 45, right at Devers Substation; I did not receive the notice Live very close to substation, have lived there for 30 years, my property is worthless, need to address as socioeconomic issue Address public health and safety along with EMF Have a recording studio/record label; substation not at full capacity, when at full capacity I will be out of business Concerned with cumulative impact of this stuff going in Concerned with safety of clients, have million-dollar rock stars coming to business, afraid somebody will get electrocuted Do you prefer comments in the mail or email? 	
Thomas Covey		
Bill Souder	 Biggest concern is moving towers within 50 feet of residential property lines Corridor has lots of room to move towers to the center or to the north Pole-type towers are much nicer looking towers, don't know cost but these poles should be considered EMF is a concern; would like information on EMF mentioned earlier and on the project website People will be concerned with property values with the towers being moved closer to homes; move towers to the north side of ROW We have had run-ins with SCE regarding the use of the easement; easements should be updated because we would like to have flexibility on the use of the easement Will SCE replace landscaping that it removes? 	
Phyllis Lichtenstein	 How long will construction take in Segment 4? Months? Weeks? Years? During construction how will the project effect businesses and homes as far as electrical power ability and outages? Will construction be done at night? 	

Agency and Tribal Government Meeting Notes

Appendix C-1. Agency/Tribal Government Meeting Notes

These notes include summaries of three meetings:

- Morongo Band of Mission Indians (May 20, 2014)
- City of Redlands (May 20, 2014)
- City of Grand Terrace (May 21, 2014)

1. Morongo Band of Mission Indians

May 20, 2014 - Meeting with Roger Meyer, CEO, and Karen Woodard, Realty Administrator

- Preferred Route and Alternatives on Tribal Land.
 - Looked at 3 to 4 routes for the transmission line, tribal members voted on the preferred route and have accepted the Federal Aviation Administration-required hazard markings.
 - An official but brief response to the CPUC's Data Request will be submitted to the CPUC soon (Note that the CPUC received the letter on May 22, 2014).
 - Package deal on the corridor, and there are no alternatives that the tribe would accept to replace
 the preferred route; the EIR/EIS should not consider alternatives to the agreed upon preferred
 route unless just to dismiss them in the EIR/EIS's Alternatives Screening Report.
 - Tribe has chosen to have SCE install tubular steel poles (TSPs) where they will be most visible to tribal members (from the western end of the Tribal Land to the outlet mall area); however, engineering and construction may require changes from TSP to lattice-steel towers in some locations (e.g., washes).
- Library Repository. For the library repository, use the administration building address, which is 12700 Pumarra Road, Banning CA, 92220
- Future Transmission Lines. Morongo stated that it is not currently discussing future transmission lines within the existing ROW with SCE. However, based on the Tribe's previous discussions with SCE, it is the Tribe's understanding that the 220 kV lines would be on the north and south sides and the potential future single- or double-circuit 500 kV line would be between these two new 220 kV lines. [Note: the preliminary engineering that the CPUC and consultants have received from SCE indicates that the proposed new 220 kV lines would be separated by only about 50 feet in the tribal segment, as they are proposed for much of the rest of the project's length. Therefore, it will not be possible to install any new line between the proposed future lines.] It is possible that the 500 kV line may be routed around the Reservation in this segment.
- No Project/Action Alternative for the EIR/EIS. The renegotiated SCE-Morongo 50-year ROW lease agreement is contingent on the West of Devers Upgrade Project moving forward. Therefore, the No Project/Action Alternative should state that SCE and the Morongo would need to renegotiate their ROW agreement or SCE would have to remove/relocate its existing lines/ROW around the Reservation.
- Cumulative Projects. Cumulative projects that should be considered:
 - Seminole Drive extension, south of Interstate 10
 - Interstate 10 bypass: Banning to Cabazon Project (County of Riverside environmental review process has been completed; contact: Patti Romo)

- Gas-fired power generation facility on the Morongo Reservation (east of the outlet mall). Too far in future to consider, at least 5 years away from development given current Power Purchase Agreement interest from utilities
- Gateway Center Warehouse project proposed in Cherry Valley (in planning, but locally controversial)
- Outdoor Amphitheater for 50,000 to 60,000 people for events like the Coachella Valley Music and Arts Festival.

2. City of Redlands

May 20, 2014 – Meeting with Don Young, Engineering Manager, and two other members of engineering staff, City of Redlands

- Vehicular traffic on Mountain View Avenue is a concern to the City, because of upgrades and staging at San Bernardino Substation. The City asked how big and how many trucks will there be, and what impact will they have to the local roadways?
- The City asked what will be the truck routes (i.e., will trucks use the local roadways or SCE's existing ROW)?
- How will this project mitigate for impacts on local roads? Long-term use of roads break the "cake" (cake and frosting analogy), so damage to local roads needs to be addressed by area in the EIR/EIS, both for construction and operations. Other projects are assessed a per truck charge or fee to address damage to local roads

■ Cumulative Projects to Consider include:

- Mountain View Avenue Widening Project (by Inland Valley Development Agency). This project has
 created some restrictions that should be considered in the EIR/EIS, such as restrictions on left turns
 along some areas of this project; may need to install traffic signals to address impacts
- Aggressive city-wide paving program will be conducted in the City that may be impacted by the WOD project; within next 3 to 5 years will be paving 2/3 of the streets and other locations throughout the City (640 lane miles)
- Water project is also underway that will affect paving; Inland Valley Development Agency part of the Norton Air Force Base Reuse project
- Alabama Street street will be widened and the electrical poles (near the K-Mart) will be relocated to accommodate this widening project; this will be done by November 2014
- Redlands Passenger Rail along Alabama Street (2017-2019); NOP has been issued through SanBAG (San Bernardino Association of Governments)
- Citrus Plaza, Phase II, in unincorporated San Bernardino County north of Lugonia Avenue, should also be considered in the cumulative scenario; grading/construction is underway
- Send detailed map book pages and draft meeting notes/comments to Don Young for review and concurrence before including in the scoping report
- Send the cumulative project request to the Engineering Department for capital projects (in addition to the Planning Department) at the City of Redlands.

3. City of Grand Terrace

May 21, 2014 – Meeting with Kenneth Henderson, Interim City Manager, and Sandra Molina, Deputy Director of Community Development

- The CPUC gave a brief summary of the project, explained that SCE's application has not been deemed complete, and summarized the City of Redlands' concerns regarding potential traffic and roadway impacts.
- The City of Grand Terrace worked with the City of Colton on the Washington Street/Mt Vernon Avenue Interchange (I-215) Project, located behind the existing shopping center, which is in California gnatcatcher habitat as well as a potential landslide area.
- Slope stability is an issue where the towers are currently located near the border of Grand Terrace and Colton; a house deck collapsed recently from slope failure. The CPUC stated that these issues would be addressed in the EIR/EIS.
- The City stated that its biggest concerns will likely be the heights of the new towers and construction effects, and requested that the CPUC provide a tower by tower height comparison table showing existing tower heights compared with proposed heights, and copies of applicable map book pages.
- The City is concerned with dust mitigation during construction due to high winds in the area, and asked whether the construction would abide by local requirements. The CPUC stated that dust suppression would be in accordance with the local air district and that the CPUC has a Mitigation Monitoring, Compliance, and Reporting Program that Aspen Environmental Group will monitor in the field during construction.
- The City asked whether construction hours would be during the day. The CPUC said that the project would be in accordance with local noise ordinances and SCE would need exemptions at the discretion of local agencies to perform after-hours work. Additionally, the CPUC usually requires mitigation for construction notification and a hotline for public questions and complaints.
- The City said that it would submit a list of cumulative projects, including both capital and development projects
- The City asked if the CPUC is considering routing alternatives. Given the existing corridor and the route on Tribal land that is specified by the Morongo Band of Mission Indians, the CPUC said that it will primarily be looking at redesign of tower locations or underground alternatives in certain segments, among others. It was noted that the southern existing transmission corridor through Grand Terrace (which is unaffected by the West of Devers Upgrade Project) could potentially be the location of future transmission upgrades by SCE.
- The City stated that it is impressed with the positive and proactive outreach by the CPUC.
- The City mentioned that they were meeting with the City of Colton and may be submitting joint comments on this project

Date	From	Comments
State Age	encies	
June 5, 2014	California Department of Water Resources David M. Samson State Water Project Operations Support Office Division of Operations and Maintenance	 Project will cross DWRs ROW near Barton Road along West of Devers at MP1 in community of Grand Terrace Improvements that encroach or impact ROW will require review and possible permit from DWR Provide subsequent environmental documents to specific contact noted in letter, and keep DWR informed about the project
June 12, 2014	California Department of Fish and Wildlife Ali Abhili Senior Environmental Scientist	 Trustee Agency for fish and wildlife resources EIR/EIS should include sufficient, specific, and current biological information on existing habitat and species Species-specific surveys may be necessary; document should present current data EIR/EIS must consider project's consistency with approved habitat conservation plans in the project area; 2 plans cover the project area Permittee must demonstrate consistency with both plans; the letter includes a brief discussion of the procedures for obtaining compliance with the plans Document must also consider project's impact on streambeds and need for Lake or Streambed Alteration; letter outlines the information that should be considered All direct and indirect cumulative impacts to biological resources must be considered Analyze a full range of alternatives including ones that reduce biological impacts of project Address off-site compensation for unavoidable impacts and acquisition/ protection of high-quality habitat Consider these issues in the EIR: Quantify impacts to habitats and species; provide map Use recent surveys conducted in appropriate time of year; consult CNDD; consult agency survey protocols and guidance documents, including those of the USFWS Provide analysis of habitat conservation plans Analysis should be consistent with LSA and CESA requirements Obtain ITP if project results in "take" of State-listed species; early consultation is recommended Thorough analysis of direct, indirect, and cumulative impacts Analyze a range of alternatives to the project
Special D	istricts	
May 27, 2014	South Coast Air Quality Management District Ed Eckerle Program Supervisor	 Comments are recommendations regarding analysis of potential air quality impacts Send copy of the Draft EIR when complete with appendices and technical documents Use SCAQMD Air Quality Handbook (1993) for guidance on air quality analysis Impacts from construction, operation, and demolition should be calculated as well as direct and indirect sources Use SCAQMD regional and localized significance thresholds If project will have heavy-duty diesel-fueled vehicles recommend a mobile source health risk assessment Refer to SCAQMD guidance documents for possible mitigation measures for the project SCQAMD website includes rules, reports and data

Date	From	Comments
June 11, 2014	Metropolitan Water District Deirdre West Manager, Environmental Planning Team	 Colorado River Aqueduct (CRA) extends in east-west direction and is bisected by proposed project (MP38, MP42) Project could interfere with ongoing operation, maintenance, and repair activities on the CRA EIR/EIS must evaluate potential impacts of MWD facilities and fully mitigate Require design plans for any activity near MWD pipelines or facilities; MWD must approve design plans for portions that could impact facilities Letter provides information on how to obtain information on MWD facilities from the Substructure Information Line Letter includes "Guidelines for Developments in Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California"
Local Age	encies	
June 4, 2014	County of San Bernardino Sundaramoorthy Srirajan, P.E. Public Works Engineer III Environmental Management	 Appreciate the opportunity to provide comments when more information is available regarding hydrology and water quality
June 11, 2014	City of Colton Mark R. Tomich Development Services Director	 Taller, wider towers and larger conductor may significantly impact scenic vistas in the city Two additional towers (D-V6 and D-V12) will be highly visible from nearby residential areas and heavily traveled roadways including Mount Vernon Ave., Barton Road, and I-215; need detailed visual simulations Undergrounding should be considered as mitigation Project may impede residential development with Reche Canyon by creating physical barrier and requiring greater setbacks; review City's General Plan, Zoning Code and Reche Canyon Specific Plan Expanded corridor may increase fire risk; consider impacts of risk of fire and mitigation such as emergency response plan and undergrounding to remove risk of fire Analyze impact of road closures and limited access in the cities of Colton and Grand Terrace Consider impacts to recreation trails and off-road activities and the limitation of recreational connectivity between Colton and Grand Terrace Slope stability and erosion must be considered especially property acquired by Grand Terrace because of geological stability issues Short- and long-term impacts must be considered and because of high winds in the area include dust suppression measures Short- and long-term noise impacts must be adequately evaluated and mitigated.
June 11, 2014	City of Banning Zai Abu Bakar Community Development Director	 Provide specific information on: Structures to be removed and their locations Structures to be upgraded and their locations Structures that would be relocated and their locations Timeline for the start and completion of above items Confirm whether towers at East Pit of Robertson's Mine will be relocated, at NE corner of Banning corporate boundary to west of MP 30 Need more detail in order to determine how the project impacts existing and future land uses in city

Date	From	Comments
June 12, 2014	City of Grand Terrace Sandra Molina Community Development Director	 Taller, more massive towers are proposed to support heavier conductors two additional towers (D-V6 and D-V12) proposed near Grand Terrace and Colton; towers will be highly visible from two heavily-traveled roads (Mount Vernon Avenue and Barton Road) Need thorough analysis of visual impacts including simulations and undergrounding as mitigation Project close to residences and commercial areas; assess short and long term noise impacts; no construction from 7 pm to 7 am Must consider road closures and limited access in EIR/EIS California gnatcatcher and its habitat in Segment 2. Potential impacts must be assess and mitigated Slope stability and erosion must be considered; Mount Vernon slope has experienced stability issues and area has open undeveloped hillsides Must consider airborne dust and construction vehicle emissions; area experiences high winds, mitigate with dust suppression measures Expanded corridor may increase fire risk in open undeveloped areas; issue must be considered and mitigate with emergency response plan, enhanced fire protection and undergrounding to remove fire risk Consider impacts to recreation trails and off-road activities and the limitation of recreational connectivity between Colton and Grand Terrace

