

Comment Set D1 – Jack Horne

1 June 27, 2016

2

3 VIA EMAIL

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

13 Dear Ms. Orsaba:

14 Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact
15 Report (DEIR) circulated by the California Public Utilities Commission (CPUC) on April 29,
16 2016. On behalf of Southern California Edison (SCE), the proponent of the Mesa Substation
17 Project (Proposed Project) that is the subject of the DEIR, this comment letter and the attached
18 table address issues that apply to the entire DEIR, with a primary focus on the analysis of
19 alternatives. In light of the information provided in this letter, SCE requests that the CPUC
20 prepare a Final EIR that dismisses the One-Transformer, Two-Transformer, and Gas-Insulated
21 Substation Alternatives from consideration because all three fail to meet basic CPUC and SCE
22 Project Objectives, none substantially reduce environmental impacts as compared to the
23 Proposed Project (and are thus not environmentally superior), and the One-Transformer
24 Alternative is not technically feasible.

D1-1

25 **I. OVERVIEW OF SCE’S COMMENTS ON THE DEIR**

26 The DEIR concludes that the One-Transformer (1600 MVA) Substation, Two-Transformer
27 (1120 MVA) Substation, and Gas-Insulated Substation Alternatives, which were developed at
28 the CPUC’s direction, are environmentally superior to SCE’s proposed project. These
29 alternatives deviate from the very purpose of the Proposed Project. As noted in the DEIR, “[b]y
30 December 31, 2020 it is expected that approximately 4250 megawatts of electric generation in
31 the Western Los Angeles Basin will be retired to comply with the State Water Resources Control
32 Board Once-Through Cooling (OTC) policy, which aims to eliminate as much as possible coastal

D1-2

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

D1-2
cont.

D1-3

D1-4

D1-5

21
22 **First**, the One-Transformer Alternative is technically infeasible due to the combination of the
23 following reasons:

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

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

² DEIR at 1-6.

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

D1-5
cont.

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

D1-6

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

D1-7

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

D1-8

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

D1-9

34 **II. LEGAL STANDARDS GOVERNING THE ANALYSIS OF ALTERNATIVES IN** 35 **A DEIR**

36 As noted in the DEIR, the California Environmental Quality Act (Pub. Resources Code § 21000
37 *et seq.*, CEQA) and its implementing Guidelines (14 CCR § 15000 *et seq.*) require that an EIR
38 describe “a reasonable range of alternatives to the project, or to the location of the project, which

1 would feasibly attain most of the basic objectives of the project but would avoid or substantially
2 lessen any of the significant effects of the project....” (14 CCR § 15126.6(a); DEIR, at p. 3-2.)

3 CEQA does not establish a stringent limitation on the factors which a lead agency may consider
4 when determining whether an alternative is feasible. Rather, CEQA provides that such a
5 decision may rest on “economic, legal, social, technological, or other considerations.” (Pub.
6 Resources Code § 21081(a)(3).) Similarly, the CEQA Guidelines define “feasible” as: “capable
7 of being accomplished in a successful manner within a reasonable period of time, taking into
8 account economic, environmental, legal, social, and technological factors.” (Pub. Resources
9 Code § 21061.1; 14 CCR § 15364.)

10 **III. THE DEIR’S ANALYSIS OF THE ONE-TRANSFORMER (1600 MVA)**
11 **SUBSTATION ALTERNATIVE IS FLAWED**

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

D1-10

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

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

D1-11

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

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

³ DEIR at 1-4.

1 transformer in the One-Transformer Alternative would be approximately 40% larger in volume
2 than the Proposed Project's transformer bank and would result in higher current flow towards the
3 220 kV switchrack. The calculated current flow on the 220 kV side of a 1600 MVA transformer
4 bank exceeds 4000 Amps, which would require installation of 5000 Amp circuit breakers and
5 disconnect switches. If studies show that the short circuit duty on the 220 kV switchrack exceeds
6 63 kA, which is likely given the 220 kV lines would be on a common bus, then 80 kA circuit
7 breakers would be needed, which are not industry-standard size. Even if 220 kV 5000 Amp
8 circuit breakers and disconnect switches could be procured, it is reasonable to expect that the
9 schedule to obtain that equipment would be significantly longer than what would be necessary to
10 specify, procure, and receive the standard 4000 Amp equipment that is required for the Proposed
11 Project. These schedule impacts could result in impacts to the overall project in-service date.

12 Inclusion of non-standard equipment, such as the 533 MVA transformer banks and 5000 Amp
13 circuit breakers, also creates operations and maintenance concerns as this equipment would be
14 the only such units on the SCE system. Therefore, in addition to the aforementioned technical
15 issues, SCE would likely need to procure more than one spare 533 MVA single-phase
16 transformer due to the long procurement lead time and the unavailability of system spares for
17 this unique transformer size. Spare circuit breakers and disconnects may also be purchased for
18 similar reasons. Some of this spare equipment would need to be stored on-site at Mesa
19 Substation and off-site for location diversity, to facilitate rapid restoration. Consequently,
20 additional space would be required within the substation that was not apparently considered in
21 the rough schematic of this alternative as shown in Figure 3.4-1.⁴

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

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

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

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

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

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

12 CPUC Project Objective 1 is to:

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

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

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

⁵ DEIR Appendix B.

D1-11
cont.

D1-12

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

D1-12
cont.

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

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

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

D1-14

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

26 An N-2 of the Rio Hondo – Vincent #1 & 2 230 kV transmission lines would cause a
27 single transformer to be loaded to 1698 MVA⁶

28 In the case provided by ELCON⁷, the transformer bank impedance was lower than that modeled
29 by SCE. In ELCON's case, under an N-2 of the Rio Hondo – Vincent #1 and 2 220 kV
30 transmission lines, the 1600 MVA transformer bank loading reaches the 1920 MVA emergency
31 rating of the transformer bank. As SCE stated in response to Data Request ED-SCE-06, different
32 dispatch scenarios would increase loading on the 1600 MVA transformer bank:

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

⁶This value was based on SCE's modeled impedance.

⁷Cases provided in response to SCE's Data Request (5/16/2016) Question 1a.

1 33% to 50%, which will likely result in new generation connecting to the system. While
2 SCE cannot predict exactly where new renewable generation would be located,
3 generation connecting north of Vincent Substation would further exacerbate transformer
4 bank loading at Mesa Substation.⁸

D1-14
cont.

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

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

D1-15

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

16 *i. The One-Transformer Alternative degrades reliability.*

17 SCE's Objective 1 was:

18

19 *Provide safe and reliable electrical service.*

20

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

D1-16

33 Order of Events Involving the Proposed RAS

⁸Data Request ED-SCE-06 Question 2a.

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

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

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

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

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

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

23 The construction of the Proposed Project provides an additional point of 500 kV service
24 into SCE's metropolitan load center delivering power from Tehachapi wind resource area
25 or resources located in Pacific Gas and Electric service territory or the Northwest via the
26 500 kV bulk transmission network.¹⁰

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

⁹ DEIR at 1-4.

¹⁰ SCE PEA Page 2-4.

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

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

17 **D. The DEIR’s Identification of the One-Transformer Alternative As the**
18 **Environmentally Superior Alternative is Flawed.**

19 The DEIR asserts that the One-Transformer Alternative is considered environmentally superior
20 in nine resource areas.¹¹ However, the One-Transformer Alternative does not substantially
21 reduce environmental impacts. As noted above, CEQA requires that an EIR describe “a
22 reasonable range of alternatives to the project, or to the location of the project, which would
23 feasibly attain most of the basic objectives of the project but would avoid or substantially lessen
24 any of the significant effects of the project...”¹² According to the DEIR, the Proposed Project
25 has significant and unavoidable impacts in three areas: (1) aesthetics, (2) air quality, and (3)
26 noise. The One-Transformer Alternative does not avoid or substantially lessen these significant
27 impacts. In fact, the One-Transformer Alternative *increases* air quality impacts by adding truck
28 trips and construction time, and Air Quality is the *only* significant and unavoidable impact area
29 that the One-Transformer Alternative was ranked first in as compared to the other alternatives.¹³
30 Further, per the analysis in the DEIR, any other “reductions” to impacts in other resource areas,
31 all of which are determined to already be less-than-significant, either with or without mitigation,
32 either do not substantially lessen significant environmental effects or are largely deemed to be
33 “negligible” or “slight” or “substantially the same” as compared to the Propose Project. In short,
34 the One Transformer Alternative is not environmentally superior to the Proposed Project.

¹¹ DEIR at 5-22.

¹² 14 CCR § 15126.6(a); DEIR, at p. 3-2.

¹³ The DEIR ranks the GIS Alternative higher than the One-Transformer Alternative for reductions in both aesthetics and noise. DEIR at 5-7 to 5-9.

D1-16
cont.

D1-17

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

3 According to the DEIR, the One-Transformer Alternative would result in total reduced air
4 quality impacts over the construction period because the reduced substation footprint of about
5 11.6 acres would result in a shorter construction period and less ground disturbance, presumably
6 because it would require less grading.¹⁴ Also, according to the DEIR, although daily pollutants
7 would be about the same as the Proposed Project, the reduced construction period would result in
8 overall substantial decrease in total exhaust emissions and substantially reduce fugitive dust
9 emissions from ground disturbance.¹⁵ This analysis is flawed because it fails to take into account
10 the fact that the One-Transformer Alternative grading requirements for the remainder of the
11 Mesa Substation construction area would still need additional soil imports to balance the site,
12 soil that under the Proposed Project would have come from the grading work over a portion of
13 the 11.6 acres¹⁶ (as part of Phase 3).

14 Therefore, reduction of the proposed substation footprint by 11.6 acres actually *lengthens* the
15 construction period and *increases* the total in exhaust emissions. Per Table 2-7 of the project
16 description,¹⁷ Phase 3 grading quantities included 50,000 cubic yards (CY) of exported soil
17 based on the SCE Proposed Project. This represents approximately 5,000 truck trips for Phase 3.
18 The topography within the 11.6 acres is significantly higher in elevation than the proposed future
19 grades of the new substation; this accounts for approximately 150,000 CY of cut. As calculated,
20 the Proposed Project would use 100,000 CY of the soil cut in this area to serve as fill on the rest
21 of the project site, and export 50,000 CY (approximately 5,000 truck trips). If the Phase 3
22 grading does not take place as planned in the Proposed Project, the project site would still need
23 approximately 100,000 CY of fill.¹⁸ So, if Phase 3 did not include this grading work, then the
24 grading quantities in Table 2-7 would change from 50,000 CY of export to 100,000 CY of
25 import, approximately 10,000 truck trips. This would double the amount of truck trips for Phase
26 3 (from 5,000 export to 10,000 trips for import) required to grade the site for construction of the
27 One-Transformer Alternative and would therefore bring the total truck trips to 20,000 for Phases

¹⁴ DEIR, Table 5.3-1 and Figure 5-1 at 5-3 and 5-5.

¹⁵ DEIR at 5-4.

¹⁶ It should be noted that of the 11.6 acres approximately 2 acres are not included in the ruderal hillside, but are located east of the existing substation, adjacent to Greenwood Avenue. As described in the attached comment table, a revised figure 2-4 has been provided which reflects the current engineering design with the Operations building and Test and Maintenance Building relocated in the northeast corner of the substation. This area would be graded for construction of these buildings regardless of which project configuration is selected.

¹⁷ DEIR at 2-55.

¹⁸ In other words, the Cut Quantity for Phase 3 would be reduced from 375,000 CY to 225,000 because of the decrease of 150,000 CY of cut. Phase 3 needs 325,000 CY of fill: (325,000 CY needed- 225,000 CY available= 100,000 CY needed for import).

D1-18

D1-18a

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

D1-18
cont.

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

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

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

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

D1-19

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

D1-20

¹⁹ SCE’s original calculation for grading truck trips, as submitted with its PEA, estimated 30,000 truck trips as a result of grading activities. SCE updated this estimate, as reflected on Table 2-7 in the DEIR to a total of 15,000 truck trips. However, it should be noted that the Air Quality Calculations used as the basis for the Air Quality analysis in the DEIR used the outdated 30,000 truck trips originally submitted.

²⁰ DEIR at 5-10.

²¹ Figure 4.3-1 and Table 4.3-1 of the DEIR, Figure 5 of Appendix D of the DEIR.

²² Figure 5 of Appendix D of the DEIR.

²³ Figure 5 of Appendix D of the DEIR.

D1-18b

1 within this area is not habitat for least Bell’s vireo²⁴ and the latter has not been documented on
2 the Mesa substation site,²⁵ only within the adjacent nursery on the 500-kV transmission line
3 location, documented once, and only during migration. Therefore, the One-Transformer
4 Alternative would not substantially lessen biological impacts. In addition, higher valued habitat,
5 coastal sage scrub, would still be impacted in the One-Transformer Alternative (*i.e.* grading for
6 220 kV and 66 kV tower pads, general grading/soil transfer for leveling the site, and grading for
7 drainage installation). SCE and Army Corps are consulting with the USFWS to obtain the
8 appropriate permits.

D1-20
cont.

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

D1-21

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

D1-22

28 **IV. THE DEIR’S ANALYSIS OF THE TWO-TRANSFORMER (1120 MVA)** 29 **SUBSTATION ALTERNATIVE IS FLAWED**

30 31 **A. The Two-Transformer (2-1120 MVA) Substation Alternative Does Not Meet** 32 **CPUC Project Objectives.**

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

D1-23

²⁴ April 9, 2015 SCE Letter to USFWS. RE: Southern California Edison Company’s Mesa Substation Project – least Bell’s Vireo Potential Habitat and Permitting; USFWS response/communication, Jonathan Snyder, April 15, 2015.

²⁵ Figure 5 of Appendix D of the DEIR.

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

D1-23
cont.

4 In the power flow case study provided to SCE by ELCON, the 220 kV bus configuration was
5 altered as compared to the Proposed Project. The Proposed Project operates the 220 kV bus in a
6 split configuration to prevent short circuit duty from exceeding the rated capabilities of the
7 standard 220 kV circuit breaker. According to the power flow case provided by ELCON,
8 however, the 220 kV bus tie breaker was closed with one transformer bank connected on either
9 side of that circuit breaker, which results in excessive short circuit duty values on the switchrack
10 when combined with the contributions from all twelve 220 kV transmission lines connected to
11 that switchrack. When the tie breaker was opened to alleviate the short circuit duty issue, it
12 resulted in one of the 500/220 kV transformer banks reaching its normal rating of 1120 MVA.
13 Just a slight modification in the renewable generation dispatch assumption or generation capacity
14 in the Western LA Basin would cause an overload condition. Due to this thermal transformer
15 overload the Two-Transformer Alternative fails to satisfy CPUC Objective 1. Further, similar to
16 the effect on the One-Transformer (1600 MVA) Substation Alternative, implementing this
17 alternative as suggested with two transformer banks would also change the number of required
18 positions in the 220 kV switchrack, not just the 500 kV switchrack and transformer bank areas,
19 thereby resulting in the need to redesign the entire 220 kV switchrack. It is anticipated that the
20 redesign effort needed to incorporate the Two-Transformer (1120 MVA) Substation Alternative
21 would require approximately 9-12 months to modify not only the electrical design of both the
22 500 kV and 220 kV switchracks, as well as the transformer bank areas, but also the overall site
23 grading design to match the new substation layout. Considering that the construction of the 220
24 kV switchrack is one of the critical activities to be performed during Phases 1 and 2 of the
25 overall construction sequencing, and must be completed prior to demolition of the existing
26 substation in order to clear an area sufficient to build the 500 kV switchrack, the overall schedule
27 impacts resulting from this redesign effort would significantly jeopardize the successful
28 completion of this project by the required in-service date.

D1-24

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

D1-25

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

32 *Provide safe and reliable electrical service.*

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

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

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

D1-25
cont.

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

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

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

D1-26

22 **V. THE DEIR’S ANALYSIS OF THE GAS-INSULATED (GIS) SUBSTATION**
23 **ALTERNATIVE IS FLAWED**

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

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

26 *Address projected violations of NERC Standard TPL-001-04, WECC Regional Business*
27 *Practice TPL-001-WECC-RBP-2, and CAISO Planning Standards that would occur upon*
28 *retirement by December 31, 2020, of generators that use OTC.*
29

D1-27

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

²⁶ DEIR at 3-10.

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

D1-27
cont.

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

D1-28

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

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

D1-29

20
21 **A. Mitigation Measure Hydrology-6 Should Be Deleted Because The Mesa**
22 **Substation Site Is Not Within A Dam Inundation Area.**

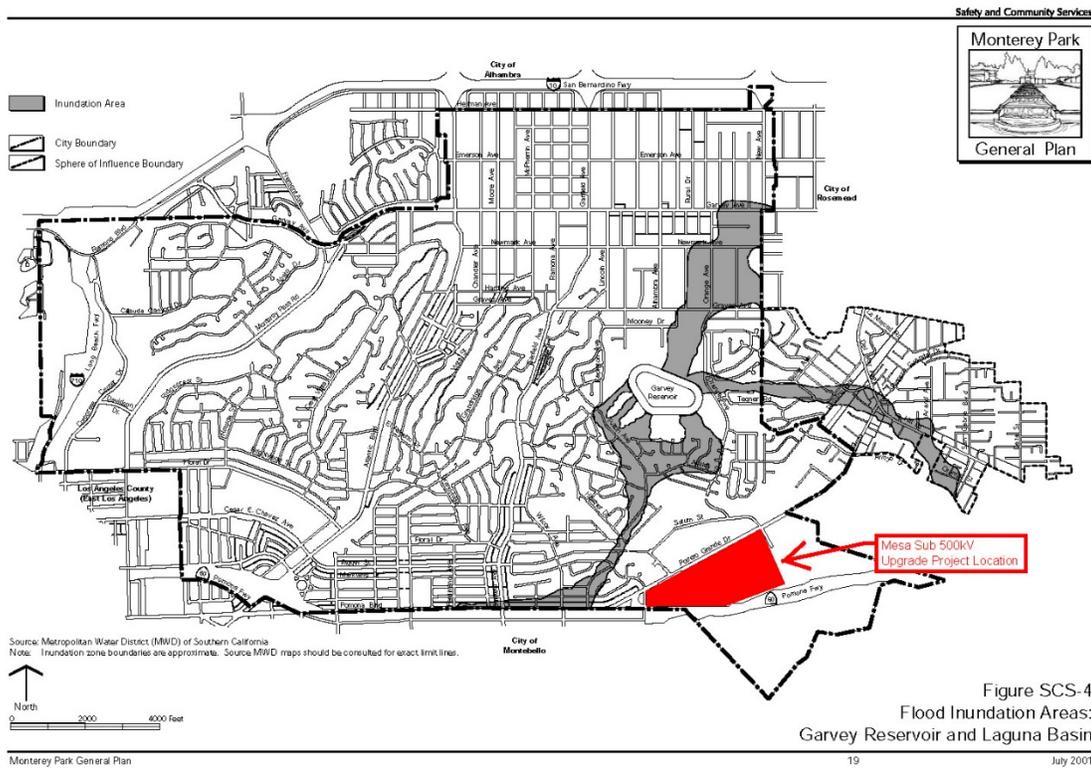
23
24 The DEIR erroneously concludes that the Mesa Substation site is located in a dam inundation
25 area.²⁸ Mitigation Measure Hydrology -6 (HY-6) would require SCE to install dam inundation
26 protection measures into the substation design, which could include a concrete perimeter wall
27 and flood gates at entry ways, elevation of substation equipment, and sealing equipment
28 buildings.

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

²⁷ DEIR at 5-23.

²⁸ DEIR at 4.8-27.

²⁹ City of Monterey Park General Plan (2001): <http://www.cityofmpk.org/484/Baseline-Noise-Environment>; Figure SCS-4, Flood Inundation Area: Garvey Reservoir and Laguna Basin: <http://www.cityofmpk.org/DocumentCenter/View/1078>



D1-29
 cont.

1
 2 The Mesa Substation and nearby telecommunications, transmission, subtransmission, and
 3 distribution infrastructure would not be located in the inundation area of the Garvey Reservoir.
 4 Therefore, Mitigation Measure HY-6 is inapplicable and should be deleted.

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

D1-30

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

³⁰ DEIR at 4.10-23.

³¹ DEIR at 4.10-25.

1 **VII. CONCLUSION**

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

10

11

Regards,

12

/s/ Angela Whatley

13

Angela Whatley

Response to Comment Set D1: Jack Horne

- D1-1 This comment provides an overview of Southern California Edison’s (SCE’s) comment D1. Responses to comments D1-11, D1-12, D-13, D1-14, D1-16, D1-24, D1-25, and D1-27 address how the three considered alternatives meet most of the California Public Utilities Commission (CPUC) project objectives and explain that meeting SCE’s objectives from the Proponent’s Environmental Assessment (PEA) is not a requirement for alternatives under the California Environmental Quality Act (CEQA). All three alternatives substantially reduce a significant effect of the proposed project, as required under CEQA for alternatives, as explained in response to comment D1-17. Refer to response to comment D1-18, which contains the revised discussion of the environmentally superior alternative. Refer to responses to comments D1-11, D1-12, D1-13, D1-14, D1-16, and D1-18, which address the feasibility of the One-Transformer-Bank Substation Alternative.
- D1-2 This comment provides an overview of SCE’s comment D1. Refer to responses to comments D1-13, D1-24, D1-26, D1-27, and D1-28 regarding project objectives and implementation of an alternative after the Once-Through Cooling (OTC) compliance date of December 31, 2020.
- D1-3 This comment provides an overview of SCE’s comment D1. Refer to responses to comments D1-18, D1-20, D1-21, D1-22, D1-26, and D1-28 regarding the comparison of alternatives analysis and to response to comment D1-18 regarding the environmentally superior alternative. Refer to response to comment D1-17 regarding how the screening of alternatives takes into account whether an alternative would substantially reduce a significant impact of the proposed project. Refer to response to comment D1-18 regarding the environmentally superior alternative and comparison of alternatives analysis.
- D1-4 This comment provides an overview of SCE’s comment D1. Refer to response to comment D1-17, which explains the CEQA requirement that an alternative avoid or substantially reduce any significant effect of the project.
- D1-5 This comment provides an overview of SCE’s comment D1. Refer to responses to comments D1-11, D1-12, D1-13, D1-14, D1-16, and D1-18, which address the feasibility of the One-Transformer-Bank Substation Alternative.
- D1-6 This comment provides an overview of SCE’s comment D1. Responses to comments D1-11, D1-12, D-13, D1-14, D1-16, D1-24, D1-25, and D1-27 address how the three considered alternatives meet most of the CPUC’s project objectives.
- D1-7 This comment provides an overview of SCE’s comment D1. Refer to responses to comments D1-18, D1-20, D1-21, D1-22, D1-26, and D1-28 regarding the comparison of alternatives analysis and to response to comment D1-18 regarding the environmentally superior alternative. Refer to response to comment D1-17 regarding how the screening of alternatives takes into account whether an alternative would substantially reduce a significant impact of the proposed project.

- D1-8 This comment provides an overview of SCE’s comment D1. Refer to responses to comments D1-29 and D1-30 regarding the feasibility of mitigation measures.
- D1-9 This comment provides an overview of SCE’s comment D1. Responses to comments D1-11, D1-12, D-13, D1-14, D1-16, D1-24, D1-25, and D1-27 address how the three considered alternatives meet most of CPUC project objectives and explain that meeting SCE’s objectives from the PEA is not a requirement for alternatives under CEQA. All three alternatives substantially reduce a significant effect of the proposed project, as required under CEQA for alternatives, as explained in response to comment D1-17. Refer to responses to comments D1-11, D1-12, D1-13, D1-14, D1-16, and D1-18, which address the feasibility of the One-Transformer-Bank Substation Alternative. Refer to responses to comments D1-29 and D1-30 regarding the feasibility of mitigation measures.
- D1-10 This comment provides an overview of SCE’s comment D1. Refer to responses to comments D1-11, D1-12, D1-13, D1-14, D1-16, and D1-18, which speak to the feasibility of the One-Transformer-Bank Substation Alternative. Responses to comments D1-11, D1-12, D-13, D1-14, and D1-16 address how the One-Transformer-Bank Substation Alternative meets most of CPUC’s project objectives and explains that meeting SCE’s objectives from the PEA is not a requirement for alternatives under CEQA. Refer to response to comment D1-18 regarding the environmentally superior alternative.

D1-11 **SCE Objectives**

CEQA Guidelines section 15126.6(a) requires that alternatives considered in an Environmental Impact Report (EIR), among other requirements, meet most of the basic project objectives. Section 15124(b) of the CEQA Guidelines requires that an EIR contain a “statement of the objectives sought by the proposed project. . . . The statement of objectives should include the underlying purpose of the project.” It is within the discretion of the Lead Agency to select objectives for the project. As stated in *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1163, “The process of selecting the alternatives to be included in the EIR begins with the establishment of project objectives *by the lead agency*” (emphasis added). The CPUC’s consideration of SCE’s objectives is discussed in Section 1.2.2.2 of the Draft EIR, “Consideration of SCE’s Objectives.” Objective 7 from SCE’s PEA is:

Design and construct the proposed project in conformance with SCE’s approved engineering, design, and construction standards for substation, transmission, subtransmission, distribution, and telecommunications system projects.

Section 1.2.2.2 of the Draft EIR explains that the CPUC considered all of SCE’s objectives in formulating its project objectives, and this specific objective was not incorporated into CPUC’s objectives because it does not address the underlying purpose of the project. The underlying purpose of the proposed project is not to design and build a project that complies with SCE standards, but rather to accomplish the three CPUC objectives set forth below. Section 1.2.4, “Detailed Description of CPUC Project Objectives,” describes the rationale for the CPUC’s identification of the three

CEQA objectives for the proposed project. Those objectives are:

1. Address anticipated violations of the North American Electric Reliability Corporation (NERC) Standard TPL-001-04 (NERC 2015), Western Electricity Coordinating Council (WECC) Regional Business Practice TPL-001-WECC-RBP-2 (WECC 2011), and California Independent System Operator (CAISO) Planning Standards that would occur upon retirement by December 31, 2020, of generators that use OTC.
2. Avoid introduction of new violations of NERC, WECC, and CAISO standards.
3. Maintain electrical service by minimizing service interruptions during project implementation.

The One-Transformer-Bank Substation Alternative meets all three of the CPUC's project objectives.

Technical Feasibility

In addition to meeting most of the basic project objectives, CEQA Guidelines section 15126.6(a) also requires that alternatives considered in an EIR be potentially feasible. "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines section 15364). In this comment, SCE identifies issues that it claims make the One-Transformer-Bank Substation Alternative technically infeasible. Specifically, SCE claims the following:

- SCE does not have a standard design for a 1600-megavolt ampere (MVA) transfer bank and is not aware that the equipment is used as standard equipment in California or the United States.
- Each transformer in the One-Transformer-Bank Substation Alternative would be 40 percent larger in volume than the transformers that would be utilized for the proposed project. This would require procurement of non-standard circuit breakers and disconnect switches, if such equipment could be procured. Procurement of such equipment could take significantly longer than it would for the proposed project.
- The larger transformer bank would also necessitate changes to the standard substation layout to accommodate the increased length, width, and height.

Redesign of the proposed project to incorporate the One-Transformer-Bank Substation Alternative would require an estimated 9 to 12 months to take into account the change in number of positions in the 220-kilovolt (kV) switchrack, change in number of positions in the 500-kV switchrack, change in overall site grading design, and change in size of the transformer bank areas.

SCE claims that it does not have a standard design for a 1600-MVA transformer bank and is not aware that the equipment is used as standard equipment in California or the United States. The CPUC acknowledges the statement that SCE does not have a standard design for the One Transformer-Bank Substation Alternative and is not aware of use of such equipment as standard equipment elsewhere. The CPUC, however, is

aware of such a transformer being in use at the Bonneville Power Administration's Maple Valley 500/230-kV substation. The Maple Valley Substation utilizes a 1600-MVA transformer bank with three phases, each of which is 533 MVA, similar to the One-Transformer-Bank Substation Alternative.

The CPUC presumes that SCE's claim that the transformer bank would be 40 percent larger in volume than the proposed project's transformer bank is not a claim about size but about capacity, given that 1600 MVA is approximately 40 percent more than 1120 MVA. SCE claims that, due to the higher capacity, non-industry-standard circuit breakers and disconnect switches would be needed and procurement could take significantly longer than for the proposed project. It is reasonable to assume that non-standard equipment may be necessary based on the design of the One-Transformer Alternative. It is also reasonable to assume it may take longer to procure. However, the CPUC has no evidence regarding the specific length of time required for procurement of equipment.

Regarding SCE's claim regarding the longer design and procurement time, it is reasonable to assume that design of the alternative substation may delay implementation of the alternative, compared to the implementation of the proposed project, given that SCE would currently be designing the proposed project. However, this additional time of approximately 9 to 12 months is insufficient evidence to revise the EIR's conclusion that the alternative is potentially feasible.

SCE also comments that the alternative transformer bank presents other technical challenges, including from transporting "larger-sized 533 MVA transformer bank units to the project site" on "larger-than-normal trucks." SCE does not state how much larger it believes a 533 MVA transformer would be. However, it is possible that transformers for the alternative may be the same size as or smaller than those for the proposed project. Based on the Maple Valley Substation, each transformer used for the alternative could occupy an area that is about 37 by 13 feet, with a height of about 15 feet (without brushings installed). For comparison, each transformer bank for the proposed project would occupy an area that is about 30 by 33 feet with a height of 35 feet, as described in the project description. Therefore, the CPUC is not aware of evidence to support the claim that the transformers used in a 1600-MVA transformer bank would most certainly be larger in size than the transformer used for the proposed project. The CPUC has insufficient evidence to revise the EIR's conclusion that the alternative is potentially feasible.

The EIR concludes that the One-Transformer-Substation Alternative is potentially feasible, as required by CEQA. However, the decision makers may consider the content of this comment, including SCE's statements regarding design standards and feasibility, as evidence in determining the feasibility of the One-Transformer-Substation Alternative.

Environmental Impacts of the One-Transformer-Bank Alternative

SCE notes the following regarding environmental impacts of the One-Transformer Bank Alternative:

- Non-standard transformer banks and circuit breakers would result in concerns

about operation and maintenance since it would be the only such equipment in the SCE system. Spare transformers, circuit breakers, and disconnects may have to be purchased and stored on site and off site, which would require additional space not shown in Figure 3.4-1.

- The larger size of the transformer banks may require use of oversized trucks and more lane closures and result in an impact to traffic.

SCE claims that spare equipment, such as circuit breakers, more than one spare transformer, and disconnects may need to be stored on site at Mesa Substation and that the One-Transformer-Bank Substation Alternative would require more space than is shown in the schematic in Figure 3.4-1 to account for storage. In response, the CPUC believes that Figure 3.4-1 sufficiently depicts the proposed alternative footprint, and the CPUC is not aware of any evidence to support the assertion that the schematic in Figure 3.4-1 is inadequate.

SCE claims that the Comparison of Alternatives analysis does not discuss additional lane closures needed to ship larger transformers on “larger-than-normal trucks.” As previously described, it is possible that transformers could be the same size as or smaller than those used for the proposed project. While the transformers could also be larger than those used for the proposed project, it would be speculative at this point to assume that “larger-than-normal” trucks would be required to transport the transformer and that those trucks would cause subsequent lane closures greater than those examined in the proposed project because specifics about transformer size and necessary truck size cannot be known until design of the transformer. CEQA Guidelines section 15145 states that “[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.” Therefore, the EIR properly excludes an analysis of this impact.

D1-12 CEQA Guidelines section 15126.6(a) requires that alternatives considered in an EIR, among other requirements, meet most of the basic project objectives. The commenter states that the alternative does not address projected violations of NERC TPL-001-4 under each contingency included in Appendix B of the Draft EIR and specifically claims that the alternative does not address contingencies 4 and 5. The commenter correctly notes that contingencies 4 and 5 result in loading to 98 percent of capacity. The commenter states that the analysis assumed a lower transformer bank impedance than the minimum impedance under SCE standards; increasing the impedance to be consistent with SCE standards would result in higher loading under contingencies 4 and 5 that reach or exceed the emergency rating of transmission lines. However, designing and constructing the proposed project to meet SCE’s standards, including SCE’s standards for minimum impedance, is not part of objective 1 of the proposed project, or any objective of the proposed project, as described in response to comment D1-11. CPUC Objective 1 for the proposed project is:

1. Address anticipated violations of the NERC Standard TPL-001-04 (NERC 2015), WECC Regional Business Practice TPL-001-WECC-RBP-2 (WECC 2011), and CAISO Planning Standards that would occur upon retirement by December 31, 2020, of generators that use OTC.

The alternative was designed with a specific impedance, and the alternative meets the objective when using that specified impedance. The fact that One-Transformer-Bank Substation Alternative was designed with a lower impedance than SCE's standard minimum impedance is not evidence that the alternative does not meet Project Objective 1. The alternative, as designed and evaluated in the EIR, would address anticipated violations in Appendix B and would therefore meet Objective 1.

SCE also states that the impedance may be below what is readily available from the equipment suppliers. It is presumed that SCE is suggesting that this kind of equipment may take longer to procure and not that the equipment is not available at the impedance specified in the Draft EIR. It is reasonable to assume that non-standard equipment may take longer to procure. However, the CPUC is not aware of evidence regarding the specific length of time required for procurement of this equipment.

The commenter also states that the lower impedance value results in "the transformer bank reach[ing] its emergency rating following a contingency." First, it is acceptable under NERC, WECC, and CAISO standards for a transformer bank to reach its emergency rating following a contingency. Furthermore, all anticipated violations to be addressed under Project Objective 1 are listed in Appendix B of the EIR. Therefore, thermal loading on the transformer bank at the upgraded Mesa Substation is not considered a violation to be addressed under Project Objective 1 and is not listed in Appendix B. However, this potential overload could affect whether Project Objective 2 is met. However, because it is acceptable under NERC, WECC, and CAISO standards for a transformer bank to reach its emergency rating following a contingency, SCE's claims do not show that the project does not meet Objective 2.

D1-13 Project Objective 1 is to:

1. Address anticipated violations of the NERC Standard TPL-001-04 (NERC 2015), WECC Regional Business Practice TPL-001-WECC-RBP-2 (WECC 2011), and CAISO Planning Standards that would occur upon retirement by December 31, 2020, of generators that use OTC.

The date associated with Project Objective 1 (December 31, 2020) for retirement of generators that use OTC is not an objective for implementation of the proposed project, but is rather a target date for retirement of OTC generation. The Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) exists to ensure that schedules under the Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling do not disrupt California power supply. SACCWIS reports to the State Water Resources Control Board (SWRCB) and provides recommendations related to deadlines, project permitting constraints, and local area and grid reliability. The SWRCB may then amend the Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling. One possible amendment is to extend compliance dates. Therefore, retirement may occur after December 31, 2020. As a result, the inability of an alternative to be constructed by December 31, 2020, does not mean that alternative will not meet Project Objective 1. An alternative would meet Project Objective 1 if, after OTC generation retirement, whenever that ultimately occurs, the alternative would address projected violations. The proposed project would likely not come on line until after December 31, 2020, given a construction start date of early 2017 and anticipated construction timeline of 55 months, which would result in project

completion in late 2021. Therefore, the date associated with Project Objective 1 is a reference for when OTC generation is scheduled, but not guaranteed, to be retired. It is reasonable to assume that SCE has not designed a One-Transformer-Bank Substation Alternative and that implementing such an alternative would take longer than implementing the proposed project. Nonetheless, SCE's claims are not evidence that the One-Transformer-Bank Substation Alternative does not meet Project Objective 1.

SCE claims that the potential delay associated with implementation of the One-Transformer-Bank Substation Alternative would require OTC generating facilities to operate beyond the OTC generation compliance date, which would result in continued environmental impacts related to OTC generation operation until the project (or an alternative) is implemented. It appears unlikely, however, that the proposed project would be implemented until after the OTC generation compliance date (December 30, 2020). A later in-service date could result in delay of OTC generation retirement until at least late 2021. The CPUC cannot predict definitively how the final date of implementation of the project or an alternative would ultimately affect the OTC retirement deadline.

Insufficient information exists to provide a meaningful analysis of the environmental impacts of any potential delay of implementation of the project or an alternative. CEQA Guidelines section 15145 states that "[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." Assuming that SCE is correct in asserting that the alternative would result in delay of project implementation, the CPUC recognizes that delay of project implementation may cause delay of OTC retirement, which could result in continued environmental impacts from use of OTC. These impacts, which are already occurring under existing conditions, include thermal impacts from discharge of cooling water and impingement and entrainment impacts to marine life as a result of seawater withdrawal. It would be speculative to try to identify specific impacts related to extending the OTC generation retirement deadline. It is unknown, for example, which OTC generation would be kept on line in the case of OTC generation retirement delay—it is possible that either Redondo or Alamitos retirement may be delayed (CAISO 2016c). Which generator remains on line indicates which specific environmental impacts continue beyond the currently anticipated retirement deadline. The Redondo Beach Generating Station and the Alamitos Generating Station are located in two different environments and would have different ongoing environmental impacts on marine wildlife species if their retirement is delayed. The Redondo Beach Generating Station is located near the ocean and draws water from three submerged intake points within King Harbor and the Redondo Beach Marina (Tetra Tech 2008). Water is discharged north of the King Harbor breakwater, directly into the ocean, and near the entrance to King Harbor (EPRISolutions 2005). The Alamitos Generating Station is located inland, 2 miles northeast of Alamitos Bay along the west bank of the San Gabriel River. The intake for Alamitos Generating Station comes from two manmade channels, which draws water from the Los Cerritos Channel. The water is discharged into the San Gabriel River (Tetra Tech 2008). Specific environmental impacts of OTC retirement delay cannot be provided without knowing which generator might be kept online pending Mesa Substation's final in-service date.

The capacity of the OTC generator(s) that would be utilized in the case of the delay is also unknown, given that capacity is dependent on overall demand. Facility and

capacity utilized affect the amount of cooling water that would be used and therefore determine severity of environmental effects. It would be speculative to attribute any of the impacts to delay associated with implementation of a project alternative (or the proposed project) because (1) impacts are currently ongoing under existing conditions and (2) there are other unpredictable factors that may affect OTC retirement deadlines.

Comparison of impacts between the proposed project and the One-Transformer-Bank Substation Alternative would also be speculative. The EIR therefore need not evaluate these impacts.

D1-14 CEQA Guidelines section 15126.6(a) requires that alternatives considered in an EIR, among other requirements, meet most of the basic project objectives. The commenter claims that an N-2 contingency of the Rio Hondo-Vincent No 1 and No. 2 230-kV Transmission Lines would result in a transformer at Mesa Substation to be loaded to 1698 MVA when using SCE's modeled impedance. However, designing and constructing the proposed project to meet SCE's standards, including SCE's standards for minimum impedance, is not part of Objective 2 of the proposed project, or any objective of the proposed project, as described in response to comment D1-11.

SCE also states that different dispatch scenarios, including increased renewable energy resources to meet the new California renewable energy requirements, would "further exacerbate transformer bank loading at Mesa Substation" if the generation is connected north of Vincent Substation. Power flow data used for Objective 2 are data provided by SCE that were used in its 2014 annual reliability assessment, as described in A3-8. Allowing for integration of renewable energy into the grid to meet new renewable energy requirements is not part of Objective 2 of the proposed project, or any objective of the proposed project.

CPUC Objective 2 for the proposed project is:

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

A lower impedance and the SCE 2014 annual reliability assessment power flow data were used for the EIR analysis, which resulted in a finding that the One-Transformer-Bank Substation Alternative transformer would be loaded to 98 percent of the transformer's emergency rating, which is not a violation of NERC, WECC, and CAISO standards. Therefore, SCE's claims are not evidence that the One-Transformer-Bank Substation Alternative would not meet CPUC Project Objective 2.

However, the decision makers may consider SCE's standards and the modeled impedance value used for the alternative, as evidence of whether the One-Transformer-Substation Alternative is infeasible.

D1-15 Refer to responses to comments D1-13 and D1-14.

D1-16 The CPUC's consideration of SCE's objectives is discussed in Draft EIR Section 1.2.2.2, "Consideration of SCE's Objectives." SCE asserts that the EIR disregards SCE's first objective from the PEA, which was "Provide safe and reliable electrical service." As described on page 1-3 of the EIR, the CPUC incorporated this goal into CPUC Objectives

1 and 2. Addressing anticipated violations of reliability criteria as well as avoiding creation of new violations of reliability criteria are directly related to the provision of safe and reliable electrical service. CPUC's Objectives 1 and 2 are specific enough to aid CPUC in defining a reasonable range of alternatives to evaluate in the EIR.

SCE claims that implementation of a Remedial Action Scheme (RAS) is less reliable and reduces import capabilities when compared to the proposed project. The reliability-based objectives of the proposed project are to address a certain set of reliability criteria violations outlined in Appendix B of the EIR and to avoid introduction of new violations of reliability criteria. SCE states that the alternative is less reliable. The CPUC's study of the RAS found that implementation of the RAS for specific contingencies would avoid violations of reliability standards, as shown in Appendix B. Regarding import capabilities, as discussed in Section 1.2.4.1 of the EIR, thermal overloads following certain contingencies listed in Appendix B indicate that there is insufficient capacity on transmission lines to import energy to meet demand after OTC retirement. More energy would need to be imported through the Serrano Corridor, but it would have insufficient capacity. Although it is true that the One-Transformer-Bank Substation Alternative would provide less import capacity than the proposed project, the One-Transformer-Bank Substation Alternative addresses all contingencies in Appendix B. It also provides adequate import capacity to meet Objectives 1 and 2.

SCE asserts that the EIR disregards SCE's third objective from the PEA, which was "Allow greater flexibility in the siting of future generation projects to meet local reliability needs in the Western Los Angeles Basin while reducing the total amount of new generation required by providing additional transmission import capability." SCE states that the CPUC has minimally addressed system needs with little consideration for the future. As explained on page 1-4 of the EIR, the CPUC used its discretion as the Lead Agency for the proposed project to craft objectives focused on projected issues to address specific contingencies that would cause violations of reliability criteria. Other than speculation about "future changes in power flow patterns, as well as further reduction of generation resources in the Western Los Angeles Basin," as well as a statement that "limited operations of the Aliso Canyon Gas facility . . . may result in gas shortages," SCE does not indicate which specific, concrete future system needs the CPUC has insufficiently addressed, but rather states that the CPUC does not address the "overarching system need." The CPUC is not aware of evidence of probable system needs or future needs the proposed project is meant to address but would not address. Focusing on specific contingencies identified by SCE allowed the CPUC to consider a reasonable range of alternatives, as required by CEQA, that would address the specific violations the proposed project is meant to address, which are listed in Appendix B. The CPUC's CEQA project objectives therefore adequately took into account SCE's project objectives from the PEA as explained in the Draft EIR.

SCE states that limiting the substation footprint for the One-Transformer-Bank Substation Alternative would limit future grid expansion. Allowing for future grid expansion is not a CEQA objective for the proposed project. Allowing for future grid expansion for undefined needs at an unknown planning horizon is too broad to satisfy CEQA requirements to be a project objective because it would not help the CPUC define a reasonable range of alternatives.

SCE also claims that limiting the footprint of the Mesa Substation would result in

environmental impacts from expanding the substation in the future. However, as there are currently no future plans to upgrade the Mesa Substation beyond the proposed project, analyzing impacts from future expansions would be speculative and beyond the scope of this proposed project. (Draft EIR, p. 2-28 [“The extent and timing of any future expansion would be speculative because future demand is not defined and is often unpredictable in the long term given the number of variables affecting demand, such as energy efficiency, distributed generation, and demand response.”].) Future projects may also be required to undergo environmental review pursuant to CEQA.

Additionally, the EIR concludes that the One-Transformer-Bank Substation Alternative meets all objectives. Eventual expansion of the substation is not needed to meet the project objectives. Therefore, eventual expansion of the One-Transformer-Bank Substation Alternative and the environmental impacts of that expansion are not considered in this EIR.

SCE’s other related comments regarding cost and need of the proposed project are included in the project record for consideration by the decision makers. The comments do not raise an environmental issue; therefore, no further response is required.

D1-17 CEQA Guidelines section 15126.6(a) requires that an alternative evaluated in the EIR “avoid or substantially lessen any of the significant effects of the project,” not that the alternative reduce a significant *unavoidable* impact of the proposed project. Therefore, the fact that the One-Transformer-Bank Substation Alternative does not substantially avoid or reduce a specific significant *and unavoidable* impact of the proposed project is not germane to whether the alternative meets the requirement under CEQA Guidelines section 15126.2(a). The One-Transformer-Bank Substation Alternative, Two-Transformer-Bank Substation, and Gas-Insulated Substation Alternative all substantially reduce significant impacts to biological resources, as described in responses to comments D1-20, D1-26, and D1-28, respectively. Therefore, they meet the CEQA requirement to avoid or substantially lessen any of the significant effects of the project.

CEQA Guidelines section 15126.6(e)(2) contains the requirements for the environmentally superior alternative discussion in an EIR. It states that, “[i]f the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Refer to Section 5.4, “Environmentally Superior Alternative,” for a discussion of the environmentally superior alternative and conclusion that the One-Transformer-Bank Substation Alternative is the environmentally superior alternative. In determining the environmentally superior alternative, any potential reductions in impacts are considered. CEQA allows the Lead Agency discretion in the methodology used to identify the environmentally superior alternative and does not mandate that slight reductions in impacts or that similar levels of impacts be ignored when determining the environmentally superior alternative. CEQA also does not mandate that the environmentally superior alternative analysis ignore reductions in impacts that are less than significant. Therefore, the environmentally superior alternatives analysis appropriately took into account all reductions in impacts.

D1-18 SCE asserts that the One-Transformer-Bank Substation Alternative would result in increases in the total exhaust emissions because additional soil imports would be

needed on site. The area excluded from the disturbance area under the One-Transformer-Bank Substation Alternative was to be used for fill material for other parts of the substation site. SCE states that, without the soil from this area, additional soil would have to be imported, increasing the number of truck trips needed for Phase 1 and Phase 3 by 5,000 trips. SCE states that soil can be moved within the site 10 times faster than it can be imported, so the project construction timeline would extend about 6 months longer than the proposed project due to the additional soil import.

The area in Phase 3 as shown on Draft EIR Table 2-7 is topographically higher, making it a reasonable assumption that more soil would need to be imported under the One-Transformer-Bank Substation Alternative when the area is excluded from the project footprint. The One-Transformer-Bank Substation Alternative would slightly increase total exhaust emissions but would still substantially decrease fugitive dust created when compared to the proposed project. On balance, there would be a moderate reduction in air quality impacts. Thus, the One-Transformer Bank Substation remains environmentally superior to the proposed project for Air Quality. The following revision has been made to the analysis to reflect this and to update acreages changes based on revised geographic information system (GIS) data submitted by the applicant:

Pages 5-4 to 5-5:

Air Quality

~~Construction of the One-Transformer-Bank Substation Alternative would result in total reduced increased air quality emissions impacts over the construction period, but reduced fugitive dust emissions. though the maximum daily emissions during construction would remain the same as for the proposed project. While the reduced substation size would require less import of materials for building the substation itself, a shorter construction period and less ground disturbance, but construction of the One-Transformer-Bank Substation Alternative would also reduce the disturbance area by excluding the Phase 3 area shown in Figure 2-4. Under the proposed project, this area was to provide some of the fill required at the substation site. Without this fill available, SCE estimates that an additional 5,000 truck trips will be needed, in total, to import soil to the site. The additional total trips would increase overall exhaust emissions, and would slightly increase the maximum number of trips per day when compared to the proposed project. it is assumed that daily construction activities would not change in intensity. It is assumed that soil import would be needed during Phase I, when general site grading would occur, which would be approximately 18 months long for the proposed project. With an additional 6 months needed for soil transport, Phase I would be 24 months long. An additional 5,000 trips over Phase I of construction (24 months) equates to an average of approximately 11 truck trips per day, or 22 passenger-car-equivalent (PCE) trips, on each day of construction. Given that Phase I would have a maximum of 2,144 PCE daily trips for the proposed project, an increase of about 1 percent in trips and exhaust emissions would result in a slight increase in maximum daily quality exhaust emissions. Thus, daily maximum criteria pollutant emissions would be negligibly increased about the same under the One-Transformer-Bank Substation Alternative compared to the proposed~~

project. However, the reduced construction period at the substation would result in an overall substantial decrease in total exhaust emissions (Impact AQ-2 and Impact AQ-3). However, the reduced disturbance area (about ~~11.6~~ 14.4 acres less than the proposed project) would substantially reduce fugitive dust emissions from ground disturbance (Impact AQ-2 and Impact AQ-3). Given the substantial reduction in fugitive dust and the slight increase in maximum daily exhaust emissions, there would be a slight overall reduction in air quality impacts (Impact AQ-2 and Impact AQ-3).

For consistency with this change in the analysis and to update acreages changes based on revised GIS submitted by the applicant, the following revisions have also been made to the EIR:

Page ES-27, Table ES-3:

Air Quality: Substantially reduces ~~total exhaust emissions as well as~~ fugitive dust emissions from ground disturbance (Impact AQ-2, Impact AQ-3).

Page 3-5:

One-Transformer-Bank (1600-MVA) Substation	Would meet all basic project objectives	Potentially feasible	Substantially reduces impacts to traffic, air quality, and biological resources	Passes screening; evaluated further in Chapter 5 of EIR
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Page 5-11:

Greenhouse Gas Emissions

Overall greenhouse gas emissions from construction of the One-Transformer-Bank Substation Alternative would be ~~reduced compared to~~ greater than the proposed project. The smaller substation footprint would require additional soil import due to the reduced availability of on-site soil, as described under Air Quality, which would require more ~~translate into less grading and therefore less heavy equipment use and fewer truck trips to import and export soil. Less grading would be required on site, which would reduce heavy equipment use on site.~~ On balance, impacts would be similar to those of the proposed project, resulting in slightly reduced greenhouse gas emissions (Impact GHG-1) during construction.

All other construction impacts related to greenhouse gases under this alternative would be the same as those associated with the proposed project. Operations-related greenhouse gas emissions under this alternative would be the same as under the proposed project, since operations and maintenance activities would be about the same as under the proposed project.

Page 5-7:

Greenhouse Gas Emissions	<ul style="list-style-type: none"> Impact GHG-1 (less than significant) N/A—No impact reduced by alternatives 	Less (1) Similar (N/A)	Less (1) Similar (N/A)	Greater (3N/A)	One-Transformer-Bank Substation None
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Pages 5-12 through 5-13:

Population and Housing

It is presumed that the same maximum number of employees would be needed during construction under this alternative as under the proposed project. The duration of need for workers would, however, be ~~shorter~~ about 6 months longer than under the proposed project, as discussed under Air Quality. This could result in a negligible increase in ~~reduction of~~ the potential for temporary population growth in the area, compared to the proposed project, should construction workers relocate to the area. The impacts of this alternative and the proposed project would be substantially the same.

All other impacts related to population and housing would be the same as those associated with the proposed project.

Page 5-13:

Public Services and Utilities

The One-Transformer-Bank Substation Alternative would have a negligibly increased ~~reduced~~ potential for need for public services due to hazardous materials spills, fire, theft, and vandalism, as well as lower production of wastewater and storm water as a function of the longer ~~shorter~~ construction period at the substation site, as discussed previously under Air Quality, ~~and the reduced construction activity and substation footprint compared to the proposed project~~. Impacts would be substantially the same as the proposed project.

The smaller disturbance area associated with the One-Transformer-Bank Substation Alternative would require less water for dust control during construction than the proposed project. This alternative would reduce ground disturbance by about ~~17~~ 20 percent, which may also reduce water use for dust control (Impact PSU-5) at the substation by ~~17~~ 20 percent.

All other impacts related to public services and utilities would be the same as those associated with the proposed project.

Recreation

It is presumed that the same maximum number of employees would be needed during construction of this alternative as for the proposed project. The duration of need for workers would, however, be slightly longer ~~shorter~~ than for the proposed project, as previously discussed under Air Quality, resulting in a small potential

~~increase~~ ~~decrease~~ in the time that workers may need to relocate to the area. Thus, any increased use in recreational facilities due to temporary relocation of construction workers to the area could be negligibly ~~increased~~ ~~reduced~~ under the One-Transformer-Bank Substation Alternative compared to the proposed project. The impacts of this alternative and the proposed project would be substantially the same.

All other impacts related to recreation under this alternative would be the same as those associated with the proposed project.

Page 3-9:

Potential to Substantially Reduce or Avoid Significant Impacts

This alternative would substantially reduce ~~the following several~~ significant impacts, including:

- ~~**Air Quality:** Criteria pollutant Fugitive dust emissions during construction would be reduced since less ground disturbance and less grading would be required to accommodate the smaller substation footprint (reduces Impacts AQ-2, and AQ-3, and AQ-4).~~

Biological Resources: Gnatcatcher habitat and species impacts would be reduced since less activity would take place in gnatcatcher habitat (reduces Impacts BR-1, BR-2, and BR-4). The Environmentally Superior Alternative discussion has been revised as follows to take into account revisions in the comparison of alternative discussion made in response to comments D1-18, D1-20, D1-21, D1-22, D1-26, D1-28, and D2-221:

Pages 5-25 through 5-26:

5.4 Environmentally Superior Alternative

All three alternatives discussed in Section 5.3, “Comparison of Alternatives,” are considered environmentally superior to the proposed project. As shown in Table 5.3-3, the One-Transformer-Bank Substation Alternative is considered the most environmentally superior alternative in seven ~~nine~~ resource areas, and the Gas Insulated Substation Alternative is considered the most environmentally superior alternative in ~~two one~~ resource areas. For four ~~three~~ resource areas, all ~~none of the~~ three alternatives would be environmentally superior to the proposed project because they would result in similar impacts to the proposed. For traffic and transportation, all three alternatives would increase impacts, but only slightly. ~~have about the same level of impacts, and none is more environmentally superior than another; however, all three are environmentally superior to the proposed project.~~

Although the Gas Insulated Substation Alternative is environmentally superior for ~~noise and~~ aesthetics, this alternative could result in a substantial greenhouse gas impact that may exceed SCAQMD significance thresholds. As explained in Section 5.3.2.3, “Gas Insulated Substation Alternative,” the Gas Insulated Substation Alternative would result in a substantial reduction in aesthetic impacts due to the

different switchrack equipment. ~~Noise impacts would be only negligibly reduced, as a result of a shorter construction period in a small area close to sensitive receptors on Holly Oak Drive.~~ The Gas-Insulated Substation Alternative may result in a significant impact related to greenhouse gases that would not occur under the proposed project or under the One-Transformer-Bank Alternative. Recent California greenhouse gas policy indicates that California has determined the reduction of greenhouse gases to be an important goal for the state. Executive Order B-30-15, signed by the Governor on April 29, 2015, set an aggressive greenhouse gas reductions goal—40 percent below 1990 levels by 2030. The 2030 goal ultimately is an interim benchmark to the 2050 goal of 80 percent below 1990 levels. The Executive Order is only the latest state greenhouse gas reduction policy of many, including the California Global Warming Solutions Act of 2006. The Executive Order recognizes several severe, adverse impacts of global warming, including loss of snowpack, drought, increased wildfires, increased smog, and heat waves (State of California 2015). Due to the potentially grave impacts of greenhouse gas emissions, as recognized in the State’s latest aggressive policy action to reduce greenhouse gases, the decrease in long-term aesthetic ~~and short-term noise~~ impacts do not outweigh the substantial increase in long-term greenhouse gas emissions increase the Gas-Insulated Substation Alternative would cause compared to the proposed project and to the other alternatives considered.

The One-Transformer-Bank Substation is environmentally superior to all alternatives and to the proposed project in most resource areas. In particular, it is environmentally superior for permanent impacts to biological resources, which is given substantial weight due to the permanence of the impacts and the importance of habitat that would be impacted by the proposed project. In areas where it is not environmentally superior, the Gas-Insulated Substation is superior. The Gas-Insulated Substation Alternative’s long-term greenhouse gas impacts make it environmentally inferior to the One-Transformer-Bank Substation despite its benefits related to ~~noise and~~ aesthetics. The One-Transformer Bank Substation Alternative is therefore considered environmentally superior to the Gas-Insulated Substation Alternative. The One-Transformer Bank Substation Alternative is therefore the Environmentally Superior Alternative.

SCE notes that the delay in implementation could affect the potential to complete the project by December 2020. Public Resources Code section 21002 states that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects . . . [I]n the event specific economic, social, or other conditions make infeasible such project alternatives . . . individual projects may be approved in spite of one or more significant effects thereof.” CEQA Guidelines section 15091(a) provides that a public agency cannot “approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.” One possible finding, per CEQA Guidelines section 15091(a)(3) is that “[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures of project alternative

identified in the final EIR.” An alternative is feasible if it can be “accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.”

The EIR concludes that the One-Transformer-Substation Alternative is potentially feasible, as required by CEQA. However, the decision makers may consider the delay in implementation SCE associates with the One-Transformer-Bank Substation Alternative as evidence that speaks to whether the One-Transformer-Substation Alternative is infeasible.

D1-18a Figure 2-4 has been updated in the EIR to reflect that the current engineering of the proposed project includes the Operations Building and the Test and Maintenance Building in the northeast corner of the substation.

The One-Transformer-Bank Substation Alternative footprint is shown in Figure 3.4-1. SCE claims that under any alternative, the area in the northeast corner of the existing substation site would be graded for construction of the Operations Building and the Test and Maintenance Building. However, SCE is not responsible for designing the alternatives considered in the EIR. Alternatives considered in an EIR must be potentially feasible, avoid or substantially lessen any significant effect of the proposed project, and meet most of the basic project objectives. The CPUC has found that the One-Transformer-Bank Substation Alternative meets these requirements. CPUC has no evidence that exclusion of the northeast area referenced by SCE from the One-Transformer-Bank Substation Alternative would make the alternative infeasible, not meet most of the basic project objectives, or not avoid or substantially reduce a significant impact of the proposed project. Therefore, Figure 3.4-1 has not been revised.

D1-18b SCE notes that the air quality calculations it conducted to support the analysis in the EIR utilize an estimated 30,000 truck trips as a result of grading activities. That truck trip number was subsequently revised (to a total of 15,000 trips) without updating air quality calculations. The addition of 15,000 truck trips across a 4.5-year construction period (the “excess” trips included in the air quality calculations) would not make an appreciable difference to daily emissions, the metric used to determine significance, and therefore would not affect the analysis or conclusions in the Draft EIR. No revisions were made to the EIR in response to this comment.

D1-19 For the resources mentioned by the commenter, the EIR concludes the following regarding the impacts of the One-Transformer-Bank Substation Alternative when compared to the proposed project:

- A slight reduction in visual impacts (Impact AE-1)
- A negligibly lower reduction in impacts to undiscovered cultural resources (Impact CR-2)
- A slight reduction in erosion impacts (Impact GEO-5)
- Similar impacts to greenhouse gases (Impact GHG-1), as explained in response to comment D1-18

- Slightly reduced potential for water quality impacts (Impacts HY-1 and HY-3) and impacts on drainage patterns (Impact HY-4)
- Slightly reduced use of groundwater (Impact HY-2)
- No impact on land use (Impact LU-1)
- Similar impacts to construction noise (Impact NV-4), as explained in response to comment D2-221
- Substantially the same impacts to population and housing (Impact POP-1)
- Substantially the same impacts to public services, and a reduction in water use by 20 percent (Impact PSU-5)
- Substantially the same impacts to recreation (Impact RE-1)

See response to comment D1-20 regarding impacts to biological resources, response to comment D1-21 regarding impacts to traffic and transportation, and response to comment D1-22 regarding impacts to hazards.

D1-20 As the comment indicates, the One-Transformer-Bank Substation Alternative and the proposed Project would impact coastal California gnatcatcher habitat. However, compared with the proposed Project, the One-Transformer-Bank Substation Alternative would avoid impacts to approximately 9.5 acres of habitat, much of which has been identified as important coastal California gnatcatcher habitat by the United States Fish and Wildlife Service (USFWS) (Medak pers. comm. 2015; and see p. 4.3-4 of the Draft EIR “Agency Consultation”). Figure 5: Map 1 of 5 of the Draft EIR’s Appendix D shows one nest and multiple observations of coastal California gnatcatcher, as well as observations of yellow warbler, loggerhead shrike, and peregrine falcon, all special-status species, within the 9.5 acres that would be avoided by the One-Transformer-Bank Substation Alternative. The EIR has been modified to include additional details about the importance of this habitat.

The comment claims that the Draft EIR’s analysis of biological impacts for the One-Transformer-Bank Substation Alternative is flawed. SCE claims that the approximate area avoided under this alternative is not high quality coastal California gnatcatcher habitat because it is “ruderal with exotic non-native plant species;” that there has been no documentation of successful gnatcatcher nesting in the area that would be avoided, based on four years of data; and therefore, that this alternative would not substantially lessen biological impacts.

The Draft EIR uses an appropriate method to identify much of the non-native vegetation southeast of the Mesa Substation as suitable habitat for coastal California gnatcatcher. The Draft EIR uses the same definition of gnatcatcher habitat as the Biological Resources Technical Report (Appendix D of the Draft EIR) does for gnatcatcher. Suitable gnatcatcher habitat is considered to be:

- Coastal sage scrub with greater than 50 percent cover, consisting of species such as California sagebrush and or California buckwheat, or
- Areas consisting of a matrix of sparse, scattered coastal sage scrub shrubs and

annual/biennial vegetation with sufficient morphological structure and density to support coastal California gnatcatcher nesting and provide foraging opportunities.

As shown in the Draft EIR's Figure 5: Map 1 of 5 of Appendix D, coastal California gnatcatcher has been observed numerous times over multiple years foraging and nesting in native and non-native vegetation (see Figure 4.3.1 of the Draft EIR for vegetation mapping) in the project area, including within the area that would be avoided by the One-Transformer-Bank Substation Alternative in the Mesa Substation area. Figure 10: Map 1 of 3 of the Draft EIR's Appendix D outlines gnatcatcher habitat southeast of the existing substation; approximately 9.5 acres of the gnatcatcher habitat identified in this figure would be avoided under the One-Transformer Alternative. This figure also shows expected temporary and permanent impacts of the proposed project on this habitat. Suitable gnatcatcher habitat for this map was identified using the criteria in the two bullet points above, and appropriately includes both native and non-native vegetation (see Figure 4.3-1 of the Draft EIR). Table 11 of Appendix D of the Draft EIR calculates that the proposed project would impact approximately 23.45 acres of coastal California gnatcatcher habitat; the One-Transformer Alternative would avoid impacts to approximately 9.5 of those acres. Both the suitability of the non-native vegetation for gnatcatchers in the area, and the reduction in habitat area impacted under the One-Transformer Alternative are based on substantial evidence.

The comment states that no successful gnatcatcher nesting has occurred within the habitat avoided and considers this as evidence that the habitat is not quality habitat for the gnatcatcher and thus the One-Transformer-Bank Substation Alternative would not substantially lessen biological impacts. However, nesting attempts have been documented within the 9.5 acres identified as habitat (see Figure 5: Map 1 of 5 of the Draft EIR's Appendix D). In addition, successful nesting has been documented to occur adjacent to the area avoided and gnatcatchers appear to be utilizing the area that is contiguous with their successful nesting habitat for foraging during nesting season (see Figure 5: Map 1 of 5 of the Draft EIR's Appendix D, Figure 3A of Attachment A of the Draft EIR's Appendix G).

USFWS commented that the remaining gnatcatcher habitat in the project area, which includes the habitat avoided by this alternative, provides connectivity between gnatcatcher populations and is important for maintaining a viable population in the northern range of the species (Medak pers. comm. 2015). In addition, USFWS's comment on the Draft EIR acknowledges that the area adjacent to the Mesa Substation is gnatcatcher habitat, including the non-native vegetation that supports gnatcatcher foraging/sheltering, and recommended an increase in mitigation ratio for all gnatcatcher habitat permanently impacted by the project (see comment A1-3). In these comments, USFWS does not discount non-native vegetation that supports gnatcatchers nor suggest less mitigation. Based on this substantial evidence regarding the importance of the area avoided by this alternative for the gnatcatcher, the One-Transformer-Bank Substation Alternative would substantially lessen impacts on this species.

Figure 5: Map 1 of 5 of Appendix D also shows one least Bell's vireo sighting to the east of the existing substation site, in the 500-kV transmission corridor. Page 5-10 of the

Draft EIR listed least Bell's vireo as one of the special-status species that has been found in the areas southeast or east of the current substation. The commenter is correct that the habitat to the southeast of the substation, which includes the 11.6 acres avoided by the One-Transformer-Bank Substation Alternative, is not known least Bell's vireo habitat. However, the 11.6 acres contains habitat similar to the location where the vireo was observed (developed area with interspersed non-native vegetation) and is less than 0.25 mile away. Thus, the species could potentially utilize vegetation for foraging, cover, or resting within the avoided area. The EIR's conclusion that the One-Transformer-Bank Substation Alternative would substantially reduce biological resources impacts when compared to the proposed project is therefore supported by substantial evidence and expert analysis.

The comment also indicates coastal sage scrub would be impacted under the One-Transformer-Bank Substation Alternative. Approximately 0.16 acres of coastal sage scrub occurs on the Mesa Substation site that would be temporarily impacted under the proposed project and also under all of the evaluated alternatives (see Table 4.3-5 of the Draft EIR); this area of coastal sage scrub is not located within the approximately 11.6 acres in this area would be avoided under the One-Transformer Alternative (see Figure 4.3.1 of the Draft EIR for vegetation mapping). The comment does not identify locations where grading for the 220-kV and 66-kV tower pads, general grading/soil transfer, or drainage installation would occur, and does not offer evidence to show that these activities would have to occur in the approximately 11.6 acres this alternative would avoid in the area.

The following revision has been made to the EIR.

Page 5-10:

Construction of the One-Transformer-Bank Substation Alternative would result in reduced impacts on biological resources compared to the proposed project. ~~California eCoastal California~~ gnatcatcher, least Bell's vireo, loggerhead shrike, peregrine falcon, Swainson's hawk, and yellow warbler have been sighted in the areas southeast and east of the current substation; ~~California-coastal California~~ gnatcatcher is known to forage and nest in the area southeast of the current substation. Under the One-Transformer-Bank Substation Alternative, about 11.6 acres of habitat southeast of the existing substation would be avoided compared to the proposed projects. ~~This habitat is also the higher-value habitat on the substation site because special~~Special-status bird species (including nesting and foraging coastal California-coastal gnatcatcher) ~~are known to occur~~have been documented within the 11.6 acres that would be avoided by this alternative in this area within this habitat (Figure 5: Map 1 of 5, Appendix D of the Draft EIR).

