C.2 ISSUE AREAS WHERE MODIFICATIONS RESULT IN NO SUBSTANTIAL CHANGE

The following section evaluates the environmental impacts associated with the changes to the approved Project as identified in SCE's *Petition for Modification of Decision No. 08-12-031* submitted on August 29, 2011 (SCE, 2011a). The discussion of environmental impacts has been organized by issue area and impact criterion, as defined in the Draft EIR.

C.2.1 Air Quality

As with the approved Project, the proposed changes to the Project would be constructed in compliance with applicable federal, State, and local requirements and would not change operating emissions. Therefore, the Project changes would not introduce any new air quality-related impacts or require any new mitigation. No odors would be expected from the Project's normal operating inspection and maintenance activities, which do not change as a result of the proposed changes to the Project.

Impact AQ-1: Construction emissions exceed regional significance criteria.

The proposed changes to the Project would require the installation of additional 115 kV poles along Segments 2 and 4. The only ground surface disturbance associated with the 115 kV subtransmission line work would result from the excavation required to install the poles (see Section B.1.4, Steel Pole Installation). No new access or spur roads would be required to access the pole locations as the route follows existing access roads. As such, the activities for the installation of the additional 115 kV poles would require limited construction equipment or earth movement. The majority of construction equipment and earth movement was forecast in the Final EIR to occur during substation grading and civil work construction activities, which are now complete. The 115 kV construction activities alone were forecast to be well below the regional significance criteria, which is based on maximum daily emissions. Even with additional pole construction, the maximum daily emissions associated with the 115 kV construction activities would remain well below the significance criteria. Therefore, the proposed changes to the Project would not cause additional exceedances of the regional significance criteria. No new or substantially more severe impacts would occur, and no additional mitigation measures would be needed.

Impact AQ-2: Construction emissions exceed localized significance criteria.

The proposed changes to the Project would result in a slightly greater amount of overall construction activity along the 115 kV subtransmission line route, where installation of poles would occur in close proximity to residences. However, the maximum daily emissions at any given pole site (localized emissions) would not increase beyond those estimated in Final EIR Table D.2-15, which were based on constructing tubular steel poles (TSPs) in place of the existing H-frame structures. As described in Section B.1.4 (Steel Pole Installation), TSPs require a greater amount of construction than LWS poles. With the proposed changes to the Project, a majority of the poles along Segments 2 and 4 would be LWS poles, thereby reducing the amount of construction at a given pole site. Therefore, no new or substantially more severe localized impacts would occur, and no additional mitigation measures would be needed.

Impact AQ-3: Emissions contribution to climate change.

The proposed changes to the Project would continue to meet the intent of the Project, which is to improve delivery of power that is currently transmitted to the local area and prevent overload of the existing system and would not substantially change the generation of GHG emissions. The proposed changes would not introduce more electrical switchgear equipment or circuit breakers; therefore, the project changes would not increase the potential to generate sulfur hexafluoride (SF_6), a potent greenhouse gas. As such, no new or substantially more severe impacts to climate change would occur as a result of the changes to the Project, and no additional mitigation measures are required.

C.2.2 Land Use

Impact LU-1: Conflict with applicable land use plans, policies, or regulations

Installation of the additional 115 kV poles along Segments 2 and 4 would occur within existing SCE ROW, same as the approved Project, and would not conflict with any applicable land use plans, policies, or regulations. No new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no mitigation measures are required.

Impact LU-2: Construction would temporarily disturb the land uses it traverses or adjacent land uses.

With mitigation, disturbance and disruption impacts resulting from construction of the proposed Project changes would not differ substantially from the approved Project. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact LU-3: Operation of the Project would result in permanent preclusion of land uses it traverses or adjacent land uses.

The proposed changes to the approved Project along Segments 2 and 4 would occur within the existing SCE ROW. As such, no new or substantially more severe impacts resulting from the permanent preclusion of traversed or adjacent land uses would occur as a result of the changes to the approved Project, and no mitigation measures are required.

Impact LU-4: Construction or operation would convert Farmland to non-agricultural use.

As described in Draft EIR Section D.3.1 (Environmental Setting for the Proposed Project), the only component of the approved Project that would be located on Farmland would be the 115 kV subtransmission line replacement between milepost 3.9 and 4.1. The proposed changes to the approved Project would not occur in this area. Although pulling and stringing activities associated with the Project's 115 kV subtransmission line replacement could occur on Farmland, the proposed changes to the approved Project would not modify pulling and stringing operations. As such, no new or substantially more severe impacts related to the conversion of Farmland to non-agricultural use would occur as a result of the changes to the approved Project, and no mitigation measures are required.

Impact LU-5: Construction or operation would interfere with agricultural operations.

The proposed changes to the approved Project would require the installation of additional 115 kV poles along Segments 2 and 4, thereby increasing both temporary and permanent impacts to agricultural operations along these portions of the 115 kV alignment. Construction activities could interfere with agricultural operations. Specifically, the removal and replacement of 115 kV subtransmission poles would temporarily impact 0.06 acre per pole and permanently impact 0.001 acre per pole; pulling and stringing activities would temporarily impact approximately 0.46 acre per pulling and stringing site every 6,000 feet. As with the approved Project, these activities could result in a temporary reduction of agricultural productivity. However, the additional proposed poles would not substantially increase the severity of this impact, as both the soil disturbance and presence of construction equipment would be temporary and limited in extent. Therefore, any increase in impacts to agricultural operations during construction would be minimal. As noted above, each additional pole along Segments 2 and 4 that falls within an area of agricultural operations would increase the amount of permanent disturbance on agricultural lands; however, each pole site would result in very limited permanent ground disturbance (0.001 acres). Furthermore, operational activities associated with the approved Project would not change as a result of the proposed changes. Therefore, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no mitigation measures are required.

Impact LU-6: Construction or operation would conflict with a Williamson Act contract.

The proposed changes to the approved Project would traverse the same lands as the approved Project. As with the approved Project, both soil disturbance and presence of construction equipment would be temporary and limited in extent during construction, such that any conflicts with lands under Williamson Act contracts would be minimal. Therefore, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no mitigation measures are required.

Impact LU-7: Construction or operation would result in the physical deterioration of a recreational facility due to increased use.

The proposed changes to the approved Project would not result in an increase in short-term or long-term population growth compared with the approved Project. As such, they would not increase use of recreational facilities. Therefore, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no mitigation measures are required.

Impact LU-8: Construction or operation would disrupt recreational activities such that recreational values would be reduced.

The proposed changes to the approved Project would occur along Segments 2 and 4, where project activities would be located approximately 0.13 mile from AC Dysart Equestrian Park. As with the approved Project, no structures would be located within the park. The proposed changes to the Project would not result in an increase in the disruption to recreational activities. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

C.2.3 Biological Resources

Preconstruction Biological Resources Surveys were completed by SCE in May 2009 (see Figure C.2-1a through C.2-1g). These surveys supplement those completed as part of the Draft EIR, which include the following:

- Vegetation mapping of El Casco Substation site and along linear Project elements, including a 500-foot buffer on each side of the alignment (spring/summer 2005, 2006, and 2007)
- Reconnaissance surveys for vegetation communities (May-June 2007),
- Botanical surveys focused on detecting special management plant species, particularly narrow endemic plant species (NEPS)
- Special management plant surveys during seasonally favorable phases for observing floral diversity in the western Riverside region (April-May 2005)
- Habitat evaluations to demarcate potentially suitable habitat for NEPS, as required by the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)
- Focused surveys for smooth tarplant (*Centromadia pungens* ssp. *laevis*), Nevin's barberry(*Berberis nevinii*), many-stemmed dudleya (*Dudleya multicaulis*), Yucaipa onion (*Allium marvinii*), and round-leaved filaree (*Erodium macrophyllum*) within all proposed limits of disturbance plus a 100-foot buffer (May, June, and August 2007)
- Wildlife surveys focused on avian surveys and habitat assessments for least Bell's vireo and southwestern willow flycatcher (spring and summer 2005 and 2006)
- Habitat assessments for sensitive wildlife (June, July, and September 2007)
- Focused surveys for Los Angeles pocket mouse (*Peregnathus longimembris brevinasus*), San Bernardino kangaroo rat (*Dipodomys merriami parvus*), burrowing owl (*Athene cunicularia*), least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) (spring and summer 2007)
- Site assessment and reconnaissance seining for sensitive fish species along portions of San Timoteo Creek that abut the Project area (August 2007)
- Initial site survey to identify potential jurisdiction water features followed by wetland delineation at locations identified (September 2007).

The vegetation communities identified in the Project area are shown in Draft EIR Figures D.4-1a to D.4-1e.