Summary of Written Comments Received from Organizations and Companies

Date	From	Comments
May 12, 2014	Cherry Valley Lakes Resort Randy Wright	 No objection as long as proposed project does not adversely affect current RV storage in project area Stored RVs in project area for over 10 years
June 4, 2014	Southern California Gas Company Anthony A. Klecha Principal Environmental Scientist	 Project crosses over 2 dozen SCG distribution pipelines and 3 natural gas transmission pipelines as described in letter Applicant should call Underground Service Alert at least 2 business days prior to performing any excavation work If any SCG facilities need to be abandoned then the EIR/EIS must consider potential impacts of this work
June 9, 2014	San Gorgonio Farms Inc. Bradford W. Adams Vice President	 Letter prepared on behalf of 5 energy and other organizations Notice fails to address severe impacts that need to be addressed and mitigated; effect of curtailing existing power plants specifically renewable energy projects for several years without reimbursement Address in all or one of these – land use, socioeconomics, public health and safety, public services and utilities SCE will allow companies not on grid to sell their power to the market SCE will take existing power lines out of service for upgrade and will curtail existing suppliers SCE proposes to stop payments; notice to stop generating or reduce generation without regard for debt obligations, PPA, or other issues This has negative trickle-down affect to land owners, other entities SCE should compensate affected generators for lost production WOD is not for system reliability or for maintenance; upgrades to allow new generators to interconnect to the system Request SCE to mitigate damages to renewable generators, and that the construction schedule limit the amount of time for curtailment and require construction at low generation times (Oct-Feb)
June 12, 2014	Painted Hills Wind Developers Brian Halloran	 Painted Hills owns and operates a 19 MW wind project in Riverside County and in vicinity of Devers Substation Same comments as noted above for San Gorgonio Farms Inc.
June 12, 2014	Desert Wind Energy Association Fredrick W. Noble Chairman	 Coachella Valley wind energy projects - 500 MW of installed capacity Local landowners implored to build wind farms by SCE to facilitate licensing of San Onofre reactor No. 2; SCE has turned on wind farms – Edison's guerrilla war against wind energy Now SCE wants to unnecessarily curtail wind projects PUC should not allow SCE to get rid of wind projects Other comments the same as noted above for San Gorgonio Farms Inc.
June 12, 2014	BayWa r.e. Renewable Energy Kat Valentine Assistant Project Manager	 No discussion of proposed mitigation to existing generators affected by curtailment with proposed upgrades Curtailing existing generators for up to 4 years without reimbursement is a severe impact that needs to be mitigated Has lost money from previous curtailments at the Devers Substation; an additional 4 years to benefit new energy facilities at the expense of existing generators is untenable and discriminatory Construction should be done at low generation time, minimize during peak energy producing times (Oct-Feb) and bring one line on as soon as possible to carry load of existing lines Compensate existing generators that have been in service and will continue to be in service

Appendix C-3. Summary of Written Comments Received from Organizations and Companies		
Date	From	Comments
June 12, 2014	Energy Unlimited, Inc. David S. Lamm, Esq. EUI President	 Operate a 25 MW wind power generator facility 2 miles west of SCE Devers substation Need to address costs and damages resulting from curtailing projects in immediate area of project Need a plan for mitigating the curtailment related losses Turning wind facilities off and on creates a safety concern especially in high winds, shutting down substations also a safety concern If curtailment occurs on windy days, will lose production revenue, not able to store power we do not sell Uncompensated curtailment in spring and summer can have devastating impact on ability to fund operations Mitigate damages to existing renewable generators Construction should be done at low generation time, minimize during peak energy producing times (Oct-Feb)

Summary of Written Comments Received from Tribal Governments

Appendix C-4. Summary of Written Comments Received from Tribal Governments		
Date	From	Comments
May 29, 2014	Cabazon Band of Mission Indians Judy Stapp Director of Cultural Affairs	 Project is located outside Cabazon Reservation lands. No specific archival information on cultural activity or Native American burial or religious sites

Summary of Written Comments Received from Private Citizens

Date	From	Comments
May 19, 2014	Joel and Virginia Mendoza	 Comments translated from Spanish We don't speak English The electrical towers pass less than 200 feet from my house We have two young sons that play under the transmission lines, we want to know if there is a high risk of danger or if an accident were to happen who is responsible to resolve the problem. Thank you for your attention.
May 19, 2014	Edward Miller	 Is there any effect of the project on the connection to the Banning electric utility?
May 22, 2014	Robert Wyser	 Not able to attend meeting in Loma Linda Have 4 transmission towers on land, they will be replaced by 4 new towers Need clarification of terms in Agricultural resources: temporary, potential, and long-term impacts Interested in assessment and solutions to removal of orange trees and damage to other trees in making room for new towers Concerned with statement: "Project would potentially converted farmland to non-agricultural use" – will zoning be changed? Provide approximate schedule or time table for relocating towers
May 29, 2014	Bill Souder	 Comments also presented at Beaumont scoping meeting Currently towers are ~100 feet from property but new towers will be closer; there should be compensation to property owners; move towers on the north side of corridor away from houses Use pole-type towers instead of the truss style EMF needs to be evaluated SCE should revisit easement agreements and come to new agreement with property owners; should allow parks, RV storage, and other uses; provide latest copies of easement language SCE should be required to restore landscaping after construction If SCE is abandoning 100 feet of ROW on the north side, this area should be relinquished back to property owners Association has considered outdoor concert area, additional parking, replacing grass with plants, and game courts in the easement.
June 4, 2014	Steve Ferguson	 Concerned with replacement towers; new towers (D-V117 and DEC-10) will be more obtrusive Move towers away from homes and to the middle of the corridor or on the north side, please consider this to help homeowners
June 11, 2014	Vincent and Martha van Rooijen	 Live near segment 4, towers are already too close to our home they do not need to be moved closer Deny project, move project, or underground this nightmare they are dropping on our homes Negatively impacted because SCE wants to replace existing towers with taller towers and they want to install 50' from ROW where it is steep and close to our property Space is only buffer and they are taking that away Will suffer from unmitigated noise, severe visual impacts, slope destabilization, EMF, air quality, loss of buffer, fire threats, loss of wildlife and vegetation, loss of habitat, dust, access roads SCE is piecemealing, trying to escape cumulative and growth-inducing review under CEQA Look at the decision for El Casco, which removed a potential route near our house – found to be infeasible by CPUC

Date	From	Comments
		 New application for WOD is a mirror of former rejected, infeasible Northerly Route option; why wasn't the need for additional capacity brought up in the El Casco project; piecemealing the system Plans show 200' on north side of corridor; obvious that they will come in again for the 200 feet on northern hillside and further intensify the towers, where there is 1 there will be 4 Northerly Route (Option 3) was found to have more receptors (our homes) and would unavoidable noise, visual, air quality, biological resources, hazards and fire impacts (page ES-42) All of the issues identified in Table ES-2 of the El Casco ElR should be addressed Request that agencies meet with the Fairway Canyon HOA Make the project a topic of the monthly "Beaumont Cares" meeting sponsored by the City at city hall Letter provides suggestions for newspapers and websites to place project information Letter provides 18 issues that it believes need detailed studies including environmental impacts noted above, cumulative impacts, growth-inducing effects, alternatives, and effective mitigation Alternatives suggested: Move to El Casco route; route that merges with Morongo line but does not affect homes If can't find route that does not affect homes then it needs to go underground; CPUC needs to flexible on undergrounding Move towers 200' on north side hill where there are no homes If vacant property on north side gets develops, the developer can plan a better buffer from homes rather than having no options Make SCE accountable for not addressing this route in the El Casco application and review; if SCE knew they wanted both lines then deny this project and make them provide projects in full Need rules on piecemealing Letter includes photos of the towers location near Hagen Heights homes in Beaumont Find another route or underground
June 12, Hors 2014	st Schnur	 Opposed to project, it is too close to my house; should not be able to move them closer Move route, underground project, or move 200 feet on other side of hill near vacant land

Summary of Oral Comments Received at Scoping Meetings

Name & Organization	Comments
	2014 (6:00 pm to 8:00 pm) – Banning, CA
David Doherty	 Plan shows towers will move 35 feet south, which is right across from my back yard; footings have been marked and show that the tower (DEC106) will be right next to my house Why move closer to homes when there is vacant land behind me Submitted pictures of his property for consideration in the EIR/EIS
Edward Miller	 Banning has its own electric utility; will there be any change in the connection of these power lines to the utility?
Susan Savolainen	 Projected length of time from one segment to another? No mention of the Migratory Bird Treaty Act Are public routes of transit going to be identified?
Scoping Meeting, Mary 20,	2014 (6:00 pm to 8:00 pm) – Loma Linda, CA
Linda Rehm Corporate Business Center Property Manager	 Corporate Business Center consists of 31 office industrial buildings right off of Mountain View Avenue Want verification that we are in segment 2 of project, and if in this segment we would find out on the map where our location is in relation to the project Owner wants to know if the towers currently on his property will be replaced; what would the sizes be of the new towers?
Bill Olinger	 Live at base of Loma Linda hills; see towers from front yard Will towers be replaced with larger ones? Will visual impact be tremendous on the hills? Will there be lengthy road closures in residential areas or lots of construction noise?
Terrence Emershy	 Slide showed removal of 116 towers in San Timoteo Canyon and replace with 133 towers, where will towers go Family has property in San Timoteo Canyon in Segment 3
Scoping Meeting, May 21, 2	2014 (3:00 pm to 5:00 pm) – Beaumont, CA
Patrick Rafter	 Can this power line be placed underground? Has it been considered? Asking that undergrounding the line be considered, it is safer not only for public but for SCE too
Eric Johnson Wagner Wind Power (Palm Springs) and Baywa Energy Group	 Do not see any mitigation for existing energy producers that are going to suffer serious curtailments over the next 3 to 4 years Possibly an issue with PPAs also
Lanny Swerdlow	• Some of the transmission lines are on my property, what effect will it cause for me using the property after it is done?
Scoping Meeting, May 21, 2	2014 (7:00 pm to 9:00 pm) – Beaumont, CA
Tom Harris	 Have property in San Mateo Canyon, 10 acres, towers in rear portion SCE included mitigation measures in their application but mitigation measure have not yet beer proposed? I understand we will have an opportunity to review mitigation measures at some point. Aesthetics is very important, how much of a voice do I have on placement of the towers, currently there are 3 towers Want to explore possibility of shifting towers back in 400-foot ROW so they are less prominent to me What will be mitigated with regard to EMF, distance and placement from each other (towers) How will we be advised about the project from this point forward?

Name & Organization	Comments	
Thomas Covey	 I live near segment 6, MP 45, right at Devers Substation; I did not receive the notice Live very close to substation, have lived there for 30 years, my property is worthless, need to address as socioeconomic issue Address public health and safety along with EMF Have a recording studio/record label; substation not at full capacity, when at full capacity I will be out of business Concerned with cumulative impact of this stuff going in Concerned with safety of clients, have million-dollar rock stars coming to business, afraid somebody will get electrocuted Do you prefer comments in the mail or email? 	
Bill Souder	 Biggest concern is moving towers within 50 feet of residential property lines Corridor has lots of room to move towers to the center or to the north Pole-type towers are much nicer looking towers, don't know cost but these poles should be considered EMF is a concern; would like information on EMF mentioned earlier and on the project website People will be concerned with property values with the towers being moved closer to homes; move towers to the north side of ROW We have had run-ins with SCE regarding the use of the easement; easements should be updated because we would like to have flexibility on the use of the easement Will SCE replace landscaping that it removes? 	
Phyllis Lichtenstein	 How long will construction take in Segment 4? Months? Weeks? Years? During construction how will the project effect businesses and homes as far as electrical power ability and outages? Will construction be done at night? 	

Appendix D

Comment Letters

Comment Letters from Public Agencies

May 27, 2014

Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager) California Public Utilities Commission & Bureau of Land Management c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002

Notice of Preparation of a CEQA Document for the West Devers Upgrade Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: http://www.aqmd.gov/ceqa/handbook/signthres.pdf. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional

significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD CEQA Air Quality Handbook
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM intro.html
- CAPCOA's Quantifying Greenhouse Gas Mitigation Measures available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.
- SCAQMD's Rule 403 Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance
 Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be
 found at the following internet address: http://www.aqmd.gov/prdas/aqguide/aqguide/html.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (http://www.aqmd.gov).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at imacmillan@aqmd.gov or call me at (909) 396-3244.

Sincerely,

Ed Eckerle

Program Supervisor

Edward Echan

Planning, Rule Development & Area Sources

RVCSBC140516-07 Control Number

DEPARTMENT OF PUBLIC WORKS

FLOOD CONTROL • ENVIRONMENTAL & CONSTRUCTION • OPERATIONS SOLID WASTE MANAGEMENT • SURVEYOR • TRANSPORTATION

OUNTY SAN BERNARDINO

COUNTY OF SAN BERNARDINO

GERRY NEWCOMBE Director of Public Works

File: 10(ENV)-4.01

825 East Third Street • San Bernardino, CA 92415-0835 • (909) 387-8104 Fax (909) 387-8130

June 4, 2014

Billie Blanchard (CPUC Project Manager)
California Public Utilities Commission & Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA. 94104-3002

RE: CEQA - NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE WEST OF DEVERS UPGRADE PROJECT FOR THE PUBLIC UTILITIES COMMISSION

Mr. Blanchard:

Thank you for giving the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on May 15, 2014** and pursuant to our review, the following comments are provided:

Water Resources Division (Mary Lou Mermilliod, PWE III, 909-387-8222):

1. We have reviewed the Notice of Preparation and it appears that the Notice has identified Hydrology and Water Quality as subjects to be evaluated in the EIR. However, the District's recommendations are most often made for site-specific conditions. We would appreciate the opportunity to provide comments when more information becomes available.

Should you have any questions, please contact the individual who provided the specific comment, as listed above.

Sincerely,

SUNDARAMOORTHY SRIRAJAN, P.E.

Public Works Engineer III Environmental Management

 $SS:PE:nh/ceqaComments_PUC_NOP-West of Devers Upgrade Project States and the project State$

Board of Supervisors

ROBERT A. LOVINGOOD First District
JANICE RUTHERFORD Second District
JOSIE GONZALES

JAMES RAMOS . . GARY C. OVITT Fifth District

. Third District



June 11, 2014

Billie Blanchard (CPUC Project Manager)/Brian Paul (BLM Project Manager) California Public Utilities Commission & Bureau of Land Management c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002

Re: West of Devers Upgrade Project – Notice of Preparation

Dear Ms. Blanchard and Mr. Paul:

The City of Colton is pleased to participate in the scoping process for the West of Devers Upgrade Project by providing comments on the CPUC Notice of Preparation (NOP) for a Joint Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). City of Colton staff has reviewed the project description, accompanying exhibits, and Summary of Potential Issues and Impacts (NOP Attachment A), and has the following initial comments to assist in preparing the joint EIR/EIS, including appropriate mitigation measures:

Aesthetics/Visual

Although the project will use existing utility corridor within Segment 2 where above-ground transmission lines already exist, the taller, wider towers and larger conductor may significantly impact scenic vistas within the City of Colton. In addition, two additional towers (D-V6 and D-V12) are proposed within the City of Colton that will be highly visible from nearby residential areas and heavily traveled roadways, including Mount Vernon Avenue, Barton Road and I-215. We request that the environmental analysis include detailed visual simulations, with perspectives impacted travel corridors. Undergrounding the lines should be considered as mitigation for visual impacts.

Land Use

The project may impede residential development opportunities within the Reche Canyon area of Colton by creating a larger physical barrier and necessitating greater development setbacks. We request that the City of Colton's General

West of Devers Upgrade Project NOP June 11, 2014 Page 2

Plan, Zoning Code and Reche Canyon Specific Plan be reviewed relative to the impacts on planned and permitted development.