Approximately 9.5 acres that would be avoided under the One-Transformer-Bank Substation Alternative has been identified as coastal California gnatcatcher habitat. Figure 5: Map 1 of 5 of the Draft EIR's Appendix D shows numerous occurrences of coastal California gnatcatcher within the avoided area, and Figure 10: Map 1 of 3 of the Draft EIR's Appendix D classifies approximately 9.5 acres of the 11.6 acres that would be avoided as gnatcatcher habitat. The area that would be avoided is classified primarily as non-native vegetation (Figure 4.3-1 of the Draft EIR);

however, both native and non-native vegetation in the Mesa Substation area are considered gnatcatcher habitat (Figure 10: Map 1 of 3 of the Draft EIR's Appendix D). The USFWS (Medak pers. comm. 2015) expressed that the vegetation utilized by the coastal California gnatcatcher southeast of the substation, including much of the area that would be avoided by this alternative, is some of the only remaining habitat for the gnatcatcher between the Montebello Hills and the northernmost populations in the San Gabriel and Santa Susana Mountains, and thus helps to provide connectivity between gnatcatcher populations. The USFWS stated that this connectivity is "important for maintaining a viable population within the northern range of the species" and critical for achieving resiliency in response to environmental change (Medak pers. comm. 2015). Furthermore, the six black walnut trees that would be removed as part of the proposed project could be retained under this alternative. Impacts to avian and special-status species and habitat (Impact BR-1 and Impact BR-4) would be substantially reduced under the One-Transformer-Bank Substation Alternative compared to those associated with the proposed project.

- D1-21 SCE asserts that the One-Transformer-Bank Substation Alternative would result in increases in the total truck trips because additional soil imports would be needed to the site.

As explained in response to comment D1-18, it is a reasonable assumption that more soil would need to be imported under the One-Transformer-Bank Substation Alternative when the area is excluded from the project footprint. The One-Transformer-Bank Substation Alternative would therefore increase traffic trips by about 5,000 total truck trips from Phase 1 to Phase 3. SCE states that soil can be moved within the site 10 times faster than it can be imported, so the project construction timeline would extend about 6 months longer than the proposed project due to the additional soil import. The following revision has been made to the analysis:

Page 5-13 to 5-14:

Traffic and Transportation

~~Construction of the One-Transformer-Bank Substation Alternative would result in reduced increased total vehicle trips during construction, though the maximum daily vehicle trips would most likely remain the same as under the proposed project. The reduced substation size would result in a shorter construction period and less grading, resulting in fewer soil import and export trips, The One-Transformer-Bank Substation Alternative would exclude from the disturbance area the Phase 3 area shown in Figure 2-4, which, under the proposed project was to provide some of the fill required at the substation site. Without this fill available, SCE estimates that an additional 5,000 truck trips will be needed during construction, in total, to import soil to the site. but it is assumed that daily construction activities would not change in intensity. Thus, daily vehicle trips would be about the same under this alternative compared to the proposed project. However, the reduced construction period at the substation under the One-Transformer-Bank Substation Alternative would result in a net overall substantial decrease in traffic and transportation impacts (Impact TT-1 and Impact TT-2). The increased needs for soil import would prolong the construction period by about 6~~

months, as import of soil is more time consuming than transferring soil within the project area. It is assumed that the additional time would be allocated to the 18-month-long Phase I of construction because it is when general grading would occur. An additional 5,000 trips over 24 months of Phase I construction would equate to an average of approximately 11 truck trips per day. Applying a passenger car equivalent (PCE) of 2, this equates to 22 one-way PCE trips per day for 24 months. Given that Phase I would have a maximum of 2,144 PCE daily trips for the proposed project, there would be an increase of about 1 percent in trips under the One-Transformer-Bank Substation Alternative. This would represent a slight increase in traffic impacts, which would not affect the analysis or conclusions in the Draft EIR.

All other impacts related to traffic and transportation under this alternative would be the same as those associated with the proposed project.

Page 5-9:

Transportation and Traffic	<ul style="list-style-type: none"> • Impact TT-1 (less than significant with mitigation) • Impact TT-2 (less than significant with mitigation) N/A— <u>No impact reduced by alternatives</u> 	Less (1) <u>Greater</u> (N/A)	Less (2) <u>Greater</u> (N/A)	Less (3) <u>Greater</u> (N/A)	One-Transformer-Bank Substation <u>None</u>
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For consistency with this change in the analysis, the following revisions have also been made to the EIR:

Page ES-37, Table ES-3:

- **Traffic and Transportation:** Substantially decreases total trips needed and duration of traffic impacts (Impact TT-1, Impact TT-2).

Page 3-10:

- **Biological Resources:** Gnatcatcher habitat and species impacts would be reduced since less activity would take place in gnatcatcher habitat (reduces Impacts BR-1, BR-2, and BR-4).
- ~~**Traffic and Transportation:** With less equipment to deliver to the site and less grading (soil import and export), less traffic would be generated and traffic impacts would be reduced (reduces Impacts TT-1 and TT-2).~~

Page 3-5:

One-Transformer-Bank (1600-MVA) Substation	Would meet all basic project objectives	Potentially feasible	Substantially reduces impacts to traffic, air quality, and biological resources	Passes screening; evaluated further in Chapter 5 of EIR
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D1-22 SCE's assertion that a spill of transformer oil would be limited to the oil contained in one transformer is reasonable. It is unlikely that all three transformers included in the proposed project would leak at the same time. The Draft EIR has been revised as follows to reflect the potential for a spill of hazardous oil from the transformer under the One-Transformer-Bank Substation Alternative and that a spill of transformer oil would only reasonably involve oil from one transformer:

Page 5-11:

Hazards and Hazardous Materials

Overall risk of hazards would be reduced under the One-Transformer-Bank Substation Alternative compared to the proposed projects. Under this alternative, the substation footprint would be ~~11.6~~ 14.4 acres smaller than under the proposed projects. The alternative would involve less ground disturbance, which means that slightly fewer hazardous materials overall would be used, transported, and disposed of; there would be slightly less chance of an accident (Impact HZ-1); and there would be slightly reduced potential for encountering contaminated soils (Impact HZ-2 and Impact HZ-4). Under this alternative, two groundwater wells slated to be decommissioned under the proposed project (wells OI-07C and OI-07B) would be retained; therefore, the potential for contamination of groundwater or soils via improper well abandonment (Impact HZ-2) would be slightly reduced under the One-Transformer-Bank Substation Alternative.

During operations, there would be only one transformer bank on site. The proposed project would result in an increase of 166,000 gallons of transformer oil being used on site for the 500-kV portion of the new substation, distributed among three transformer banks. Under the One-Transformer-Bank Substation Alternative, there may be more or the same amount of oil in any given transformer compared to the proposed project, depending on the manufacturer of the 1600-MVA transformer bank. Therefore, a potential spill under this alternative could release more or the same amount of oil than a potential spill involving one of the transformers under the proposed project. A spill is highly unlikely. Impacts during operation and maintenance may therefore be the same or negligibly greater than the proposed project. With only one 1600-MVA transformer, about one-third of the transformer oil (about 55,000 gallons) would be needed under this alternative than under the proposed project. Thus, there would be less oil stored on site under the One-Transformer-Bank Substation Alternative than under the proposed project, substantially reducing associated potential hazards (Impact HZ-1). On balance, the slight reduction in hazards during construction and negligibly greater or similar impacts during operation and maintenance would result in a slight overall decrease in hazards impacts under the One-Transformer-Bank Substation Alternative.

All other impacts related to hazards and hazardous materials under this alternative would be the same as those associated with the proposed projects.

The following revisions were made to the EIR for consistency with the changes made above:

Page ES-27, Table ES-3 (One-Transformer-Bank Substation Alternative and Two-Transformer-Bank Substation Alternative):

- **Hazards and Hazardous Materials:** Slightly reduces risk of contamination of groundwater or soils from groundwater well abandonment. Slightly reduces chance of an accident and of encountering contaminated soils. ~~Substantially reduces hazards associated with transformers on the substation site~~ (Impact HZ-1, Impact HZ-2, Impact HZ-4).

Page 5-17:

Hazards and Hazardous Materials

Overall risk of hazards would be reduced under the Two-Transformer-Bank Substation Alternative compared to the proposed project. Under this alternative, the substation footprint would be ~~8.3~~ 11 acres smaller than that associated with the proposed project. The alternative would involve less ground disturbance, which means that slightly fewer hazardous materials overall would be used, transported, and disposed of; there would be slightly less of a chance of an accident (Impact HZ-1); and there would be slightly reduced potential for encountering contaminated soils (Impact HZ-2 and Impact HZ-4).

During operations, there would be only two transformer banks on site. The proposed project would result in an increase of 166,000 gallons of transformer oil being used on site for the 500-kV portion of the new substation. With only two 1120-MVA transformers, about two-thirds of the transformer oil (about 110,000 gallons) would be needed under this alternative than under the proposed project. Thus, there would be less oil stored on site under the Two-Transformer-Bank Substation Alternative than under the proposed project. However, the same amount of oil would be used in each transformer, leaving the potential size of spill the same as the proposed project. Impacts (Impact HZ-1) would be similar to the proposed project, substantially reducing associated potential hazards (Impact HZ-1).

All other impacts related to hazards and hazardous materials under this alternative would be the same as those associated with the proposed project.

D1-23 As stated in CEQA Guidelines section 15126.6(a), “[t]he lead agency is responsible for selecting a range of project alternatives for examination” SCE is not responsible for selecting the range of alternatives or designing the alternatives. Alternatives considered in an EIR must be potentially feasible, avoid or substantially lessen any significant effect of the proposed project, and meet most of the basic project objectives. In this comment, SCE states it has modified the alternative by opening the tie breaker, which had been modeled as closed for the alternative. This modification therefore results in a configuration that is different than the alternative designed by the CPUC. SCE’s comments are not pertinent as to whether the CPUC-defined Two-Transformer-Bank Substation Alternative meets the CPUC’s project objectives.

SCE further states that with the tie breaker open, one of the 500/220-kV transformer banks would reach its normal rating of 1120 MVA. However, this is not a violation of reliability standards. SCE then claims that “a slight modification in the renewable generation dispatch assumption or generation capacity in the Western LA Basin would cause an overload condition” and that this alternative would not meet Objective 1. However, the CPUC believes that this alternative would meet all of the basic project objectives and “would address all violations except the violation resulting from the N-1-1 contingency involving an initial outage of the Chino–Mira Loma 220-kV No. 1 Transmission Line followed by an outage of the Chino–Mira Loma 220-kV No. 2 Transmission Line, which would result in a thermal overload on the Chino–Mira Loma 220-kV No. 3 Transmission Line.” The Draft EIR also clarifies that “[i]mplementing the RAS in addition to building the two-transformer bank substation would address the thermal overload of the Chino–Mira Loma 220-kV No. 3 Transmission Line. All violations would be addressed under this alternative, and the alternative would therefore meet Objective 1.”

The CPUC has found that the Two-Transformer-Bank Substation Alternative, as designed by CPUC, meets the requirements for alternatives under CEQA. As discussed in more detail above, the alternative would address all violations listed in EIR Appendix B, would not create additional violations, and would maintain electrical service by minimizing service interruptions during project implementation.

SCE asserts that there would be “excessive short circuit duty values on the switchrack”; however, this statement is unsupported by evidence (e.g., a short circuit duty value, threshold where values become excessive). Furthermore, it is possible that a fault reduction scheme may be needed. Methods could include opening a high-speed circuit breaker on the transformer or bus tie before opening a 220-kV line position for a fault on one of the 220-kV lines. Once the fault is cleared, the transformer or tie breaker could be automatically reclosed.

D1-24 Refer to response to comment D1-13, which explains the relation of the OTC compliance date to the CPUC’s CEQA project objectives. Although it is reasonable to assume that SCE will need a redesign for the Two-Transformer-Bank Substation Alternative and implementing such an alternative would take longer than implementing the proposed project, SCE’s claims are not evidence that the Two-Transformer-Bank Substation Alternative does not meet Project Objective 1.

D1-25 As described in response to comment D1-11, establishing project objectives is within the discretion of the Lead Agency.

The CPUC’s consideration of SCE’s objectives is discussed in Section 1.2.2.2, “Consideration of SCE’s Objectives.” Whether the Two-Transformer-Bank Substation Alternative meets SCE’s objectives is irrelevant to whether the alternative meets most of the basic *CPUC objectives* and can, therefore, be brought forward for further analysis in the EIR.

SCE asserts that the Draft EIR incorrectly states that “[i]n the event that one transformer bank failed, the other transformer bank would automatically go out of

service. If both transformers were taken out of service due to failure of one transformer bank, there would not be an outage. Instead, the grid would operate as if the substation was not in place.” However, the Draft EIR is correct because in the case that both 500/220-kV transformers were out of service, the 220-kV lines connected to the 220/66-kV transformers and 66/16-kV transformers would continue to serve load as if the current 220/66/16-kV substation were in service.

SCE also asserts that if the grid operated as if the substation were not in place, violations of NERC TPL-001-4 would occur. However, their assertions involve contingencies with three outages. Study of a third outage in a contingency scenario is not required under NERC TPL-001-4. SCE inaccurately compares a scenario involving outages of the transformers at the Two-Transformer Bank Substation Alternative to the No Project Alternative. The No Project Alternative represents an N-0 (no outages) contingency. In the case of the No Project Alternative, two additional outages would result in an N-1-1 or N-2 contingency, which must be studied under NERC, WECC, and CAISO standards. These contingencies would result in violations of reliability standards under the No Project Alternative, as explained in the EIR.

In contrast to the No Project Alternative, an outage of both transformers at the Two-Transformer-Bank Substation Alternative would be representative of an N-1-1 or N-2 contingency. An additional, unrelated outage somewhere else in the system would be representative of an N-1-1-1 or an N-3 contingency. There is no requirement to study the results of an N-1-1-1 or N-3 scenario for transmission planning under NERC, WECC, or CAISO standards. Therefore, any ill effects of an N-1-1-1 or N-3 contingency are not considered violations of reliability standards and would not impact whether this alternative meets Objective 2.

In the case of an N-1-1 or N-2 contingency involving the two transformers at the Two-Transformer-Bank Substation Alternative, the grid would operate as it would in “base case” contingency without the Mesa Substation, as shown in rows 84, 85, and 86 of Appendix B of the EIR. In these three scenarios, without the Mesa Substation, voltage levels would be above the minimum emergency voltage of 0.90 per unit allowed per Table 1 of the CAISO Planning Standards (CAISO 2015). Therefore, there would be no violations or outages and no impacts related to whether this alternative satisfies Objective 2 would occur.

D1-26 SCE’s comment references its comments regarding the One-Transformer-Bank Substation Alternative and states that their comments similarly apply to the Two-Transformer-Bank Substation Alternative, but that the potential reduction of impacts is less under the Two-Transformer-Bank Substation Alternative. Therefore, each area addressed for the One-Transformer-Bank Substation Alternative is also addressed for this comment.

SCE asserts that the Two-Transformer-Bank Substation Alternative would result in increases in the total exhaust emissions because additional soil imports would be needed on site. The area excluded from the disturbance area under the Two-Transformer-Bank Substation Alternative was to be used for fill material for other parts of the substation site. SCE claims that, without the soil from this area, additional soil would have to be imported, increasing the number of truck trips needed for Phase

1 and Phase 3. Given SCE's claims that 5,000 additional total trips would occur under the One-Transformer-Bank Substation Alternative, which disturbs 11.6 acres less in the Phase 3 area than the proposed project, it is presumed that the Two-Transformer-Bank Substation Alternative would require an additional 3,575 trips because it would disturb 8.3 acres less in the Phase 3 area than the proposed project. SCE claims that the One-Transformer Bank Substation Alternative would result in a 6-month longer timeframe than the proposed project; therefore, the Two-Transformer Bank Substation Alternative would result in about a 4.5-month longer construction timeline than the proposed project due to the additional soil import.

The area in Phase 3 as shown on Figure 2-7 is topographically higher, making it a reasonable assumption that more soil would need to be imported under the Two-Transformer-Bank Substation Alternative when the area is excluded from the project footprint. The Two-Transformer-Bank Substation Alternative would slightly increase total exhaust emissions but would still substantially decrease fugitive dust created when compared to the proposed project. On balance, there would be a moderate reduction in air quality impacts. Thus, the Two-Transformer Bank Substation remains ranked as second in environmental superiority for Air Quality. The following revision has been made to the analysis to reflect this and to update acreages changes based on revised GIS submitted by the applicant:

Page ES-27 Table ES-3:

- **Air Quality:** Substantially reduces ~~total exhaust emissions as well as~~ fugitive dust emissions from ground disturbance (Impact AQ-2, Impact AQ-3).

Page 5-15:

Air Quality

Construction of the Two-Transformer-Bank Substation Alternative would result in ~~total reduced~~ increased air quality ~~exhaust emissions~~ impacts over the construction period, ~~but reduced fugitive dust emissions, though the maximum daily emissions during construction would remain the same as under the proposed project.~~ While the reduced substation size would require result in less import of materials for building the substation itself, a shorter construction period and less ground disturbance, but construction of the Two-Transformer- Bank Substation Alternative would also exclude from the disturbance area much of the Phase 3 area shown in Figure 2-4. Under the proposed project, this area was to provide some of the fill required at the substation site. Without this fill available, an estimated additional 3,575 truck trips would be needed, in total, to import soil to the site. The additional total trips would increase overall exhaust emissions, and would slightly increase the maximum number of trips per day when compared to the proposed project, it is assumed that daily construction activities would not change in intensity. It is assumed that soil import would be needed during Phase I, since that is when grading would take place, which would be approximately 18 months long for the proposed project. With an additional 4.5 months needed for soil transport, Phase I would be 22.5 months long. An additional 3,575 trips over an additional 4.5 months of construction equates to an average of approximately 8 truck trips per day, or 16 PCE trips, on each day of construction. Given that Phase I would have a

maximum of 2,144 PCE daily trips, an increase in trips and exhaust emissions of less than 1 percent would result in a negligible increase in maximum daily exhaust emissions. Thus, daily maximum criteria pollutant emissions would be about the same negligibly increased under the Two-Transformer-Bank Substation Alternative compared to the proposed project. ~~However, the reduced construction period at the substation would result in a net overall substantial decrease in total exhaust emissions (Impact AQ-2 and Impact AQ-3).~~ The reduced disturbance area (about 11 acres less than the proposed project) would substantially reduce fugitive dust emissions from ground disturbance (Impact AQ-2 and Impact AQ-3). Overall, there would be a slight reduction in air quality impacts.

Page 5-16:

Greenhouse Gas Emissions

Overall greenhouse gas emissions from construction of the Two-Transformer-Bank Substation Alternative would be ~~reduced compared to~~ greater than the proposed project. The smaller substation footprint would require additional soil import due to the reduced availability of on-site soil, as described under Air Quality, which would require more translate into less grading and therefore less heavy equipment use and fewer truck trips to import and export soil. Less grading would be required on site, which would reduce heavy equipment on site. On balance, impacts would be similar to those of the proposed project, resulting in slightly reduced greenhouse gas emissions (Impact GHG-1) during construction.

All other construction impacts related to greenhouse gases under this alternative would be the same as those associated with the proposed project. Operations-related greenhouse gas emissions would be the same as under the proposed projects, since operations and maintenance activities would be about the same as those performed for the proposed project.

Page 5-7:

Greenhouse Gas Emissions	<ul style="list-style-type: none"> Impact GHG-1 (less than significant) N/A—No impact reduced by alternatives 	Less (1) Similar (N/A)	Less (1) Similar (N/A)	Greater (3N/A)	One-Transformer-Bank Substation None
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Page 5-18:

Population and Housing

It is presumed that the same maximum number of employees would be needed during construction of this alternative as the proposed project. The duration of need for workers would, however, be ~~shorter~~ about 4.5 months longer than for the proposed project, as discussed under Air Quality. This could result in a negligible ~~reduction of~~ increase in the potential for temporary population growth in the area, compared to the proposed project, should construction workers relocate to the area. The impacts of this alternative and the proposed project would be

substantially the same.

All other impacts related to population and housing would be the same as those associated with the proposed project.

Page 5-18:

Public Services and Utilities

The Two-Transformer-Bank Substation Alternative would have a negligibly increased ~~reduced~~ potential for need for public services due to hazardous materials spills, fire, theft, and vandalism, as well as lower production of wastewater and storm water as a function of the longer ~~shorter~~ construction period at the substation site, as discussed previously under Air Quality, ~~and the reduced construction activity and substation footprint compared to the proposed project.~~ Impacts would be substantially the same as the proposed project.

The smaller disturbance area associated with the Two-Transformer-Bank Substation Alternative would require less water for dust control during construction than the proposed project. This alternative would reduce ground disturbance by about ~~12~~ 15 percent, which may also reduce water use for dust control (Impact PSU-5) at the substation by ~~12~~ 15 percent.

All other impacts related to public services and utilities would be the same as those associated with the proposed project.

Page 5-19:

Recreation

It is presumed that the same maximum number of employees would be needed during construction of this alternative as for the proposed project. The duration of need for workers would, however, be slightly longer ~~shorter~~ than for the proposed project, as previously discussed under Air Quality, resulting in a small potential increase ~~decrease~~ in the time that workers may need to relocate to the area. Thus, any increased use in recreational facilities due to temporary relocation of construction workers to the area could be negligibly increased ~~reduced~~ under the Two-Transformer-Bank Substation Alternative compared to the proposed project. The impacts of this alternative and the proposed project would be substantially the same.

All other impacts related to recreation under this alternative would be the same as those associated with the proposed project.

Page 3-5:

Two-Transformer-Bank (1120-MVA) Substation	Would meet all basic project objectives	Potentially feasible	Substantially reduces impacts to traffic, air quality, and biological resources	Passes screening; evaluated further in Chapter 5 of EIR
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Page 3-13:

Potential to Substantially Reduce or Avoid Significant Impacts

This alternative would substantially reduce the following several significant impacts, including:

- ~~**Air Quality:** Criteria pollutant emissions during construction would be reduced since less ground disturbance and less grading would be required to accommodate the smaller substation footprint (reduces Impacts AQ-2, AQ-3, and AQ-4).~~
- **Biological Resources:** Gnatcatcher habitat and species impacts would be reduced since less activity would take place in gnatcatcher habitat (reduces Impacts BR-1, BR-2, and BR-4).

SCE disagrees with the comparative analysis of biological resources impacts. However, compared with the proposed project, the Two-Transformer-Bank Substation Alternative would avoid impacts to approximately 8.3 acres of habitat, much of which has been identified as important coastal California gnatcatcher habitat by the USFWS (Medak pers. comm. 2015; see p. 4.3-4 of the Draft EIR “Agency Consultation”). Figure 5: Map 1 of 5 of the Draft EIR’s Appendix D shows multiple observations of coastal California gnatcatcher as well as observations of yellow warbler, loggerhead shrike, and peregrine falcon, all special-status species, within the approximately 8.3 acres southeast of the existing substation that would be avoided by the Two-Transformer-Bank Substation Alternative (see response to comment D1-20 for additional details about the classification of gnatcatcher habitat in the EIR). The EIR’s conclusion that the Two-Transformer-Bank Alternative would substantially reduce biological resources impacts when compared to the proposed project is therefore supported by substantial evidence and expert analysis. The EIR has been modified to include additional details about the importance of this habitat:

Pages 5-15 through 5-16:

Construction of the Two-Transformer-Bank Substation Alternative would result in reduced impacts on biological resources compared to the proposed project. ~~California~~ Coastal California gnatcatcher, least Bell’s vireo, loggerhead shrike, peregrine falcon, Swainson’s hawk, and yellow warbler have been sighted in the areas southeast and east of the current substation; ~~California~~ coastal California gnatcatcher is known to forage and nest in the area southeast of the current substation. Under the Two-Transformer-Bank Substation Alternative, approximately 8.3 acres of habitat southeast of the existing substation would be avoided compared to the proposed project. ~~This habitat is higher-value habitat on the substation site because special~~ Special-status bird species (including nesting/foraging coastal California ~~coastal~~ gnatcatcher) are known to occur have been documented within the approximately 8.3 acres that would be avoided within this habitat (Figure 5: Map 1 of 5, Appendix D of the Draft EIR).

Approximately 6.5 acres of the 8.3 acres that would be avoided under the Two-Transformer-Bank Substation Alternative has been identified as coastal California

gnatcatcher habitat. Figure 5: Map 1 of 5 of the Draft EIR's Appendix D shows numerous occurrences of coastal California gnatcatcher within the avoided area, and Figure 10: Map 1 of 3 of the Draft EIR's Appendix D classifies approximately 6.5 acres that would be avoided as gnatcatcher habitat. The area that would be avoided is classified primarily as non-native vegetation (Figure 4.3-1 of the Draft EIR); however, both native and non-native vegetation in the Mesa Substation area are considered gnatcatcher habitat (Figure 10: Map 1 of 3 of the Draft EIR's Appendix D). The USFWS (Medak pers. comm. 2015) expressed that the vegetation utilized by the coastal California gnatcatcher southeast of the substation, including much of the area that would be avoided by this alternative, is some of the only remaining habitat for the gnatcatcher between the Montebello Hills and the northernmost populations in the San Gabriel and Santa Susana Mountains, and thus helps to provide connectivity between gnatcatcher populations. The USFWS stated that this connectivity is "important for maintaining a viable population within the northern range of the species" and critical for achieving resiliency in response to environmental change (Medak pers. comm. 2015). Furthermore, the six black walnut trees that would be removed as part of the proposed project could be retained under this alternative. Impacts on avian and special-status species and habitat (Impact BR-1 and Impact BR-4) would be substantially reduced under the Two-Transformer-Bank Substation Alternative compared to the proposed project.

SCE asserts that the Two-Transformer-Bank Substation Alternative would result in increases in the total truck trips because additional soil imports would be needed to the site. As explained previously in this response, it is a reasonable assumption that more soil would need to be imported under the Two-Transformer-Bank Substation Alternative when the area is excluded from the project footprint. The Two-Transformer-Bank Substation Alternative would therefore increase traffic trips by about 3,575 total truck trips from Phase 1 to Phase 3. SCE claims that soil can be moved within the site 10 times faster than it can be imported, so the project construction timeline would extend about 4.5 months longer than the proposed project. The following revision has been made to the analysis:

Page ES-27, Table ES-3:

- ~~**Traffic and Transportation:** Substantially decreases total trips needed and duration of traffic impacts (Impact TT-1, Impact TT-2).~~

Page 5-19:

Transportation and Traffic

Construction of the Two-Transformer-Bank Substation Alternative would result in increased total reduced vehicle trips during construction, though the maximum daily vehicle trips would most likely remain the same as for the proposed project. The reduced substation size would result in a shorter construction period and less grading, resulting in fewer soil import and export trips. The Two-Transformer Bank Substation Alternative would exclude from the disturbance area much of the Phase 3 area shown in Figure 2-4, which, under the proposed project, was to provide some of the fill required at the substation site. Without this fill available, it is estimated that an additional 3,575 truck trips would be needed

during construction, in total, to import soil to the site. but it is assumed that daily construction activities would not change in intensity. Thus, daily vehicle trips would be about the same under this alternative compared to the proposed project. However, the reduced construction period at the substation under the Two-Transformer Bank Substation Alternative would result in an overall substantial decrease in traffic impacts (Impact TT-1 and Impact TT-2). The increased need for soil import would prolong the construction period by about 4.5 months, as import of soil is more time consuming than transferring soil within the project area. It is assumed that the additional time would be allocated to the 18-month long Phase I of construction because that is when general grading of the site would take place. An additional 3,575 trips over an additional 4.5 months of construction of Phase I equates to an average of approximately 8 truck trips per day. Applying a passenger car equivalent (PCE) of 2, this equates to 16 one-way PCE trips per day for 4.5 months. Given that Phase I would have a maximum of 2,144 PCE daily trips, an increase in trips of less than 1 percent would result in a negligible increase in maximum daily trips.

All other impacts related to traffic and transportation under this alternative would be the same as those associated with the proposed project.

Page 5-9:

Transportation and Traffic	<ul style="list-style-type: none"> • Impact TT-1 (less than significant with mitigation) • Impact TT-2 (less than significant with mitigation) <u>N/A—No impact reduced by alternatives</u> 	Less (1) <u>Greater (N/A)</u>	Less (2) <u>Greater (N/A)</u>	Less (3) <u>Greater (N/A)</u>	One-Transformer-Bank Substation <u>None</u>
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Page 3-5:

Two-Transformer-Bank (1120-MVA) Substation	Would meet all basic project objectives	Potentially feasible	Substantially reduces impacts to traffic, air quality, and biological resources	Passes screening; evaluated further in Chapter 5 of EIR
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Page 3-13:

- **Biological Resources:** Gnatcatcher habitat and species impacts would be reduced since less activity would take place in gnatcatcher habitat (reduces Impacts BR-1, BR-2, and BR-4).
- **Traffic and Transportation:** ~~With less equipment to deliver to the site and less grading (soil import and export), less traffic would be generated and traffic impacts would be reduced (reduces Impacts TT-1 and TT-2).~~

SCE also asserts that the conclusion that the Two-Transformer Alternative is not environmentally superior because of incorrect conclusions about truck trips, air

quality impacts, and biological resources impacts. Revisions to analyses for those resources are addressed within this response. Revisions have been made to the environmentally superior alternative analysis in Section 5.4, "Environmentally Superior Alternative," to reflect the changes to the resource analyses, as shown in response to comment D1-18.

SCE notes that the extension of the project duration by more than 4.5 months could compromise the ability to complete the project by December 2020. As described in detail in response to comment D1-13, implementing the project by December 2020 is not an objective of the project.

D1-27 It is reasonable to assume that SCE has not been designing a GIS substation and it would take a longer amount of time to implement a GIS Substation Alternative than to implement the proposed project. The environmental impacts from this alternative have been adequately examined in Chapter 5 of the Draft EIR. Please also refer to response to comment D1-13, which explains the relation of the OTC compliance date to the CPUC's CEQA project objectives. The CPUC will consider the CAISO's comments regarding the Gas Insulated Substation Alternative when making their final decision on the proposed Project and the feasibility of alternatives.

D1-28 SCE's comment references its comments regarding the One-Transformer-Bank Substation Alternative and states that their comments similarly apply to the Gas-Insulated Substation Alternative, but that it provides less potential to reduce impacts. Therefore, each area addressed for the One-Transformer-Bank Substation Alternative is also addressed for this comment.

SCE asserts that the Gas-Insulated Substation Alternative would result in increases in the total exhaust emissions because additional soil imports would be needed on site. The area excluded from the disturbance area under the Gas-Insulated Substation Alternative was to be used for fill material for other parts of the substation site. SCE claims that, without the soil from this area, additional soil would have to be imported, increasing the number of truck trips needed for Phase 1 and Phase 3. Given that SCE claims that 5,000 additional total trips would occur under the One-Transformer-Bank Substation Alternative, which disturbs 11.6 acres less in the Phase 3 area than the proposed project, it is presumed that the Gas-Insulated Substation Alternative would require an additional 3,150 trips because it would disturb 7.3 acres less in the Phase 3 area than the proposed project. SCE claims that the Gas-Insulated Substation Alternative would result in a 6-month longer timeframe than the proposed project; therefore, the Gas-Insulated Substation Alternative would result in about a 4-month longer construction timeline than the proposed project due to the additional soil import.

The area in Phase 3 as shown on Figure 2-7 is topographically higher, making it a reasonable assumption that more soil would need to be imported under the Gas-Insulated Substation Alternative when part of the Phase 3 area is excluded from the project footprint. The Gas-Insulated Substation Alternative would slightly increase total exhaust emissions but would substantially decrease fugitive dust created when compared to the proposed project. On balance, there would be a slight reduction in air quality impacts. Thus, the Gas Insulated Substation Alternative remains ranked as third

in environmental superiority for Air Quality. The following revision has been made to the analysis to reflect this information and to update acreage changes based on revised GIS submitted by the project applicant:

Page ES-38, Table ES-3:

- **Air Quality:** Substantially reduces ~~total exhaust emissions as well as~~ fugitive dust emissions from ground disturbance (Impact AQ-2, Impact AQ-3).

Page 5-20:

Air Quality

Construction of the Gas-Insulated Substation Alternative would result in ~~reduced~~ total increased air quality exhaust emissions impacts over the construction period, but reduced fugitive dust emissions, though the maximum daily emissions during construction would remain the same as for the proposed project. While the reduced substation size would require result in less import of materials for building the substation itself, a shorter construction period and less ground disturbance, but construction of the Gas-Insulated Substation Alternative would exclude from the disturbance area much of the Phase 3 area shown in Figure 2-4. Under the proposed project, this area was to provide some of the fill required at the substation site. Without this fill available, an additional 3,150 truck trips would be needed, in total, to import soil to the site. The additional trips would increase overall exhaust emissions, and would increase the maximum number of trips per day when compared to the proposed project. it is assumed that daily construction activities would not change in intensity. It is assumed that soil import would be needed during Phase I, when general grading would occur, which would be about 18 months long for the proposed project. With an additional 4 months needed for soil transport, Phase I would be 22 months long. An additional 3,150 trips over an additional 4 months of construction equates to an average of approximately 7 truck trips per day, or 14 PCE trips, on each day of construction. Given that Phase I would have a maximum of 2,144 PCE daily trips, an increase in trips and exhaust emissions of less than 1 percent would result in a negligible increase in maximum daily exhaust emissions. Thus, maximum daily criteria pollutant emissions would be negligibly higher under the Gas-Insulated Substation Alternative as for the proposed project. However, the reduced construction period at the substation would result in a net overall substantial decrease in exhaust emissions (Impact AQ-2 and Impact AQ-3). The reduced disturbance area (about ~~7.3~~ 10 acres less than the proposed project) would substantially reduce fugitive dust emissions from ground disturbance (Impact AQ-2 and Impact AQ-3). Overall, there would be a moderate reduction in air quality impacts.

All other impacts related to air quality under this alternative would be the same as those associated with the proposed project.

Page 5-22:

Greenhouse Gas Emissions

The Gas-Insulated Substation Alternative would ~~reduce~~ be greater than the greenhouse gas emissions from construction compared to the proposed project. Less grading and heavy equipment use would be required on site, which would reduce heavy equipment use on site. However, the ~~The~~ smaller substation footprint would require additional soil import due to the reduced availability of on-site soil, as described under Air Quality, which would require more ~~translate into less~~ grading and therefore less heavy equipment use and fewer truck trips to import and export soil. ~~resulting in~~ On balance, impacts would be similar to those of the proposed project, slightly reduced greenhouse gas emissions (Impact GHG-1) during construction. All other construction impacts related to greenhouse gases under this alternative would be the same as those associated with the proposed project.

Page 5-24:

Population and Housing

It is presumed that the same maximum number of employees would be needed during construction of this alternative as for the proposed project. The duration of need for workers would, however, be ~~shorter~~ about 4 months longer than for the proposed project, as discussed under Air Quality. This could result in a negligible ~~reduction of~~ increase in the potential for temporary population growth in the area, compared to the proposed project, should construction workers relocate to the area. The impacts of this alternative and those of the proposed project would be substantially the same.

Page 5-24:

Public Services and Utilities

The Gas-Insulated Substation Alternative would have a negligibly increased ~~reduced~~ potential for the need for public services due to hazardous materials spills, fire, theft, and vandalism, as well as lower production of wastewater and storm water as a function of the longer ~~shorter~~ construction period at the substation site, as discussed previously under Air Quality, and the reduced construction activity and substation footprint compared to the proposed project. Impacts would be substantially the same as the proposed project.

The smaller disturbance area associated with the Gas-Insulated Substation Alternative would require less water for dust control during construction than the proposed project. This alternative would reduce ground disturbance by about ~~11~~ 14 percent, which may also reduce water use for dust construction at the substation by ~~11~~ 14 percent.

All other impacts related to public services and utilities would be the same as for the proposed project.

Page 5-24:

Recreation

It is presumed the same maximum number of employees would be need during construction of this alternative as for the proposed project. The duration of need for workers would, however, be slightly ~~longer~~ shorter than for the proposed project, resulting in a small potential ~~increase~~ decrease in the time that workers may need to relocate to the area. Thus, any increased use in recreational facilities due to temporary relocation of construction workers to the area could be negligibly ~~increased~~ reduced under the Gas-Insulated Substation Alternative compared to the proposed project. The impacts of this alternative and those of the proposed project would be substantially the same.

Page 3-5

Gas-Insulated Substation	Would meet all basic project objectives	Potentially feasible	Substantially reduces impacts to traffic, air quality, and biological resources	Passes screening; evaluated further in Chapter 5 of EIR
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Page 3-14:

As a result of the decreased ground disturbance, this alternative would substantially reduce the following significant impacts of the proposed project:

- ~~**Air Quality:** Less grading would be required, reducing heavy equipment emissions. Fewer truck trips for soil import and export, equipment delivery, and materials delivery would reduce exhaust emissions (reduces Impacts AQ-2, AQ-3, and AQ-4).~~
- **Biological Resources:** Gnatcatcher habitat and species impacts would be reduced since less activity would take place in gnatcatcher habitat due to the size reduction of the 500-kV switchrack (reduces Impacts BR-1, BR-2, and BR-4).

SCE disagrees with the comparative analysis of biological resources impacts. However, compared with the proposed project, the Gas-Insulated Substation Alternative would avoid impacts to approximately 7.3 acres of habitat southeast of the existing substation, much of which has been identified as important coastal California gnatcatcher habitat by the USFWS (Medak pers. comm. 2015; see p. 4.3-4 of the Draft EIR “Agency Consultation”). Figure 5: Map 1 of 5 of the Draft EIR’s Appendix D shows one nest and multiple observations of coastal California gnatcatcher as well as observations of yellow warbler, loggerhead shrike, and peregrine falcon, all special-status species, within the 7.3 acres that would be avoided by the Gas-Insulated Substation Alternative (see response to comment D1-20 for additional details about the classification of gnatcatcher habitat in the EIR). The EIR’s conclusion that the Gas-Insulated Substation Alternative would substantially reduce biological resources impacts when compared to the proposed project is therefore supported by facts and

expert analysis.

The EIR has been modified to include additional details about the importance of this habitat:

Pages 5-20 through 5-21:

Construction of the Gas-Insulated Substation Alternative would result in reduced impacts on biological resources compared to the proposed project. The reduced substation footprint would avoid biological resources that the proposed project would impact. ~~California~~ Coastal California gnatcatcher, least Bell's vireo, loggerhead shrike, peregrine falcon, Swainson's hawk, and yellow warbler have been sighted in the areas southeast and east of the current substation; ~~California~~ coastal California gnatcatcher is known to forage and nest in the area southeast of the current substation. Under the Gas-Insulated Substation Alternative, about 7.3 ~~fewer~~ acres of habitat southeast of the existing substation would be avoided compared to the proposed project. ~~This habitat is also part of the higher-value habitat on the substation site because many of special~~ Special-status bird species (including nesting and foraging coastal California ~~coastal~~ gnatcatcher) are known to occur within this habitat ~~have been documented within the approximately 7.3 acres (Figure 5: Map 1 of 5, Appendix D of the Draft EIR).~~

Approximately 4.2 acres of the 7.3 acres that would be avoided under the Gas-Insulated Substation Alternative has been identified as coastal California gnatcatcher habitat. Figure 5: Map 1 of 5 of the Draft EIR's Appendix D shows numerous occurrences of coastal California gnatcatcher within the area avoided, and Figure 10: Map 1 of 3 of the Draft EIR's Appendix D classifies approximately 4.2 acres that would be avoided as gnatcatcher habitat. The area that would be avoided is classified primarily as non-native vegetation (Figure 4.3-1 of the Draft EIR); however, both native and non-native vegetation in the Mesa Substation area are considered gnatcatcher habitat (Figure 10: Map 1 of 3 of the Draft EIR's Appendix D). The USFWS (Medak pers. comm. 2015) expressed that the vegetation utilized by the coastal California gnatcatcher southeast of the substation, including much of the area that would be avoided, is some of the only remaining habitat for the gnatcatcher between the Montebello Hills and the northernmost populations in the San Gabriel and Santa Susana Mountains, and thus helps to provide connectivity between gnatcatcher populations. The USFWS stated that this connectivity is "important for maintaining a viable population within the northern range of the species" and critical for achieving resiliency in response to environmental change (Medak pers. comm. 2015). Furthermore, three of the six black walnut trees on the substation site that would be removed as part of the proposed project could likely be retained under this alternative. Impacts to avian and special-status species and habitat (Impact BR-1 and Impact BR-4) would be substantially reduced under the Gas-Insulated Substation Alternative compared to the proposed project.

SCE asserts that the Two-Transformer-Bank Substation Alternative would result in increases in the total truck trips because additional soil imports would be needed to the site. As explained previously in this response, it is a reasonable assumption that

more soil would need to be imported under the Gas-Insulated Substation Alternative when the area is excluded from the project footprint. The Gas-Insulated Substation Alternative would therefore increase traffic trips by about 3,150 total truck trips from Phase 1 to Phase 3. SCE claims that soil can be moved within the site 10 times faster than it can be imported, so the project construction timeline would extend about 4 months longer than the proposed project. The following revision has been made to the analysis:

Page ES-28, Table ES-3:

- **Traffic and Transportation:** Substantially decreases total trips needed and duration of traffic impacts (Impact TT-1, Impact TT-2).

Page 5-25:

Transportation and Traffic

Construction of the Gas-Insulated Substation Alternative would result in total ~~increased~~ reduced vehicle trips, though the maximum daily vehicle trips would remain approximately the same as under the proposed project. ~~The reduced substation size would result in a shorter construction period and less grading resulting in fewer soil import and export trips.~~ The Gas-Insulated Substation Alternative would exclude from the disturbance area much of the Phase 3 area shown in Figure 2-4, which, under the proposed project, was to provide some of the fill required at the substation site. Without this fill available, it is estimated that an additional 3,150 truck trips would be needed during construction, in total, to import soil to the site, but it is assumed that daily construction activities would not change in intensity. Thus, daily vehicle trips would be about the same under this alternative compared to the proposed project. However, the reduced construction period at the substation under the Gas-Insulated Substation Alternative would result in an overall substantial decrease in total traffic and transportation impacts (Impact TT-1 and Impact TT-2). An additional 3,150 trips over an additional 4 months of construction during Phase 1 equates to an average of approximately 7 truck trips per day. Applying a passenger car equivalent (PCE) of 2, this equates to 14 one-way PCE trips per day, on each day of construction. Given that Phase I would have a maximum of 2,144 PCE daily trips, an increase in trips and exhaust emissions of less than 1 percent would result in a negligible increase in maximum daily trips. The increase in trips associated with the Gas-Insulated Substation Alternative would slightly increase a significant impact of the proposed project, but the impact would be mitigated to less than significant with the same mitigation measures proposed to be implemented for the proposed project.

Page 5-9:

Transportation and Traffic	<ul style="list-style-type: none"> • Impact TT-1 (less than significant with mitigation) • Impact TT-2 (less than significant with mitigation) <u>N/A— No impact reduced by alternatives</u> 	Less (1) <u>Greater (N/A)</u>	Less (2) <u>Greater (N/A)</u>	Less (3) <u>Greater (N/A)</u>	One-Transformer-Bank Substation <u>None</u>
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Page 3-5

Gas-Insulated Substation	Would meet all basic project objectives	Potentially feasible	Substantially reduces impacts to traffic, air quality, and biological resources	Passes screening; evaluated further in Chapter 5 of EIR
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Page 3-14:

- **Biological Resources:** Gnatcatcher habitat and species impacts would be reduced since less activity would take place in gnatcatcher habitat due to the size reduction of the 500-kV switchrack (reduces Impacts BR-1, BR-2, and BR-4).
- ~~**Traffic and Transportation:** Less grading would be required and less equipment, soil, and materials would need to be brought to the site, reducing truck trips (reduces Impacts TT-1 and TT-2)~~

SCE notes that the extension of the project duration by more than 4 months could compromise the ability to complete the project by December 2020. As described in detail in response to comment D1- 13, implementing the project by December 2020 is not an objective of the project.

D1-29 SCE’s assertion that the proposed project is not within any dam inundation area as shown on the City of Monterey Park’s General Plan Figure SCS-4: Flood Inundation Areas: Garvey Reservoir and Laguna Basin is correct. The following corrections have been made to Section 4.8, “Hydrology and Water Quality,” of the Draft EIR to reflect this information.

Page 4.8-6:

Portions of the City of Monterey Park lie within the inundation area for the Garvey Reservoir; however, the Mesa Substation site is not within this area (City of Monterey Park 2001). ~~The Mesa Substation site is in an inundation area for the Garvey Reservoir if the south dam fails. If the reservoir’s south dam were to fail, flood depths would be 6 to 7 feet. From there, water would come up against State Route 604 and then eventually flow through freeway undercrossings (City of Monterey Park 2001). Staging Yard 5 and structure replacement in the City of Commerce are also in the Garvey Reservoir inundation zone, but farther from the~~

reservoir itself. Floodwaters would reach the City within 15 minutes (City of Commerce 2008).

Page 4.8-26:

~~The Mesa Substation site, transmission lines, subtransmission lines, nearby telecommunications lines, and Staging Yards 1, 2 and 3 would be located within the inundation area of the Garvey Reservoir should the south dam fail. A failure of the Garvey Reservoir south dam is unlikely during construction. Although the proposed project would not exacerbate the existing flood conditions, a dam failure when workers are present, however, could result in significant impacts due to the close proximity of the dam. MM HY-5 would be implemented to require training on an evacuation route in the event of a dam failure. Impacts would be less than significant after mitigation.~~

Page 4.8-27:

However, if the Garvey Reservoir south dam fails, it would take about 15 ~~minutes~~hours for flood waters to cover the work area. The flood waters would have traveled through State Route 60 underpasses, which should slow the water.

Page 4.8-27:

~~The Mesa Substation and nearby telecommunications, transmission, subtransmission, and distribution infrastructure would be located in the inundation area of the Garvey Reservoir. The total number of telecommunications, transmission, subtransmission, and distribution structures in the inundation zone would be reduced as a result of the proposed project. Thus, there would be no adverse impact related to structures in a dam inundation area with regards to transmission, subtransmission, and distribution structures. A dam failure is a very low probability event, given that repairs were conducted in 1999, and the proposed project would not exacerbate the existing conditions. However, impacts to the substation in the event of a dam failure could be catastrophic, including potentially widespread outages and severe damage to substation equipment. This would be a significant impact. MM HY-6 would be implemented to reduce dam inundation impacts. Impacts would be less than significant with mitigation.~~

Page 4.8-30:

~~**MM HY-6: Dam Inundation Substation Protection.** SCE shall incorporate dam inundation measures into its substation at the design phase to reduce the potential for widespread outages and equipment damages in the event of failure of the south dam at Garvey Reservoir. Measures could include:~~

- ~~• Concrete perimeter wall and flood gates at entry ways;~~
- ~~• Elevation of key substation equipment above inundation levels; or~~
- ~~• Sealing of equipment buildings.~~

- D1-30 See Response to comment D2-181.
- D1-31 This comment summarizes comment D1. Refer to responses to comments D1-18, D1-20, D1-21, D1-22, D1-26, and D1-28 regarding the comparison of alternatives analysis and to response to comment D1-18 regarding the environmentally superior alternative. Refer to responses to comments D1-11, D1-12, D1-13, D1-14, D1-16, and D1-18, which speak to the feasibility of the One-Transformer-Bank Substation Alternative. Responses to comments D1-11, D1-12, D-13, D1-14, D1-16, D1-24, D1-25, and D1-27 address how the three considered alternatives meet most of CPUC project objectives, and that meeting SCE's objectives from the PEA is not a requirement for alternatives under CEQA. All three alternatives substantially reduce a significant effect of the proposed project, as required under CEQA for alternatives, as explained in response to comment D1-17. Refer to responses to comments D1-29 and D1-30 regarding feasibility of mitigation measures.

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

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

D2-1

D2-2

D2-3

Mesa 500 kV Substation Project

DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language
		unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center.”	resources specialist/qualified archeologist and <u>SCE</u> determines that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist and <u>SCE</u> shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center.”
Table ES-2 Mitigation Measure column	ES-13	First bullet of MM CR-3 states: “Determination if a resource is an historical resource. The CPUC-approved cultural resources specialist/qualified archaeologist, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historic resource, the qualified archaeologist shall prepare an Evaluation Plan.”	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: “Determination if a resource is an historical resource. The CPUC-approved cultural resources specialist/qualified archaeologist and <u>SCE</u> , in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a <u>historical</u> resource, the qualified archaeologist and <u>SCE</u> shall prepare an Evaluation Plan.”
Table ES-2 Mitigation Measure column	ES-13	Second bullet of MM CR-3 states: “Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the historic resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan shall describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an historic resource. If the discovery is not found to be an historic resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an historic resource, SCE shall prepare a Data Recovery Plan.”	Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age SCE recommends the following edits: “Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the <u>historical</u> resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan shall describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an <u>historical</u> resource. If the discovery is not found to be an <u>historical</u> resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an <u>historical</u> resource, SCE shall prepare a Data Recovery Plan.”
Table ES-2 Mitigation	ES-13	Third bullet of MM CR-3 states: “Data Recovery Plan. Data Recovery Plans for historic resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section	Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age

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D2-4

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Section	Page	DEIR Language	SCE Recommended Language
n Measure column		21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods, samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it an historic resource, and reporting procedure. This plan shall be submitted to the CPUC for review and approval. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared.”	<p>SCE recommends the following edits:</p> <p>“Data Recovery Plan. Data Recovery Plans for historical resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section 21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods, samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it an historical resource, and reporting procedure. This plan shall be submitted to the CPUC for review and approval. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared.”</p>
Table ES-2 Mitigation Measure column	ES-13	<p>MM CR-4 states:</p> <p>“MM CR-4: Paleontological Resources Monitoring. Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor all ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-7.”</p>	<p>Rationale:</p> <p>Please remove “all” to be consistent with language for MM CR-4 as described on page 4.4-28 Lines 19-22, which does not specify that all ground-disturbing activities within areas of moderate to high potential for paleontological resources will be monitored. Please include reference to the Paleontological Resource Management Plan (PRMP), which will provide details about monitoring and discovery protocols. The PRMP will be reviewed and approved by the CPUC prior to the start of construction.</p> <p>SCE recommends the following edits:</p> <p>“MM CR-4: Paleontological Resources Monitoring. Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor all ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources, <u>per the Paleontological Resources Management Plan (APM-CUL-01) reviewed and approved by the CPUC prior to construction.</u> The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-75.”</p>
Table ES-2 Mitigation Measure column	ES-13	<p>First paragraph of MM CR-5 states:</p> <p>“MM CR-5: Follow Paleontological Resource Discovery Protocol. In the case that a previously unknown paleontological resource is discovered during construction activities, all work within 15 meters of the resource shall be stopped, and the CPUC-approved paleontologist shall determine whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.”</p>	<p>Rationale:</p> <p>Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively.</p> <p>SCE recommends the following edits:</p> <p>“MM CR-5: Follow Paleontological Resource Discovery Protocol. In the case that a previously unknown paleontological resource is discovered during construction activities, all work within 15 meters of the resource shall be stopped, and the CPUC-approved paleontologist shall <u>consult with the applicant</u> to determine whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.”</p>
Table ES-2	ES-14	<p>Last paragraph of MM CR-5 states:</p> <p>“If the resource is unique, then work shall remain stopped, and the approved paleontologist shall</p>	<p>Rationale:</p> <p>Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented</p>

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

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Section	Page	DEIR Language	SCE Recommended Language
			“New overhead structures” “Double-circuit structures: 50 to 400 <u>130</u> feet high...”
Table 2-1	2-9	<p>Component</p> <p>Proposed Project Specifications</p> <p>“New UG structures and conduits” “3.4 miles of trench and 28 new vaults”</p>	<p>Rationale:</p> <p>On Table 2-1: Components of the Proposed Project, please update numbers based on current engineering design increasing mileage of trench for duct banks. Additional trenching is incremental increases to existing trenches based on current engineering design within previously identified disturbance areas.</p> <p>SCE recommends the following edits:</p> <p>Component</p> <p>Proposed Project Specifications</p> <p>“New UG structures and conduits” “3.4 <u>4.2</u> miles of trench and 28 <u>27</u> new vaults”</p>
Table 2-1	2-9	<p>Components</p> <p>“New underground structures and conduits”</p> <p>Proposed Project Specifications</p> <p>“13 vaults within Mesa Substation site and 15 vaults”</p>	<p>Rationale:</p> <p>On Table 2-1: Components of the Proposed Project, please update numbers based on current engineering design</p> <p>SCE recommends the following edits:</p> <p>Components</p> <p>“New underground structures and conduits”</p> <p>Proposed Project Specifications</p> <p>“13 <u>17</u> vaults within Mesa Substation site and 15 <u>10</u> vaults”</p>
Table 2-1	2-9	<p>North Area: City of Pasadena</p> <p>Quantity/Dimensions</p> <p>“One temporary TSP”</p> <p>Proposed Project Specifications</p> <ul style="list-style-type: none"> “Install temporary TSP (110 to 140 feet tall) to connect the Eagle Rock-Mesa 220-kV transmission line to Goodrich Substation.” 	<p>Rationale:</p> <p>Please update language from TSP to temporary structure to reflect SCE’s construction methods and to be consistent with Section 2.3.3.2 on Page 2-63.</p> <p>SCE recommends the following edits:</p> <p>North Area: City of Pasadena</p> <p>Quantity/Dimensions</p> <p>“One temporary TSP <u>structure</u>”</p> <p>Proposed Project Specifications</p> <ul style="list-style-type: none"> “Install temporary TSP <u>structure</u> (110 to 140 feet tall) to connect the Eagle Rock-Mesa 220-kV

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			transmission line to Goodrich Substation.”
Table 2-1	2-10	<p>Telecommunications (Overhead and Underground)</p> <p>Proposed Project Specifications</p> <ul style="list-style-type: none"> • “Reroute one existing telecommunications line to clear the Mesa Substation Construction area. • Relocate existing overhead and underground telecom lines using five existing vaults and one manhole” 	<p>Rationale:</p> <p>Please update numbers based on current engineering design.</p> <p>SCE recommends the following edits:</p> <p>Telecommunications (Overhead and Underground)</p> <p>Proposed Project Specifications</p> <ul style="list-style-type: none"> • “Reroute one Sixteen existing telecommunication lines to clear the Mesa Substation Construction area. • Relocate existing overhead and underground telecom lines using five <u>eight</u> existing vaults and one <u>six</u> manholes”
Table 2-1	2-11	<p>Main Project Area</p> <p>Quantity/Dimensions</p> <p>“18 existing vaults and 5 new vaults; 1.8 miles of new duct bank”</p>	<p>Rationale:</p> <p>Please update numbers based on current engineering design.</p> <p>SCE recommends the following edits:</p> <p>Main Project Area</p> <p>Quantity/Dimensions</p> <p>“18 existing vaults and 5 <u>8</u> new vaults; 1.8 miles of new duct bank”</p>
2.2.1.1	2-29, Figure 2-4	Figure 2-4 Proposed Mesa Substation Layout	<p>Rationale:</p> <p>Please replace the existing Figure 2-4 Proposed Mesa Substation Layout with the updated figure attached to this submittal, which more accurately reflects the current engineering design for the substation as well as the other linear elements. In particular, this design reflects the proper location of the relocated Operations Building and the Test and Maintenance Building closer to Greenwood Avenue.</p> <p>SCE recommends the following edits:</p> <p>Replace current Figure 2-4 Proposed Mesa Substation Layout with attached updated figure.</p>

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Section	Page	DEIR Language	SCE Recommended Language									
2.2.1.1	2-32 Lines 26-29	“Access to the proposed Mesa Substation would be provided by new asphalt and/or concrete access driveways from Potrero Grande Drive and East Markland Drive. The main entrance at Potrero Grande Drive would be 50 feet wide, while the secondary entrance from East Markland Drive would be approximately 30 feet wide.”	<p>Rationale: Please add in language about the Greenwood Avenue entrance that will be used for O&M only and not construction.</p> <p>SCE recommends the following edits: “Access to the proposed Mesa Substation would be provided by new asphalt and/or concrete access driveways from Potrero Grande Drive and East Markland Drive. The main entrance at Potrero Grande Drive would be 50 feet wide, while the secondary entrance from East Markland Drive would be approximately 30 feet wide. <u>A 26-foot wide paved driveway at Greenwood Avenue will be provided for operation and maintenance purposes of the new test and operations buildings</u>”</p>	D2-22								
2.2.1.4	2-38 Lines 17-18	<ul style="list-style-type: none"> “Installation of 24 overhead 66-kV structures, 17,000 feet of underground duct, and 15 vault structures.....” 	<p>Rationale: Please update numbers based on current engineering design. Please change “duct” to “duct bank” for further clarification.</p> <p>SCE recommends the following edits:</p> <ul style="list-style-type: none"> “Installation of 24 <u>23</u> overhead 66-kV structures, 17,000 <u>10,300 linear</u> feet of underground duct <u>bank</u>, and 15 <u>10</u> vault structures...” 	D2-23 D2-24								
2.2.1.4	2-39 Lines 7-9	“The TSPs would be steel structures with a dulled finish and approximately 3 to 5 feet in diameter at the base, extending approximately 50 to 100 feet above ground.”	<p>Rationale: Please update numbers based on current engineering design</p> <p>SCE recommends the following edits: “The TSPs would be steel structures with a dulled finish and approximately 3 to 5 feet in diameter at the base, extending approximately 50 to 100 <u>130</u> feet above ground”</p>	D2-25								
Table 2-4	2-39	<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Type of Structure</th> <th style="text-align: left;">Approximate Number of Structures</th> </tr> </thead> <tbody> <tr> <td>“Telecommunications Vault”</td> <td>“5”</td> </tr> </tbody> </table>	Type of Structure	Approximate Number of Structures	“Telecommunications Vault”	“5”	<p>Rationale: Under Table 2-4: Underground Structure Dimensions, please update numbers based on current engineering design.</p> <p>SCE recommends the following edits:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Type of Structure</th> <th style="text-align: left;">Approximate Number of Structures</th> </tr> </thead> <tbody> <tr> <td>“Telecommunications Vault”</td> <td>“5 <u>8</u>”</td> </tr> </tbody> </table>	Type of Structure	Approximate Number of Structures	“Telecommunications Vault”	“ 5 <u>8</u> ”	D2-26
Type of Structure	Approximate Number of Structures											
“Telecommunications Vault”	“5”											
Type of Structure	Approximate Number of Structures											
“Telecommunications Vault”	“ 5 <u>8</u> ”											
2.2.3.1	2-45 Lines	“For the proposed replacement of the existing LST on the Goodrich–Laguna Bell 220-kV transmission line, the applicant would use Flotilla Street (at its intersection with Garfield Avenue) as	<p>Rationale: Please update description to reflect correct access point roadway. The intersection described would not be a direct</p>	D2-27								

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

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

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

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Section	Page	DEIR Language	SCE Recommended Language	
2.5	2-79 Lines 9-10	“Additional O&M activities at the proposed Mesa Substation would include maintenance of non-electrical facilities, including restrooms, air conditioning, and general facilities housekeeping.”	<p>Rationale: MWD needs to be consulted on these plans or mitigation requirements to ensure they would have no effect on O&M activities or repairs related to the relocated Middle Feeder.</p> <p>SCE recommends the following edits: “Additional O&M activities at the proposed Mesa Substation would include maintenance of non-electrical facilities, including restrooms, air conditioning, and general facilities housekeeping, <u>and MWD’s relocated Middle Feeder.</u>”</p>	D2-40
2.5.2	2-80 Lines 47-48	“For further information about EMFs and CPUC guidelines, refer to: http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Fields ”	<p>Rationale: The hyperlink is no longer valid.</p> <p>SCE recommends the following edits: “For further information about EMFs and CPUC guidelines, refer to: http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Fields http://www.cpuc.ca.gov/general.aspx?id=4879”</p>	D2-41
2.5.2	2-81 Lines 4-10	<p>“SCE would incorporate the following low-cost/no-cost measures into the design of the proposed project:</p> <ul style="list-style-type: none"> • Utilizing subtransmission structure heights that meet or exceed SCE’s preferred EMF design criteria; • Utilizing double-circuit construction that reduces spacing between circuits as compared with single-circuit constructions; • Arranging conductors of proposed subtransmission lines for magnetic field reduction; and • Placing new substation electrical equipment away from the substation property lines closest to populated areas.” 	<p>Rationale: To be consistent with the Field Management Plan recommended EMF reduction measures. All the magnetic field reduction measures listed in the DEIR would be evaluated and implemented if they meet the CPUC no-cost and low-cost criteria and are engineering feasible.</p> <p>SCE recommends the following edits: “SCE would incorporate the following low-cost/no-cost measures into the design of the proposed project <u>if deemed feasible during current engineering design design</u>:</p> <ul style="list-style-type: none"> • Utilizing subtransmission structure heights that meet or exceed SCE’s preferred EMF design criteria; • Utilizing double-circuit construction that reduces spacing between circuits as compared with single-circuit constructions; • Arranging conductors of proposed subtransmission lines for magnetic field reduction; and • Placing new substation electrical equipment away from the substation property lines closest to populated areas.” 	D2-42
Table 2-11	2-84	State	<p>Rationale: Please update language to include a missing amendment in the permit referenced.</p>	D2-43

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

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

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

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

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

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

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

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

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cont.