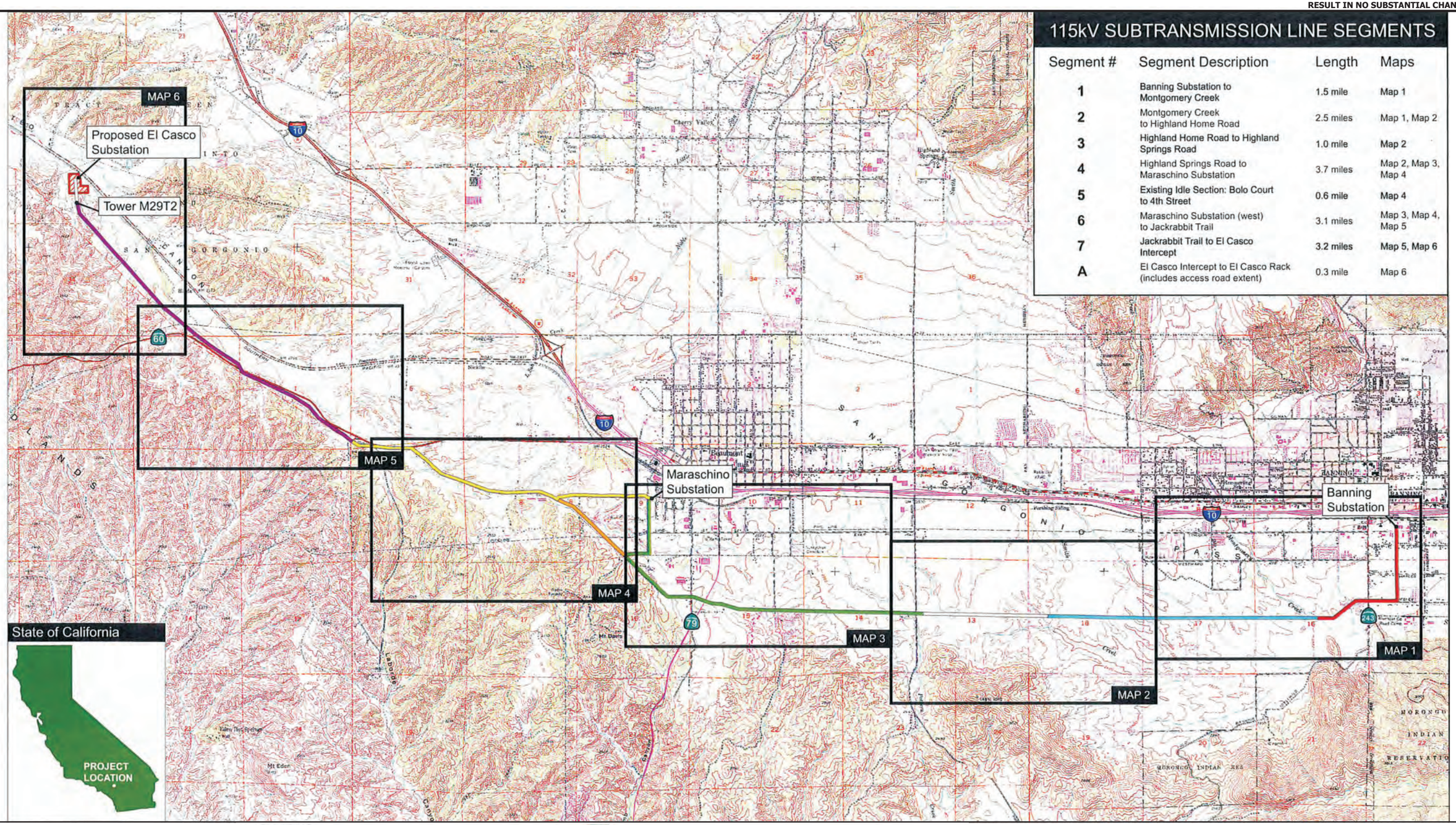
Riparian or Sensitive Natural Communities

Impact B-1: The Project would cause temporary or permanent loss of native vegetation communities.

Under the approved Project SCE would remove the existing H-frame and wooden poles and replace with the new LWS poles and TSPs. As described in the Draft EIR, the new LWS poles and TSPs result in very limited permanent ground disturbance (i.e. the width of the LWS pole and a three to six foot base for the TSP). While the proposed modifications to the Project would double the number of poles along Segments 2 and 4, the overall increase of permanent impacts would be minor, and only the area of temporary disturbance from construction equipment would increase.

115kV SUBTRANSMISSION LINE SEGMENTS

Segment #	Segment Description	Length	Maps
1	Banning Substation to Montgomery Creek	1.5 mile	Map 1
2	Montgomery Creek to Highland Home Road	2.5 miles	Map 1, Map 2
3	Highland Home Road to Highland Springs Road	1.0 mile	Map 2
4	Highland Springs Road to Maraschino Substation	3.7 miles	Map 2, Map 3, Map 4
5	Existing Idle Section: Bolo Court to 4th Street	0.6 mile	Map 4
6	Maraschino Substation (west) to Jackrabbit Trail	3.1 miles	Map 3, Map 4, Map 5
7	Jackrabbit Trail to El Casco Intercept	3.2 miles	Map 5, Map 6
A	El Casco Intercept to El Casco Rack (includes access road extent)	0.3 mile	Map 6



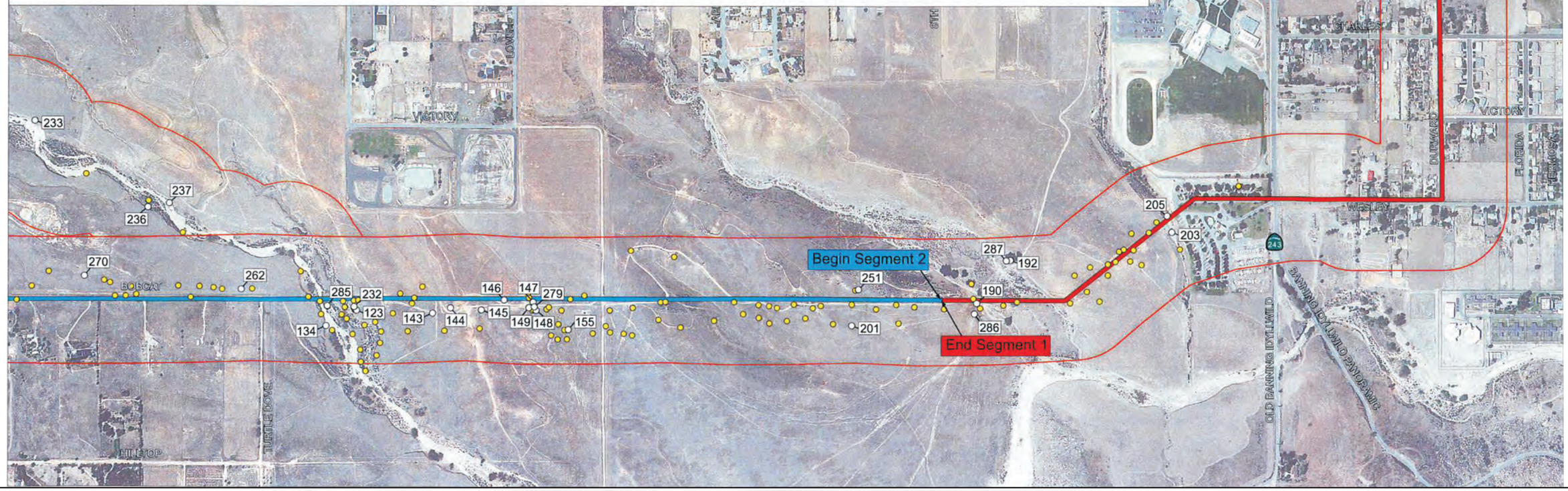
Source: SCE, 2009a.

Figure C.2-1a

Preconstruction Biological Resources Survey Overview Map

Biological Resource Survey Legend

Unique Identifier	Resource Type	Latitude	Longitude	Notes
123	Nest	33.913022	-116.877621	Large to medium nest; no activity
134	Habitat	33.911388	-116.880847	Habitat for Yucaipa Onion and dudleya
143	Habitat	33.91058	-116.883419	L.A. Pocket Mouse Habitat; occupied
144	Nest	33.91143	-116.88361	Bullock's oriole nest
145	Burrow	33.91039	-116.88438	Potential L.A. Pocket Mouse burrow
146	Burrow	33.91050	-116.88447	Potential L.A. Pocket Mouse burrow
147	Burrow	33.91059	-116.88456	Potential L.A. Pocket Mouse burrow
148	Nest Cavity	33.91092	-116.88459	Nesting cavity; occupancy unknown
149	Area	33.91092	-116.884609	Riparian-riverine area in wash
155	Habitat	33.910563	-116.88763	Habitat for Yucaipa Onion and dudleya
190	Burrow	33.90992	-116.89522	Burrowing owl burrow; inactive
192	Burrow	33.91002	-116.89538	Potential burrowing owl burrow; inactive
201	Burrow	33.91040	-116.89614	Large burrow; species unknown
203	Burrow	33.91038	-116.89620	Bullock's oriole nest
205	Habitat	33.910579	-116.896915	Habitat for Yucaipa Onion and dudleya
232	Nest	33.91025	-116.90105	Raven stick nest; no birds observed
233	Habitat	33.910579	-116.901196	Potential L.A. Pocket Mouse habitat
236	Area	33.910672	-116.901559	Riparian-riverine area in wash
237	Habitat	33.910581	-16.901568	Habitat for Yucaipa Onion and dudleya
251	Nest	33.91272	-116.90608	Raven nest; no direct activity
262	Habitat	33.91445	-116.90906	Habitat for Yucaipa Onion and dudleya
270	Habitat	33.910884	-116.913621	Habitat for Yucaipa Onion and dudleya
279	Habitat	33.910835	-116.925172	L.A. Pocket Mouse Habitat; occupied
285	Animal	33.91054	-116.901622	Coastal Whiptail Lizard sighting
286	Animal	33.91033	-116.884576	Coastal Whiptail Lizard sighting
287	Nest	33.91142	-116.88366	Red-tailed Hawk; Active
○	Burrow	refer to table for coordinates		Ground squirrel burrow



LEGEND

Segment 1
Segment 2
Segment 3
Segment 4
Segment 5
Segment 6
Segment 7
Segment A

Proposed El Casco Substation
Existing SCE Substation
State Route
Interstate Highway
500 Foot Buffer Area