Public Health and Safety

The expanded utility corridor may increase the risk of fire in open undeveloped areas with limited accessibility. Health and safety impacts related to the risk of fire, both short term (i.e. construction activities) and long-term (i.e. risk of tower failure, snapped conduits, etc.) must be adequately considered in the EIR/EIS. Mitigation should include an emergency response plan with enhanced fire prevention, and consideration of undergrounding the lines to remove the risk of fire.

Transportation and Traffic

Construction activities will result in road closures and limited access for an extended period of time within the Cities of Colton and Grand Terrace. This "short-term" impact should be analyzed with regard to the limited road infrastructure that already exists within the project areas.

Recreation

Recreational activities in Colton and Grand Terrace could be affected by the increased size of the towers and close proximity to trails and off-road activities in the area. The increased size of the towers could also limit recreational connectivity opportunities between the cities. The potential loss of recreational areas should be addressed in the EIR/EIS.

Geology/Soils

Slope stability issues must be considered in the EIR/EIS. The area referred to as the Mount Vernon slope has experienced stability issues. Specifically, the area of concern is a property recently acquired by the City of Grand Terrace due to geological stability issues. This area is bordered directly between the Cities of Colton and Grand Terrace.

The project will traverse open, undeveloped and hillside areas. Potential erosion impacts stemming from the construction activities must be addressed in the EIR/EIS, with appropriate mitigation measures.

Air Quality

Short and long-term impacts to air quality, such as airborne dust and construction vehicle emissions, must be considered in the EIR/EIS. In particular, our area experiences high winds; therefore, mitigation measures must, at a minimum, include dust suppression measures.

Noise

Due to the proximity of the project area to residential areas, short and long-term noise impacts must be adequately evaluated and mitigated. In particular, short-term impacts from construction activities include construction vehicles and hours of construction. Long-term impacts would include any ongoing noise generated from conductors.

West of Devers Upgrade Project NOP June 11, 2014 Page 3

Thank you for the opportunity to participate in the scoping process for this project. We look forward to ongoing input and dialogue as planning and design proceeds for the West of Devers Upgrade Project. Should you have follow-up questions or require clarification of our comments, please contact me at 909-370-5185.

Respectfully,

MARK R. TOMICH

Development Services Director

C: Ken Henderson, City of Grand Terrace City Manager
T. Jarb Thaipejr, City of Loma Linda City Manager
Steve Ward, City of Colton Interim City Manager
David X. Kolk, Colton Electric Utility Director
Amer Jakher, Colton Public Works Director



City of Banning

99 E. Ramsey Street · P.O. Box 998 · Banning, CA 92220-0998 · (951) 922-3125 · Fax (951) 922-3128

COMMUNITY DEVELOPMENT DEPARTMENT

June 11, 2014

Via E-Mail

Billie Blanchard (CPUC Project Manager)/
Brian Paul (BLM Project Manager)
California Public Utilities Commission & Bureau of Land Management c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94101-3002

SUBJECT: NOTICE OF PREPARATION (NOP) FOR A JOINT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT FOR THE WEST OF DEVERS UPGRADE PROJECT

Dear Mr. Blanchard and Mr. Paul:

Thank for providing the City of Banning Community Development staff with a copy of the NOP and an opportunity to comment on the above-mentioned project.

The Project description and the maps that are attached to the NOP are very general. It is difficult to tell the limit of construction and the extent of the area that will be directly affected by the project. The NOP mentions the number of structures that would be affected within each segment; however, it is unclear as to their specific locations and the extent of the environmental impacts associated with the structures.

Please provide specific information with regard to the following within the City of Banning corporate boundary:

- 1. Structures to be removed and their locations.
- 2. Structures to be upgraded and their locations.
- 3. Structures that would be relocated and their locations.
- 4. Timeline for the start and completion of items 1 through 3 above.

The above information will assist the City staff in evaluating the West of Devers project impacts on the existing and future land uses within the City of Banning. As provided in the NOP, the impacts cannot be determined. Also, please confirm whether the transmission towers that are located within the East Pit of Robertsons' Mine will be relocated. These towers are located at the northeast corner of the City of Banning corporate boundary to the west of MP 30 as shown in Figure 1 in the NOP.

NOTICE OF PREPARATION (NOP) FOR A JOINT ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL IMPACT STATEMENT FOR THE WEST OF DEVERS UPGRADE PROJECT June 12, 2014 Page 2 of 2

If you have any questions regarding this letter, please contact me at (951) 922-3131 or send an e-mail to zabubakar@ci.banning.ca.us.

Sincerely,

Zai Abu Bakar

Community Development Director

cc: Homer Croy, Interim City Manager

June Overholt, Administrative Services Director/Deputy City Manager

Duane Burk, Public Works Director Fred Mason, Electric Utility Director



Community Development Department

DELIVERED BY ELECTRONIC MAIL

June 12, 2014

Billie Blanchard (CPUC Project Manager)/Brian Paul (BLM Project Manager)
California Public Utilities Commission & Bureau of Land Management
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Re: West of Devers Upgrade Project – Notice of Preparation

Dear Ms. Blanchard and Mr. Paul:

The City of Grand Terrace is pleased to participate in the scoping process for the West of Devers Upgrade Project by providing comments on the California Public Utilities Commission (CPUC) Notice of Preparation (NOP) for a Joint Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). In addition, we appreciate the meeting facilitated by the CPUC on May 21, 2014, with Ms. Blanchard and the Aspen Environmental Group Team.

While the City of Grand Terrace supports the use of renewable energy and improvements to the system that will provide the deliverability of greener energy, such improvements must be done in consideration of environmental impacts created by said improvements.

As such, we have reviewed the NOP and accompanying information and attachments, and have the following initial comments to assist in preparing the joint EIR/EIS:

Aesthetics/Visual

The Project proposes to use the existing utility corridor within Segment 2 where above ground transmission lines already exist to upgrade the system. However, the new towers will be taller and more massive to support the heavier conductors. In addition, two additional towers (D-V6 and D-V12) are proposed in proximity to Grand Terrace, within neighboring City of Colton, that are highly visible from two heavily traveled roadways: Mount Vernon Avenue and Barton Road. Many of the towers within Segment 1 are in proximity to existing commercial and residential areas making them more visible. Therefore, thorough analysis, including visual simulations, of

Response to Notice of Preparation West of Devers Upgrade Project Page 2 of 3

aesthetic/visual impacts must be included in the EIR/EIS, and undergrounding as mitigation should not be discounted.

Noise

Due to the proximity of the Project area to residential and commercial areas short and long term noise impacts must be adequately evaluated and mitigated. In particular, short term impacts from construction activities include construction vehicles both air and ground, hours of construction, and long term impacts would include any ongoing noise generated from conductors. It should be noted that the City of Grand Terrace is not inclined to approve construction activities between the hours of 7:00 p.m. and 7:00 a.m.

Transportation/Traffic

Construction activities will result in road closures and limited access for extended period of times. These closures will impact highly traveled roadways and/or commercial centers in the Cities of Grand Terrace and Colton. These impacts must evaluated in the EIR/EIS and property mitigated.

Biological Resources

The California gnatcatcher and its habitat are located within Segment 2. Potential impacts to this sensitive resource must be analyzed the EIR/EIS, and adequately mitigated.

Geology/Soils

Slope stability issues must be considered in the EIR/EIS. The area referred to as the Mount Vernon slope has experienced stability issues. The City acquired a property that backs onto Mount Vernon Avenue due to geological stability issues, and recently a house deck collapsed. This area is bordered directly between the Cities of Grand Terrace and Colton

The Project will traverse open, undeveloped and hillside areas. Potential erosion impacts stemming from construction activities must be addressed in the EIR/EIS, and appropriate mitigation measures set forth.

Air Quality

Short and long-term impacts to Air Quality, such as airborne dust and construction vehicle emissions, must be considered in the EIR/EIS. In particular, our area experiences high winds; therefore, mitigation measures must, at a minimum, include dust suppression measures.

Response to Notice of Preparation West of Devers Upgrade Project Page 3 of 3

Public health and safety

The expanded utility corridor may increase the risk of fire in open undeveloped areas with limited accessibility. Health and safety impacts related to risk of fire, both short term (i.e. construction activities) and long-term (i.e. risk of tower failure, snapped conduits, etc.) must be adequately considered in the EIR/EIS. Mitigation should include an emergency response plan with enhanced fire prevention, and consideration of undergrounding to remove risk of fire.

Recreation

Recreational activities in Grand Terrace and Colton could be affected by the increased size of the towers and close proximity to trails and off-road activities in the area. The increased size of the towers could also limit recreational connectivity opportunities between the Cities. The potential loss of recreational opportunities must be addressed in the EIR/EIS.

Thank you for the opportunity to participate in the scoping process for this project. We look forward to ongoing input and dialogue as planning and design proceeds for the West of Devers Upgrade Project. Should follow up questions or clarification be required, please feel free to contact me at 909-430-2225.

Sincerely,

SANDRA MOLINA

Community Development Director

Ken Henderson, City Manager
 Steve Ward, City of Colton Interim City Manager
 Mark Tomich, City of Colton Development Services Director
 David X. Kolk, Colton Electric Utility Director

DEPARTMENT OF WATER RESOURCES1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791

June 5, 2014



Mr. Billie Blanchard California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94104

Notice of Preparation for Environmental Impact Report, West Devers Transmission Upgrade Project, California Aqueduct, Santa Ana Pipeline, Approximate Milepost 424.94, Southern Field Division, SCH2014051041

Dear Mr. Blanchard:

Thank you for the opportunity to review and comment on the Notice of Preparation for West Devers Upgrade Project Draft Environmental Impact Report, as requested by California Public Utilities Commission. The notice by the applicant is to solicit information and agency input related to approximately 10 miles (Segment 2) of high voltage transmission lines, situated within San Bernardino County. The Applicant's improvements include: replacement of one 220 kV line, removal of 29 existing towers, and installation of 35 new towers within their existing right of way (ROW). The primary purpose for the upgrades are to provide a reliable power transmission system from Vista Substation to Devers Substation, associated with which supports large generator agreements and solar projects.

The proposed improvements could impact lands in close proximity to the California Aqueduct Santa Ana Pipeline, part of the Department of Water Resources' (DWR) ROW. The proposed project will cross DWR's ROW near Barton Road along West Devers at Milepost 1located within the Community of Grand Terrace. Any improvements that encroach upon or impact DWR's ROW will require review and possible permitting from DWR prior to the start of any construction.

Please provide DWR with a copy of any subsequent environmental documentation when it becomes available for public review. Any future correspondence relating to this project should be sent to:

Leroy Ellinghouse, Chief SWP Encroachments Section Division of Operations and Maintenance Department of Water Resources 1416 Ninth Street, Room 641-2 Sacramento, California 95814 Mr. Billie Blanchard June 5, 2014 Page three

In addition, please continue to keep DWR informed of any future actions with respect to the West Devers Upgrade Project.

If you have any questions, please contact Leroy Ellinghouse, Chief of DWR's SWP Encroachments Section, at (916) 653-7168 or Mike Anderson at (916) 653-6664.

Sincerely,

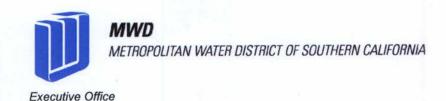
David M. Samson, Chief

State Water Project Operations Support Office

Division of Operations and Maintenance

cc: State Clearinghouse

Office of Planning and Research 1400 Tenth Street, Room 121 Sacramento, California 95814



June 11, 2014

Via Federal Express

Ms. Billie Blanchard 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002

Dear Ms. Blanchard:

Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project Proposed in Riverside and San Bernardino Counties

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Preparation (NOP) for the joint Environmental Impact Report/Environmental Impact Statement (Joint EIR/EIS) for the West of Devers Upgrade Project proposed by Southern California Edison. The proposed project consists of the removal and upgrade of existing 220 kV transmission lines in six segments, substation equipment upgrades at five substations, subtransmission line upgrades at two substations, electric distribution line upgrades, and the installation of telecommunication lines. The project extends over 45 miles from the Vista Substation in the community of Grand Terrace to the Devers Substation near Palm Springs. The project traverses the communities of Grand Terrace, Colton, Loma Linda, Redlands, Calimesa, Beaumont, Banning, Morongo Tribal Lands, and Palm Springs in Riverside and San Bernardino Counties.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving more than 19 million people in six counties in Southern California. One of Metropolitan's major water supplies is the Colorado River conveyed via Metropolitan's Colorado River Aqueduct (CRA). The CRA consists of tunnels, open canals and buried pipelines. CRA-related facilities also include above and below ground reservoirs and aquifers, access and patrol roads, communication facilities, and residential housing sites. The CRA, which can deliver over 1.2 million acre-feet of water annually to the southern California coastal plain, extends 242 miles from the Colorado River to Lake Mathews. Metropolitan has five pumping plants located along the CRA, which consume approximately 2,400 gigawatt-hours of energy when the CRA is operating at full capacity.

In the project area, the CRA is a 16-foot cut and cover conduit. The CRA extends in a general east-west direction and is bisected by the proposed project near MP 38 and MP 42 (see attached

Ms. Blanchard Page 2 June 11, 2014

map). Metropolitan also has fee property of varying widths through the same area. Based on a review of the proposed project boundaries as described in the NOP, the project has the potential to impact Metropolitan's CRA. In particular, the proposed project could interfere with Metropolitan's ongoing operation, maintenance and repair activities on the CRA, which require unrestricted and unobstructed access to these facilities. Accordingly, the Joint EIR/EIS must examine the potential impacts to Metropolitan's facilities and ensure that any such impacts are fully mitigated.

In order to avoid potential conflicts with Metropolitan's facilities and rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Loading restrictions will be necessary in areas that cross the CRA. Approval of the project is contingent on Metropolitan's approval of design plans for portions of the proposed project that could impact its facilities. Any future design plans associated with this project should be submitted to the attention of Metropolitan's Substructures Team.

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation on this project. For further assistance, please contact Ms. Michelle Morrison at (213) 217-7906.