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Section	Page	DEIR Language	SCE Recommended Language
	Lines 41-46	project and help blend them into the landscape setting, the finishes on all new transmission and other structures with metal surfaces shall be non-reflective and new conductors shall be non-specular. With the exception of LSTs, TSPs, and switchracks, all metal structures up to 35 feet high and visible from the vicinity of KOP 7 shall have finishes that are dark in color or otherwise colored to help blend the structures with their surroundings.”	<p>There are no new metal structures other than LSTs and TSPs visible from KOP 7. Please remove language referring to all other new metal structures (revised KOPs and Plot Plan are attached with SCE’s comment letter).</p> <p>SCE recommends the following edits:</p> <p>“MM AES-5: Glare Reduction. To reduce potential glare from components of the proposed project and help blend them into the landscape setting, the finishes on all new transmission and other structures with metal surfaces shall be non-reflective and new conductors shall be non-specular. With the exception of LSTs, TSPs, and switchracks, all metal structures up to 35 feet high and visible from the vicinity of KOP 7 shall have finishes that are dark in color or otherwise colored to help blend the structures with their surroundings.”</p>
AIR QUALITY			
4.2.4	4.2-21 Lines 12-37	<p>“MM AQ-1: Construction Emission Reduction Measures. SCE shall implement the following emission reduction measures for all construction activities:</p> <ol style="list-style-type: none"> 1. All off-road diesel-powered construction equipment with engines greater than 100 horsepower (hp) shall be compliant with Tier 4 off-road emissions standards where available. In the event that equipment with a Tier 4 engine is not available for any off-road engine larger than 100 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 4 emission levels. 2. All off-road diesel-powered construction equipment with engines greater than 50 hp shall be compliant with Tier 3 off-road emissions standards where available. In the event that equipment with a Tier 3 engine is not available for any off-road engine larger than 50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 3 emission levels. 	<p>Rationale:</p> <p>Regarding Items 1 and 2, it is SCE’s understanding that there is no industry standard process to retrofit lower tiered equipment to a higher tiered level. Therefore, when higher tiered equipment is not available, SCE proposes to comply with the process described in Item 3. Please consider striking the references to retrofitting in Items 1 and 2.</p> <p>Also, regarding Item 4, please consider striking the 15 day notification requirement because it puts an unworkable restriction on construction scheduling and response to unforeseen equipment replacement due to breakdowns. This modification will not change the air quality calculations.</p> <p>SCE recommends the following edits:</p> <p>“MM AQ-1: Construction Emission Reduction Measures. SCE shall implement the following emission reduction measures for all construction activities:</p>

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

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Section	Page	DEIR Language	SCE Recommended Language
			<p>“MM AQ-2: Volatile Organic Compounds Credits. The remaining emissions of VOC/ROG resulting from construction of the proposed Mesa Substation Project shall be mitigated through the purchase of Emissions Trading Credits (ETCs) for every pound of VOC/ROG in excess of the SCAQMD regional significance threshold of 100-75 pounds per day, as measured. The total amount of VOC/ROG ETCs to be purchased shall be calculated once the construction schedule is finalized. The applicant shall purchase and submit documentation of <u>the purchase of up to twice the estimated amount of credit</u> of the required ETC to the SCAQMD prior to the start of construction. The applicant shall also track actual daily ROG emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for ROG emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional ROG credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.”</p>
4.2.4	4.2-22 Lines 5-18	<p>“MM AQ-3: Measures to Reduce NOX Emissions. Prior to construction, the applicant and SCE will submit proposed additional measures to reduce daily emissions of NOX to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction. Measures may include the following:</p> <ol style="list-style-type: none"> 1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NOX emissions requirements if 2010 model year or newer diesel trucks cannot be obtained. 2. A requirement that, during project construction, all construction equipment shall be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. 3. Other measures as determined appropriate by the applicant and SCE in consultation with the SCAQMD.” 	<p>Rationale:</p> <p>SCE is unaware of any commercially available CARB certified BACT devices that would be appropriate for use during this construction project.</p> <p>SCE recommends the following edits:</p> <p>“MM AQ-3: Measures to Reduce NOX Emissions. Prior to construction, the applicant and SCE will submit proposed additional measures to reduce daily emissions of NOX to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction. Measures may include the following:</p> <ol style="list-style-type: none"> 1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NOX emissions requirements if 2010 model year or newer diesel trucks cannot be obtained. 2. A requirement that, during project construction, all construction equipment shall be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. 2.3. Other measures as determined appropriate by the applicant and SCE in consultation with the SCAQMD.”
4.2.4	4.2-22 Lines 20-39	<p>“MM AQ-4: Mitigation Agreement for Purchase of Oxides of Nitrogen (NOX) Credits. Twenty days prior to the start of project construction, the applicant shall provide CPUC staff with an estimate of the total construction -related NOX emissions after implementation of all applicable mitigation measures, broken down by individual construction day. All NOX emissions that would exceed the daily threshold of 100 pounds per day shall be offset through the purchase of either Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction</p>	<p>Rationale:</p> <p>Mitigation Measure AQ-4 as written requires tracking actual daily NO_x emissions. Based on SCE’s experience with tracking actual daily emissions from a previous project with a similar mitigation measure, this type of daily recordkeeping requirement is incredibly labor intensive for both the applicant and the reviewing agency. Determining actual daily NO_x emissions would be accomplished by each equipment operator maintaining</p>

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

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Section	Page	DEIR Language	SCE Recommended Language
BIOLOGICAL RESOURCES			
Table 4.3-1	4.3-6	<p>Non-native Vegetation</p> <p>“This vegetation type is dominated by weedy non-native plants that thrive in areas repeatedly disturbed by human activity. In the proposed project area this vegetation type includes crimson fountain grass (<i>Pennisetum setaceum</i>), black mustard, short-podded mustard, wild radish, tocalote (<i>Centaurea melitensis</i>), prickly lettuce (<i>Lactuca serriola</i>), telegraph weed (<i>Heterotheca grandiflora</i>), Russian thistle (<i>Salsola tragus</i>), woolly mullein (<i>Verbascum thapsus</i>), and sweet fennel (<i>Foeniculum vulgare</i>). This habitat type typically supports few wildlife species but is used extensively by coastal California gnatcatcher for foraging and breeding to the south of the current Mesa Substation. Non-native vegetation within the proposed project area also supports loggerhead shrike and least Bell’s vireo.”</p>	<p>Rationale:</p> <p>Based on Figure 4.3-1 and Figure 5 of Appendix D, least Bell’s vireo was documented in the Disturbed/Developed vegetation type. There are no observation for this species in Non-native Vegetation.</p> <p>SCE recommends:</p> <p>Non-native Vegetation</p> <p>“This vegetation type is dominated by weedy non-native plants that thrive in areas repeatedly disturbed by human activity. In the proposed project area this vegetation type includes crimson fountain grass (<i>Pennisetum setaceum</i>), black mustard, short-podded mustard, wild radish, tocalote (<i>Centaurea melitensis</i>), prickly lettuce (<i>Lactuca serriola</i>), telegraph weed (<i>Heterotheca grandiflora</i>), Russian thistle (<i>Salsola tragus</i>), woolly mullein (<i>Verbascum thapsus</i>), and sweet fennel (<i>Foeniculum vulgare</i>). This habitat type typically supports few wildlife species but is used extensively by coastal California gnatcatcher for foraging and breeding to the south of the current Mesa Substation. Non-native vegetation within the proposed project area also supports <u>foraging</u> loggerhead shrike and least Bell’s vireo.”</p>
Table 4.3-2	4.3-13	<p>The Table 4.3-2 contains the following information.</p> <p>“Nevin’s barberry (<i>Berberis nevinii</i>)</p> <p><i>Present:</i> This species was observed in Whittier Narrows Natural Area adjacent to an existing distribution pole and paved pathway within the corridor for Telecommunications Route 3 during December 2014 field surveys.</p> <p>Intermediate mariposa-lily (<i>Calochortus weedii</i> var. <i>intermedius</i>)</p> <p>Moderate: Suitable habitat for this species occurs along Telecommunications Route 3 where it parallels East Lincoln Avenue. CNDDB occurrences from 2008-2010 are located in the Puente Hills area, approximately 2.5 miles south of Telecommunications Route 3.</p> <p>Plummer’s mariposa-lily (<i>Calochortus plummerae</i>)</p> <p>Moderate: This species has been recorded extensively in the Puente Hills area, approximately 2.5 miles south of Telecommunications Route 3. Suitable habitat occurs along Telecommunications Route 3 where it parallels East Lincoln Avenue.</p>	<p>Rationale:</p> <p>There is an apparent discrepancy between the protocol rare plant survey results (Appendix F) and this table. Please consider the following:</p> <ol style="list-style-type: none"> 1) Nevin’s Barberry also was found during protocol botany surveys 2015. Also, the botanist noted that this appears to be planted. There are other individuals outside of the survey area within the Nature Center parking lot planter. 2) Protocol surveys for intermediate mariposa-lily, plummer’s mariposa-lily, and southern tarplant were conducted in 2015. All three species were observed at local reference populations. Meaning, when the botanists performed surveys for the Mesa project, these three species would have been observable, if present. The lack of observations in Appendix F cannot be a product of observer error or the plant not currently flowering. The more logical conclusion is that these species are absent. In effect, the protocol surveys provide substantial evidence that the species are absent or, at best, have a low potential to occur. 3) Table is missing Coulter's matilija poppy (<i>Romneya coulteri</i>). According to Appendix F, this species was observed and needs to be added after southern tarplant. <p>SCE recommends the following edits:</p> <p>“Nevin’s barberry (<i>Berberis nevinii</i>)</p>

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

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Table 4.3-3	4.3-15	“Present: Least Bell’s vireos were observed nesting and foraging primarily in riparian areas along Telecommunications Route 3 and foraging within the proposed Mesa Substation site area and adjacent 500-kV transmission corridor.”	<p>Rationale:</p> <p>Least Bell’s vireo was not observed foraging within the Mesa Substation site, as documented in Figure 5 of Appendix D of the DEIR. There was one observation of least Bell’s Vireo, during migration, within the nursery located in the adjacent 500-kV transmission corridor. The mulefat scrub lacks multi-level canopy required by this species. Further, the total acres of mulefat are smaller than the typical territory size for Least’s Bell’s vireo. For this reason, SCE believes the habitat on site is marginal at best. On April 15, 2015, USFWS concurred that surveying the Mesa substation site was unnecessary given the lack of habitat. Given the lack of observations of this species on the Mesa Substation site, SCE disagrees with the DEIR where it states that this species was “observed” foraging at the Mesa Substation site.</p> <p>SCE Recommends the following changes.</p> <p>“Present: Least Bell’s vireos were observed nesting and foraging primarily in riparian areas along Telecommunications Route 3 and foraging <u>during migration</u> within the proposed Mesa Substation site area and adjacent 500-kV transmission corridor.”</p>	D2-71
4.3.3.3	4.3-32 Lines 10-12	“The California black walnut is ranked as an S3 species, indicating that the species is vulnerable (CDFW 2010). In addition, it is ranked by the CNPS as 4.2, indicating that the species is of limited distribution and is moderately threatened fairly endangered in California (CNPS 2015).”	<p>Rationale:</p> <p>CEQA BR-1 addresses individual species, not plant communities. Lines 10-11 incorrectly list California black walnut as an S3 species. Global (G) and State (S) rankings apply to plant communities and not individuals. Further, the reference provided of CDFW 2010 is the state list of plant communities, including sensitive plant communities. Walnut will form a plant community with a state ranking of S3, but walnut communities should be addressed under CEQA BR-2. As such, this section only applies to the individual, which has a rarity ranking of 4.3.</p> <p>Further, Line 12 mischaracterizes the CNPS-designated rarity ranking. The term “endangered” is only applicable for plants with a 1B or 2B rarity ranking. Instead CNPS defines 0.2 as “Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat).” Therefore, “fairly endangered” should be changed to “moderately threatened.”</p> <p>SCE recommends the following edits:</p> <p>“The California black walnut is ranked as an S3 species, indicating that the species is vulnerable (CDFW 2010). In addition, it is ranked by the CNPS as 4.2, indicating that the species is of limited distribution and is fairly endangered <u>moderately threatened</u> in California (CNPS 2015).”</p>	D2-72
4.3.3.3	4.3-33 Lines 11-22	”Work within suitable habitat where this species has moderate potential to occur primarily includes installation of telecommunications cable on existing poles. A 275-foot segment of telecommunications cable at the eastern terminus of Telecommunications Route 1 would also be installed underground in new conduit. In addition, access and spur road improvement or rehabilitation may be required for construction and operations and could include clearing, grubbing, widening, and constructing drainage improvements. Although no permanent ground disturbance or vegetation removal is planned in the location of known individual Southern tarplant occurrences, direct impacts to known or unknown occurrences of this species could occur if they are present in the proposed work area. Indirect impacts could also occur if the species is present within or adjacent to work areas. Indirect impacts could result from dust settling on plants and from the spread of	<p>Rationale:</p> <p>Based on existing conditions, protocol rare plant surveys did not observe southern Tarplant, even though the species was available to be observed given it was evident at other local populations and observed at the reference populations by the botanist. Therefore, SCE disagrees with the conclusion that it has a “moderate potential to occur” and “impact to southern tarplant would be significant.” Given it is a species with a fairly good ability to disperse, at best, it should be given a low potential to occur. The impact analysis is inconsistent with results in Appendix F.</p> <p>Also note, “moderate” potential in text here contradicts “high” potential listed in Table 4.3-2.</p>	D2-73

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

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

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			APM-BIO-01, APM-BIO-02, and APM-BIO-03, these APMs would not reduce impacts to this species to less than significant because success criteria for replanting and replacement ratios are not included, and worker training to identify the resource is not included. Therefore, the applicant would be required to implement MM BR-1, which would require pre-construction surveys; MM BR-2, which requires delineating work areas occurring in the vicinity of sensitive species; MM BR-5, which require that workers receive training in plant identification, the proposed project’s environmental commitments, and how best to avoid impacting sensitive plant species; and MM BR-8, which would require mitigation for impacts to intermediate mariposa lily at a 1:1 ratio. <u>Although the species was determined to be absent, if observed during construction, With the implementation of MM BR-1, MM BR-2, MM BR-5, and MM BR-8, in combination with the APMs identified above, impacts would be reduced impacts to less than significant.</u>								
4.3.3.3	4.3-35 Lines 39-40	“MM BR-2, which requires installation of exclusionary fencing to delineate the designated work areas and avoid sensitive resources”	<p>Rationale:</p> <p>Exclusionary fencing is typically used for listed reptiles and amphibians. The additional fencing requirement has a potential to increase biological impacts. The work needed to be done at each pole (i.e., line stringing) is a short duration activity, ranging between two to eight hours a day for one to two days. This work does not require ground-disturbance. Therefore, requiring exclusionary fencing around each pole increases ground disturbance, which is not being captured in the impact analysis for this species. Further, many of the poles are located along roads where work would be conducted directly from the road and shoulder; SCE could not practically install fencing on the roads to protect these work locations.</p> <p>SCE recommends the following edits:</p> <p>“MM BR-2, which requires <u>flagging and avoidance of installation of exclusionary fencing to delineate the designated work areas and avoid sensitive resources areas</u>”</p>								
4.3.3.3	4.3-37 and 4.3-38 Lines 42-47 and Lines 1-2	“The proposed project area contains suitable habitat for several special-status birds as well as those protected by the MBTA and Fish and Game Code. Raptor species, such as the peregrine falcon and Swainson’s hawk, were observed within the main project area during surveys and may have been 45 foraging or flying through.”	<p>Rationale:</p> <p>Despite the DEIR identifying three raptors, there is no text covering these species or explanation as to why they were not addressed. SCE recommends addressing these three species in the Special Status Birds paragraph only.</p> <p>SCE recommends the following edits:</p> <p>“The proposed project area contains suitable habitat for several special-status birds as well as those protected by the MBTA and Fish and Game Code. Raptor species, such as the peregrine falcon and Swainson’s hawk, were observed within the main project area during surveys and may have been 45 foraging or flying through. <u>In addition, White-tailed Kite could forage in areas along the telecommunications route. These three raptors do not have nesting habitat present and would only occur during migration and/or foraging and will not be discussed further.</u>”</p>								
4.3.3.3	4.3-39	Table 3.4-4 states: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Project Component</th> <th style="text-align: center;">Approximate Impact Area</th> <th style="text-align: center;">Approximate Temporary Impacts</th> <th style="text-align: center;">Approximate Permanent Impacts</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Project Component	Approximate Impact Area	Approximate Temporary Impacts	Approximate Permanent Impacts					<p>Rationale:</p> <p>This table has not incorporated results of the 2015 protocol surveys. As such, the habitat is limited to the transmission, subtransmission, and distribution areas along existing powerlines south of the existing substation. Further, there are areas where grading cannot occur because restoration or EPA sites cannot have vegetation clearing, thereby slightly reducing the impacts. Many of the areas where gnatcatcher was present is atypical</p>
Project Component	Approximate Impact Area	Approximate Temporary Impacts	Approximate Permanent Impacts								

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			(acres)	(acres)	(acres)	habitat. SCE recommends the following edits:					
		Proposed Mesa Substation	21.54	7.45	14.09	Project Component	Approximate Impact Area (acres)	Approximate Temporary Impacts to Coastal Sage Scrub (acres)	Approximate Permanent Impacts to Coastal Sage Scrub (acres)	Approximate Temporary Impacts to Atypical Habitat (acres)	Approximate Permanent Impacts to Atypical Habitat (acres)
		Associated transmission, subtransmission, and distribution lines	2.06	1.92	0.14	Proposed Mesa Substation	21.54	7.45 <u>0.0</u>	14.09 <u>0.0</u>	<u>7.45</u>	<u>14.09</u>
		Telecommunication Route 2a	0.43	0.43	0.0	Associated transmission, subtransmission, and distribution lines	2.06	1.92 <u>0.98</u>	0.14 <u>0.02</u>	<u>0.94</u>	<u>0.12</u>
		Telecommunication Route 3	2.28	2.28	0.0	Telecommunication Route 2a	0.43	0.43	0.0	0.0	0.0
		Total	26.31	12.08	14.23	Telecommunication Route 3	2.28	2.28	0.0	0.0	0.0
		Impacts within USFWS Critical Habitat	1.89	1.89	0.0	Total	26.31 <u>4.37</u>	12.08 <u>3.69</u>	14.23 <u>0.02</u>	<u>8.39</u>	<u>14.21</u>
						Impacts within USFWS Critical Habitat	1.89	1.89	0.0	0.0	0.0
4.3.3.3	4.3-39 Lines 12-32	“During habitat assessments, suitable habitat was considered to be coastal sage scrub with greater than 50 percent cover, consisting of species such as California sagebrush and/or California buckwheat, or areas consisting of a matrix of sparse, scattered coastal sage scrub shrubs and annual/biennial vegetation with sufficient morphological structure and density to support coastal California gnatcatcher nesting and provide foraging opportunities (Insignia 2015b). Direct impacts to this species or its nest could occur as a result of vehicular collision and nest failure or abandonment due to noise and human presence during construction; this would be a significant				Rationale: The DEIR uses information from the BRTR, which did not have USFWS protocol surveys conducted. Therefore, the conclusions within the BRTR are preliminary. The protocol surveys (Appendix G) came to more substantive conclusions regarding habitat, which are in line with USFWS definitions of habitat. Non-native grasslands or ruderal areas are not habitat for California Gnatcatcher and can be considered as atypical habitat for Gnatcatcher occurrences. The ruderal vegetated areas onsite cannot be classified as coastal sage scrub, nor is there evidence that suggests these areas were historically coastal sage scrub. In fact, historic aerial photos show that this coastal sage					

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		<p>impact. APM-BIO-03 commits SCE to monitoring construction activities to the extent feasible. APM-BIO-04 commits SCE to conducting pre-construction surveys for the coastal California gnatcatcher if construction activities occur during the avian nesting season; establishing an exclusionary buffer, in coordination with USFWS, if a nest is observed,; and full-time monitoring of construction activities in occupied habitat. Direct impacts would still be significant because APM-BIO-3 does not ensure proper monitoring protocols are followed and APM-BIO-04 would not require the established protocol to be used for gnatcatcher surveys.</p> <p>Indirect impacts to this species could result from habitat modifications through vegetation trimming, clearing of vegetation, and other ground-disturbing activities. The proposed project would include removal of approximately 14.23 acres of coastal California gnatcatcher habitat. As described further in Table 4.3-4, temporary impacts to 1.89 acres of USFWS designated gnatcatcher critical habitat along Telecommunications Route 3 may occur. Indirect impacts would be significant.”</p>	<p>scrub was planted in 2009.</p> <p>SCE recommends that the habitat designation should be limited to coastal sage scrub and not all of the atypical habitat being characterized in the DEIR. Indeed, if the coastal sage scrub were absent from this site and/or the cumulative impact from the adjacent project removes vegetation, there would be no expectation for California Gnatcatcher to occur.</p> <p>SCE recommends the following edits:</p> <p>“During <u>the initial</u> habitat assessments, suitable habitat was considered to be coastal sage scrub with greater than 50 percent cover, consisting of species such as California sagebrush and/or California buckwheat, or areas consisting of a matrix of sparse, scattered coastal sage scrub shrubs and annual/biennial vegetation with sufficient morphological structure and density to support coastal California gnatcatcher nesting and provide foraging opportunities (Insignia 2015b). <u>However, protocol-level surveys by a permitted California Gnatcatcher biologist found that the suitable habitat was moderate and high quality coastal sage scrub, disturbed/fragmented coastal sage scrub, and revegetated coastal sage scrub (Appendix G). The ruderal area adjacent to habitat occasionally have nesting attempts, all of which have failed. These ruderal areas only have California Gnatcatcher present because the small amount of quality habitat restricts the population size and dispersal, resulting in individuals attempting to nest in atypical adjacent habitat.</u></p> <p>Direct impacts to this species or its nest could occur as a result of vehicular collision and nest failure or abandonment due to noise and human presence during construction; this would be a significant impact. APM-BIO-03 commits SCE to monitoring construction activities to the extent feasible. APM-BIO-04 commits SCE to conducting pre-construction surveys for the coastal California gnatcatcher if construction activities occur during the avian nesting season; establishing an exclusionary buffer, in coordination with USFWS, if a nest is observed,; and full-time monitoring of construction activities in occupied habitat. Direct impacts would still be significant because APM-BIO-3 does not ensure proper monitoring protocols are followed and APM-BIO-04 would not require the established protocol to be used for gnatcatcher surveys.</p> <p>Indirect impacts to this species could result from habitat modifications through vegetation trimming, clearing of vegetation, and other ground-disturbing activities. The proposed project would include removal of approximately 14.23 <u>1.0</u> acres of coastal California gnatcatcher habitat. As described further in Table 4.3-4, temporary impacts to 1.89 acres of USFWS designated gnatcatcher critical habitat along Telecommunications Route 3 may occur. Indirect impacts would be significant.”</p>
4.3.3.3	Page 4.3-40 Lines 28-35	<p>“Least Bell’s vireo is a federally and state endangered species. It has been observed foraging within the proposed Mesa Substation site area and adjacent 500-kV transmission line corridor as well as nesting along portions of Telecommunications Route 3. Construction activities, such as clearing vegetation and grading within the proposed Mesa Substation site and along Telecommunications Route 3 could result in direct impacts, including injury or mortality to an individual least Bell’s vireo or the loss of a nest as a result of human presence, dust, or noise. Construction activities could also result in indirect impacts such as the disruption of nesting or foraging behaviors or the loss of habitat. Impacts to least Bell’s vireo would be significant.”</p>	<p>Rationale:</p> <p>Least Bell’s vireo was not observed foraging within the Mesa Substation site, as documented in Figure 5 of Appendix D of the DEIR. There was one observation of least Bell’s vireo, during migration, within the nursery located in the adjacent 500-kV transmission corridor. The mulefat scrub lacks multi-level canopy required by this species. Further, the total acres of mulefat are smaller than the typical territory size for Least’s Bell’s vireo. SCE believes the habitat on site is marginal at best for least Bell’s Vireo. In addition, it has never been observed foraging within this mulefat on site. On April 15, 2015, USFWS concurred that surveying the Mesa substation site was unnecessary given the lack of habitat. Given the lack of observations of this species on the Mesa Substation</p>

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

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

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

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	45-46 and Lines 1-2		<p>communities to 70% cover to align with the project SWPPP requirements. The 80% cover may not be naturally achievable for a given plant community, and could result in areas becoming non-habitat for the listed and sensitive wildlife that the habitat restoration hopes to achieve.</p> <p>SCE recommends the following edits:</p> <p>“For Options 1 and 2 (onsite and offsite), the plan shall specify restoration details, including that post-construction monitoring shall be performed for a minimum of four years, a success criteria of restoring native vegetation to the same pre-existing conditions, <u>achieving establishment of 70 80% relative cover, shall be met, and r Remedial</u> measures shall be implemented if success criteria are not met.”</p>	D2-89 cont.
4.3.4	4.3-57 Lines 19-21	“Trimming of native trees and native arborescent shrubs shall be completed outside of the nesting bird season and shall be monitored by a qualified biologist.”	<p>Rationale:</p> <p>Please modify language to allow the trimming of vegetation outside of the nesting bird season without monitoring requirements.</p> <p>SCE recommends the following edits: “Trimming of native trees and native arborescent shrubs shall be completed outside of the nesting bird season and shall be monitored by a qualified biologist.”</p>	D2-90
4.3.4	4.3-57 Lines 27-29	“This plan shall be developed in consultation with CDFW and CPUC and shall be provided to these agencies for review and comment.”	<p>Rationale:</p> <p>Please update listed reviewing agencies to be more inclusive for consultation.</p> <p>SCE recommends the following edits: “This plan shall be developed <u>as required by agency permits and</u> in consultation with CDFW and CPUC and shall be provided to these agencies for review and comment.”</p>	D2-91
4.3.4	4.3-57 Lines 42-44	<ul style="list-style-type: none"> “Vehicle and equipment wash stations (mobile or built in place) shall be erected at strategic locations on the ROW where designated weed species have been detected, and where doing so would help prevent the spread of these species.” 	<p>Rationale:</p> <p>The Mesa project lies within the same weed zone so it is unclear what the purpose of washing will do when moving from one part of the project to the other. Mesa consists almost entirely of invasive species that are ubiquitous throughout the project area. Adding water to the site, even when contained to wash stations, has the potential to increase biological impacts since annual invasive species can be expected to increase near the wash stations.</p> <p>SCE recommends the following edits:</p> <ul style="list-style-type: none"> “Vehicle and equipment wash stations (mobile or built in place) shall be erected at strategic locations on the ROW where designated weed species have been detected, and where doing so would help prevent the spread of these species.” 	D2-92
4.3.4	4.3-58 Lines 3-5	“All temporary disturbance areas that will be restored post-construction shall be monitored for invasive species establishment on a monthly basis for at least one year after project restoration is completed.”	<p>Rationale:</p> <p>SCE recommends a less prescribed survey schedule, since the growing season for annual invasive plants is not year-round and tied to rains (the Santa Barbara County Reliability Project FEIR approved monitoring on a quarterly basis). Furthermore, much of the existing plant communities are not native and/or dominated by invasive species. The language in the current DEIR sounds like it is trying to mitigate for impacts that have previously occurred. SCE proposes to restore the sites to their existing condition (i.e., weed communities) and proposes monitoring for</p>	D2-93

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

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

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		<p>plant, which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. CPUC approval is required before the plan is implemented.</p> <p>For temporary impacts to special-status plants, restoration shall occur after construction and to an extent such that “no net loss” is ensured for all special-status plants in the proposed project component areas. The number of plants at seven years will be equal to or greater than the number destroyed.</p> <p>Mitigation for permanent impacts shall be completed by:</p> <ol style="list-style-type: none"> 1. Establishing individual plants within the proposed project areas (onsite); 2. Establishing individual plants outside the project areas (offsite); or 3. Purchase of credits and/or mitigation lands at a ratio of 2:1 from an entity approved by CDFW. <p>For Options 1 and 2 (establishing plants onsite or offsite), the plan shall include the following elements: planting/seeding palettes; monitoring and contingency program; monitoring schedule, including duration (seven years) and performance criteria (no-net loss); and any specific measures that will be required to ensure success of the restoration effort.”</p>	<p>California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 3:1 ratio. If the diameter at breast height of the tree to be removed is 24 inches or less, it shall be replaced with a 24 inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36 inch box tree. Replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established.</p> <p>Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC, and in consultation with USFWS and CDFW. Replacement trees shall be planted before tree removal, or if not feasible or if potentially harmful to the replacement trees, as soon as possible after removal.</p> <p>MM BR-8: Restoration of Special-status Plants. The applicant shall complete pre-construction surveys during the appropriate blooming period to identify special-status plants, including Plummer’s mariposa lily, intermediate mariposa lily, and Southern California tarplant populations in the proposed project component areas where suitable habitat is present. Special status plants shall be identified by <u>If pre-construction surveys find special-status plants, a qualified biologist and they will be</u> flagged or surrounded with fencing in such a way that disturbance of the populations or individuals shall be avoided. In the event that populations or individuals cannot be avoided, the applicant shall develop and implement a restoration plan for each plant, which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. CPUC approval is required before the plan is implemented. <u>Additionally, SCE will coordinate with MWD with respect to planting locations to ensure there is no effect on MWD O&M activities with regards to the relocated Middle Feeder.</u></p> <p><u>In addition, SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of current engineering design design of project features), black walnut trees identified in the impact area will be evaluated by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots. California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 2:1 ratio. Tree removal shall not be permitted until a detailed plan for restoration, is approved by the CPUC.</u></p> <p>For temporary impacts to special-status plants, restoration shall occur after construction and to an extent such that “no net loss” is ensured for all special-status plants in the proposed project component areas. The number of plants at seven years will be equal to or greater than the number destroyed.</p> <p>Mitigation for permanent impacts shall be completed by:</p> <ol style="list-style-type: none"> 1. Establishing individual plants within the proposed project areas (onsite);

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

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

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

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	1-3		<p>SCE proposes adding defined timeframes for agency notifications.</p> <p>SCE recommends the following edits:</p> <p>“In the event that least Bell’s vireo territory or nest sites are confirmed, SCE shall notify the USFWS and CDFW immediately <u>within 48 hours</u> upon return from the field.”</p>
4.3.4	4.3-62 Lines 13-16	1. “In those areas where riparian vegetation is required to be removed, SCE shall work with a qualified botanist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ.”	<p>Rationale:</p> <p>SCE will minimize impacts to areas where riparian vegetation does not need to be removed as part of construction. The measure, as it stands, may conflict with the project description, which requires removal of riparian vegetation on the substation site.</p> <p>SCE recommends the following edits:</p> <p style="padding-left: 40px;">1. In those areas where riparian vegetation is required to be removed, SCE shall work with a qualified botanist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ.”</p>
4.3.4	4.3-62 Lines 32-38	“ MM BR-15: Avian Protection Plan. SCE shall adhere to recommendations published by APLIC (Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012). In addition SCE shall develop and implement an Avian Protection Plan according to Avian Protection Plan Guidelines (APLIC and USFWS 2005). The plan shall include provisions to reduce impacts on avian species during operation of the proposed project, and shall provide for the adaptive management of project-related issues. The plan shall be submitted for review to CDFW, USFWS, and the CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented.”	<p>Rationale:</p> <p>SCE has a company-wide Avian Protection Plan (APP) that has previously been provided to USFWS. The APP is company-wide to allow for consistent management of protected bird species throughout SCE's territory. SCE's APP provides the company with the means to comply with state and federal laws protecting birds for CEQA and non-CEQA projects. As APPs, in general, are not project specific, the existing company-wide plan will be implemented for Mesa.</p> <p>SCE recommends the following edits:</p> <p>“MM BR-15: Avian Protection Plan. SCE shall adhere to recommendations published by APLIC (Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012). In addition SCE shall develop and implement an <u>SCE will implement the USFWS approved company-wide</u> Avian Protection Plan according to Avian Protection Plan Guidelines (APLIC and USFWS 2005). The plan shall include provisions to reduce impacts on avian species during operation of the proposed project, and shall provide for the adaptive management of project-related issues. The plan shall be submitted for review to CDFW, USFWS, and the CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented.”</p>
CULTURAL & PALEONTOLOGICAL RESOURCES			
4.4 Cultural and Paleontol ogical Resource s	4.4-1 Line 10	“Cultural resources discussed in this section include historic resources, archeological resources...”	<p>Rationale:</p> <p>Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age.</p> <p>SCE recommends the following edits:</p>

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			“Cultural resources discussed in this section include <u>historical</u> resources, archeological resources...”	D2-108 cont.
4.4	4.4-1 Lines 14-23	“Historic Resources: The California Environmental Quality Act (CEQA) defines historic resources as resources that are listed on, or determined to be eligible for listing on, the California Register of Historical Resources (CRHR) or a local register, or are otherwise determined to be historic pursuant to CEQA or the CEQA Guidelines (Public Resources Code [PRC] § 21084.1 or Code of Regulations, Title 14, § 15064.5, respectively). According to the CEQA Guidelines, a historic resource may be an object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in terms of California’s architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records. Typically, in order to be considered historic for purposes of listing, a resource must be at least 50 years old.”	<p>Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age.</p> <p>SCE recommends the following edits: “<u>Historical</u> Resources: The California Environmental Quality Act (CEQA) defines <u>historical</u> resources as resources that are listed on, or determined to be eligible for listing on, the California Register of Historical Resources (CRHR) or a local register, or are otherwise determined to be <u>historical</u> pursuant to CEQA or the CEQA Guidelines (Public Resources Code [PRC] § 21084.1 or Code of Regulations, Title 14, § 15064.5, respectively). According to the CEQA Guidelines, a <u>historical</u> resource may be an object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in terms of California’s architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records. Typically, in order to be considered <u>historical</u> for purposes of listing, a resource must be at least 50 years old.”</p>	D2-109
4.4	4.4-1 Line 24	“Archaeological Resources: Archaeological resources may be considered historic...”	<p>Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age.</p> <p>SCE recommends the following edits: “Archaeological Resources: Archaeological resources may be considered <u>historical</u>...”</p>	D2-110
4.4.1.2	4.4-6 Line 34	“To determine the potential for built environment historic resources, ASM reviewed current and...”	<p>Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age.</p> <p>SCE recommends the following edits: “To determine the potential for built environment <u>historical</u> resources, ASM reviewed current and...”</p>	D2-111
4.4.1.2	4.4-7 Line 20	“...because no potential built environment historic resources were identified in examination of aerial...”	<p>Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age.</p> <p>SCE recommends the following edits: “...because no potential built environment <u>historical</u> resources were identified in examination of aerial...”</p>	D2-112
4.4.1.3	4.4-10 Line 45	states: ...considered historic resources under CEQA.	<p>Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1.,</p>	D2-113

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			<p>Section 15064.5) rather than a resource of historical age.</p> <p>SCE recommends the following edits: “...considered <u>historical</u> resources under CEQA.”</p>	D2-113 cont.
Table 4.4-1	4.4-11	Table footnote states: “CRHR California Register of Historic Resources”	<p>Rationale: Please revise to correct name of inventory (PRC 5024.1).</p> <p>SCE recommends the following edits: “CRHR California Register of <u>Historical</u> Resources”</p>	D2-114
Table 4.4-2	4.4-12	Table footnote states: “CRHR California Register of Historic Resources”	<p>Rationale: Please revise to correct name of inventory (PRC 5024.1).</p> <p>SCE recommends the following edits: “CRHR California Register of <u>Historical</u> Resources”</p>	D2-115
Table 4.4-3	4.4-13	Table footnote states: “CRHR California Register of Historic Resources”	<p>Rationale: Please revise to correct name of inventory (PRC 5024.1).</p> <p>SCE recommends the following edits: “CRHR California Register of <u>Historical</u> Resources”</p>	D2-116
4.4.1.3	4.4-13 Line 20	“NRHP/CRHR eligibility (Williams 2014). Additionally, Historic Resource Analysis Reports/Historic...”	<p>Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age.</p> <p>SCE recommends the following edits: “NRHP/CRHR eligibility (Williams 2014). Additionally, <u>Historical</u> Resource Analysis Reports/Historic...”</p>	D2-117
Table 4.4-4	4.4-14	Table footnote states: “CRHR California Register of Historic Resources”	<p>Rationale: Please revise to correct name of inventory (PRC 5024.1).</p>	D2-118

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			SCE recommends the following edits: CRHR California Register of Historical Resources	D2-118 cont.
4.4.2.1	4.4-19 Lines 2-3	“Sections of the proposed project would require a permit from the United States Army Corps of Engineers under Section 408”	Rationale: SCE has had communications with the Army Corps of Engineers and they have indicated that a 408 permit is not required, pending official documentation SCE recommends the following edits: “Sections of the proposed project would <u>likely not</u> require a permit from the United States Army Corps of Engineers under Section 408”	D2-119
4.4.2.2	4.4-20 Line 14	“...groups, and citizens in identifying the existing historic resources of the State and to indicate which...”	Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: “...groups, and citizens in identifying the existing <u>historical</u> resources of the State and to indicate which...”	D2-120
4.4.3.3	4.4-26 Lines 2-7	“No historic or archeological sites were identified during a record search or pedestrian surveys at the proposed project area for proposed transmission structure replacement in the City of Commerce or at the proposed conversion of the street light conductors from overhead to underground within the City of Bell Gardens. Therefore, impacts related from construction of the transmission structure or conversation of the street light conductors would be less than significant under this criterion.”	Rationale: No historic or archaeological sites were identified in the South Area; therefore, there would be no impacts. This approach is consistent with “no impact” statements for the “Mesa 500-kV Substation Site Area” (Page 4.4-24; Line 22), “Telecommunications Routes (Page 4.4-24; Line 40), “Existing Substation Modifications” (Page 4.4-25; Line 25, 33, and 40), and “North Area” (Page 4.4-25; Line 47). SCE recommends the following edits: “No historic or archeological sites were identified during a record search or pedestrian surveys at the proposed project area for proposed transmission structure replacement in the City of Commerce or at the proposed conversion of the street light conductors from overhead to underground within the City of Bell Gardens. Therefore, <u>there would be no</u> impacts related from construction of the transmission structure or conversation <u>conversion</u> of the street light conductors would be less than significant under this criterion. ”	D2-121
4.4.3.3	4.4-26 Line 45	“...potential to directly or indirectly impact a historic resource. Therefore, operations and...”	Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age.	D2-122

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

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			concrete footings and shack at site SAY-S-1 are evaluated and found not to be a historical resource or not contribute to the eligibility of a historical resource, no further management is required during construction.”	D2-125 cont.
4.4.4	4.4-30 Lines 9-14	“ MM CR-3: Previously Unidentified Cultural Resources. If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an “environmentally sensitive area.” Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/archaeologist qualified archaeologist and the CPUC shall be notified immediately.	Rationale: Please include notification of SCE to allow for efficient coordination. SCE recommends the following edits: “ MM CR-3: Previously Unidentified Cultural Resources. If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an “environmentally sensitive area.” Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/ archaeologist qualified archaeologist, <u>SCE</u> , and the CPUC shall be notified immediately.”	D2-126
4.4.4	4.4-30 Lines 16-24	“Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist determines that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center.”	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. SCE recommends the following edits: “Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist <u>and</u> SCE determines that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist <u>and</u> <u>SCE</u> shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center.”	D2-127
4.4.4	4.4-30 Lines 26-31	“ Determination if a resource is an historical resource. The CPUC-approved cultural resources specialist/qualified archaeologist, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historic resource, the qualified archaeologist shall prepare an Evaluation Plan.”	Rationale: Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age. SCE recommends the following edits: “Determination if a resource is an historical resource. The CPUC-approved cultural resources specialist/qualified archaeologist <u>and</u> <u>SCE</u> , in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historical <u>resource</u> , the qualified archaeologist <u>and</u> <u>SCE</u> shall prepare an Evaluation Plan.”	D2-128

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Section	Page	DEIR Language	SCE Recommended Language
4.4.4	4.4-30 Lines 32-48	<p>“Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the historic resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan shall describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an historic resource. If the discovery is not found to be an historic resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an historic resource, SCE shall prepare a Data Recovery Plan.”</p>	<p>Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age</p> <p>SCE recommends the following edits: “Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the <u>historical</u> resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan shall describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an <u>historical</u> resource. If the discovery is not found to be an <u>historical</u> resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an <u>historical</u> resource, SCE shall prepare a Data Recovery Plan.”</p>
4.4.4	4.4-31 Lines 1-12	<p>“Data Recovery Plan. Data Recovery Plans for historic resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section 21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods, samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it an historic resource, and reporting procedure. This plan shall be submitted to the CPUC for review and approval. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared.”</p>	<p>Rationale: Please change “historic” to “historical” to clarify a historical resource per CEQA Guidelines (PRC 21084.1., Section 15064.5) rather than a resource of historical age</p> <p>SCE recommends the following edits: “Data Recovery Plan. Data Recovery Plans for <u>historical</u> resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section 21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods, samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it an <u>historical</u> resource, and reporting procedure. This plan shall be submitted to the CPUC for review and approval. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared.”</p>
4.4.4	4.4-31 Lines 35-40	<p>“MM CR-4: Paleontological Resources Monitoring. Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor all ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-7.”</p>	<p>Rationale: Please remove “all” to be consistent with language for MM CR-4 as described on page 4.4-28 Lines 19-22, which does not specify that all ground-disturbing activities within areas of moderate to high potential for paleontological resources will be monitored. Please include reference to the Paleontological Resource Management Plan (PRMP), which will provide details about monitoring and discovery protocols. The PRMP will be reviewed and approved by</p>

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			<p>the CPUC prior to the start of construction.</p> <p>SCE recommends the following edits:</p> <p>“MM CR-4: Paleontological Resources Monitoring. Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor all ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources, per the Paleontological Resources Management Plan (APM-CUL-01) reviewed and approved by the CPUC prior to of construction. The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-75.”</p>
4.4.4	4.4-31 Lines 42-46	<p>“MM CR-5: Follow Paleontological Resource Discovery Protocol. In the case that a previously unknown paleontological resource is discovered during construction activities, all work within 15 meters of the resource shall be stopped, and the CPUC-approved paleontologist shall determine whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.”</p>	<p>Rationale:</p> <p>Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively.</p> <p>SCE recommends the following edits:</p> <p>“MM CR-5: Follow Paleontological Resource Discovery Protocol. In the case that a previously unknown paleontological resource is discovered during construction activities, all work within 15 meters of the resource shall be stopped, and the CPUC-approved paleontologist shall <u>consult with the applicant</u> to determine whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.”</p>
4.4.4	4.4-32 Lines 15-21	<p>“If the resource is unique, then work shall remain stopped, and the approved paleontologist shall consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist determines that another method would provide superior mitigation of impacts to the resource.”</p>	<p>Rationale:</p> <p>Please include involvement of SCE, as SCE is responsible for ensuring the mitigation measures are implemented effectively. Reference to the cultural resources specialist/qualified archaeologist appears to be a typo.</p> <p>SCE recommends the following edits:</p> <p>“If the resource is unique, then work shall remain stopped, and the approved paleontologist shall consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist <u>paleontologist in consultation with the applicant</u> determines that another method would provide superior mitigation of impacts to the resource.”</p>
GEOLOGY			
4.5.2.1	4.5-19 Lines 41-49	<p>“As authorized by Section 402 of the Clean Water Act, the California State Water Resources Control Board administers the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (General Construction Activity NPDES Storm Water Permit, 2009-0009-</p>	<p>Rationale:</p> <p>Please modify to make consistent with Hydrology and Water Quality analysis.</p>

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		DWQ and 2010-0014-DWQ) that covers a variety of construction activities that could result in wastewater discharges. Under this General Permit, the state issues a construction permit for projects that disturb more than 1 acre of land.”	SCE recommends the following edits: “As authorized by Section 402 of the Clean Water Act, the California State Water Resources Control Board administers the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (General Construction Activity NPDES Storm Water Permit, 2009-0009-DWQ and 2010-0014-DWQ DWQ and 2012-0006-DWQ)) that covers a variety of construction activities that could result in wastewater discharges. Under this General Permit, the state issues a construction permit for projects that disturb more than 1 acre <u>or more</u> of land.”	D2-134 cont.
GREENHOUSE GASSES				
4.6.2.1	4.6-6 Lines 6-8	“The Final GHG Tailoring Rule, established in May 2010, sets thresholds for GHG emissions that define when permits under the New Source Review, Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.”	Rationale: Please update language to clarify the agency responsible for implementation of ruling added in EPA. SCE recommends the following edits: “The Final GHG Tailoring Rule, established <u>by the EPA</u> in May 2010, sets thresholds for GHG emissions that define when permits under the New Source Review, Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.”	D2-135
Table 4.6-5	4.6-14	“EO S-01-07—Low Carbon Fuel Standard Fuels purchased for the project would be required to comply with the Low Carbon Fuel Standard.”	Rationale: Please delete this row in the Table as it is not a Plan, Policy or Regulation. It is a measure of AB32 which is already listed. The narrative for AB32 specifically mentions Low Carbon Fuel Standard. SCE recommends the following edits: “ EO S-01-07—Low Carbon Fuel Standard Fuels purchased for the project would be required to comply with the Low Carbon Fuel Standard. ”	D2-136
HAZARDS				
4.7.2.1	4.7-16 Lines 27-28	“A RCRA-regulated hazardous waste exhibits at least one of four characteristics: ignitability, corrosivity, reactivity, or toxicity.”	Rationale: Please update RCRA Hazardous Waste description to make complete. SCE recommends the following edits: “A RCRA-regulated hazardous waste <u>is either found on a pre-determined list or</u> exhibits at least one of four characteristics: ignitability, corrosivity, reactivity, or toxicity.”	D2-137
4.7.2.3	4.7-25	“It is anticipated that these poles would either be reused or disposed of at Savage Canyon Landfill,	Rationale:	D2-138

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

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			<p>SCE recommends the following edits:</p> <p>“MM HY-1 requires the applicant to apply to the State Water Resources Control Board (SWRCB) for coverage under the NPDES Construction General Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP) for the SWRCB’s review and approval.”</p>	D2-142 cont.
4.7.3.3	4.7-33 Lines 35-36	“Impacts would be less than significant with implementation of MM HZ-1, MM HZ-2, MM HZ-3, and MM HY-1.”	<p>Rationale:</p> <p>Please update language to include specific plans and measures used to make the significance determination, based on comments above where compliance with existing laws and regulations is required.</p> <p>SCE recommends the following edits:</p> <p>“Impacts would be less than significant with implementation of MM HZ-1, MM HZ-2, MM HZ-3, and MM HY-1 an HMBP, SPCC Plan, SWPPP, and MM HZ-2.”</p>	D2-143
4.7.3.3	4.7-34 Line 20	“MM HZ-3 requires preparation and implementation of an SPCC plan.”	<p>Rationale:</p> <p>Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed.</p> <p>SCE recommends the following edits:</p> <p>MM HZ-3 requires preparation <u>In compliance with regulatory requirements SCE will prepare and implementation of an SPCC plan.</u></p>	D2-144
4.7.3.3	4.7-34 Lines 30-32	“Therefore, MM HZ-4 would require that the applicant prepare a Contaminated Soil Contingency Plan, which would be implemented if contaminated soils are uncovered during earth-moving activities.”	<p>Rationale:</p> <p>Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed.</p> <p>SCE recommends the following edits:</p> <p>“Therefore, MM HZ-4 would require that <u>In compliance with regulatory requirements described in section 4.7.2.2 the applicant will prepare a Contaminated Soil Contingency Plan, which would be implemented if contaminated soils are uncovered during earth-moving activities.”</u></p>	D2-145
4.7.3.3	4.7-34 Lines 44-46	“MM HY-2 outlines requirements that SCE must follow for disposal of contaminated groundwater. Implementation of MM HY-2 would reduce impacts to less than significant.”	<p>Rationale:</p> <p>Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed.</p> <p>SCE recommends the following edits:</p> <p>“MM HY-2 The regulatory requirements described in section 4.8.2.2 outlines requirements that SCE must follow for disposal of contaminated groundwater. Implementation of MM HY-2 would <u>Compliance with those regulations will reduce impacts to less than significant.”</u></p>	D2-146
4.7.3.3	4.7-35	“As stated previously, MM HZ-4 would be implemented in the event that contaminated soil is	<p>Rationale:</p>	D2-147

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	Lines 31-32	encountered and would reduce impacts to less than significant.”	<p>Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed.</p> <p>SCE recommends the following edits:</p> <p>“As stated previously, MM HZ-4 would be implemented in the event that contaminated soil is encountered <u>SCE would comply with regulatory requirements</u> and would reduce impacts to less than significant.”</p>
4.7.3.3	4.7-37 Lines 11-18	“The applicant would prepare and implement a Soil Management Plan in accordance with MM HZ-4, which would include precautionary measures and methods for handling potentially contaminated soils at all site areas that involve excavation activities. MM HZ-4 further identifies appropriate measures that must be followed in the event of this unanticipated discovery, including soil sampling, collection, and analysis to determine the appropriate disposal and treatment options, as well as cleanup or avoidance, as appropriate. Implementation of MM HZ-4 in the event of a discovery would reduce potential hazards to the public or the environment to less than significant.”	<p>Rationale:</p> <p>Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed.</p> <p>SCE recommends the following edits:</p> <p>“The applicant would prepare and implement a Soil Management Plan in accordance with MM HZ-4<u>regulatory requirements</u>, which would include precautionary measures and methods for handling potentially contaminated soils at all site areas that involve excavation activities. MM HZ-4 further identifies appropriate measures that must be followed in the event of this unanticipated discovery, including soil sampling, collection, and analysis to determine the appropriate disposal and treatment options, as well as cleanup or avoidance, as appropriate. <u>Implementation of MM HZ-4</u> i<u>n</u> the event of a discovery, <u>compliance with regulatory requirements</u> would reduce potential hazards to the public or the environment to less than significant.”</p>
4.7.4	4.7-39 Lines 3-14	<p>“MM HZ-1: Hazardous Materials Business Plan. A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on:</p> <ul style="list-style-type: none"> • Hazardous materials stored at the Mesa Substation over threshold quantities. • A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points. • Emergency response plans for release and threatened release of the covered materials. <p>The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.”</p>	<p>Rationale:</p> <p>Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. In the event that the mitigation measure is not removed, please modify language to reflect SCE’s submittal process for HMBPs.</p> <p>SCE recommends the following edits:</p> <p>“MM HZ-1: Hazardous Materials Business Plan. A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on:</p> <ul style="list-style-type: none"> • Hazardous materials stored at the Mesa Substation over threshold quantities. • A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points. • Emergency response plans for release and threatened release of the covered materials. <p><u>The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.</u></p> <p>or</p> <p><u>The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.</u></p> <p><u>The HMBP must be submitted at least 30 days prior to storage of covered hazardous materials via the California</u></p>

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			Environmental Reporting System (CERS). A receipt, showing that the agency received the Plan, must be submitted to the CPUC prior to storage of covered hazardous materials.”
4.7.4	4.7-39 Lines 16-34	<p>“MM HZ-2: Hazardous Materials Training. Prior to construction, the applicant will prepare and implement a worker environmental awareness program (WEAP) for CPUC review and approval that includes:</p> <ul style="list-style-type: none"> • Instruction regarding the location of Material Safety Data Sheets, as well as proper labeling, storage, use, transport, and disposal of hazardous materials. • Information on common contaminants that could be uncovered in the proposed project area and instruction regarding appropriate procedures if potentially contaminated soil is present. • Procedures for spill response under the SPCC (MM HZ-3) including notification to appropriate personnel, including the Spill Response Coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination. • Instruction on individual responsibilities under the Clean Water Act, the project SPCC, the project SWPPP, and site-specific BMPs. • Instruction on compliance with OSHA regulations and procedures if landfill gas is encountered during excavations. <p>The applicant will maintain records documenting attendees at each training.”</p>	<p>Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed.</p> <p>SCE recommends the following edits:</p> <p>“MM HZ-2: Hazardous Materials Training. Prior to construction, the applicant will prepare and implement a worker environmental awareness program (WEAP) for CPUC review and approval that includes:</p> <ul style="list-style-type: none"> • Instruction regarding the location of Material Safety Data Sheets, as well as proper labeling, storage, use, transport, and disposal of hazardous materials. • Information on common contaminants that could be uncovered in the proposed project area and instruction regarding appropriate procedures if potentially contaminated soil is present. • Procedures for spill response <u>will be in compliance with existing laws and regulations</u> under the SPCC (MM HZ-3) including notification to appropriate personnel, including the Spill Response Coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination. • Instruction on individual responsibilities under the Clean Water Act, the project SPCC, the project SWPPP, and site-specific BMPs. • Instruction on compliance with OSHA regulations and procedures if landfill gas is encountered during excavations. <p>The applicant will maintain records documenting attendees at each training.”</p>
4.7.4	4.7-39 Lines 36-41	<p>“MM HZ-3: Spill Prevention, Control, and Countermeasure Plan. SCE shall prepare a site-specific SPCC plan that identifies spill response and prevention measures and BMPs. SCE shall indicate site specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction for review and approval.”</p>	<p>Rationale: Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. In the event that the mitigation measure is not removed, please modify language to reflect SCE’s submittal process for SPCC.</p> <p>SCE recommends the following edits:</p> <p>“MM HZ-3: Spill Prevention, Control, and Countermeasure Plan. SCE shall prepare a site-specific SPCC plan that identifies spill response and prevention measures and BMPs. SCE shall indicate site specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction for review and approval.”</p> <p>Or</p>

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			“SCE shall submit the SPCC to CPUC at least 30 days prior to construction <u>delivery of any additional transformer oil to the site for review and approval.</u> ”	D2-151 cont.
HYDROLOGY AND WATER QUALITY				
4.8.1.3	4.8-5 Line 40	“Figure 4.8-3”	<p>Rationale: Please correct typographical error referencing the incorrect figure number.</p> <p>SCE recommends the following edits: “Figure 4.8.<u>3</u>2”</p>	D2-152
4.8	4.8-6 Lines 33-41	“The Mesa Substation site is in an inundation area for the Garvey Reservoir if the south dam fails. Flood depths would be 6 to 7 feet. From there, water would come up against State Route 61 and then eventually flow through freeway undercrossings (City of Monterey Park 2001). Staging Yard 5 and structure replacement in the City of Commerce are also in the Garvey Reservoir inundation zone, but farther from the reservoir itself. Floodwaters would reach the City within 15 minutes (City of Commerce 2008). Staging Yard 6 is in the inundation area of the Garvey Reservoir should the north dam fail (City of Rosemead 2010; City of Monterey Park 2001). The average water depth would be about 5 feet (City of Monterey Park 2001). The Garvey Reservoir was repaired in 1999 to fix seepage and to increase the integrity of the reservoir (City of Monterey Park 2001).”	<p>Rationale: SCE has reviewed the City of Monterey Park General Plan (2001) section related to the potential failure of the north and south dams surrounding the MWD Garvey Reservoir, including Figure SCS-4, which clearly shows that the Main Project Area is not within any inundation area. Please modify impact analysis as shown below and eliminate mitigation measure MM HY-6.</p> <p>SCE recommends the following edits: “The Mesa Substation site is <u>not</u> in an inundation area for the Garvey Reservoir if the south dam fails. Flood depths would be 6 to 7 feet. From there, water would come up against State Route 61 and then eventually flow through freeway undercrossings (City of Monterey Park 2001, <u>Figure SCS-4</u>). Staging Yard 5 and structure replacement in the City of Commerce are also in the Garvey Reservoir inundation zone, but farther from the reservoir itself. Floodwaters would reach the City within 15 minutes (City of Commerce 2008). Staging Yard 6 is in the inundation area of the Garvey Reservoir should the north dam fail (City of Rosemead 2010; City of Monterey Park 2001). The average water depth would be about 5 feet (City of Monterey Park 2001). The Garvey Reservoir was repaired in 1999 to fix see page and to increase the integrity of the reservoir (City of Monterey Park 2001).”</p>	D2-153
4.8.1.3	4.8-6 Lines 6-11	“Under section 303(d) of the Clean Water Act, states identify water bodies as impaired for certain pollutants. The only listed water body in the vicinity of the project area is Legg Lake, which is located 0.2 mile northeast of Staging Area 7 and about .02 mile north of Telecommunications Route 3.”	<p>Rationale: Please correct distance and direction of Legg Lake as related to the Proposed Project.</p> <p>SCE recommends the following edits: Under section 303(d) of the Clean Water Act, states identify water bodies as impaired for certain pollutants. The only listed water body in the vicinity of the project area is Legg Lake, which is “located 0.2 mile northeast <u>southwest</u> of Staging Area 7 and about .02<u>0.1</u> mile north of Telecommunications Route 3.</p>	D2-154
4.8.1.3	4.8-6 Lines	“The Mesa Substation site is in an inundation area for the Garvey Reservoir if the south dam fails. Flood depths would be 6 to 7 feet. From there, water would come up against State Route 61 and...”	<p>Rationale:</p>	D2-155

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Section	Page	DEIR Language	SCE Recommended Language	
	33-34		<p>Please correct typographical error to indicate proper State Route number.</p> <p>SCE recommends the following edits:</p> <p>“The Mesa Substation site is in an inundation area for the Garvey Reservoir if the south dam fails. Flood depths would be 6 to 7 feet. From there, water would come up against State Route 640 and...”</p>	D2-155 cont.
4.8.2.1	4.8-12 Lines 6-14	<p>“As authorized by Section 402 of the CWA, the SWRCB administers the statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (NPDES Permit, 2009-0009-DWQ and 2010-0014-DWQ) that covers a variety of construction activities that could result in wastewater discharges. Under this system, the state grants coverage under the Construction General Permit for projects that disturb more than one acre of land. The SWRCB Construction General Permit process involves the notification of the construction activity by providing a Notice of Intent to the SWRCB, the development of a Stormwater Pollution Prevention Plan (SWPPP), and the implementation of water quality monitoring activities if needed. The purpose of a SWPPP is to:”</p>	<p>Rationale:</p> <p>Please update to include permit amendment.</p> <p>SCE recommends the following edits:</p> <p>“As authorized by Section 402 of the CWA, the SWRCB administers the statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (NPDES Permit, 2009-0009-DWQ as amended by <u>and 2010-0014-DWQ and 2012-0006-DWQ</u>) that <u>which</u> covers a variety of construction activities that could result in wastewater discharges. Under this system, the state grants coverage under the Construction General Permit for projects that disturb more than <u>one acre or more of</u> land. The SWRCB Construction General Permit process involves the notification of the construction activity by providing a Notice of Intent to the SWRCB, the development of a <u>Storm W</u>ater Pollution Prevention Plan (SWPPP), and the implementation of water quality monitoring activities if needed. The purpose of a SWPPP is to:”</p>	D2-156
4.8.2.1	4.8-12 Lines 24-29	<p>“Identify a sampling and analysis strategy and sampling schedule for discharges from construction activity that discharge directly to a water body listed for impairment due to sedimentation, in accordance with CWA Section 303(d); and</p> <p>Identify a sampling and analysis strategy and sampling schedule for discharges that have been discovered through visual monitoring to be potentially contaminated by pollutants not visually detectable in the runoff.”</p>	<p>Rationale:</p> <p>Sampling requirements are dependent upon the risk level, or type of project. This risk level and type are determined by both sediment and receiving water risk. If the risk level, or type, are determined to be a level or type one, sampling will not be required unless a non-storm water discharge occurs and cannot be properly cleaned up prior to a rain event.</p> <p>SCE recommends the following edits:</p> <p>“Identify a sampling and analysis strategy and sampling schedule for discharges from construction activity <u>in compliance with the requirements of the Construction General Permit that discharge directly to a water body listed for impairment due to sedimentation, in accordance with CWA Section 303(d); and</u></p> <p>Identify a sampling and analysis strategy and sampling schedule for discharges that have been discovered through visual monitoring to be potentially contaminated by pollutants not visually detectable in the runoff.”</p>	D2-157
4.8.2.1	4.8-13	Missing Section language.	<p>Rationale:</p> <p>Please include a narrative to include 404 permit.</p>	D2-158

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

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

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	31-32	the detention basin.”	<p>Please eliminate this language per the current construction plan. The detention basin is expected to be constructed during Phase 1.</p> <p>SCE recommends the following edits: “Increases in runoff water could cause significant erosion during Phase 1, prior to construction of the detention basin.”</p>	D2-163 cont.
4.8	4.8-20 Line 30	“Phase 2”	<p>Rationale: Please correct this language per the current construction plan. The detention basin is expected to be constructed during Phase 1.</p> <p>SCE recommends the following edits: “Phase 2”</p>	D2-164
4.8	4.8-22 Line 15	“Phase 2”	<p>Rationale: Please correct this language per the current construction plan. The detention basin is expected to be constructed during Phase 1.</p> <p>SCE recommends the following edits: “Phase 2”</p>	D2-165
4.8	4.8-22 Lines 28-16- 17	“Increases in runoff water could cause significant erosion during Phase 1, prior to construction of the detention basin.”	<p>Rationale: Please eliminate this language per the current construction plan. The detention basin is expected to be constructed during Phase 1.</p> <p>SCE recommends the following edits: “Increases in runoff water could cause significant erosion during Phase 1, prior to construction of the detention basin.”</p>	D2-166
4.8	4.8-22 Lines 28-31	<p>Line 28: “construct a retention basin...”</p> <p>Line 31: “...runoff to the retention basin.”</p>	<p>Rationale: Correct typographical error referring a “detention” basin as a “retention” basin, which are different from each other.</p> <p>SCE recommends the following edits: Line 28: “construct a <u>detention</u> retention basin...” Line 31: “...runoff to the <u>detention</u> retention basin.”</p>	D2-167

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

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			Yards 1, 2 and 3 would <u>not</u> be located within the inundation area of the Garvey Reservoir should the south dam fail. A-Also, a failure of the Garvey Reservoir south dam is unlikely during construction and. Although the proposed project would not exacerbate the existing flood conditions, a dam failure when workers are present, however, could result in significant impacts due to the close proximity of the dam. MM HY 5 would be implemented to require training on an evacuation route in the event of a dam failure. Impacts would be less than significant after mitigation.
4.8.3.3	4.8-27 Lines 16-33	<p>“Operation and Maintenance Main Project Area</p> <p>The Mesa Substation and nearby telecommunications, transmission, subtransmission, and distribution infrastructure would be located in the inundation area of the Garvey Reservoir. The total number of telecommunications, transmission, subtransmission, and distribution structures in the inundation zone would be reduced as a result of the proposed project. Thus, there would be no adverse impact related to structures in a dam inundation area with regards to transmission, subtransmission, and distribution structures. A dam failure is a very low probability event, given that repairs were conducted in 1999, and the proposed project would not exacerbate the existing conditions. However, impacts to the substation in the event of a dam failure could be catastrophic, including potentially widespread outages and severe damage to substation equipment. This would be a significant impact. MM HY-6 would be implemented.”</p>	<p>Rationale:</p> <p>Please modify language. This is based on SCE’s review of the City of Monterey Park General Plan (2001) section related to the potential failure of the north and south dams surrounding the MWD Garvey Reservoir. This is depicted in Figure SCS-4, which shows that the Main Project Area is not within any inundation area.</p> <p>SCE recommends the following edits:</p> <p>“Operation and Maintenance Main Project Area</p> <p>The Mesa Substation and nearby telecommunications, transmission, subtransmission, and distribution infrastructure would <u>not</u> be located in the inundation area of the Garvey Reservoir. The total number of telecommunications, transmission, subtransmission, and distribution structures in the inundation zone would be reduced as a result of the proposed project. Thus, there would be no adverse impact related to structures in a dam inundation area with regards to transmission, subtransmission, and distribution structures. A dam failure is a very low probability event, given that repairs were conducted in 1999, and the proposed project would not exacerbate the existing conditions. <u>Impacts would be less than significant.</u> However, impacts to the substation in the event of a dam failure could be catastrophic, including potentially widespread outages and severe damage to substation equipment. This would be a significant impact. MM HY-6 would be implemented.”</p>
4.8.4	4.8-28 and 4.8-29 Lines 21-48 And 1-13	<p>“MM HY-1: Stormwater Pollution Prevention Plan. The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats. • If visible dust is present during construction activities, standard dust suppression techniques (e.g., water spraying) will be used in all ground disturbance areas. • During construction activities, measures would be in place to ensure that contaminants are not discharged from construction sites. The SWPPP would define areas where hazardous materials and trash would be stored; where vehicles would be parked, fueled and serviced; and where construction materials would be stored. • Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures will be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent 	<p>Rationale:</p> <p>Compliance with the Clean Water Act, including SWRCB-issued Construction General Permits is required. Therefore, a mitigation measure is not required.</p> <p>SCE recommends the following edits:</p> <p>“MM HY-1: Stormwater Pollution Prevention Plan. The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats. • If visible dust is present during construction activities, standard dust suppression techniques (e.g., water spraying) will be used in all ground disturbance areas.