0 250 500 1,000 1,500 2,000 Feet

Aspen Environmental Group

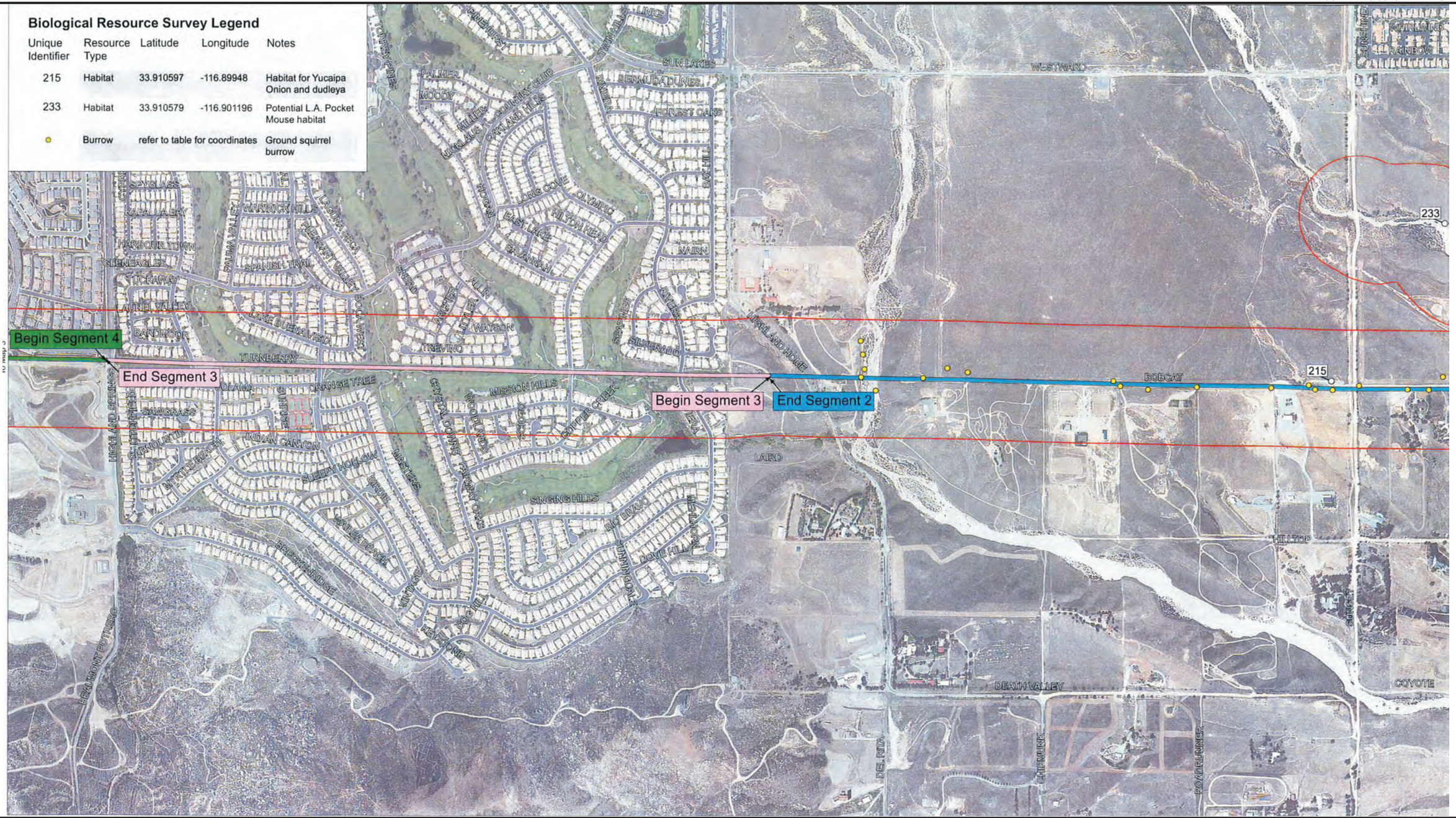
Source: SCE, 2009a.

Figure C.2-1b

Preconstruction Biological Resources Survey Map 1 of 6

Biological Resource Survey Legend

Unique Identifier	Resource Type	Latitude	Longitude	Notes
215	Habitat	33.910597	-116.89948	Habitat for Yucaipa Onion and dudleya
233	Habitat	33.910579	-116.901196	Potential L.A. Pocket Mouse habitat
○	Burrow	refer to table for coordinates		Ground squirrel burrow



LEGEND

Segment 1 · Segment 2 · Segment 3 · Segment 4 · Segment 5 · Segment 6 · Segment 7 · Segment A

Proposed El Casco Substation · Existing SCE Substation · State Route · Interstate Highway · 500 Foot Buffer Area

0 250 500 1,000 1,500 2,000 Feet

Aspen Environmental Group

Source: SCE, 2009a.

Figure C.2-1c

Preconstruction Biological Resources Survey Map 2 of 6

Begin Segment 6

End Segment 4

Maraschino Substation

Biological Resource Survey Legend

Resource ID	Resource Type	Latitude	Longitude	Notes
○	Burrow	refer to table for coordinates		Ground Squirrel Burrow

LEGEND

Segment 1
Segment 2
Segment 3
Segment 4
Segment 5
Segment 6
Segment 7
Segment A

Proposed El Casco Substation
Existing SCE Substation

State Route
Interstate Highway

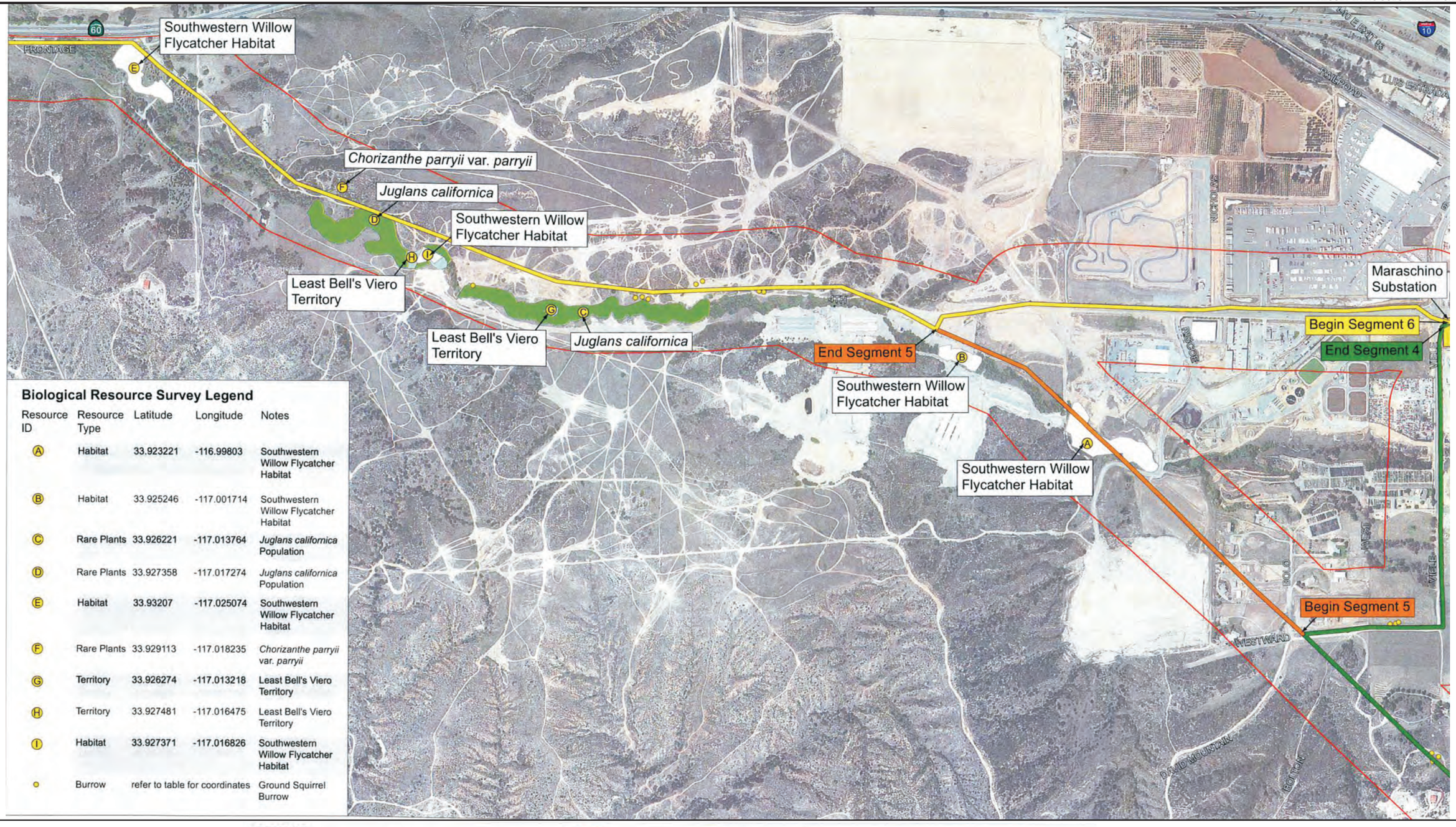
500 Foot Buffer Area

0 250 500 1,000 1,500 2,000 Feet

Source: SCE, 2009a.