Very truly yours, Fohn Shamma

Deirdre West

Manager, Environmental Planning Team

MM

J:\Environmental Planning&Compliance\Completed Jobs\June 2014\Job No. 2014051604\WestOfDevers.docx

Enclosures: Planning Guidelines and Map of Metropolitan Facilities in Project Vicinity MWD-Colorado River Aqueduct Map

Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California

1. Introduction

- a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.
- b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

- a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.
- b. Netropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.
- c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.
- d. Netropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Netropolitan's Rights-of-Way

- a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.
- b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.
- c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear sone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.
- d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

- a. We encourage the use of Metropolitan's fee rightsof-way by governmental agencies for public street and
 utility purposes, provided that such use does not interfere
 with Metropolitan's use of the property, the entire width of
 the property is accepted into the agency's public street
 system and fair market value is paid for such use of the
 right-of-way.
- b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

- a. A green belt may be allowed within Metropolitan's fee property or easement.
- b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

- c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.
- d. Deep-rooted trees are prohibited within
 Metropolitan's fee properties and/or easements. Shallowrooted trees are the only trees allowed. The shallow-rooted
 trees will not be permitted any closer than 15 feet from the
 centerline of the pipeline, and such trees shall not be
 taller than 25 feet with a root spread no greater than
 20 feet in diameter at maturity. Shrubs, bushes, vines, and
 ground cover are permitted, but larger shrubs and bushes
 should not be planted directly over our pipeline. Turf is
 acceptable. We require submittal of landscape plans for
 Metropolitan's prior review and written approval. (See
 Figure 3).
- e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.
- f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or wasements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

- a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.
- b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.
- c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.
- d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alinement as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.
- e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.
- f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

- g. Overhead electrical and telephone line requirements:
 - 1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Matropolitan. Under no circumstances shall clearance be less than 35 feet.
 - 2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.
 - 3) Line clearance over Matropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.
 - 4) When underground electrical conduits,
 120 volts or greater, are installed within
 Metropolitan's fee property and/or easement, the
 conduits must be incased in a minimum of three inches
 of red concrete. Where possible, above ground warning
 signs must also be placed at the right-of-way lines
 where the conduits enter and exit the right-of-way.
- h. The construction of severlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of- way.
- i. Cross sections shall be provided for all pipeline crossings showing Matropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

- j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assists others in locating and identifying its pipeline. Two-working days notice is requested.
- k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.
- 1. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:
 - Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

with:		Bill ordered in the line
	"CAUTION BURIED	PIPELINE*
3) two-inch	Sewer or storm draigreen warning tape s	n pipeline: A hall be imprinted with:
	"CAUTION BURIED	PIPELINE"
signals o	Electric, street li conduit: A two-inch nted with:	ghting, or traffic red warning tape shall
	*CAUTION BURIED	CONDUIT
5) two-inch with:	Telephone, or televorange warning tape	ision conduit: A shall be imprinted
	"CAUTION BURIED	CONDUIT

m. Cathodic Protection requirements:

- 1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.
- 2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.
- 3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.
 - 4) If a steel carrier pipe (casing) is used:
 - (a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).
 - (b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.
- n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of Metropolitan to use its fee properties and/or easements for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from the fee properties and/or easements, such removal and replacement shall be at the expense of the owner of the facility.

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainage

- a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.
- b. If water <u>must</u> be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. of Metropolitan's Operations Services Branch, telephone (213) 250- , at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must restricted to that which

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

- a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:
- b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.
- c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

- 2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:
- a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.
 - b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.
 - c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.
 - d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. When Environmental Documents Have Been Prepared

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

- The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.
- 2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. Metropolitan's Plan-Review Cost

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

- b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.
- c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Caution

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

17. Additional Information

Should you require additional information, please contact:

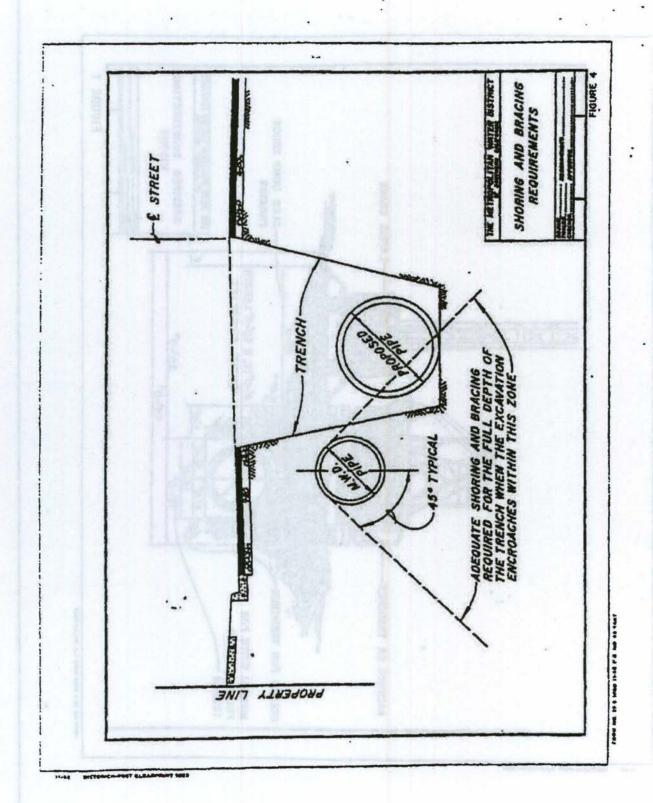
Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

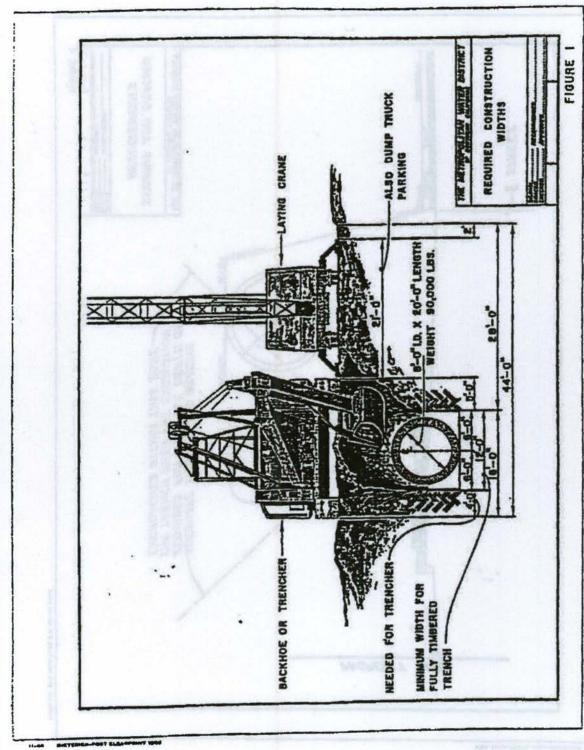
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Rev. January 22, 1989

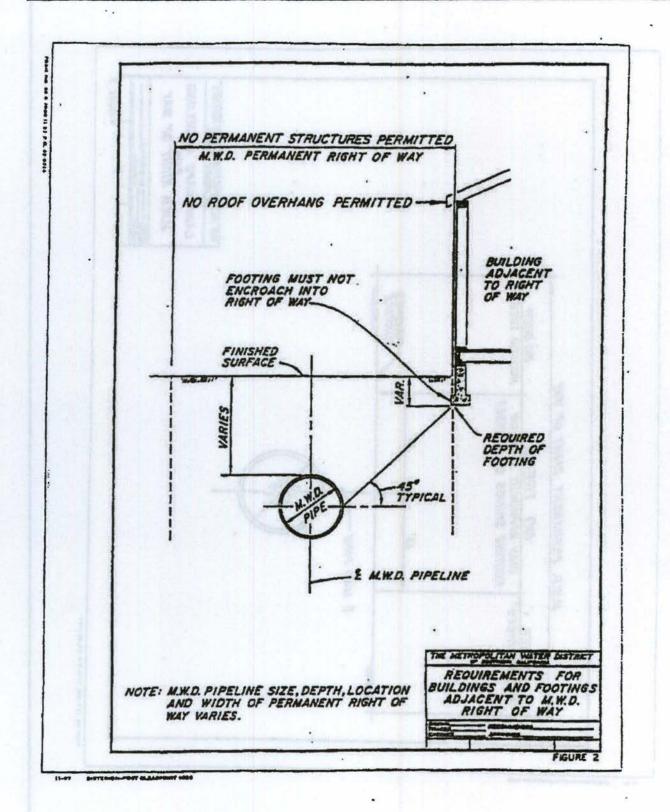
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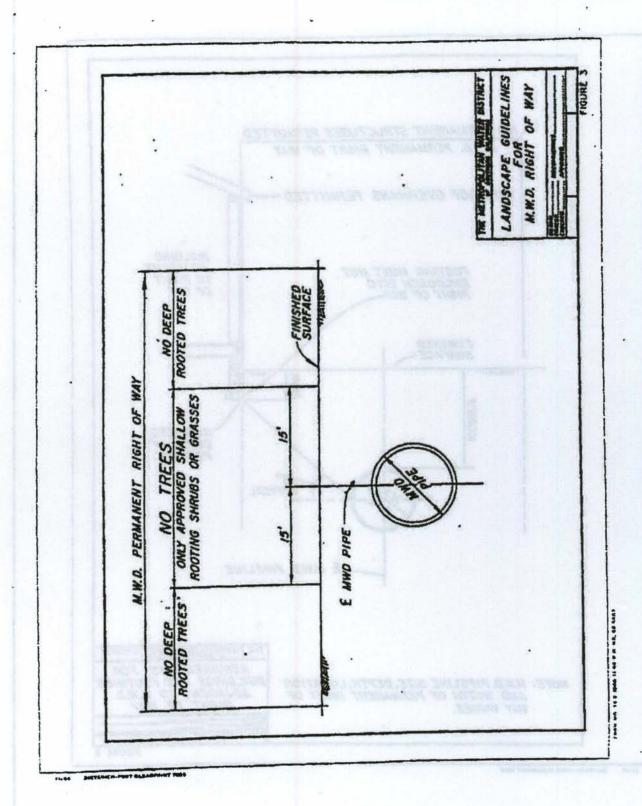
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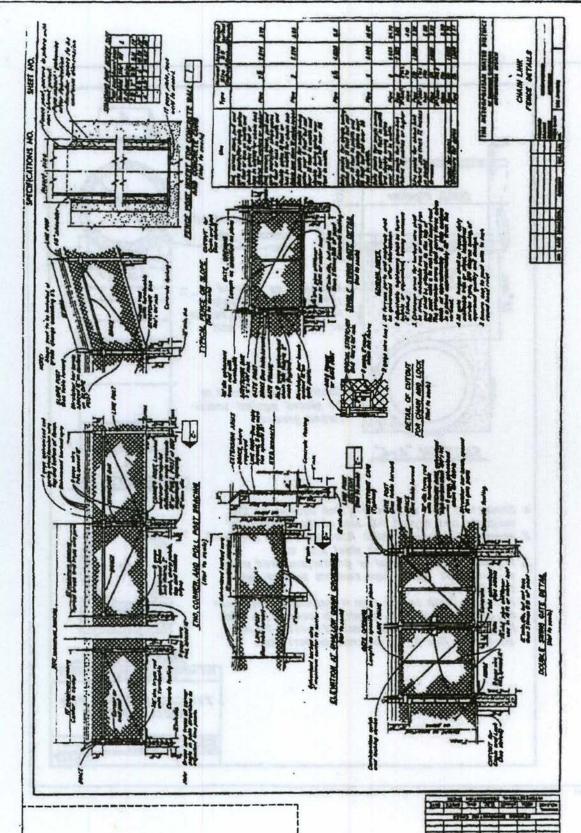


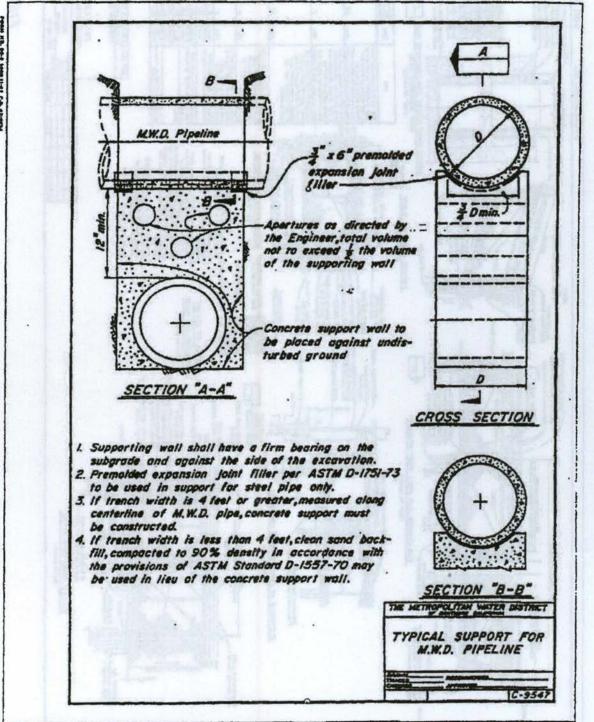


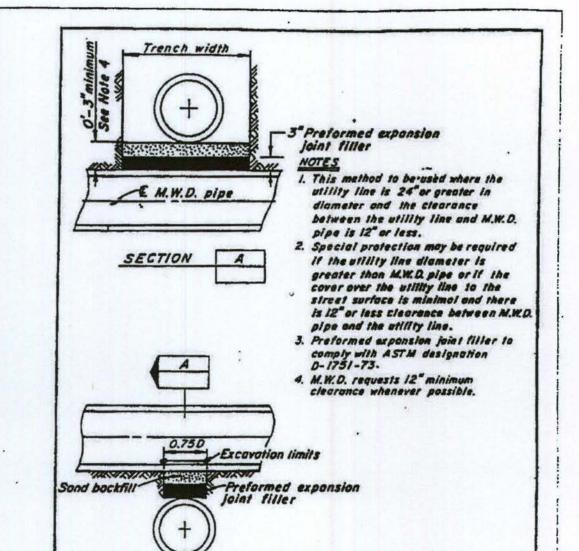
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THE METHOPOLITUM WATER DISTRICT
TYPICAL EXPANSION JOINT
FILLER PROTECTION FOR
OVERCROSSING OF
M.W.D. PIPELINE

G-11632

CROSS SECTION



State of California - Natural Resources Agency DEPARTMENT OF FISH AND WILDLIFE Inland Deserts Region 3602 Inland Empire Blvd., Suite C-220 Ontario, CA 91764 (909) 484-0459 www.wildlife.ca.gov

June 12, 2014

Billie Blanchard California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94104

Subject:

Notice of Preparation for the West Devers Upgrade Project

Draft Environmental Impact Report State Clearinghouse No. 2014051041

Dear Ms. Blanchard:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the West Devers Upgrade Project (Project) [State Clearinghouse No. 2014051041]. The Department is responding to the NOP as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 et seq.) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

Project Description

The Project is located within the existing West Devers transmission corridor in Riverside and San Bernardino Counties, including Tribal Lands of the Morongo Band of Indians and the Cities of Banning, Beaumont, Calimesa, Colton, Grand Terrace, Loma Linda, and Redlands. The proposed Project will include the removal and upgrade of existing 220 kV transmission lines in six different segments. The segments were determined by location. The Project segments are described as follows:

Segment 1: San Bernardino. Two existing 220 kV double-circuit lines including 45 double-circuit towers will be removed and 61 towers will be installed within the existing right-of-way (ROW).

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Segment 2: Colton and Loma Linda. One existing 220 kV line will be removed and rebuilt, involving the removal of 29 double-circuit towers and the installation of 353 towers.