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		<p>properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities.</p> <ul style="list-style-type: none"> Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, these maintenance activities shall be performed at least 150 feet from all aquatic resources or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials would be cleaned up immediately and contaminated soils removed to approved disposal areas. Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. <p>Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction.”</p>	<p>• During construction activities, measures would be in place to ensure that contaminants are not discharged from construction sites. The SWPPP would define areas where hazardous materials and trash would be stored; where vehicles would be parked, fueled and serviced; and where construction materials would be stored.</p> <p>• Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures will be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities.</p> <p>• Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, these maintenance activities shall be performed at least 150 feet from all aquatic resources or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project related spills of hazardous materials would be cleaned up immediately and contaminated soils removed to approved disposal areas.</p> <p>• Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system</p> <p>• Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems.</p> <p>Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction.”</p>
4.8.4	4.8-28 and 4.8-29 Lines 35-48 and 1-13	<p>“• Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures will be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities.</p> <ul style="list-style-type: none"> Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, these maintenance activities shall be performed at least 150 feet from all aquatic resources or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials would be cleaned up immediately and contaminated soils removed to approved disposal areas. Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and 	<p>Rationale:</p> <p>In the event that the MM HY-1 is not removed as requested. Please modify the language as follows.</p> <p>SCE recommends the following edits:</p> <p>“• Runoff, sedimentation, and erosion <u>control measures would be implemented in compliance with the Storm Water Pollution Prevention Plan (SWPPP) which contains the Best Management Practices (BMPS) that would be implemented to prevent and control sedimentation and erosion during construction and to protect storm water runoff. The SWPPP will be site-specific and prepared in compliance with the Construction General Permit.</u> would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures will be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities.</p>

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		<p>cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system</p> <ul style="list-style-type: none"> Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. <p>Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction.”</p>	<ul style="list-style-type: none"> Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, these maintenance activities shall be performed at least 150 feet <u>50 feet, if feasible,</u> from all aquatic resources or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials would be cleaned up immediately and contaminated soils removed to approved disposal areas. Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. <p>Verification of Construction General Permit coverage <u>obtained from the State Water Resources Control Board (SWRCB) approval and the approved SWPPP(s)</u> will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. <u>The SWPPP will be kept onsite and will be made available upon Updated SWPPPs will be provided to the CPUC on request during construction.</u>”</p>
4.8.4	4.8-29 Lines 39-40	“SCE shall submit the plan to Monterey Park and CPUC for review and approval prior to beginning construction activities at the substation site.”	<p>Rationale:</p> <p>An “Erosion Control Plan” is required to be submitted to the City for their review and approval as part of the overall Grading Permit process. Also, construction drainage issues are managed through the SWPPP process, which also requires SWRCB approvals. As a result, SCE will ensure that the CPUC will receive copies of approved plans.</p> <p>The Drainage Plan is reviewed/approved by the city as part of grading design review process. Please remove CPUC as a reviewing entity.</p> <p>SCE recommends the following edits:</p> <p>“SCE shall submit the plan to Monterey Park and CPUC for review and approval prior to beginning construction activities at the substation site. <u>SCE will provide a copy of the grading permit to the CPUC.</u>”</p>
4.8.4	4.8-29 Lines 42-47	“SCE shall design the detention basin on the proposed Mesa Substation site in accordance with the Los Angeles County Department of Public Works Hydrology Manual (LACDPW2006). The Hydrology Manual contains techniques to calculate runoff flow rates and volumes based on Los Angeles County’s historic precipitation and runoff. As applicable, the detention basin shall be designed in accordance with the Los Angeles County Department of Public Works Low Impact Development Standards Manual (LACDPW2014).”	<p>Rationale:</p> <p>Please update text to reflect the correct agency oversight.</p> <p>SCE recommends the following edits:</p> <p>“SCE shall design the detention basin on the proposed Mesa Substation site in accordance with the <u>City of Monterey Park requirements</u> Los Angeles County Department of Public Works Hydrology Manual”</p>

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			(LACDPW2006). The Hydrology Manual contains techniques to calculate runoff flow rates and volumes based on Los Angeles County’s historic precipitation and runoff. As applicable, the detention basin shall be designed in accordance with the <u>City of Monterey Park requirements</u> . <u>Los Angeles County Department of Public Works Low Impact Development Standards Manual (LACDPW2014).</u> ”
4.8.4	4.8-30 Lines 7-14	<p>“MM HY-6: Dam Inundation Substation Protection. SCE shall incorporate dam inundation measures into its substation at the design phase to reduce the potential for widespread outages and equipment damages in the event of failure of the south dam at Garvey Reservoir. Measures could include:</p> <ul style="list-style-type: none"> • Concrete perimeter wall and flood gates at entry ways; • Elevation of key substation equipment above inundation levels; or • Sealing of equipment buildings.” 	<p>Rationale:</p> <p>Please eliminate MM HY-6. This is based on SCE’s review of the City of Monterey Park General Plan (2001) section related to the potential failure of the north and south dams surrounding the MWD Garvey Reservoir. This is depicted in Figure SCS-4, which shows that the Main Project Area is not within any inundation area. MWD has concurred with SCE’s analysis.</p> <p>SCE recommends the following edits:</p> <p>“MM HY-6: Dam Inundation Substation Protection. SCE shall incorporate dam inundation measures into its substation at the design phase to reduce the potential for widespread outages and equipment damages in the event of failure of the south dam at Garvey Reservoir. Measures could include:</p> <ul style="list-style-type: none"> • Concrete perimeter wall and flood gates at entry ways; • Elevation of key substation equipment above inundation levels; or • Sealing of equipment buildings.”
NOISE			
4.10.3.3	4.10-21 Lines 22-25 and Line 41	<p>Lines 22-25</p> <p>“There are residences within 500 feet of the construction area for structure replacement and telecommunications routing. Staging Yard 4 is also located within 500 feet of a residential area and may be used for helicopter landing and takeoff.”</p> <p>Line 41</p> <p>“Helicopter use at Staging Yard 4 would produce noise levels of up to 97 dBA at 100 feet. Construction-related noise associated with the proposed project would exceed the noise limits set forth in the City of Pasadena’s noise ordinance as a result of construction occurring outside of the allowed construction hours and as a result of helicopter landing activities at Staging Yard 4. This would be a significant impact. Noise reduction mitigation measures would not be effective at reducing helicopter noise within 100 feet, since the helicopters would produce noise when airborne and landing, where noise barriers would be ineffective. Impacts would be significant and unavoidable.”</p>	<p>Rationale:</p> <p>Helicopter use was not called out in the PEA for conductor installation at Goodrich substation, and is still not expected as of the date of this submittal.</p> <p>SCE recommends the following edits:</p> <p>Lines 22-25</p> <p>“There are residences within 500 feet of the construction area for structure replacement and telecommunications routing. Staging Yard 4 is also located within 500 feet of a residential area and may be used for helicopter landing and takeoff.”</p> <p>Line 41-48</p> <p>“Helicopter use at Staging Yard 4 would produce noise levels of up to 97 dBA at 100 feet. Construction related noise associated with the proposed project would exceed the noise limits set forth in the City of Pasadena’s noise ordinance as a result of construction occurring outside of the allowed construction hours and as a result of helicopter landing activities at Staging Yard 4. This would be a significant impact. Noise reduction mitigation</p>

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Section	Page	DEIR Language	SCE Recommended Language																																																																						
			measures would not be effective at reducing helicopter noise within 100 feet, since the helicopters would produce noise when airborne and landing, where noise barriers would be ineffective. Impacts would be significant and unavoidable.”																																																																						
4.10.3.3	4.10-28 Line 12	“Helicopters would take off and land at Staging Yards 1 through 4.”	<p>Rationale:</p> <p>Please update language to reflect the yards that could potentially be used for helicopter operations.</p> <p>SCE recommends the following edits:</p> <p>“Helicopters would <u>potentially</u> take off and land at Staging Yards 1 through <u>3</u>4.”</p>																																																																						
Table 4.10-19	4.10-28	<p>Table 4.10-19 Helicopter Takeoff and Landing Impacts</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr> <th>Staging Yard</th> <th>Closest Sensitive Receptor⁽¹⁾</th> <th>Estimated Existing Noise Level at Closest Receptor</th> <th>Helicopter Takeoff and Landing Impact (dBA)</th> <th>Increase in dBA</th> <th>Threshold (Increase in dBA)</th> <th>Significant?</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>550 feet (homes on Holly Oak Drive)</td> <td>52⁽²⁾</td> <td>82</td> <td>30</td> <td>10</td> <td>Yes</td> </tr> <tr> <td>2</td> <td>300 feet (homes on North Vail Avenue)</td> <td>62⁽³⁾</td> <td>87</td> <td>25</td> <td>10</td> <td>Yes</td> </tr> <tr> <td>3</td> <td>840 feet (apartments on Neil Armstrong Street)</td> <td>55⁽⁴⁾</td> <td>79</td> <td>24</td> <td>10</td> <td>Yes</td> </tr> <tr> <td>4</td> <td>170 feet (residences on Eaton Drive)</td> <td>60⁽⁵⁾</td> <td>92</td> <td>32</td> <td>10</td> <td>Yes</td> </tr> </tbody> </table>	Staging Yard	Closest Sensitive Receptor ⁽¹⁾	Estimated Existing Noise Level at Closest Receptor	Helicopter Takeoff and Landing Impact (dBA)	Increase in dBA	Threshold (Increase in dBA)	Significant?	1	550 feet (homes on Holly Oak Drive)	52 ⁽²⁾	82	30	10	Yes	2	300 feet (homes on North Vail Avenue)	62 ⁽³⁾	87	25	10	Yes	3	840 feet (apartments on Neil Armstrong Street)	55 ⁽⁴⁾	79	24	10	Yes	4	170 feet (residences on Eaton Drive)	60 ⁽⁵⁾	92	32	10	Yes	<p>Rationale:</p> <p>Please modify table by deleting the last row since this yard will not have helicopter operations.</p> <p>SCE recommends the following edits:</p> <p>Table 4.10-19 Helicopter Takeoff and Landing Impacts</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Staging Yard</th> <th>Closest Sensitive Receptor⁽¹⁾</th> <th>Estimated Existing Noise Level at Closest Receptor</th> <th>Helicopter Takeoff and Landing Impact (dBA)</th> <th>Increase in dBA</th> <th>Threshold (Increase in dBA)</th> <th>Significant?</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>550 feet (homes on Holly Oak Drive)</td> <td>52⁽²⁾</td> <td>82</td> <td>30</td> <td>10</td> <td>Yes</td> </tr> <tr> <td>2</td> <td>300 feet (homes on North Vail Avenue)</td> <td>62⁽³⁾</td> <td>87</td> <td>25</td> <td>10</td> <td>Yes</td> </tr> <tr> <td>3</td> <td>840 feet (apartments on Neil Armstrong Street)</td> <td>55⁽⁴⁾</td> <td>79</td> <td>24</td> <td>10</td> <td>Yes</td> </tr> <tr style="border-top: 2px solid black;"> <td>4</td> <td>170 feet (residences on Eaton Drive)</td> <td>60⁽⁵⁾</td> <td>92</td> <td>32</td> <td>10</td> <td>Yes</td> </tr> </tbody> </table>	Staging Yard	Closest Sensitive Receptor ⁽¹⁾	Estimated Existing Noise Level at Closest Receptor	Helicopter Takeoff and Landing Impact (dBA)	Increase in dBA	Threshold (Increase in dBA)	Significant?	1	550 feet (homes on Holly Oak Drive)	52 ⁽²⁾	82	30	10	Yes	2	300 feet (homes on North Vail Avenue)	62 ⁽³⁾	87	25	10	Yes	3	840 feet (apartments on Neil Armstrong Street)	55 ⁽⁴⁾	79	24	10	Yes	4	170 feet (residences on Eaton Drive)	60⁽⁵⁾	92	32	10	Yes
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4.10.4	4.10-31 and 4.10-32 Lines 27-46 and 1-31	<p>“MM NV-1: Noise Control Plan. Prior to the start of construction, the applicant shall prepare a Noise Control Plan to ensure that project construction noise does not:</p> <ul style="list-style-type: none"> • Increase ambient noise levels by more than 10 dBA (8-hour L_{eq}), or • Exceed the noise level specified in the applicable jurisdiction’s noise ordinance. <p>The Noise Control Plan measures shall be selected based on equipment used and activity conducted in specific locations, once known. The applicant shall submit the Noise Control Plan to the CPUC at</p>	<p>Rationale:</p> <p>The first bullet standard (reduction of noise levels by 10 dB) applies to operations and is not applicable to construction noise. SCE recommends striking the second bullet standard (instituting measures to meet the jurisdiction’s noise standards) because it is not achievable. SCE has provided references to “noise reduction” instead in the recommended edits below. The DEIR analysis states that even with the implementation of MM NS-1, the impact at several locations will be significant and unavoidable, and noise will exceed some local jurisdictions’ standards. SCE recommends making the list of measures to be included in the plan less prescriptive. Please revise to allow SCE the flexibility to implement measures that will help reduce noise impacts, given specific equipment</p>																																																																						

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		<p>least 30 days prior to the start of construction for review and approval. The Noise Control Plan shall include, but not be limited to, the following noise reduction and control measures:</p> <ul style="list-style-type: none"> • Temporarily install and maintain an absorptive noise control barrier in the perimeter of construction sites located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers and ensure such barriers are installed in a safely manner. • Limit heavy equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity. • Ensure that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition. • Maintain construction equipment according to manufacturer recommendations. • Minimize construction equipment idling. • Reduce noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimizes the need for back-up alarms and use flagmen to minimize the time needed to back up vehicles. • When possible, use construction equipment specifically designed for low noise emissions (i.e., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines). Electric engines have been reported to have lower noise levels than internal combustion engines. • Where practical, locate stationary equipment such as compressors, generators, and welding machines away from sensitive receptors or behind barriers. <p>The Noise Control Plan shall detail the frequency, location, and methodology for noise monitoring prior to and during various construction and restoration activities to ensure that generated noise levels do not exceed 10 dBA above existing ambient noise levels, or the applicable jurisdiction noise standards. The Noise Control Plan shall detail the actions and procedures that the applicant shall implement to mitigate impacts in the event that monitoring detects noise levels that have exceeded the criteria specified in this EIR. Noise level measurements shall be conducted in compliance with the City of Monterrey Park, City of Montebello, City of Commerce, City of Bell Gardens, City of Pasadena, and Los Angeles County requirements.</p> <p>The Noise Control Plan shall designate a Construction Relations Officer who is readily available to answer questions or respond to complaints during any hours or days that construction or restoration is occurring. The applicant shall send pre-construction notifications to sensitive receptors located within 100 feet of construction activities at least 30 days prior construction. The notification shall include a phone number for the public to contact the Construction Relations Officer. Additionally, each construction site shall include clearly visible signs with the Construction Relations Officer's public phone number. The applicant shall submit monthly reports to the CPUC summarizing the complaints submitted to the Construction Relations Officer. The summary reports shall describe how each complaint was addressed, if and when it was resolved, and contact information for the</p>	<p>type, hours of use, and location, etc. Monitoring at specific sensitive receptor locations is replaced with modeling at the source of the noise to provide SCE with greater flexibility for implementing the measures.</p> <p>SCE recommends the following edits:</p> <p>“MM NV-1: Noise Control Plan. Prior to the start of construction, the applicant shall prepare a Noise Control Plan to ensure that reduce project construction noise, does not:</p> <ul style="list-style-type: none"> • Increase ambient noise levels by more than 10 dBA (8-hour Leq), or • Exceed the noise level specified in the applicable jurisdiction's noise ordinance. <p>The Noise Control Plan measures shall will be selected based on <u>the specific equipment used and, activity conducted, and proximity to sensitive noise receptors once known.</u> The applicant shall submit the Noise Control Plan to the CPUC at least 30 days prior to the start of construction for review <u>and approval.</u> The Noise Control Plan <u>will shall include, but not be limited to, consider</u> the following noise reduction and control measures:</p> <ul style="list-style-type: none"> • Temporarily <u>and safely</u> install and maintain an absorptive noise control barriers <u>placed between stationary construction equipment and sensitive noise receptors, in the perimeter of construction sites located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers and ensure such barriers are installed in a safely manner.</u> • Limit heavy heavy-equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity. • <u>Efforts will be made to</u> Ensure that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition. • Maintain <u>Efforts will be made to maintain</u> construction equipment according to manufacturer recommendations. • Minimize construction equipment idling <u>to the extent feasible.</u> • Reduce noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimizes the need for back-up alarms and use flagmen to minimize the time needed to back-up vehicles. • When possible, use construction equipment specifically designed for low noise emissions (i.e. e.g., equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines). Electric engines have been reported to have lower noise levels than internal combustion engines. • Where practical, locate stationary equipment such as compressors, generators, and welding machines away from sensitive receptors or behind barriers. <p>The Noise Control Plan shall will detail the frequency, location, and methodology for noise monitoring prior to and during various construction and restoration activities to ensure that reduce generated noise levels do not exceed 10 dBA above existing ambient noise levels, or the applicable jurisdiction noise standards. <u>These methods shall include monitoring noise levels at the boundary of construction areas and using industry-standard computer noise modeling techniques to predict noise levels at adjacent sensitive noise receptors. Should the modeled levels exceed the standards in the applicable jurisdiction's noise standards, noise monitoring near the sensitive receptors shall be conducted to verify the modeling results.</u> The Noise Control Plan shall detail the actions and procedures that the</p>

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

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PUBLIC SERVICES													
4.12.1.2	4.12-5 Lines 25-34	<p>“The proposed project would generate solid waste during construction (e.g., concrete, nonrecyclable metals, green waste, refuse, spoils, trash, and wood poles). SCE would use three <u>four</u> approved, licensed landfills in the vicinity of the proposed project for the solid waste materials: Savage Canyon Landfill in Whittier, Azusa Land Reclamation Landfill in Azusa, and Scholl Canyon Landfill in Los Angeles. These landfills are rated as Class III landfills, which accept clean dirt, concrete, and asphalt (CalRecycle 2015a, b, c). Additionally, Asuza landfill can accept asbestos and Non-hazardous petroleum contaminated soil (CalRecycle 2015a). Savage Canyon <u>El Sobrante</u> Landfill can also accept treated wood waste (CalRecycle 2015b). Disposal of hazardous materials is discussed in Section 4.7, “Hazards and Hazardous Materials.” Characteristics of the three landfills that would serve the proposed project are shown in Table 4.12-3.”</p>	<p>Rationale:</p> <p>SCE disposes of wood poles through Waste Management Inc. and the contract limits locations where the wood poles can be disposed. Savage Canyon is not a facility utilized by SCE for wood poles and any additional locations must be approved through a contract Change Order. Additionally, Savage Canyon only accepts waste from within the Whittier city limits.</p> <p>SCE recommends the following edits:</p> <p>“The proposed project would generate solid waste during construction (e.g., concrete, nonrecyclable metals, green waste, refuse, spoils, trash, and wood poles). SCE would use three <u>four</u> approved, licensed landfills in the vicinity of the proposed project for the solid waste materials: Savage Canyon Landfill in Whittier, Azuza <u>Azusa</u> Land Reclamation Landfill in Azuza <u>Azusa</u>, and Scholl Canyon Landfill in Los Angeles, and <u>El Sobrante Landfill in Corona</u>. These landfills are rated as Class III landfills, which accept clean dirt, concrete, and asphalt (CalRecycle 2015a, b, c). Additionally, Asuza <u>Azusa</u> landfill can accept asbestos and Non-hazardous petroleum contaminated soil (CalRecycle 2015a). Savage Canyon <u>El Sobrante</u> Landfill can also accept treated wood waste (CalRecycle 2015b). Disposal of hazardous materials is discussed in Section 4.7, “Hazards and Hazardous Materials.” Characteristics of the three <u>four</u> landfills that would serve the proposed project are shown in Table 4.12-3.”</p>										
4.12.1.2	4.12-5	Table 4.12-3	<p>Rationale:</p> <p>SCE recommends adding an additional row to the table to include El Sobrante. El Sobrante is the wood pole landfill used for the project area and this information fits the data provided in table 4.12-3. Data from CalRecycle.</p> <p>SCE recommends the following edits:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Landfill</th> <th style="text-align: center;">Distance</th> <th style="text-align: center;">Closure Date</th> <th style="text-align: center;">Waste Permitted</th> <th style="text-align: center;">Remaining Waste Capacity</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;"><u>El Sobrante Landfill</u></td> <td style="text-align: center;"><u>40</u></td> <td style="text-align: center;"><u>2045</u></td> <td style="text-align: center;"><u>184,930,000</u></td> <td style="text-align: center;"><u>145,530,000</u></td> </tr> </tbody> </table>	Landfill	Distance	Closure Date	Waste Permitted	Remaining Waste Capacity	<u>El Sobrante Landfill</u>	<u>40</u>	<u>2045</u>	<u>184,930,000</u>	<u>145,530,000</u>
Landfill	Distance	Closure Date	Waste Permitted	Remaining Waste Capacity									
<u>El Sobrante Landfill</u>	<u>40</u>	<u>2045</u>	<u>184,930,000</u>	<u>145,530,000</u>									
4.12.3.3	4.12-14 Lines 23-28	<p>“However, MM HY-1 (see Section 4.8, “Hydrology and Water Quality”) would require that SCE develop a Storm Water Pollution Prevention Plan (SWPPP), which would include design features to control runoff rates, direct water to the direction of natural drainage, and incorporate SWPPP best management practices to minimize erosion that could cause sedimentation and loss of receiving water capacity during construction.”</p>	<p>Rationale:</p> <p>Compliance with existing laws and regulations is required. Therefore, a mitigation measure is not needed. This is consistent with SCE’s comments in Hydrology and Water Quality.</p> <p>SCE recommends the following edits:</p> <p>“However, MM HY-1 (see Section 4.8, “Hydrology and Water Quality”) would require that SCE <u>will</u> develop a Storm Water Pollution Prevention Plan (SWPPP), which would include design features to control runoff rates, direct water to the direction of natural drainage, and incorporate SWPPP best management practices to minimize erosion that could cause sedimentation and loss of receiving water capacity during construction.”</p>										

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

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

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

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

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

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

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

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

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4.14.3.3	4.14-38 Lines 26-27	“Implementation of MM TT-10 would require SCE to provide traffic control if the exit is closed for Telecommunications Route 3 work. Impacts would be less than significant with mitigation.”	<p>Rationale:</p> <p>Although these impacts may be significant, they are common during a range of SCE construction activities and are mitigated through the jurisdictional permitting process. These conditions are typically covered in encroachment permits. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1.</p> <p>SCE recommends the following edits:</p> <p>“Implementation of MM TT 10 would require SCE to provide traffic control if the exit is closed for Telecommunications Route 3 work. Impacts would be less than significant with mitigation.</p> <p><u>To mitigate these impacts to less than significant, SCE will work with the local jurisdiction through established permitting processes to identify and implement appropriate traffic control measures. In addition, traffic controls measures will be described in traffic control plan required in MM TT-1.”</u></p>
4.14.3.4	4.14-39 Lines 3-24	<p>“MM TT-1: Peak Period Traffic Management Plan. SCE shall prepare and implement a Peak Period Traffic Management Plan, which may be included in a larger Transportation Management Plan for the project, and shall submit the Plan for CPUC review and approval at least 60 days prior to the start of construction.</p> <p>The Plan shall identify specific measures that would reduce significant impacts to significantly affected intersections during the AM or PM peak hours (and during the specified phase) to less than significant levels, i.e., reduce the V/C increase resulting from the proposed project at each identified intersection to at or below the applicable threshold.</p> <p>Primary measures may include:</p> <ul style="list-style-type: none"> • Limiting project-related heavy truck trips during peak hours (e.g., through scheduling deliveries outside of peak hours) so as to reduce trips occurring during peak hours; and • Limiting project construction worker vehicle trips during peak hours (e.g., through requiring carpooling) so as to reduce trips occurring during peak hours. <p>Specific measures would be dependent on the final construction schedule and residing location of construction workers. Measures implemented as part of the plan shall not result in exceedance of applicable thresholds as described in this document at other impacted intersections. The plan shall also demonstrate that mitigation would not result in V/C to exceed thresholds at significantly impacted and non-significantly impacted roads and intersections.”</p>	<p>Rationale:</p> <p>Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1, as shown in SCE’s proposed language for MM TT-1 below. In addition, SCE has added language to MM TT-1 that includes references to MM TT-2, 4, 5, and 7 where SCE will follow existing laws and regulations.</p> <p>SCE recommends the following edits:</p> <p>“MM TT-1: Peak Period Traffic Management Plan. SCE shall prepare and implement a Peak Period Traffic Management Plan, which may be included in a larger Transportation Management Plan for the project, and shall submit the Plan for CPUC review and approval at least 60 days prior to the start of construction. The Plan shall identify specific measures that would reduce significant impacts to significantly affected intersections during the AM or PM peak hours (and during the specified phase) to less than significant levels, i.e., reduce the V/C increase resulting from the proposed project at each identified intersection to at or below the applicable threshold. Primary measures may include:</p> <ul style="list-style-type: none"> • Limiting project related heavy truck trips during peak hours (e.g., through scheduling deliveries outside of peak hours) so as to reduce trips occurring during peak hours; and • Limiting project construction worker vehicle trips during peak hours (e.g., through requiring carpooling) so as to reduce trips occurring during peak hours. <p>Specific measures would be dependent on the final construction schedule and residing location of construction workers. Measures implemented as part of the plan shall not result in exceedance of applicable thresholds as described in this document at other impacted intersections. The plan shall also demonstrate that mitigation would not result in V/C to exceed thresholds at significantly impacted and non-significantly impacted roads and intersections.</p>

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			<p><u>MM TT-1: Traffic Control Plan.</u></p> <p><u>The Plan shall be consistent with the California Joint Utility Traffic Control Manual (CJUTCM) and include, at a minimum, measures to ensure that:</u></p> <p><u>1. Significant impacts to affected intersections during the AM or PM peak hours (and during the specified phase) are reduced to less than significant levels, i.e., reduce the V/C increase resulting from the proposed project at each identified intersection to at or below the applicable threshold.</u></p> <p><u>Primary measures may include:</u></p> <ul style="list-style-type: none"> <u>• Limiting project-related heavy truck trips during peak hours (e.g., through scheduling deliveries outside of peak hours) so as to reduce trips occurring during peak hours; and</u> <u>• Limiting project construction worker vehicle trips during peak hours (e.g., through requiring carpooling) so as to reduce trips occurring during peak hours.</u> <p><u>2. General plans or guidelines be developed to provide safety for motorists, bicyclists, pedestrians, workers, enforcement/emergency officials and equipment in consideration of basic safety principles to route roadway users through construction zones using roadway geometrics and features and traffic control devices comparable to normal roadway situation as possible. The Plan detail shall be appropriate to the complexity of the project work.</u></p> <p><u>3. Roadway user movement should be inhibited as little as practical, based on the recommended considerations of the California Manual on Uniform Traffic Control Devices (CA MUTCD) latest edition, including proper signage, avoiding abrupt changes in geometrics, reducing traffic volume by using alternate routes scheduling work in off-peak hours, and complying with the Americans with Disabilities Act of 1990 (ADA).</u></p> <p><u>4. During truck delivery and exit hours, SCE shall post slow truck warning signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the CA MUTCD.</u></p> <p><u>5. Motorists, bicyclists and pedestrians are guided in a clear and positive manner while approaching and traversing TTC zones and incident sites, applying the principles for proper marking, signing, and flagging.</u></p> <p><u>6. Acceptable levels of operations are provided and routine day and night inspections of Plan elements are implemented.</u></p> <p><u>7. Roadside safety is maintained during the life of the project to accommodate disabled vehicles, run-off-the-road incidents, and emergency situations.</u></p> <p><u>8. Appropriate field workers and management receive training appropriate to the job decisions each individual is required to make.</u></p> <p><u>9. Good public relations are maintained by assessing the needs of the road users, abutting property owners, and</u></p>

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			<p><u>emergency service providers (law enforcement, fire fighters, and medical) and cooperating with various news media, SCE shall notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of road closures at least 1 week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE would also make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers, such as keeping metal plates available to cover open trenches.</u></p> <p><u>Specific measures would be dependent on the final construction schedule and residing location of construction workers. Measures implemented as part of the plan shall not result in exceedance of applicable thresholds as described in this document at other impacted intersections. The plan shall also demonstrate that mitigation would not result in V/C to exceed thresholds at significantly impacted and non-significantly impacted roads and intersections.”</u></p> <p><u>Roadway, highway and lane closure plans shall be prepared and implemented as required and in coordination with the applicable local and Caltrans jurisdictions. Appropriate advance notifications shall be made to the affected jurisdictions and affected property owners.</u></p> <p><u>The Plans shall describe locations and durations of:</u></p> <ul style="list-style-type: none"> • <u>Full road closures</u> • <u>Lane closures</u> • <u>Bicycle lane closures</u> • <u>Sidewalk or pedestrian path closures</u> • <u>Parking lot and Park-N-Ride lot closures</u> <p><u>The highway closure measures shall minimize delays to SR-60 traffic. No work shall occur in Caltrans right-of-way until Caltrans issues the encroachment permit and approves the Traffic Control Plan.</u></p>
4.14.3.4	4.14-39 and 4.41-40 Lines 26-45 and Lines 1-8	<p>“MM TT-2: Road and Lane Closure Plan. SCE shall develop a Road and Lane Closure Plan for the proposed project that outlines how SCE will handle road and lane closures to allow for safe vehicle, bicyclist, and pedestrian passage when road and lane closures occur. The Plan shall be prepared in coordination with local jurisdictions where road and lane closures would occur. Upon determination of the final construction schedule and precise locations and durations of road and lane closures, the Plan shall describe locations and durations of:</p> <ul style="list-style-type: none"> • Full road closures • Lane closures • Bicycle lane closures • Sidewalk or pedestrian path closures <p>Measures to be included in the Plan that would allow for safe vehicle, bicyclist, and pedestrian passage shall adhere to the California Manual on Uniform Traffic Control Devices. Potential measures include:</p>	<p>Rationale:</p> <p>Traffic control is the responsibility of Cal Trans and local governing agencies. SCE will maintain traffic control with guidance from the California Joint Utility Traffic Control Manual and/or Traffic Control Plan approved by the governing agency. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1.</p> <p>SCE recommends the following edits:</p> <p>“MM TT-2: Road and Lane Closure Plan. In coordination with local jurisdictions, SCE shall develop a Road and Lane Closure Plans for the proposed project components that outlines how SCE will handle will require road and lane closures to allow for safe vehicle, bicyclist, and pedestrian passage when road and lane closures occur. The Plan shall be prepared in coordination with local jurisdictions where road and lane closures would occur. Upon determination of the final construction schedule and precise locations and durations of road and lane closures, the</p>

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		<ul style="list-style-type: none"> • Signage directing motorists, pedestrians, and bicyclists to an efficient, safe detour around the closure • Flaggers and/or signage to halt traffic at road closures or direct traffic at lane closures and to allow traffic to pass when construction is halted • Requirements for notifications and a process for communication with affected residents and 1• Emergency service providers would be notified of the timing, location, and duration of construction activities. • Requirement that emergency vehicle access is maintained at all times. <p>The Road and Lane Closure Plan can be included as part of a Transportation Management Plan for the project.”</p>	<p>Plan shall describe locations and durations of:</p> <ul style="list-style-type: none"> • Full road closures • Lane closures • Bicycle lane closures • Sidewalk or pedestrian path closures <p>Measures to be included in the Plan that would allow for safe vehicle, bicyclist, and pedestrian passage shall adhere to the California Manual on Uniform Traffic Control Devices. Potential measures include:</p> <ul style="list-style-type: none"> • Signage directing motorists, pedestrians, and bicyclists to an efficient, safe detour around the closure • Flaggers and/or signage to halt traffic at road closures or direct traffic at lane closures and to allow traffic to pass when construction is halted • Requirements for notifications and a process for communication with affected residents and 1• Emergency service providers would be notified of the timing, location, and duration of construction activities. • Requirement that emergency vehicle access is maintained at all times. <p>The Road and Lane Closure Plan can be included as part of a Transportation Management Plan for the project.”</p>
4.14.3.4	4.14-40 Lines 10-22	<p>“MM TT-3: Highway Closure Plan. SCE shall prepare a Highway Closure Plan to include in its encroachment permit application for crossings of SR-60 that require closure or partial closure of SR-60. The Highway Closure Plan shall:</p> <ul style="list-style-type: none"> • Specify that partial and complete closures of SR-60 are prohibited during peak and daytime (5 a.m. to 10 p.m.) hours. • Require that SCE adhere to Caltrans’ requirements regarding signage to notify motorists of the impending closure. • Map potential detours for SR-60 traffic. <p>The measures in the plan shall minimize delays to SR-60 traffic. No work shall occur in Caltrans right-of-way until Caltrans issues the encroachment permit and approves the Highway Closure Plan.”</p>	<p>Rationale:</p> <p>Traffic control is the responsibility of Cal Trans and local governing agencies. SCE will maintain traffic control with guidance from the California Joint Utility Traffic Control Manual and/or Traffic Control Plan approved by the governing agency. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1.</p> <p>SCE recommends the following edits:</p> <p>“MM TT-3: Highway Closure Plan. SCE shall prepare a Highway Closure Plan to include in its encroachment permit application for crossings of SR-60 that require closure or partial closure of SR-60. The Highway Closure Plan shall:</p> <ul style="list-style-type: none"> • Specify that partial and complete closures of SR-60 are prohibited during peak and daytime (5 a.m. to 10 p.m.) hours. • Require that SCE adhere to Caltrans’ requirements regarding signage to notify motorists of the impending closure. • Map potential detours for SR-60 traffic. <p>The measures in the plan shall minimize delays to SR-60 traffic. No work shall occur in Caltrans right of way until Caltrans issues the encroachment permit and approves the Highway Closure Plan.”</p>
4.14.3.4	4.14-40 Lines	<p>“MM TT-4: Helicopter Lift Plan. SCE’s helicopter contractor shall coordinate with FAA and obtain FAA-required approvals for helicopter operations. SCE’s contractor’s submittal shall include a Helicopter Lift Plan for operations within 1,500 feet (457 meters) of a congested area or within 1,500 feet (457 meters) of residences in compliance with 14 CFR 133.33, which requires that flights</p>	<p>Rationale:</p> <p>If external load operations become needed, SCE will ensure that all pilot, crew members, and helicopters involved in external load operations (e.g. wire stringing) be certified pursuant to 14 CFR 133 (External Load Operations).</p>

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	24-38	<p>be conducted so emergency landings and release of external load can be accomplished without safety risks to people or property when operating over congested areas. Measures may include:</p> <ul style="list-style-type: none"> • Designating who is responsible for equipment inspections • Communication procedures • Establishment of exclusion zones where pedestrians will not be allowed • Training of personnel in safety requirements and procedures <p>The Plan and record of FAA approval shall be provided to the CPUC prior to commencing helicopter operations.”</p>	<p>Please refer to same rationale under impact analysis for MM TT-4.</p> <p>SCE recommends the following edits:</p> <p>“MM TT-4: Helicopter Lift Plan. SCE’s helicopter contractor shall coordinate with FAA and obtain FAA-required approvals for helicopter operations. SCE’s contractor’s submittal shall include a Helicopter Lift Plan for operations within 1,500 feet (457 meters) of a congested area or within 1,500 feet (457 meters) of residences in compliance with 14 CFR 133.33, which requires that flights be conducted so emergency landings and release of external load can be accomplished without safety risks to people or property when operating over congested areas. Measures may include:</p> <ul style="list-style-type: none"> • Designating who is responsible for equipment inspections • Communication procedures • Establishment of exclusion zones where pedestrians will not be allowed • Training of personnel in safety requirements and procedures <p>The Plan and record of FAA approval shall be provided to the CPUC prior to commencing helicopter operations.”</p>
4.14.3.4	4.14-40 and 4.14-41 Lines 40-44 and Lines 1-2	<p>“MM TT-5: FAA No-Hazard Determination. SCE shall obtain a determination of no-hazard from the FAA when notification under 14 CFR 77 is required for:</p> <ul style="list-style-type: none"> • Use of construction equipment, such as cranes; and • Installation of structures, such as lattice steel towers. <p>SCE shall provide documentation of the FAA finding to the CPUC prior to 1 the use of equipment or installation of structures that require notification under 14 CFR 77.”</p>	<p>Rationale:</p> <p>SCE will comply with FAA noticing requirements when notification under 14 CFR 77 is required to reduce impacts to less than significant. Please refer to same rationale under impact analysis for MM TT-5.</p> <p>SCE recommends the following edits:</p> <p>“MM TT-5: FAA No-Hazard Determination. SCE shall obtain a determination of no-hazard from the FAA when notification under 14 CFR 77 is required for:</p> <ul style="list-style-type: none"> • Use of construction equipment, such as cranes; and • Installation of structures, such as lattice steel towers. <p>SCE shall provide documentation of the FAA finding to the CPUC prior to 1 the use of equipment or installation of structures that require notification under 14 CFR 77.”</p>
4.14.3.4	4.14-41 Lines 4-8	<p>“MM TT-6: Slow Truck Warnings. During truck delivery and exit hours, SCE shall post signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the California Manual on Uniform Traffic Control Devices.”</p>	<p>Rationale:</p> <p>SCE will maintain traffic control with guidance from the California Joint Utility Traffic Control Manual and/or Traffic Control Plan approved by the governing agency. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1.</p> <p>SCE recommends the following edits:</p> <p>“MM TT-6: Slow Truck Warnings. During truck delivery and exit hours, SCE shall post signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to</p>

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

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	1-2	<ul style="list-style-type: none"> • Notify LA Metro and other public transit providers of construction along existing public transit routes. The applicant would work with transit providers to temporarily relocate transit stops during construction, if needed. • Provide pedestrians with reasonably safe, convenient, and accessible paths that replicate as nearly as possible the most desirable characteristics of the existing paths (i.e., maintaining sidewalk and bicycle access on at least one side of affected streets during construction). • Layout plans for notifications and a process for communication with affected transit riders, pedestrians, and bicyclists prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which transit routes, bus stops, sidewalks, and bicycle routes would be affected on which days and for how long), and a toll-free telephone number for receiving questions or complaints. • Post detour signs during construction of alternative routes for pedestrians and bicyclists. • Install steel plates over open trenches in inactive construction areas 1 to maintain existing bicycle and pedestrian access after construction hours.” 	<p>“MM TT-9: Public Transit, Pedestrian, and Bicyclist Plan. SCE shall develop and implement a Public Transit, Pedestrian, and Bicyclist Plan with the goal of maintaining safe conditions for pedestrians and bicyclists during construction of the proposed project. Safe conditions include detours for closed sidewalks and closed bicycle lanes as well as relocation of transit stops to areas not affected by construction activities. The control measures included in the Plan shall be based on final plans for closures of sidewalks and bicycle lanes and transit stops. The measures shall be consistent with those published in the California Joint Utility Traffic Control Manual (California Inter-Utility Coordinating Committee 2010).The Plan should include, at a minimum, the measures listed below:</p> <ul style="list-style-type: none"> • Notify LA Metro and other public transit providers of construction along existing public transit routes. The applicant would work with transit providers to temporarily relocate transit stops during construction, if needed. • Provide pedestrians with reasonably safe, convenient, and accessible paths that replicate as nearly as possible the most desirable characteristics of the existing paths (i.e., maintaining sidewalk and bicycle access on at least one side of affected streets during construction). • Layout plans for notifications and a process for communication with affected transit riders, pedestrians, and bicyclists prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which transit routes, bus stops, sidewalks, and bicycle routes would be affected on which days and for how long), and a toll-free telephone number for receiving questions or complaints. • Post detour signs during construction of alternative routes for pedestrians and bicyclists. • Install steel plates over open trenches in inactive construction areas 1 to maintain existing bicycle and pedestrian access after construction hours.”
4.14.3.4	4.14-42 Lines 4-9	<p>“MM TT-10: Whittier Narrows Park-and-Ride Lot. If proposed project work on Telecommunications Route would result in temporary closure of the Whittier Narrows park-and ride lot exit to Durfee Avenue, SCE shall coordinate with Los Angeles County and the Whittier Narrows Recreation Area so that SCE can provide traffic control for two-way traffic at the Santa Anita Avenue entrance to the Whittier Narrows park-and-ride lot during the Durfee Avenue exit closure.”</p>	<p>Rationale:</p> <p>SCE will maintain traffic control with guidance from the California Joint Utility Traffic Control Manual and/or Traffic Control Plan approved by the governing agency. Since many of the Traffic & Transportation mitigation measures can be subsumed under a single Traffic Control Plan, please combine MM TTs 2, 3, 6, 8, 9 and 10 into a single mitigation measure called MM TT-1.</p> <p>SCE recommends the following edits:</p> <p>“MM TT-10: Whittier Narrows Park-and-Ride Lot. If proposed project work on Telecommunications Route would result in temporary closure of the Whittier Narrows park and ride lot exit to Durfee Avenue, SCE shall coordinate with Los Angeles County and the Whittier Narrows Recreation Area so that SCE can provide traffic control for two-way traffic at the Santa Anita Avenue entrance to the Whittier Narrows park and ride lot during the Durfee Avenue exit closure.”</p>
4.14.3.4	4.14-42 Lines 11-22	<p>“MM TT-11: Community Education Center Parking. If proposed project work at the Goodrich Substation would result in parking spot closures at the Community Education Center parking lot, SCE shall coordinate scheduled closures with the Community Education Center and shall obtain a letter from the Community Education Center that states:</p> <ul style="list-style-type: none"> • The dates of parking spot closures; 	<p>Rationale:</p> <p>Please update mitigation measure numbering to conform to SCE’s proposed changes. Please update the name of education center.</p>

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		<ul style="list-style-type: none"> • The number of parking spots that would be closed; and • That the Community Education Center concurs that there will be sufficient parking spots to accommodate SCE's work and the Community Education Center's parking needs. <p>SCE shall submit the letter to the CPUC 30 days prior to Community Education Center parking spot closure."</p>	<p>SCE recommends the following edits:</p> <p>“MM TT-11 2: Pasadena City College <u>Pasadena City College</u> Community Education Center Parking. If proposed project work at the Goodrich Substation would result in parking spot closures at the <u>Pasadena City College</u> Community Education Center parking lot, SCE shall <u>will</u> coordinate scheduled closures with the <u>Pasadena City College</u> Community Education Center <u>on the following and shall obtain a letter from the Community Education Center that states:</u></p> <ul style="list-style-type: none"> • The dates of parking spot closures; • The number of parking spots that would be closed; and • That the <u>Pasadena City College</u> Community Education Center concurs that there will be sufficient parking spots to accommodate SCE's work and the <u>Pasadena City College</u> Community Education Center's parking needs. <p>SCE shall <u>will</u> submit the letter <u>provide documentation of the coordination with the Pasadena City College Community Education Center</u> to the CPUC 30 days prior to <u>Pasadena City College</u> Community Education Center parking spot closure.”</p>
COMPARISON OF ALTERNATIVES			
Note: SCE has provided in-depth comments regarding the alternatives evaluated. Please see SCE's comment letter accompanying this comment table.			
5.3.2.1	5-4 Lines 18-24	<p>“Construction of the One-Transformer-Bank Substation Alternative would result in reduced aesthetic impacts. The 500-kV switchrack would be about half the size of the switchrack for the proposed projects, which would result in fewer structures at the substation visible from viewpoints on Potrero Grande Drive. However, the transformer bank and 500-kV switchrack would be located adjacent to Potrero Grande Drive, closer to viewers, meaning that the new substation structures would still be visually dominant. The reduction in visual impacts (Impact AE-1) would be slight compared to the proposed project's visual impacts.”</p>	<p>Rationale:</p> <p>As noted above, the DEIR incorrectly identifies significant aesthetic impacts of the proposed project. The Less than significant impacts of this alternative would be the same as the proposed project.</p> <p>The DEIR conclusions regarding Visual Impacts of Alternatives are not supported by technical analysis. For example, visual simulations were not prepared to support the aesthetics alternatives evaluation. The DEIR states that the 500-kV switchrack would be about half the size of the switchrack for the proposed project which would result in fewer structures at the substation visible from viewpoints on Potrero Grande Drive, and that the transformer bank and 500-kV switchrack would be located adjacent to Potrero Grande Drive, closer to viewers, which mean the new substation structures would be visually dominant. However, in terms of views from the roadway, the DEIR provides no evidence to support a conclusion that potential aesthetic effects associated with the alternative would be preferable to the impacts associated with the proposed project. In fact, the less than significant impacts of this alternative would be the same as the proposed project. As noted above, the DEIR incorrectly identifies significant aesthetic impacts of the proposed project. We also note that no simulations were prepared to support the conclusions of the Aesthetics alternatives analysis.</p> <p>SCE recommends the following edits:</p>

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

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

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

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cont.

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Mesa 500 kV Substation Project

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Section	Page	DEIR Language	SCE Recommended Language	
	35		SCE recommends the following edits: “...features within the proposed project area, approximately 3-7 <u>0.37</u> acres <u>waters of the US (USACE / RWQCB)</u> and 2.66 acres <u>jurisdictional streambed and associated riparian habitat (CDFW)</u> may be permanently impacted,”	D2-229 cont.
6.0	6-20 Line 20	“..transformers...”	Rationale: Please correct typographical error. SF6 is not used in transformers, but it is used in circuit breakers. SCE recommends the following edits: “... <u>circuit breakers</u> transformers ...”	D2-230
MMRP				
Table 8-1	8-3 to 8-24	Table 8-1 Mitigation Measures	SCE recommends the following edits per Attachment 8.0 MMRP.	D2-231
8.2	8-25	The following procedure will be observed for dispute resolution: Step 1. Disputes and complaints (including those of the public) should be directed first to the CPUC-designated Project Manager for resolution. The CPUC Project Manager will attempt to resolve the dispute.	Rationale: The way this procedure is written can be confusing and can be interpreted that all complaints (including the public) should first go to the CPUC project manager. SCE recommends the following language that was provided and accepted in the West of Devers Final EIR. SCE recommends the following edits: Step 1. Disputes and complaints (including those of the public) should be directed first to the CPUC-designated Project Manager for resolution. The CPUC Project Manager will attempt to resolve the dispute. <u>If the dispute can be resolved by SCE then the CPUC’s Project Manager would direct the person to SCE. If the complaint is received by SCE’s Construction Relations Officer, the complaint would be handled by SCE in accordance with Mitigation Measure MM NS-1 (Noise Control Plan).</u>	D2-232

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

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

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM AES-6: Night Lighting. To minimize the effect on any nearby sensitive receptors, night lighting for construction activities, staging areas and other areas used for construction, and nighttime facility operations shall be the minimum necessary to ensure safety and security for nighttime activities and operations. All night lighting used for construction or operations and maintenance shall orient lights downward and be shielded to eliminate off-site light spill at times when the lighting is in use. Lighting at the proposed Mesa Substation shall consist of light-emitting diode lights in all areas where nighttime operations or maintenance activities would occur and be either motion-activated or use timers to the maximum extent feasible to ensure safety and security and reduce the impact of additional light pollution at night.</p>	<p>CPUC verifies that SCE uses the minimum lighting necessary to safety and security for nighttime activities and operations, orients downwards and shields all lighting, and ensures that lighting proposed at the Mesa Substation shall consist of light-emitting diode lights in all areas where operations or maintenance activities would occur.</p>	<p>During Construction</p>	<p>All locations with nighttime lighting.</p>
Air Quality			
<p>APM-AIR-01: Fugitive Dust. During construction, surfaces disturbed by construction activities would be covered or treated with a dust suppressant until completion of activities at each site of disturbance. On-site unpaved roads and off-site unpaved access roads utilized during construction within the proposed project area would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant). On-road vehicle speeds on unpaved roadways would be restricted to 15 miles per hour.</p>	<p>CPUC verifies that SCE applies dust suppressant to surfaces disturbed by construction activities, and all unpaved roads would be stabilized using a water/chemical suppressant.</p>	<p>During Construction</p>	<p>Entire project area.</p>
<p>APM-AIR-02: Tier 3 Engines. Off-road diesel construction equipment with a rating between 100 and 750 horsepower (hp) would be required to use engines compliant with EPA Tier 3 non-road engine standards. In the event that a Tier 3 engine is not available, the equipment would be equipped with a Tier 2 engine, and documentation would be provided from a local rental company stating that the rental company does not currently have the required diesel-fueled off-road construction equipment or that the vehicle is specialized and is not available to rent. Similarly, if a Tier 2 engine is not available, that equipment would be equipped with a Tier 1 engine and documentation of unavailability would be provided.</p>	<p>CPUC verifies that all off-road diesel equipment between 100 and 750 horsepower use engines compliant with Tier 3 non-road engine standards. CPUC will verify if a Tier 3 engine is not available per proper documentation, and a Tier 2 or Tier 1 engine must be used.</p>	<p>Prior to <u>and During</u> Construction</p>	<p>Any area where off-road diesel construction equipment is being utilized.</p>
<p>MM AQ-1: Construction Emission Reduction Measures. SCE shall implement the following emission reduction measures for all construction activities:</p> <ol style="list-style-type: none"> All off-road diesel-powered construction equipment with engines greater than 100 horsepower (hp) shall be compliant with Tier 4 off-road emissions standards where available. In the event that equipment with a Tier 4 engine is not available for any off road engine larger than 100 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 4 emission levels. All off-road diesel-powered construction equipment with engines greater than 50 hp shall be compliant with Tier 3 off-road emissions standards where available. In the event that equipment with a Tier 3 engine is not available for any off road engine larger than 50 hp, that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NOX to no more than Tier 3 emission levels. Equipment with an engine not compliant with the Tier 3 or Tier 4 standards, as applicable, will be allowed on a case-by-case basis only when the applicant has documented that no Tier 3 or Tier 4 equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with signed written correspondence by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms representing a good faith effort to locate engines that meet Tier 3 or Tier 4 requirements, as applicable. Documentation will be submitted to CPUC staff for review before equipment is used on the project. Submit to CPUC staff and/or construction monitors a copy of each piece of construction equipment’s certified tier specification, best available control technology (BACT) documentation, and/or CARB or SCAQMD operating permit, as applicable, at least 15 days prior to mobilization of each applicable unit of equipment.” 	<p>SCE shall submit to CPUC staff and/or construction monitors a copy of each piece of construction equipment’s certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit, as applicable, at least 15 days prior to mobilization of each applicable unit of equipment.</p>	<p>Prior to <u>and During</u> Construction</p>	<p>Entire project area.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>“MM AQ-2: Volatile Organic Compounds Credits. The remaining emissions of VOC/ROG resulting from construction of the proposed Mesa Substation Project shall be mitigated through the purchase of Emissions Trading Credits (ETCs) for every pound of VOC/ROG in excess of the SCAQMD regional significance threshold of 100-75 pounds per day, as measured. The total amount of VOC/ROG ETCs to be purchased shall be calculated once the construction schedule is finalized. The applicant shall purchase and submit documentation of the purchase of up to twice the estimated amount of credit of the required ETC to the SCAQMD prior to the start of construction. The applicant shall also track actual daily ROG emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for ROG emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional ROG credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.</p>	<p>CPUC verifies that SCE has purchased and submitted documentation of the required ETC to the SCAQMD, and that SCE submits the results of a monitoring plan tracking to CPUC staff. If monthly reports indicate that too few credits have been purchased to compensate for ROG emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional ROG credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.</p>	<p>Prior to Construction – Calculate the total amount of VOC/ROG ETCs to be purchased.</p> <p>During Construction – Adhere to monitoring plan and submit reports to CPUC on a monthly basis.</p> <p>Post-construction – Submit proof of the purchase of credits within 7 months of the end of construction.</p>	<p>Entire project area.</p>
<p>“MM AQ-3: Measures to Reduce NOX Emissions. Prior to construction, the applicant and SCE will submit proposed additional measures to reduce daily emissions of NOX to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction. Measures may include the following:</p> <ol style="list-style-type: none"> 1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NOX emissions requirements if 2010 model year or newer diesel trucks cannot be obtained. 2. A requirement that, during project construction, all construction equipment shall be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. 2.3. Other measures as determined appropriate by the applicant and SCE in consultation with the SCAQMD.” 	<p>Prior to construction, the applicant and SCE will submit proposed additional measures to reduce daily emissions of NOX to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction.</p>	<p>Prior to Construction – Verify measures have been identified for implementation.</p> <p>During Construction – Implement proposed additional measures.</p>	<p>Entire project area.</p>
<p>“MM AQ-4: Mitigation Agreement for Purchase of Oxides of Nitrogen (NOX) Credits. Twenty days prior to the start of project construction, the applicant shall provide CPUC staff with an estimate of the total construction -related NOX emissions after implementation of all applicable mitigation measures, broken down by individual construction day. All NOX emissions that would exceed the daily threshold of 100 pounds per day shall be offset through the purchase of either Regional Clean Air Incentive Market Trading Credits (RTCs), Mobile Source Emission Reduction Credits (MSERCs), or a combination of RTCs and MSERCs. For each day that estimated NOX emissions are less than 100 pounds per day, the purchase of NOX offset credits is not required.</p> <p>The total amount of NOX RTCs and/or MSERCs to be purchased shall be determined by the CPU after the construction schedule and operating conditions are finalized, based on estimates provided by the applicant as described above. The NOX emission credits shall be purchased and submitted to the CPUC prior to the start of project construction. The ERCs purchased will be up to twice the amount estimated to be needed. Credits must be current for the time the project takes place. The applicant shall also track actual daily NOX emissions during construction according to a monitoring plan that includes records of equipment and vehicle usage and submit the results of this tracking to CPUC staff on a monthly basis. If monthly reports indicate that too few credits have been purchased to compensate for NOX emissions after implementation of all applicable mitigation measures, the applicant shall purchase additional NOX credits within 6 months of the end of construction. The applicant shall submit proof of the purchase of credits within 7 months of the end of construction.</p>	<p>Twenty days prior to the start of project construction, the applicant shall provide CPUC staff with an estimate of the total construction-related NOX emissions. The NOX emission credits shall be purchased and submitted to CPUC prior to the start of project construction.</p> <p>SCE shall submit results of monitoring plan tracking to CPUC on a monthly basis.</p> <p>The applicant shall submit proof of the additional credits purchased during construction, within 7 months of the end of</p>	<p>Prior to Construction – Provide CPUC staff with estimate of total construction-related NOX emissions and purchase the credits.</p> <p>During Construction – Implement monitoring plan tracking equipment and vehicle use. If needed, purchase additional credits within 6 months of the end of construction.</p> <p>Post-construction – Submit proof of additional credits purchased during construction within 7 months from the end of construction.</p>	<p>Entire project area.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

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

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

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

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM BR-3: Habitat Restoration and Mitigation. Prior to construction of the proposed project the applicant shall ensure that seasonally- appropriate surveys of vegetation are completed by a qualified botanist familiar with these vegetation associations. SCE shall develop a Habitat Restoration and Mitigation Plan that shall include an estimate of the total area of sensitive natural communities, including all coastal California gnatcatcher habitat and riparian habitat. With the consultation and review of the USFWS, CDFW, and CPUC, SCE shall prepare the plan to ensure restoration of all temporary impact areas and to ensure mitigation for permanent impacts on sensitive natural communities and coastal California gnatcatcher habitat. The plan must be submitted 60 days prior to the planned start of construction. CPUC approval is required before the plan is implemented. Required plan details include but are not limited to:</p> <ul style="list-style-type: none"> All temporarily impacted areas shall be restored. All temporary disturbances to sensitive natural communities shall be restored with the pre-disturbance natural community. All other temporarily impacted areas shall be restored with coastal sage scrub if feasible and appropriate. Areas that do not provide habitat to coastal California gnatcatcher, other special-status species, or sensitive resources may be restored to the conditions agreed upon between the landowner and the applicant. The restoration plan shall specify how each type of vegetation community, including sensitive natural communities, shall be addressed in terms of the following restoration details: topsoil segregation and conservation; vegetation treatment and removal; revegetation methods, including seed mixes, rates, and transplants; criteria to monitor and evaluate revegetation success (minimum of 4 years of monitoring and <u>achieving establishment of 70-80% relative cover</u> for sensitive natural communities); and compensation and remedial measures to be implemented as needed.. For sensitive natural communities, mitigation of permanent impacts shall occur after construction at a level of 1:1. In addition, permanent disturbances to coastal California gnatcatcher habitat that is not coastal sage scrub or another sensitive natural community shall be mitigated at a 1:1.0<u>1.5</u> ratio. Mitigation for permanent impacts shall be completed through one of the following methods: <ol style="list-style-type: none"> Establishing the natural community <u>with similar quality and conditions that currently exist</u> within the proposed project areas (onsite); Establishing the natural community <u>with similar quality and conditions that currently exist</u> outside the proposed project areas (within one mile of the project area); If Options 1 and 2 are not feasible, SCE shall purchase credits and/or mitigation lands at a ratio of 2:1 from an entity approved by CDFW and USFWS, as appropriate. <p>For Options 1 and 2 (onsite and offsite), the plan shall specify restoration details, including that post-construction monitoring shall be performed for a minimum of four years, a success criteria of restoring native vegetation to the same pre-existing conditions, <u>achieving establishment of 70-80% relative cover, shall be met, and r</u> Remedial measures shall be implemented if success criteria are not met.”.</p> Impacts on areas that were previously restored for SCE’s TRTP shall be avoided if possible. The plan shall identify any impacts on areas that were previously restored for TRTP and provide detailed restoration plans for these areas. Restoration in these areas shall follow restoration criteria that are consistent with the goals and criteria of TRTP restoration, per TRTP Mitigation Measure B-1a: Provide restoration/compensation for impacts to native vegetation communities. <p>With CPUC approval, requirements described in this mitigation measure and the Habitat Restoration and Mitigation Plan may be satisfied through compliance with permit conditions, if these requirements are equally or more effective.</p> <p>SCE shall also minimize the removal of coastal sage scrub or other suitable coastal California gnatcatcher habitat, particularly within designated critical habitat for the coastal California gnatcatcher. To minimize the removal of vegetation in habitat areas of the coastal California gnatcatcher, SCE shall ensure that trimming of all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher is monitored by a qualified biologist approved by the CPUC. Trimming of native trees and native arborescent shrubs shall be completed outside of the nesting bird season and shall be monitored by a qualified biologist.</p>	<p>The plan must be submitted 60 days prior to the planned start of construction. CPUC approval is required before the plan is implemented.</p> <p>CPUC shall verify that USFWS, <u>U.S. Army Corps of Engineers</u>, and CDFW have reviewed the plan.</p> <p>With CPUC approval, requirements described in this mitigation measure and the Habitat Restoration and Mitigation Plan may be satisfied through compliance with permit conditions, <u>as approved by the regulating agency, if these requirements are equally or more effective.</u></p>	<p>Prior to Construction – Ensure seasonally appropriate surveys of vegetation are completed and a Habitat Restoration and Mitigation Plan is prepared.</p> <p>During Construction - Minimize the removal of coastal sage scrub or other suitable coastal California gnatcatcher habitat.</p> <p>Post-construction – Restore all temporarily impacted areas and mitigate for permanent impacts on sensitive natural communities and coastal California gnatcatcher habitat.</p>	<p>Entire project area.</p>
<p>MM BR-4: Noxious and Invasive Weed Control Plan. Prior to construction, the applicant shall submit a Noxious and Invasive Weed Control Plan that shall be implemented before, during, and after construction, including during the project restoration phase. This plan shall include measures designed to avoid the introduction and spread of noxious weeds and invasive plant species designated by the state, the counties, and local weed control boards. This plan shall be developed <u>as required by agency permits and</u> in consultation with CDFW and CPUC and shall be provided to these agencies for review and comment. The plan must be submitted to the CPUC 60 days prior to the planned start of construction. CPUC approval is required before the plan is implemented.</p> <p>At a minimum, this plan shall include the following measures:</p>	<p>This plan shall be developed in consultation with CDFW and CPUC and shall be provided to these agencies for review and comment. The plan must be submitted to the CPUC 60 days prior to the planned start of construction. CPUC approval is</p>	<p>Prior to Construction – Prepare and submit a Noxious and Invasive Weed Control Plan and perform pre-construction surveys for special-status plant species.</p> <p>During Construction – Implement</p>	<p>Entire project area.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<ul style="list-style-type: none"> Pre-construction surveys for special-status plant species (APM BIO-01 and MM BR-1) shall include surveys for state-, county-, and locally-designated noxious weed species. The applicant shall coordinate with the appropriate agencies, including the CPUC, to determine appropriate species-specific measures to implement, or whether control or treatment of a species is feasible and preferable. All vehicles and equipment shall be clean and free of dirt, mud, and any debris that may carry invasive plant seeds or parts prior to arrival at the project location, including prior to use of access roads. Vehicle and equipment wash stations (mobile or built in place) shall be erected at strategic locations on the ROW where designated weed species have been detected, and where doing so would help prevent the spread of these species. Straw, hay, gravel, soil, or other construction or erosion control materials that could inadvertently contain unwanted plant propagules shall come from state-cleared sources that are free of invasive weeds. All seeds to be used in revegetation and reclamation activities shall come from weed-free sources. All temporary disturbance areas that will be restored to pre-construction condition during post-construction shall be monitored for invasive species establishment of <u>new invasive species</u> on a monthly basis during the growing season and on a quarterly basis outside of the growing season basis for at least one year after project restoration is completed. If evidence of the expansion or increase in abundance of a known invasive species or introduction of a new invasive species is found, the applicant shall initiate appropriate control measures, which may include mowing or trimming of weeds prior to seed set, as outlined in the plan. 	<p>required before the plan is implemented.</p>	<p>the Noxious and Invasive Weed Control Plan.</p> <p>Post-construction – Monitor of all restored work areas for the presence of invasive weeds.</p>	
<p>MM BR-5: Worker Environmental Awareness Program. The applicant shall develop and implement a WEAP for all project personnel. The program must be submitted to the CPUC at least 30 days prior to the start of construction for review. CPUC approval is required before the program is implemented. All project personnel shall undergo training prior to entering the ROW. The training shall include a description of the species of concern and their habitats, the general provisions of applicable environmental regulations, the need to adhere to the provisions of the regulations, the penalties associated with violating the provisions of the regulations, the general measures that are being implemented to conserve the species of concern as they relate to the project, the access routes to the project, and project boundaries within which the project-related activities must be accomplished. This training shall include a detailed review of how project personnel can identify sensitive biological resources in the project area which need to be avoided or where work activities will be restricted.</p>	<p>SCE shall submit sign-in sheets for those who attended WEAP training.</p>	<p>Prior to Construction – <u>Submit WEAP</u> During Construction – <u>Submit sign-in sheets monthly</u></p>	<p>Entire project area.</p>
<p>MM BR-6: Avoidance of Nevin’s barberry. The project shall be designed to avoid impacts on occurrences of Nevin’s barberry during construction and operation and maintenance. Prior to the start of construction, the applicant’s CPUC-approved qualified biologist <u>botanist</u> shall flag complete pre-construction surveys in suitable habitat during the appropriate blooming period to identify any <u>previously identified by protocol plant surveys</u>. Unless otherwise specified by the USFWS, where Nevin’s barberry occurs, all <u>ground disturbing or pole maintenance work during construction and operation and maintenance activities shall occur outside a restrictive buffer of 25 feet; however, trucks may drive past the individuals wherever existing access roads have already been established farther than 15 feet away from a given plant.</u> Vehicles and crew members shall be prohibited from coming within 200 feet of identified Nevin’s barberry unless a buffer reduction is approved by the CPUC as determined after consultation with USFWS. A reduced buffer shall be a minimum of 25 feet or greater from a Nevin’s barberry plant. A qualified botanist biologist approved by the CPUC shall monitor crew members and the Nevin’s barberry to ensure all project activities comply with the USFWS requirements established through consultation stay away from Nevin’s barberry within the buffer. The biologist botanist shall have the authority to halt work if it is determined that Nevin’s barberry could be impacted.</p> <p>In the event that previously unknown occurrences of Nevin’s barberry are discovered during pre-construction surveys or during construction or operations, a 200-foot buffer shall be established and the USFWS and CPUC shall be contacted within 24 hours.</p>	<p>SCE shall submit preconstruction survey results to the CPUC, report any previously unknown occurrences found during pre-construction surveys or construction, and submit a monitoring report.</p>	<p>Prior to Construction – Conduct pre-construction surveys in suitable habitat to identify any occurrences and establish a buffer around any occurrences.</p> <p>During Construction – Monitor construction around buffers.</p>	<p>Areas of suitable habitat for Nevin’s barberry and around known occurrences.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM BR-7: Restoration of Southern California Black Walnut. SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of final engineering design of project features), black walnut tree evaluation surveys shall be completed by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist must be approved by the CPUC. The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots.</p> <p>California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 3:1 ratio. If the diameter at breast height of the tree to be removed is 24 inches or less, it shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established.</p> <p>Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC, and in consultation with USFWS and CDFW. Replacement trees shall be planted before tree removal, or if not feasible or if potentially harmful to the replacement trees, as soon as possible after removal.</p> <p>If CPUC dismisses SCE’s recommendation to merge MM BR-7 in to MM BR-8, please consider the following recommendations:</p> <p>MM BR-7: Restoration of Southern California Black Walnut. SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees <u>or purchase credits at a mitigation bank</u> for any impacted or removed specimens. Prior to construction (after completion of final engineering design of project features), black walnut tree evaluation surveys shall be completed by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist must be approved by the CPUC. The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots.</p> <p>California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 3:1<u>3:12:1</u> ratio. If the diameter at breast height of the tree to be removed is 24 inches or less, it shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established.</p> <p>Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, is approved by the CPUC and in consultation with USFWS and CDFW. Replacement trees shall be planted before tree removal, or if not feasible or if potentially harmful to the replacement trees, as soon as possible after removal.</p>	<p>CPUC shall approve a detailed plan for restoration, including identification of planting location, in consultation with USFWS and CDFW.</p>	<p>Prior to Construction – Complete black walnut tree evaluation surveys.</p> <p>During Construction – Monitor construction activities that take place within the driplines of black walnut trees.</p> <p>Post-construction – Replace those black walnut trees impacted or removed by construction activities.</p>	<p>All project locations where black walnut trees occur.</p>

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cont.