Figure C.2-1d

Preconstruction Biological Resources Survey Map 3 of 6



Biological Resource Survey Legend

Resource ID	Resource Type	Latitude	Longitude	Notes
A	Habitat	33.923221	-116.99803	Southwestern Willow Flycatcher Habitat
B	Habitat	33.925246	-117.001714	Southwestern Willow Flycatcher Habitat
C	Rare Plants	33.926221	-117.013764	*Juglans californica* Population
D	Rare Plants	33.927358	-117.017274	*Juglans californica* Population
E	Habitat	33.93207	-117.025074	Southwestern Willow Flycatcher Habitat
F	Rare Plants	33.929113	-117.018235	*Chorizanthe parryii var. parryii*
G	Territory	33.926274	-117.013218	Least Bell's Viero Territory
H	Territory	33.927481	-117.016475	Least Bell's Viero Territory
I	Habitat	33.927371	-117.016826	Southwestern Willow Flycatcher Habitat
	Burrow	refer to table for coordinates		Ground Squirrel Burrow

LEGEND

Segment 1
Segment 2
Segment 3
Segment 4
Segment 5
Segment 6
Segment 7
Segment A
Proposed El Casco Substation
Existing SCE Substation
State Route
Interstate Highway
500 Foot Buffer Area

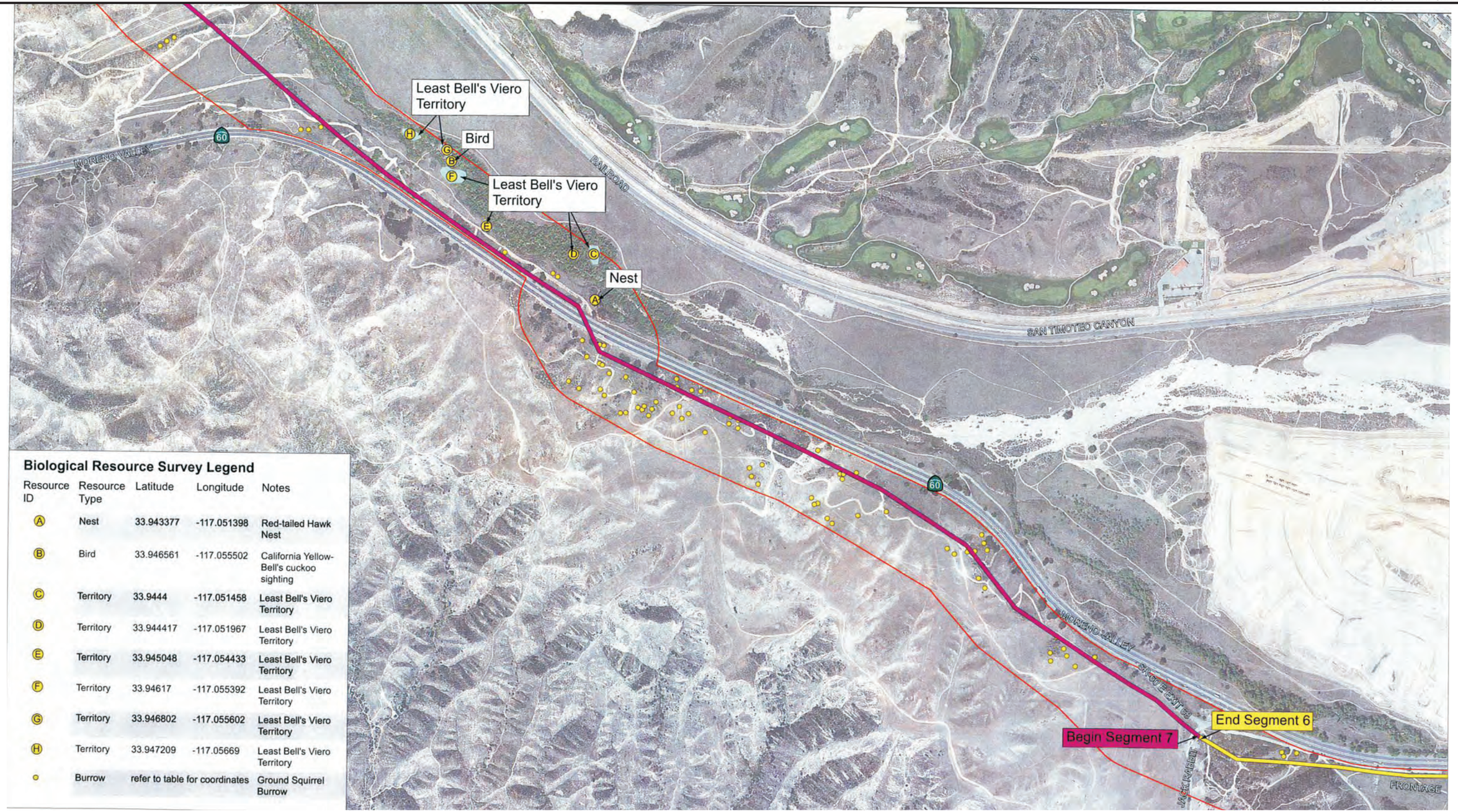
0 250 500 1,000 1,500 2,000 Feet

Aspen Environmental Group

Source: SCE, 2009a.

Figure C.2-1e

Preconstruction Biological Resources Survey Map 4 of 6



Biological Resource Survey Legend

Resource ID	Resource Type	Latitude	Longitude	Notes
A	Nest	33.943377	-117.051398	Red-tailed Hawk Nest
B	Bird	33.946561	-117.055502	California Yellow-Bell's cuckoo sighting
C	Territory	33.9444	-117.051458	Least Bell's Viero Territory
D	Territory	33.944417	-117.051967	Least Bell's Viero Territory
E	Territory	33.945048	-117.054433	Least Bell's Viero Territory
F	Territory	33.94617	-117.055392	Least Bell's Viero Territory
G	Territory	33.946802	-117.055602	Least Bell's Viero Territory
H	Territory	33.947209	-117.05669	Least Bell's Viero Territory
	Burrow	refer to table for coordinates		Ground Squirrel Burrow

LEGEND

Segment 1
Segment 2
Segment 3
Segment 4
Segment 5
Segment 6
Segment 7
Segment A

Proposed El Casco Substation
Existing SCE Substation
State Route
Interstate Highway
500 Foot Buffer Area

0 250 500 1,000 1,500 2,000 Feet

Aspen Environmental Group

Source: SCE, 2009a.

Figure C.2-1f

Preconstruction Biological Resources Survey Map 5 of 6

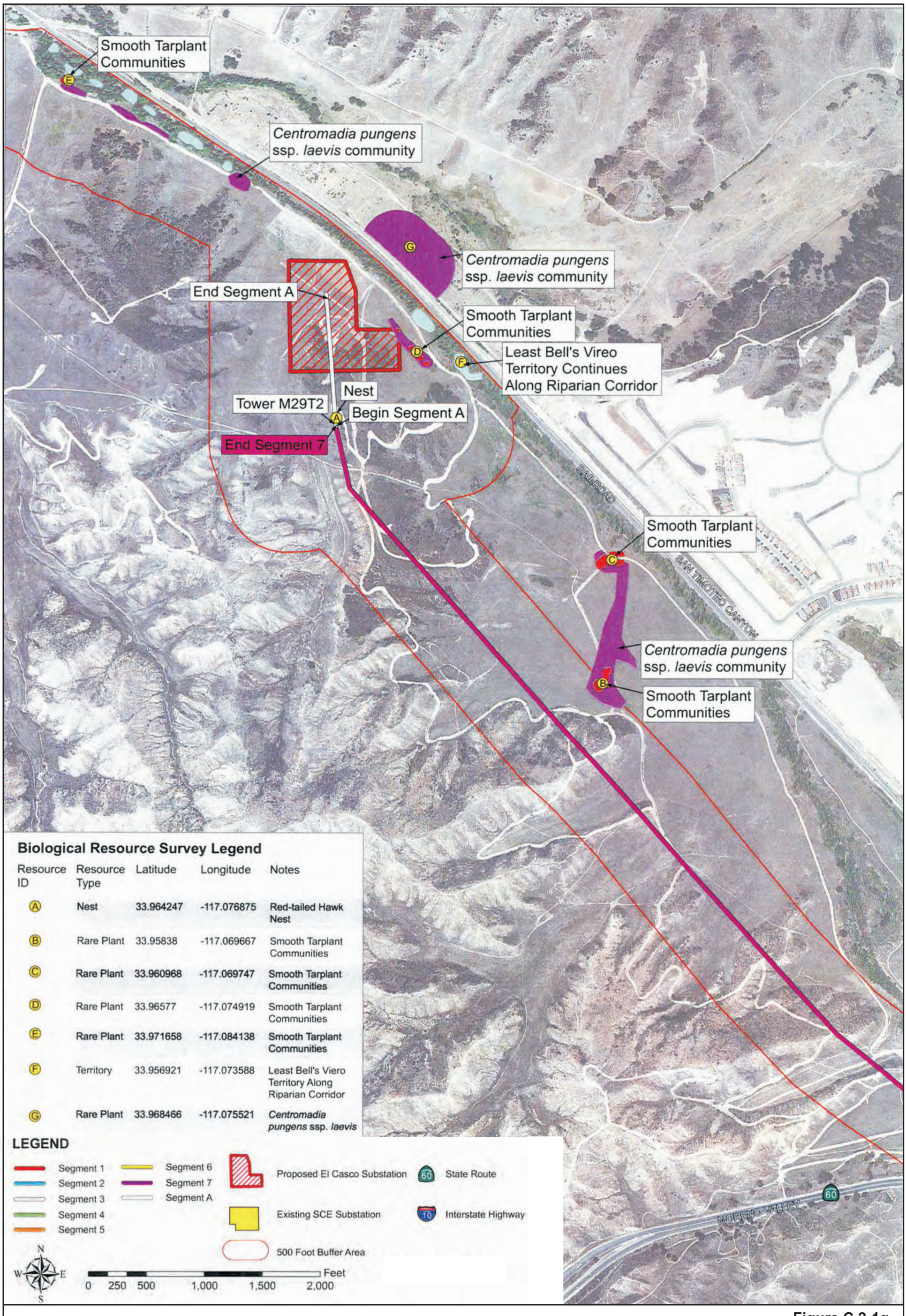


Figure C.2-1g

Preconstruction Biological Resources Survey Map 6 of 6

Aspen Environmental Group

Source: SCE, 2009a.