Segment 3: San Timoteo Canyon: Removal of three existing sets of 220 kV towers and construction of two sets of towers, requiring the removal of 116 individual towers and installation of 133 towers.

Segment 4: Beaumont and Banning. Removal of approximately 175 structures and the installation of approximately 136 towers.

Segment 5: Morongo Tribal Lands and Vicinity. Six miles of this 9.5-miles segment are on Morongo Tribal Lands. In this segment, approximately 137 structures will be removed and approximately 108 structures will be installed. Three miles of the existing ROW on Morongo Tribal Lands will be abandoned and relocated to the south, near the I-15 Freeway.

Segment 6: Whitewater Devers Substation. Removal of approximately 116 structures, installation of 93 towers.

Substation Upgrades: The Project will also involve substation equipment upgrades at Devers, El Casco, Etiwanda, San Bernardino, and Vista Substations to accommodate increased power transfers on 220 kV lines.

Biological Resources and Impacts

The CEQA document should contain sufficient, specific, and current biological information on the existing habitat and species at the Project site; measures to minimize and avoid sensitive biological resources; and mitigation measures to offset the loss of native flora and fauna and State waters. The CEQA document should not defer impact analysis and mitigation measures to future regulatory discretionary actions, such as a Lake or Streambed Alteration Agreement.

If state or federal endangered or threatened species have the potential to occur on the Project site, species specific surveys should be conducted using methods approved by the Department or assume the presence of the species throughout the project site. The CEQA document should include recent survey data (CEQA Guidelines Section 15125(a)). The CEQA document should also address species of special concern and federal critical habitat. To assist with review, an accompanying map showing the areas of impact should be included in the subsequent CEQA document. Additional maps detailing the location of endangered, threatened, or species of special concern should also be included in the subsequent CEQA document.

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Natural Community Conservation Program (NCCP) and California Endangered Species Act (CESA)

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the CESA, and administers the Natural Community Conservation Plan Program (NCCP Program). Within the Inland Deserts Region, the Department issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County Multiple Species Habitat Conservation Plan (WR MSHCP) and the Coachella Valley Multiple Species Habitat Conservation Plan/Natural Community Conservation Plan (CV MSHCP) per Section 2800, et seq., of the California Fish and Game Code. The WR MSHCP and CV MSHCP establish multiple species conservation programs to minimize and mitigate habitat loss and provide for the incidental take of covered species in association with activities covered under the permits.

Compliance with approved habitat plans, such as the MSHCPs, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCPs as a result of this Project is necessary to address CEQA requirements. To obtain additional information regarding the WR MSHCP please visit: http://rctlma.org/epd/WR-MSHCP and for the CV MSHCP please visit: http://www.cvmshcp.org.

The proposed Project occurs within the WR MSHCP and CV MSHCP areas and is subject to the provisions and policies of the MSHCPs. In order to be considered a covered activity, Permittees must demonstrate that proposed actions are consistent with the MSHCPs and their associated Implementing Agreements. The California Public Utilities Commission is the lead agency but is not signatory to either the WR MSHCP or the CV MSHCP, therefore, in order to participate in either MSHCP they would need to act as a Participating Special Entity (PSE).

If the California Public Utilities Commission (i.e., the Lead Agency) chooses to act as a PSE and obtain take through the WR MSHCP then the following MSHCP policies and procedures will apply to this project: Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP Section 6.1.2), Protection of the Narrow Endemic Plant Species (WR MSHCP Section 6.1.3), Additional Survey Needs and procedures (WR MSHCP section 6.3.2), and Urban/Wildland Interface Guidelines (WR MSHCP section 6.1.4).

If the California Public Utilities Commission chooses to act as a PSE and obtain take through the CV MSHCP then the project activities must comply with all of the terms and requirements of the Permit and Implementing Agreement. A PSE must submit a complete application for the proposed activity to the Coachella Valley Conservation Commission containing a detailed description of the proposed activity, a map indicating

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the location of the proposed activity, and an analysis of its potential impacts to Covered Species and their Habitats and to the MSHCPs Reserve System. In addition, to minimize the impacts of development in the Conservation Areas and adjacent to the Reserve System the following measures will apply to the project: Required Avoidance, Minimization, and Mitigation Measures (CV MSCHP Section 4.4) and Land Use Adjacency Guidelines (CV MSHCP Section 4.5)

If the Project is not processed through the MSHCPs for covered species, then the Project may be subject to the Federal Endangered Species Act (FESA) and/or CESA for threatened, endangered, and/or candidate species. The Department recommends that a CESA Incidental Take Permit (ITP) be obtained if the project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of species of plants or animals listed under CESA, either during construction or over the life of the Project. The Department's CESA ITP states that a project fully minimize and mitigate impacts to State-listed resources.

Lake and Streambed Alteration Program

The Department has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to http://www.dfg.ca.gov/habcon/1600/forms.html.

Although the portions of the proposed Project are within MSHCP boundaries, a Notification of Lake or Streambed Alteration may be required by the Department, should the site contain jurisdictional areas, and the Project proposes impacts to these areas. Additionally, the Department's criteria for determining the presence of jurisdictional waters are more comprehensive than the WR MSHCP criteria in Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools).

The following information will be required for the processing of a Notification of Lake or Streambed Alteration and the Department recommends incorporating this information Notice of Preparation West Devers Upgrade Project SCH No. 2014051041 Page 5 of 7

into the CEQA document to avoid subsequent documentation and project delays. Please note that failure to include this analysis in the project's environmental document could preclude the Department from relying on the Lead Agency's analysis to issue an LSA Agreement without the Department first conducting its own, separate Lead Agency subsequent or supplemental analysis for the project:

- Delineation of lakes, streams, and associated habitat that will be temporarily and/or permanently impacted by the proposed project (include an estimate of impact to each habitat type);
- Discussion of avoidance and minimization measures to reduce project impacts; and,
- Discussion of potential mitigation measures required to reduce the project impacts to a level of insignificance. Please refer to section 15370 of the CEQA Guidelines for the definition of mitigation.

Cumulative Impacts

The Project extends through populated areas of southern California. The regional scarcity of biological resources may increase the cumulative significance of Project activities. Cumulative effects analysis should be developed as described under CEQA Guidelines Section 15130. Please include all potential direct and indirect project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis.

Alternatives Analysis

The CEQA document should analyze a range of fully considered and evaluated alternatives to the Project (CEQA Guidelines Section 15126.6). The analysis should include a range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources. The Department considers Rare Natural Communities as threatened habitats, having both local and regional significance. Thus, these communities should be fully avoided and otherwise protected from Project-related impacts. The CEQA document should include an evaluation of specific alternative locations with lower resource sensitivity where appropriate. Off-site compensation for unavoidable impacts through acquisition and protection of high-quality habitat should be addressed.

Please note that the Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.

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Department Recommendations

evaluating impacts.pdf

The Department has the following concerns about the Project, and requests that these concerns be addressed in the CEQA document:

- The CEQA document should quantify impacts to habitats and species as per the informational requirements of CEQA. An accompanying map showing the areas of impact should also be included.
- The CEQA document should include recent biological surveys for fauna and flora (CEQA Guidelines Section 15125(a)). The Department recommends that the Lead Agency contact the Department's California Natural Diversity Database (CNDDB) in Sacramento, (916) 327-5960, to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the California Fish and Game Code. If state or federal threatened or endangered species may occur within the project area. species specific surveys, conducted at the appropriate time of year and time of day, should be included with the CEQA document. Acceptable species specific surveys have been developed by the Department, and by the U.S. Fish and Wildlife Service, and are accessible through each agencies websites. Assessments for rare plants and rare plant natural communities should follow the Department's 2009 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. If the Department's 2009 guidelines were not used, surveys conducted after the issuance of the 2009 guidance should be updated following the 2009 guidelines. The guidance document is available here:http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/protocols for surveying and
- 3. The CEQA document should provide an analysis of habitat conservation plans and natural community conservation plans, including the WR MSHCP and the CV MSHCP. The CEQA document should include a discussion of how the project will affect reserve assembly; how the Project will affect the goals and objectives of each NCCP; the applicable policies and procedures that pertain to the Project; a discussion of survey requirements; and a list of proposed mitigation measures pursuant to each NCCP. A copy of any documents discussing the Project's consistency with the NCCP (e.g., Determination of Biologically Equivalent or Superior Preservation for the WR MSHCP) should be included with the CEQA document.
- The analysis in the CEQA document should satisfy the requirements of the Department's Lake and Streambed Alteration Program and CESA (if deemed necessary).

Notice of Preparation West Devers Upgrade Project SCH No. 2014051041 Page 7 of 7

- 5. The Department recommends that a CESA ITP be obtained if the Project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the Project, and the applicant chooses not to process the Project through an NCCP. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats. The Department encourages early consultation, as significant modification to the proposed project and mitigation measures may be recommended in order to obtain a CESA ITP. Revisions to the California Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA ITP unless the Project CEQA document addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit.
- The CEQA document should provide a thorough analysis of direct, indirect, and cumulative impacts and identify specific measures to offset such impacts.
- The CEQA document should analyze a range of fully considered and evaluated alternatives to the Project (CEQA Guidelines Section 15126.6).

In summary, the Department requests that the CEQA document include current information regarding biological resources, adequately address whether the project will be processed thorough the MSHCPs, provide a thorough analysis of cumulative impacts, and provide an alternatives analysis. If you should have any questions pertaining to these comments, please contact Heather Weiche at Heather.weiche@wildlife.ca.gov and 909-980-8607.

Sincerely,

Ali Aghili

Senior Environmental Scientist (Supervisor)

cc: State Clearinghouse

CHRON

Appendix D-2

Comment Letters from Organizations and Companies

Email: West of Devers Upgrade Project EIR/EIS Team

From: Randy <randy@cramember.com>
Sent: Monday, May 12, 2014 4:32 PM

To: West Of Devers Project

Subject: West of Devers Upgrade Project

Dear sirs

Cherry Valley Lakes Resort located at 36805 Brookside Ave. Beaumont Ca. 92236 is a camping resort located within the project.

We have no objection to the new proposed project as long as it does not adversely affect our current RV storage location. We have stored RV's in this location for over 10 years and it is an integral part of our business.

Randy Wright



Anthony A. Klecha Principal Environmental Specialist

Southern California Gas Company
Sempra Energy utilities
GT17E2
555 Fifth Street
Los Angeles, Ca. 90013
Tel: (213) 244-4339
Fax: (323) 518-2324

June 4, 2014 Sent via Email

Billy Blanchard CPUC Project Manager c/o: Aspen Environmental Group 235 Montgomery Street # 935 San Francisco, CA 94104-3003

Re: Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project, Riverside and San Bernardino Counties

Dear Mr. Blanchard:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and comment on the subject Notice of Preparation (NOP) for a Joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the West of Devers Upgrade Project. SoCalGas understands that Southern California Edison (SCE) proposes to remove and upgrade transmission lines; upgrade substations, substation equipment, and electric distribution lines; and install telecommunication lines in Riverside and San Bernardino counties.

The West of Devers Project alignment crosses over two dozen SoCalGas distribution pipelines and at least three natural gas transmission pipelines. SoCalGas Transmission Lines identified within the West of Devers Project alignment and associated substations include: 1) SoCalGas Pipeline #6909, a 24-inch natural gas transmission pipeline that runs along East San Bernardino Avenue and ties into the west side of SCE's San Bernardino Substation; 2) SoCalGas Pipeline #2001, a 30-inch natural gas transmission pipeline that transverses Segment 5 of the West Devers Project, east of Hathaway Avenue within the City of Banning and the Morongo Reservation in Riverside County; and 3) SoCalGas Pipeline #6916, a 16-inch natural gas transmission pipeline that crosses Segment 6 of the West of Devers Project, approximately 2.6 miles west of Devers Substation.

SoCalGas respectfully requests that the following comments be incorporated into the Draft EIR/EIS:

 SoCalGas recommends that the project proponent call Underground Service Alert at 811 at least two business days prior to performing any excavation work. Underground Service Alert will coordinate with SoCalGas and other utility owners in the area to mark the locations of buried utility-owned lines. • Should it be determined that the proposed project may require SoCalGas to abandon and/or relocate any portion of its existing natural gas lines in the project area, the potential impacts associated with this work should be appropriately considered and addressed under the Draft EIR/EIS.

Once again, we appreciate the opportunity to comment on the NOP. If you have any questions, please feel free to contact me at (213) 244-4339 or aklecha@semprautilities.com.

Sincerely,

Anthony A. Klecha

Principal Environmental Specialist Southern California Gas Company

cc: Rosalyn Squires (SoCalGas) Shelly Long (SoCalGas) Whitewater Development Corporation Energy Development & Construction Corporation Whitewater Energy Corporation Wind Energy Partnership, a CA L.P. Whitewater Maintenance Corporation

c/o San Gorgonio Farms, Inc. 707 Esplanade Suite #C Redondo Beach, CA 90277-4634

TO: Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager) California Public Utilities Commission & U.S. Bureau of Land Management c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002 Fax and Voicemail: (888) 456-0254

Email: westofdevers@aspeneg.com

June 9, 2014

RE: Southern California Edison's West of Devers Upgrade Project (Application A.13-10-020, filed October 25, 2013)

On behalf of the listed companies atop of this letter, in reviewing the Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project Proposed by Southern California Edison ("SCE") Application No. A.13-10-020, we find that the notice fails to address severe impacts that need to be addressed and also included in the mitigation portion of the EIR.

The effect of curtailing existing power plants, specifically renewable energy projects in the immediate area for a period of years, without reimbursement is a significant impact that needs to be mitigated. This subject needs to be addressed in, we feel, one or all of the EIR topics listed below.

- LAND USE
- SOCIOECONOMICS
- PUBLIC HEALTH AND SAFETY
- PUBLIC SERVICES AND UTILITIES

SCE proposes to allow companies that currently do not reside on the power grid (new generators), to have the capacity to sell their power to the market. Because the lines are now full or overloaded, SCE wants to take existing power lines out of service to upgrade them and curtail existing suppliers. These curtailments will cost existing power plants millions of dollars collectively to provide a benefit to someone else (the new generators).



SCE proposes, without mitigation or reimbursement to existing generators, to stop payments for (and not limited to):

- lost energy
- capacity
- ancillary services
- tax benefits
- other related revenue streams to existing generators.

SCE simply wants to send the generators a curtailment notice to stop generating or reduce generation.

These generators may have:

- debt obligations
- power purchase agreements with minimum delivery requirements
- certain onerous financing structures in place requiring minimum production
- operators who are barely maintaining profitability due to low power prices
- generation entities who have shareholder obligations to maximize profits

These generators are harmed by being asked to curtail or shutdown for the benefit of others.

There is also a negative trickle down effect of being asked to curtail and that results in lower revenues for associated parties. Examples such as maintenance companies relying on generation based payment structures; lower land rent payments to land owners that have turbines located on their property; reduced payments for management and accounting services for those production based structures are a few affected parties.