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM BR-8: Restoration of Special-status Plants. The applicant shall complete pre-construction surveys during the appropriate blooming period to identify special-status plants, including Plummer’s mariposa lily, intermediate mariposa lily, and Southern California tarplant populations in the proposed project component areas where suitable habitat is present. Special-status plants shall be identified by a qualified biologist and they will be flagged or surrounded with fencing in such a way that disturbance of the populations or individuals shall be avoided. <u>If pre-construction surveys find special-status plants, a qualified biologist shall be identified and they will be flagged or surrounded with fencing in such a way that disturbance of the populations or individuals shall be avoided.</u> In the event that populations or individuals cannot be avoided, the applicant shall develop and implement a restoration plan for each plant, which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. CPUC approval is required before the plan is implemented. <u>Additionally, SCE will coordinate with MWD with respect to planting locations to ensure there is no effect on MWD O&M activities with regards to the relocated Middle Feeder.</u></p> <p><u>In addition, SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of final engineering design of project features), black walnut trees identified in the impact area will be evaluated by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots. California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 2:1 ratio. Tree removal shall not be permitted until a detailed plan for restoration, is approved by the CPUC.</u></p> <p>For temporary impacts to special-status plants, restoration shall occur after construction and to an extent such that “no net loss” is ensured for all special-status plants <u>in</u> the proposed project component areas. The number of plants at seven years will be equal to or greater than the number destroyed.</p> <p>Mitigation for <u>permanent</u> impacts shall be completed by:</p> <ol style="list-style-type: none"> 1. Establishing <u>individual</u> plants within the proposed project areas (onsite); 2. Establishing <u>individual</u> plants outside the project areas (offsite); or 3. Purchase of credits and/or mitigation lands at a ratio of 2:1 from an entity approved by CDFW. <p>For Options 1 and 2 (establishing plants onsite or offsite), the plan shall include the following elements: planting/seeding palettes; monitoring and contingency program monitoring schedule, including duration (seven years) and performance criteria (no net loss); and any specific measures that will be required to ensure success of the restoration effort. <u>Also for Options 1 and 2, removed walnut trees that have 24 inches or less diameter at breast height shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established. For option 1, the replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area.</u></p>	<p>CPUC shall verify that pre-construction surveys occur during the appropriate blooming period and that any special – status plants are flagged or fenced for avoidance.</p> <p>In the event that populations or individuals cannot be avoided, the applicant shall develop and implement a restoration plan for each plant, which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. CPUC approval is required before the plan is implemented.</p>	<p>Prior to Construction – Conduct pre-construction surveys. Develop restoration for each special-status plant that cannot be avoided.</p>	<p>All project areas where suitable habitat is present for Plummer’s mariposa lily, intermediate mariposa lily, and Southern California tarplant.</p>
<p>MM BR-9: Construction Monitoring. The applicant shall ensure that a qualified biologist approved by the CPUC serves as a construction monitor during periods when construction activities occur near active nest areas, or within 100 feet of native vegetation or vegetation that has the potential, or is known, to provide habitat for special-status species. The monitor shall have the authority to temporarily stop work that they determine threatens a special-status species or sensitive resource. The monitor shall determine what appropriate action to take, and work will resume once the monitor determines there is no longer a threat to the special-status species or sensitive resource, or consultation has occurred with the appropriate wildlife agencies which determines appropriate steps have been taken and a threat is no longer present.</p>	<p>CPUC shall verify that a CPUC-approved biologist is present during construction activities occurring near active nest areas, or within 100 feet of native vegetation or vegetation that has the potential, or is known, to provide habitat for special-status species.</p>	<p>During Construction</p>	<p>All project areas near active nest areas, or within 100 feet of native vegetation or vegetation that has the potential, or is known, to provide habitat for special-status species.</p>

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APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM BR-10: Open Trenches. To prevent entrapment of wildlife, SCE shall ensure that all steep-walled trenches, auger holes, or other excavations are covered at the end of each day or completely fenced off at night in such a way that wildlife cannot become entrapped. For open trenches only, these may instead have wildlife escape ramps within the trench maintained at intervals of no greater than 100 feet. These ramps shall have a maximum slope not to exceed 2:1. SCE’s biological monitor, approved by the CPUC, shall inspect all trenches, auger holes, or other excavations a minimum of three times per day and immediately prior to backfilling. All non-special-status wildlife species found will be safely removed and relocated out of harm’s way, through the use of suitable tools such as a pool net when applicable. For safety reasons, under no circumstance will biological monitors enter open excavations.</p>	<p>CPUC shall verify that all steep-walled trenches, auger holes, or other excavations are covered at the end of each day or completely fenced off at night in such a way that wildlife cannot become entrapped. Escape ramps are acceptable for open trenches only.</p>	<p>During Construction</p>	<p>All project areas containing steep-walled trenches, auger holes, or other excavations.</p>
<p>MM BR-11: Nesting Bird Management Plan. To address potential conflicts between construction activities and the activities of nesting birds in the project component areas, SCE shall develop a nesting bird management plan in consultation with USFWS, CDFW, and CPUC, and shall submit the final plan to the CPUC no less than 60 days prior to construction. CPUC approval is required before the plan is implemented. The nesting bird management plan shall include measures and an adaptive management program to avoid and minimize impacts to special-status <u>species not listed pursuant to the ESA or CESA</u> and MBTA-California Fish and Game Code-protected bird species during nesting periods during project construction. Specifically, the nesting bird management plans shall contain:</p> <ul style="list-style-type: none"> • Appropriate survey timing, extents, methods, and surveyor qualifications; approved nest deterrent methods, including areas where vegetation will be cleared for the purpose of deterring nesting; monitoring and reporting protocols during construction; protocol for determining whether a nest is active; protocol for documenting, reporting, and protecting active nests within construction areas. If pre-construction survey protocols exist for a certain species, the plan shall <u>reference</u> outline the implementation of these protocols • Guidelines for determining appropriate and effective buffer distances that will account for specific project settings, bird species, stage of nesting cycle, and construction work type. Language for buffer reduction process will be included in the plan, which shall include coordination with the appropriate wildlife agencies and the CPUC if reducing the buffer of a factor or special-status species. • Language specifying that the determination of appropriate and effective buffers between construction activities and identified nests shall be site- and species/guild-specific and data-driven, and will not be based on generalized assumptions regarding all nesting birds. • Language specifying that determinations of appropriate and effective buffers between construction activities and identified nests can be made in the project construction area by the CPUC-approved biological monitor (qualified in accordance with nesting bird plan standards, which will include specific requirements for education and experience in conducting biological surveys and with specific birds in the project area). • Vertical buffers shall be put in place in those areas where helicopters will be used, and they will be based on anticipated effects of rotor wash and noise for the class of helicopter being used by SCE. Surveys and monitoring of the active buffer areas will be performed by a CPUC-approved biologist before, during, and after helicopter use in the vicinity of active buffers. • Burrowing owl pre-construction surveys shall adhere to the current burrowing owl survey protocol identified by CDFW (i.e., CDFW’s Staff Report on Burrowing Owl Mitigation [CDFG 2012]). If pre-construction burrowing owl surveys confirm the presence of burrowing owl, SCE shall submit a Burrowing Owl Compensation Plan, in consultation with CDFW and the CPUC, which is consistent with mitigation guidelines in the Staff Report, prior to construction. The final Burrowing Owl Compensation Plan shall be implemented, as specified, throughout construction and restoration. The plan shall describe the compensatory measures that will be undertaken to address the loss of burrowing owl burrows within the project area. This will include mitigation for permanent impacts on nesting, occupied, and satellite burrows and occupied burrowing owl habitat with (a) permanent conservation of similar vegetation communities comparable to or better than that of the impact area, and (b) sufficiently large acreage, and presence of fossorial mammals. <p>SCE shall notify CDFW, USFWS, and the CPUC of all project-related bird injuries or mortalities within 12 hours of discovery and will follow the agencies’ recommended actions, if any. Reporting of nesting bird activities, buffer reductions, and monitoring results shall be provided to the USFWS, CDFW, and the CPUC on a regular basis.</p>	<p>SCE shall develop a Nesting Bird Management Plan in consultation with USFWS, CDFW, and CPUC, and shall submit the final plan to the CPUC no less than 60 days prior to construction. CPUC approval is required before the plan is implemented.</p> <p>Reporting of nesting bird activities, buffer reductions, and monitoring results shall be provided to the USFWS, CDFW, and the CPUC on a regular basis.</p>	<p>Prior to Construction – Conduct surveys during the appropriate nesting season.</p> <p>During Construction – Perform monitoring and prepare reports.</p>	<p>All work areas in which any construction related activities are conducted.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM BR-12: Gnatcatcher Surveys. Prior to the start of construction, SCE shall ensure that protocol-level pre-construction surveys are conducted by a qualified biologist approved by the CPUC for the coastal California gnatcatcher in project component areas where suitable habitat exists in accordance with the Coastal California Gnatcatcher (<i>Polioptila californica californica</i>) Presence/Absence Survey Guidelines (USFWS 1997). In the event that coastal California gnatcatchers are observed during pre-construction surveys, a qualified biologist must identify the boundaries of the pair's territory and SCE must not conduct construction activities within 500 feet of the territory, or as otherwise approved by the CPUC, with documentation of their consultation with USFWS provided to the CPUC and CDFW. SCE shall notify USFWS and CDFW in the event gnatcatcher territory or nest sites are confirmed by surveys, immediately upon return from the field. If infeasible to maintain a buffer of 500 feet (or a distance otherwise approved by USFWS and CDFW), by installing temporary flagging or fencing, from an active gnatcatcher territory, construction activities within or near these areas will be performed outside the breeding and nesting season (coastal California gnatcatcher breeding/nesting season is approximately February 1 through August 30). SCE may conduct construction activities in gnatcatcher habitat during the breeding and nesting season if protocol-level surveys (conducted within one year prior to construction activities per protocol) confirm the absence of breeding gnatcatchers, or if the 500-foot protective buffer from all active gnatcatcher territories can be maintained.</p>	<p>CPUC shall ensure that protocol-level surveys are conducted.</p>	<p>Prior to Construction – Conduct protocol-level surveys. During Construction – Perform monitoring and prepare monitoring reports.</p>	<p>All work areas where suitable coastal California gnatcatcher habitat exists.</p>
<p>MM BR-13: Pre-Construction Surveys for Least Bell's Vireo. Prior to construction and within their breeding season (generally April 1-August 31), SCE shall complete protocol-level surveys for least Bell's vireo in native riparian areas habitat of suitable or potentially suitable habitat within the proposed component areas, unless otherwise agreed upon by USFWS and CDFW. Surveys will be conducted by a qualified biologist approved by the CPUC according to the survey protocol for least Bell's vireo (USFWS 2001). In the event that least Bell's vireo territory or nest sites are confirmed, SCE shall notify the USFWS and CDFW immediately within 48 hours upon return from the field. If individuals or their nests are observed, biologists will establish and maintain a minimum 500-foot (or a distance otherwise approved buffer from USFWS and CDFW) exclusionary buffer by installing temporary flagging or fencing between the nest territory and construction activities. If infeasible to maintain a buffer of 500 feet (or a distance otherwise approved by USFWS and CDFW), from an active vireo territory, construction activities within or near these areas will be performed outside the breeding and nesting season.</p>	<p>CPUC shall ensure that protocol-level surveys are conducted.</p>	<p>Prior to Construction – Conduct protocol-level surveys during LBVI activity periods. During Construction – Perform monitoring and prepare monitoring reports if work conducted near LBVI habitat during the breeding season.</p>	<p>All work areas where suitable least Bell's vireo habitat exists.</p>
<p>MM BR-14: Minimize Impact on Riparian Habitat and Aquatic Features. SCE shall complete the following:</p> <ol style="list-style-type: none"> In those areas where riparian vegetation is required to be removed, SCE shall work with a qualified botanist to determine the minimum amount of vegetation required to be removed in order to accommodate project construction, and the correct trimming procedures to employ. Temporary impacts to riparian habitat or aquatic features shall be fully restored according to the Habitat Restoration and Mitigation Plan described in MM BR-3. All permanently impacted areas shall be mitigated using methods described in MM BR-3. Where riparian vegetation or aquatic features would be impacted by project construction activities, SCE shall also consult with USACE, RWQCB, and CDFW to determine if a CWA Section 404 permit, CWA Section 401 permit, and LSAA pursuant to California Fish and Game Code Section 1600 would be necessary, respectively. If USACE, RWQCB, or CDFW determines a permit is required, the permit will be obtained prior to impacts and SCE will comply with all terms and conditions of the agreement. In addition, the USACE, RWQCB, and CDFW shall be provided the opportunity to review and comment on the Habitat Restoration and Mitigation Plan if impacts will occur in an area that may be under their jurisdiction. Mitigation requirements described under number 2 above for impacts to riparian habitat or aquatic features may be satisfied by demonstrating compliance with equal or more effective permit conditions, with approval by the CPUC. 	<p>CPUC verifies that a qualified botanist has been consulted to determine the minimum amount of vegetation to be removed, temporary impacts are restored according to the Habitat Restoration and Monitoring Plan, and permanent impacts are mitigated according to methods described in MM BR-3. CPUC may also determine that the above mitigation requirements are satisfied by compliance with permit conditions.</p> <p>CPUC also verifies that USACE, RWQCB, and CDFW are consulted to determine if a permit is necessary.</p>	<p>Prior to Construction – Consult with botanist to determine appropriate amount of vegetation removal. Post-Construction – Restore and/or mitigate temporary and permanent impacts.</p>	<p>All project areas containing riparian habitat and aquatic features.</p>
<p>MM BR-15: Avian Protection Plan. SCE shall adhere to recommendations published by APLIC (Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012)). In addition SCE shall develop and implement an Avian Protection Plan according to Avian Protection Plan Guidelines (APLIC and USFWS 2005). SCE will implement and provide the CPUC with the USFWS approved company-wide APP. The plan shall include provisions to reduce impacts on avian species during operation of the proposed project, and shall provide for the adaptive management of project-related issues. The plan shall be submitted for review to CDFW, USFWS, and the CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented.</p>	<p>The plan shall be submitted for review to the CDFW, USFWS, and CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented.</p>	<p>Prior to Construction – Develop an Avian Protection Plan. During Construction – Implement the Avian Protection Plan.</p>	<p>Entire project area.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
Cultural and Paleontological Resources			
<p>APM-CUL-01: Paleontological Resources Management Plan. A Paleontological Resources Management Plan would be developed for construction within areas that have been identified as having a moderate and high sensitivity for paleontological resources. The Paleontological Resources Management Plan would be prepared by a professional paleontologist in accordance with the recommendations of the Society of Vertebrate Paleontology.</p>	<p>CPUC verifies a Paleontological Resources Management Plan is developed by a professional paleontologist.</p>	<p>Prior to Construction – Develop a Paleontological Resources Management Plan. During Construction. Implement the Paleontological Resources Management Plan.</p>	<p>Project areas that have been identified as having a moderate or high sensitivity for paleontological resources.</p>
<p>MM CR-1: Flag and Avoid Known Unevaluated Historic Sites. Prior to commencement of any construction or construction-related activities within 50 <u>10</u> feet of the mapped boundaries of (1) the historic-era debris and concrete structure at site P-19-186889 and (2) the concrete footings and shack at site SAY-S-1, a qualified CPUC-approved archaeologist shall erect flagging to create a 50 <u>10</u>-foot buffer around these resources. Flagging shall be in a bright, easily visible color, and signs shall be posted at the perimeter of the flagged areas on all sides to indicate that construction equipment, materials, and personnel shall stay out of the flagged areas. Flagging and signage shall stay in place until all construction activities within 50 <u>10</u> feet of the resources has been completed. <u>If the historic-era debris and concrete structure at site P-19-186889 are evaluated and found not to be a historical resource or not contribute to the eligibility of a historical resource, no further management is required during construction. If the concrete footings and shack at site SAY-S-1 are evaluated and found not to be a historical resource or not contribute to the eligibility of a historical resource, no further management is required during construction.</u></p>	<p>CPUC verifies an archaeologist has erected flagging at appropriate locations.</p>	<p>Prior to Construction</p>	<p>All project areas where construction activities are occurring within 50 <u>10</u> feet of the mapped boundaries of (1) the historic-era debris and concrete structure at site P-19-186889 and (2) the concrete footings and shack at site SAY-S-1.</p>
<p>MM CR-2: Worker Training for Cultural and Paleontological Resources. Prior to commencement of any project-related construction activities, all SCE, contractor, and subcontractor project personnel shall receive training regarding:</p> <ul style="list-style-type: none"> • Appropriate work practices necessary to effectively implement the APMs and mitigation measures and to comply with the applicable environmental laws and regulations. • The potential for exposing subsurface cultural resources and paleontological resources . • How to recognize possible buried resources. <p>This training shall include a presentation of:</p> <ul style="list-style-type: none"> • Procedures to be followed upon discovery or suspected discovery of historic or archaeological materials, including Native American remains and their treatment. • Procedures to be followed upon discovery or suspected discovery of paleontological resources. • Actions that may be taken in the case of violation of applicable laws. 	<p>CPUC verifies all SCE, contractor, and subcontractor project personnel have received worker training for cultural and paleontological resources.</p>	<p>Prior to Construction</p>	<p>Entire project area.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM CR-3: Previously Unidentified Cultural Resources. If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an “environmentally sensitive area.” Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/archaeologist qualified archaeologist, <u>SCE</u>, and the CPUC shall be notified immediately.”</p> <p>Preservation in place (i.e., avoidance) is the preferred method of mitigation for impacts on cultural resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archeologist <u>and</u> SCE determines that another method would provide superior mitigation of impacts to the resource. If the resource can be completely avoided, no additional mitigation is necessary. If the resource cannot be completely avoided, the CPUC-approved cultural resources specialist/qualified archaeologist <u>and</u> <u>SCE</u> shall follow the procedures delineated below for resources where it is not known whether the resource is historical. If an unanticipated resource is avoided, it shall nonetheless be recorded on DPR 523 forms, which shall be filed at the Eastern Information Center.”</p> <ul style="list-style-type: none"> • Determination if a resource is an historical resource. The CPUC-approved cultural resources specialist/qualified archaeologist <u>and</u> <u>SCE</u>, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historical resource, the qualified archaeologist <u>and</u> <u>SCE</u> shall prepare an Evaluation Plan. • Evaluation Plan. The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the historical resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan shall describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations (including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an historical resource. If the discovery is not found to be an historical resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an historical resource, SCE shall prepare a Data Recovery Plan. • Data Recovery Plan. Data Recovery Plans for historical resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section 21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods, samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it an historical resource, and reporting procedure. This plan shall be submitted to the CPUC for review and approval. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared. • Data Recovery Field Memo. Following implementation of the Data Recovery Plan, the Data Recovery Field Memo shall be prepared. The Data Recovery Field Memo shall briefly describe the data recovery procedures in the field and summarize (at a field catalog level) the materials recovery. The Data Recovery Field Memo shall also identify the number and kind of samples recovered that are appropriate for special analyses, including radiocarbon dating, obsidian sourcing, pollen analysis, microbotanical analysis, and others, as applicable. The Data Recovery Field Memo shall be submitted to CPUC for review and approval. Once the Data Recovery Field Memo has been approved, protective barriers may be removed, and work may proceed in the area of the discovery. A Data Recovery Report shall then be prepared. • Data Recovery Report. Within 90 days of submittal of the Data Recovery Field Memo, a Data Recovery Report shall be prepared presenting the results of the data recovery program, including a description of field methods, location and size of excavation units, analysis of materials recovered (including results of any special analyses conducted), and conclusions drawn from the work. The Data Recovery Report shall also indicate where artifacts, samples, and documentation resulting from the data recovery program will be curated. The curation facility shall meet the requirements of 36 Code of Federal Regulations 79. The Data Recovery Report shall be submitted to the CPUC for review and approval. Once approved, the Data 	<p>CPUC verifies that work has been halted and that protective barriers have been installed. CPUC verifies that a Data Recovery Field Memo is prepared and a Data Recovery Report is prepared and submitted to CPUC for review and approval. CPUC shall also verify that all impacted known resources and all unanticipated resources shall be recorded on DPR 523 forms that shall be filed at the Eastern Information Center with the Data Recovery Report. If an Evaluation Plan is needed, CPUC shall verify it has been prepared with appropriate measures.</p>	<p>During Construction</p>	<p>Entire project area.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM CR-4: Paleontological Resources Monitoring. Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor all ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources, <u>per the Paleontological Resources Management Plan (APM-CUL-01) reviewed and approved by the CPUC prior to of construction.</u> The paleontological monitor shall have the authority to halt construction in the vicinity of any potential paleontological resource finds to begin implementation of MM CR-75.”.</p>	<p>SCE shall retain a qualified paleontologist, approved by the CPUC.</p>	<p>During Construction</p>	<p>Construction areas with a moderate to high potential to contain paleontological resources.</p>
<p>MM CR-5: Follow Paleontological Resource Discovery Protocol. In the case that a previously unknown paleontological resource is discovered during construction activities, all work within 15 meters of the resource shall be stopped, and the CPUC-approved paleontologist shall <u>consult with the applicant</u> to determine whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, the paleontologist shall determine whether the resource is unique under Part V of CEQA Guidelines Appendix G. A paleontological resource shall be considered unique if it meets the definition of a significant paleontological resource under the 2010 Society of Vertebrate Paleontology <i>Standard Procedures for the Assessment of Adverse Impacts to Paleontological Resources</i> definition:</p> <p>Significant paleontological resources are fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogentic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).</p> <p>Substantiation of the uniqueness conclusion shall be provided to the CPUC for review and approval. If the resource is determined not to be unique, work may commence in the area.</p> <p>If the resource is unique, then work shall remain stopped, and the approved paleontologist shall consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved cultural resources specialist/qualified archaeologist paleontologist in consultation with the applicant determines that another method would provide superior mitigation of impacts to the resource. Other methods include ensuring that the fossils are recovered, prepared, identified, catalogued, and analyzed according to current professional standards under the direction of a qualified paleontologist. Methods of recovery, testing, and evaluation shall adhere to current professional standards for recovery, preparation, identification, analysis, and curation, such as the 2010 Society of Vertebrate Paleontology <i>Standard Procedures for the Assessment of Adverse Impacts to</i></p>	<p>CPUC verifies that the Paleontological Resource Discovery Protocol is followed, including CPUC review and approval of the uniqueness conclusion for the resource and the methods for recovery of the resource.</p>	<p>During Construction</p>	<p>Entire project area.</p>
<p>MM CR-6: Unanticipated Discovery of Human Remains. In the event that human remains or suspected human remains are identified, SCE shall comply with California law, including, but not limited to, the following provisions: CEQA Guidelines section 15064.5(e); PRC sections 5097.94, 5097.98, and 5097.99; and California Health and Safety Code section 7050.5. These laws require Native American consultation for Native American burial sites.</p> <p>The area where the remains are identified shall be flagged off, and all construction activities within 165 feet (50 meters) of the find shall immediately cease. The CPUC, the CPUC-approved cultural resources specialist/archaeologist, SCE, and any other appropriate agency shall be immediately notified, and the cultural resources specialist/archaeologist shall examine the find. If the cultural resources specialist/archaeologist determines that there may be human remains, SCE shall immediately contact the Medical Examiner at the Los Angeles County Coroner’s office. The Medical Examiner has two working days to examine the remains after being notified by SCE. If the Medical Examiner believes the remains are Native American, he/she shall notify the NAHC within 24 hours.</p> <p>The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the remains, and the MLD has 48 hours to make recommendations to the landowner or representative for the respectful treatment or disposition of the human remains and any associated grave goods. If the MLD does not make recommendations within 48 hours, the area of the property shall be secured from further disturbance. If there are disputes between the landowners and the MLD, the NAHC shall mediate the dispute and attempt to find a solution. If the mediation fails to provide measures acceptable to the landowner, the landowner or their representative shall reinter the remains and associated grave goods and funerary objects in an area of the property secure from further disturbance. The location of any reburial of Native American human remains shall not be disclosed to the public and shall not be governed by public disclosure requirements of the California Public Records Act, California Government Code § 6250 et seq., unless otherwise required by law. The Medical Examiner shall withhold public disclosure of information related to such reburial pursuant to the specific exemption set forth in California Government Code Section 6254(r).</p>	<p>In the event that human remains are identified, the CPUC, the CPUC-approved cultural resources specialist/archaeologist, SCE, and any other appropriate agency shall be immediately notified. CPUC shall verify that SCE immediately contacts the medical examiner at the Los Angeles County Coroner’s Office.</p>	<p>During Construction</p>	<p>Entire project area.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
Geology, Soils, and Minerals			
<p>MM GEO-1: Geotechnical Investigation. The applicant will conduct a geotechnical investigation for the proposed project and prepare a geotechnical report documenting the results of the investigation. The geotechnical investigation shall assess the potential for liquefaction, landslides, lateral spreading, seismic ground shaking, and expansive soil. The geotechnical report shall make recommendations of engineering and design measures to incorporate into the proposed project, determined appropriate by a California-licensed Geotechnical Engineer or Certified Engineering Geologist, to mitigate impacts associated with liquefaction, landslides, lateral spreading, seismic ground shaking, and expansive soils. Measures that may be used to minimize impacts could include, but are not limited to:</p> <ul style="list-style-type: none"> • <i>Liquefaction:</i> stabilization of fills, retaining walls, slope coverings, removal of unstable materials, avoidance of highly unstable areas, construction of pile foundations, and/or ground improvements of liquefiable zones. • <i>Landslides and lateral spreading:</i> retaining walls, excavation of unstable materials, avoidance of highly unstable areas. • <i>Seismic ground shaking:</i> energy dissipating devices, bracing, bolting of foundations. • <i>Expansive soil:</i> excavation of expansive soil, draining water away from expansive soils, ground-treatment processes. <p>SCE shall provide documentation to the CPUC prior to construction that demonstrates these measures have been incorporated into project design.</p>	<p>SCE shall provide documentation to the CPUC prior to construction that demonstrates these measures have been incorporated into project design.</p>	<p>Prior to Construction</p>	<p>Entire project area.</p>
Hazards and Hazardous Materials			
<p>MM HZ-1: Hazardous Materials Business Plan. A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on:</p> <ul style="list-style-type: none"> • Hazardous materials stored at the Mesa Substation over threshold quantities. • A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points. • Emergency response plans for release and threatened release of the covered materials. <p>The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.</p> <p>In the event that the mitigation measure is not removed, please modify language to reflect SCE’s submittal process for HMBPs.</p> <p>M HZ-1: Hazardous Materials Business Plan. A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on:</p> <ul style="list-style-type: none"> • Hazardous materials stored at the Mesa Substation over threshold quantities. • A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points. • Emergency response plans for release and threatened release of the covered materials. <p>The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.</p> <p><u>The HMBP must be submitted at least 30 days prior to storage of covered hazardous materials via the California Environmental Reporting System (CERS). A receipt, showing that the agency received the Plan, must be submitted to the CPUC prior to storage of covered hazardous materials.”</u></p>	<p>The Hazardous Materials Business Plan and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials.</p>	<p>Prior to Construction</p>	<p>Wherever hazardous materials over 55 gallons, 200 cubic feet, or 500 pounds are stored.</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>“MM HZ-2: Hazardous Materials Training. Prior to construction, the applicant will prepare and implement a worker environmental awareness program (WEAP) for CPUC review and approval that includes:</p> <ul style="list-style-type: none"> • Instruction regarding the location of Material Safety Data Sheets, as well as proper labeling, storage, use, transport, and disposal of hazardous materials. • Information on common contaminants that could be uncovered in the proposed project area and instruction regarding appropriate procedures if potentially contaminated soil is present. • Procedures for spill response <u>will be in compliance with existing laws and regulations under the SPCC (MM HZ-3)</u> including notification to appropriate personnel, including the Spill Response Coordinator in case of a hazardous materials spill or leak from equipment, or upon the discovery of soil or groundwater contamination. • Instruction on individual responsibilities under the Clean Water Act, the project SPCC, the project SWPPP, and site-specific BMPs. • Instruction on compliance with OSHA regulations and procedures if landfill gas is encountered during excavations. 	<p>CPUC verifies Hazardous Materials Training has been prepared and administered, and that SCE maintains records documenting attendees at each training.</p>	<p>Prior to Construction.</p>	<p>Entire project area.</p>
<p>MM HZ-3: Spill Prevention, Control, and Countermeasure Plan. SCE shall prepare a site-specific SPCC plan that identifies spill response and prevention measures and BMPs. SCE shall indicate site-specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction for review and approval.</p> <p>In the event that the mitigation measure is not removed, please modify language to reflect SCE’s submittal process for SPCC.</p> <p>MM HZ-3: Spill Prevention, Control, and Countermeasure Plan. SCE shall prepare a site-specific SPCC plan that identifies spill response and prevention measures and BMPs. SCE shall indicate site-specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction <u>delivery of any additional transformer oil to the site for review and approval.</u></p>	<p>SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC plan, including implementation of BMPs. SCE shall submit the SPCC to CPUC at least 30 days prior to construction for review and approval.</p>	<p>Prior to Construction – Prepare a SPCC plan. During and Post construction – Implement <u>Submit the SPCC plan</u></p>	<p>Entire project area.</p>
<p>MM HZ-4: Contaminated Soil Contingency Plan. Prior to construction, the applicant will submit a Contaminated Soil Contingency Plan to the CPUC for review and approval. The plan will include practices that are consistent with the California Title 8 and Occupational Safety and Health Administration (Cal-OSHA) regulations and will outline steps that would be implemented if contaminated soils are encountered. The objective of the plan will be to minimize risk to the public and to the environment resulting from exposure to and disturbance of contaminated soils. At a minimum, the plan would include procedures for the following steps:</p> <ul style="list-style-type: none"> • Identifying potentially impacted soil; • Establishing a no-work zone for potentially contaminated areas; • Assessing potentially impacted soil; • Notifying appropriate agencies, • Cleanup procedures; • Impacted soil storage; • Verification sampling; and, • Impacted soil characterization and disposal. <p>During construction an appropriately trained construction personnel, under the supervision of a California licensed registered geologist or professional engineer, will be present to monitor soil conditions during all earthmoving activities. If potentially contaminated soils are encountered during construction, the applicant would implement the Contaminated Soil Contingency Plan to assess the soils and to determine appropriate procedures based on the nature of the contamination, which may include avoidance or collection and analysis to determine appropriate disposal or treatment options.</p>	<p>Prior to construction, the applicant will submit a Contaminated Soil Contingency Plan to the CPUC for review and approval. During construction, CPUC shall verify that an appropriately trained construction personnel, under the supervision of a California licensed registered geologist or professional engineer, will be present to monitor soil conditions during all earthmoving activities.</p>	<p>Prior to Construction – Develop a Contaminated Soil Contingency Plan. During Construction – Implement the Contaminated Soil Contingency Plan.</p>	<p>Entire project area.</p>
<p>MM HZ-5: Well Management Plan. Prior to construction, the applicant will prepare and submit to CPUC a Well Management Plan in coordination with Oil Landfill and the U.S. EPA in order to prevent contamination of groundwater and subsurface soil. The plan will include procedures for well</p>	<p>Prior to construction, the applicant will prepare and</p>	<p>Prior to Construction</p>	<p>All project areas containing monitoring wells.</p>

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APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>decommissioning or protection for all monitoring wells located within the footprint of the proposed project. The plan will be reviewed and approved by CPUC prior to construction. Proper well decommissioning or protection/avoidance measures would be implemented prior to beginning other ground disturbing activities within the proposed Mesa Substation site area. The Well Management Plan would address the following:</p> <ul style="list-style-type: none"> • Identification of wells that would be avoided during construction and wells that would be decommissioned, • Well decommissioning schedule, • Well decommissioning procedures, • Procedures for the protection of wells that are to be avoided during construction, • Procedures for granting access to OII Landfill's monitoring wells during construction activities. Procedures should address compliance to the proposed project's APMs and MMs. 	<p>submit to CPUC a Well Management Plan in coordination with OII Landfill and the EPA. The plan will be reviewed and approved by CPUC prior to construction.</p>		
Hydrology and Water Quality			
<p>MM HY-1: Stormwater Pollution Prevention Plan. The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats. • If visible dust is present during construction activities, standard dust suppression techniques (e.g., water spraying) will be used in all ground disturbance areas. • During construction activities, measures would be in place to ensure that contaminants are not discharged from construction sites. The SWPPP would define areas where hazardous materials and trash would be stored; where vehicles would be parked, fueled and serviced; and where construction materials would be stored. • Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures will be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities. • Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, these maintenance activities shall be performed at least 150 feet from all aquatic resources or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials would be cleaned up immediately and contaminated soils removed to approved disposal areas. • Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system • Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. <p>Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction.</p> <p>In the event that the MM HY-1 is not removed as requested. Please modify the language as follows.</p> <p>MM HY-1: Stormwater Pollution Prevention Plan. The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water</p>	<p>Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the CPUC at least 30 days prior to start of construction.</p>	<p>Prior to Construction – Prepare an SWPPP. During Construction – Implement the SWPPP.</p>	<p>Entire project area.</p>

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APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> The applicant shall not stockpile brush, loose soils, excavation spoils, or other similar debris material within sensitive habitats. If visible dust is present during construction activities, standard dust suppression techniques (e.g., water spraying) will be used in all ground disturbance areas. During construction activities, measures would be in place to ensure that contaminants are not discharged from construction sites. The SWPPP would define areas where hazardous materials and trash would be stored; where vehicles would be parked, fueled and serviced; and where construction materials would be stored. Runoff, sedimentation, and erosion <u>control measures would be implemented in compliance with the Storm Water Pollution Prevention Plan (SWPPP) which contains the Best Management Practices (BMPs) that would be implemented to prevent and control sedimentation and erosion during construction and to protect storm water runoff. The SWPPP will be site-specific and prepared in compliance with the Construction General Permit. would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures will be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent properties.</u> BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities Equipment storage, fueling, and staging areas would be located in upland sites away from riparian areas or other sensitive habitats. These designated areas would be located in such a manner as to prevent any runoff from entering sensitive habitat. Where vehicle maintenance (excluding fueling) cannot be avoided in areas outside those previously specified, these maintenance activities shall be performed at least 150- <u>50 feet, if feasible,</u> from all aquatic resources or as specified by agency permits, on an impermeable bladder or tarp specified for such maintenance activities. Project-related spills of hazardous materials would be cleaned up immediately and contaminated soils removed to approved disposal areas. Implement measures such as sandbags, silt screens, cleanup of spills of hazardous materials, and cleanup of sediment to prevent polluted (with sediment or hazardous materials) runoff from work areas in paved streets from entering the storm drain system Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems. <p>Verification of Construction General Permit coverage <u>obtained from the State Water Resources Control Board (SWRCB) approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. The SWPPP will be kept onsite and will be made available upon request.</u> Updated SWPPPs will be provided to the CPUC on request during construction."</p>			
<p>MM HY-2: Compliance with WDRs. Work in waters of the state shall be conducted in conformance with WDRs obtained for the proposed project. Mitigation measures shall be implemented in accordance with WDRs, and they may include avoidance, reduction, or compensatory measures.</p> <p>Groundwater extracted as a result of dewatering during construction shall not be discharged to Waters of the State unless such activities are covered by a WDR. Extracted groundwater shall be disposed of in one of the following manners in the absence of a WDR:</p> <ul style="list-style-type: none"> Discharge to an upland area where it will not enter Waters of the State but would instead evaporate or infiltrate. Use for dust control. Use for irrigation water. Use for other construction needs. Dispose of at a licensed facility if water is suspected of being contaminated or degraded. 	<p>CPUC verifies that all work within waters of the state are conducted in conformance with WDRs, and that appropriate mitigation measures are implemented in accordance with WDRs.</p>	<p>During Construction</p>	<p>All areas where construction would occur within waters of the state.</p>
<p>MM HY-3: Construction Drainage Plan. SCE shall prepare and implement a Drainage Plan that ensures runoff during construction activities at the Mesa Substation site will not exceed drainage capacity of the storm water system and other drainage facilities. Measures that can be employed can include:</p>	<p>SCE shall submit the plan to Monterey Park and CPUC for</p>	<p>Prior to Construction – Prepare a Drainage Plan.</p>	<p>Mesa Substation site</p>

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Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<ul style="list-style-type: none"> Constructing the detention basin earlier in construction. Constructing temporary detention basins on site. Creating infiltration areas to limit runoff that enters the storm water system. <p>SCE shall submit the plan to Monterey Park and CPUC for review and approval prior to beginning construction activities at the substation site. <u>SCE will provide a copy of the grading permit to the CPUC.</u></p>	<p>review and approval prior to beginning construction activities at the substation site.</p>	<p>During Construction – Implement the Drainage Plan.</p>	
<p>MM HY-4: Detention Basin Design. SCE shall design the detention basin on the proposed Mesa Substation site in accordance with the <u>City of Monterey Park requirements Los Angeles County Department of Public Works Hydrology Manual (LACDPW2006)</u>. The Hydrology Manual contains techniques to calculate runoff flow rates and volumes based on Los Angeles County’s historic precipitation and runoff. As applicable, the detention basin shall be designed in accordance with the <u>City of Monterey Park requirements Los Angeles County Department of Public Works Low Impact Development Standards Manual (LACDPW2014).</u></p>	<p>CPUC shall verify that the detention basin is designed in accordance with the Los Angeles County Department of Public Works Hydrology Manual prior to beginning construction of the proposed project.</p>	<p>Prior to Construction</p>	<p>Mesa Substation site</p>
<p>MM HY-5: Dam Failure Evacuation Training. As part of the Worker Environmental Awareness Program, SCE shall train construction workers on evacuation routes in the event of dam failure. Workers to be trained shall include those located in the dam inundation areas of the Garvey Reservoir south dam, Eaton Canyon Dam, Garvey Reservoir north dam, and Santa Fe Dam.</p>	<p>CPUC shall verify that SCE trains all construction workers located in the dam inundation areas of the Garvey Reservoir south dam, Eaton Canyon Dam, Garvey Reservoir north dam, and Santa Fe Dam on evacuation routes in the event of dam failure prior to construction of the proposed project.</p>	<p>Prior to Construction</p>	<p>Work located within dam inundation areas of the Garvey Reservoir south dam, Eaton Canyon Dam, Garvey Reservoir north dam, and Santa Fe Dam.</p>
<p>MM HY-6: Dam Inundation Substation Protection. SCE shall incorporate dam inundation measures into its substation at the design phase to reduce the potential for widespread outages and equipment damages in the event of failure of the south dam at Garvey Reservoir. Measures could include:</p> <ul style="list-style-type: none"> Concrete perimeter wall and flood gates at entry ways; Elevation of key substation equipment above inundation levels; or Sealing of equipment buildings. 	<p>CPUC shall verify that dam inundation measures are incorporated in the substation at its design phase.</p>	<p>Prior to Construction</p>	<p>All project areas located within the inundation areas of the south dam at Garvey Reservoir.</p>
Noise and Vibration			
<p>MM NV-1: Noise Control Plan. Prior to the start of construction, the applicant shall prepare a Noise Control Plan to ensure that reduce project construction noise, does not:</p> <ul style="list-style-type: none"> Increase ambient noise levels by more than 10 dBA (8-hour Leq), or Exceed the noise level specified in the applicable jurisdiction’s noise ordinance. <p>The Noise Control Plan measures shall will be selected based on <u>the specific equipment used and, activity conducted, and proximity to sensitive noise receptors once known.</u> The applicant shall submit the Noise Control Plan to the CPUC at least 30 days prior to the start of construction for review <u>and approval.</u> The Noise Control Plan will shall include, but not be limited to, <u>consider</u> the following noise reduction and control measures:</p> <ul style="list-style-type: none"> Temporarily <u>and safely</u> install and maintain an absorptive noise control barriers <u>placed between stationary construction equipment and sensitive noise receptors,</u> in the perimeter of construction sites located within 200 feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers and ensure such barriers are installed in a safely manner. Limit heavy heavy-equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity. <u>Efforts will be made to</u> ensure that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition. <u>Maintain</u> <u>Efforts will be made to maintain</u> construction equipment according to manufacturer recommendations. Minimize construction equipment idling <u>to the extent feasible.</u> Reduce noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimizes the need for back-up alarms and use flagmen to minimize the time needed to back up vehicles. When possible, use construction equipment specifically designed for low noise emissions (i.e. e.g., equipment that is powered by electric or natural 	<p>Verify identification of a Construction Relations Officer and mailing of notices at least 30 days prior construction. <u>Review Submit</u> monthly reports to the CPUC Verify implementation of noise control measures.</p>	<p>Prior to Construction – Prepare a Noise Control Plan. During Construction – Implement the Noise Control Plan.</p>	<p>Entire project area.</p>

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APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>gas engines instead of diesel or gasoline reciprocating engines). Electric engines have been reported to have lower noise levels than internal combustion engines.</p> <ul style="list-style-type: none"> Where practical, locate stationary equipment such as compressors, generators, and welding machines away from sensitive receptors or behind barriers. <p>The Noise Control Plan shall will detail the frequency, location, and methodology for noise monitoring prior to and during various construction and restoration activities to ensure that reduce generated noise levels do not exceed 10 dBA above existing ambient noise levels, or the applicable jurisdiction noise standards. These methods shall include monitoring noise levels at the boundary of construction areas and using industry-standard computer noise modeling techniques to predict noise levels at adjacent sensitive noise receptors. Should the modeled levels exceed the standards in the applicable jurisdiction's noise standards, noise monitoring near the sensitive receptors shall be conducted to verify the modeling results. The Noise Control Plan shall detail the actions and procedures that the applicant shall implement to mitigate impacts in the event that monitoring detects noise levels that have exceeded the criteria specified in this EIR. Noise level measurements shall be conducted in compliance with the City of Monterey Park, City of Montebello, City of Commerce, City of Bell Gardens, City of Pasadena, and Los Angeles County requirements local agency requirements, if available.</p> <p>The Noise Control Plan shall will designate a Construction Relations Officer who is readily available to answer questions or respond to complaints during active any hours or days that construction or restoration periods is occurring. The applicant shall send pre-construction notifications to sensitive receptors located within 100 feet of construction activities at least 30 days prior construction. The notification shall include a phone number for the public to contact the Construction Relations Officer. Additionally, each construction site shall include clearly visible signs with the Construction Relations Officer's public phone number. The applicant shall submit monthly reports to the CPUC summarizing the complaints submitted to the Construction Relations Officer. The summary reports shall describe how each complaint was addressed, if and when it was resolved, and the contact information for the member of the public who submitted the complaint, if available."</p>			
<p>MM NS-2: Compliance with Monterey Park Ordinance. As soon as Mesa Substation is fully operational, the applicant shall conduct noise measurements to ensure that the operational noise levels from the substation transformers do not exceed the City of Monterey Park's 50 dBA nighttime noise standard at the closest receptor. If the threshold is exceeded, the applicant shall implement engineering solutions, including, but not limited to, barrier walls around the transformer, sound absorbing panels, and/or noise cancellation methods until the project does not exceed the threshold. SCE must submit the noise measurements in the form of a memorandum to the CPUC within two weeks of measurement. Reports shall be submitted until the CPUC verifies that operation noise does not exceed the City of Monterey Parks' 50 dBA nighttime threshold.</p>	<p>SCE must submit the noise measurements in the form of a memorandum to the CPUC within two weeks of measurement. Reports shall be submitted until the CPUC verifies that operation noise does not exceed the City of Monterey Parks' 50-dBA nighttime threshold.</p>	<p>Post-construction</p>	<p>Mesa Substation site</p>
<p>MM NS-3: Noise from Helicopter Operations. For all construction activities that would include helicopter operations, SCE shall provide at least one week's advance notice to all property owners within 660 feet of the proposed helicopter operation areas. The announcement would state that the use of helicopters is anticipated and would provide the start date, anticipated completion dates, hours of helicopter usage, and a telephone contact number for questions or complaints during construction. In addition, helicopters would maintain a height of at least 500 feet when passing over residential areas, as well as a lateral distance of at least 500 feet from all schools and hospital buildings, except when they are at construction areas or actively assisting with construction activities.</p>	<p>The CPUC shall verify that notice to all property owners within 660 feet of the proposed helicopter operation areas is provided at least one week prior to helicopter operation.</p>	<p>Prior to Construction – provide notice at least 7 days prior to helicopter operation.</p>	<p>All project areas in which helicopter operations would occur.</p>
<p>MM NV-4: Positioning of Helicopter Landing and Takeoff Areas. SCE shall position helicopter landing and takeoff areas in Staging Yards 1, 2, and 3, and 4 as far away as feasible from sensitive receptors, while not sacrificing the safety of helicopter operations due to hazards (e.g., transmission lines) in and around the staging yards.</p>	<p>SCE must submit helicopter locations to the CPUC for review and approval at least 30 days prior to use of the helicopter location.</p>	<p>Prior to Construction</p>	<p>Helicopter take-off and landing areas.</p>
<p>MM NS-5: Noise Notification and Coordination for Whittier Narrows Natural Area. The applicant shall provide notice to the Whittier Narrows Natural Area at least 30 days prior to construction activities occurring in that area to alert nearby users of the construction activities and give them the opportunity to avoid the noise. The notice shall include dates, times, and descriptions of construction activities, in addition to directions to at least two comparable alternative nearby recreational facilities. The applicant shall also coordinate with the Whittier Narrows Natural Area to ensure that activities causing an increase in noise of over 10 dBA above ambient noise levels do not occur in the Whittier Narrows Natural Area during any planned special events. SCE shall provide documentation of the notice and coordination to the CPUC at least 20 days prior to construction.</p>	<p>SCE shall provide documentation of the notice and coordination to the CPUC at least 20 days prior to construction. The CPUC shall verify that notice has been provided to Whittier Narrows at least 30 days prior to construction and that coordination has occurred such that noise levels do not violate identified maximums.</p>	<p>Prior to Construction</p>	<p>Whittier Narrow Natural Area</p>
Public Services and Utilities			
<p>MM PS-1: Relocation Agreement with Municipal Water District. Prior to construction that would take the MWD's 72-inch Middle Feeder Pipeline out of</p>	<p>SCE shall submit to the CPUC</p>	<p>Prior to Construction</p>	<p>Main project area.</p>

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APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>service, the applicant shall reach an agreement with the MWD that will identify an alternate alignment that crosses the project site. This relocation agreement will enable the MWD to maintain reliable deliveries of treated water to its member agencies during relocation of the pipeline. SCE shall submit to the CPUC information from the MWD confirming that relocation of the pipeline will not result in inability to adequately serve customers. SCE shall submit this documentation at least 30 days prior to the pipeline being taken out of service.</p>	<p>information from the MWD confirming that relocation of the pipeline will not result in inability to adequately serve customers. SCE shall submit this documentation at least 30 days prior to the pipeline being taken out of service.</p>		
Traffic and Transportation			
<p>MM TT-1: Traffic Control Plan.</p> <p>The Plan shall be consistent with the California Joint Utility Traffic Control Manual (CJUTCM) and include, at a minimum, measures to ensure that:</p> <ol style="list-style-type: none"> 1. Significant impacts to affected intersections during the AM or PM peak hours (and during the specified phase) are reduced to less than significant levels, i.e., reduce the V/C increase resulting from the proposed project at each identified intersection to at or below the applicable threshold. <p>Primary measures may include:</p> <ul style="list-style-type: none"> • Limiting project-related heavy truck trips during peak hours (e.g., through scheduling deliveries outside of peak hours) so as to reduce trips occurring during peak hours; and • Limiting project construction worker vehicle trips during peak hours (e.g., through requiring carpooling) so as to reduce trips occurring during peak hours. <ol style="list-style-type: none"> 2. General plans or guidelines be developed to provide safety for motorists, bicyclists, pedestrians, workers, enforcement/emergency officials and equipment in consideration of basic safety principles to route roadway users through construction zones using roadway geometrics and features and traffic control devices comparable to normal roadway situation as possible. The Plan detail shall be appropriate to the complexity of the project work. 3. Roadway user movement should be inhibited as little as practical, based on the recommended considerations of the California Manual on Uniform Traffic Control Devices (CA MUTCD) latest edition, including proper signage, avoiding abrupt changes in geometrics, reducing traffic volume by using alternate routes scheduling work in off-peak hours, and complying with the Americans with Disabilities Act of 1990 (ADA). 4. During truck delivery and exit hours, SCE shall post slow truck warning signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the CA MUTCD. 5. Motorists, bicyclists and pedestrians are guided in a clear and positive manner while approaching and traversing TTC zones and incident sites, applying the principles for proper marking, signing, and flagging. 6. Acceptable levels of operations are provided and routine day and night inspections of Plan elements are implemented. 7. Roadside safety is maintained during the life of the project to accommodate disabled vehicles, run-off-the-road incidents, and emergency situations. 8. Appropriate field workers and management receive training appropriate to the job decisions each individual is required to make. 9. Good public relations are maintained by assessing the needs of the road users, abutting property owners, and emergency service providers (law enforcement, fire fighters, and medical) and cooperating with various news media, SCE shall notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of road closures at least 1 week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE would also make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers, such as keeping metal plates available to cover open trenches. <p>Specific measures would be dependent on the final construction schedule and residing location of construction workers. Measures implemented as part of the plan shall not result in exceedance of applicable thresholds as described in this document at other impacted intersections. The plan shall</p>	<p>A project-specific Traffic Management Plan is prepared by SCE according to provisions identified in this mitigation measure. SCE shall submit the plan for CPUC review and approval at least 60 days prior to the start of construction.</p>	<p>Prior to Construction – Prepare a Peak Period Traffic Management Plan.</p> <p>During Construction – Implement the Peak Period Traffic Management Plan.</p>	<p>Entire project area.</p>

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APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>also demonstrate that mitigation would not result in V/C to exceed thresholds at significantly impacted and non-significantly impacted roads and intersections.”</p>			
<p>MM TT 2: Road and Lane Closure Plan. SCE shall develop a Road and Lane Closure Plan for the proposed project that outlines how SCE will handle road and lane closures to allow for safe vehicle, bicyclist, and pedestrian passage when road and lane closures occur. The Plan shall be prepared in coordination with local jurisdictions where road and lane closures would occur. Upon determination of the final construction schedule and precise locations and durations of road and lane closures, the Plan shall describe locations and durations of:</p> <ul style="list-style-type: none"> • Full road closures • Lane closures • Bicycle lane closures • Sidewalk or pedestrian path closures <p>Measures to be included in the Plan that would allow for safe vehicle, bicyclist, and pedestrian passage shall adhere to the California Manual on Uniform Traffic Control Devices. Potential measures include:</p> <ul style="list-style-type: none"> • Signage directing motorists, pedestrians, and bicyclists to an efficient, safe detour around the closure • Flaggers and/or signage to halt traffic at road closures or direct traffic at lane closures and to allow traffic to pass when construction is halted • Requirements for notifications and a process for communication with affected residents and landowners prior to the start of construction. • Emergency service providers would be notified of the timing, location, and duration of construction activities. • Requirement that emergency vehicle access is maintained at all times. <p>The Road and Lane Closure Plan can be included as part of a Transportation Management Plan for the project.</p>	<p>CPUC verifies that a Road and Lane Closure Plan is developed, and SCE coordinates with local jurisdictions where road and lane closures would occur.</p>	<p>Prior to Construction – Prepare a Road and Lane Closure Plan.</p> <p>During Construction – Implement the Road and Lane Closure Plan.</p>	<p>Roads or lanes that would be closed due to construction.</p>
<p>MM TT 3: Highway Closure Plan. SCE shall prepare a Highway Closure Plan to include in its encroachment permit application for crossings of SR-60 that require closure or partial closure of SR-60. The Highway Closure Plan shall:</p> <ul style="list-style-type: none"> • Specify that partial and complete closures of SR-60 are prohibited during peak and daytime (5 a.m. to 10 p.m.) hours. • Require that SCE adhere to Caltrans’ requirements regarding signage to notify motorists of the impending closure. • Map potential detours for SR-60 traffic. <p>The measures in the plan shall minimize delays to SR-60 traffic. No work shall occur in Caltrans right-of-way until Caltrans issues the encroachment permit and approves the Highway Closure Plan.</p>	<p>The CPUC shall verify that the measures in the Highway Closure Plan are adhered to and that no work shall occur in the Caltrans ROW until Caltrans issues the encroachment permit.</p>	<p>Prior to Construction – Prepare a Highway Closure Plan.</p> <p>During Construction – Implement the Highway Closure Plan.</p>	<p>Crossings of SR-60 that require closure or partial closure of SR-60.</p>
<p>MM TT 4: Helicopter Lift Plan. SCE’s helicopter contractor shall coordinate with FAA and obtain FAA required approvals for helicopter operations. SCE’s contractor’s submittal shall include a Helicopter Lift Plan for operations within 1,500 feet (457 meters) of a congested area or within 1,500 feet (457 meters) of residences in compliance with 14 CFR 133.33, which requires that flights be conducted so emergency landings and release of external load can be accomplished without safety risks to people or property when operating over congested areas. Measures may include:</p> <ul style="list-style-type: none"> • Designating who is responsible for equipment inspections • Communication procedures • Establishment of exclusion zones where pedestrians will not be allowed • Training of personnel in safety requirements and procedures <p>The Plan and record of FAA approval shall be provided to the CPUC prior to commencing helicopter operations.</p>	<p>The Plan and record of FAA approval shall be provided to the CPUC prior to commencing helicopter operations.</p>	<p>Prior to Construction</p>	<p>Areas where helicopters will be used within 1,500 feet of residences.</p>
<p>MM TT 5: FAA No Hazard Determination. SCE shall obtain a determination of no hazard from the FAA when notification under 14 CFR 77 is required for:</p>	<p>SCE shall provide documentation of the FAA finding to the CPUC prior to the use of equipment or</p>	<p>Prior to Construction</p>	<p>All project areas where construction equipment, such as cranes, and structures, such as</p>

D2-266
cont.

D2-267

D2-268

D2-269

D2-270

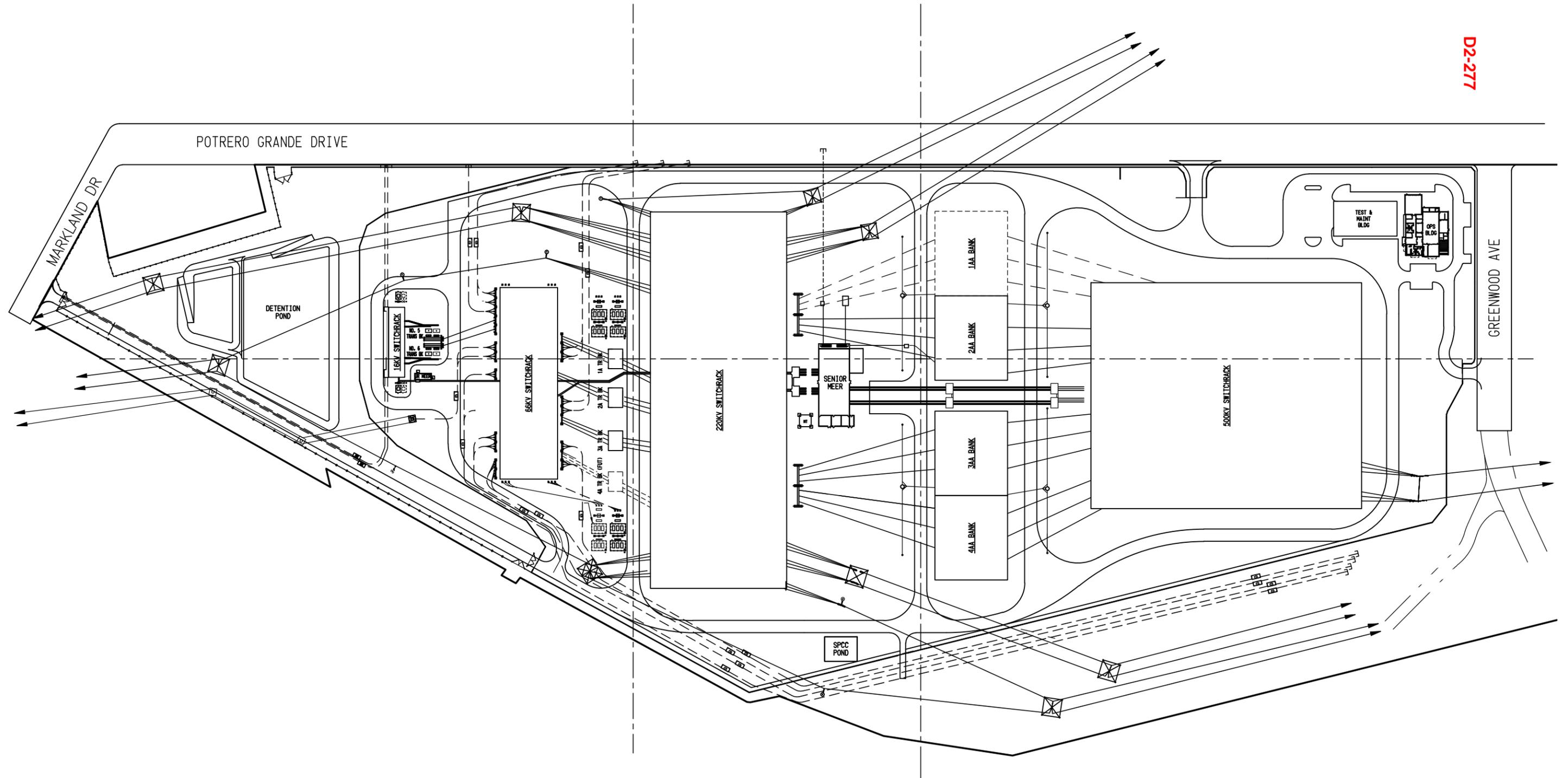
Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location	
<ul style="list-style-type: none"> Use of construction equipment, such as cranes; and Installation of structures, such as lattice steel towers. <p>SCE shall provide documentation of the FAA finding to the CPUC prior to the use of equipment or installation of structures that require notification under 14 CFR 77.</p>	installation of structures that require notification under 14 CFR 77.		steel lattice towers, are being installed.	D2-270 cont.
<p>MM TT 6: Slow Truck Warnings. During truck delivery and exit hours, SCE shall post signage at appropriate locations (e.g., along Potrero Grande Drive) when there is a possibility for slow trucks to exit the substation site to warn drivers of slow trucks exiting the Substation site onto East Markland Drive and Potrero Grande Drive. Signage shall adhere to the California Manual on Uniform Traffic Control Devices.</p>	CPUC shall ensure that SCE posts signage at appropriate locations.	During Construction	Any work area where there is a possibility for slow trucks to exit the substation site.	D2-271
<p>MM TT 7: Road Damage Repair. SCE shall repair to pre-project conditions any roads damaged by project vehicle traffic within 60 days of completion of construction. SCE shall document roadway conditions with photographs prior to the project along roads identified for heavy vehicle use in the project's Traffic Impact Analysis. SCE shall also take photographs after the project and after any repairs that document restoration of pre-project pavement conditions. Documentation of original conditions and repair shall be submitted to the CPUC for review and verification within 30 days of repair completion.</p>	Documentation of original conditions and repair shall be submitted to the CPUC for review and verification within 30 days of repair completion.	Prior to Construction – Document pre-project conditions. Post-construction – Repair roadway damage.	Any roads damaged by project vehicle traffic.	D2-272
<p>MM TT 8: Emergency Service Provider Notification. SCE shall notify local emergency service providers (i.e., police departments, ambulance services, and fire departments) of road closures at least 1 week prior to the closure. SCE shall notify the provider of the location, date, time, and duration of closure. SCE would also make provisions to maintain emergency vehicle access at all times in coordination with local emergency service providers, such as keeping metal plates available to cover open trenches.</p>	The CPUC verifies that SCE has notified all local emergency service providers or road closures at least one week prior to the closure. CPUC also verifies that emergency vehicle access is maintained at all times.	During Construction	All project areas where road closures would occur.	D2-273
<p>MM TT 9: Public Transit, Pedestrian, and Bicyclist Plan. SCE shall develop and implement a Public Transit, Pedestrian, and Bicyclist Plan with the goal of maintaining safe conditions for pedestrians and bicyclists during construction of the proposed project. Safe conditions include detours for closed sidewalks and closed bicycle lanes as well as relocation of transit stops to areas not affected by construction activities. The control measures included in the Plan shall be based on final plans for closures of sidewalks and bicycle lanes and transit stops. The measures shall be consistent with those published in the California Joint Utility Traffic Control Manual (California Inter-Utility Coordinating Committee 2010). The Plan should include, at a minimum, the measures listed below:</p> <ul style="list-style-type: none"> Notify LA Metro and other public transit providers of construction along existing public transit routes. The applicant would work with transit providers to temporarily relocate transit stops during construction, if needed. Provide pedestrians with reasonably safe, convenient, and accessible paths that replicate as nearly as possible the most desirable characteristics of the existing paths (i.e., maintaining sidewalk and bicycle access on at least one side of affected streets during construction). Layout plans for notifications and a process for communication with affected transit riders, pedestrians, and bicyclists prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which transit routes, bus stops, sidewalks, and bicycle routes would be affected on which days and for how long), and a toll-free telephone number for receiving questions or complaints. Post detour signs during construction of alternative routes for pedestrians and bicyclists. Install steel plates over open trenches in inactive construction areas to maintain existing bicycle and pedestrian access after construction hours. 	The CPUC verifies that SCE develops and implements the Public Transit, Pedestrian, and Bicyclist Plan, and the control measures in the Plan are consistent with the California Utility Traffic Control Manual.	Prior to Construction – Develop a Public Transit, Pedestrian, and Bicyclist Plan. During Construction – Implement the Public Transit, Pedestrian, and Bicyclist Plan.	Entire project area.	D2-274
<p>MM TT 10: Whittier Narrows Park and Ride Lot. If proposed project work on Telecommunications Route 3 would result in temporary closure of the Whittier Narrows park and ride lot exit to Durfee Avenue, SCE shall coordinate with Los Angeles County and the Whittier Narrows Recreation Area so that SCE can provide traffic control for two-way traffic at the Santa Anita Avenue entrance to the Whittier Narrows park and ride lot during the Durfee Avenue exit closure.</p>	CPUC verifies that SCE coordinates with Los Angeles County and the Whittier Narrows Recreation Area to provide traffic control during the Durfee Avenue exit closure.	During Construction	Whittier Narrows park-and-ride lot	D2-275

Table 8-1 Draft Mitigation Monitoring and Reporting Plan

APMs and Mitigation Measures	Monitoring Requirements	Timing	Location
<p>MM TT-112: Community Education Center Parking. Pasadena City College Community Education Center Parking. If proposed project work at the Goodrich Substation would result in parking spot closures at the Pasadena City College Community Education Center parking lot, SCE shall will coordinate scheduled closures with the Pasadena City College Community Education Center on the following and shall obtain a letter from the Community Education Center that states:</p> <ul style="list-style-type: none"> • The dates of parking spot closures; • The number of parking spots that would be closed; and • That the Pasadena City College Community Education Center concurs that there will be sufficient parking spots to accommodate SCE’s work and the Pasadena City College Community Education Center’s parking needs. <p>SCE shall will submit the letter provide documentation of the coordination with the Pasadena City College Community Education Center to the CPUC 30 days prior to Pasadena City College Community Education Center parking spot closure.”</p>	<p>SCE shall will submit the letter provide documentation of the coordination to the CPUC 30 days prior to Pasadena City College Community Education Center parking spot closure.</p>	<p>During Construction</p>	<p>Community Education Center parking lot</p>

D2-276



D2-277



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



KOP 3 – Visual Simulation of the Proposed Project

Note: Visual simulation revised June 2016 with updated project data



D2-278
cont.

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



Option 2

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

Note: Visual simulation revised June 2016 with updated project data

ENVIRONMENTAL VISION



**D2-278
cont.**

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



KOP 6 – Visual simulation of the Proposed Project

Note: Visual simulation revised June 2016 with updated project data

ENVIRONMENTAL VISION

Figure 4.1-5h
**KOP 6: Visual Simulation - Updated
View West from the Pomona Freeway Near Greenwood Avenue**
Mesa 500-kV Substation Project
473



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



KOP 7 – Visual simulation of the Proposed Project

Note: Visual simulation revised June 2016 with updated project data

Figure 4.1-5i
**KOP 7: Visual Simulation - Updated
View Northeast from North Vail Avenue Near Appian Way**
Mesa 500-kV Substation Project
474

Response to Comment Set D2: Jack Horne

D2-1 The buffer distance of 50 feet contained in the mitigation measure is correct. The 10-foot buffer distance mentioned in the text of the cultural resources section is incorrect and is a typographical error. The California Public Utilities Commission (CPUC) considers a buffer distance of 50 feet appropriate to protect the resource, given the nature of construction activities and vehicle movement. The following revisions were made to pages 4.4-25 and 4.4-26 to correct the typographical error.

Page 4.4-25:

Mitigation Measure (MM) CR-1 requires a qualified archeologist, approved by the CPUC, to erect flagging to create a ~~10~~50-foot buffer around the historic era debris and concrete enclosure. MM CR-1 also requires signs to be erected indicating that construction equipment, materials, and personnel shall stay out of the flagged area. Therefore, impacts resulting from installation of the telecommunications lines would be less than significant with mitigation.

Page 4.4-26:

MM CR-1 requires a qualified archeologist, approved by the CPUC, to erect flagging to create a ~~10~~50-foot buffer around the historic-era concrete footings and shack. MM CR-1 also requires signs to be erected indicating that construction equipment, materials, and personnel shall stay out of the flagged area. Therefore, impacts resulting from the use of Staging Yard 7 during construction under this criterion would be less than significant with mitigation.

Southern California Edison's (SCE's) recommendation regarding evaluation of the eligibility of the historical era debris (resource P-19-186889) and concrete footings and shack (SAY-S-1) is noted; however, the commenter provided no substantiation as to why the changes to the mitigation measure are needed. The changes to the mitigation measure proposed by SCE make the measure less stringent. The CPUC believes the mitigation is feasible and is necessary to reduce impacts to resources P-19-186889 and SAY-S-1 to less than significant; therefore, no changes to the mitigation measure were made.

D2-2 The revision to MM CR-3 has been made as requested so that SCE will be notified upon discovery of a previously unknown cultural resource. A revision has also been made to correct the noted typographical error.

Pages ES12–ES-13, Page 4.4-30, and Page 8-18:

MM CR-3: Previously Unidentified Cultural Resources. If a previously unknown cultural resource is discovered during project construction activities, work shall be halted within 100 feet of the resource, and protective barriers shall be installed along with signage identifying the area as an “environmentally sensitive area.” Entry into the area shall be limited to authorized personnel, and the CPUC-approved cultural resources specialist/~~archaeologist~~-qualified archaeologist, SCE,

and the CPUC shall be notified immediately.

D2-3 The commenter's suggested change to MM CR-3 to include SCE as a responsible party is noted and included in the record for consideration by the decision makers. The CPUC recognizes that SCE would implement mitigation measures; however, the CPUC, as the CEQA Lead Agency, maintains responsibility for ensuring all mitigation is effectively implemented. The CPUC-approved cultural resources specialist/qualified archaeologist has the necessary expertise and is therefore appropriately assigned the discretion to determine whether another method would provide superior mitigation to cultural resources impacts and to ensure adherence to the procedures in MM CR-3. MM CR-3 has not been revised in response to the suggestion to add SCE as an organization to be a responsible party for determining whether another method would provide superior mitigation to cultural resources impacts.

D2-4 The commenter's suggested change to include SCE as a responsible party is noted and included in the record for consideration by the decision makers. The CPUC recognizes that SCE would implement mitigation measures; however, the CPUC, as the CEQA Lead Agency, maintains responsibility for ensuring all mitigation is effectively implemented. The CPUC-approved cultural resources specialist/qualified archaeologist has the necessary expertise and is therefore appropriately assigned the discretion to determine if there is a potential for the resource to be a historical resource. A revision has been made to correct the noted typographical error. No changes have been made in response to the suggestion to add SCE as an organization to be a responsible party for determining if a resource is a historical resource.

Page ES-13, Page 4.4-30, and Page 8-18:

- **Determination if a resource is an historical resource.** The CPUC-approved cultural resources specialist/qualified archaeologist, in consultation with the CPUC, shall determine if there is a potential for the resource to be a historical resource. If there is no potential for the resource to qualify as a historical resource, work shall resume after CPUC concurrence. If there is a potential for the resource to be a historical resource, the qualified archaeologist shall prepare an Evaluation Plan.

D2-5 A revision has been made to correct the noted typographical error.

Page ES-13, Page 4.4-30, and Page 8-18:

- **Evaluation Plan.** The resource-specific Evaluation Plan shall detail the procedures to be used to determine if the discovery is an historical resource. The Evaluation Plan shall include sufficient discussion of background and context to allow the evaluation of the resource against the historical resource criteria. It shall include a description of procedures to be used in the gathering of information to allow the evaluation. These techniques may include (but are not limited to): excavation, written documentation, interviews, and/or photography. For archaeological resource testing, the Evaluation Plan shall describe the archaeological testing procedures, including, but not limited to: surface collection (if surface artifacts are discovered), test excavations

(including type, number, and location of test pits and/or trenches), analysis methods, and reporting procedure. The Evaluation Plan shall be submitted to CPUC for review. Once approved, the Evaluation Plan shall be implemented in the field. The report resulting from this work shall include evaluation of the discovery, based on the significance criteria set forth in the Evaluation Plan, indicating if it is an historical resource. If the discovery is not found to be an historical resource, and CPUC concurs with that determination, protective barriers may be removed, and work may proceed in the area of the discovery. If the discovery is determined to be an historical resource, SCE shall prepare a Data Recovery Plan.

D2-6 A revision has been made to correct the noted typographical error.

Page ES-13, Page 4.4-31, and Page 8-18:

- **Data Recovery Plan.** Data Recovery Plans for historical resources that cannot be fully avoided shall be prepared in accordance with CEQA Guidelines section 15126.4(b)(3)(C) and PRC section 21083.2, as applicable. The Data Recovery Plan shall outline how the recovery of data from the resource will mitigate impacts to that resource to below a level of significance. The Data Recovery Plan shall describe the level of effort, including numbers and kinds of excavation units to be dug, excavation procedures, laboratory methods, samples (e.g., pollen, sediment, as appropriate) to be collected and analyzed, analysis techniques that will yield information relevant to the aspects of the site that make it an historical resource, and reporting procedure. This plan shall be submitted to the CPUC for review and approval. Once approved, the applicant shall implement the approved plan. Once the data recovery field work is complete, a Data Recovery Field Memo shall be prepared.

D2-7 MM CR-4 is consistent with the cited text on page 4.4-28, whether or not the word “all” is used. The requirement of MM CR-4 is to monitor ground disturbing activities in areas of moderate to high potential to contain paleontological resources. No changes to the mitigation measure have been made in response to this comment.

D2-8 Areas of moderate to high paleontological sensitivity are identified in Table 4.4-7 of the Draft Environmental Impact Report (EIR). MM CR-4 has been revised to reflect that areas as designated by the Paleontological Resources Management Plan with moderate to high potential to contain paleontological resources are identified in Table 4.4-7.

Page ES-13, Page 4.4-31, and Page 8-19:

MM CR-4: Paleontological Resources Monitoring. Prior to the start of construction, the applicant shall retain a qualified paleontologist. The qualified paleontologist shall be approved by the CPUC and shall monitor all ground-disturbing activities that take place within areas that have a moderate to high potential to contain paleontological resources, consistent with designations shown in Table 4.4-7. The Paleontological Resources Management Plan (APM-CUL-01) shall show a map of areas requiring monitoring consistent with Table 4.4-7. The paleontological monitor shall have the authority to halt construction in the vicinity

of any potential paleontological resource finds to begin implementation of MM CR-7.

- D2-9 The following revision has been made to MM CR-5 to provide for consultation with the applicant regarding whether avoidance is feasible.

Page ES-13, Page 4.4-31, and Page 8-19:

MM CR-5: Follow Paleontological Resource Discovery Protocol. In the case that a previously unknown paleontological resource is discovered during construction activities, all work within 15 meters of the resource shall be stopped, and the CPUC-approved paleontologist shall determine, after consulting with SCE, whether the resource can be avoided. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.

- D2-10 The commenter's suggested change to include SCE as a responsible party in MM CR-5 is noted and included in the record for consideration by the decision makers. The CPUC-approved paleontologist has the necessary expertise and is therefore appropriately assigned the discretion to determine if there is another method that would provide superior mitigation of impacts to the resource. The paleontologist may consult SCE. No changes have been made in response to the suggestion to include SCE as a responsible party, as SCE as an entity does not have the expertise necessary to determine if there is another method that would provide superior mitigation. A revision has been made to correct the noted typographical error.

Page ES-14, Page 4.4-32 and Page 8-19:

If the resource is unique, then work shall remain stopped, and the approved paleontologist shall consult with the applicant and the CPUC regarding methods to ensure that no substantial adverse change would occur to the significance of the resource pursuant to CEQA. Preservation in place, i.e., avoidance, is the preferred method of mitigation for impacts to paleontological resources and shall be required to mitigate impacts to previously undiscovered resources unless the CPUC-approved ~~paleontologist cultural resources specialist/qualified archeologist~~ determines that another method would provide superior mitigation of impacts to the resource. Other methods include ensuring that the fossils are recovered, prepared, identified, catalogued, and analyzed according to current professional standards under the direction of a qualified paleontologist. Methods of recovery, testing, and evaluation shall adhere to current professional standards for recovery, preparation, identification, analysis, and curation, such as the 2010 Society of Vertebrate Paleontology *Standard Procedures for the Assessment of Adverse Impacts to Paleontological Resources*. Work can commence following recovery and CPUC approval.

- D2-11 SCE's comment is noted and the following edits have been made to the EIR.

Page ES-23:

MM PS-1: Relocation Agreement with ~~Municipal~~ Metropolitan Water District.

Prior to construction that would take the MWD's 72-inch Middle Feeder Pipeline out of service, the applicant shall reach an agreement with the MWD that will identify an alternate alignment that crosses the project site. This relocation agreement will enable the MWD to maintain reliable deliveries of treated water to its member agencies during relocation of the pipeline. SCE shall submit to the CPUC information from the MWD confirming that relocation of the pipeline will not result in inability to adequately serve customers. SCE shall submit this documentation at least 30 days prior to the pipeline being taken out of service.