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The permanent loss of vegetation from implementation of the Project, including the proposed modifications, would be mitigated through application of Applicant Proposed Measures (APMs) BIO-1 and APM BIO-4. In addition, potential impacts to native vegetation would be reduced through implementation of Mitigation Measure B-1a (Prepare and Implement a Habitat Restoration/ Compensation Plan) and B-1b (Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance). As such, no new or substantially more severe impacts would occur as a result of the changes to the Project, and no additional mitigation measures are required.

Impact B-2: The Project would cause loss of foraging or breeding habitat for wildlife.

As described in the Draft EIR, installation of new tower locations would result in minimal habitat loss as the towers are small and temporary impacts from grading would be restored at the completion of construction. The additional poles required in Segments 2 and 4 would only slightly increase the total acreage of permanent Project disturbance. No new or substantially more severe impacts related to the loss of foraging or breeding habitat for wildlife would occur as a result of the changes to the Project, and no additional mitigation is required.

Impact B-3: The Project would introduce non-native and invasive plant species.

The introduction and spread of non-native plant species normally occurs when vehicles or equipment exposed to populations of noxious weeds in one geographic area inadvertently transport the seeds to another area where lands have been disturbed. With the introduction of additional poles along Segments 2 and 4, the potential for the Project to temporarily remove habitat at each tower location, thereby increasing the potential for the introduction or spread of non-native plant species, would increase proportionally. Implementation of Mitigation Measures B-1a (Prepare and Implement a Habitat Restoration/ Compensation Plan), B-3a (Implement Weed Control Measures), and B-3b (Landscape with Native or Non-invasive Plant Species) would reduce impacts from the potential introduction of non-native plant species to below the level of significance, regardless of this proportional increase. As such, the proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Wildlife

Impact B-4: The Project would result in a loss of nesting birds.

Ground-disturbing activity, including the installation of LWS and TSPs, has the potential to disturb vegetation utilized by wildlife, including nesting birds. With the additional structures along Segments 2 and 4, this potential could increase. However, as described in the Draft EIR, SCE's participation in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) would mitigate impacts to most nesting birds. To further reduce potential impacts to nesting birds and raptors, SCE would implement APM BIO-2 which requires scheduling major ground disturbance outside the breeding season for nesting birds (generally between September 1 and January 31). In addition, Mitigation Measure B-4 (Conduct Pre-construction Surveys and Monitoring for Breeding Birds) is required. As such, the proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Impact B-5: The Project would result in permanent disturbance to wildlife at the proposed El Casco Substation site due to noise and increased human presence.

The proposed changes to the Project do not affect the El Casco Substation site.

Endangered or Threatened Species, or Proposed or Critical Habitat - Vegetation

Impact B-6: Construction activities would result in indirect or direct loss of listed plants.

Ground-disturbing activity associated with the Project, including the proposed changes, has the potential to disturb either individual plants or populations of listed plant species should they be present in the Project area. To reduce potential impacts to listed plant species SCE would implement APMs BIO-1 and BIO-4 and Mitigation Measure B-6 (Conduct Surveys for Sensitive Plant Species and Flag for Avoidance), which would reduce impacts, including impacts from the proposed changes, to below the level of significance. As such, the proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Endangered or Threatened Species, or Proposed or Critical Habitat - Wildlife

Impact B-7: Construction activities would result in indirect or direct loss of Quino Checkerspot habitat.

Implementation of the proposed changes to the Project would result in slightly increased temporary and permanent impacts to habitat potentially utilized by the Quino Checkerspot butterfly. Potential indirect effects to the species could also occur from the spread of noxious or invasive weeds that degrade habitat utilized by this species. However, to date, this species has not been observed in the Project area. Additionally, according to the recent USFWS five-year review, no new occurrences of this species have been identified in the Project area since the preparation of the Draft EIR was completed (USFWS, 2009). Impacts to this species would be fully mitigated through SCE's participation in the MSHCP. Implementation of APM BIO-4 and Mitigation Measures B-1a (Prepare and Implement a Habitat Restoration/Compensation Plan), B-1b (Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance), and B-3 (Implement Weed Control Measures) would reduce potential impacts to this species. Therefore, the proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Impact B-8: The Project would result in habitat loss or disturbance to listed birds, including migratory birds and raptors.

Ground-disturbing activity, such as the placement of LWS and TSPs, has the potential to disturb vegetation utilized by wildlife. While the amount of ground-disturbing activities associated with the Project would increase slightly with the additional poles along Segments 2 and 4, the total area of disturbance would remain very low. Furthermore, existing conditions along many sections of the ROW (i.e. urban development) limit the potential for many listed birds. To reduce potential impacts to nesting birds and raptors SCE would implement APM BIO-2 and Mitigation Measure B-4 (Conduct Pre-construction Surveys and Monitoring for Breeding Birds). Therefore, the proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Endangered or Threatened Species, or Proposed or Critical Habitat - Mammals

Impact B-9: The Project would result in the electrocution of listed bird species.

As described in the Draft EIR, the majority of raptor electrocutions are caused by lines that are energized at voltage levels less than 69 kV (APLIC, 2006; Manville II2, 2005). The Project's voltage level is 115 kV, which would not change as a result of the proposed changes. The likelihood of electrocution would be low based on SCE's commitment to construct raptor-safe LWS and TSPs (see APM BIO-14) and with implementation of Mitigation Measure B-9 (Construct to 2006 APLIC Guidelines). No new or substantially more severe impacts related to the electrocution of listed bird species would occur as a result of the changes to the Project, and no additional mitigation is required.

Impact B-10: The Project would result in subtransmission line collisions by listed bird species.

As described in the Draft EIR, most of the listed species present in the Project area are Covered Species under the MSHCP and impacts of the Project would be fully mitigated through compliance with the MSHCP. In addition, the 115 kV subtransmission line, including the proposed changes, would replace existing lines such that general conditions would not substantially change from existing conditions. The new towers would be taller; however, the LWS poles would not be as tall as the originally proposed TSPs, and the line would be constructed utilizing line-collision avoidance technology. Implementation of Mitigation Measure B-10 (Utilize Collision-Reducing Techniques) would minimize the potential for line collisions by listed and sensitive bird species. No new or substantially more severe impacts related to subtransmission line collisions by listed bird species would occur as a result of the changes to the Project, and no additional mitigation is required.

Candidate, Sensitive, or Special-Status Species - Vegetation

Impact B-11: The Project would result in the loss of special-status plant species.

Construction-related impacts to sensitive plant species from the proposed changes would be the same as described above for Impact B-6 for listed plant species. Ground-disturbing activity, such as tower pad preparation and construction, tower removal, and use or improvement of existing access roads has the potential to disturb sensitive plant species. Indirect impacts can include the spread of noxious or invasive weeds. These activities and associated potential to impact special-status plant species would increase slightly with the additional poles installed as part of the proposed changes to the Project. This impact would be mitigated through implementation of APMs BIO-1 and BIO-4, as well as Mitigation Measures B-1a (Prepare and Implement a Habitat Restoration/Compensation Plan), B-1b (Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance), B-3a (Implement Weed Control Measures), and B-6 (Conduct Surveys for Sensitive Plant Species and Flag for Avoidance). As such, the proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Candidate, Sensitive, or Special-Status Species - Wildlife

Impact B-12: Construction activities would result in indirect or direct loss of individuals, or a direct loss of habitat for sensitive wildlife.

Implementation of the proposed changes to the Project would not change the 115 kV subtransmission line alignment (i.e., Project route). As described in the Draft EIR, sensitive invertebrate species were

not observed along the Project route. Fish considered protected by the CDFG or MSHCP are not expected to occur in the Project area. The only special-status amphibian known to occur in the Project area is the western spadefoot toad. Spadefoot toads are a Covered Species under the MSHCP and impacts to this species are fully mitigated through APM BIO-4 (SCE Compliance with MSHCP Requirements) and Mitigation Measure B-1b (Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance). No new or substantially more severe impacts related to the indirect or direct loss of individuals, or a direct loss of habitat for sensitive wildlife would occur as a result of the changes to the Project, and no additional mitigation is required.

Impact B-13: The Project would result in the loss of special-status reptile species.

Implementation of the proposed changes to the Project would not change the Project area, as the additional poles along Segments 2 and 4 would be located within the same ROW as the approved Project. Many of the special-status reptile species occurring in the Project area are covered under the MSHCP, and impacts would be mitigated through SCE's participation in the MSHCP program. Additionally, the following mitigation measures would reduce impacts to sensitive reptiles not covered by the MSHCP: Mitigation Measure B-1a (Prepare and Implement a Habitat Restoration/Compensation Plan), B-3a (Implement Weed Control Measures), B-13a (Conduct Pre-Construction Surveys and Relocate Sensitive Reptiles), and B-13b (Monitor and Relocate Species during Grading of Substation). The proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Impact B-14: The Project would result in the loss of burrowing owls.

The proposed changes to the Project would occur within the approved Project's ROW. One inactive burrowing owl burrow was identified just east of the eastern extent of Segment 2 during pre-construction surveys conducted in May 2009. However, no active burrows or owls were observed. If burrowing owls are present within a construction zone, or adjacent to such an area, disturbance could destroy occupied burrows or cause the owls to abandon their burrows. Construction during the breeding season could also result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. However, the proposed changes to the Project would not substantially increase the likelihood of an impact with implementation of APM BIO-4 which requires MSHCP compliance, as burrowing owls are a Criteria Species under the MSHCP. The CPUC would monitor compliance with this act through the implementation of Mitigation Measure B-1b (Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance). The proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Impact B-15: The Project would result in the loss of foraging habitat or disruption of nesting for special-status raptor species.