SCE should be required to compensate affected generators for their lost production. Existing generators do not benefit from the addition of more capacity. Edison and the rate payers benefit from the additional capacity and therefore should reimburse the affected generators for this benefit.

In light of the 2011 CPUC approved risk sharing structures of new power purchase agreements, PG&E has a provision allowing 5% of expected annual generation to be curtailed for <u>economic</u> reasons with generators receiving <u>their full contract price for all curtailed energy</u> (excluding PTC). SCE has a curtailment cap between 50 and 200 hours per year, with compensation and a discounted buyback option for any excess curtailment. The commission already sees a huge issue regarding unpaid curtailment. These above solutions are simply to address <u>economic curtailments</u>.

When we discuss curtailment for the benefit of other projects, FERC states that curtailment cannot be unduly discriminatory or preferential. SCE appears to be allowing their owned generation assets and out of State generation to operate while curtailing the renewable generators located in California. Shutting down generators without compensation in preference to other generators is discriminatory. The West of Devers upgrades are not for system reliability or for maintenance purposes; the upgrades are to allow new generators to interconnect to the system, again curtailment to benefit other generators.



Each West of Devers line is going to be increased by approximately 400% in carrying capacity. Therefore, one completed line could handle the load of all four (4) existing West of Devers lines. SCE should be required to plan construction activities around bringing one line online as soon as possible to be able to carry the load of all of the West of Devers lines. This would significantly reduce or mitigate months or years of curtailments. If the generators are made "whole" and reimbursed for their lost revenues and tax benefits outlined above, this mitigation would still be appropriate to mitigate rate-payer costs (those revenues paid to generators to curtail so they are not harmed).

Renewable generation has a special problem. Once the prime mover is lost (wind, sun, steam, heat) it can never be recovered. Once the wind passes, the sun rays pass by unused, steam is released to avoid excessive pressure; there is no way to store or use that energy source later. Fossil fuel generators however, have the ability to store their fuel source to use later, or in some cases are even paid to 'stand-by'. Renewable generation is again unfairly damaged compared to other generators when asked to curtail for the benefit of others.

Turning off and on high voltage substations ranging from 12 kV to 115 kV adds a level of risk and safety concern every time we are asked to open and close equipment; not to mention increased labor costs to handle those requests. Shutting down or curtailing older wind generation units too, carry a hazard especially in high winds. Wind turbines and I am sure other generation types are designed to run and stop only in an emergency.

For the reasons above, we request the commission direct SCE to mitigate damages to renewable generators. Generators must be made "whole" with payments made to those companies during times of curtailment or SCE created congestion.

And finally, SCE's construction schedule should place an extremely high priority on the least amount of curtailment (limited to low renewable generation times of the year (Oct-Feb)) of existing generation and actively devise plans to build the lines in such a way as to achieve little to no curtailment for the benefit of the rate payers and the current power suppliers.

Sincerely,

Bradford W. Adams *Vice President*

San Gorgonio Farms, Inc.

PAINTED HILLS WIND DEVELOPERS 638 LINDERO CANYON ROAD, #273 OAK PARK, CALIFORNIA 91377 PHONE 303 641-3841 FAX 818 991-2232 EMAIL bphalloran@yahoo.com

June 12, 2014

From: Painted Hills Wind Developers, a California Joint Venture Owner and operator of a 19.25 MW wind project

TO: Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager) California Public Utilities Commission & U.S. Bureau of Land Management c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002 Fax and Voicemail: (888) 456-0254 Email: westofdevers@aspeneg.com

RE: Southern California Edison's West of Devers Upgrade Project (Application A.13-10-020, filed October 25, 2013)

On behalf Painted Hills Wind Developers, a California joint venture that owns and operates a 19.25 MW wind project which is in Riverside County California and in the vicinity of the Devers substation and that interconnects with Devers as well. We have reviewed the Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project Proposed by Southern California Edison ("SCE") Application No. A.13-10-020, and unfortunately we find that the notice fails to address severe impacts that need to be addressed and also included in the mitigation portion of the EIR.

The effect of curtailing existing power plants, specifically renewable energy projects in the immediate area for a period of years, without reimbursement is a significant impact that needs to be mitigated. This subject needs to be addressed in, we feel, one or all of the EIR topics listed below.

- LAND USE
- SOCIOECONOMICS
- PUBLIC HEALTH AND SAFETY
- PUBLIC SERVICES AND UTILITIES

SCE proposes to allow companies that currently do not reside on the power grid (new generators), to have the capacity to sell their power to the market. Because the lines are now full or overloaded, SCE wants to take existing power lines out of service to upgrade them and curtail existing suppliers. These curtailments will cost existing

power plants millions of dollars collectively to provide a benefit to someone else (the new generators).

SCE proposes, without mitigation or reimbursement to existing generators, to stop payments for (and not limited to):

- lost energy
- capacity
- · ancillary services
- tax benefits
- other related revenue streams to existing generators.

SCE simply wants to send the generators a curtailment notice to stop generating or reduce generation.

These generators may have:

- · debt obligations
- power purchase agreements with minimum delivery requirements
- certain onerous financing structures in place requiring minimum production
- operators who are barely maintaining profitability due to low power prices
- generation entities who have shareholder obligations to maximize profits

These generators are harmed by being asked to curtail or shutdown for the benefit of others.

There is also a negative trickle down effect of being asked to curtail and that results in lower revenues for associated parties. Examples such as maintenance companies relying on generation based payment structures; lower land rent payments to land owners that have turbines located on their property; reduced payments for management and accounting services for those production based structures are a few affected parties.

SCE should be required to compensate affected generators for their lost production. Existing generators do not benefit from the addition of more capacity. Edison and the rate-payers benefit from the additional capacity and therefore should reimburse the affected generators for this benefit. The costs of curtailment are an inherent cost of this transmission project, and should not be absorbed by the independent generators who will be curtailed.

In light of the 2011 CPUC approved risk sharing structures of new power purchase agreements, PG&E has a provision allowing 5% of expected annual generation to be curtailed for economic reasons with generators receiving their full contract price for all curtailed energy (excluding PTC). SCE has a curtailment cap between 50 and 200 hours per year, with compensation and a discounted buyback option for any excess curtailment. The commission already sees a huge issue regarding unpaid curtailment. These above solutions are simply to address economic curtailments.

When we discuss curtailment for the benefit of other projects, FERC states that curtailment cannot be unduly discriminatory or preferential. Shutting down generators without compensation in preference to other generators is discriminatory. The West of Devers upgrades are not for system reliability or for maintenance purposes; the

upgrades are to allow new generators to interconnect to the system. Existing generators already have paid substantial costs for their interconnection facilities, and continue to be charged significant interconnection related charges. These generators are entitled to receive the benefit of their bargain, and should be able to deliver energy to customers using the interconnection facilities and transmission access that they have paid significant sums of money to have access to.

Each West of Devers line is going to be increased by approximately 400% in carrying capacity. Therefore, one completed line could handle the load of all four (4) existing West of Devers lines. SCE should be required to plan construction activities around bringing one line online as soon as possible to be able to carry the load of all of the West of Devers lines. This would significantly reduce or mitigate months or years of curtailments. If the generators are made "whole" and reimbursed for their lost revenues and tax benefits outlined above, this mitigation would still be appropriate to mitigate rate-payer costs (those revenues paid to generators to curtail so they are not harmed).

Turning off and on high voltage substations ranging from 12 kV to 115 kV adds a level of risk and safety concern every time we are asked to open and close equipment; not to mention increased labor costs to handle those requests. Shutting down or curtailing older wind generation units too, carry a hazard especially in high winds. Wind turbines and I am sure other generation types are designed to run and stop only in an emergency.

For the reasons above, we request the commission direct SCE to mitigate damages to renewable generators. Generators must be made "whole" with payments made to those companies during times of curtailment or SCE created congestion.

And finally, SCE's construction schedule should place an extremely high priority on the least amount of curtailment (limited to low renewable generation times of the year (Oct-Feb)) of existing generation and actively devise plans to build the lines in such a way as to achieve little to no curtailment for the benefit of the rate payers and the current power suppliers.

Thank you for your review and attention to these comments.

Brian Halloran,

Painted Hills Wind Developers, JV

DESERT WIND ENERGY ASSOCIATION

2045 E. Tahquitz Canyon Way Palm Springs, CA 92262

TO: Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager) California Public Utilities Commission & U.S. Bureau of Land Management

c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002 Fax and Voicemail: (888) 456-0254 Email: westofdevers@aspeneg.com

June 12, 2014

RE: Southern California Edison's West of Devers Upgrade Project

(Application A.13-10-020, filed October 25, 2013)

The comments herein are made on behalf of the Desert Wind Energy Association. In reviewing the Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project Proposed by Southern California Edison ("SCE") Application No. A.13-10-020, we find that the notice fails to address severe impacts that can be easily mitigated by amendment to the construction plan.

The Coachella Valley wind energy projects, now consisting of over 500MW of installed capacity, exist pursuant to established policies of the State of California as implemented by The Public Utilities Commission. Local landowners including the undersigned were implored by Edison to build windfarms, as it turned out in an attempt to facilitate the licensing of San Onofre reactor number 2. Thereafter Edison turned on the windfarms and in fact was fined \$8,000,000 by your agency for "QF bashing" a label created at the time to define Edison's gorilla war against wind energy.

Now Edison has designed the West of Devers Upgrade Project in a fashion which will unnecessarily curtail these projects with the loss of their nonpolluting energy for a very protracted period of time. The PUC should never allow a project which denies California their clean renewable power as it is inconsistent with its legal duties nor should Edison be allowed to fulfill its long held dream of "getting rid" of the wind projects in the Coachella Valley by bankrupting them with illegal and ill-considered curtailments. The PUC should not be a party to this outrage.

The effect of curtailing existing power plants, specifically renewable energy projects in the immediate area for a period of years, stops hundreds of megawatt hours of clean non- polluting renewable generation for an extended period of time via an ill- considered plan to expand Edison power lines. This subject needs to be addressed in one or all of the EIR topics listed below.

- LAND USE
- SOCIOECONOMICS
- PUBLIC HEALTH AND SAFETY

PUBLIC SERVICES AND UTILITIES

SCE proposes to allow companies that currently do not reside on the power grid (new generators), to have the capacity to sell their power to the market. Because the lines are now full or overloaded, SCE wants to take existing power lines out of service to upgrade them and curtail existing suppliers. These curtailments will cost existing power plants millions of dollars without any assurance that the new projects will ever be built.

SCE proposes, without mitigation or reimbursement to existing generators, to stop payments for (and not limited to):

- lost energy
- capacity
- ancillary services
- tax benefits
- other related revenue streams to existing generators.

SCE simply wants to send the generators a curtailment notice to stop generating or reduce generation.

These generators may have:

- debt obligations
- power purchase agreements with minimum delivery requirements
- certain onerous financing structures in place requiring minimum production
- operators who are barely maintaining profitability due to low power prices
- generation entities who have shareholder obligations to maximize profits

These generators are harmed by being asked to curtail or shutdown for the benefit of others, with no assurance that the new projects will ever be constructed given environmental and Edison opposition to their development.

There is also a negative trickle down effect of being asked to curtail and that results in lower revenues for associated parties. Examples such as maintenance companies relying on generation based payment structures; lower land rent payments to land owners that have turbines located on their property; reduced payments for management and accounting services for those production based structures are a few affected parties. You should also be mindful of the significant lost tax revenue to local governments.

SCE should be required to so manage its construction project so that there is no curtailment of these valuable clean resources and if any curtailment is in fact allowed, compensate affected generators for their lost production. Existing generators do not benefit from the addition of more capacity. Edison and the rate payers benefit from the additional capacity, if the developers do in fact build future projects, and therefore should reimburse the affected generators for this benefit.

In light of the 2011 CPUC approved risk sharing structures of new power purchase agreements, PG&E has a provision allowing 5% of expected annual generation to be curtailed for <u>economic</u> reasons with generators receiving <u>their full contract price for all curtailed energy</u> (excluding PTC). SCE has a curtailment cap between 50 and 200 hours per year, with compensation and a discounted buyback option for any excess curtailment. The commission already sees a huge issue regarding unpaid curtailment. These above solutions are simply to address <u>economic</u> curtailments, and unfortunately do not consider the carbon issue.

FERC has a firm rule that curtailment and transmission access cannot be unduly discriminatory or preferential. SCE appears to be allowing their owned generation assets and out of State

generation to operate while curtailing the renewable generators located in California. This conduct is prohibited by Federal law. Shutting down generators <u>without compensation</u> in preference to other generators is discriminatory. The West of Devers upgrades are not for system reliability or for maintenance purposes; the upgrades are to allow new generators, not all of them renewable, to interconnect to the system, again curtailment to benefit other generators.

Each West of Devers line is going to be increased by approximately 400% in carrying capacity. Therefore, one completed line could handle the load of all four (4) existing West of Devers lines. SCE should be required to plan construction activities around bringing one line online as soon as possible to be able to carry the load of all of the West of Devers lines. This would significantly reduce or mitigate months or years of curtailments. If the generators are made "whole" and reimbursed for their lost revenues and tax benefits outlined above, this mitigation would still be appropriate to mitigate rate-payer costs (those revenues paid to generators to curtail so they are not harmed).

Renewable generation has a special problem. Once the prime mover is lost (wind, sun, steam, heat) it can never be recovered. Once the wind passes, the sun rays pass by unused, steam is released to avoid excessive pressure; there is no way to store or use that energy source later. Fossil fuel generators however, have the ability to store their fuel source to use later, or in some cases are even paid to 'stand-by'. Renewable generation is again unfairly damaged compared to other generators when asked to curtail for the benefit of others.

Turning off and on high voltage substations ranging from 12 kV to 115 kV adds a level of risk and safety concern every time we are asked to open and close equipment; not to mention increased labor costs to handle those requests. Shutting down or curtailing older wind generation units too, carry a hazard especially in high winds. Wind turbines and I am sure other generation types are designed to run and stop only in an emergency.

For the reasons above, we request the commission direct SCE to mitigate damages to renewable generators and avoid the loss of clean renewable power for the citizens of California. Generators and the public must be made whole.

SCE's construction schedule should place an extremely high priority on the least amount of curtailment (limited to low renewable generation times of the year (Oct-Feb)) of existing generation and actively devise plans to build the lines in such a way as to achieve little to no curtailment for the benefit of the rate payers and the current power suppliers. The only way to enforce this policy is to make Edison pay for curtailed energy capacity and other revenue items due the Coachella Valley Wind Projects.

Sincerely.

Frederick VV. Nob

Chairman.