Page ES-30 through ES-31:

Table ES-4 Areas of Potential Controversy

California Environmental Quality Act Resource Area	Potential Issue or Impacts
Aesthetics	<ul style="list-style-type: none"> • Visual impacts to residents' homes in Montebello. • The inclusion of aesthetically pleasing landscaping and architectural designs. • Visual impact from lack of maintenance of power lines and electrical infrastructure.
Air Quality and Greenhouse Gases	<ul style="list-style-type: none"> • Emissions of oxides of nitrogen [NO_x], particulate matter less than or equal to 10 microns in diameter [PM₁₀], and particulate matter less than or equal to 2.5 microns in diameter [PM_{2.5}] would exceed significance thresholds.
Biological Resources	<ul style="list-style-type: none"> • Impacts to coastal California gnatcatcher, a species categorized as threatened by the federal government.
Cultural Resources	<ul style="list-style-type: none"> • Native American monitoring during all ground disturbances.
Geology, Soils, and Minerals	<ul style="list-style-type: none"> • Preparation of a soil report for work associated with the relocation of a water pipeline located on the Mesa Substation site.
Hazards and Hazardous Materials	<ul style="list-style-type: none"> • Proximity to Operating Industries Incorporated Superfund site.
Hydrology and Water Quality	<ul style="list-style-type: none"> • Impacts to waterways that drain into the Rio Hondo River.
Land Use	<ul style="list-style-type: none"> • Potentially incompatible zoning designations in Monterey Park. • Exceedance of limitations included in the applicant's franchise agreement with Monterey Park.
Noise	<ul style="list-style-type: none"> • Noise impacts from the jack-and-bore pit locations on Potrero Grande Drive.
Public Services and Utilities	<ul style="list-style-type: none"> • Interruption of water supply to Municipal Metropolitan Water District customers during pipeline relocation. • Water supply from the City of Monterey Park during construction.
Traffic	<ul style="list-style-type: none"> • Preservation of the State Route 60 right-of-way for future expansion • Overlap with the Metro Eastside Transit Corridor Phase 2 Project.
Alternatives	<ul style="list-style-type: none"> • Analysis of the No Project Alternative.

D2-12 The following edits have been made to the EIR based on updated project information provided by SCE.

Page 1-1:

SCE’s proposed project as described in the ~~is described in the~~ Proponent’s Environmental Assessment (PEA) and responses to data requests is as follows:

- Construction of the new 500/220/66/16-kV Mesa Substation and demolition of the existing 220/66/16-kV substation, increasing the substation’s footprint from about 22 acres to ~~69~~72 acres.
- Replacement (removal and installation) and modification of transmission lines, subtransmission lines, and distribution structures to accommodate the new 500/220/66/16-kV Mesa Substation.
- Installation of a temporary 220-kV transmission structure to connect the Eagle Rock-Mesa-kV Transmission Line to Goodrich Substation and maintain a second line of service to the City of Pasadena.
- Replacement of an existing 220-kV double-circuit transmission structure supporting the existing Goodrich-Laguna Bell (future Laguna Bell-Mesa No.1) and Mesa-Redondo 220-kV Transmission lines in order to increase the capacity rating of the future Laguna Bell-Mesa No. 1 220-kV Transmission Line.
- New telecommunications lines and modifications to an existing line, mostly on existing poles and in existing ducts.
- Temporary modifications to 220-kV equipment at several existing substations to prevent electrical outages during construction.
- Relocation of an existing 72-inch water pipe that traverses the substation site.

D2-13 The following edit has been made to Table 2-1 in the EIR based on updated project information provided by SCE.

Page 2-9:

New overhead structures	24 <u>23</u> new TSPs	<ul style="list-style-type: none"> • Double-circuit structures: 50 to 130<u>100</u> feet high, 3 to 5 feet in diameter. Concrete foundations: 5 to 7 feet diameter, 20 to 40 feet depth. • Conductor: 954 kcmil stranded aluminum conductor⁽²⁾.
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D2-14 The following edit has been made to Table 2-1 in the EIR based on information provided by SCE.

Page 2-9:

Structure removal	76 <u>65</u> poles and underground line	<ul style="list-style-type: none"> • Removal of 76<u>65</u> existing 66-kV subtransmission structures<u>poles</u> and 2,000 feet of underground conductor.
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D2-15 The following edit has been made to Table 2-1 in the EIR based on updated project information provided by SCE.

Page 2-9:

New overhead structures	2423 new TSPs	<ul style="list-style-type: none"> • Double-circuit structures: 50 to 130100 feet high, 3 to 5 feet in diameter. Concrete foundations: 5 to 7 feet diameter, 20 to 40 feet depth. • Conductor: 954 kcmil stranded aluminum conductor ⁽²⁾.
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D2-16 The following edit has been made to Table 2-1 in the EIR based on updated project information provided by SCE.

Page 2-9:

New underground structures and conduits	4.234 miles of trench and 2728 new vaults	<ul style="list-style-type: none"> • 1713 vaults within Mesa Substation site and 1015 vaults outside the substation perimeter.
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D2-17 The following edit has been made to Table 2-1 in the EIR based on updated project information provided by SCE.

Page 2-9:

New underground structures and conduits	4.234 miles of trench and 2728 new vaults	<ul style="list-style-type: none"> • 1713 vaults within Mesa Substation site and 1015 vaults outside the substation perimeter.
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D2-18 The following edit has been made to Table 2-1 in the EIR based on information provided by SCE.

Page 2-9:

<i>North Area: City of Pasadena</i>		
220-kV transmission lines	One temporary structure TSP	<ul style="list-style-type: none"> • Install temporary structureTSP (110 to 140 feet tall) to connect the Eagle Rock-Mesa 220-kV transmission line to Goodrich Substation. • Work area required: 200 feet by 200 feet. • Structure would maintain a second line of service to the City of Pasadena when the Goodrich-Laguna Bell 220-kV transmission line is temporarily out of service during its reconnection to the new proposed Mesa Substation.

D2-19 The following edit has been made to Table 2-1 in the EIR based on updated project information provided by SCE.

Page 2-10:

Main Project Area		
Structure relocations within Mesa Substation site	One existing and two new lines	<ul style="list-style-type: none"> • Reroute one existing telecommunications line to clear the Mesa Substation construction area. • Relocate existing overhead and underground telecom lines using <u>eight</u> existing vaults and <u>six</u> manholes. • Install two new lines to increase circuit diversity.

D2-20 The following edit has been made to Table 2-1 in the EIR based on updated project information provided by SCE.

Page 2-11:

Duct banks and vaults along Telecommunications Routes	18 existing vaults and <u>85</u> new vaults; 1.8 miles of new duct bank	<ul style="list-style-type: none"> • Installation of existing and new underground duct banks. • Duct banks: two 5-inch conduits per bank, spacers and concrete. • Vaults: 5 feet wide by 5 feet long and 6 feet deep.
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D2-21 Figure 2-4 Proposed Mesa Substation Layout has been updated with the new layout provided by SCE. Refer to page 2-29 for the revised figure.

D2-22 Access to the proposed substation for operations and maintenance from a new paved driveway at Greenwood Avenue has been added to the project description as requested by SCE.

Page 2-34:

Substation Access, Perimeter Wall, and Parking Area

Access to the proposed Mesa Substation would be provided by new asphalt and/or concrete access driveways from Potrero Grande Drive and East Markland Drive. The main entrance at Potrero Grande Drive would be 50 feet wide, while the secondary entrance from East Markland Drive would be approximately 30 feet wide. Both entrances would have access gates. The applicant would also construct a sidewalk outside the proposed Mesa Substation site along Potrero Grande Drive and provide landscaping around the entire substation perimeter. A 26-foot wide paved driveway at Greenwood Avenue would be provided for operation and maintenance purposes of the new test and operations building.

Changes were also made to the Section 4.14, "Traffic and Transportation," to reflect this updated information.

Page 4.14-30:

Operation and Maintenance

A 26-foot wide paved driveway at Greenwood Avenue would be provided for operation and maintenance purposes of the new test and operations building; however, tThe proposed project would not result in operational impacts because the proposed project would require approximately the same number of employees during operations as ongoing operations of the existing infrastructure. Maintenance activities for the transmission, subtransmission, and distribution lines would occur on an as needed basis and maintenance of access roads would occur on an annual or as needed basis. Maintenance activities would not require more trips than what operation and maintenance currently requires. There would be no change compared to current operation and maintenance and there would be no impact.

D2-23 The following changes have been made to the 66-kV subtransmission line features based on updated information provided by SCE.

Page 2-40:

- Installation of ~~2324~~ overhead 66-kV structures, ~~10,300 linear~~17,000 feet of underground duct ~~bank~~, and ~~1045~~ vault structures within adjacent transmission ROW and franchise areas, and modification of existing access roads, as necessary; and

D2-24 Changes to the features of the 66-kV subtransmission line have been made based on updated information provided by SCE. Response to comment D2-23 shows these line item edits to the EIR.

D2-25 The following change has been made to the description of the overhead subtransmission structures based on updated project information provided by SCE.

Page 2-41:

The proposed 66-kV overhead subtransmission components would use 24 TSP structures. The TSPs would be steel structures with a dulled finish and approximately 3 to 5 feet in diameter at the base, extending approximately 50 to ~~13000~~ feet above-ground. These structures would be attached to concrete foundations that would be 5 to 7 feet in diameter, extending underground approximately 20 to 40 feet, and having up to 4 feet of concrete visible above ground.

D2-26 The following change has been made to the number of underground structures included in Table 2-4 of the EIR based on updated project information provided by SCE.

Page 2-41:

Table 2-4 Underground Structure Dimensions

Type of Structure	Approximate Number of Structures	Approximate Structure Dimensions (feet) ^{(1), (2)}		
		Width	Length	Depth
Subtransmission Vault	15	10	20	8
Subtransmission Duct Bank	10	2	18,000	5
Telecommunications Vault	85	5	5	6
Telecommunications Duct Bank	6	2	1,600	3
Distribution Vault	4	7	18	8
Distribution Duct Bank	4	2	900	5

D2-27 The following change has been made to the description of site access for 220-kV structure replacement in the City of Commerce in the EIR based on updated information provided by SCE.

Page 2-47:

For the proposed replacement of the existing lattice steel tower (LST) on the Goodrich-Laguna Bell 220-kV transmission line, the applicant would use ~~Flotilla Street (at its intersection with Garfield Avenue)~~ Corvette Street as an access roadway.

D2-28 The following minor clarification has been made based on a suggestion provided by SCE.

Page 2-52:

Prior to construction of the proposed Mesa Substation, the applicant would conduct site preparation activities such as vegetation clearing, grading, installing a temporary chain-link fence around the substation perimeter, and constructing a new driveway to provide access to the construction equipment and vehicles. Prior to ~~construction commencement~~ of the proposed substation, the applicant would also develop a landscaping plan, consulting with the City of Monterey Park Department of Community and Economic Development (Building Division) and the Metropolitan Water District.

D2-29 The following changes have been made based on information provided by SCE.

Page 2-52:

Prior to construction of the proposed Mesa Substation, the applicant would conduct site preparation activities such as vegetation clearing, grading, installing a

temporary chain-link fence around the substation perimeter, and constructing a new driveway to provide access to the construction equipment and vehicles. Prior to ~~construction commencement~~ of the proposed substation, the applicant would also develop a landscaping plan, consulting with the City of Monterey Park Department of Community and Economic Development (Building Division) and the Metropolitan Water District.

D2-30 The following changes have been made to the description of access driveways for the proposed substation in the EIR based on updated project information provided by SCE.

Page 2-54:

It would be about 25 feet wide. Once Temporal Phase 3 begins, the applicant would establish the primary substation access driveway from Potrero Grande Drive approximately 700 feet west of closer to Greenwood Avenue. This driveway would be about ~~50~~150 feet wide. Also, a new 26-foot wide paved driveway will be provided on Greenwood Avenue approximately 525 feet south of Potrero Grande Drive for operation and maintenance purposes of the new test and operations buildings. During substation operations, each permanent access driveway (Potrero Grande Drive, Greenwood Avenue, and East Markland Drive) would have a rolling gate installed to control access to the Mesa 500-kV Substation site.

D2-31 The following change has been made to the description of Phase 1 construction activities in the EIR based on updated project information provided by SCE.

Page 2-62:

- Assembly and erection of various transmission and subtransmission structures, including:
 - Eight 220-kV LSTs,
 - Ten 66-kV TSPs and six 66-kV vaults,
 - Four 66-kV duct banks and four vaults,
 - Five 16-kV duct banks, and four vaults, and
 - ~~Eight~~Five telecommunication manholes and six duct banks,
- Construction of the Operations Building.

D2-32 The following change has been made to the description of retaining walls needed during Phase 1 based on updated information provided by SCE.

Page 2-62:

~~Two temporary retaining walls would be constructed during initial site grading in the southwest portion of the Mesa Substation site, near the existing 220-kV LSTs. These walls would create sufficient space to assemble and erect the replacement towers. When the new towers are constructed, the retaining walls would be removed and grading around those areas would be completed.~~

~~In addition, the~~ The applicant would construct two permanent retaining walls within the Mesa Substation site. One wall would be located on the north side of the substation along Potrero Grande Drive and would be approximately 1,500 feet long and approximately 18 feet tall. The second wall would be located on the northeast side of the substation along Greenwood Avenue, approximately 250 feet long with a maximum height of 16 feet. In both cases, the substation perimeter wall would be mounted to the top of the retaining wall. In these cases, the exterior view of the substation, looking from either Potrero Grande Drive or Greenwood Avenue, would only consist of the substation perimeter wall.

D2-33 The following clarification has been made regarding construction activities based on SCE's comment.

Page 2-67:

Following ~~installation of permanent facilities~~ construction activities at each site, the applicant would remove all temporary structures and components. The holes resulting from pole removal would be backfilled using excavated soil from other construction areas.

D2-34 The following changes have been made to description of structures based on information provided by SCE.

Page 2-70:

Transition Structures

~~The applicant would install transition structures following a sequence similar to that described for TSP and wood pole installation.~~

Wood Pole Installation

Each wood pole would require a hole to be excavated using either an auger, backhoe, or with hand tools. The wood poles would be placed in temporary laydown areas at each pole location. While on the ground, the wood poles may be configured (if not preconfigured) with the necessary cross arms, insulators, and wire stringing hardware before being set in place. The wood poles would then be installed in the holes, typically by a line truck with an attached boom. Wood guy stub poles and wood guard structure poles would be installed similarly to wood poles.

Light-Weight Steel Pole Installation

LWS poles would be installed similarly to wood poles.

D2-35 Information regarding wood pole and light-weight steel pole installation was added to the EIR based on information provided by SCE. Refer to response to comment D2-34 above for in-text changes.

D2-36 The following clarification has been added to the EIR based on SCE's comment.

Page 2-72:

Trenching activities would be temporary and staged to ensure that open trench segments would not exceed the area required for duct bank installation. While constructing in public access areas, the applicant would install steel plates over open trenches during inactivity to maintain vehicle and pedestrian traffic. Prior to construction activities, the applicant would also make provisions for emergency vehicle access in coordination with local agencies.

D2-37 The following change has been made to the description of underground construction based on updated project information provided by SCE.

Page 2-71:

The proposed project would include a total of approximately 4.234 miles of new underground subtransmission lines and also would use existing underground features. For underground construction associated with the proposed project, the applicant would conduct the following activities.

D2-38 The following addition to the EIR has been made based on SCE's comment.

Page 2-74:

The applicant anticipates that horizontal boring operations for the proposed project would excavate between 590 to 1,180 CY of material. Following the duct bank installation, the crew would backfill the bore pits with native materials and cover the duct bank with at least 36 inches of engineered or native fill, as appropriate. Any excess soil material would be utilized onsite or hauled off site and disposed of at an approved disposal facility.

D2-39 The following addition to the description of Clean Water Act (CWA) requirements in the EIR has been made based on SCE's comment.

Page 2-81:

Construction of the proposed project would disturb a surface area greater than 1 acre. Therefore, the applicant would be required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and 2012-0006-DWQ from the State Water Resources Control Board. Commonly used BMPs are storm water runoff quality control measures (boundary protection), dewatering procedures, and concrete waste management. The SWPPP would be based on final engineering design and would include all proposed project construction components.

D2-40 SCE states that coordination of its operations and maintenance (O&M) activities with Metropolitan Water District's O&M activities related to the relocated Middle Feeder

pipe is needed and suggests including Metropolitan Water District’s O&M activities in this section. The following change to the EIR has been made:

Page 2-83:

Additional O & M activities at the proposed Mesa Substation would include maintenance of non-electrical facilities, including restrooms, air conditioning, and general facilities housekeeping, and MWD’s relocated Middle Feeder.

D2-41 The following correction to the hyperlink to the CPUC’s webpage regarding electric and magnetic fields (EMFs) was made based on SCE’s comment. The link SCE provided was not valid; the text was revised to include the valid link.

Page 2-85:

For further information about EMFs and CPUC guidelines, refer to:
<http://www.cpuc.ca.gov/general.aspx?id=4879>
[http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Fields.](http://www.cpuc.ca.gov/PUC/energy/Environment/ElectroMagnetic+Fields)

D2-42 CPUC policy does not restrict the consideration of EMF reduction measures to those measures known or deemed feasible during initial project design; therefore, SCE’s recommended edit was not made as suggested. Instead, the following clarification was made regarding the implementation of low cost/no-cost EMF reduction measures based on CPUC policy.

Page 2-85:

SCE would incorporate the following low-cost/no-cost measures into the design of the proposed project if feasible.

D2-43 The following addition to the description of CWA requirements in the EIR has been made based on SCE’s comment.

Page 2-89:

California State Water Resources Control Board	Storm water discharges and Clean Water Act Section 401 permit	Notice of Intent to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order 2009-0009-DWQ as amended by Orders 2010-0014-DWQ and <u>2012-0006-DWQ</u> and Section 401 Permit associated with issuance of a Clean Water Act Section 404 Permit.
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D2-44 The following correction in Chapter 2, “Project Description,” has been made based on SCE’s comment.

Page 2-89:

Los Angeles Regional Water Quality Control Board	National Pollutant Discharge Elimination System permitting	As directed by State Water Resources Control Board, monitor development and implementation of Storm Water Pollution Prevention Plans (SWPPPs) and other aspects of the National Pollutant Discharge Elimination System permit and 401 certification program. SWPPPs are required for storm water discharges associated with construction activities that disturb more than 1 acre <u>or more</u> of land.
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D2-45 The first suggested sentence from the commenter would be a better addition to the impacts section where visual simulations are discussed rather than in the introduction to this section. The first sentence suggested by the commenter has been added to the introduction to Section 4.1.3 for Environmental Impacts to provide additional clarity.

Page 4.1-18:

Environmental impacts for construction and operation of the proposed project are described below. Visual simulations have been prepared for the KOPs analyzed to better understand the aesthetic impacts from the proposed project; however, all visual simulations included in this section are conceptual only.

The second sentence recommended by the commenter has been added to discussions of key observations points (KOPs) 1 and 3 in the impacts section where the options for landscape treatment along Potrero Grande Drive are discussed. However, it should be noted that SCE’s statement that it will meet with the City and discuss final landscaping and perimeter wall materials is not necessarily a condition of approval designed to address the City’s interests. MM AES-3 was developed to ensure the City’s interest in reducing aesthetic impacts from the proposed project are addressed for the appearance of the landscaping and wall proposed for Potrero Grande Drive.

The following revisions were made to Section 4.1.3.3 under KOP 1.

Page 4.1-30:

Figure 4.1-5c shows a visual simulation of the proposed project from KOP 1 with the implementation of Landscape Option 1. Figure 4.1-5d shows a visual simulation of the proposed project from KOP 1 with the implementation of Landscape Option 2 along Potrero Grande Drive. SCE has stated it will meet with the City of Monterey Park to discuss final landscaping and perimeter wall materials (including the spacing of pilasters).

The following revisions were made to Section 4.1.3.3 under KOP 3.

Page 4.1-36:

Figure 4.1-5e shows a visual simulation of the proposed project from KOP 3 with implementation of Landscape Option 1. Figure 4.1-5f shows a visual simulation of the proposed project from KOP 3 with implementation of Landscape Option 2 along the substation perimeter wall facing Potrero Grande Drive. SCE has stated it will meet with the City of Monterey Park to discuss final landscaping and perimeter wall materials (including the spacing of pilasters).

D2-46 The text has been revised per the comment to clarify that the central component of the proposed project is the construction of a new, larger substation to replace the existing Mesa Substation on the same site.

The following revisions have been made to Section 4.1.1.1.

Page 4.1-1:

The central component of the proposed project is the construction of a new, larger substation to replace the existing Mesa Substation on the same site. Some additional work would also occur near the existing substation. ~~work that would occur at or adjacent to the proposed Mesa Substation site.~~ The proposed project is located in an area of transition between the high, rugged San Gabriel Mountains approximately 10 to 15 miles to the north and the broad, gently sloping coastal plain to the south. The terrain within this transition area consists of rolling to steep hills intermixed with some flatter areas and various drainages. The San Gabriel Mountains provide a vivid backdrop to many views in the area. Although some remnants of native oak woodland, riparian, coastal sage scrub, and grassland habitats still exist, much of the area's vegetation now consists of non-native, ornamental plantings. The area is highly developed with housing, commercial and industrial, freeways, and other land uses, including some parks and open space areas.

The second part of this comment refers to the character of the broad area around the site rather than the site itself. Therefore, it is not appropriate to add the suggested language without also discussing the variety of other land uses in the area (landfill, schools, etc.). It is sufficient and accurate to say this area is highly developed. The site and its surroundings are discussed in more detail in the following paragraph and later when discussing specific views in the area. No changes to the text have been made.

D2-47 SCE requests that the "impact conclusion" be changed for travelers on Potrero Grande Drive. However, the CPUC believes SCE actually seeks changes to the "viewer sensitivity" rating and not the impact conclusion itself. Regardless, the City of Monterey Park General Plan (City of Monterey Park 2001) identifies Potrero Grande Drive as a key arterial road that should be given high priority "for upgrading the City's image." Furthermore, as stated in the Aesthetics section, this street is experienced on a regular basis by local area residents traveling for personal reasons, as well as people commuting to and from work at the business park and other locations. Given that this

street is recognized as important to the City’s image, a large portion of viewers are residents of the surrounding neighborhoods, and views are regularly experienced by pedestrians and others traveling at slower speeds than viewers on the Pomona Freeway, travelers on Potrero Grande Drive would have higher awareness of and concern for views than travelers on the Pomona Freeway. Therefore, viewer expectations for both roadways are not similar and visual sensitivity for travelers on Potrero Grande Drive remains moderate. No changes to the text have been made.

D2-48 SCE requests that the “impact conclusion” and “viewer sensitivity” rating be changed for the commercial area west of the substation site. However, although the City of Monterey Park identifies Potrero Grande Drive as a key arterial road that should be given high priority “for upgrading the City’s image,” viewer groups using the motel located along the south side of Potrero Grande and adjacent to the project site typically would not consist of local area residents. Based on local area residents’ familiarity with the surrounding environment, they have greater awareness and concern for a particular view in their local area than visitors would have. Although a large proportion of users of the gas station may consist of local area residents, the higher awareness of and concerns for views by this viewer group are captured in the viewer group of travelers on Potrero Grande Drive. For these reasons, the viewer sensitivity for the viewer group for the commercial area has been changed to moderately low. However, it should be recognized that this change to the level of viewer sensitivity for views from the commercial area does not change the viewer sensitivity or affect the visual sensitivity or conclusions of significance for views from Potrero Grande Drive.

The following revisions have been made to Table 4.1-1.

Pages 4.1-2 through 4.1-3:

Table 4.1-1 Sensitive Viewer Groups in the Vicinity of the Proposed Project Components

Viewer Group	Viewer Exposure				Viewer Sensitivity
	Approximate Location Relative to Project Components	Usage Volume	Duration of Views	Frequency of Views	
Residential neighborhoods north, west, and south of substation site (represented in KOPs 4 and 7)	Within 0.1 mile west and south and within 0.2 mile north of the proposed Mesa Substation site.	Moderate	Moderate to High	High	Moderately High to High
Visitors to cemetery	Within 0.3 mile east-northeast of the proposed Mesa Substation site.	Low	High	Low	Moderately High
Workers and visitors at business park north of substation site	Within 0.1 mile north of the proposed Mesa Substation site.	High	High	High	Moderately Low

Table 4.1-1 Sensitive Viewer Groups in the Vicinity of the Proposed Project Components

Viewer Group	Viewer Exposure				Viewer Sensitivity
	Approximate Location Relative to Project Components	Usage Volume	Duration of Views	Frequency of Views	
Travelers on Pomona Freeway (<u>represented in KOPs 5 and 6</u>)	Adjacent to and south of the Mesa Substation site.	High	Low	Moderate to High	Low to Moderately Low
Travelers on Potrero Grande Drive (<u>represented in KOPs 1, 2, and 3</u>)	Adjacent to and north of the Mesa Substation site.	Moderately High	Low	Moderately High	Moderate
Commercial area (gas station and motel) west of substation site	Adjacent to and west and north of the Mesa Substation site.	Moderate	Moderate	Moderate	Moderately <u>Low</u>

D2-49 The following revisions to Section 4.1.3.3 have been made.

Page 4.1-22:

Transmission, subtransmission, and distribution work adjacent to the substation would require work in various locations for short durations as ~~poles~~ structures are installed or removed, and conductor is installed.

D2-50 The following revisions to Section 4.1.3.3 have been made.

Page 4.1-22:

Figures 4.1-4a and 4.1-4b show existing views from areas within the vicinity of Goodrich Substation in the City of Pasadena. The temporary ~~tubular steel pole (TSO) structure~~ and loop-in would be installed as part of the proposed project and that would be present during the construction phase would be visible from I-210 as well as nearby residences and a community college. However, other existing tall metal lattice transmission towers, a cell phone tower, and other tall metal structures associated with Goodrich Substation would be visible alongside the temporary infrastructure. The additional contrast would be minimal and vividness, intactness, and unity of views from these areas would not be substantially reduced.

Page 4.1-21:

Given that there would be an overall net reduction or maintenance of the total number of structures at KOPs 2 and 4 (and approximately one less 500-kV structure, eight fewer 220-kV structures, and 41 fewer subtransmission ~~poles~~ structures overall), the result would be either maintenance or slight improvement of the existing visual quality of the area. In addition to the contrast produced by

their form, line, and texture, transmission lines could also produce strong contrast due to the reflectivity of conductors or color or finish of structures, especially if they have a shiny, metallic, galvanized finish.

D2-51 The following revisions to Section 4.1.3.3 have been made.

Pages 4.1-23 through 4.1-24:

Installation of marker balls may be recommended by the FAA on structures over 200 feet above ground per FAA Advisory Circular 70/7460-1L (FAA 2015). The location and other details of marker balls would be recommended by the FAA after SCE submits an FAA Form 7460-1 once engineering has been completed to the point where actual heights of structures are known. The three proposed 500-kV structures would range from approximately 140 to 200 feet aboveground. Conductors would be placed 12 to 14 feet below the top of the LST (see Figure 2-5). The ground surface is about level in the area of the two conductor spans. Notably, the recently constructed TRTP 500-kV transmission line does not have marker balls. Together, this indicates that no conductor would be located over 200 feet from the ground and that no marker balls are likely to be ~~required~~ recommended by the FAA. If, however, during final engineering, the conductor is placed more than 200 feet above the ground, then marker balls may be ~~required~~ recommended along these two spans, which together measure about 1,200 linear feet.

D2-52 Viewer sensitivity is correctly identified as moderate for viewer groups on Potrero Grande Drive. (See response to comment D2-47.)

The CPUC recognizes that Data Request Set A.15-03-003 ED-SCE-01 Follow Up 3 indicates that the wall height will be 12 feet and not 10 feet. SCE provided an updated visual simulation with its comment. However, this does not change the CPUC's conclusion regarding aesthetic impacts.

The rationale provided by the commenter fails to include the discussion following the quoted text describing existing conditions for views from KOP 1, which states: "The other tall metal structures associated with the substation visible in the distant foreground and middleground are mostly screened by the tall trees and therefore are less noticeable."

The commenter incorrectly bases its rationale on the view having low scenic quality and moderately low viewer sensitivity, whereas the conclusions of significance in the analysis are based on the increase in the amount of contrast and reductions in unity, intactness, and vividness produced by the proposed project for views with moderate visual sensitivity. Furthermore, the analysis of aesthetic impacts in the EIR is more robust, providing a detailed rationale for each of the two landscape options proposed by SCE. The analysis for Landscape Option 1 states: "With implementation of MM AES-2 and MM AES-3, impacts under this criterion would remain significant and unavoidable for several years for views from KOP 1 before trees grow to maturity. As the trees in the landscaping mature, they would screen more of the substation and soften the contrast, and impacts would then be less than significant." The analysis for Landscape Option 2 states: "the landscaping allowed under this option still excludes

trees and other larger plants that would serve a visual screening function and that would be taller than the walls to reduce contrast. Thus, impacts under this criterion would be somewhat reduced by implementing MM AES-2 and MM AES-3 but would remain significant at KOP 1 for this option, even after implementation of mitigation.” Thus, in the absence of a selected option, the conclusion of “significant with mitigation” identified immediately below the “Mesa Substation” header reflects the level of impact represented by implementation of Landscape Option 2.

For the reasons described above, the commenter’s suggested change has not been made.

D2-53 The following revisions to Section 4.1.3.3 have been made.

Page 4.1-29:

Work within the North and South Areas includes the replacement of a single LST with a similar LST in the City of Commerce, installation of a temporary pole and 220-kV tie-in at Goodrich Substation in Pasadena that would be removed once the temporary tie-in is no longer needed following construction, and the conversion of an existing streetlight source line. The new LST in Commerce would not be noticeably different from the existing LST; therefore, impacts would be less than significant. The new telecommunications components at Goodrich Substation would be underground in an already disturbed area and therefore would not be noticeable during operation. No visual impact would result from operation and maintenance at Goodrich Substation due to the 220-kV tie-in because operation and maintenance would be the same as under existing conditions. Conversion of the overhead street light source line to underground would remove from view an existing overhead line that contrasts somewhat with its surroundings. Although minor, removal of this element would result in a beneficial aesthetic impact; therefore, there would be no impact associated with this component.

D2-54 The EIR includes the visual simulations provided by SCE in the Proponent’s Environmental Assessment (and as updated by the applicant in their Draft EIR comment letter) and the CPUC used the same assumptions as SCE in its analysis in the Draft EIR. Thus, the following revisions to Section 4.1.3.3 have been made.

Page 4.1-30:

The simulation in Figure 4.1-5c shows a new masonry screening wall and new street trees lining the sidewalk along the edge of the site and Potrero Grande Drive. Although the new, taller LSTs, TSP, and other metal structures would remain dominant in this view, the row of street trees extending above the new masonry wall would help partially screen views of the lower portions of elements in the substation and would partially screen the wall. The trees are shown at approximately 15 to 20 years old, which may be approximately 5 to 10 years after planting, depending on their species and size and age at planting. The trees would also somewhat reduce the contrast produced by the new, tall metal structures and wall by softening the angular patterns of the wall and metal structures. However, for several years following planting, until the street trees are large enough to

~~substantially screen views of the lower portions of elements in the substation and the wall, Contrast would remain moderately strong and intactness and unity for views from Potrero Grande Drive would be substantially reduced for views from Potrero Grande Drive with moderate visual sensitivity. During this extended period, until the trees eventually mature, Landscape Option 1 would therefore result in a significant impact. During this extended period of time unless the street trees are similar in size to the existing vegetation within a few years after construction. Contrast would be moderately strong, the sole TSP would be dominant as a strong vertical feature, and the new landscaping would not soften vertical lines as much as the existing vegetation. Visual sensitivity is moderate. The existing vividness, intactness, and unity would therefore be substantially reduced. Landscape Option 1 would therefore result in a significant impact.~~

D2-55 For the reasons described above in response to comment D2-52, the commenter's suggested change has not been made.

D2-56 The following revisions to Section 4.1.3.3 have been made.

Page 4.1-30:

MM AES-2-3 would require that the applicant provide landscape screening and aesthetic treatment along Potrero Grande Drive to reduce aesthetic impacts of the proposed project. MM AES-3 requires design approval of the final Landscape and Aesthetic Treatment Plan by ~~CPUC~~ the City prior to construction.

D2-57 Viewer sensitivity is correctly identified as moderate for viewer groups on Potrero Grande Drive. (See response to comment D2-47.)

Aesthetic impacts are based on an analysis of existing conditions and the changes to views with the addition of new structures and removal of existing screening vegetation proposed with the project. The analysis for KOP 3 states: "All of the existing mature trees and other vegetation on and immediately adjacent to the substation site and visible in the existing view would be removed. Vegetation to be removed includes a number of tall trees that currently screen the lower portions of transmission structures and most of the other metal structures at the substation; the vegetation also softens the otherwise geometric patterns at the current substation site."

Based on the revised visual simulations submitted by SCE with its comments on the Draft EIR, the analysis for KOP 3 Landscape Option 1 has been revised to less than significant with mitigation.

The following revisions have been made to Section 4.1.3.3.

Page 4.1-36:

Landscape Option 1

The simulation in Figure 4.1-5e shows a new masonry screening wall, new street trees lining the sidewalk along the edge of the site and Potrero Grande Drive, and new metal operations and test and maintenance buildings. The trees are shown at

approximately 15 to 20 years old, which may be approximately 5 to 10 years after planting, depending on their species, and size, and age at planting. With installation of the new street trees and screening wall under Landscape Option 1, vividness would be only slightly reduced in the long term from the existing condition. In the short term, vividness would be substantially reduced before the trees reached mature height. The trees would also somewhat reduce the contrast produced by the new, tall metal structures and wall by softening the angular patterns of the wall and metal structures. The new masonry screening wall and row of street trees would help screen views of the lower portions of elements in the substation, thereby reducing overall contrast to moderate and resulting in only a slight reduction in intactness and unity. However, for several years following planting, until the street trees are large enough to substantially screen views of the lower portions of elements in the substation, the metal buildings, and the wall, contrast would remain moderately strong and intactness and unity would be substantially reduced for views from Potrero Grande Drive with moderate visual sensitivity. During this extended period, until the trees eventually mature, Landscape Option 1 would therefore result in a significant impact and slightly reduce the contrast. ; however, the trees would not substantially screen views of the new metal buildings or central TSP in the view, intactness and unity would be substantially reduced, and contrast would be moderately strong. Because the existing vividness, intactness, and unity would be reduced, contrast is moderately strong, and visual sensitivity is moderately high, the proposed project would substantially degrade the existing visual character and quality of the site and its surroundings. Therefore, aesthetic impacts for KOP 3 would be significant under Landscape Option 1.

To reduce aesthetic impacts of the proposed project for KOP 3 under Landscape Option 1 and ensure the site's visual character and quality are maintained at a level similar to the existing condition, MM AES-3 would require that the applicant provide aesthetic treatment for the operations and test and maintenance buildings and also provide landscape and aesthetic treatment along Potrero Grande Drive. MM AES-3 requires design approval of a final Landscape and Aesthetic Treatment Plan by CPUC prior to construction. Ultimately, the majority of the visible infrastructure is present against most of the visible sky and cannot be effectively screened or modified to reduce its visual dominance. With implementation of MM AES-3 and MM AES-4, impacts under this criterion would be somewhat reduced, but would remain significant at KOP 3. MM AES-3 would require that the applicant provide landscape screening and aesthetic treatment along Potrero Grande Drive to reduce aesthetic impacts of the proposed project. MM AES-3 requires design approval of the final Landscape and Aesthetic Treatment Plan by the City prior to construction. With implementation of MM AES-2 and MM AES-3, impacts under this criterion would remain significant and unavoidable for several years for views from KOP 3 before trees grow to maturity. As the trees in the landscaping mature, they would screen more of the substation and buildings and soften the contrast, and impacts would then be less than significant.

D2-58 The text has been revised to address some of the commenter's suggested changes. As explained in response D2-57, based on the project revisions submitted by SCE, the analysis for KOP 3 Landscape Option 1 has been revised to less than significant with mitigation.

The following revisions have been made to Section 4.1.3.3.

Page 4.1-36:

Although the new LSTs would be similar in appearance to the existing LSTs, they would be taller and closer to viewers traveling along Potrero Grande Drive. As a result, they would be more dominant than the existing LSTs. The new TSPs, tall metal switchracks, and ~~new metal operations and test and maintenance buildings~~ would add new geometric forms and lines to the view. These changes, in combination with removal of the existing tall trees and other vegetation on and around the site, would produce strong contrast and reduce the intactness and unity of views from Potrero Grande Drive.

Additionally, the following revisions have been made to Section 4.1.3.3.

Page 4.1-36:

The new masonry screening wall and row of street trees would help screen views of the lower portions of elements in the substation, thereby reducing overall contrast to moderate and resulting in only a slight reduction in intactness and unity. However, for several years following planting, until the street trees are large enough to substantially screen views of the lower portions of elements in the substation, the metal buildings, and the wall, contrast would remain moderately strong and intactness and unity would be substantially reduced for views from Potrero Grande Drive with moderate visual sensitivity. During this extended period, until the trees eventually mature, Landscape Option 1 would therefore result in a significant impact and slightly reduce the contrast; ~~however, the trees would not substantially screen views of the new metal buildings or central TSP in the view, intactness and unity would be substantially reduced, and contrast would be moderately strong. Because the existing vividness, intactness, and unity would be reduced, contrast is moderately strong, and visual sensitivity is moderately high, the proposed project would substantially degrade the existing visual character and quality of the site and its surroundings. Therefore, aesthetic impacts for KOP 3 would be significant under Landscape Option 1.~~

~~To reduce aesthetic impacts of the proposed project for KOP 3 under Landscape Option 1 and ensure the site's visual character and quality are maintained at a level similar to the existing condition, MM AES-3 would require that the applicant provide aesthetic treatment for the operations and test and maintenance buildings and also provide landscape and aesthetic treatment along Potrero Grande Drive. MM AES-3 requires design approval of a final Landscape and Aesthetic Treatment Plan by CPUC prior to construction. Ultimately, the majority of the visible infrastructure is present against most of the visible sky and cannot be effectively screened or modified to reduce its visual dominance. With implementation of MM AES-3 and MM AES-4, impacts under this criterion would be somewhat reduced, but would remain significant at KOP 3.~~ MM AES-3 would require that the applicant provide landscape screening and aesthetic treatment along Potrero Grande Drive to reduce aesthetic impacts of the proposed project. MM AES-3 requires design

approval of the final Landscape and Aesthetic Treatment Plan by the City prior to construction. With implementation of MM AES-2 and MM AES-3, impacts under this criterion would remain significant and unavoidable for several years for views from KOP 3 before trees grow to maturity. As the trees in the landscaping mature, they would screen more of the substation and buildings and soften the contrast, and impacts would then be less than significant.

D2-59 The following revisions have been made to Section 4.1.3.3.

Page 4.1-42:

Figure 4.1-5h shows existing and potential views of the proposed project from KOP 6 looking west from the westbound (northern) lanes of the Pomona Freeway near its undercrossing of Greenwood Avenue. An updated visual simulation includes a 12-foot high perimeter wall.

D2-60 CPUC recognizes that SCE submitted a revised visual simulation for KOP 7 with its comment letter. However, KOP 7 is representative of views from the vicinity of the KOP, which includes the surrounding residential neighborhood. As such, LSTs and tubular steel poles (TSPs) that are taller than the existing LSTs and TSPs would still be seen in views from the vicinity of KOP 7 and would still alter views of the distant mountains. In addition, the new substation would include structures expanded over a broader area of the site. Based on the analysis of the revised visual simulation, aesthetic impacts for KOP 7 would still be significant. Although implementation of MM AES-5 would help reduce the impacts, they would remain significant after

implementation. For these reasons, the commenter's suggested changes have not been made.

D2-61 Based on SCE's comment, the following revisions to MM-AES-2 have been made in ES, 4.1, and MMRP.

Pages ES-5, 4.1-51 through 4.1-52, and 8-3:

MM AES-2: Minimize Clearing and Ground Disturbance and Restore Improve Disturbed Areas to Pre-Project Conditions. Clearing and ground disturbance required for construction, including but not limited to, access roads, pulling sites, construction and maintenance pads, and construction laydown areas, shall be the minimum required, and the applicant shall ~~restore~~ improve all disturbed areas not required for operation and maintenance to pre-construction conditions or better to the extent feasible. ~~Restoration~~ Improvement would not be feasible if, for example, a landowner other than SCE does not wish the area to be ~~restored~~ improved. Areas around new or rebuilt transmission structures that must be cleared during the construction process or other areas of ground disturbance shall be ~~regraded and revegetated to be restored to~~ an appearance that would replicate or improve pre-construction conditions. The CPUC shall verify appropriate ~~restoration~~ improvements of disturbed areas. For all paved areas (e.g., streets, sidewalks, and parking areas) disturbed by construction, the applicant shall restore these areas ~~to pre-project conditions~~ in compliance with permits for work within these areas.

D2-62 Based on SCE's comment, the following revisions to MM AES-3 have been made in ES, 4.1, and MMRP.

Pages ES-5, 4.1-52, and 8-3:

MM AES-3: Landscape and Aesthetic Treatment along Potrero Grande Drive.

Prior to construction, the applicant shall prepare a Landscape and Aesthetic Treatment Plan that will, at a minimum, provide vegetative screening, with the use of California native and/or drought tolerant vegetation, and other aesthetic treatments (e.g., decorative caps on block walls) along Potrero Grande Drive and in the vicinity of the new entry drive at the substation, and provide aesthetic treatment of the operations and test and maintenance buildings and their immediate surroundings. The Landscape and Aesthetic Treatment Plan shall not conflict with NERC CIP requirements in CIP-014-2 (Physical Security) or related NERC findings. Aesthetic treatments along Potrero Grande Drive shall include design enhancements for the masonry screening wall, adjacent walkway, pavement surfaces, and planting areas and may include raised and median planters or other design enhancements. Aesthetic treatment of the operations and test and maintenance buildings and their immediate surroundings shall include improved color selection and design for the buildings and landscaping of their surroundings that will help screen views of the buildings and blend them with their surroundings. All color finishes for built elements shall be flat and non-reflective. The final Landscape and Aesthetic Treatment Plan along Potrero Grande Drive shall be prepared by a professional landscape architect licensed to work in California. The applicant shall consult with the City of Monterey Park in development of the Landscape and Aesthetic Treatment Plan and both this plan and the final designs for the buildings shall be subject to design review and approval by the City. ~~The Landscape and Aesthetic Treatment Plan shall be provided to the CPUC for final review and receive final approval from the CPUC prior to construction of these buildings and aesthetic treatments along Potrero Grande Drive. The final approved Landscape and Aesthetic Treatment Plan shall be fully implemented within four months of beginning operation of the new substation.~~ The Landscape and Aesthetic Treatment Plan shall include the Landscape and Irrigation Plan and Wall Plan required to be submitted to the City for its review and approval as part of the overall permitting process. Copies of the final approved Landscape and Aesthetic Treatment Plan and associated City permits shall be provided to the CPUC prior to construction of these buildings and aesthetic treatments along Potrero Grande Drive. The final approved Landscape and Aesthetic Treatment Plan shall be fully implemented within four months of beginning operation of the new substation.

D2-63 KOP 7 is representative of views from the vicinity of the KOP (i.e., from the surrounding residential neighborhood) and the revised visual simulation submitted by SCE with its comments on the Draft EIR shows a conceptual view from within this area. As such, views from the vicinity of KOP 7 would include some metal structures other than the LSTs and TSPs that are up to 35 feet high, including transformer banks and new permanent buildings. For this reason, SCE's suggested modification to MM AES-5 has not been made. However, MM AES-5 has been modified as follows in ES, 4.1, and

MMRP to clarify the types of structures up to 35 feet high that would be subject to this mitigation measure.

Pages ES-5, 4.1-52, and 8-3:

MM AES-5: Glare Reduction. To reduce potential glare from components of the proposed project and help blend them into the landscape setting, the finishes on all new transmission and other structures with metal surfaces shall be non-reflective and new conductors shall be non-specular. With the exception of LSTs, TSPs, and switchracks, all metal structures up to 35 feet high, including transformer banks and new permanent buildings, visible from the vicinity of KOP 7 shall have finishes that are dark in color or otherwise colored to help blend the structures with their surroundings.

D2-64 The air quality analysis shows that unmitigated construction emissions would be above significance thresholds for reactive organic gases (ROG), carbon monoxide (CO), oxides of nitrogen (NO_x), particulate matter less than or equal to 10 microns in diameter (PM₁₀), and particulate matter less than or equal to 2.5 microns in diameter (PM_{2.5}). The analysis shows that use of higher tiered (Tier III and Tier IV) diesel engines will significantly reduce emissions. The use of higher tiered diesel engines, along with the other mitigation measures, will reduce actual PM₁₀ and PM_{2.5} emissions below significance thresholds; however, the ROG, NO_x, and CO emissions will still be above significance thresholds. While MM AQ-2 and MM AQ-4 require the purchase of volatile organic compound/ROG and NO_x offset credits to reduce emissions below significance thresholds, every effort must be made to reduce actual emissions.

Emission control technologies are commercially available today that can greatly reduce air pollutants emitted from existing diesel engines. Diesel retrofit technologies can significantly reduce PM, NO_x, CO, and ROG. The California Air Resources Board (CARB) provides a list of currently verified diesel retrofit technologies at: <http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm>

The CPUC recognizes that it may not be technically feasible to retrofit all lower tiered diesel equipment to reach Tier IV emission standards; however, any emission reductions that are technically feasible will benefit the air quality surrounding the construction sites. Therefore, SCE's due diligence to investigate and implement technically feasible control options for lower tiered diesel engines is required. The language in the mitigation measure has been revised to remove the requirement to reach Tier IV standards; however, retrofit control strategies must still be investigated and implemented if possible.

The text has been revised as follows.

Pages ES-6, 4.2-21, and 8-4:

MM AQ-1: Construction Emission Reduction Measures. SCE shall implement the following emission reduction measures for all construction activities:

1. All off-road diesel-powered construction equipment with engines greater than

100 horsepower (hp) shall be compliant with Tier 4 off-road emissions standards where available. In the event that equipment with a Tier 4 engine is not available for any off-road engine larger than 100 hp, ~~that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NO_x to no more than Tier 4 emission levels.~~ SCE shall investigate all available diesel retrofit technologies to reduce emissions. Any technologically feasible retrofit control technologies must be implemented. If emission levels equivalent to Tier IV standards cannot be reached, the emissions shall be reduced to the maximum extent possible based on the selected retrofit technology. Diesel retrofit technologies investigated shall include, but are not limited to, the Air Resource Board currently verified diesel emission control strategies. SCE shall document the results of its investigation for review by the CPUC.

2. All off-road diesel-powered construction equipment with engines greater than 50 hp shall be compliant with Tier 3 off-road emissions standards where available. In the event that equipment with a Tier 3 engine is not available for any off-road engine larger than 50 hp, ~~that engine shall be operated with tailpipe retrofit controls that reduce exhaust emissions of NO_x to no more than Tier 3 emission levels.~~ SCE shall investigate all available diesel retrofit technologies to reduce emissions. Any technologically feasible retrofit control technologies must be implemented. If emission levels equivalent to Tier III standards cannot be reached, the emissions shall be reduced to the maximum extent possible based on the selected retrofit technology. Diesel retrofit technologies investigated shall include, but are not limited to, the Air Resource Board currently verified diesel emission control strategies. SCE shall document the results of its investigation for review by the CPUC.
3. Equipment with an engine not compliant with the Tier 3 or Tier 4 standards, as applicable, will be allowed on a case-by-case basis only when the applicant has documented that no Tier 3 or Tier 4 equipment (or emissions equivalent retrofit equipment) is available for a particular equipment type. Each case shall be documented with signed written correspondence by the appropriate construction contractor, along with documented correspondence from at least two construction equipment rental firms representing a good faith effort to locate engines that meet Tier 3 or Tier 4 requirements, as applicable. Documentation will be submitted to CPUC staff for review before equipment is used on the project.

D2-65 Concerning SCE's comment on item 4, the verification of equipment tier and any applicable control technologies is required to ensure actual emissions are mitigated to the extent practicable. However, the language in the mitigation measure has been revised to allow for unforeseen equipment replacement.

Pages ES-6, 4.2-22, and 8-9:

4. Submit to CPUC staff and/or construction monitors a copy of each piece of construction equipment's certified tier specification, best available control technology (BACT) documentation, and/or CARB or SCAQMD operating permit, as applicable, at least 15 days prior to mobilization of each applicable unit of equipment. In the event that unforeseen equipment replacement is required

after the initial notification, replacement equipment may be used so long as notification is submitted 24 hours prior to mobilization of the replacement equipment.

D2-66 The CPUC agrees with SCE that tracking use will take effort on the part of SCE and the reviewing agency; however, tracking actual emissions from equipment use is not unusual. For example, the Aliso Canyon Turbine Replacement project, for which CPUC is the Lead Agency, required daily tracking.

Tracking would ensure that adequate credits are purchased to mitigate volatile organic compound/ROG emissions to less than significant levels. Past projects have shown that emissions estimates have varied widely from actual emissions. For example, on the Aliso Canyon Turbine Replacement project, estimated emissions were overestimated for all years of construction even with fine-tuning based on previous years' data. Equipment tracking during construction gives the CPUC data to ensure that underestimation—and therefore under mitigation—do not occur. Without usage data, there is no way to validate MM AQ-2. The CPUC has therefore decided that tracking is needed in order to monitor adequate implementation of MM AQ-2.

MM AQ-2 has not been revised in response to SCE's comment.

D2-67 The air quality analysis shows that unmitigated construction emissions would be above significance levels for NO_x. The analysis shows that the use of higher tiered diesel engines (Tier III and Tier IV) would significantly reduce NO_x emissions; however, the NO_x emissions would still be above significance thresholds. While MM AQ-4 requires the purchase of NO_x offset credits to reduce NO_x emissions below significance thresholds, every effort must be made to reduce actual emissions.

The revisions to MM AQ-1 (see response to D2-65) require NO_x emission controls to the extent practicable; therefore, the language in MM AQ-3 has been revised to eliminate Option 2 given that best available control technology devices would not be available for the proposed project.

Pages ES-6, 4.2-22, and 8-5:

MM AQ-3: Measures to Reduce NO_x Emissions. Prior to construction, the applicant and SCE will submit proposed additional measures to reduce daily emissions of NO_x to CPUC staff for review and approval, with the measures implemented depending on the amount of Tier III and Tier IV engines available at the time of construction. Measures may include the following:

1. The use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export) or the use of trucks that meet EPA 2007 model year NO_x emissions requirements if 2010 model year or newer diesel trucks cannot be obtained.
2. ~~A requirement that, during project construction, all construction equipment shall be outfitted with BACT devices certified by CARB and that achieve emissions reductions that are no less than what could be achieved by a Level 3~~

~~diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.~~

3. Other measures as determined appropriate by the applicant ~~and SCE~~ in consultation with the SCAQMD.

D2-68 See response to comment D2-66.

D2-69 The following change to the description of non-native vegetation was made based on recommendations from SCE.

Page 4.3-6:

This vegetation type is dominated by weedy non-native plants that thrive in areas repeatedly disturbed by human activity. In the proposed project area this vegetation type includes crimson fountain grass (*Pennisetum setaceum*), black mustard, short-podded mustard, wild radish, tocalote (*Centaurea melitensis*), prickly lettuce (*Lactuca serriola*), telegraph weed (*Heterotheca grandiflora*), Russian thistle (*Salsola tragus*), woolly mullein (*Verbascum thapsus*), and sweet fennel (*Foeniculum vulgare*). This habitat type typically supports few wildlife species but is used extensively by coastal California gnatcatcher for foraging and breeding to the south of the current Mesa Substation. Non-native vegetation within the proposed project area also supports foraging loggerhead shrike ~~and least Bell's vireo~~.

D2-70 SCE identifies that some information provided in Appendix F of the Draft EIR (Rare Plant Survey Report) was not incorporated into Table 4.3-2 and suggests different conclusions for several species in Table 4.3-2. These changes suggested by SCE clarify, amplify, or make insignificant modifications to the EIR. The following three specific changes are suggested to this table by SCE:

1. Adding that Nevin's barberry was observed during a protocol survey in 2015 and that the surveying biologist noted the individual appeared to be planted.

The following change was made to the EIR to provide additional information about species occurrences:

Page 4.3-13:

Present: This species was observed in Whittier Narrows Natural Area adjacent to an existing distribution pole and paved pathway within the corridor for Telecommunications Route 3 during December 2014 field surveys and spring 2015 protocol surveys; however, it appears to be a planted individual.

2. Modifying the listed potential to occur for intermediate mariposa-lily, Plummer's mariposa-lily, and Southern tarplant to reflect either a low potential to occur or that the species is absent from the proposed project area to reflect the 2015 Protocol Rare Plant Survey.

The rare plant survey report was included in the Draft EIR as Appendix F. Table 4.3-2 of the Draft EIR describes special status plant species present in the proposed project area or with a moderate or high potential to occur in the project area. Although the intermediate mariposa-lily, Plummer’s mariposa-lily, and Southern tarplant were not observed during protocol surveys, they meet the definition of having a moderate or high potential to occur as defined on page 4.3-12. In the EIR, a species was considered to have a moderate potential to occur if three conditions were met:

1. The project area is located within the geographic range of the species.
2. Habitat is present in the project area but is of poor to marginal quality.
3. The species was observed between 1 and 5 miles from the proposed project area within the last 20 years.

Species were considered to have a high potential to occur if three conditions were met:

1. The project area is located within the geographic range of the species.
2. Suitable habitat is present in the project area.
3. The species has been observed within the last 20 years in the project area or within 1 mile of the project area.

The species’ potentials to occur continue to meet these definitions listed in the Draft EIR. Lack of observed occurrences on the proposed Project site during 2015 protocol surveys is not determinative. The project area remains within the geographic range of these species. Poor to marginal quality habitat for the lilies is onsite, and populations 1 to 5 miles away were documented in 2015; therefore, both intermediate and Plummer’s mariposa-lily continue to meet the definition of moderate potential to occur. Southern tarplant was observed within a half a mile and suitable habitat occurs along Telecommunications Route 3 adjacent to the Rio Hondo; thus, Southern tarplant continues to meet the definition of high potential to occur. Changes to the existing determination of potential to occur were not made because the definitions and determinations of likelihood were based on expert analysis and substantial evidence and still apply, even after consideration of SCE’s comment. However, the following modifications to descriptions of the each plant were made to include additional detail from the referenced survey.

Page 4.3-13:

Nevin’s barberry (<i>Berberis nevinii</i>)	FE/CE/1B.1	Occurs in sandy or gravelly substrate in chaparral, cismontane woodland, coastal scrub, and riparian habitats. Blooms: March–June	<i>Present:</i> This species was observed in Whittier Narrows Natural Area adjacent to an existing distribution pole and paved pathway within the corridor for Telecommunications Route 3 during December 2014 field surveys <u>and spring 2015 protocol surveys; however, it appears to be a planted individual.</u>
Intermediate mariposa-lily (<i>Calochortus</i>)	-/-/1B.2	Occurs in rocky and calcareous substrate in chaparral, coastal scrub, and valley and foothill	<i>Moderate:</i> Suitable habitat for this species occurs along Telecommunications Route 3 where it

<i>weedii</i> var. <i>intermedius</i>)		grassland habitats. Elevation: 350 to 2,800 feet Blooms: May–July	parallels East Lincoln Avenue. CNDDDB occurrences from 2008-2010 are located in the Puente Hills area, approximately 2.5 miles south of Telecommunications Route 3. <u>Spring 2015 protocol surveys also documented this species in the same Puente Hills area as 2008-2010 CNDDDB occurrences.</u>
Plummer’s mariposa-lily (<i>Calochortus plummerae</i>)	-/-/4.2	Occurs in granitic or rocky substrate in chaparral, cismontane woodland, coastal scrub, lower montane forest, and valley and foothill grassland habitats. Blooms: May–July	<i>Moderate:</i> This species has been recorded extensively in the Puente Hills area, approximately 2.5 miles south of Telecommunications Route 3. Suitable habitat occurs along Telecommunications Route 3 where it parallels East Lincoln Avenue. <u>Spring 2015 protocol surveys also documented this species in the Puente Hills area.</u>
Southern tarplant (<i>Centromadia parryi</i> ssp. <i>Australis</i>)	-/-/1B.1	Occurs in the margins of marshes and swamps, vernal mesic valley and foothill grasslands, and vernal pool habitats. Blooms: April–June	<i>High:</i> Suitable habitat for this species occurs along the banks of the Rio Hondo River within the proposed corridor for Telecommunications Route 3. A CNDDDB occurrence from 2010 documented at least 2,000 plants less than half a mile from Telecommunications Routes 1 and 3. In addition, a Calflora observation entry made in April 2015, documented 12 individuals in the same area as the 2010 CNDDDB record. During surveys conducted in May 2015 an additional observation of this species was made east of Telecommunications Route 1. The species was sited outside of the survey area within the boundaries of an adjacent gun club.

3. Incorporating the Coulter’s matilija poppy into Table 4.3-2.

Coulter’s matilija poppy is a California Native Plant Society (CNPS) rare plant ranked 4.2 and was identified during 2015 protocol rare plant surveys within the project survey area. The Draft EIR identified the presence of this species in Appendix F, the “Rare Plant Survey Report.” The report describes the observation of a small patch of Coulter’s matilija poppy (three individuals) within the Wittier Narrows Natural Area adjacent to a nature trail near Telecommunication Route 3. The report concludes that the poppy occurrence was planted and is outside project impact areas; examination of disturbance area locations confirms that the occurrence is outside planned project areas, including outside the known access road in Wittier Narrows. There are no other known occurrences within 5 miles of the project area, based on the CNDDDB. Although not expected, if an individual of this species were to propagate in an area that would be impacted, mitigation already identified in the Draft EIR would avoid or reduce impacts to less than significant, including MM BR-8: Restoration of Special-status Plants. The following changes to the EIR were made.

Page 4.3-12:

<p><u>Southern California black walnut</u> (<i>Juglans californica</i>)</p>	<p>-/-/4.2</p>	<p>Occurs in alluvial chaparral, cismontane woodland, and coastal scrub habitats.</p> <p>Blooms: March–May</p>	<p><i>Present:</i> This species was observed on the Mesa Substation site during botanical surveys conducted in 2009 and 2010. It was subsequently observed in December 2014 adjacent to Telecommunications Route 3 and along Lincoln Boulevard.</p>
<p><u>Coulter’s matilija poppy</u> (<i>Romney coulteri</i>)</p>	<p>-/-/4.2</p>	<p><u>Occurs in chaparral and coastal sage scrub, often in burn areas.</u></p> <p><u>Blooms: March – July</u></p>	<p><i>Present:</i> <u>This species was observed during spring 2015, within the Whittier Narrows Natural Area. The occurrence is located adjacent to a nature trail and existing distribution pole within Telecommunications Route 3 and appears to be a planted population.</u></p>
<p>Nevin’s barberry (<i>Berberis nevinii</i>)</p>	<p>FE/CE/ 1B.1</p>	<p>Occurs in sandy or gravelly substrate in chaparral, cismontane woodland, coastal scrub, and riparian habitats.</p> <p>Blooms: March–June</p>	<p><i>Present:</i> This species was observed in Whittier Narrows Natural Area adjacent to an existing distribution pole and paved pathway within the corridor for Telecommunications Route 3 during December 2014 field surveys and spring 2015 protocol surveys; however, it appears to be a planted individual.</p>

Page 4.3-32:

Additional mitigation measures specific to individual special-status species that have a moderate to high potential for presence, and may be impacted as a result of construction activities, are discussed in further detail below, by species. Special-status plants that are known to be present in the project area include Nevin’s barberry, ~~and Southern California black walnut, and Coulter’s Matilija poppy.~~ The

Southern tarplant, Plummer’s mariposa-lily, and intermediate mariposa-lily have a moderate potential to occur.

Page 4.3-34:

Coulter’s Matilija Poppy

Coulter’s Matilija poppy is not listed under FESA or CESA. However, Coulter’s Matilija poppy is a CNPS rare plant ranked 4.2, meaning it is of limited distribution and moderately threatened in California. This species was identified during 2015 protocol rare plant surveys within the project survey area. During these surveys, a small patch (three individuals) of the poppy was observed within the Whittier Narrows Natural Area adjacent to a nature trail near Telecommunications Route 3. The report generated from the surveys (Appendix F) concludes that the species occurrence was planted and would be outside of the proposed project area. There are no other known occurrences of this species within a 5-mile radius of the proposed project area.

No project activities, including ground disturbance, equipment use, or vegetation

removal, are planned that would impact the known poppy occurrence. The nearest work activities would consist of installing telecommunications line on an existing pole approximately 100 feet away. SCE would utilize an existing access road and paved Nature Center trail south of the occurrence to install the cable and for maintenance activities during operations. While not expected, if an individual of this species were to be found in an area that would be impacted during construction, construction activities may result in direct impacts to the species. Indirect impacts could occur from the generation of fugitive dust or the spread of invasive weeds. These impacts to the poppy would be significant.

APM-BIO-01 and APM-BIO-02 would reduce impacts to this species by requiring pre-construction surveys for special-status plants and the development of a Revegetation Plan, and APM-AIR-01 would reduce excessive dust build-up that could indirectly impact this species; however, impacts would still be significant. Implementation of MM BR-1 would require pre-construction surveys in all areas of temporary and permanent disturbance. MM BR-2 would require that project work areas be clearly delineated to prevent inadvertent encroachment that would impact sensitive species or their habitat. MM BR-4 would require the preparation of a Noxious and Invasive Weed Control Plan and outlines requirements that must be included in the plan in order to reduce impacts associated with the spread of noxious and invasive weeds. MM BR-5 would require workers receive training in plant identification, the proposed project's environmental commitments, and how best to avoid impacting sensitive plant species. If a Coulter's Matilija poppy is found within the proposed project area, MM BR-8 would require avoidance or mitigation. Implementation of identified APMs, MM BR-1, MM BR-2, MM BR-4, MM BR-5, and MM BR-8 would reduce impacts on Coulter's Matilija poppy to a less than significant level.

Page 4.3-62:

MM BR-8: Restoration of Special-status Plants. The applicant shall complete pre-construction surveys during the appropriate blooming period to identify special-status plants, including Coulter's Matilija poppy, Plummer's mariposa lily, intermediate mariposa lily, and Southern California tarplant populations in the proposed project component areas where suitable habitat is present. Special-status plants shall be identified by a qualified biologist and flagged or surrounded with fencing in such a way that disturbance of the populations or individuals shall be avoided.

- D2-71 SCE requests the EIR be revised to say that least Bell's vireo was seen foraging during migration and not observed foraging at the Mesa Substation, but rather at the 500-kV transmission corridor adjacent to the substation. The text in Table 4.3-3 of the EIR has been revised to clarify where in the Mesa Substation area the occurrence was observed. The Biological Resources Technical Report (Appendix D of the Draft EIR) concludes that the species was observed foraging at the Mesa Substation site. The commenter does not provide sufficient evidence (e.g., additional information in a survey report) that the species was observed migrating instead of residing in the area; therefore, the EIR is not modified to identify this occurrence as "during migration" to avoid potential confusion.

Table 4.3-3 was revised as follows in response to this comment.

Page 4.3-16:

<p>Least Bell's vireo (<i>Vireo bellii pusilus</i>)</p>	<p>FE/CE</p>	<p>The least Bell's vireo is a rare, local summer visitor to the project area that nests between mid-March and the end of August and ranges from sea level in coastal areas to approximately 1,500 feet in the interior areas. Least Bell's vireos breed in willow riparian thickets with good overstory and understory vegetation in Southern California, usually where flowing water is present. This species typically inhabits structurally diverse woodlands along watercourses, including oak woodlands, mulefat scrub, and cottonwood-willow forests. During the breeding season, this species may forage in adjacent upland habitats. Little is known about this species' winter habitat, but it is not exclusively dependent on riparian woodland during winter. In winter, least Bell's vireos primarily occur in mesquite scrub vegetation in arroyos, but some also use palm groves and hedgerows associated with agricultural fields and rural residential areas. Breeding typically occurs from late March to late September.</p>	<p><i>Present:</i> Least Bell's vireos were observed nesting and foraging primarily in riparian areas along Telecommunications Route 3 and foraging within the proposed Mesa Substation site area and within the 500-kV transmission corridor adjacent to the Mesa Substation <u>500-kV transmission corridor.</u></p>
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D2-72 The following changes have been made to clarify the Draft EIR's description of California black walnut, Nevin's barberry, and Southern tarplant's status as a special-status species.

Page 4.3-33:

The California black walnut ~~is ranked as an S3 species, indicating that the species is vulnerable (CDFW 2010). In addition, it is ranked by the CNPS as 4.2, indicating that the species is of limited distribution and is fairly endangered~~ moderately threatened in California (CNPS 2015).

Page 4.3-32:

Nevin's barberry is listed as endangered under the CESA and FESA and has a CNPS rare plant ranking of 1B.1, meaning that it is rare, threatened, or endangered in

California and elsewhere and is ~~extremely endangered~~ seriously threatened in California

Page 4.3-34:

Southern tarplant is not listed under FESA or CESA. However, it has a CNPS rare plant ranking of 1B.1, meaning that it is rare, threatened, or endangered in California and elsewhere and is ~~extremely seriously endangered~~ threatened in California. This species is known to emerge readily after disturbance creates openings in the herbaceous layer. The species also contributes substantially to the soil seedbank (CCBER n.d.).

Additional changes were made to ensure consistency throughout the section regarding CNPS rare plant ranking definitions.

Page 4.3-14:

Southern tarplant <i>(Centromadia parryi ssp. australis)</i>	-/-/1B.1	Occurs in the margins of marshes and swamps, vernal mesic valley and foothill grasslands, and vernal pool habitats. Blooms: April-June	<i>High:</i> Suitable habitat for this species occurs along the banks of the Rio Hondo River within the proposed corridor for Telecommunications Route 3. A CNDDDB occurrence from 2010 documented at least 2,000 plants less than half a mile from Telecommunications Routes 1 and 3. In addition, a Calflora observation entry made in April 2015, documented 12 individuals in the same area as the 2010 CNDDDB record. During surveys conducted in May 2015 an additional observation of this species was made east of Telecommunications Route 1. The species was sited outside of the survey area within the boundaries of an adjacent gun club.
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Sources: Calflora 2015, CNDDDB 2015, CNPS 2015, USFWS 2015, Insignia 2015b.

Key:

- FE Listed as endangered under the federal Endangered Species Act.
- CE Listed as endangered under the California Endangered Species Act.
- CNDDDB California Natural Diversity Database
- 1B.1 Rare, threatened, or endangered in California and elsewhere. ~~Seriously threatened~~ ~~Extremely endangered~~ in California.
- 1B.2 Rare, threatened, or endangered in California and elsewhere. ~~Moderately threatened~~ ~~Fairly endangered~~ in California.
- 4.2 Plants of Limited Distribution. ~~Moderately threatened~~ ~~Fairly endangered~~ in California.