As described in the Draft EIR, numerous special-status raptor species have the potential to occur in the Project area. Pre-construction surveys conducted in May 2009 identified one active red-tail hawk nest located within 500 feet of Segment 2, along with several raven nests. The proposed changes to the Project would occur within the approved Project's ROW, where impacts to foraging habitat along Segments 2 and 4 could increase as a result of the additional poles. The amount of foraging habitat that would be impacted by the proposed changes to the Project represents a small fraction of the foraging habitat available in adjacent areas and region-wide. Therefore implementation of the changes to the proposed Project would not result in a substantial increase in the severity of this impact. Furthermore, this impact would be mitigated through implementation of APMs BIO-2 and BIO-4, as well as

Mitigation Measure B-4 (Conduct Pre-Construction Surveys and Monitoring for Breeding Birds). Therefore, the proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Impact B-16: The Project would result in electrocution of special-status bird species.

As discussed in the Draft EIR, the majority of raptor electrocutions are caused by lines that are energized at voltage levels between 1 kV and 69 kV and "the likelihood of electrocutions occurring at voltages greater than 69 kV is extremely low" (APLIC, 1996). The Project's voltage level is 115 kV, which would not change as a result of the proposed changes. Implementation of Mitigation Measure B-9 (Construct to 2006 APLIC Guidelines) would reduce this impact. Therefore, no new or substantially more severe impacts related to the electrocution of listed bird species would occur as a result of the changes to the Project, and no additional mitigation is required.

Impact B-17: The Project would result in subtransmission line collision by special-status bird species.

The 115 kV subtransmission line, including the proposed changes, would replace existing lines such that existing conditions would not substantially change. The new towers would be taller; however, the LWS poles would not be as tall as the originally proposed TSPs, and the line would be constructed utilizing line-collision avoidance technology. Implementation of Mitigation Measure B-10 (Utilize Collision-Reducing Techniques) would minimize the potential for line collisions by special-status bird species. No new or substantially more severe impact would occur as a result of the changes to the Project, and no additional mitigation is required.

Candidate, Sensitive, or Special-Status Species - Mammals

Impact B-18: The Project would result in the loss of the American badger.

As described in the Draft EIR, habitat for the American badger is present throughout the Project area. Project implementation would not substantially reduce available foraging/denning habitat, even with the additional poles along Segments 2 and 4. While construction activities including clearing and grading of tower sites could result in impacts to badgers if they are present in the Project alignment, Mitigation Measure B-18 (Avoid Active Burrows or Nests and Relocate during the Non-Breeding Season) would reduce this impact. The proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Impact B-19: The Project would result in loss of special-status rodent species.

As described in the Draft EIR, several sensitive rodent species have the potential to occur in sections of the proposed ROW. These include the Los Angeles pocket mouse, San Diego pocket mouse, and San Diego desert wood rat. Some of these species, including the two species of pocket mouse, are known to occur in the wash habitat at Smith Creek, which is crossed by Segment 2. The proposed changes would result in a greater number of poles along Segment 2; however, pole locations have been situated to avoid wash habitat that supports these species. To further reduce impacts to special-status rodent species, SCE would implement APM BIO-4 which requires MSHCP compliance. The CPUC would monitor compliance with this act through the implementation of Mitigation Measure B-1b (Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance). In addition, Mitigation Measures B-18 (Avoid Active Burrows or Nests and Relocate during the Non-Breeding Season) and B-

19 (Avoid Burrow Areas) would further reduce this impact. Therefore, the proposed changes to the Project would not result in a new or substantially more severe impact, and no additional mitigation is required.

Jurisdictional Waters and Wetlands

Impact B-20: The Project would result in the loss of jurisdictional waters and wetlands.

The proposed changes to the Project would not alter the alignment of the 115 kV subtransmission line, and the same waterways would continue to be crossed. As required by law, SCE would comply with the regulations regarding conducting Project activities in water bodies under the jurisdiction of the State and federal government. As such SCE would obtain required permits pursuant to Section 401 and 404 of the CWA and the State Porter-Cologne Act and CDFG Code 1602. SCE would also comply with the provisions of the MSHCP regarding avoidance and minimization of impacts to riparian areas. Mitigation Measures B-1a (Prepare and Implement a Habitat Restoration/Compensation Plan) and B-1b (Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance) would further reduce this impact. No new or substantially more severe impact would occur as a result of the changes to the Project, and no additional mitigation is required.

Movement of Fish, Wildlife Movement Corridors, or Native Wildlife Nursery Sites

Impact B-21: The Project would result in the loss or restriction of habitat connectivity in Constrained Linkage 22.

Although the Project would continue to span riparian or wash habitat, the currently proposed design of the 115 kV subtransmission line intentionally avoids impacts associated with movement along substantial wildlife corridors in the Project area. Specifically, TSPs would be utilized in Segments 2 and 4 to allow for larger span crossing of existing drainages. Additionally, electrical subtransmission lines have very limited footprints and do not result in a physical barrier to wildlife movement. As such, impacts from the subtransmission line would remain less than significant. Therefore, no new or substantially more severe impact would occur as a result of the changes to the Project, and no new mitigation is required.

Conflict with Local Policies or Ordinances Protecting Biological Resources

Impact B-22: The Project would conflict with the MSHCP.

Implementation of APM BIO-4 requires MSHCP compliance and Mitigation Measure B-1b (Provide Documentation of Regulatory Permit Acquisition and MSHCP Compliance) further ensures that SCE will not be in conflict. The proposed changes to the Project would not affect SCE's compliance with the MSHCP, and no additional mitigation is required.

C.2.4 Cultural Resources

Impact CR-1: Project construction has the potential to affect known archaeological resources.

As described in the Draft EIR, subtransmission line construction (including the relocation/replacement of existing wood poles) is considered to pose a low risk of disturbance for any known archaeological

resources in the area. The Project changes would include additional poles along Segments 2 and 4 of the 115 kV subtransmission line route, but would not change the probability of encountering archaeological resources as Project changes would be located along the same route as the approved Project. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact CR-2: Unanticipated archaeological discoveries may be damaged or destroyed during project construction.

Unknown and potentially significant cultural resources could exist within areas of ground disturbance during construction of the subtransmission line. The proposed changes to the approved Project in Segments 2 and 4 of the subtransmission route would not change the potential for unanticipated cultural resource discoveries. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact CR-3: Project construction would affect significant paleontological resources.

Subtransmission line construction, including the installation of additional poles along Segments 2 and 4, is considered to pose a low risk of disturbance for any known or unanticipated resources in the area. Furthermore, ground disturbance associated with the 115 kV subtransmission line would be limited to 24- to 30-inch diameter bore holes approximately 10 to 12 feet deep, such that impacts to paleontological resources are anticipated to be minimal. Although new ground disturbance would be introduced and slightly increase the chances of encountering paleontological resources, the proposed changes would not change the significance of the Project's impact. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no mitigation measures are required.

C.2.5 Geology and Soils

Impact GEO-1: Construction activities would cause slope instability.

The proposed changes to the approved Project would slightly increase the chances of encountering slope instability. However, the proposed changes would follow the same APMs and mitigation measures of the approved Project and would not increase the significance of the approved Project's impact. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact GEO-2: Construction activities would accelerate erosion.

The installation of additional poles within Segments 2 and 4 of the approved 115 kV subtransmission line alignment would introduce new ground disturbing activities and slightly increase the potential of erosion. However, these activities would follow the same mitigation and protection measures as the approved Project. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact GEO-3: Project structures would be damaged by corrosive soils.

The proposed changes to the approved Project would slightly increase the chances of encountering corrosive soils due to the installation of additional poles. However, the proposed changes would follow

the same APMs and mitigation measures of the approved Project and would not increase the significance of the approved Project's impact. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact GEO-4: Project structures would be damaged by unstable soils, landslides, earthflows, and/or debris flows.

The proposed changes to the approved Project would slightly increase the chances of encountering landslides due to the installation of additional poles. However, the proposed changes would occur in the same ROWs, follow the same APMs and mitigation measures of the approved Project, and would therefore not increase the significance of the approved Project's impact. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact GEO-5: Project structures would be damaged by seismically induced groundshaking and ground failure, including liquefaction and lateral spreading.

The proposed changes to the approved Project would slightly increase the chances of structures being damaged by seismically induced groundshaking and ground failure, including liquefaction and lateral spreading, due to the installation of additional poles along the approved 115 kV alignment. However, the proposed changes would follow the same APMs and mitigation measures of the approved Project and would not increase the significance of the approved Project's impact. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact GEO-6: Project structures would be damaged by surface fault rupture at crossings of active and potentially active faults.

The proposed changes to the approved Project include the installation of additional poles within Segments 2 and 4 of the 115 kV subtransmission line alignment, where Segment 4 crosses two traces of the Beaumont Plain Fault Zone. As such, the installation of additional poles increases the chance that project structures would be damaged by surface fault rupture. However, the proposed changes would follow the same APMs and mitigation measures of the approved Project and would not increase the significance of the approved Project's impact. Therefore, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact GEO-7: Expansive, soft, loose and/or compressible soils would damage Project structures.

The proposed changes to the approved Project would slightly increase the chances of disturbing problematic soils due to the installation of additional poles. However, the proposed changes would follow the same APMs and mitigation measures of the approved Project and would not increase the significance of the approved Project's impact. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

C.2.6 Hazards and Hazardous Materials

Impact HAZ-1: The Project would create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.