Desert Wind Association



June 12, 2014

Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager) California Public Utilities Commission and Bureau of Land Management c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94101-3002

Via E-mail to westofdevers@aspeneg.com

Re: Southern California Edison's West of Devers Upgrade Project (Application A. 13-10-020, filed October 25, 2013)

Dear Ms. Blanchard and Mr. Paul,

In reviewing Southern California Edison's ("SCE") Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project Application No. A.13-10-020, BayWa r.e. Wind, LLC ("BayWa") finds that the notice fails to address significant negative impacts that need to be addressed and included in the mitigation portion of the EIR.

This EIR addresses the need for additional transmission capacity in order to serve new renewable energy projects in Imperial County, but there is no discussion in either the <u>Socioeconomic</u> or <u>Public Services and Utilities</u> impacts, any proposed mitigation to existing generators that will be affected by curtailments associated with these proposed upgrades. Curtailing existing generators, especially renewable energy generators in the immediate area, for up to four years, without reimbursement, is a severe impact that needs to be mitigated.

SCE proposes to construct these upgrades to facilitate new renewable generation without regard for impacts to existing renewable and conventional generators' contractual and financial obligations. BayWa's Wagner Wind Project, located in Riverside County, has already suffered significantly from non-reimbursed curtailment orders for upgrades of the Devers Substation since it reached commercial operations in December 2012: It has lost approximately \$130,070 in non-reimbursed curtailment requests over 63 separate calendar days, which averages approximately \$2,064 per day. The figure above includes \$97,000 in revenue lost from our inability to deliver energy as well as \$33,070 in lost Production Tax Credit benefits. The Wagner Wind Project delivers its energy to Riverside Public Utilities under a long-term contract with obligations to the utility and its ratepayers. An additional four years of curtailments to benefit new, yet to be constructed, renewable energy facilities at the expense of existing renewable generators such as Wagner Wind is untenable and discriminatory.



In addition to compensating generators that will be damaged from curtailment, SCE's construction schedule should place extremely high priority on minimizing the curtailments during peak energy producing times.

This can be accomplished by scheduling the bulk of the work requiring generators to turn off during the low wind production months of the year, which are approximately October through February. SCE has long-term operations data and knowledge from a number of long-term operating wind assets in the Coachella Valley that it can use to plan its construction schedule. In addition, it is our understanding that the capacity of the new line is expected to increase over the line's current capacity by 400%. Therefore, one completed line could handle the load of the four existing West of Devers lines. SCE should be required to plan construction activities around bringing one line online as soon as possible to be able to carry the load of all the existing lines. This would significantly mitigate months or years of curtailments.

We understand the benefit of these upgrades, however these upgrades cannot come without compensation to generators that have been in service and will continue to be in service providing California with renewable energy.

Sincerely,

Kate Valentine

Assistant Project Manager – Development

BayWa r.e. Wind, LLC

4365 Executive Drive, Suite 1470

San Diego, CA 92121

June 12, 2014

Billie Blanchard (CPUC Project Manager) / Brian Paul (BLM Project Manager) California Public Utilities Commission & U.S. Bureau of Land Management c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002 Email: westofdevers@aspeneg.com

Re: Southern California Edison's West of Devers Upgrade Project (Application A.13-10-020, filed October 25, 2013)

This letter is written on behalf of Energy Unlimited, Inc., ("EUI") and its affiliate, EUI Management PH, INC ("EUIM") who have operated a 25 MW wind power generator facility since 1985 located in the San Gorgonio Pass located about two miles west of the Southern California Edison Company ("SCE") Devers substation. Power from this facility is delivered to the Venwind substation which interconnects with the Devers substation. EUI is providing comments in connection with the Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement for the West of Devers Upgrade Project Proposed by Southern California Edison ("SCE") Application No. A.13-10-020 ("Subject Notice").

REIMBURSEMENT FOR CURTAILMENT LOSSES

EUI has reviewed the Subject Notice and unfortunately we find that it fails to address severe impacts that need to be addressed and also included in the mitigation portion of the EIR.

Specifically, the Subject Notice fails to address the reimbursement for costs and damages resulting from curtailing existing renewable energy projects in the immediate area for a period of years. A plan to mitigate curtailment related losses needs to be incorporated into the overall project plan.

During the past several years, EUI has directly experienced with increasing frequency the impacts of curtailment to its wind generation assets. Turning off and on high voltage substations creates a safety concern every time we are asked to open and close equipment. In addition to increasing operations labor costs, shutting down or curtailing older wind turbines is hazardous especially in high winds, when such uncustomary outages can seriously damage operating equipment.

When curtailment occurs on windy days, our project will loose production revenue. EUI will never recover this revenue as we are not able to store power we do not sell. Additionally,

curtailment can increase the cost of power required to restart wind turbines which otherwise would be generating power. Uncompensated curtailment in the spring and summer months when production and pricing are highest can have a devastating impact on our project's ability to fund operations, especially when energy rates are low.

Looking forward, new power contracts which EUI is seeking to obtain, contain output performance requirements and penalties for underperformance. To the extent curtailment triggers penalties under these contracts, generators should be made whole for any such losses.

To mitigate the impact of curtailment, SCE should be required to compensate affected generators for their lost production and other curtailment-related damages. As existing generators like EUI do not benefit from the addition of more capacity which would result from the subject project, basic fairness would suggest that they should be reimbursed for losses resulting from the subject project by those who benefit from the additional capacity.

For the reasons above, we request the commission to direct SCE to mitigate damages to renewable generators resulting from curtailment.

CONSTRUCTION SCHEDULE MITIAGATION

In addition to the above reimbursement mitigation, the construction schedule for the subject project should place an extremely high priority on limiting curtailment to periods of low renewable generation times of the year (Oct-Feb) and actively devise plans to minimize curtailment for the benefit of the ratepayers and the current power suppliers.

Thank you for your review and attention to these comments.

Sincerely,

David S. Lamm, Esq.

EUI President

EUIM Vice President

Appendix D-3

Comment Letters from Tribal Governments



May 29, 2014

Brian Paul, Project Manager Renewable Energy Coordination Office Bureau of Land Management 1661 S. 4th Street El Centro, CA 92243

Re.: West of Devers (WOD) Transmission Line Upgrade Project

Dear Mr. Paul:

Thank you for contacting the Cabazon Band of Mission Indians regarding the above referenced project.

The project is located outside of Cabazon Reservation lands. The Tribe has no specific archival information on the above referenced site indicating cultural activity or that there may be Native American burial or religious sites.

We look forward to continued collaboration in the preservation of cultural resources or areas of traditional cultural importance.

Sincerely,

Judy Stapp Director of Cultural Affairs

Appendix D-4

Comment Letters from Private Citizens

Comment Form

West of Devers Upgrade Project Riverside and San Bernardino Counties





BANNING

Please print legibly. For more information, visit the project web site: http://www.cpuc.ca.gov/environment/info/aspen/westofdevers/westofdevers.htm Thank you for your comments.
Date: May 19 2014
Name*: Joel mondoza y Vivginia mendoza.
Affiliation (if any):*
Address: 55435 San Pierre R.d.
City, State, Zip Code:* White water C.A. 92282
Telephone Number:* 1 951 849 3573
Email:*
Comment:* No haldamos ingles.
Las torres de electricidad pasan a monos
de 200 pres de mi casa. Tenemos dos hijos
paquaños que juegan debajo de las lineas
de electricidad quicieramos sabar si el riazgo
de peligro es alto o sipasara algun
accidente quien som el responsable de
resolver el problema.
gracias per su atención.
Please send me notifications by: email I do not want to be on the project mailing list
*This information may be released if requested under the Freedom of Information Act. Individual respondents may request that we withhold their

home address from the record, which we will honor to the extent allowable by law. If you wish us to withhold your name and/or address, you must state this prominently at the beginning of your written comments. All submissions from organizations or businesses will be available for public inspection in their entirety.

Your comments will help determine the scope and content of the environmental document and identify alternatives and measures to reduce impacts. Submit comments by mail using this comment sheet (fold, stamp, and mail); attach additional sheets if needed. Please submit comments by June 12, 2014. You may also submit comments by email to westofdevers@aspeneg.com or by phone (888) 456-0254.

Speaker Registration Card

(Please Print)

Name: Edward Miller

Affiliation (if any): Behning CHy Council

BANNING 5/19

Is There any effect of the project on the connection to The Banking electric utility?

Email: West of Devers Upgrade Project EIR/EIS

From: robert wyser

Sent: robert wyser

Swyser2@gmail.com>
Thursday, May 22, 2014 10:17 AM

To: joseph.schaefer@sce.com
Cc: West Of Devers Project

Subject: West of Devers Upgrade Project

Attention: Mr. Schaefer and Public Scoping BLM staff.

Reference: Proposed Project to upgrade Transmission Line Segment 1, Loma Linda, CA.

Property 25926 Mission Road, Loma Linda, CA 02354-6526

I have some Questions and Commends in reference to your mailed Project Preparation of May 2014.

I'm the Owner of the Property, I'm 84 Years old and somewhat handicapped. Therefor, I will not be able to attend the Public Scoping Meeting in Loma Linda Civic Center on Tuesday May 20, 2014.

We have four Transmission Towers on our Land, they will be replaced by four new Towers. (I assume the new location is indicated by the outline of the wooden stakes in the Ground on the Property)

In your segment on "AGRICULTURAL RESOURCES", on the notice of Preparation I need clarification in reference to: "Temporary Impacts", "Potential Impacts", "Long term Impacts".

I assume you would have to remove some of our Orange trees to make room for the new Transmission Towers, I further assume that many more trees would be damaged during the construction process. To hear your assessment and solutions is appreciated.

I'm in particular concerned by your Statement:" *Project would potentially converted farmland to non-agricultural use.* Are you planning to implement zoning to eliminate agricultural use? Do you have an approximate Schedule (Time table) relocating the Transmission Towers, Line segment 1?

Mr. Schaefer, I do hope we find fair and equitable solutions to our concerns and work together as we have in the past.

Sincerely, Robert Wyser

SOUDER COMMENTS AT THE EDISON SCOPING MEETING IN BEAUMONT MAY 21, 2014

I spoke at the meeting in Beaumont and made the following comments (not necessarily in this order: (Note that I am a resident of Solera at Oak Valley Greens, a 55+ community)

- 1. The current closest towers are approximately 100 ft. from the homeowners' property on the southern edge of the 300ft right of way. The location of the 2 new towers will be 50ft and 100ft from there. I believe that this will be highly objectionable to the property owners whose yards are up against that border. Especially since the new towers will be taller than the one that is currently the closest. The placement of the towers so much closer to the residents' property lines would likely lower property values and if they are paced there, there should be some compensation to the property owners. If the new towers were moved to 50ft inside of the North side of the 300ft right of way, they would be more than 100ft from any homes. This would be much better.
- 2. The truss style towers are unsightly and not very aesthetic. Pole type towers are used elsewhere in the electrical transmission system and would be much more tolerable (less objectionable?).
- 3. Although EMF radiation should theoretically be reduced due to the pairing of circuits, this issue of electromagnetic radiation is still a major concern. We have an Emergency Preparedness Committee in our Homeowners' Association. While Doing radio testing with handheld, battery powered radios near the power lines, we noticed 60/120 cycle buzz in the radio audio. This implies that they are receiving radiation from the power lines. This should be explored further.
- 4. The Edison Right of way easement agreements for the 300ft wide and 100ft wide easements are dated 1961 and 1945 respectively. When we asked if we could have certain activities within the easements, Edison has told us no, even though it appears from the agreements that those things are permitted. I feel that Edison should review, and possible rewrite the easement agreements and come to a new agreement with property owners. There are numerous examples of parks, RV storage facilities and landscape nurseries under power lines in similar conditions. As a minimum, Edison should provide copies of the latest easement requirements or expectations.
- 5. Edison should agree in writing to replace restore any landscape to current landscape conditions after any damage that the construction of the towers may cause.
- 6. Since it appears that Edison will be abandoning the 100ft wide right of way on the North side of the 300ft right of way, we would like for Edison to relinquish rights back to the land owners (Solera at Oak Valley Greens), or at least relax the restrictions there.

Comments not made at the meeting:

The Association has considered projects such as an outdoor concert area, additional parking area, replacing much of the grass with drought tolerant plants, and game courts such as shuffle board and horseshoe pits. See 6. Above.

Bill Souder 1750 Snowberry Rd. Beaumont CA, 92223 951 797-3956 bzybill@gmail.com

Bill Souder 5/29/14

Email: West of Devers Upgrade Project EIR/EIS

From: fergusonslf@verizon.net

Sent: Wednesday, June 04, 2014 10:21 PM

To: West Of Devers Project **Subject:** Towers D-V117 and DEC-10

Comment: My concerns are about the placement of towers D-V117 and DEC-10 replacing old towers M87-74, M27-74 and PP123238. The old towers are obtrusive and some say a health hazard. The new towers will bee even more obtrusive. I would suggest that the towers be moved away from the homes and more to the middle of the corridor, if not to the north side of the corridor. I don't understand why the towers would be placed even closer to the homes. Please consider moving the towers to the north side of the corridor to help the homeowners. It looks like the towers would line up better on the north side.

Thank You, Steve Ferguson June 11, 2014

Billie Blanchard, CPUC Project Manager/ Brian Paul, BLM Project Manager C/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104-3002

Subject: SCE West of Devers Upgrade Project: NOP EIR/EIS for Application No. A.13-10-020

We are Vincent and Martha van Rooijen, and we own and live in our home at 34967 Hagen Heights, Beaumont, CA, which is next to Segment 4 of SCE's proposed West of Devers Upgrade Project. Our neighborhood is called Fairway Canyon and we purchased our home new in 2007. We already have SCE transmission and towers too close to our homes—they don't need to be moved closer! SCE needs to be denied or they need to move the project an alternative route or at the very least underground this nightmare they are dropping on our homes.

WE ARE PERMANENTLY AND SIGNIFICANTLY NEGATIVELY IMPACTED BY THIS PROJECT

We are negatively affected by Segment 4 of the West of Devers Upgrade Project because SCE wants to remove 175 existing structures across from our home on a hillside that are 90' tall single-circuit towers, and 139' tall double-circuit towers, and replace them with 136 double-circuit towers that are 142' tall—and they want to install them side-by side where the center of the tower is only 50' from the southern edge of their right-of-way on a hill which is steep and extremely close to our property.

We are against this project. We do not believe that SCE is considering the Permanent, Unavoidable Significant Impacts to our home and neighborhood. They cannot mitigate these, and we should have the right to prevent them. We have just as much to use and enjoy our property as SCE does for theirs. We accept that they have existing towers placed at the top of the hillside away from our homes. We should not have to have the overbearing, behemoth towers right in our face. Space is the only buffer we have to their towers—now they are taking the buffer away and putting their towers literally right on top of us.