Page 4.3-35:

Plummer's mariposa-lily is not listed under FESA or CESA. However, it has a CNPS rare plant ranking of 4.2, which means that it is a species of limited distribution and ~~moderately threatened~~ ~~fairly endangered~~ in California. Potential habitat for this species occurs along Telecommunications Route 3; however, this habitat is not of

high quality.

Page 4.3-11:

These are further subcategorized by threat ranks:

- 0.1: Seriously threatened ~~endangered~~ in California
- 0.2: Moderately threatened ~~Fairly endangered~~ in California
- 0.3: Not very threatened ~~endangered~~ in California

D2-73 Southern tarplant's potential to occur in the proposed project area meets the definition of "high potential to occur" as shown in the response to comment D2-70. The following correction to the description of the species' potential to occur was made.

Page 4.3-35:

Work within suitable habitat where this species has high ~~moderate~~ potential to occur primarily includes installation of telecommunications cable on existing poles. A 275-foot segment of telecommunications cable at the eastern terminus of Telecommunications Route 1 would also be installed underground in new conduit.

SCE comments that the California Department of Fish and Wildlife (CDFW) defines populations as occurrences in its California Natural Diversity Database (CNDDDB). Further, SCE asserts that new occurrences of the species, up to 0.25 miles away, would be considered the same population as those plants recorded nearby in CNDDDB and, because of this, impacts to a few individuals of a larger population would not necessarily constitute a significant impact.

CDFW has explained its mapping methodology for CNDDDB in an introductory video available on its website: <https://www.wildlife.ca.gov/Data/Training>. Based on information in this tutorial, CDFW does not map populations of species on CNDDDB. When evaluating individual species occurrences, even those reported with precise GPS coordinates, CDFW maps a minimum buffer of 1/8 mile around the coordinate. If two occurrences are close enough that the minimum buffer overlaps (i.e., within 1/4 of a mile), the occurrences are grouped together and considered to be the same. Specific polygons in CNDDDB made up of several nearby occurrences may indicate a population of individual plants, but may also be multiple reports of the same individual, or may be separate individuals that are not considered a population. For these reasons, it cannot be concluded that an individual discovered in the Telecommunications Route 3 impact area would be automatically categorized by the CNDDDB as part of the known nearby population. In addition, protocol surveys cannot prove absence of a species in a given area in the future, as the species may populate a new area. Thus, the reasons SCE provides for the substitution of "would" for "could" are not supported by the evidence presented.

CEQA Guidelines section 15064(f) requires that "[t]he decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency." The analysis of impacts on Southern tarplant is supported by substantial evidence, including analysis of potential habitat and known occurrences

from multiple sources, including the Biological Resources Technical Report (Appendix D of the Draft EIR) and the rare plant surveys (Appendix F of the Draft EIR), as well as information regarding the CNDDDB from CDFW. The conclusions in the EIR are supported by substantial evidence in the record, and therefore no changes were made to the EIR in response to this comment.

- D2-74 Plummer's mariposa-lily's potential to occur in the proposed project meets the definition of "moderate potential to occur" as discussed in the response to comment D2-70. SCE's additional recommendations are based on the assertion that the likelihood should be changed from "moderate potential" to "absent." Therefore, no further edits based on SCE's comment have been made.
- D2-75 Intermediate Mariposa-lily's potential to occur in the proposed project meets the definition of "moderate potential to occur" as discussed in the response to comment D2-70. SCE's additional recommendations are based on the assertion that the likelihood should be changed from moderate potential to absent. Therefore, no further edits based on SCE's comment were made.
- D2-76 SCE asserts that the discussion of impacts on amphibians within Impact BR-1 should be modified because they could not practically install fencing during telecommunication line stringing and that fencing could increase biological impacts. However, MM BR-2 does not require the installation of exclusionary fencing in all areas. MM BR-2 requires installation of exclusionary fencing around laydown and work and staging areas, where necessary and appropriate, to prevent inadvertent encroachment into adjacent habitat or the encroachment of special status species into work areas. As stated by SCE, the installation of fencing along roads for stringing telecommunications line may not be necessary and appropriate due the absence of ground disturbance activities or lack of adjacent habitat at these locations. Therefore, the EIR was not revised per SCE's suggestion in this comment; however, the following change was made to clarify the use of exclusionary fencing.

Page 4.3-36:

Therefore, SCE would implement MM BR-1, which requires pre-construction surveys; MM BR-2, which requires installation of exclusionary fencing to delineate the designated work areas and avoid sensitive resources, such as western spadefoot, as necessary and appropriate; MM BR-5, which requires implementation of a WEAP to inform workers of the sensitive biological resources with a potential to be impacted by the project and relevant permits; MM BR-9, which requires the appropriate level of construction monitoring by a qualified biologist; and MM BR-10, which requires covering steep walled trenches and excavations at the end of each work day.

- D2-77 The comment recommends text edits regarding white-tailed kite and additional text explaining why raptors are not discussed separately.

Nesting raptors are protected under the Migratory Bird Treaty Act and California Fish and Game Code, and impacts from construction activities could potentially occur on nesting raptors even though the potential for nesting of special-status raptor species is

low. Contrary to SCE's comment that raptors are not discussed further, raptors are included in the general discussion of impacts from construction activities on nesting birds; thus, "raptors will not be discussed further" was not added to the text.

In response to this comment, the EIR text is modified as follows.

Page 4.3-39:

The proposed project area contains suitable habitat for several special-status birds as well as those protected by the MBTA and Fish and Game Code. Raptor species, such as the peregrine falcon, white-tailed kite, and Swainson's hawk, were observed within the main project area during surveys and may have been foraging or flying through. Due to limited habitat, nesting of any of these raptor species in the proposed project area would be rare. Raptors likely would only occur during migration and/or foraging. In addition, coastal California gnatcatcher, least Bell's vireo, loggerhead shrike, and yellow warbler have been observed within the proposed project area and are therefore assumed to be present.

D2-78 SCE suggests that the areas of potential impact on coastal California gnatcatcher habitat in Table 4.3-4 of the Draft EIR should be separated into impacts on coastal sage scrub versus on "atypical habitat." (SCE's label for Table "3.4-4" appears to be a typographical error.) SCE also suggests revised acreage for these new categories. However, SCE does not define "atypical habitat" in the comment, and the Total Approximate Impact Area in the suggested revised table does not add up to be the sum of its column or row. Although the 2015 Biological Assessment included as Appendix G uses "atypical habitat," it does not define the vegetation or habitat types considered "atypical;" the Biological Assessment also acknowledges that gnatcatcher breeding has occurred in what it describes as "atypical habitat." Because of the lack of information and unclear acreage numbers, the CPUC cannot provide a specific response to the suggested revisions to the table.

Table 4.3-4 in the Draft EIR describes the impact areas as "approximate" and mitigation for actual impacts to gnatcatcher habitat would be finalized during the implementation of MM BR-3 and would be based on actual impacts. Thus, if the impacts are less than the amount approximated in Table 4.3-4, then only those impacts would require mitigation.

The Draft EIR uses the same considerations as the Biological Resources Technical Report (Appendix D of the Draft EIR) for determining suitable habitat for coastal California gnatcatcher. In the Draft EIR (page 4.3-40), suitable habitat is considered to be:

- Coastal sage scrub with greater than 50 percent cover, consisting of species such as California sagebrush and or California buckwheat, or
- Areas consisting of a matrix of sparse, scattered coastal sage scrub shrubs and annual/biennial vegetation with sufficient morphological structure and density to support coastal California gnatcatcher nesting and provide foraging opportunities.

As shown by comparing Figure 5 of Appendix D with Figure 4.3-1 of the Draft EIR, coastal California gnatcatcher has been observed numerous times over multiple years foraging and nesting in native and non-native vegetation in the project area. Figure 10 of Appendix D shows areas of expected temporary and permanent impacts on gnatcatcher habitat and considers native and non-native vegetation to be gnatcatcher habitat. Table 4.3-4 of the Draft EIR is consistent with the definition of gnatcatcher habitat described above and utilized in these figures. Much of the vegetation shown in these maps is considered non-native but is also considered suitable habitat based on the criteria in the second bullet point above, and the Biological Resources Technical Report (Appendix D) considers impacts on this non-native/ruderal vegetation to be impacts on coastal California gnatcatcher habitat. The 2015 protocol survey for gnatcatcher mentioned by SCE in the comment was considered in the Draft EIR and included as Attachment A of Appendix G. The 2015 survey found multiple gnatcatchers nesting and foraging in the project area and does not provide a new definition for gnatcatcher habitat, as claimed by SCE. It is unclear how this survey limits what is considered gnatcatcher habitat or reduces the area of impact on gnatcatcher habitat, as claimed by SCE.

Furthermore, USFWS commented that the remaining gnatcatcher habitat in the project area provides connectivity between gnatcatcher populations and is important for maintaining a viable population in the northern range of the species (Medak pers. comm. 2015). In addition, USFWS's comment on the Draft EIR acknowledges that the area adjacent to the Mesa Substation is gnatcatcher habitat, including the non-native vegetation that supports gnatcatcher foraging/sheltering, and the USFWS recommended an increase in mitigation ratio for all gnatcatcher habitat permanently impacted by the project. In these comments, USFWS does not discount non-native vegetation that supports gnatcatchers nor suggest less mitigation.

CEQA Guidelines section 15064(f) requires that "[t]he decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency." The analysis of impacts on gnatcatchers is supported by substantial evidence, including analysis of potential habitat presented in the Biological Resources Technical Report and the known occurrences from multiple sources, including the Biological Resources Technical Report and the 2015 gnatcatcher protocol surveys, as well as information from the USFWS. The commenter does not provide specific evidence as to why the analysis in the document is inadequate. The conclusions in the Draft EIR are supported by substantial evidence in the record, and no changes were made to the Draft EIR in response to this comment.

See also response to comment D1-20 for a discussion of gnatcatcher habitat.

D2-79 SCE asserts that ruderal vegetation and non-native vegetation is atypical habitat for coastal California gnatcatcher as described in the 2015 protocol surveys for gnatcatcher (included as Attachment A in Appendix G of the Draft EIR) and the EIR should not consider these areas "suitable habitat" for the gnatcatcher. SCE recommends changing the impact analysis to consider only coastal sage scrub as suitable habitat.

During preparation of the Draft EIR, USFWS commented that the remaining

gnatcatcher habitat in the project area, including the area within the substation footprint (which contains native and non-native vegetation), provides connectivity between gnatcatcher populations and is important for maintaining a viable population in the northern range of the species (Medak pers. comm. 2015). In addition, USFWS's comment on the Draft EIR (see comment A3-1) acknowledges that the area adjacent to the Mesa Substation is gnatcatcher habitat, including the non-native vegetation that supports gnatcatcher foraging/sheltering, and recommended an increase in the mitigation ratio for all gnatcatcher habitat permanently impacted by the project. In these comments, USFWS does not discount non-native vegetation that supports gnatcatchers nor suggest less mitigation for impacts on habitat with non-native vegetation.

The Draft EIR uses the same considerations as the Biological Resources Technical Report (Appendix D of the Draft EIR) for determining suitable habitat for coastal California gnatcatcher. In the Draft EIR (p. 4.3- 40), suitable habitat is considered to be:

- Coastal sage scrub with greater than 50 percent cover, consisting of species such as California sagebrush and or California buckwheat, or
- Areas consisting of a matrix of sparse, scattered coastal sage scrub shrubs and annual/biennial vegetation with sufficient morphological structure and density to support coastal California gnatcatcher nesting and provide foraging opportunities.

As shown by comparing Figure 5 of Appendix D with Figure 4.3-1 of the Draft EIR, coastal California gnatcatcher has been observed numerous times over multiple years foraging and nesting in native and non-native vegetation in the project area. Figure 10 of Appendix D shows areas of expected temporary and permanent impacts on gnatcatcher habitat and considers native and non-native vegetation to be gnatcatcher habitat. Table 4.3-4 of the Draft EIR is consistent with the definition of gnatcatcher habitat described above and utilized in these figures. Much of the vegetation shown in these maps is considered non-native but is also considered suitable habitat based on the criteria in the second bullet point above, and the Biological Resources Technical Report (Appendix D of the Draft EIR) considers impacts on this non-native/ruderal vegetation to be impacts on coastal California gnatcatcher habitat.

Multiple surveys conducted between 2011 and 2015 documented gnatcatchers using ruderal vegetation, non-native vegetation, and coastal sage scrub in this area. The 2015 protocol survey for gnatcatchers mentioned by SCE in the comment was considered in the Draft EIR; the survey is included as Attachment A of Appendix G of the Draft EIR. The 2015 survey found multiple gnatcatchers nesting and foraging in the project area and does not discount the previous years' occurrences in non-native vegetation. Nesting attempts and successful nesting have been documented within the non-native vegetation (Figure 5: Map 1 of 5 of the Draft EIR's Appendix D, Figure 3A of Attachment A of the Draft EIR's Appendix G, Figure 4.3-1 of the Draft EIR) and gnatcatchers appear to be utilizing non-native vegetation for foraging during nesting season as well. It is unclear how the 2015 survey redefines what is considered gnatcatcher habitat, why some of the gnatcatcher habitat in the area should be considered "atypical," or how it reduces the area of impact on gnatcatcher habitat, as claimed by SCE.

CEQA Guidelines section 15064(f) requires that “[t]he decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency.” The analysis of impacts on gnatcatchers is supported by substantial evidence, including analysis of potential habitat presented in the Biological Resources Technical Report and the known occurrences from multiple sources, including the Biological Resources Technical Report and the 2015 gnatcatcher protocol surveys, as well as information from the USFWS. The commenter does not provide specific evidence as to why the analysis in the document is inadequate. The conclusions in the Draft EIR are supported by substantial evidence in the record, and no changes were made to the EIR in response to this comment.

D2-80 SCE states its disagreement that least Bell’s vireo was observed foraging at the Mesa Substation site, asserts the potential for direct impact to the species would only occur within the Telecommunications Route 3, and recommends several changes to the Draft EIR.

The Biological Resources Technical Report prepared by Insignia Environmental in 2015 for SCE (Appendix D of the Draft EIR) cites surveys conducted, concludes that the species was observed foraging in the transmission corridor adjacent to the Mesa Substation, and considers it present. While SCE describes the mulefat scrub as of marginal quality, it does not provide sufficient information to support an alternate conclusion that the species would not have been observed foraging as a resident of the area. Therefore, SCE’s requested revision to emphasize migration was not made. However, the following revision was made to clarify where in the proposed project area the species was found.

Page 4.3-40:

Least Bell’s vireo is a federally and state endangered species. It has been observed foraging within ~~the proposed Mesa Substation site area and adjacent~~ the 500-kV transmission line corridor adjacent to the Mesa Substation as well as nesting along portions of Telecommunications Route 3. Construction activities, such as clearing vegetation and grading ~~within the proposed Mesa Substation site~~ in the transmission corridor and along Telecommunications Route 3, could result in direct impacts including injury or mortality to an individual least Bell’s vireo or the loss of a nest as a result of human presence, dust, or noise. Construction activities could also result in indirect impacts such as the disruption of nesting or foraging behaviors or the loss of habitat. Impacts to least Bell’s vireo would be significant.

D2-81 SCE commented that the protocol rare plant survey (Appendix F of the Draft EIR) should be included as evidence that no burrowing owls or signs were observed in the project area. However, the protocol plant survey report methodology and results do not provide any information on training of surveyors or search methodology by surveyors pertaining to burrowing owl or any wildlife. During the rare plant surveys, botanical specialists followed a specific protocol published by CDFW and CNPS as described in Appendix F; the protocol does not include searches for burrowing owl. SCE does not provide specific evidence that the rare plant survey may be used to

show the absence of or signs of burrowing owls. Therefore, no changes were made to the EIR.

- D2-82 SCE states that coordination of its O&M activities with Metropolitan Water District's O&M activities related to the relocated Middle Feeder pipe is needed and suggests including Metropolitan Water District's O&M activities in this section. The following clarification to the EIR has been made based on SCE's comment:

Page 4.3-44:

Operation of the proposed project would be similar to ongoing maintenance activities of existing electrical infrastructure and would include O&M activities related to MWD's relocated Middle Feeder. There would be no increase in the number of employees or level of service required to maintain the proposed infrastructure.

- D2-83 In this comment, the CPUC requested copies of SCE's applications for CWA permits and associated correspondence with the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW to verify updated impact acreages. SCE provided copies of their 1602 Notification of Lake and Streambed Alteration Agreement to CDFW, Section 401 Water Quality Certification to the RWQCB, and Section 404 Nationwide Permit Application to USACE. Information in the Section 401 application corresponds to SCE's suggested edit to the Draft EIR for acres of waters of the U.S. This change has been made to the EIR. Estimated impact acreage to jurisdictional streambed and associated riparian habitat listed in the 1602 Notification of Lake and Streambed Alteration Agreement is slightly lower than SCE's estimate provided in the comment. SCE's slightly higher estimate was added to the EIR based on SCE's suggestion. The following revision has been made to the EIR to reflect impact estimates from documents provided by SCE.

Page 4.3-51:

Construction activities within the proposed Mesa Substation site area, adjacent power line corridors, and work within staging yards would result in direct, permanent impacts on wetlands (including drainages) as defined by Section 404 of the CWA. Of the potentially jurisdictional aquatic features within the proposed project area, approximately ~~3.7~~ 0.37 acres of waters of the US (USACE/RWQCB) and 2.66 acres of jurisdictional streambed and associated riparian habitat (CDFW) may be permanently impacted, and much of these impacts would occur within the footprint of the new Mesa Substation (~~Insignia 2015b~~ SCE 2016). These impacts would result from grading associated with construction of the new 220-kV substation infrastructure on the western portion of the substation site, ground disturbance associated with site preparation and construction of the 500-kV substation infrastructure on the eastern portion of the substation site, installation of new fence around substation perimeter, constructing new access roads, and construction of a new retention basin in the southwest portion of the substation site.

- D2-84 SCE asserts that there is no justification for pre-construction surveys to be completed within 14 days prior to construction outside of the nesting bird season and

recommends altering the text in MM BR-1 to allow surveys to be performed up to 30 days before construction outside of the nesting season.

MM BR-1 requires that pre-construction surveys are completed by a qualified biologist and conducted for all sensitive biological resources, including special-status plants and wildlife. Surveys are not limited to nesting birds alone. Further, the measure indicates surveys shall be species and resource appropriate. Special status wildlife including western spadefoot toad, Belding's orange-throated whiptail, western pond turtle, southern grasshopper mouse, and several species of birds may occur throughout the year. A survey within 14 days of the beginning of construction in an area is an appropriate amount of time to schedule and perform surveys and develop any site- and resource- specific actions needed to minimize impacts on sensitive resources from project-related activities, while also minimizing the opportunity for new species to move into the area before construction actually begins. Once a pre-construction survey has been performed, the measure does not require that they are repeated as long as construction is ongoing in the area. To clarify the frequency of these surveys, the following changes were made to MM BR-1.

Pages ES-7, 4.3-57 through 4.3-58, and 8-11;

Prior to construction and activities in a new work area that may include vegetation clearing, staging, and stockpiling, or other activities with the potential to directly or indirectly affect wildlife, the applicant shall retain a qualified biologist approved by the CPUC to conduct pre-construction surveys for sensitive biological resources, including special-status plant species and special-status wildlife, and nesting birds in all areas of temporary and permanent disturbance. Pre-construction surveys shall be species and resource appropriate and typically conducted a maximum of 14 days prior to construction, as approved by the CPUC. If there is no work in an area for 14 days or more, the area shall be considered a "new work area" if construction begins again. Nesting bird and burrowing owl pre-construction surveys shall be consistent with the timing specified in the Nesting Bird Management Plan required by MM BR-11.

D2-85 SCE is correct that western-spadefoot toad is not listed under the federal Endangered Species Act or California Endangered Species Act. The comment also points out that exclusionary fencing is routinely utilized to mitigate impacts for listed reptiles and amphibians.

CEQA does not limit the consideration of biological impacts to listed species; rather a broader definition of endangered, rare, or threatened species is defined under section 15380 of the CEQA Guidelines. In compliance with CEQA's definitions of endangered, rare, or threatened species, the EIR considers impacts to "special-status species." Section 4.3.1.3 of the Draft EIR lists the criteria used to identify special-status species; special-status species include those listed by CDFW as Species of Special Concern (SSC). The western-spadefoot toad is a SSC and, therefore, it is considered a special-status species in the EIR. The implementation of exclusionary fencing to mitigate impacts to this species would also be appropriate given its status, as well as appropriate for other sensitive resources.

The intent of MM BR-2 is primarily to define the limits of construction and prevent project activities from encroaching into adjacent areas. As SCE points out, fencing could also be used to exclude reptiles and amphibians, including western spadefoot toad, from work areas that occur in their habitat. Fencing is a valid form of delineating a work area and may be the most appropriate way to do so in certain areas, such as areas used repeatedly (e.g., laydown, staging, and certain work areas). The appropriate use of fencing would reduce the level of monitoring required in those areas and, in many cases, the potential impact from installing the fence would be less than the potential impact on sensitive resources, such as the spadefoot toad, due to, for example, vehicle or equipment encroachment into habitat. In addition, fencing is more visible than signage or flagging in certain situations (e.g., by equipment drivers) and thus may help maintain compliance. As stated by SCE, the installation of fencing along roads for stringing telecommunications line may not be necessary and appropriate due to the absence of ground disturbing activities and absence of adjacent habitat at these locations.

The text has been modified to clarify that fencing is not required by MM BR-2, but remains an appropriate option.

Pages ES-7, 4.3-57, and 8-12:

In all locations of the project, construction activities, vehicular traffic (including movement of all equipment), and storage of construction materials shall be restricted to approved access roads and established construction areas indicated by flagging, fencing, and/or signage. The applicant shall ensure that exclusionary fencing is installed prior to the start of construction activities around laydown and work and staging areas, where necessary and appropriate, to prevent inadvertent encroachment into the project area by special status species and the inadvertent encroachment by project activities into habitat adjacent to areas of impact.

D2-86 SCE asserts that MM BR-3 may contain contradictory language and disagrees with an interpretation of the measure that requires the restoration of ruderal areas to coastal sage scrub. SCE claims there is no evidence that ruderal areas were previously coastal sage scrub and states that the ruderal vegetation is part of the preexisting condition and mitigation should not be required.

During preparation of the Draft EIR, USFWS (Medak pers. comm. 2015) commented that the remaining gnatcatcher habitat in the project area, including the area within the substation footprint, provides connectivity between gnatcatcher populations, is important for maintaining a viable population in the northern range of the species, and is critical for resiliency in response to changing vegetation and climatic conditions. USFWS recommended that the substation be designed to avoid and minimize impacts on gnatcatcher habitat, and that remaining open space surrounding the substation and within temporary impact areas be restored with native scrub habitat and managed in a manner that would support gnatcatchers over the long term.

Comments on the Draft EIR from CDFW and USFWS state that impacts from the temporal loss of sensitive communities, including communities that support coastal California gnatcatcher, remain significant with the mitigation described in the Draft

EIR's MM BR-3 and that mitigation for these communities should strive to result in superior habitat quality and quantity than that which was impacted to account for temporal loss (see comment A1-3). MM BR-3 has been revised to include recommendations from the wildlife agencies as shown in response to comment A1-3. SCE's recommendation to eliminate the restoration requirement for non-coastal sage scrub used by gnatcatcher contradicts recommendations and comments from the wildlife agencies and would reduce the effectiveness of mitigation to compensate for impacts due to, e.g., temporal loss. As recommended by both USFWS and CDFW, mitigation for impacts to gnatcatcher habitat should increase the quantity and quality of habitat used by the gnatcatcher in order to be effective. As discussed in responses to comments D1-20, D2-78, D2-79, gnatcatchers utilize non-coastal sage scrub habitat for forage, resting, and dispersal, and have also been documented as nesting in such areas.

CEQA Guidelines section 15064(f) requires that "[t]he decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency." The analysis of impacts on sensitive communities, including communities that support coastal California gnatcatcher, is supported by substantial evidence, including analysis of sensitive communities and suitable gnatcatcher habitat, as well as specific information from the USFWS. SCE does not provide specific evidence that the analysis in the document is inadequate. The conclusions in the Draft EIR are supported by substantial evidence in the record and expert analysis, and no changes were made to the EIR in response to this comment.

D2-87 SCE states that the existing sensitive natural communities within proposed project area do not have 80percent cover and MM BR-3 should be revised to require 70 percent relative cover to match the anticipated SWPPP's requirements. SWPPP requirements focus on soil stability and erosion prevention and they do not necessarily mitigate impacts to sensitive biological resources.

SCE appears to interpret the percent cover requirement in MM BR-3 to describe the density of the canopy for every sensitive natural community. However, the mitigation measure requires that at least 80 percent of the native plants restored would be successfully established after a minimum of four years. In response to this comment, the revised MM BR-3 text includes an edit to clarify the description of the 80 percent cover success criterion. The full text of the revised MM BR-3 is included in response to comment A1-3.

Pages ES-8, 4.3-58, and 8-12:

- All temporarily impacted areas shall be restored. All temporary disturbances to sensitive natural communities shall be restored with the pre-disturbance natural community (except for areas burned in the 2015 "Lincoln" fire, which shall be restored to the pre-fire natural community). All other temporarily impacted areas observed to be utilized by the coastal California gnatcatcher shall be restored with the appropriate coastal sage scrub community if feasible and appropriate. Temporary impacts on sensitive natural communities and habitat utilized by gnatcatchers shall be mitigated by restoration at a minimum ratio of 1.5:1; if restoration is not feasible within 1 mile of the project area, SCE shall purchase credits and/or mitigation lands at a minimum ratio of 2.5:1 from

an entity approved by CDFW and USFWS, as appropriate. Areas that do not provide habitat to coastal California gnatcatcher, other special-status species, or sensitive resources may be restored to the conditions agreed upon between the landowner and the applicant.

- The restoration plan shall specify how each type of vegetation community, including sensitive natural communities, shall be addressed in terms of the following restoration details: topsoil segregation and conservation; vegetation treatment and removal; revegetation methods, including seed mixes, rates, appropriate habitat structure, and transplants; criteria to monitor and evaluate revegetation success (minimum of four years of monitoring and 80% successful native plant establishment~~cover for sensitive natural communities~~); and compensation and remedial measures to be implemented as needed.
- For sensitive natural communities, mitigation of permanent impacts shall occur after construction at a minimum level of 1.5:1. In addition, permanent disturbances to coastal California gnatcatcher habitat that is not coastal sage scrub or another sensitive natural community shall be mitigated at a minimum 1.5:1 ratio with appropriate coastal sage scrub. Mitigation for permanent impacts shall be completed through one of the following methods:
 1. Establishing the natural community within the proposed project areas (onsite);
 2. Establishing the natural community outside the proposed project areas (within one mile of the project area); or
 3. If Options 1 and 2 are not feasible, SCE shall purchase credits and/or mitigation lands at a minimum ratio of 2.5:1 from an entity approved by CDFW and USFWS, as appropriate.

D2-88 SCE's comment asserts that ruderal habitat does not qualify as habitat for coastal California gnatcatcher except when it is adjacent to coastal sage scrub and that MM BR-3 requires mitigation for an existing condition. SCE suggests modifying MM BR-3 to reduce the mitigation ratio and modify restoration criteria. As stated in comment response D2-86, USFWS considers the open space surrounding the Mesa Substation to be gnatcatcher "habitat" and critical for the resiliency of the gnatcatcher. USFWS and CDFW both recommend mitigation ratios higher than those included in the Draft EIR and suggested by SCE in this comment. Revisions to the EIR to address the comments made by the wildlife agencies have been made as shown in response to comment A1-3.

While SCE correctly states that no regulatory framework specifically protects "atypical" or non-habitat for gnatcatcher, Appendix G of the CEQA Guidelines suggests biological impacts consider habitat modifications for special status species. In addition, the wildlife agencies, which have regulatory authority over this species (federal Endangered Species Act, California Fish and Game Code Section 3503), suggested that the remaining open space surrounding the substation and within temporary impact areas be restored with native scrub habitat to support gnatcatchers on the property in the future as mitigation for spatial and temporal temporary impacts on gnatcatcher habitat. MM BR-3, as revised, describes a level of restoration and mitigation deemed appropriate by the wildlife agencies and the CPUC.

CEQA Guidelines section 15064(f) requires that “[t]he decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency.” The analysis of impacts on sensitive communities, including communities that support coastal California gnatcatcher, is supported by substantial evidence, including recommendations by the wildlife agencies and the extensive documentation of gnatcatcher in ruderal, non-native, and coastal sage scrub in the project area. SCE does not provide specific evidence that the analysis in the document is inadequate. The conclusions in the Draft EIR are supported by substantial evidence in the record, and no changes were made to the EIR in response to this comment.

- D2-89 SCE makes the same assertions as those stated in comment D2-87. As written in the comment response to D2-87, SWPPP requirements focus on soil stability and erosion prevention and they do not necessarily correlate to restoration for impacts to biological resources. See response to comment D2-87.

Also, see the full text of revised MM BR-3 in response to comment A1-3.

- D2-90 SCE requests modifying the requirements of MM BR-3 to allow trimming conducted outside of the nesting bird season to occur without monitoring. MM BR-3 is intended to mitigate impacts on sensitive natural communities, all coastal California gnatcatcher habitat, and riparian habitat. To ensure trimming of native vegetation, riparian vegetation, and vegetation that provide habitat for coastal California gnatcatcher is kept to the minimum necessary and does not disturb any sensitive resources, monitoring is required. Trimming of native trees and arborescent shrubs also requires monitoring for the same reasons. SCE does not justify their request to modify the mitigation measure. Therefore, no changes were made based on SCE’s comment. However, the following change was made to clarify monitoring requirements.

Pages ES-8, 4.3-59, and 8-13:

To minimize the removal of vegetation in habitat areas of the coastal California gnatcatcher, SCE shall ensure that trimming of all native vegetation, riparian vegetation, and vegetation that provides potential habitat for coastal California gnatcatcher is monitored by a qualified biologist approved by the CPUC. Trimming of native trees and native arborescent shrubs shall be completed outside of the nesting bird season and shall be monitored by a qualified ~~arborist~~biologist.

- D2-91 SCE suggests revising the Draft EIR to eliminate the CDFW consultation requirement for the development of the Noxious and Invasive Weed Control Plan. MM BR-4 has been revised consistent with this recommendation.

Pages ES-8, 4.3-60, and 8-13:

This plan shall include measures designed to avoid the introduction and spread of noxious weeds and invasive plant species designated by the state, the counties, and local weed control boards. This plan shall be developed in consultation with ~~CDFW and the CPUC and shall be provided to these agencies for review and comment.~~ The ~~plan~~ must be submitted to the CPUC 60 days prior to the planned start of construction. CPUC approval is required before the plan is implemented.

D2-92 SCE states that the Mesa project is within the same weed zone. It is unclear what is meant by “weed zone;” however, SCE goes on to state that the project area consists entirely of invasive species. SCE claims that the addition of water to the site via wash stations, even when contained, would increase biological impacts because annual invasive plants would increase near the wash stations.

While the proposed project lies within an urbanized area where non-native invasive plants are prevalent, a variety of vegetation types and native plant species were documented in biological surveys. As described in Table 4.3-1 of the Draft EIR, “Vegetation Communities in the Survey Area,” plant communities with native species include California Annual Grassland, Diegan Coastal Sage Scrub, Mulefat Scrub, Riparian Woodland, Southern California Walnut Woodland, Southern Coast Live Oak Woodland, Southern Sycamore-Alder Riparian Woodland, Intermittent Drainages, and Ephemeral Drainages. Wash stations, when installed and used properly, will contain any water potentially containing plant parts or seeds. Wash station water is then disposed of at a waste management facility or incinerator. Prevention of invasive weed spread will reduce impacts to areas with native plants, native vegetation types, and would increase the likelihood that temporarily impacted areas are successfully restored. Therefore, no change to the EIR was made.

D2-93 To incorporate SCE’s recommendations regarding invasive species monitoring, the following changes to MM BR-4 (Noxious and Invasive Weed Control Plan) have been made:

Pages ES-9, 4.3-60, and 8-13:

- All seeds to be used in revegetation and reclamation activities shall come from weed-free sources.
- All temporary disturbance areas that will be restored post-construction shall be monitored for invasive species establishment on a monthly basis during the growing season and on a quarterly basis outside of the growing season for at least one year after project restoration is completed. If evidence of the expansion or increase in abundance of a known invasive species or introduction of a new invasive species is found, the applicant shall initiate appropriate control measures, which may include mowing or trimming of weeds prior to seed set, as outlined in the plan.

Several natural communities, including sensitive natural communities, were found onsite during surveys as described in Table 4.3-1 of the Draft EIR. Loss of habitat would be a significant impact to several species as described under Impact BIO-1 of the Draft EIR and significant for sensitive natural communities as described under Impact BIO-2. MM BR-3 requires temporarily disturbed areas be restored to pre-construction sensitive natural communities, if present prior to construction, or coastal sage scrub if feasible. Restoration success criterion is defined as 80 percent successful native plant establishment. SCE would be required to monitor for non-native invasive species such that they not exceed 20 percent of the plant establishment at restoration areas. Therefore, no further changes to the EIR were made based on this comment.

D2-94 Impact BIO-1 of the Draft EIR discusses impacts on Nevin’s barberry. Direct and indirect impacts on this species, a state and federally listed endangered species, could occur from activities associated with installation of a telecommunications line including trampling during stringing or pulling, driving over the plant, and the spread of fugitive dust or weeds. If these impacts occurred, impacts from these activities would be significant. MM BR-6 requires that the proposed project is designed to avoid direct and indirect impacts on Nevin’s barberry by ensuring project activities avoid the plant. SCE states that surveys for the proposed project were conducted previously and sufficiently meet the survey requirements of this mitigation measure. Pre-construction surveys are required in this mitigation measure and, similar to the pre-construction surveys described in MM BR-1, the information gathered from the surveys shall be used to develop site and resource specific actions. In the case of Nevin’s barberry, this would include establishing the initial buffer of 200 feet around individuals. The surveys completed previously do not meet the requirements of pre-construction surveys described in the Draft EIR. No changes to the survey requirements were made.

SCE states that a “biologist” is too general of a term and that a botanist should be used to identify species and determine impacts. Because protocol level surveys are not required by this mitigation measure, the CPUC would review and approve the surveying biologist to make sure that the biologist doing the surveys have expertise with rare plants in southern California, a more specific title of botanist is not necessary.

SCE states that the known Nevin’s barberry is within 15 feet of the existing and maintained access road and claims that the buffer requirements listed in MM BR-6 would result in more impacts because with the smallest buffer—25 feet—a new road would need to be constructed to access the site and this road would be in nesting habitat for least Bell’s vireo and coastal California gnatcatcher. The distance of 25 feet in the measure was intended to provide SCE the flexibility to continue to utilize the access road if SCE can do so without impacting Nevin’s barberry and if the reduced buffer is approved by the CPUC after coordination with USFWS. The following changes to the mitigation measure were made based on SCE’s comment to clarify survey requirements and correct the distance from the access road to the known Nevin’s barberry.

Pages ES-9, 4.3-61, and 8-13:

The project shall be designed to avoid impacts on occurrences of Nevin’s barberry during construction and operation and maintenance. Prior to the start of construction, the applicant’s CPUC-approved qualified biologist shall complete pre-construction surveys in suitable habitat ~~during the appropriate blooming period~~ to identify any occurrences. Where Nevin’s barberry occurs, all construction and operation and maintenance activities shall occur outside a restrictive buffer, which shall be established by a CPUC-approved qualified biologist. Vehicles and crew members shall be prohibited from coming within 200 feet of identified Nevin’s barberry unless a buffer reduction is approved by the CPUC after ~~consultation~~coordination with USFWS. A reduced buffer shall be a minimum of ~~approximately 15-25 feet or greater~~ from a Nevin’s barberry plant. A qualified biologist approved by the CPUC shall monitor crew members and the Nevin’s

barberry to ensure all project activities stay away from Nevin's barberry within the buffer.

D2-95 Southern California black walnut is considered a special-status plant in the Draft EIR. SCE asserts that the same mitigation measures should apply to all special-status plants (with the exception of Nevin's barberry) and that MM BR-7 and MM BR-8 are potentially conflicting. SCE states that MM BR-7 implies surveys only for known individuals would occur whereas MM BR-8 requires surveys to identify new individuals.

MM BR-7 requires an "evaluation survey" by a qualified arborist for all black walnut trees within 25 feet of construction activities; in order to meet this requirement, SCE must evaluate previously known trees and trees discovered during pre-construction surveys. As stated in the measure, the arborist would record a brief description of each tree (e.g., location, height, diameter at breast height, condition). These "evaluation surveys" do not conflict with the requirement of a pre-construction survey described in MM BR-8.

SCE also claims that the mitigation measures are conflicting because MM BR-8 includes the purchase of credits and MM BR-7 does not. SCE would prefer that MM BR-7 includes the option of mitigating through the purchase of offsite credits in order to have the flexibility to avoid planting trees under powerlines. MM BR-7 was modified to incorporate SCE's request as shown below.

SCE identifies an inconsistency in the ratio for Southern California black walnut mitigation in the Draft EIR. The mitigation ratio described in MM BR-7 contained a typographical error and has been corrected.

Because Southern California black walnut occur in habitat that is used for foraging by loggerhead shrike, a CDFW species of special concern, and nesting and foraging by coastal California gnatcatcher, a federally endangered species, USFWS and CDFW should be included in mitigation decisions regarding replacement of trees.

Changes to MM BR-7 were made as follows:

Pages ES-9, 4.3-61, 8-14:

MM BR-7: Restoration of Southern California Black Walnut. SCE shall take measures to avoid and minimize impacts on Southern California black walnut resulting from project construction activities, and shall plant replacement trees for any impacted or removed specimens. Prior to construction (after completion of final engineering design of project features), black walnut tree evaluation surveys shall be completed by a qualified arborist (an arborist with extensive local or regional expertise in the planting, care, and maintenance of black walnut trees). The arborist must be approved by the CPUC. The arborist shall record a brief description (e.g., location, height, diameter at breast height, condition) of each black walnut tree with a dripline within 25 feet of construction activities. All construction activities that take place within the driplines of black walnut trees (i.e., the outermost extent of the canopy) that are not being intentionally removed

shall be monitored by a qualified arborist to reduce, to the extent feasible, impacts on the tree, including roots.

California black walnut trees that are impacted within the drip line or intentionally removed shall be replaced at a 23:1 ratio. If the diameter at breast height of the tree to be removed is 24 inches or less, it shall be replaced with a 24-inch box tree. If the diameter at breast height of the tree to be removed is greater than 24 inches, it shall be replaced with a 36-inch box tree. Replacement trees shall be planted on site as near to the original location as feasible and biologically appropriate, and shall be monitored by a qualified arborist who will ensure the replacement trees are placed in a suitable area. Replacement trees shall be monitored for seven years after the initial planting or until the arborist determines that 80 percent of trees are successfully established. If onsite replacement is not feasible, SCE shall plant replacement trees offsite as near to the proposed project as is appropriate and feasible. The same monitoring requirements and success criteria would apply as for those trees planted onsite. If neither of the two options above are feasible, SCE shall purchase credits and/or mitigation lands from an entity approved by CDFW such that a restoration ratio of 4:1 is achieved.

Tree removal shall not be permitted until a detailed plan for restoration, including identification of planting location, or offsite mitigation lands, is approved by the CPUC, and in consultation with USFWS and CDFW. Replacement trees shall be planted before tree removal, or if not feasible or if potentially harmful to the replacement trees, as soon as possible after removal.

Changes to MM BR-8 to clarify requirements related to Southern California black walnut were made as follows:

Pages ES-9, 4.3-62 , and 8-14:

Special-status plants shall be identified by a qualified biologist and flagged or surrounded with fencing in such a way that disturbance of the populations or individuals shall be avoided. In the event that populations or individuals of special-status plants (other than Southern California black walnut—see MM BR-7) cannot be avoided, the applicant shall develop and implement a restoration plan for each plant which will be submitted to CPUC and CDFW for review and comment no less than 60 days prior to construction activities within the work area where impacts would occur. The CPUC will coordinate with and CDFW, and CPUC approval is required before the plan is implemented. In the case of Southern California black walnut trees, a restoration plan will be completed and approved as described in MM BR-7.

- D2-96 As requested by SCE, changes have been made to allow mitigation of impacts to Southern California black walnut trees through the purchase of offsite mitigation lands. Refer to the response to comment D2-95 for specific changes.
- D2-97 As presented in SCE's comment, changes have been made to correct the inconsistency between the impact analysis and MM BR-7. Refer to the response to comment D2-95 for specific changes.

D2-98 As stated by SCE, CDFW and USFWS do not have jurisdiction over Southern California black walnut trees, unless associated with a jurisdictional drainage. However, as discussed in the Draft EIR, because Southern California black walnut trees occur in habitat that is used for foraging by loggerhead shrike, a CDFW species of special concern, and nesting and foraging for coastal California gnatcatcher, a federally endangered species, USFWS and CDFW should be consulted regarding mitigation of walnut trees. The changes recommended in this comment were not incorporated into the EIR.

D2-99 The Nesting Bird Management Plan (NBMP) described in MM BR-11 is intended to contain information regarding how SCE plans to reduce impacts to less than significant on nesting birds, including those listed under the federal or state endangered species acts as well as those covered under Migratory Bird Treaty Act or the California Fish and Game Code (described under Impact BIO-1 of the Draft EIR). The applicant is independently required to comply with the federal and state endangered species acts. Specific biological resource mitigation measure requirements in this EIR may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in this EIR. Permit conditions and other measures required to comply with the endangered species acts could be referenced or included in the NBMP as appropriate. Similar to the recently approved NBMP for the Santa Barbara County Reliability Project, the CPUC would like the Mesa NBMP to contain all birds that have the potential to occur on site in order to have a comprehensive document for biologists and monitors to utilize. One comprehensive document would decrease confusion that could occur due to the different requirements for the various bird species.

The revisions recommended in this comment were not incorporated into the EIR.

D2-100 SCE asserts that restating established protocol in their NBMP is not necessary when species-specific protocol is available. The following revision was made to clarify that SCE would be required to describe how it will comply with existing protocol instead of simply restating the protocol requirements.

Pages ES-10, 4.3-63, and 8-15:

Appropriate survey timing, extents, methods, and surveyor qualifications; approved nest deterrent methods, including areas where vegetation will be cleared for the purpose of deterring nesting; monitoring and reporting protocols during construction; protocol for determining whether a nest is active; protocol for documenting, reporting, and protecting active nests within construction areas. If pre-construction survey protocols exist for a certain species, the plan shall identify the species-specific protocol that will be followed and outline how SCE will comply with the protocol~~outline the implementation of these protocols.~~

D2-101 In response to SCE's comment D2-77, the term "raptor" was removed from the buffer reduction discussion in MM BR-11. During coordination for the preparation of the NBMP, the CPUC will discuss the buffer reduction process for raptors with the USFWS and CDFW.

Pages ES-10, 4.3-63, and 8-15:

Guidelines for determining appropriate and effective buffer distances that will account for specific project settings, bird species, stage of nesting cycle, and construction work type. Language for buffer reduction process will be included in the plan, which shall include coordination with the appropriate wildlife agencies and the CPUC if reducing the buffer of a raptor or special-status species.

- D2-102 SCE refers to a technical working group convened for the West of Devers Project, which resulted in a template NBMP that SCE would like to use for this project. The template plan included requirements for previous experience but not education of the monitors and biologists. MM BR-11 does not specify what the minimum level of education or experience would need to be; only that the NBMP would describe the specific requirements for education and experience. The mitigation measure requires SCE to develop this plan with input from USFWS and CDFW, and obtain approval from the CPUC. SCE would be able to suggest the experience requirement agreed upon in the template. Therefore, no revision to the mitigation measure is necessary.
- D2-103 As stated by SCE, the USFWS is the authority providing approval for "take" permits. However, the CPUC, as the lead agency, will also provide approval for construction activities and the CPUC will coordinate with the USFWS to make decisions that may impact the coastal California gnatcatcher. Consistent with the recommendations in this comment, the following changes were made to clarify agency consultation requirements in MM BR-12.

Pages ES-11, 4.3-64, and 8-16:

In the event that coastal California gnatcatchers are observed during pre-construction surveys, a qualified biologist must identify the boundaries of the pair's territory and SCE must not conduct construction activities within 500 feet of the territory, or as otherwise approved by the CPUC, in consultation with USFWS and CDFW. SCE shall notify USFWS and CDFW ~~and the CPUC~~ in the event gnatcatcher territory or nest sites are confirmed by surveys, immediately upon return from the field. If infeasible to maintain a buffer of 500 feet (or a distance otherwise approved by USFWS and CDFW), by installing temporary flagging or fencing, from an active gnatcatcher territory, construction activities within or near these areas will be performed outside the breeding and nesting season (coastal California gnatcatcher breeding/nesting season is approximately February 1 through August 30).

- D2-104 Additional information was added to clarify that the timing of pre-construction, protocol level surveys for least Bell's vireo would occur within the survey window specified in USFWS protocol for the species. SCE also suggests providing specific location information where surveys would be conducted and claims the current description is subjective. SCE recommends changing "areas of suitable or potentially suitable habitat" to "native riparian." USFWS's Least Bell's Vireo Survey Guidelines do not restrict surveys to "native riparian habitat;" guidelines state that "all riparian areas and any other potential vireo habitats" should be surveyed (USFWS 1997). Therefore, SCE's suggested change was not made; however, the term "riparian" was added to

provide more specificity regarding survey requirements.

Pages ES-11, 4.3-65, and 8-16:

MM BR-13: Pre-Construction Surveys for Least Bell's Vireo. Prior to construction and within their breeding season (generally April 10-August 31), SCE shall complete protocol-level surveys for least Bell's vireo in areas of suitable or potentially suitable riparian and other habitat within the proposed component areas. Surveys will be conducted by a qualified biologist approved by the CPUC according to the survey protocol for least Bell's vireo (USFWS 2001).

- D2-105 SCE suggested adding a defined timeframe for notifying agencies in the event least Bell's vireo territory or nest sites are confirmed. SCE recommends including a 48-hour window for notification. Given that pre-construction surveys may be completed shortly before the start of construction, agencies should be notified as soon as possible to avoid impacts. SCE does not provide information about why it suggests a 48-hour window or state that a shorter window is not feasible. To allow more time for notification, a 24-hour window after biologists return from the field was added.

Pages ES-11 4.3-65, and 8-16:

In the event that least Bell's vireo territory or nest sites are confirmed, SCE shall notify the USFWS and CDFW ~~immediately upon~~ within 24 hours of returning from the field. If individuals or their nests are observed, biologists will establish and maintain a minimum 500-foot (or a distance otherwise approved buffer from USFWS and CDFW) exclusionary buffer by installing temporary flagging or fencing between the nest territory and construction activities.

- D2-106 SCE claims that MM BR-14 may conflict with the project description, which requires removal of riparian vegetation.

The mitigation measure does not prevent the removal of riparian vegetation where it is needed. The mitigation measure provides a mechanism to minimize the removal of riparian vegetation in areas that require vegetation removal; thus, there is no conflict with the project description. SCE's statement that it would "minimize impacts to areas where riparian vegetation does not need to be removed" is noted. Because SCE does not identify an issue with the environmental analysis, no further response can be provided.

- D2-107 MM BR-15 is intended to reduce impacts from avian collision with power lines during operations of the proposed project. SCE provided a company-wide Avian Protection Plan (APP) that describes a general approach to bird management during construction and operations of projects. The plan briefly describes that Avian Power Line Interaction Committee (APLIC) standards will be incorporated, but does not specify what measures would be utilized or how. The APP in the mitigation measure is required to describe the provisions SCE will incorporate from APLIC's standards into the operation of the Mesa Substation and a system for adaptive management of project-related issues to ensure impacts would be less than significant. This information is not provided in detail in SCE's company-wide APP. Therefore, it would

not necessarily meet the requirements of mitigation measures or reduce impacts from collision to less than significant. Therefore, no changes to the EIR have been made.

D2-108 The following revision has been made to correct the noted typographical error.

Page 4.4-1:

Cultural resources discussed in this section include historical resources, archeological resources (which may be historic or prehistoric and are a subset of historical resources), Native American resources, and paleontological resources:

D2-109 The following revision has been made to correct the noted typographical error.

Page 4.4-1:

- **Historical Resources:** The California Environmental Quality Act (CEQA) defines historical resources as resources that are listed on, or determined to be eligible for listing on, the California Register of Historical Resources (CRHR) or a local register, or are otherwise determined to be historical pursuant to CEQA or the CEQA Guidelines (Public Resources Code [PRC] § 21084.1 or Code of Regulations, Title 14, § 15064.5, respectively). According to the CEQA Guidelines, a historical resource may be an object, building, structure, site, area, place, record, or manuscript that a ~~L~~ead ~~a~~Agency determines to be historically significant or significant in terms of California’s architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural records. Typically, in order to be considered historical for purposes of listing, a resource must be at least 50 years old.

D2-110 The following revision has been made to correct the noted typographical error.

Page 4.4-1:

- **Archaeological Resources:** Archaeological resources may be considered historical resources pursuant to the CEQA Guidelines. Archaeological resources may also be determined to be “unique” as defined by CEQA (PRC § 21083.2). Unique archaeological resources are artifacts, objects, or sites that can be demonstrated to (1) contain information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) have a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) be directly associated with a scientifically recognized important prehistoric or historic event or person. Archaeological resources that are neither a unique archaeological nor an historical resource are not required to be addressed in an Environmental Impact Report (EIR).

D2-111 The following revision has been made to correct the noted typographical error.

Page 4.4-6:

To determine the potential for built environment historical resources, ASM reviewed current and historic aerial photographs of the substation site. Subsequently, ASM conducted a historical resource field survey of the Mesa Substation area on August 19, 2014. ASM took photographs to document the three buildings located at 440 Potrero Grande Avenue. ASM also conducted archival research at the Monterey Park Public Library, including the Special Collections Room, and the City of Los Angeles Public Library to evaluate the buildings located in aerial imagery on the Mesa Substation site (Williams et al. 2014).

D2-112 The following revision has been made to correct the noted typographical error.

Page 4.4-7:

The majority of the Goodrich Substation site (Figure 2-3e), which includes the project construction area and Staging Yard 4, was surveyed for archaeological resources for the TRTP project in 10-meter-wide transects. A small portion of the north central part of the Goodrich Substation site had not been surveyed. ASM surveyed this area to an intensive level for archaeological resources using 10-meter transects on June 19, 2014. No architectural historical resources survey was conducted because no potential built environment historical resources were identified in examination of aerial photographs of the Goodrich Substation area (Williams et al. 2014).

D2-113 The following revision has been made to correct the noted typographical error.

Page 4.4-10:

Three additional historic era resources were newly identified during field surveys of the Mesa Substation site area for the proposed project. These historic era resources include three buildings located at 440 Potrero Grande Drive that were constructed more than 45 years ago. The buildings' plans, architectural features, conditions, and historical integrity were noted, and California Department of Parks and Recreation (DPR) 523 site records were prepared to document the survey. None of the buildings were recommended as eligible for listing on CRHR or the NRHP (Williams et al. 2014) and the CPUC has no evidence to conclude that they are otherwise considered historical resources under CEQA.

D2-114 The following revision has been made to correct the noted typographical error.

Page 4.4-11:

CRHR California Register of Historical Resources

D2-115 The following revision has been made to correct the noted typographical error.

Page 4.4-12:

CRHR California Register of Historical Resources

D2-116 The following revision has been made to correct the noted typographical error.

Page 4.4-13

CRHR California Register of Historical Resources

D2-117 The following revision has been made to correct the noted typographical error.

Page 4.4-13:

The proposed project would require equipment replacements and upgrades within the perimeters of several existing substations³ in addition to the Mesa and Goodrich Substations. The applicant conducted a review of each of these substations and assessed whether they had been evaluated for NRHP/CRHR eligibility (Williams 2014). Additionally, Historical Resource Analysis Reports/Historic Property Survey Reports were prepared to evaluate NRHP/CRHR eligibility for the Laguna Bell and Lighthipe Substation Properties (Chiang and Tinsley Becker 2014a); the Repetto and San Gabriel Substation Properties (DeBiase and Tinsley Becker 2015); and the Anita, Fairfax, Garfield, and Newmark Substation Properties (Tinsley Becker et al. 2015). The Amador, Hillgen, Industry, and Jose Substations have not been evaluated. Table 4.4-4 lists each substation property where equipment replacements and/or upgrades would occur and its NRHP/CRHR eligibility status. The Mira Loma Substation is not of sufficient age to be eligible for the NRHP or CRHR.

D2-118 The following revision has been made to correct the noted typographical error:

Page 4.4-14:

CRHR California Register of Historical Resources

D2-119 CPUC reviewed supplemental information requested from SCE, which included an email from Walter Davis from the USACE stating that the action would not require a permit under Section 408.

The following revision has been made to the EIR:

Page 4.4-19

Section 106 of the NHPA is the basis for determining significance of impacts to cultural resources for projects with a federal nexus. Sections of the proposed project likely would not require a permit from the United States Army Corps of Engineers under Section 408 of the Rivers and Harbors Act and Section 404 of the

Clean Water Act (see also section 4.3, "Biological Resources") for potential impacts to Waters of the United States.

D2-120 The following revision has been made to correct the noted typographical error:

Page 4.4-20:

The CRHR is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (California PRC § 5024.1(a)).

D2-121 The following revision has been made to correct the noted typographical error and reflect that the absence of resources in this area supports the conclusion that there would be no impact to known historical resources.

Page 4.4-26:

No historic or archeological sites were identified during a record search or pedestrian surveys at the proposed project area for proposed transmission structure replacement in the City of Commerce or at the proposed conversion of the street light conductors from overhead to underground within the City of Bell Gardens. Therefore, there would be no impacts related from construction of the transmission structure or conversion ~~conversation~~ of the street light conductors ~~would be less than significant under this criterion.~~

D2-122 The following revision has been made to correct the noted typographical error.

Page 4.4-26:

Routine operations and maintenance activities would not require ground disturbing activities. However, maintenance of access roads may include occasional removal of vegetation or other activities to address washouts or eroded areas, as needed. In addition, wood pole testing and treating is a necessary maintenance activity conducted to evaluate the condition of wood structures both above and below ground level. Intrusive inspections require the temporary removal of soil around the base of the pole, usually to a depth of approximately 12 to 18 inches, to check for signs of deterioration. These would require ground disturbing activities in previously disturbed areas of the proposed project and would not result in material or physical changes to the known eligible and listed resources or to undiscovered resources. Therefore, there would be no potential to directly or indirectly impact a historical resource. Therefore, operations and maintenance-related activities would have no impact under this criterion.

D2-123 The following revision was made to clarify that damage to a resource that is historical would be a significant impact.

Page 4.4-27:

The remainder of activities would not result in ground disturbance and would not have the potential of damaging an undiscovered resource unless it was on the ground surface. Damage to a previously undiscovered historical surface resource would be a significant impact. MM CR-3 would be implemented to protect previously undiscovered resources. Impacts would be less than significant with mitigation.

D2-124 The following revision was made to clarify that damage to a resource that is historical would be a significant impact.

Page 4.4-28:

These would require ground disturbing activities in previously disturbed areas of the proposed project. Therefore, there would be no potential to directly or indirectly impact an undiscovered historical or archaeological resource.

D2-125 Refer to response to comment D2-1.

D2-126 Refer to response to comment D2-2.

D2-127 Refer to response to comment D2-3.

D2-128 Refer to response to comment D2-4.

D2-129 Refer to response to comment D2-5.

D2-130 Refer to response to comment D2-6.

D2-131 Refer to responses to comments D2-7 and D2-8.

D2-132 Refer to response to comment D2-9.

D2-133 Refer to response to comment D2-10.

D2-134 The following edit was made to complete the Section 402 General Construction Activity NPDES Permit description.

Page 4.5-19:

As authorized by Section 402 of the Clean Water Act, the California State Water Resources Control Board administers the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (General Construction Activity NPDES Storm Water Permit, 2009-0009-DWQ, 2010-0014-DWQ, and 2012-0006-DWQ) that covers a variety of construction activities that could result in

wastewater discharges. Under this General Permit, the state issues a construction permit for projects that disturb ~~more than~~ 1 acre or more of land.

- D2-135 The following revision was made to clarify that EPA is responsible for the Final GHG Tailoring Rule.

Page 4.6-6:

The EPA's Final GHG Tailoring Rule, established in May 2010, sets thresholds for GHG emissions that define when permits under the New Source Review, Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule tailors the requirements of these Clean Air Act permitting programs to limit which facilities are required to obtain PSD and Title V permits. Thresholds to trigger PSD and Title V are currently set at 100,000 tons per year of CO₂e. A June 23, 2014 U.S. Supreme Court decision held that EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit.

- D2-136 The commenter's requested revision is noted and included in the record for consideration of decision makers. SCE correctly notes that low carbon fuel standard (LCFS) was identified by CARB under the AB 32 Scoping Plan. The LCFS regulation was originally approved by CARB in 2009 and re-adopted in 2015. Executive Order S-1-07, issued on January 18, 2007, and which also addressed LCFS, calls for a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. No changes were made to the text as a result of the comment.

- D2-137 The following language was added to the description of Resource Conservation and Recovery Act-regulated hazardous waste.

Page 4.7-16:

A RCRA-regulated hazardous waste is either found on a predetermined list or is not on a list, but exhibits at least one of four characteristics: ignitability, corrosivity, reactivity, or toxicity. To keep track of hazardous waste activities, facility owners and operators who generate, transport, treat, store, or dispose of hazardous wastes must maintain records and submit reports to the EPA at regular intervals.

- D2-138 The following change has been made to the description of wood pole disposal site based on updated information provided by SCE.

Page 4.7-25:

These poles would need to be reused, returned to the manufacturer, or disposed of in a Class I hazardous waste landfill, disposed of in the lined portion of a Regional Water Quality Control Board (RWQCB) certified municipal landfill, or returned to the manufacturer. It is anticipated that these poles would either be reused or disposed of through SCE's Treated Wood Waste contractor, Waste Management, Inc. at El Sobrante Landfill at Savage Canyon Landfill, the only landfill identified by

~~the applicant for the proposed project that can accept treated wood waste (CalRecycle 2016, SCE 2015b) as discussed further in Section 4.12, "Public Services and Utilities."~~

D2-139 The following change has been made regarding the citation of California's Health and Safety Code.

Page 4.7-33:

Because additional oil would be brought to and stored at the proposed Mesa Substation as part of the proposed project, the applicant would be required to update this plan to accommodate the additional oil-filled equipment in accordance with the CWA and APSA. An HMMP would also be required pursuant to California HSC Section ~~25505.25503.5~~. The HMMP would include safety information regarding the transport, use, and disposal of hazardous materials.

D2-140 The applicant is required to comply with applicable laws, including California laws regulating hazardous materials. However, CEQA does not prohibit including compliance with a law as a mitigation measure. Furthermore, MM HZ-1 requires that SCE submit a copy of the Hazardous Materials Business Plan to the CPUC so that the CPUC can ensure mitigation of impacts. Therefore, MM HZ-1 has been retained.

D2-141 The applicant is required to comply with applicable laws, including California laws regulating hazardous materials. However, compliance with an applicable law or obtaining a permit does not necessarily mitigate all impacts or eliminate the need for mitigation measures. As described in Section 4.7.2.1, Spill Prevention, Control, and Countermeasure plans are required to address oil spills, and the statutory requirement is applied to reduce impacts during project operation. However, under Impact HZ-1, MM HZ-3 is applied to also address construction activities that could result in a spill and requires SCE to submit the plan to the CPUC for review and approval at least 30 days prior to construction.

D2-142 The applicant is required to comply with the federal CWA. However, CEQA does not prohibit including compliance with a law as a mitigation measure. Furthermore, MM HY-1 requires that SCE implement specific Best Management Practices (BMPs) to reduce specific impacts. SCE must also submit a copy of the SWPPP to the CPUC so that CPUC can ensure mitigation of impacts. Therefore, MM HY-1 has been retained.

D2-143 The suggested revision was not made because MM HZ-1, MM HZ-3, and MM HY-1 were retained in the Final EIR. Refer to responses to comments D2-140, D2-141, and D2-142.

D2-144 The suggested revision was not made because MM HZ-3 was retained in the Final EIR. Refer to response to comment D2-141.

D2-145 SCE states that the EIR analysis should state that SCE would prepare a Contaminated Soil Contingency Plan (CSCP) in compliance with regulatory requirements described in the state regulatory setting in Section 4.7.2.2. There are no regulations listed in Section 4.7.2.2 that require preparation of a CSCP; rather, MM HZ-4 requires that the CSCP be

prepared consistent with practices implemented under California Title 8 and Cal-OSHA regulations. Furthermore, MM HZ-4 requires that SCE prepare a CSCP that outlines steps that would need to be taken to identify and deal with contaminated soil in order to ensure implementation of the mitigation. SCE must also submit a copy of the CSCP to the CPUC so that CPUC can ensure mitigation of impacts. Therefore, MM HZ-4 has been retained.

- D2-146 The applicant is required to comply with applicable laws including California laws regulating Waste Discharge Requirements (WDRs) and discharge of extracted groundwater. However, CEQA does not prohibit including compliance with a law as a mitigation measure. Furthermore, MM HY-2 outlines options for disposal of groundwater allowed in the case that there is no WDR for the activity. Therefore, MM HY-2 has been retained.
- D2-147 The suggested revision was not made because MM HZ-4 was retained in the Final EIR. Refer to the response to comment D2-145.
- D2-148 The suggested revision was not made because MM HZ-4 was retained in the Final EIR. Refer to the response to comment D2-145. However, the following correction to the title of the plan described in this section was made.

Page 4.7-37:

This could create a hazard to the public or environment, which would be a significant environmental effect. The applicant would prepare and implement a Contaminated Soil Contingency Management Plan in accordance with MM HZ-4, which would include precautionary measures and methods for handling potentially contaminated soils at all site areas that involve excavation activities.

- D2-149 MM HZ-1 was not removed per SCE's request; refer to the response to comment D2-140. SCE provided an alternative request in the event the mitigation measure was not removed. The following change was made as requested by SCE; however, a 15-day time-frame was added to the CPUC submittal requirement to allow adequate time for verification.

Page 4.7-39:

A Hazardous Materials Business Plan (HMBP) shall be submitted to the CPUC and electronically through the California Environmental Reporting System (CERS) for any hazardous materials stored on-site over threshold quantities (55 gallons, 200 cubic feet, or 500 pounds). The plan shall include information on:

- Hazardous materials stored at the Mesa Substation over threshold quantities.
- A site map with key emergency information, including internal access roads, adjacent public streets, sewer drains, emergency response equipment, and access/egress points.
- Emergency response plans for release and threatened release of the covered materials.

The HMBP and its approval by the Los Angeles Certified Unified Program Agency must be submitted to the CPUC at least 30 days prior to storage of covered hazardous materials. The HMBP must be submitted at least 30 days prior to storage of covered hazardous materials via the CERS. A receipt, showing that the agency received the plan, must be submitted to the CPUC no less than 15 days prior to storage of covered hazardous materials.

- D2-150 As explained in the response to comment D2-141, MM HZ-2 was not removed from the EIR and no revisions were made to MM HZ-2.
- D2-151 MM HZ-3 was not removed per SCE's request; refer to the response to comment D2-141. SCE provided an alternative revision in the event the mitigation measure was not removed, but the CPUC will not make the requested revisions because the revisions would take away the CPUC's ability to review and approve the Spill Prevention, Control, and Countermeasure plan. SCE's suggested revision to the time frame required to submit the plan makes it less effective because the plan can be submitted after construction has already begun. Thus, no revisions were made to the mitigation measure.
- D2-152 The following typographical error was corrected.

Page 4.8-5:

SCE has performed wetland delineations on the Mesa Substation site per United States Army Corps of Engineers' (USACE's) *Wetlands Delineation Manual* and the *Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region*. Figure 4.8-23 shows the result of delineations. SCE submitted a request for an Approved Jurisdictional Determination on April 23, 2015 for waters on the Mesa Substation site. SCE has not yet received approval from USACE (SCE 2015).

- D2-153 Refer to response to comment D1-45.
- D2-154 The following changes have been made regarding the distance of Legg Lake relative to proposed project components.

Page 4.8-6:

Under section 303(d) of the Clean Water Act, states identify water bodies as impaired for certain pollutants. The only listed water body in the vicinity of the project area is Legg Lake, which is located 0.2 mile ~~southwest~~^{northeast} of Staging Area 7 and about ~~0.1-0.2~~ mile north of Telecommunications Route 3. The proposed Mesa Substation site area is located approximately 2.5 miles northeast of the lake.

- D2-155 The typographical error identified in this comment has been corrected. See response to comment D1-45 for revisions.

D2-156 The following change has been made to the description of Section 402 permitting based on input by SCE.

Page 4.8-12:

As authorized by Section 402 of the CWA, the SWRCB administers the statewide National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) (NPDES Permit, 2009-0009-DWQ ~~as amended by~~ and 2010-0014-DWQ ~~and 2012-0006-DWQ~~) ~~that~~which covers a variety of construction activities that could result in wastewater discharges. Under this system, the state grants coverage under the Construction General Permit for projects that disturb ~~more than~~ one acre or more of land. The SWRCB Construction General Permit process involves the notification of the construction activity by providing a Notice of Intent to the SWRCB, the development of a Storm~~w~~ Water Pollution Prevention Plan (SWPPP), and the implementation of water quality monitoring activities if needed.

D2-157 The following changes have been made to clarify the purpose of SWPPPs.

Page 4.8-12:

- Develop a maintenance schedule for BMPs installed during construction that are designed to reduce or eliminate pollutants after construction is completed; and
- Identify a sampling and analysis strategy ~~and sampling schedule~~ for discharges from construction activity in compliance with the requirements of the Construction General Permit that discharge directly to a water body listed for impairment due to sedimentation, in accordance with CWA Section 303(d); and
- ~~Identify a sampling and analysis strategy and sampling schedule for discharges that have been discovered through visual monitoring to be potentially contaminated by pollutants not visually detectable in the runoff.~~

D2-158 Note that Section 404 is discussed in the EIR in Section 4.3.2.1. The following text related to Section 404 of the CWA has been added to the Final EIR in Section 4.8.2.1.

Page 4.8-12:

Section 404 (Waters of the United States)

Under Section 404 of the CWA, the United States Army Corps of Engineers (USACE) and EPA regulate the discharge of dredged or filled material in “waters of the United States.” Waters of the United States typically includes wetlands and permanent and intermittent drainages, creeks, and streams and all aquatic or riverine habitats between the “ordinary high water mark” of those hydrological features. Any dredge or fill in these waters typically requires a permit from the USACE pursuant to Section 404.