Additional poles constructed within Segments 2 and 4 would increase the overall amount of construction work associated with the Project, including an increase in daily worker and construction-related vehicle trips related to the 115 kV subtransmission line. This would result in a slight increase in the amount of vehicle fuel and oil for construction equipment used when compared to that analyzed in the Draft EIR. As discussed in the Draft EIR, to minimize the potential for spills or releases of hazardous and flammable materials used during construction, SCE and its contractors would implement Best Management Practices (BMPs) that include preparation of a Spill Prevention, Control, and Countermeasures Plan (SPCC) and a Stormwater Pollution Prevention Plan (SWPPP). Furthermore, Mitigation Measures HAZ-1a (Environmental Training and Monitoring Program), HAZ-1b (Proper Disposal of Construction Waste), and HAZ-1c (Emergency Spill Supplies and Equipment) would continue to be implemented as part of the Project. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HAZ-2: The Project would create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Additional poles constructed within Segments 2 and 4 would slightly increase the overall risk that hazardous materials could accidentally be released during construction. In addition, the installation of additional pole footings would slightly increase the risk of contaminated soils being disturbed or excavated during construction resulting in a potential health risk to construction workers and/or the public through airborne or physical exposure to contaminants. In the event any construction activity resulted in site contamination that required action, California Occupational Safety and Health Administrations (OSHA) rules would require a site-specific Health and Safety Plan to be prepared and implemented by SCE and its contractors to minimize exposure of construction workers to potential site contamination and to dispose of construction-generated waste soil in accordance with local, State, and federal regulations. Additionally, best management practices (BMPs) described in APM HAZ-1 and Mitigation Measures HAZ-1a (Environmental Training and Monitoring Program), HAZ-1b (Proper Disposal of Construction Waste), and HAZ-1c (Emergency Spill Supplies and Equipment) would implemented as part of the Project. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HAZ-3: The Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The proposed changes to the approved Project would occur within the approved Project ROW and not result in any additional schools being located within 0.25 mile of the Project. No new impacts would occur and no additional mitigation measures would be needed.

Impact HAZ-4: The Project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

While additional poles would be constructed within Segments 2 and 4, they would occur within the approved Project ROW and not result in any additional project footprint outside of that analyzed in the Draft EIR. Therefore, no new impacts regarding the possibility that contamination from known hazardous material sites disrupted by Project construction creating a hazard to the public would occur.

Impact HAZ-5: For a project located with two miles of a public airport, would the project result in a safety hazard for people residing or working in the project area.

Banning Municipal Airport is located approximately 1.2 miles east of Segment 2. As shown in Figure B-3, the LWS poles to be installed in Segments 2 and 4 range from 75 to 105-feet tall (average of 80 feet), whereas the existing wood poles range in height from 60 to 75-feet tall. The TSPs proposed within Segments 2 and 4 would be slightly taller, ranging in height from 75 to 120-feet (average of 85 feet). According to Federal Aviation Regulations, Part 77, Section 77.23 (a)(2), an existing or future object would be an obstruction to air navigation if it is of greater height than 200 feet above ground level within three nautical miles of an airport. Therefore, since the features of the Project continue to be less than 200 feet above ground level, the Project would continue to have no impact on aviation activities at the Banning Municipal Airport. Furthermore, the proposed changes to the approved Project would not impact the San Bernardino International Airport or the Redlands Municipal airport, both of which are located one mile and one half mile, respectively, from the northwestern portion (along East San Bernardino Avenue) of the fiber optic system which is not changing from what was originally approved. Therefore, the proposed changes would not result in a new or substantially more severe safety hazard for people residing or working in the project area.

Impact HAZ-6: The Project would result in a safety hazard related to a private airstrip for people residing or working in the Project area.

There are no private airstrips located within at least three miles of the approved Project route, which would not change as a result of the proposed modifications to the Project. Therefore, no impact related to aviation safety hazards and private air strips would occur.

Impact HAZ-7: The Project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The increase in poles within Segments 2 and 4 would occur within the approved Project ROW and would not result in any new roadway crossings. Furthermore, while the additional poles would result in an increase in construction vehicle trips and routes, these construction-related trips (including any oversize vehicle trips) would not result in any additional temporary road or lane closures that could restrict emergency vehicle response. Therefore, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HAZ-8: The Project would expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Segments 2 and 4 are located within a low fire probability zone; therefore, additional construction associated with the increase in poles within Segments 2 and 4 is not expected to add to potential wildland fire risk. Regarding Project operations, as shown in Figure B-3, updated heights for TSPs range from 75 to 120-feet tall (average of 85 feet) and LWS poles range from 75 to 105-feet tall (average of 80 feet). This increase in structure height and associated subtransmission line height within Segments 2 and 4, coupled with additional poles, is not anticipated to increase the overall operational wildland fire hazard potential of the Project. As such, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

C.2.7 Hydrology and Water Quality

Impact HYD-1: Soil erosion and sedimentation caused by construction activities would degrade water quality.

Construction of roughly twice as many poles along Segments 2 and 4, the majority of which would be LWS poles, would result in only a slight increase in ground disturbance overall, as the area of disturbance for the installation of each LWS pole is less than for the originally proposed and approved TSPs. Furthermore, the changes to the approved Project would not require additional road improvements or staging areas, and all additional poles would be located within existing SCE ROW. With implementation of the APMs and mitigation measures previously identified, the additional poles would not change the nature or magnitude of potential impacts associated with the effects of soil erosion and sedimentation on water quality. No new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HYD-2: Degradation of surface water or groundwater quality would occur from the accidental release of potentially harmful materials during construction activities.

Doubling the number of poles in Segments 2 and 4 would require additional construction equipment and vehicles, as identified in Table B-1. This slightly increases the potential for the accidental release of potentially harmful materials at pole installation locations, site laydown and preparation areas, and other locations where construction activities would occur, which could impact surface water and groundwater quality. However, implementation of the APMs and mitigation measures previously adopted would ensure that the severity of potential water quality impacts resulting from accidental release of harmful materials would not substantially increase. Therefore, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HYD-3: Degradation of surface water or groundwater quality would result from the accidental release of potentially harmful materials during operational active.

Installation of the additional 115 kV poles along Segments 2 and 4 would occur within existing SCE ROW, as with the approved Project, and would not introduce any new operational requirements. No

new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no mitigation measures are required.

Impact HYD-4: Disturbance of existing groundwater resources.

Additional excavation activities would result from the installation of a greater number of subtransmission line pole foundations. As with the approved Project, if groundwater is encountered, construction activities would have the potential to degrade water quality through introduction of contaminants such as soils, drilling fluids, and chemicals used during construction. However, the majority of the new poles would be LWS poles, which require less excavation than the originally proposed TSPs, and implementation of the APMs and mitigation measures previously identified would ensure that the nature and magnitude of potential groundwater impacts would not change. Therefore, no new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HYD-5: Increased runoff from the creation of new impervious areas.

Construction of additional poles would require scraping and grading, as well as installation of concrete foundations and pavement in some areas. However, no additional road improvements or staging areas would be required, and the impervious areas associated with new foundations would not alter the nature or magnitude of potential impacts to increased runoff. No new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HYD-6: Runoff introduced as a result of permanent Project features would cause the overloading of a local stormwater drainage system.

Subtransmission pole foundations would not substantially increase runoff and would, therefore, not contribute substantial runoff to the local drainage system. No new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HYD-7: Transmission towers or other above-ground project features located in a floodplain or watercourse could result in flooding, flood diversions, or erosion.

The placement of additional poles in areas subject to flooding, or within proximity of an existing watercourse, would not result in a diversion of flows or increased flood risk for adjacent properties. Furthermore, no additional poles associated with the changes to the approved Project would be situated in a watercourse. Implementation of the APMs and mitigation measures previously adopted would ensure that the nature and magnitude of potential impacts associated with flooding and flood diversions would not change. No new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HYD-8: Result in damage from inundation by tsunami, seiche, or mudflow.

No infrastructure associated with changes to the approved Project would be located near the coast or be subject to any tsunami hazards. No new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

Impact HYD-9: Expose people or structures to flooding as a result of failure of a levee or dam.

No infrastructure associated with changes to the approved Project would have the potential to cause the failure of a levee or dam. No new or substantially more severe impacts would occur as a result of the changes to the approved Project, and no new mitigation measures are required.

C.2.8 Noise

Impact N-1: Construction activities would temporarily increase local noise levels, impacting sensitive receptors and exceeding applicable noise regulations.

The increase in poles within Segments 2 and 4 would result in additional site-specific construction locations within the Project ROW subject to temporary noise increases from construction equipment, which could impact sensitive receptors and exceed applicable noise regulations. However, construction of the LWS poles, which represent the majority of the new poles, would be less intense than construction of the TSPs which would be built under the currently approved Project. As such, the maximum intermittent construction noise levels (84 to 96 dBA at 50 feet) and continuous noise levels (up to 77 dBA at 50 feet), as analyzed in the Recirculated Draft EIR, would not noticeably increase as result of the proposed changes to the Project. A greater number of construction vehicle trips and travel routes would also be required to accommodate the additional poles. Off-site noise associated with these additional trips and travel routes would result in more events where ambient noise levels would increase for short durations as vehicles pass and could impact a greater number of sensitive receptors along the travel routes. However, with implementation of APMs NOISE-1 through NOISE-3 temporary construction noise impacts (on-site and off-site) would be minimized to a less-than-significant level. As such, no new or substantially more severe temporary construction noise impacts would occur as a result of the changes to the Project, and no mitigation measures are required.

Impact N-2: Ground-borne vibration could cause a temporary nuisance during construction.

As discussed in Impact N-1, the increase in poles within Segments 2 and 4 would result in additional site-specific construction locations within the Project ROW and increased construction vehicle trips and routes. These additional stationary and mobile construction equipment sources could increase the overall number of receptors potentially subject to short-term construction equipment vibration. However, construction of the LWS poles, which represent the majority of the new poles, would be less intense than construction of the TSPs which would be built under the currently approved Project. As such, short-term construction vibration would not noticeably increase as result of the proposed changes to the Project. Furthermore, implementation of APMs NOISE-1 through NOISE-3 would reduce temporary construction vibration impacts at all construction sites and construction vehicle routes. As such, no new or substantially more severe temporary construction vibration impacts would occur as a result of the changes to the Project, and no mitigation measures are required.