The SCE application shows how little they care about our neighborhood, as they are trying to move their towers and lines down the hillside, as close to our homes as they can. We will suffer from unmitigated 24-hour Noise, Severe Visual Impacts, Slope De-stabilization, and Electric and Magnetic Fields (EMF's) as well as Air Quality, Loss of Buffer from our homes, Fire Threats, Biological Wildlife and Vegetation Loss of Habitat, Dust, access roads,

SCE IS PIECE-MEALING AND AVOIDING DEALING WITH CUMULATIVE IMPACTS

SCE is <u>piece-mealing</u> its projects in our area and trying to escape appropriate cumulative impact and growth inducing review under CEQA! Consider CPUC Decision D.08-12-031, which approved SCE's El Casco Project (Application No. A.07-02-022). We know that the SCE transmission line route behind our house (the Northerly Route Option 3) was eliminated as an Alternative to SCE's preferred El Casco route south of San Timoteo Road—which was approved and built, and is not near homes in our area. However, now SCE come back with what essentially is the Northerly Route in the West of Devers Upgrade Project.

Letter to Billie Blanchard (CPUC) and Brian Paul (BLM) against CPUC West of Devers Upgrade Project Application No. A.13-10-020 June 11, 2013

The CPUC Decision analyzed the "Northerly Route Option 3"—which is right across from our home--as an Alternative, which was found <u>infeasible</u> by the CPUC: "...The CPUC finds that specific economic, legal, social, technological, and other considerations, including those considerations set forth in the EIR, make the Route Alternative Option 3 <u>infeasible</u>. Specifically, this alternative is environmentally less desirable than the adopted Project because the environmental impacts it would cause would be more severe, as it would impact a greater number of residential structures." (CPUC El Casco Decision D.08-12-031, Attachment A, CPUC CEQA Facts, Pg A-74)"

It is egregious for SCE to come back now in Application A.13-10-020 and submit for what is actually the Northerly Route Option 3—by calling it a "new" project, "West of Devers Upgrade Project. This route was considered only as an alternative to the El Casco route that ended up on SCE's original route south of San Timoteo Road. This 'new' application for the West of Devers Upgrade Project is just a mirror of the **former rejected, infeasible Northerly Route Options**.

Further, the EIR says it was CPUC's idea for SCE to study the Northerly Option as an Alternative to their proposed El Casco 115 Transmission Line Upgrade Route south of San Timoteo. However, SCE says it's always been something they wanted, and that it came available after they negotiated with the Morongo Indians—this was mentioned in the El Casco EIR as one of the reasons for not pursuing the Northerly Route and instead building the El Casco southerly route instead. If SCE needs additional capacity, why didn't they bring this up previously with El Casco? We think it is because they have become masters at gaming and piece-mealing the system. They come in with pieces at a time, when they full well know, they will be back in the same area once they get one set of improvements done.

WE EXPECT MORE SCE PIECE-MEAL APPLICATIONS ON THE NORTH HILLSIDE

For example, SCE's current application is for changing out transmission lines next to our home and replacing all the existing towers with larger, bigger towers, side-by-side, and moving the new towers down the hill south-right next to our homes. Their plan shows 200' available on the north side when they install this new set of double-circuited towers down the south hill on top of us. After this is done, it looks obvious they will apply again for the 200' on the northern hillside for more giant double-circuit towers side-by-side, further intensifying the towers so where there is one, there will be four.

As they are now, the existing towers are not right next to each other—their spacing alternates between the single and double-circuit towers, with the single towers spaced <u>95'</u> away from the southern edge of their right-of-way, and the double-circuit s towers are <u>220'</u> away.

We are highly concerned because we will be damaged from this project. SCE wants to intensify the use of double-circuit towers, significantly increase the size of their towers, which have a larger footprint and will bear down on our home and destabilize the hillside, double the towers up side-by-side and move them significantly closer to our home and other homes on our street.

TABLE ES-2: SIGNIFICANT UNAVOIDABLE-CLASS I-IMPACTS FROM EL CASCO EIR-NORTHERLY ROUTE

In addition, the El Casco EIR studied three Northerly Route options; two were tossed out as not worth further study, and Northerly Route Option 3 was thoroughly studied in the El Casco EIR and identified as <u>infeasible</u>! The Northerly Route was found to have more receptors (<u>THAT WOULD BE OUR HOMES</u>) which would be unavoidably and permanently significantly negatively impacted by Noise and Visual impacts—greater than SCE's El Casco route. We also note that the Northerly Route was shown to have unavoidable and permanently significant negative Air Quality, Biological Resources, and Hazards—especially Fire impacts—here is the list El Casco EIR Page ES-42 that lists all the terrible impacts from the Northerly Route when it was analyzed in the El Casco EIR just a few years ago. All of these must be addressed in SCE's new West of Devers Application:

Table ES-2. El Casco EIR Significant Unavoidable (Class I) Impacts of the Northerly Route Option 3

- AQ-1 (Construction emissions exceed regional significance criteria)
- AQ-2 (Construction emissions exceed localized significance criteria)
- AQ-3 (Emissions contribute to climate change)
- N-3 (Noise from operation of the overhead subtransmission line)
- CR-4 (Pole Replacement Has the Potential to Indirectly Impact Historical Resources)
- V-13 (Increased structure contrast, industrial character, view blockage, and skylining)
- Cumulatively exceed regional emission thresholds
- Cumulatively exceed localized emission thresholds
- Cumulatively increase greenhouse gas emissions impacting climate change
- Cumulatively cause temporary or permanent loss of native vegetation communities
- Cumulatively cause loss of foraging or breeding habitat for wildlife
- Cumulatively introduce non-native and invasive plant species
- Cumulatively result in a loss of nesting birds
- Cumulatively result in indirect or direct loss of listed plants
- Cumulatively result in indirect or direct loss of Quino Checkerspot habitat
- Cumulatively result in habitat loss or disturbance to listed birds including migratory birds and raptors
- Cumulatively result in the electrocution of listed and special-status bird species;
- Cumulatively result in subtransmission line collisions by listed and special-status bird species
- Cumulatively result in the loss of special-status plant species
- Cumulatively result in indirect or direct loss of individuals or direct loss of habitat for sensitive wildlife
- Cumulatively result in the loss of special-status reptile species
- Cumulatively result in the loss of burrowing owls
- Cumulatively result in the loss of foraging habitat or disruption of nesting for special-status raptor species
- Cumulatively result in the loss of the American badger; Cumulatively result in loss of special-status rodent species
- Cumulatively result in the loss of jurisdictional waters and wetlands; and Cumulatively result in the loss or restriction of habitat connectivity in Constrained Linkage 22
- Cumulatively expose people or structures to a significant risk of loss, injury or death involving wildland fires
- Construction activities would cumulatively degrade surface water and groundwater quality
- Operational activities would cumulatively degrade surface water and groundwater quality
- Cumulatively result in a substantial permanent increase in ambient noise levels
- Cumulative impacts to a perceived increase in industrialization of the landscape

DETAILED STUDIES AND PUBLIC MEETINGS ARE NEEDED

- I am requesting that CPUC/BLM has a meeting with our neighborhood, as well as our Homeowner's Association, Fairway Canyon HOA, as part of the EIR process.
- In addition, this project should be a topic at the monthly "Beaumont Cares" meeting sponsored by the City of Beaumont at City Hall.
 - Any meeting with our neighborhood should be set up with the Fairway Canyon HOA Board President, Mr. Len Leach, and should be held at the Fairway Canyon Clubhouse located at 36189 Champions Drive, Beaumont, CA 92223; Phone No: (951) 922-6444.
- All meetings should be noticed using traditional and online media, including these:
 - 1. The Press Enterprise Newspaper
 - 2. The San Bernardino Sun
 - 3. The Banning-Beaumont Record Gazette
 - 4. The Calimesa News Mirror
 - 5. The Desert Sun
 - 6. Beaumont-Banning Patch (http://banning-beaumont.patch.com)
 - 7. Southern California Daily Buzz on Facebook https://www.facebook.com/groups/socaldailybuzz/
 - 8. Beaumont-Cherry Valley Neighborhood Watch on Facebook (https://www.facebook.com/groups/1452471834973667/)
 - Yucaipa-Calimesa Neighborhood Watch on Facebook (https://www.facebook.com/groups/293419937468885/)
- All of the following areas need detailed studies are needed.
 - 1. Aesthetics/Visual—permanent negative change to view from homes next to project.
 - 2. Air Quality and Greenhouse Gas—Air Quality impacts are extremely negative
 - 3. Biological Resources-Vegetation—there is habitat and vegetation affected
 - 4. Biological Resources-Wildlife—birds, owls, coyotes, mountain lions, and wildlife are affected
 - 5. Geology and Soils—hillsides could be destabilized—there has been flooding in area
 - 6. Hazards and Hazardous Materials—EMT's are too close to our homes; increase Fire hazard
 - 7. Hydrology and Water Quality—scraping out hillside and putting in concrete
 - 8. Land Use—Industrializing our neighborhood and towers are not compatible next to homes
 - 9. Noise—24 hour noise is unacceptable and previous studies showed this could not be mitigated
 - 10. Public Health and Safety—Fire Hazard, EMT's, poor Air Quality
 - 11. Public Services and Utilities—which agency shoulders ongoing emergency costs, Beaumont?
 - 12. Recreational Resources—project prevents trail development and eliminates wildlife corridor
 - **13. Transportation and Traffic**—new access roads will be built; dirt and noise too close to homes
 - 14. Cumulative Impacts, including potential for future transmission lines in the WOD Corridor
 - 15. Growth Inducing Effects—is this for current demand, or does this project beget more growth?
 - 16. Adequacy of CEQA and NEPA, ensuring effective coordination between CPUC, BLM and BIA
 - 17. Consideration of a reasonable range of alternatives Review our Alternatives thoroughly!
 - **18.** Enforceable and effective mitigation measures—Which Agency reviews/holds SCE accountable?

WE HAVE SUGGESTIONS AND ALTERNATIVES FOR THIS PROJECT

We offer the following significant suggestions and alternatives for this SCE Application:

- 1. If CPUC wants this project, SCE should move it to the El Casco route that was just built. The El Casco route does not run through any neighborhoods in our area of Beaumont. They need to show a route that merges to their Morongo line that does not affect homes.
- 2. If they cannot find a route that does not go right next to homes, they need to underground their facilities in these locations. In the El Casco Decision, CPUC was against undergrounding. CPUC needs to be more flexible and consider the long-term positive impact of undergrounding, rather than being worried about setting precedence. These are new projects, neither 'grand-fathered' in, nor routine maintenance. Residents should be given consideration. Undergrounding should be used strategically to help resolve permanent, unavoidable significant negative impacts.
- 3. If SCE is allowed to proceed without undergrounding, the CPUC should move the towers to SCE's 200' on the north side of the hill where there are no homes and only vacant land. There was a development that went bankrupt during the recession and all that is left is weeds and dust as the former developer never finished grading or building even one house. This side of SCE's property has no development at all—it is vacant. Let the next developer determine the buffers they need since they have a chance to plan for this SCE project, and we did not.
- 4. The vacant property has many planning steps to go through and putting the SCE towers next to vacant land is preferred over putting them right on top of our homes, which had no ability to plan for this route. It would be preferred to have the area undergrounded, but given hurting every resident who has already been living here with unavoidable, permanent significant impacts is not acceptable, when there is vacant land on the other side of the hill—the north side that is not affected now, and the developer of that land would be able build their project considering the West of Devers Upgrade Project 142' towers rather than having no options at all like our neighborhood.
- 5. CPUC should study, and take action to find out why SCE did not clearly provide information that they would return with the Northerly Route on the West of Devers line when they applied for El Casco—this should have been part of the El Casco EIR. We deserve accountability on this! SCE had ample time and opportunity as part of the project description and EIR to inform us and CPUC they would be back for the Northerly Route on Devers even if they got El Casco. This is bait and switch.
- 6. If shown that SCE knew they wanted both lines, the CPUC should deny this project and require them to submit their projects in full—not piecemeal.
- 7. CPUC should implement stricter rules on information they require from the CPUC so neighborhoods like ours are not subject to piece-meal abuse of the application system.

Letter to Billie Blanchard (CPUC) and Brian Paul (BLM) against CPUC West of Devers Upgrade Project Application No. A.13-10-020 June 11, 2013

Please review our comments and request, and consider that we have spent time and energy to respond to the NOP for this EIR/EIS.

Please see the attached photos of how close SCE's existing West of Devers Towers and Transmissions Lines are to our homes on Hagen Heights in Beaumont. As you can see by the photos, the existing lines are already close to our homes and affect our views---we understood this when we moved in. There has been no more mention of the Northerly Route along Devers since the CPUC approved the El Casco Project in 2008. Look at the photos and see that the existing smaller towers are 95' away from our homes and the larger towers are 200' away from our houses, and SCE is proposing to lower them into our backyards over 170 feet closer for two double-circuit 142' towers. Would you or anyone else reviewing this want to live like this?

Please review our comments, take seriously our suggestions, and look at these pictures of our homes on Hagen Heights in Beaumont. How much closer can the lines and towers come before our houses are unlivable?







Hagen Heights, Fairway Canyon Neighborhood, Beaumont, California: Looking at existing SCE Devers Line

We are concerned for our health and welfare and that we will be the ones living with Permanent, Unavoidable, and Significant Impacts from SCE's West of Devers Upgrade Project. Aren't we already impacted by SCE—does it have to get worse? Find another route or underground!

We want to be included in all future mailings and notifications for this project.

Email is the preferred method: marthad100@yahoo.com. Otherwise, mail us the information.

Martha Van Rooijen

Sincerely,

Vincent and Martha van Rooijen

34967 Hagen Heights Beaumont, CA 92223 909-709-7505 marthad100@yahoo.com

cc:

Len Leach, Board President Fairway Canyon HOA

City of Beaumont City Council Press Enterprise Newspaper San Bernardino Sun Newspaper Banning-Beaumont Patch

Email: West of Devers Upgrade Project EIR/EIS

From: HS <hgschnur@gmail.com>

Sent: Thursday, June 12, 2014 10:14 AM

To: West Of Devers Project

Subject: Letter against SCE CPUC Application No. A.13-10-020--West of Devers

Upgrade Project

June 12, 2014

TO CPUC/BLM:

Here is my letter against SCE CPUC Application No. A.13-10-020--West of Devers Upgrade Project. This project is too close to my home--period. SCE towers already close to our homes--we live with this. They shouldn't be able to move them any closer. Either move the route to another place, underground the project by my home and our neighborhood, or move the entire project on the 200 feet of SCE right-of-way on the otherside of the hill--northerly, where they show nothing, and there is just vacant property--it should not bear down on my backyard, or my neighbors.

See pictures in letter and attached.

Please keep me notified of any information on this project.

Horst Schnur 34970 Hagen Heights Beaumont, CA 92223

Appendix D-5

Comments Received at Scoping Meetings

Speaker Registration Card

(Please Print)

Name:

AVID DOHERTY