D2-159 The original text has been retained to explain Waste Discharge Requirements. The following changes have been made to the description of the Porter-Cologne Act to include basin plans.

Page 4.8-13:

Porter-Cologne Water Quality Control Act (Porter-Cologne Act)

Article 4 of the Porter-Cologne Water Quality Control Act (California Water Code 13260 et seq.) states that discharge of waste in an area that could affect Waters of the State requires filing a report of discharge with the Regional Water Quality Control Board. Waters of the State include surface water and groundwater in the state. Dischargers must obtain Waste Discharge Requirements (WDRs). If waters are also Waters of the U.S., then the WDR is covered by the section 401 Water Quality Certification, previously discussed. The Porter-Cologne Act (California Water Code, Division 7) regulates surface and groundwater quality in the State and requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect waters of the State. The SWRCB and local RWQCB have the responsibility of issuing permits for certain point source discharges, regulating construction and stormwater runoff, and developing regional basin plans.

Basin plans are prepared by a RWQCB to regulate all pollutants or nuisance discharges that may affect surface or groundwater within their jurisdiction. These plans designate beneficial uses for surface and groundwater, set narrative and numerical objectives that must be attained or maintained to protect designated beneficial uses, and describe implementation programs to protect all waters in the region. The Los Angeles RWQCB's Water Quality Control Plan represents the basin plan for the coastal watersheds of Ventura and Los Angeles Counties.

D2-160 A brief description of the Municipal Separate Storm Water Sewer System Permit was added to the regulatory setting in Section 4.8, "Hydrology and Water Quality," based on SCE's suggestion.

Page 4.8-14:

Municipal Separate Storm Water Sewer System Permit

The Los Angeles RWQCB's MS4 Permit, Water Quality Order No. R4-2012-0175, as amended by State Water Board Order WQ 2015-0075 (NPDES No. CAS004001) on November 8, 2012 regulates discharges within the Coastal Watersheds of Los Angeles County and 84 cities within the Los Angeles Flood Control District. Cities, including Monterey Park, Montebello, and Pasadena, are required by the permit to implement its own storm water program that prevents pollutant laden discharges from entering downstream storm water conveyance systems and draining into local receiving and coastal waters. These Cities are required to meet certain criteria thresholds, to develop and implement post-construction Low Impact Development (LID) Best Management Practices (BMPs) to address pollutant discharges.

D2-161 SCE states that it revised the water usage calculations in April 2016. SCE describes that the Central Basin Metropolitan Water District (CBMWD) is a source for recycled water and mentions that Monterey Park has taken the initiative to provide water to SCE for the proposed project. A data request was sent to SCE regarding the City of Monterey Park and CBMWD's supply of water for the project in July 2016. In response, SCE provided a copy of the letter of intent SCE sent to CBMWD, in which SCE requested a "will serve letter" from CBMWD. In its data response, SCE also submitted notes from a meeting it attended with Monterey Park and CBMWD. The information did not support SCE's assertion that Monterey Park or CBMWD *would* supply recycled water, only that SCE *requested* this supply of water and therefore *may* utilize this source of water. Because there was not confirmation from Monterey Park or CBMWD of adequate availability of water sources for the EIR analysis to rely upon, the analysis in the EIR was revised to account for the potential use and make an impact determination.

SCE also stated in the letter to CBMWD, dated March 25, 2016, that water usage estimates have increased with an average annual requirement of 202.8 acre-feet. This water usage estimate contrasts with the estimate provided in the Draft EIR comment by SCE, dated June 27, 2016, of 404 acre-feet total during construction. The more recent, higher estimate from SCE's comment letter on the Draft EIR was used to revise the EIR.

Revisions have been made to the analysis to reflect SCE's intent to utilize recycled water and new water usage estimates provided in this comment. SCE estimates that water use will consist of a maximum of 140 acre-feet per year for three years. The maximum water use in any single year remains the same as previously estimated in the Draft EIR; however, given that the maximum use may occur over an additional year, the total water use estimate has increased. As described in the EIR, 140 acre-feet is approximately 0.3 percent of the 2014–2015 overdraft, which would not cause a notable decrease in the water table. Impacts would remain less than significant.

Page 4.8-19:

Groundwater Use

The Monterey Park Department of Public Works Water Utility Division ~~may~~would supply water for construction of the proposed project. Monterey Park obtains water through contract with the Main San Gabriel Basin—a source that is entirely drawn from groundwater. The applicant intends to utilize recycled water from Central Basin Municipal Water District, thereby reducing, or eliminating, the need for groundwater; however, as of July 2016, the applicant has not secured water from the district (SCE 2016). An estimated ~~404~~279 acre-feet of water would be used throughout the 55-month duration of construction. This analysis conservatively assumes that ~~up to half of the estimated construction water, or up to 140 acre-feet per year (AFY), may be used in the first two years and last year of construction when the majority of grading activities would occur.~~

The Main San Gabriel Basin is in overdraft conditions and has experienced historic lowering of the groundwater table. The preliminary Operating Safe Yield recommendation for the Main San Gabriel Basin for fiscal year 2015–2016 is

150,000 AFY and for subsequent years through 2020 is approximately 130,000 AFY. About 195,000 acre-feet were pumped in 2014–2015. Producers pumping from the groundwater basin can pump more than their annual right, but they are required to fund water for recharging the basin; in 2014–2015, the required recharge amount would have been 45,000 acre-feet. Groundwater levels at one well have also decreased from 294 feet in 1983 to 175 feet in 2015. There is a requirement to recharge the basin to maintain the water level at this well at over 200 feet (Main San Gabriel Basin Watermaster 2015).

Even though the basin is in overdraft and groundwater levels are below the 200-foot goal, the proposed project's water use would not be a substantial use of groundwater that would result in a net deficit in aquifer volume or a lowering of the local groundwater table level. One hundred-forty AFY equates to about 0.3 percent of the 2014–2015 overdraft. Spread across the basin, this would not cause a noticeable decrease in groundwater volume or groundwater level. This pumping level would occur for a maximum of three years ~~also last only one year, with consecutive construction years using less and less water.~~ The use would therefore not be permanent. Impacts would be less than significant.

To maintain consistency throughout the EIR, the following change was also made to Section 4.12, "Public Services and Utilities:"

Page 4.12-15:

During construction, The Monterey Park Department of Public Works Water Utility Division would supply water for the proposed project. An estimated ~~404279~~ AF of water would be used throughout the 55-month duration of construction.

D2-162 The following typographical errors in the Draft EIR were corrected.

Page 4.8-21:

This would increase stormwater runoff and the potential for erosion and sedimentation because it would involve altered drainages and grade on the site. It would also increase the area of disturbed land, reducing infiltration at the site. The applicant would construct a ~~detention-retention~~ basin in the southwest corner of the proposed Mesa Substation site and would implement site and source control BMPs into the design to help mitigate surface runoff. Drainage systems would be constructed along the perimeter of the substation to direct interior runoff to the ~~detention-retention~~ basin. Impacts would be significant if the detention basin could not accommodate the amount of runoff generated, resulting in an overflow and flooding of downstream drainages.

To maintain consistency throughout the EIR, the following additional corrections were made:

Page 4.8-24:

Runoff from the substation site would be directed toward a detention basin, which would be constructed during Phase ~~12~~ (see Section 2.3.2.2, "Construction Phases").

Increases in runoff water could be significant during Phase 1, prior to construction of the detention basin.

D2-163 While SCE plans to construct the detention basin during Phase I, SCE does not indicate that the detention basin would be constructed prior to other project components that would be constructed during Phase I. Increases in runoff water could cause significant erosion during Phase I prior to detention basin construction. No revisions to the EIR were made.

D2-164 The following change to the timing of construction for the detention basin has been made based on updated information provided by SCE.

Page 4.8-20:

The applicant intends to prepare and implement a drainage plan in compliance with the jurisdictional agency requirements to minimize potential surface water and erosion impacts during the proposed site preparation and construction. Runoff from the substation site would be directed toward a detention basin, which would be constructed during Phase 1 (see Section 2.3.2.2, "Construction Phases").

D2-165 The following change to the timing of the construction for the detention basin has been made based on updated information provided by SCE.

Page 4.8-22:

Runoff from the substation site would be directed toward a detention basin, which would be constructed during Phase 1 (see Section 2.3.2.2, "Construction Phases"). Increases in runoff water could be significant during Phase 1, prior to construction of the detention basin.

D2-166 While SCE plans to construct the detention basin during Phase 1, SCE does not indicate that the detention basin would be constructed prior to other project components that would be constructed during Phase 1. Increases in runoff water could cause significant erosion during Phase 1 prior to detention basin construction. No revisions to the EIR have been made.

D2-167 The following typographical errors in the Draft EIR have been corrected.

Page 4.8-23:

It would also increase the area of disturbed land, reducing infiltration at the site and further increasing the potential for flooding. The applicant would construct a ~~detention~~retention basin in the southwest corner of the proposed Mesa Substation site and would implement site and source control BMPs into the design to help mitigate surface runoff. Drainage systems would be constructed along the perimeter of the substation to direct interior runoff to the ~~detention~~retention basin. Impacts would be significant if the detention basin could not accommodate the amount of runoff generated, resulting in an overflow and flooding of downstream drainages.

The following additional change was made to ensure consistency throughout the section:

Page 4.8-22:

Impacts would be significant if the detention basin could not accommodate the amount of runoff generated, resulting in an overflow and flooding of downstream drainages. MM HY-4 would require designing the basin to be of adequate capacity. These impacts would be less than significant with mitigation.

D2-168 While SCE plans to construct the detention basin during Phase 1, SCE does not indicate that the detention basin would be constructed prior to other project components that would be constructed during Phase 1. Increases in runoff water could cause significant erosion during Phase 1 prior to detention basin construction. No revisions to the EIR have been made.

D2-169 The following corrections have been made based on information provided by SCE.

Page 4.8-24:

After construction, there would be about 72.2 acres of permanent new disturbance at the Mesa Substation. This would increase storm water runoff because it would involve alterations in drainages and grade on the site. It would also increase the area of disturbed land, reducing infiltration at the site. The applicant would construct a ~~detention~~retention basin in the southwest corner of the proposed Mesa Substation site and would implement site and source control BMPs into the design to help mitigate surface runoff. Drainage systems would be constructed along the perimeter of the substation to direct interior runoff to the ~~detention~~retention basin. Impacts would be significant if the detention basin could not accommodate the amount of runoff generated. MM HY-4 would require designing the basin to be of adequate capacity. These impacts would be less than significant with mitigation.

D2-170 Several changes to the analysis of Impact HY-8 have been made per SCE's comment in D1-29, which pertained to the error in determining that the Main Project Area is in the inundation area for the failure of the Garvey Reservoir south dam. Refer to response to comment D1-29 for details regarding changes made in this section of the EIR.

Despite the removal of MM HY-6, the impact analysis conclusion remains "less than significant with mitigation." Staging Yard 6 is in the inundation area for the Garvey Reservoir north dam. Inundation waters would be about 5 feet deep. A dam failure when workers are present in this area could result in significant impacts due to the close proximity to the dam and depth of the water. Therefore, MM HY-5, which requires training on an evacuation route in the event of dam failure, is still necessary. With implementation of MM HY-5, Impact HY-8 is considered less than significant with mitigation. Therefore, the overall determination that Impact HY-8 would be less than significant with mitigation has not been revised.

D2-171 See response to comment D1-29 for changes made to the EIR.

D2-172 See response to comment D2-142.

D2-173 The applicant has requested several modifications to the existing language in MM HY-1 if MM HY-1 is retained. The CPUC is retaining MM HY-1, as described in response to comment D2-142.

SCE suggested removing specific examples of BMPs that could be implemented as well as the goals of implementing the BMPs. The goals of the BMPs—to “minimize ponding, eliminate flood hazards, and avoid erosion and siltation into creeks, streams, rivers, or bodies of water”—serve as a performance standard to reduce impacts to less than significant and therefore require the BMPs serve to reduce those impacts. SCE’s revisions remove those goals, which could result in BMPs that do not address all of those performance standards. No changes based on this suggestion have been made to the mitigation measure.

SCE also requests that the SWPPP be “site-specific” and “prepared in compliance with the Construction General Permit.” However, MM HY-1 already states that the “applicant will obtain coverage for the project under the Construction General Permit.” SCE’s suggestion that the SWPPP be “site-specific” is not clear because it could refer to the Mesa Substation site only or it could refer to the entire project site. Because of this, the CPUC has made none of the requested revisions.

SCE has suggested changing the requirement that vehicle maintenance activities take place at least 150 feet from aquatic resources to at least 50 feet, if feasible. The CPUC has no evidence that a minimum of 50 feet would be adequate to, for example, ensure that maintenance activities do not result in impacts to waters. The CPUC has found that 150 feet is a sufficient distance to ensure spills from maintenance activities would not impact aquatic resources. The addition of “if feasible” is unacceptable because it leaves open the possibility that impacts would be significant and unavoidable. The addition of “if feasible” without a definition of what would make implementation infeasible also makes enforcement of the mitigation measure problematic. Therefore, revisions regarding the minimum distance for vehicle maintenance have not been made based on SCE’s suggestion.

SCE suggested modifying the mitigation measure to eliminate the requirement for the applicant to provide the CPUC with approved SWPPPs at least 30 days prior to construction. However, the CPUC will need proof of coverage to ensure mitigation as part of its responsibility as the Lead Agency. Therefore, this requirement has been retained. The CPUC agrees to the change about keeping SWPPPs on site and providing to the CPUC upon request once construction has begun. The following revisions were made to MM HY-1:

Page 4.8-29:

Verification of Construction General Permit obtained from the State Water Resources Control Board coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be kept onsite during construction

and provided to the CPUC on request during construction.

- D2-174 The applicant states that it would be required to submit an “Erosion Control Plan” to the City of Monterey Park as part of the grading plan process and that construction drainage issues are managed through the SWPPP process. The City of Monterey Park has stated that because the proposed project would be getting a General Construction Permit from the State Water Resources Control Board and would develop and implement a SWPPP, no additional plan describing erosion control would be required by the City (Alfonso pers. comm. 2016). The following change has been made to enable the requirements of MM HY-3 be satisfied with the SWPPP.

Page 4.8-30:

SCE shall prepare and implement a Drainage Plan, or incorporate the requirements of this mitigation measure into the SWPPP, which that ensures runoff during construction activities at the Mesa Substation site will not exceed drainage capacity of the storm water system and other drainage facilities. Measures that can be employed can include:

- Constructing the detention basin earlier in construction.
- Constructing temporary detention basins on site.
- Creating infiltration areas to limit runoff that enters the storm water system.

If the SWPPP is not used to satisfy the conditions of this mitigation measure, SCE shall submit the plan to Monterey Park and CPUC for review and approval prior to beginning construction activities at the substation site.

- D2-175 The City of Monterey Park has stated that design of the detention basins within its jurisdiction is required to follow the standards described in the Los Angeles County Department of Public Works Hydrology Manual (Alfonso pers. comm. 2016). Therefore, SCE’s suggested revisions have not been made. Additional text has been added to clarify that the City of Monterey Park uses the same standards as Los Angeles County.

Page 4.8-30:

SCE shall design the detention basin on the proposed Mesa Substation site in accordance with the Los Angeles County Department of Public Works Hydrology Manual and in compliance with the City of Monterey Park’s requirements (LACDPW 2006). The Hydrology Manual contains techniques to calculate runoff flow rates and volumes based on Los Angeles County’s historic precipitation and runoff.

- D2-176 See response to comment D1-29 for changes made to the EIR.

D2-177 The following revisions have been made to Section 4.10.3 of the EIR to reflect that helicopters would not be used for conductor stringing at Goodrich Substation.

Page 4.10-21:

City of Pasadena

Most construction noise limitations in Pasadena apply within a 500-foot radius from a residential district; the closest residences to the substation are 100 feet away. There are residences within 500 feet of the construction area for structure replacement and telecommunications routing. Staging Yard 4 is also located within 500 feet of a residential area. ~~And may be used for helicopter landing and takeoff.~~ In this area, construction is allowed from 7:00 am to 7:00 pm Monday through Friday and from 8:00am to 5:00 pm on Saturday. Construction of the proposed project would generally take place within these hours. Some construction may be required outside of the allowed time, e.g., a planned line outage that must occur at night for safety reasons.

Page 4.10-21:

~~Helicopter use at Staging Yard 4 would produce noise levels of up to 97 dBA at 100 feet. Construction-related noise associated with the proposed project would exceed the noise limits set forth in the City of Pasadena's noise ordinance as a result of construction occurring outside of the allowed construction hours and as a result of helicopter landing activities at Staging Yard 4. This would be a significant impact. Noise reduction mitigation measures would not be effective at reducing helicopter noise within 100 feet, since the helicopters would produce noise when airborne and landing, where noise barriers would be ineffective. Impacts would be significant and unavoidable.~~

D2-178 SCE's comment is noted and the following edits have been made to the EIR.

Page 4.10-28:

Helicopters would potentially take off and land at Staging Yards 1 through 34. Helicopter use would at most produce 97 dBA at 100 feet. Estimated noise impacts to sensitive receptors near each staging yard due to helicopter landing and takeoff are provided in Table 4.10-19.

D2-179 SCE's comment is noted and the following edits have been made to page 4.10-28, Table 4.10-19, of the EIR to reflect that helicopter use would not take place at Staging Yard 4.

Table 4.10-19 Helicopter Takeoff and Landing Impacts

Staging Yard	Closest Sensitive Receptor ⁽¹⁾	Estimated Existing Noise Level at Closest Receptor	Helicopter Takeoff and Landing Impact (dBA)	Increase in dBA	Threshold (Increase in dBA)	Significant?
1	550 feet (homes on Holly Oak Drive) 50 feet (residences at Encanto Walk)	73.152 ⁽²⁾	82 103 ⁽⁵⁾	29.930	10	Yes
2	300 feet (homes on North Vail Avenue)	62 ⁽³⁾	87	25	10	Yes
3	840 feet (apartments on Neil Armstrong Street)	55 ⁽⁴⁾	79	24	10	Yes
4	170 feet (residences on Eaton Drive)	60 ⁽⁵⁾	92	32	10	Yes

Notes

(1) Closest distance to area usable for helicopter landing

(2) ~~Estimate based on measurement at 1990 Holly Oak Drive (at backyard property line facing substation). Estimate based on noise calculations along Potrero Grande Drive in the Monterey Park Market Place Supplemental EIR (Monterey Park 2011)~~

(3) Estimate based on measurement at Schurr High School at Appian Way

(4) Estimate based on measurement at Neil Armstrong Street, East of Building W

(5) ~~Estimate based on general noise levels expected in noisier suburban daytime environment, given close proximity to Interstate 210. Assuming attenuation of noise of 6 dBA with every doubling of distance, noise levels would be approximately 103 dBA at 50 feet.~~

Key:

dBA A-weighted decibels

D2-180 The commenter suggests various changes to MM NV-1, which requires a noise plan and describes performance standards to be met and noise control measures to be implemented. Suggested changes include deleting the first two bullet points which describe the mitigation’s construction standards regarding noise, modifying the list of noise control measures, and replacing monitoring requirements with modeling criteria.

SCE is incorrect when it states that the standard in the first bullet—to reduce noise by 10 A-weighted decibels (dBA)—applies to operations and is not applicable to construction noise. As described under Impact NV-4, under “Significance Threshold,” “a substantial increase in noise is defined as a 10-dBA increase of existing ambient noise levels. An increase of 10 dBA is perceived as a doubling of noise.” The Draft EIR does not assign the 10-dBA threshold only to operational noise. Therefore, the first bullet in MM NV-1 has been retained.

SCE recommends removing the second bullet—which requires implementing measures so that construction noise does not exceed the noise level specified in the jurisdiction’s noise ordinance—because it is not achievable. The CPUC agrees it is not achievable, as evidenced by the CPUC’s conclusion that impacts under Impact NV-1 (noise levels in excess of standards established in the local general plan or noise ordinance) would be significant even with mitigation. Under CEQA, CPUC is still

required to mitigate significant impacts to either less than significant or as much as feasible if the impact remains significant. MM NV-1 has been revised as reflected below.

It should be noted that the CPUC must retain a performance standard in MM NV-1. CEQA requires mitigation measures that specify the creation of a plan with specific mitigation measures that must include, among other things, a performance standard. The first two bullet points in MM NV-1 contain the standards construction noise is meant to achieve. SCE suggests including “noise reduction” as a performance standard; however, “noise reduction” in general does not indicate a goal for how much noise must be reduced. Therefore, the two bullets have been retained as a performance standard. Furthermore, these types of measures must also contain examples of specific mitigation that would be used in order to achieve the performance standard. SCE has revised MM NV-1 to state the Noise Control Plan would “consider” certain measures. The CPUC understands these measures may not be used and that they are just examples of measures that could be used. The CPUC has modified language to show that these are examples of measures that may be used rather than measures that must be used.

SCE requests the remainder of its revisions for “greater flexibility,” but does not provide specific reasons for its suggested changes. Some revisions appear to be only editorial (e.g., changing “shall” to “will”). However, many suggested revisions (e.g., “efforts will be made”) would result in an ineffective mitigation measure. SCE also deleted certain measures; the measures should be included in MM NV-1 to show the suite of measures that would be considered to reduce impacts. The following edits have been made and they provide flexibility but do not reduce the effectiveness of the mitigation measure.

Page 4.10-32:

MM NV-1: Noise Control Plan. Prior to the start of construction, the applicant shall prepare a Noise Control Plan to ensure that project construction noise does not:

- Increase ambient noise levels by more than 10 dBA (8-hour L_{eq}), or
- Exceed the noise level specified in the applicable jurisdiction’s noise ordinance.

The Noise Control Plan measures shall be selected based on the specific equipment used, and activity conducted in specific locations, and proximity to sensitive noise receptors once known. The applicant shall submit the Noise Control Plan to the CPUC at least 30 days prior to the start of construction for review and approval. Measures that may be included in the Noise Control Plan to reduce noise levels by 10 dBA or to the noise level specified in the applicable jurisdiction’s noise ordinance are: ~~shall include, but not be limited to, the following noise reduction and control measures:~~

- Temporarily and safely install and maintain ~~an~~ absorptive noise control barriers in the perimeter of construction sites and/or between stationary construction equipment and sensitive noise receptors when located within 200

feet of noise-intensive equipment operating more than 4 hours a day. The applicant shall notify all residents located within 50 feet of the absorptive barriers ~~and ensure such barriers are installed in a safely manner.~~

- Limit heavy equipment activity adjacent to residences or other sensitive receptors to the shortest possible period required to complete the work activity.
- Ensure that proper mufflers, intake silencers, and other noise reduction equipment are in place and in good working condition.
- Maintain construction equipment according to manufacturer recommendations.
- Minimize unnecessary construction equipment idling.
- Reduce noise from back-up alarms (alarms that signal vehicle travel in reverse) in construction vehicles and equipment by providing a layout of construction sites that minimizes the need for back-up alarms and use flagmen to minimize the time needed to back up vehicles.
- When possible, use construction equipment specifically designed for low noise emissions (~~e.g., i.e.,~~ equipment that is powered by electric or natural gas engines instead of diesel or gasoline reciprocating engines). ~~Electric engines have been reported to have lower noise levels than internal combustion engines.~~
- Where practical, locate stationary equipment such as compressors, generators, and welding machines away from sensitive receptors or behind barriers.

The Noise Control Plan shall detail the frequency, location, and methodology for noise modeling and monitoring prior to and during various construction and restoration activities to ensure that generated noise levels do not exceed 10 dBA above existing ambient noise levels, or the applicable jurisdiction noise standards. These methods shall include monitoring noise levels at the boundary of construction areas and using industry-standard noise modeling techniques to predict noise levels at adjacent sensitive receptors. If modeled levels exceed the greater than 10 dBA above existing ambient noise or applicable ordinance threshold noise, monitoring will be conducted to verify model results. The Noise Control Plan shall detail the actions and procedures that the applicant shall implement to mitigate impacts in the event that monitoring detects noise levels that have exceeded the criteria specified in this EIR. Noise level measurements shall be conducted in compliance with the City of Monterey Park, City of Montebello, City of Commerce, City of Bell Gardens, City of Pasadena, and Los Angeles County requirements, as applicable.

The Noise Control Plan shall designate a Construction Relations Officer who is readily available to answer questions or respond to complaints during periods of any hours or days that construction or restoration is occurring. The applicant shall send pre-construction notifications to sensitive receptors located within 100 feet of construction activities at least 30 days prior construction. The notification shall include a phone number for the public to contact the Construction Relations Officer. Additionally, each construction site shall include clearly visible signs with

the Construction Relations Officer’s public phone number. The applicant shall submit monthly reports to the CPUC summarizing the complaints submitted to the Construction Relations Officer. The summary reports shall describe how each complaint was addressed, if and when it was resolved, and available contact information for the member of the public who submitted the complaint.

D2-181 MM NV-2 was created to address a deficiency in SCE’s proposed APM-NOI-01. Under Impact NV-1, it is noted that it is possible that the transformer noise at the 1990 Holly Oak Drive sensitive receptor may experience nighttime noise levels over Monterey Park’s 50-dBA nighttime noise standard. SCE proposed APM-NOI-01, which requires that SCE to decrease operational noise levels of substation transformers to 50 dBA as measured at residential receptors in areas of the City of Monterey Park. The CPUC superseded APM-NOI-01 with MM NV-2 because APM-NOI-01 contained no method to verify the noise reduction. The CPUC retained in MM NV-2 the 50-dBA standard proposed by SCE in its APM.

SCE comments that MM NV-2 should be removed because it is infeasible due to the ambient noise already exceeding the City of Monterey Park’s noise ordinance standard. The average 8-hour noise equivalent is 52 dBA at 1990 Holly Oak Drive, as shown in Table 4.10-3, but the 8-hour ambient Leq is not representative of nighttime noise. Table 4.10-3 shows that the lowest nighttime noise level at this location is 47 dBA (1-hour Leq). As indicated in Appendix J of the Draft EIR, the applicable ambient noise level for the Monterey Park noise standard is 50 dBA, as median nighttime noise level is approximately 50 dBA when taking into account the ambient noise measurements in Figure 3-6 from 10:00 p.m. to 7:00 a.m. The applicable noise standard—Monterey Park Municipal Code Title 9, Chapter 9.53—states that the noise standards are “the actual measured median ambient noise level or the . . . presumed noise level, whichever is greater.” The presumed noise levels are contained in Table 4.10-7 of the EIR and includes the 50-dBA daytime residential noise level. SCE has not presented evidence that the *nighttime* median ambient noise level is 52 dBA. The Monterey Park municipal code allows the noise standard to be the actual median ambient noise level if it is greater than the presumed ambient noise level and because the existing nighttime median noise level is at the threshold of the municipal code standard MM NV-2 and Impact NV-1 has been revised to better reflect the nighttime noise standards in the Monterey Park municipal code.

Page 4.10-23:

As shown in Table 4.10-15, noise levels would exceed the City of Monterey Park’s 50 dBA nighttime noise standard for residential land uses by 3 dBA at the property line of residences along Holly Oak Drive, which would be a significant impact. The lowest nighttime ambient noise levels were measured at 47 dBA at this location, and it appears that the nighttime median noise level is approximately 50 dBA. Operation of the Mesa Substation would increase the ambient noise by 3 dBA. This would violate the Monterey Park municipal code and would be a significant impact. Existing ambient noise over a 24-hour period was determined to be 73.1 dBA at the Encanto Walk development (Monterey Park 2011). Nighttime noise would likely be less than the 24-hour average but may still exceed the 50 dBA nighttime noise standard. This impact would be significant before mitigation.

The receptors on Holly Oak Drive are the closest to the 500/220-kV transformers, with the closest receptors being approximately 1,000 feet from the transformers (about 100 feet closer than 1990 Holly Oak Drive). To reduce transformer noise to meet the applicable standard of 50 dBA or lower in the residential areas and 55 dBA or lower in commercial areas of the City of Monterey Park and to prevent further increases in an existing exceedance of the threshold at either Holly Oak Drive or Encanto Walk, SCE would implement APM-NOI-01. Impacts would still be significant after implementation of APM-NOI-1 because there is no mechanism in the APM to require verification that the engineering solution abated noise to below the 50-dBA threshold. Furthermore, it is possible that conditions may change such that ambient noise levels may increase to above 50 dBA by the time the proposed project is operational, given the small difference between 47 and 50 dBA. Such an increase would result in APM NOI-01 requiring SCE to mitigate the 53-dBA transformer noise level to less than ambient noise levels, which would not be feasible. MM NV-2 supersedes APM-NOI-1 and would require verification of ambient noise levels and adequate noise reduction and implementation of additional measures until the threshold is met. Impacts would be less than significant after mitigation.

Page 4.10-33:

MM NV-2: Operational Substation Noise Monitoring Compliance with Monterey Park Ordinance. As soon as Mesa Substation is fully operational, the applicant shall conduct noise measurements to ensure that the operational noise levels from the substation transformers do not exceed the City of Monterey Park's ~~50-dBA~~ nighttime noise standard (50 dBA or actual measured median ambient noise level, whichever is greater) at the closest receptor. If the nighttime noise standard threshold is exceeded, the applicant shall implement engineering solutions, including, but not limited to, barrier walls around the transformer, sound absorbing panels, and/or noise cancellation methods until the project does not exceed the threshold nighttime noise standard. SCE must submit the noise measurements in the form of a memorandum to the CPUC within two weeks of measurement. Reports shall be submitted until the CPUC verifies that operation noise does not exceed the City of Monterey Park's ~~50-dBA~~ nighttime noise standard. ~~Threshold.~~

A typographical error has also been corrected on page 4.10-10, with additional revisions made for clarity.

Page 4.10-10:

Notes:

- (1) These values are the actual median ~~um~~ noise level measured or the presumed ambient noise level (as listed in Table 4.10-7) at a receiving property.
- (2) As noted in Section 9.53.070 of the City of Monterey Park Municipal Code, construction or demolition work conducted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays (Monday through Friday) and the hours of 9:00 a.m. and 6:00 p.m. on Saturdays, Sundays, and holidays are exempt from noise standards identified in this table.

D2-182 The following revision was made to MM NV-4 based on updated information provided by SCE.

Pages ES-21, 4.10-34, and 8-21:

MM NV-4: Positioning of Helicopter Landing and Takeoff Areas. SCE shall position helicopter landing and takeoff areas in Staging Yards 1, 2, and 3, and 4 as far away as feasible from sensitive receptors, while not sacrificing the safety of helicopter operations due to hazards (e.g., transmission lines) in and around the staging yards. SCE must submit helicopter locations to the CPUC for review and approval at least 30 days prior to use of the helicopter location.

D2-183 The following edits were made to the EIR.

Page 4.12-5:

Solid Waste

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

D2-184 The following edits were made to Table 4.12-3 of the EIR.

Page 4.12-5:

Table 4.12-3 Landfills Serving the Proposed Project

Landfill	Distance to Mesa Substation (miles)	Estimated Closure Date	Total Amount of Waste Permitted (cubic yards)	Remaining Estimated Waste Capacity (cubic yards)
Savage Canyon Landfill	10	2055	19,337,450	9,510,833
Azuza <u>Azusa</u> Land Reclamation	17	2025	66,670,000	34,100,000
Scholl Canyon Landfill	36	2030	58,900,000	9,900,000
<u>El Sobrante Landfill</u>	<u>40</u>	<u>2040</u>	<u>184,930,000</u>	<u>145,530,000</u>

Source: CalRecycle 2015a,b,c

D2-185 The applicant is required to comply with existing laws and regulations. However, CEQA does not prohibit including compliance with a law as a mitigation measure. MM HY-1 shall remain in place to ensure measures used to mitigate significant impacts on the environment are disclosed.

The following edits have been made to correct a typographical error.

Page 4.12-14:

Impacts to these drainage features, grading, vegetation removal and the introduction of new impervious surfaces would increase water runoff to the storm water drainage system during construction. The use of water for dust control purposes would also contribute to runoff. Onflow from upstream areas (i.e., ~~west east~~ of the proposed substation site area) would also be interrupted by construction of the proposed substation.

D2-186 Based on updated water use numbers provided by SCE, the following change to the EIR has been made to ensure consistency with the Hydrology and Water Quality section.

Page 4.12-15:

Given the likely OSY and predicted demand, it is reasonable to assume that the City will produce more than its entitlement during the years of project construction and will be required to pay the Watermaster a fee to recharge the ground basin. To conservatively assess impacts, it is assumed that up ~~to half of the estimated construction water, or~~ 140 AF, may be used in the first two years and last year of construction, when the majority of grading activities would occur, and less in ~~other subsequent~~ years. This water requirement would add to the City's expected overproduction beyond their entitlement.

D2-187 Based on SCE's comment, the following edits have been made.

Page 4.12-17:

During construction of the proposed project, solid waste, e.g., waste from building construction, waste associated removal of existing buildings, excess soils, green waste, refuse, spoils, and treated wood poles would be generated. Treated wood poles would be reused by SCE, returned to the manufacturers, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of an RWQCB-certified municipal landfill, as discussed further in Section 4.7, "Hazards and Hazardous Materials." The remaining solid waste that cannot be recycled would be classified and transported to Savage Canyon Landfill, ~~Azuza~~ Azusa Land Reclamation Landfill, ~~or~~ Scholl Canyon Landfill, or El Sobrante Landfill in accordance with all applicable federal, state, and local regulations for solid and hazardous waste disposal. These ~~three~~ four landfills have a combined remaining capacity of approximately ~~53.5~~ 199 million cubic yards (CY) (CalRecycle 2015a, b, c) as shown in Table 4.12-3. The estimated quantity of solid waste that would be generated for the proposed project to be deposited at approved landfills is

approximately 41,800 CY. Impacts under this criterion would be less than significant.

The revisions do not affect the significance conclusion, which found the proposed project's impacts less than significant for Impact PSU-7.

D2-188 The following edit has been made.

Pages ES-23, 4.12-18, and 8-25:

MM PS-1: Relocation Agreement with Municipal Metropolitan Water District.

Prior to construction that would take the MWD's 72-inch Middle Feeder Pipeline out of service, the applicant shall reach an agreement with the MWD that will identify an alternate alignment that crosses the project site. This relocation agreement will enable the MWD to maintain reliable deliveries of treated water to its member agencies during relocation of the pipeline. SCE shall submit to the CPUC information from the MWD confirming that relocation of the pipeline will not result in inability to adequately serve customers. SCE shall submit this documentation at least 30 days prior to the pipeline being taken out of service.

D2-189 The following edit was made.

Page 4.13-5:

During peak construction periods, the applicant estimates that up to approximately 435 employees could be working simultaneously on various components throughout the proposed project area. This number conservatively assumes that peak construction of the proposed Mesa Substation; transmission, subtransmission, and distribution relocations; and telecommunications work may all occur simultaneously. The average number of workers is estimated to be approximately 126. The applicant anticipates that construction would be performed by either the applicant's local construction crews or contractors commuting from the Los Angeles area and would not require workers to relocate (SCE 2015a). However, in the event that local construction crews or contractors are not available, and the applicant were to hire up to 435 non-local employees ~~for the entire duration of construction during peak periods of construction, or an average of approximately 126 workers for the duration of the project,~~ the temporary relocation of workers to the project area ~~for approximately 55 months~~ could result in a minor increase in the use of existing neighborhood and regional parks or other recreational facilities.

D2-190 The following edits have been made.

Page 4-14-1:

Comments related to the Metro Eastside Transit Corridor Project were taken into consideration in preparation of Section 6.0, "Cumulative Impacts and Other CEQA Considerations." There would be no impact to SR 164; therefore, ~~SR 164 the Metro Eastside Transit Corridor Project~~ is not discussed further in this analysis. All other

comments are addressed in this section.

D2-191 The following edits have been made.

Page 4.14-2:

Local roadways in the vicinity of the proposed project area are listed in Table 4.14-1. Table 4.14-1 also lists the intersections that would be ~~impacted~~ utilized by project-related traffic. Key intersections and roadway segments were included in the analysis based on the proposed travel routes for construction trips, existing traffic volumes, and comments received from Caltrans regarding state operated roadways.

Table 4.14-1 Local Roadways ~~Impacted~~ Utilized by Project-Related Traffic

Road	Description	Intersections Studied (Jurisdiction)
Potrero Grande Drive	<ul style="list-style-type: none"> • Five-lane principal arterial • Sidewalks present • Parking located on segment near project area 	<ul style="list-style-type: none"> • Markland Drive/SR 60 WB off-ramp (Monterey Park) • Greenwood Avenue (Saturn Street) (Monterey Park) • Hill Drive (Del Mar Avenue) (unincorporated Los Angeles County) • Segment (non-intersection) between Markland Drive and Greenwood Avenue (Monterey Park)
Markland Drive	<ul style="list-style-type: none"> • Four-lane roadway • Sidewalks present • No parking on segment near project area 	<ul style="list-style-type: none"> • Via Campo/SR 60 EB on-ramp (Montebello) • Potrero Grande Drive/SR 60 WB off-ramp (Monterey Park)
Greenwood Avenue (Saturn Street)	<ul style="list-style-type: none"> • Two- to Four-lane minor arterial • Sidewalks present north of Potrero Grande Drive • No parking on segment near project area 	<ul style="list-style-type: none"> • Potrero Grande Drive (Monterey Park)
Hill Drive (Del Mar Avenue)	<ul style="list-style-type: none"> • Four-lane • Sidewalks present • Parking allowed north of Potrero Grande Drive 	<ul style="list-style-type: none"> • Potrero Grande Drive (unincorporated Los Angeles County) • Paramount Boulevard (unincorporated Los Angeles County)
Paramount Boulevard	<ul style="list-style-type: none"> • Four-lane principal arterial • Sidewalks present west side of the roadway • Parking present 	<ul style="list-style-type: none"> • Hill Drive (Del Mar Avenue) (unincorporated Los Angeles County) • Neil Armstrong Street/SR 60 WB ramps (Montebello) • Town Center Drive/SR 60 EB Ramps (Montebello)
San Gabriel Boulevard	<ul style="list-style-type: none"> • Four-lane principal arterial • Sidewalks present • Parking present 	<ul style="list-style-type: none"> • Walnut Grove Avenue (Rosemead) • SR 60 WB Ramps (Rosemead) • Montebello Town Center (Rosemead)
Neil Armstrong Street	<ul style="list-style-type: none"> • Two-lane local street • Sidewalks present • Parking present 	<ul style="list-style-type: none"> • Paramount Boulevard/SR 60 WB ramps (Montebello)

Table 4.14-1 Local Roadways Impacted Utilized by Project-Related Traffic

Road	Description	Intersections Studied (Jurisdiction)
Town Center Street	<ul style="list-style-type: none"> Four-lane local street Sidewalks present No parking on segment near project area 	<ul style="list-style-type: none"> Paramount Boulevard/SR 60 WB ramps (Montebello)
Garfield Avenue	<ul style="list-style-type: none"> Five-lane principal arterial Sidewalks present Parking present 	<ul style="list-style-type: none"> Pomona Boulevard (Montebello) Via Campo (Montebello)
Via Campo	<ul style="list-style-type: none"> Five-lane arterial Sidewalks present on the south side of the road No parking on segment near project area 	<ul style="list-style-type: none"> Garfield Avenue (Montebello) Wilcox Avenue (Montebello) Markland Drive/SR 60 EB on-ramp (Montebello)
Wilcox Avenue	<ul style="list-style-type: none"> Two- to five-lane minor arterial Sidewalks No parking on segment near project area 	<ul style="list-style-type: none"> Pomona Boulevard (Montebello) Via Campo (Montebello)
Pomona Boulevard	<ul style="list-style-type: none"> Three-lane principal arterial Sidewalks present Parking present 	<ul style="list-style-type: none"> Garfield Avenue (Montebello) Wilcox Avenue (Montebello)
Montebello Town Center Drive	<ul style="list-style-type: none"> Two- to four-lane local street No sidewalks present No parking on segment near project area 	<ul style="list-style-type: none"> Montebello Boulevard/SR 60 EB ramps (Rosemead) San Gabriel Boulevard (Rosemead)
Montebello Boulevard	<ul style="list-style-type: none"> Four-lane minor arterial Sidewalks present Bicycle lanes present No parking on segment near project area 	<ul style="list-style-type: none"> Montebello Town Center Drive/SR 60 EB ramps (Rosemead)
Walnut Grove Avenue	<ul style="list-style-type: none"> Five-lane minor arterial Sidewalks present Parking present 	<ul style="list-style-type: none"> San Gabriel Boulevard (Rosemead)

Key:
 EB Eastbound
 SR State Route
 WB Westbound

D2-192 Table 4.14-12 has been changed to show daily trips as “two-way” trips. Corresponding text has been updated to reflect this change.

Page 4.14-19:

Table 4.14-12 Phase I Construction Trip Generation

Project Component	Passenger Car Equivalent Trips		
	Daily Trips (one two-way)	AM Peak Hour (one way)	PM Peak Hour (one way)
On-site Construction Worker Vehicles	765 383	71	311
Off-site Construction Worker Vehicles	43 22	4	18

Table 4.14-12 Phase I Construction Trip Generation

Project Component	Passenger Car Equivalent Trips		
	Daily Trips (one two-way)	AM Peak Hour (one-way)	PM Peak Hour (one-way)
Medium Heavy Vehicles	532266	52	52
Large Heavy Vehicles	804402	72	72
<i>Phase I Total</i>	2,1441,072	199	453

Source: Transpo Group 2015

Note: AM peak hour = 7:30 a.m. to 8:30 a.m.; PM peak hour = 4:00 p.m. to 5:00 p.m

Page 4.14-19:

Phase I

Phase I would generate trips due to worker vehicles, equipment delivery, soil import and export, and other similar activities. Trips would vary throughout the 18-month-long Phase I. At peak activity levels, Phase I of the proposed Mesa Substation would generate up to ~~2,1441,072~~ (~~one~~two-way) daily passenger car equivalent (PCE) trips, as shown in Table 4.14-12.

D2-193 Garfield Avenue/Pomona Boulevard and Garfield Avenue/Via Campo, which would not experience significant impacts during the AM peak hour, have been removed from this list of intersections where significant impacts would occur. Wilcox Avenue/Pomona Boulevard has not been removed from the list as this intersection would exceed the established threshold and therefore would result in a significant impact.

Page 4.18-19:

Intersections

As shown in Table 4.14-13, significant impacts would occur at ~~one~~ three intersections during the AM peak hour:

- ~~Garfield Avenue/Pomona Boulevard (Montebello)~~
- ~~Garfield Avenue/Via Campo (Montebello)~~
- Markland Drive/Via Campo – SR 60 EB On-Ramp (Montebello)

Additionally, significant impacts would occur at five intersections during the PM peak hour:

- Garfield Avenue/Pomona Boulevard (Montebello)
- Garfield Avenue/Via Campo (Montebello)
- Wilcox Avenue/Pomona Boulevard (Montebello)

- Markland Drive/Via Campo – SR 60 EB On-Ramp (Montebello)
- Paramount Boulevard/SR 60 WB Ramps – Neil Armstrong Street (Montebello)

D2-194 Compliance with permit requirements alone is not enough to show how impacts would be reduced to less than significant; therefore, details regarding potential measures has been included in the EIR. In addition, language has been added to the EIR indicating how specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equal to or more effective than the mitigation identified in the EIR.

MM TT-1 has been revised, as shown in response to comment A2-2, to allow for compliance with permit conditions to satisfy MM TT-1 under certain limited circumstances, subject to review and approval by the CPUC prior to the start of construction. Note also that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-2 referenced in the comment.

D2-195 Table 4.14-15 has been changed to show daily trips as “two-way” trips. Corresponding text has been updated to reflect this change.

Page 4.14-23:

Phase II

Phase II would generate fewer trips compared to Phase I. Trips would vary throughout the 9-month-long Phase II. At peak activity levels, Phase II of the proposed Mesa Substation would generate up to ~~789~~³⁹⁵ (~~one~~^{two}-way) daily PCE trips, as shown in Table 4.14-15.

Table 4.14-15 Phase II Construction Trip Generation

Project Component	Passenger Car Equivalent Trips		
	Daily Round Trips (one ^{two} -way)	AM Peak Hour (one ^{one} -way)	PM Peak Hour (one ^{one} -way)
On-site Construction Worker Vehicles	455 ²²⁸	45	183
Off-site Construction Worker Vehicles	26 ¹³	3	10
Medium Heavy Vehicles	14 ⁷	12	12
Large Heavy Vehicles	16 ⁸	12	12
<i>Phase II Total</i>	789³⁹⁵	79	217

Source: Transpo Group 2015

Note: AM peak hour = 7:30 a.m. to 8:30 a.m.; PM peak hour = 4:00 p.m. to 5:00 p.m.

D2-196 See response to comment D2-194. Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-2 referenced in the comment, as shown in response to comment A2-2.

D2-197 Table 4.14-17 has been changed to show daily trips as “two-way” trips. Corresponding text has been updated to reflect this change.

Page 4.14-26:

Phase III

Phase III would generate fewer trips compared to Phase I. Trips would vary throughout the 24-month-long Phase III. At peak activity levels, Phase III of the proposed Mesa Substation would generate up to ~~1,086,543 (one-way)~~ **1,086,543 (two-way)** daily PCE trips, as shown in Table 4.14-17.

Page 4.14-26:

Table 4.14-17 Phase III Construction Trip Generation

Project Component	Passenger Car Equivalent Trips		
	Daily Trips (one two -way)	AM Peak Hour (one-way)	PM Peak Hour (one-way)
On-site Construction Worker Vehicles	295,148	29	119
Off-site Construction Worker Vehicles	179	2	7
Medium Heavy Vehicles	844	8	8
Large Heavy Vehicles	690,345	66	66
<i>Phase III Total</i>	1,086,543	105	200

Source: Transpo Group 2015

Note: AM peak hour = 7:30 AM to 8:30 AM; PM peak hour = 4:00 PM to 5:00 PM

D2-198 See response to comment D2-194. Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-2 referenced in the comment, as shown in response to comment A2-2.

D2-199 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, details regarding how existing regulatory processes and mitigation measures reduce significant impacts has been included in the EIR. In addition, language has been added to the Final EIR indicating specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in the EIR.

Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-2 referenced in the comment, as shown in response to comment A2-2.

D2-200 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, detail regarding how existing regulatory processes and mitigation measures reduce significant impacts has been included in the EIR. In addition, language has been added

to the EIR indicating how specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in the EIR.

Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-3 referenced in the comment, as shown in response to comment A2-2.

- D2-201 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, no change has been made to the EIR.
- D2-202 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, no change has been made to the EIR.
- D2-203 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, no change has been made to the EIR.
- D2-204 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, details regarding how existing regulatory processes and mitigation measures reduce significant impacts has been included in the EIR. In addition, language has been added to the EIR indicating how specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in the EIR.
- Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-6 referenced in the comment, as shown in response to comment A2-2.
- D2-205 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, details regarding how existing regulatory processes and mitigation measures reduce significant impacts has been included in the EIR. In addition, language has been added to the EIR indicating how specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in the EIR.
- Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TTs 2, 3, 6, 7, 8, 9, and 10 referenced in the comment, as shown in response to comment A2-2.
- D2-206 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, detail

regarding how existing regulatory processes and mitigation measures reduce significant impacts has been included in the EIR. In addition, language has been added to the EIR indicating how specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in the EIR.

Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-7 referenced in the comment, as shown in response to comment A2-2.

D2-207 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, detail regarding how existing regulatory processes and mitigation measures reduce significant impacts has been included in the EIR. In addition, language has been added to the EIR indicating how specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in the EIR.

Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-9 referenced in the comment, as shown in response to comment A2-2.

D2-208 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, detail regarding how existing regulatory processes and mitigation measures reduce significant impacts has been included in the EIR. In addition, language has been added to the EIR indicating how specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in the EIR.

Note that MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-10 referenced in the comment, as shown in response to comment A2-2.

D2-209 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, detail regarding how existing regulatory processes and mitigation measures reduce significant impacts has been included in the EIR. In addition, language has been added to the EIR indicating how specific transportation and traffic mitigation measure requirements may be satisfied through compliance with permit conditions, or other authorizations obtained by the applicant, if these requirements are equally or more effective than the mitigation identified in the EIR.

Note that MM TT-1 has been revised in the Final EIR per the comment, and also to include the requirements of Draft EIR MM TTs-2, -3, -6, -7, -8, -9, and -10 referenced in the comment, as shown in response to comment A2-2.

- D2-210 MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-2 referenced in the comment, as shown in response to comment A2-2. Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, MM TT-1 would be required to reduce impacts to a less than significant level.
- D2-211 MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-3 referenced in the comment, as shown in response to comment A2-2. Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, MM TT-1 would be required to reduce impacts to a less than significant level.
- D2-212 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, no change has been made to the EIR.
- D2-213 Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, no change has been made to the EIR.
- D2-214 MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-6 referenced in the comment, as shown in response to comment A2-2. Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, MM TT-1 would be required to reduce impacts to a less than significant level.
- D2-215 MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-7 referenced in the comment, as shown in response to comment A2-2. Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, MM TT-1 would be required to reduce impacts to a less than significant level.
- D2-216 MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-8 referenced in the comment, as shown in response to comment A2-2. Compliance with permit requirements alone is not enough to show impacts would be reduced to less than significant; therefore MM TT-1 would be required to reduce impacts to a less than significant level.
- D2-217 MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-9 referenced in the comment, as shown in response to comment A2-2. Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, MM TT-1 would be required to reduce impacts to a less than significant level.
- D2-218 MM TT-1 has been revised in the Final EIR to include the requirements of Draft EIR MM TT-10 referenced in the comment, as shown in response to comment A2-2. Compliance with permit requirements alone does not sufficiently demonstrate how significant impacts would be reduced to less than significant levels; therefore, MM

TT-1 would be required to reduce impacts to a less than significant level.

D2-219 Traffic and transportation mitigation measures have been renumbered based on consolidation of mitigation measures. The name of the education center has been updated in the Final EIR. MM TT-11 in the Draft EIR has been re-numbered as MM TT-4 in the Final EIR and has been updated with SCE's proposed edits; however, the CPUC has left a reference to the education center concurring that sufficient parking would be available during project construction.

The following edits have been made.

Pages 4.14-47, ES-27, and 8-31:

MM TT-114: Pasadena City College Community Education Center Parking. If proposed project work at the Goodrich Substation would result in parking spot closures at the Pasadena City College Community Education Center parking lot, SCE shall coordinate scheduled closures with the Pasadena City College Community Education Center on the following and shall obtain a letter from the Community Education Center that states:

- The dates of parking spot closures; and
- The number of parking spots that would be closed; ~~and~~
- ~~That the Community Education Center concurs that there will be sufficient parking spots to accommodate SCE's work and the Community Education Center's parking needs.~~

SCE shall submit ~~the letter~~ documentation to the CPUC 30 days prior to Community Education Center parking spot closure demonstrating coordination with the Pasadena City College Community Center and concurrence from the Pasadena City College Community Education Center that there will be sufficient parking spots to accommodate SCE's work and the Pasadena City College Community Education Center's parking needs.

D2-220 Refer to response to comment D2-57 regarding the project-level analysis that concludes that impacts of the project to views of the substation site from Potrero Grande Avenue (KOP 3) would be significant under Landscape Option 1 until trees reach maturity and less than significant with mitigation and would be significant under Landscape Option 2. Part of the rationale for the conclusion that impacts would be significant is that the new structures at the substation site would be more dominant than the existing structures and would add new geometric forms and lines to the view. The changes would produce strong contrast and reduce intactness and unity of views from Potrero Grande Drive. It follows that the reduced number of new structures associated with the One-Transformer-Bank Substation Alternative, when compared to the proposed project, would produce less contrast and would not reduce intactness and unity of views as much as the proposed project, even though the new structures would still be visually dominant. The Final EIR recognizes that the reduction in visual impacts would be "slight" compared to the proposed project. The text has been revised to clarify the analysis.

Page 5-4:

Construction of the One-Transformer-Bank Substation Alternative would result in slightly reduced aesthetic impacts. The 500-kV switchrack would be about half the size of the switchrack for the proposed projects, which would result in fewer structures at the substation visible from viewpoints on Potrero Grande Drive. Fewer structures associated with the One-Transformer-Bank Substation Alternative, when compared to the proposed project, would result in slightly less of an increase in contrast and slightly less of a decrease of intactness and unity of views when compared to the proposed project. However, the transformer bank and 500-kV switchrack would be located adjacent to Potrero Grande Drive, closer to viewers, meaning that the new substation structures would still be visually dominant. The reduction in visual impacts (Impact AE-1) would be slight compared to the proposed project’s visual impacts.

As described on page 5-2 of the Draft EIR, CEQA Guidelines Section 15126.6(d) states that “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effect in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” CEQA recognizes that the alternatives discussion can be less detailed than that of the proposed project. The absence of visual simulations of the One-Transformer-Bank Substation does not equate to a lack of support for a conclusion that visual impacts of the One-Transformer-Bank Substation would be less than those of the proposed project. As included in the EIR and above, CPUC’s conclusion that the alternative would slightly reduce visual impacts is backed by evidence—that the switchrack would be smaller than the proposed project, with fewer visible structures. Therefore, no changes have been made to the conclusion that this alternative would have a slight reduction in visual impacts (Impact AE-1) when compared to the proposed project.

D2-221 Noise impacts would be reduced under the One-Transformer-Bank Substation Alternative, the Two-Transformer-Bank Transformer Alternative, and the Gas-Insulated Substation Alternative. (See analysis on EIR pages 5-12, 5-16, and 5-21, respectively.) From the perspective of a numerical measure of noise, however, noise would only be negligibly reduced (by about 2 dBA) under each alternative when compared to the proposed project. Because a change of less than 3 dBA would not be perceptible, the analysis has been revised to clarify that the noise from each alternative would be similar to the noise from the proposed project. The following revisions have been made to the EIR to reflect this clarification:

Page ES-27, Table ES-3 (One-Transformer-Bank Substation Alternative and Two-Transformer-Bank Substation Alternative):

- ~~Noise: Negligibly reduces construction noise (Impact NS-4).~~

Page ES-28, Table ES-3:

- ~~Noise: Negligibly reduces construction noise (Impact NS-4).~~

Page 5-8 (Table 5.3-3):

Noise	<ul style="list-style-type: none"> • Impact NV-4 (significant and unavoidable)N/A— <u>No impact reduced by alternatives</u> 	Less (2) Similar <u>(N/A)</u>	Less (2) Similar <u>(N/A)</u>	Less <u>Similar (N/A)</u>	Gas-Insulated <u>Substation</u> <u>Equal⁴</u>
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Page 5-13:

Noise from the proposed project may be reduced under the One-Transformer-Bank Substation Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The One-Transformer-Bank Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive receptors on Holly Oak Drive by approximately 170 feet. Thus, noise impacts at these receptors would be reduced by about 2 A-weighted decibels (dBA). Reduction in noise by 2 dBA would not result in a perceptible difference in noise levels. Construction of the One-Transformer-Bank Substation Alternative would ~~negligibly reduce noise impacts~~ be similar (Impact NV-4) ~~compared~~ to the impacts of the proposed project.

Page 5-18:

Noise from the proposed projects may be reduced under the Two-Transformer-Bank Substation Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The Two-Transformer-Bank Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive receptors on Holly Oak Drive by approximately 170 feet. Thus, noise impacts at these receptors would be reduced by about 2 dBA. Reduction in noise by 2 dBA would not result in a perceptible difference in noise levels. Construction of the Two-Transformer-Bank Substation Alternative would ~~negligibly reduce noise impacts~~ be similar (Impact NV-4) ~~compared~~ to the impacts of the proposed project.

Page 5-24:

Noise from the proposed project may be reduced under the Gas-Insulated Substation Alternative because less construction would take place close to sensitive receptors on Holly Oak Drive. The Gas-Insulated Substation Alternative would increase the distance of the substation construction activities to the nearest sensitive receptors on Holly Oak Drive by approximately 190 feet. Thus, noise impacts at these receptors would be reduced by about 2 dBA. Reduction in noise by 2 dBA would not result in a perceptible difference in noise levels. Construction of the Gas Insulated Substation Alternative would ~~negligibly reduce noise impacts~~ be similar (Impact NV-4) ~~compared~~ to the impacts of the proposed project. All

other impacts related to noise under this alternative would be the same as those associated with the proposed project.

Refer to response to comment D1-18 for revisions to the discussion about the environmentally superior alternative.

D2-222 No scenario exists in the comparison of alternatives where all three alternatives would result in the same level of impact reduction when compared to the proposed project. The following revisions were made to correct the noted error and to be consistent with the analysis in the text that follows Table 5.3-3.

Page 5-8:

Land Use and Planning	• N/A—No Impact	Similar (N/A)	Similar (N/A)	Similar (N/A)	Equal ^{3,4}
Population and Housing	• N/A—No Impact	Less Similar (N/A)	Less Similar (N/A)	Less Similar (N/A)	Equal ⁴ ly superior ^{3,5}
Recreation	• N/A—No Impact	Similar (N/A)	Similar (N/A)	Similar (N/A)	Equal ^{3,4}

Page 5-9:

Notes:

- (1) A rank is not provided if the alternatives would result in indistinguishable environmental impacts.
- (2) If the Environmentally Superior Alternative is the No Project Alternative, CEQA requires the identification of an Environmentally Superior Alternative among the other alternatives (CEQA Guidelines Section 15126.6).
- ~~(3) All three alternatives have approximately the same environmental impact such that none are superior to the other considered alternatives but are superior to the proposed project.~~
- (4) All three alternatives have similar impacts to the proposed project, such that no alternatives would reduce an environmental impact of the proposed project.
- ~~(5) All three alternatives considered are environmentally superior to the proposed project.~~

Key:

MVA megavolt amperes
N/A not applicable

D2-223 All soil has the potential to erode, whether the potential is low or high. A smaller ground disturbance area in the same location would reduce the potential for soil to erode by mobilizing less soil. Construction of the One-Transformer-Bank Substation Alternative would disturb 14.4 less acres of land than the proposed project would during excavation and grading. It follows that the potential for erosion under the One-Transformer-Bank Alternative would be slightly less than the potential for erosion under the proposed project. No revisions were made to the text of the EIR.

D2-224 Refer to response to comment D2-221. The analysis has been revised to reflect that the One-Transformer-Bank Substation Alternative would not result in a perceptible difference in noise when compared to the proposed project.

- D2-225 All soil has the potential to erode, whether the potential is low or high. A smaller ground disturbance area in the same location would reduce the potential for soil to erode by mobilizing less soil. Construction of the Two-Transformer-Bank Substation Alternative would disturb 11 less acres of land than the proposed project would during excavation and grading. It follows that the potential for erosion under the Two-Transformer-Bank Substation Alternative would be slightly less than the potential for erosion under the proposed project. No revisions were made to the text of the EIR.
- D2-226 Refer to response to comment D2-221. The analysis has been revised to reflect that the Two-Transformer-Bank Substation Alternative would not result in a perceptible difference in noise when compared to the proposed project.
- D2-227 All soil has the potential to erode, whether the potential is low or high. A smaller ground disturbance area in the same location would reduce the potential for soil to erode by mobilizing less soil. Construction of the Gas-Insulated Substation Alternative would disturb 10 less acres of land than the proposed project would during excavation and grading. It follows that the potential for erosion under the Gas-Insulated Substation Alternative would be slightly less than the potential for erosion under the proposed project. No revisions were made to the text of the EIR.
- D2-228 Refer to response to comment D2-221. The analysis has been revised to reflect that the Gas-Insulated Substation Alternative would not result in a perceptible difference in noise when compared to the proposed project.
- D2-229 Refer to response to comment D2-83 for more information regarding the documents submitted by SCE. Based on updated information provided by SCE, the following change to the EIR has been made.

Page 6-14:

These waters contain some sensitive riparian vegetation; the impact was deemed significant in the EIR (City of Montebello 2014). The proposed Mesa Substation Project would result in permanent fill of ~~3.7~~ .37 acres of ~~potentially jurisdictional~~ waters of the US (USACE/RWQCB) and 2.66 acres of jurisdictional streambed and associated riparian habitat (CDFW). Short extents of the potentially jurisdictional waters on the substation site are associated with riparian vegetation, including mulefat scrub and riparian woodland (which is atypical for its type due to high levels of disturbance).

- D2-230 The following revision has been made to correct the noted typographical error.

Page 6-20:

The Mesa Substation Project would contribute to the significant cumulative greenhouse gas impact because the project would result in emissions of greenhouse gases. During construction, emissions would be generated by equipment/vehicle usage. During operation, emissions would be generated by equipment/vehicle usage and through SF₆ leakage from ~~transformers~~ circuit breakers.

D2-231 See responses to comments D2-232 through D2-276 regarding SCE’s recommended edits to Section 8.0, “Mitigation Monitoring and Reporting Plan.”

D2-232 The following revision has been made to clarify step 1 of the dispute resolution procedure:

Page 8-4:

- **Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC ~~designated project manager~~ Project Manager or Compliance Manager for resolution. The CPUC Project Manager or Compliance Manager will attempt to resolve the dispute. If the dispute can be resolved by SCE, then the CPUC’s Project Manager would direct the person to SCE. If the complaint is received by SCE’s Construction Relations Officer pursuant to MM NS-1 (Noise Control Plan), the complaint would be handled in accordance with MM NS-1.

D2-233 MM AES-2 has been revised as described in response to comment D2-61.

D2-234 Refer to response to comment D2-63.

D2-235 Revisions to the timing of APM-AIR-02 have been made in Table 8-1 “Final Mitigation Monitoring and Reporting Plan.”

Page 8-8:

Prior to and During Construction

D2-236 Refer to the responses to comments D2-64 and D2-65 for an explanation regarding changes to MM AQ-1. Revisions to the timing of MM AQ-1 have been made in Table 8-1 “Final Mitigation Monitoring and Reporting Plan.”

Page 8-8:

Prior to and During Construction

D2-237 Refer to response to comment D2-66.

D2-238 Refer to response to comment D2-67.

D2-239 Refer to response to comment D2-68.

D2-240 See response to comment D2-84.

D2-241 See response to comment D2-85.

D2-242 See responses to comments D2-86, D2-87, D2-88, D2-89, and D2-90.

Regarding SCE's suggestion to delete "To minimize the removal of vegetation in habitat areas of the coastal California gnatcatcher," see response to comment D2-78 for a discussion of the EIR's criteria for gnatcatcher habitat. The text the commenter is proposing to delete is supported by substantial evidence in the record, including the criteria for gnatcatcher habitat in the EIR, and no deletions were made to this text in response to this comment. MM BR-3 does not require review or approval by the USACE; therefore, SCE's suggestion that the USACE be included under the "Monitoring Requirements" column of the MMRP was not implemented.

SCE's suggested deleting "if these requirements are equally or more effective" and replacing it with "as approved by the regulating agency." CEQA Guidelines section 15088 requires the Lead Agency to respond to comments raising environmental issues. This comment does not raise an environmental issue with the analysis in the EIR; therefore, no additional response is required.

D2-243 See responses to comments D2-91, D2-92, and D2-93.

D2-244 The suggested revisions to timing of MM BR-5 have been made.

Page 8-13:

Prior to Construction – Submit WEAP During Construction – Submit sign-in sheets monthly

D2-245 See responses to comments D2-94, D2-95, D2-96, D2-97, and D2-98.

D2-246 See response to comment D2-95.

D2-247 See responses to comments D2-99, D2-100, D2-101, and D2-102.

D2-248 See response to comment D2-103.

D2-249 See responses to comments D2-104 and D2-105.

SCE suggested that the following text be added: "during LBVI activity periods" and "if work conducted near LBVI habitat during the breeding season." MM BR-13 specifies that the surveys will be conducted according to the survey protocol (USFWS 2001). The MMRP specifies that the location for MM BR-13 will be at "All work areas where suitable least Bell's vireo habitat exists." No changes to the EIR have been made in response to these comments.

D2-250 See response to comment D2-106.

D2-251 See response to comment D2-107.

SCE suggested that the following text be deleted: "The plan shall be submitted for review to the CDFW, USFWS, and CPUC at least 60 days prior to construction. CPUC approval is required before the plan is implemented" and "Prior to Construction – Develop an Avian Protection Plan." Because an Avian Protection Plan specific to the

Mesa Substation project is required by MM BR-15, no changes to the EIR have been made in response to these comments.

- D2-252 Refer to response to comment D2-1.
- D2-253 Refer to responses to comments D2-2 through D2-6.
- D2-254 Refer to response to comment D2-8.
- D2-255 Refer to responses to comments D2-9 and D2-10.
- D2-256 Refer to response to comment D2-149.
- D2-257 MM HZ-3 has been retained, as described in response to comment D2-141. Therefore, the requested change to MM HZ-2 has not been made.
- D2-258 Refer to the response to comment D2-151.
- D2-259 Refer to the response to comment D2-142 and D2-173.
- D2-260 Refer to the response to comment D2-174.
- D2-261 Refer to the response to comment D2-175.
- D2-262 MM HY-6 was removed from the EIR, including in Table 8-1. Refer to response to comment D2-29. The following revision has been made.

Page 8-23:

<p>MM HY-6: Dam Inundation Substation Protection. SCE shall incorporate dam inundation measures into its substation at the design phase to reduce the potential for widespread outages and equipment damages in the event of failure of the south dam at Garvey Reservoir. Measures could include:</p> <ul style="list-style-type: none"> • Concrete perimeter wall and flood gates at entry ways; • Elevation of key substation equipment above inundation levels; or • Sealing of equipment buildings. 	<p>CPUC shall verify that dam inundation measures are incorporated in the substation at its design phase.</p>	<p>Prior to Construction</p>	<p>All project areas located within the inundation areas of the south dam at Garvey Reservoir.</p>
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- D2-263 Refer to the response to comment D2-180.
- D2-264 Refer to the response to comment D2-181.
- D2-265 MM NV-4 has been modified. Refer to the response to comment D2-182.

- D2-266 Refer to response to comment D2-209.
- D2-267 Refer to response to comment D2-199.
- D2-268 Refer to response to comment D2-200.
- D2-269 Note that MM TT-4 remains a mitigation measure, but has been renumbered as MM TT-2 in the Final EIR, as shown in response to comment A2-2. Refer to response to comment D2-201.
- D2-270 Note that MM TT-5 remains a mitigation measure, but has been renumbered as MM TT-3 in the Final EIR, as shown in response to comment A2-2. Refer to response to comment D2-202.
- D2-271 Refer to response to comment D2-204.
- D2-272 Refer to response to comment D2-206.
- D2-273 Refer to response to comment D2-205.
- D2-274 Refer to response to comment D2-207.
- D2-275 Refer to response to comment D2-208.
- D2-276 Refer to response to comment D2-219.

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