Impact N-3: Noise from operation of the overhead subtransmission line.

As shown in Figure B-3, updated heights for TSPs range from 75 to 120-feet tall (average of 85 feet) and LWS poles range from 75 to 105-feet tall (average of 80 feet). The original design was based on structure heights ranging from 65 to 85 feet tall. This increase in line height would not substantially change the calculated operational corona discharge noise levels presented in Recirculated Draft EIR

Figure D.9-3. Despite the proposed changes within Segments 2 and 4, corona noise from Project operation in the vicinity of residential areas would not exceed current ambient noise levels adjacent to the ROW, and therefore would be in compliance with the various local general plan standards and noise ordinances. As such, no new or substantially more severe operational corona noise impacts would occur, and no mitigation measures are required.

Impact N-4: Noise from inspection and maintenance activities.

While additional poles would exist within Segments 2 and 4 with implementation of the proposed changes to the Project, inspections and maintenance activities associated with the Project are not expected to increase beyond the inspections and maintenance analysis presented in the Final EIR and the level that is currently required within the ROW. Any noise associated with inspections and maintenance would be temporary and short term, and conducted in accordance with all applicable noise regulations. As such, no new or substantially more severe operational inspection and maintenance noise impacts would occur as a result of the changes to the Project and no mitigation measures are required.

C.2.9 Public Services and Utilities

Impact U-1: Utility system disruptions.

The additional poles constructed within Segments 2 and 4 would be built within the existing approved Project ROW and would not substantially increase the potential for encountering buried utility lines. As discussed in the Draft EIR, SCE is required to probe for existing buried utilities prior to any excavation work. After probing within the corridor for existing utilities, exact placement of the pole foundations would be determined so that they would not conflict with other co-located utilities. Mitigation Measure U-1a (Notification of Utility Service Interruption) would continue to be implemented as part of the Project, reducing any potential for utility system disruptions. As such, no new or substantially more severe utility system disruption impacts would occur as a result of the changes to the Project, and additional mitigation measures are not required.

Impact U-2: Require the need for new or physically altered public service facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

Additional poles constructed within Segments 2 and 4 would slightly increase the overall amount of construction work associated with the Project; however, no new construction methods or work outside the approved Project ROW would result from these changes. As analyzed in the Draft EIR, the service capacities of local fire departments would not be affected by the Project with implementation of Mitigation Measures HAZ-8a through HAZ-8d; impacts to emergency vehicle response would be mitigated with implementation of Mitigation Measure T-3; and neither construction nor operation of the Project would result in an increase in the local population. Therefore, the need for new or alteration of existing public service facilities would not increase from that of the approved Project, Therefore, no new or substantially more severe demands to public services or utilities providers would occur as a result of the changes to the Project, and mitigation measures are not required.

Impact U-3: Project-required utility and public service demands.

The proposed changes to the Project would not substantially increase the demand on utility and public service providers. The increase in construction activities would not result in a noticeable increase in the

amount of water required for foundation construction or other activities. Furthermore, increased runoff from the creation of new impervious areas by the addition of a great number of foundations would continue to amount in little change in the overall amount of stormwater runoff resulting from the Project to wastewater treatment providers. No increase to the amount of solid waste generated is expected to occur from the additional poles within Segments 2 and 4. As such, no new or substantially more severe demands to utility or public service providers would occur as a result of the changes to the Project.

C.2.10 Transportation

Impact T-1: Temporary road and lane closures.

The increased number of poles within Segments 2 and 4 would occur within the approved Project ROW and would not result in any new roadway crossings from those analyzed in the Draft EIR. While there would be an increase in construction vehicle trips and travel routes, these construction-related trips (including any oversize vehicle trips) would not result in any additional temporary road or lane closures, as they would merely provide equipment and workers to the additional pole construction sites. As such, no new or substantially more severe impacts related to temporary road and travel lane closures would occur as a result of the changes to the Project.

Impact T-2: Traffic generated by construction.

Additional poles constructed within Segments 2 and 4 would increase the overall amount of construction work associated with the Project, including potentially increasing the daily worker and construction-related vehicle trips. However, any increase in daily construction traffic would be minimal and short-term, and would not resulting a decreased level of service or performance standard for any roadway or intersection utilized. Due to the short-term and linear nature of the Project's subtransmission line, construction work would be dispersed throughout the Project ROW with each site under construction for a short period. Workers would also be located at multiple construction sites at a time. Due to this linear movement of work sites, only minimal short-term traffic increases would result relative to existing background levels of traffic.

With regards to lane closures resulting in traffic delays, the increase in poles within Segments 2 and 4 would occur within the Project ROW and not result in any new roadway crossings or lane closures as those analyzed in the Draft EIR. Furthermore, added construction-related trips (including any oversize vehicle trips) would not result in any additional temporary road or lane closures. As such, no new or substantially more severe impacts related to construction-generated traffic would occur as a result of the changes to the Project.

Impact T-3: Construction interference with emergency response.

The increase in poles within Segments 2 and 4 would occur within the approved Project ROW and not result in any new roadway crossings as those analyzed in the Draft EIR. Furthermore, while the additional poles would result in an increase in construction vehicle trips and routes, these construction-related trips (including any oversize vehicle trips) would not result in any additional temporary road or lane closures that could restrict emergency vehicle response. Therefore, no new or substantially more severe impacts related to construction interference with emergency response would occur as a result of the changes to the Project.

Impact T-4: Loss of business and residential access.

As discussed above in Impact T-3, the changes to the Project would not result in any additional temporary road or lane closures that could restrict business or residential access. Therefore, no new or substantially more severe impacts related to loss of business or residential access would occur as a result of the changes to the Project.

Impact T-5: Loss of parking.

While the changes to the Project would result in an increase to construction activities, any increase in the number of daily workers would likely be minimal, as indicated in Table B-1 which shows the number of personnel for steel pole construction and conductor installation increasing from 16 to 20. Parking for workers' vehicles would continue to be provided at the staging sites on SCE property and not impact public parking resources. Furthermore, as discussed above, the changes to the Project would not result in any additional temporary road or lane closures that could impact public parking resources. As such, no new or substantially more severe impacts related to loss of parking would occur as a result of the changes to the Project.

Impact T-6: Disruption of public transit.

As discussed above, the changes to the Project would not result in any additional temporary road or lane closures that could disrupt public transit resources. Therefore, no new or substantially more severe impacts related to disruption of public transit would occur as a result of the changes to the Project.

Impact T-7: Disruption of rail service.

The increase in poles within Segments 2 and 4 would occur within the Project ROW and would not result in any new rail line crossings as those analyzed in the Draft EIR. As the additional poles would result in an increase in construction vehicle trips and routes, these construction-related trips (including any oversize vehicle trips) could result in additional rail line crossings. However, these additional crossings would not substantially impact rail operations. Therefore, no new or substantially more severe impacts related to disruption of rail service would occur as a result of the changes to the Project.

Impact T-8: Construction activities would cause temporary road closures that would impede pedestrian and/or bicycle movements.

As discussed above, the changes to the Project would not result in any additional temporary road or lane closures that could impede pedestrian and/or bicycle movements. Therefore, no new or substantially more severe impacts related to road closures impeding pedestrian and/or bicycle movements would occur as a result of the changes to the Project.

Impact T-9: Construction activities would cause physical damage to road ROWs.

The increase in poles within Segments 2 and 4 would occur within the Project ROW and would not cause direct physical damage to roadways. However, the additional poles would result in an increase in construction vehicle trips and routes, where these construction-related trips (including any oversize vehicle trips) could result in additional roadways potentially subject to damage. Mitigation Measure T-9 (Repair Damaged Road ROWs) would continue to be implemented as part of the Project to ensure that potential impacts associated with roadway damage from construction related vehicles are reduced. As

such, no new or substantially more severe impacts related to construction activities physically damaging road ROWs would occur as a result of the changes to the Project.

Impact T-10: Construction activities would affect aviation activities.

The increase in poles within Segments 2 and 4 would not impact construction activities analyzed within the Draft EIR for the Mill Creek Communications Site. Therefore, no new or substantially more severe impacts related to construction activities affecting aviation activities would occur as a result of the changes to the approved Project, and no mitigation measures are required.

Impact T-11: Construction and operations would affect aviation activities associated with public airports.

As discussed in Section B.1, SCE has determined that additional poles will be required along portions of the 115 kV subtransmission line alignment, the majority of which will be LWS poles rather than TSPs. Pursuant to FAA guidelines, SCE would be required to submit FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the Manager of the FAA Air Traffic Division for review and approval of the Project. The approved Project provided for TSPs to replace the existing H-frame structures along Segments 2 and 4. As shown in Figure B-3, updated heights for TSPs range from 75 to 120-feet tall (average of 85 feet) and LWS poles range from 75 to 105-feet tall (average of 80 feet). Since the majority of structures in Segments 2 and 4 would be shorter LWS poles rather than taller TSPs, this would facilitate SCE securing an FAA determination of no hazard to navigable airspace. As such, no new or more severe impacts related to construction and operations affecting aviation activities at public airports would occur as a result of the changes to the Project.

C.2.11 Effects Found Not to be Significant

CEQA requires that an EIR briefly explain the reasons why certain effects associated with a proposed project have been determined not to be significant, and thus not discussed in detail in the EIR (State CEQA Guidelines §21100(c)). As discussed in Section D.13 (Effects Found Not to be Significant) of the Final EIR, impacts related to Mineral Resources and Population and Housing for the approved Project would not be significant. The proposed changes to the project would be located in the same vicinity as the approved Project and would not construct housing or require additional construction personnel. As such, there would be no change in the impact significance as identified in the Final EIR or increase in the severity of such impacts.