

F. SUPPLEMENTAL DRAFT EIR COMMENTS AND RESPONSES

Table A-1 lists the persons, agencies, and organizations that provided comments on the Supplemental Draft EIR during the public review period, which ended on January 17, 2012. The verbatim comment letters, and responses to environmental issues raised in these letters, are presented in Section A.3 (Responses to Individual Comments). Comment letters are presented chronologically in the order of the date the comment letter was received and are grouped into the following categories:

- A – Comments from public agencies and elected officials;
- B – Comments from the Applicant (SCE); and
- C – Comments from individuals.

F.1 LIST OF COMMENTERS AND RESPONSES

The following provides an index to all commenter and response numbers.

Table F-1 – Index to Response to Comments

Comment Set	Agency/Affiliation	Name/Title of Commenter	Date Received	Response No.
A. Public Agencies and Elected Officials				
A1	Native American Heritage Commission	Dave Singleton – Program Analyst	12/7/2011	A1-1 through A1-3
A2	California Department of Transportation, District 8	Daniel Kopulsky – Office Chief, Community Planning/IG-CEQA	1/4/2012	A2-1
A3	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	Scott Morgan – Director	1/23/2012	A3-1
A4	Department of Toxic Substances Control	Al Shami – Project Manager, Brownfields and Environmental Restoration Program	1/24/2012	A4-1 through A4-12
A5	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	Scott Morgan – Director	1/25/2012	A5-1
B. Applicant (Southern California Edison)				
B1	Southern California Edison	Christine McLeod, SCE Regulatory Affairs	1/16/2012	B1-1 through B1-16
C. Individuals				
C1	Self	Avihu Greene, Psy.D.	1/2/2012	C1-1

F.2 COMMENTS AND RESPONSES TO COMMENTS

The following pages present the written and verbal comments received on the Supplemental Draft EIR during the public review period. Each of the comment documents has been given a number designation and the comments in each document have been numbered. Responses correspond to the comment numbers and immediately follow each comment document.

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Comment Set A1

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

815 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net



December 5, 2011

Ms. Juralynne Mosley, CPUC – EIR Project Manager
California Public Utilities Commission
c/o Aspen EG
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

Re: SCH#2007071076 CEQA Notice of Completion; Supplemental Draft Environmental Impact Report (SDEIR) for the "El Casco System Project;" located San Geronio Pass area of Riverside County, California

Dear Ms. Mosley:

The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance.' In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect.

A1-1

The NAHC Sacred Lands File (SLF) search resulted as follows: **Native American cultural resources were identified** within the project area identified (e.g. 'area of potential effect' or APE). Also, the absence of archaeological resources does not preclude their existence. . California Public Resources Code §§5097.94 (a) and 5097.96 authorize the NAHC to establish a Sacred Land Inventory to record Native American sacred sites and burial sites. These records are exempt from the provisions of the California Public Records Act pursuant to California Government Code §6254 (r). The purpose of this code is to protect such sites from

A1-2

Comment Set A1, continued

vandalism, theft and destruction. The NAHC 'Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

A1-2
cont.

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the *Tribal Consultation* requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15.

Furthermore, pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

A1-3

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq.*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254 (r) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be

2

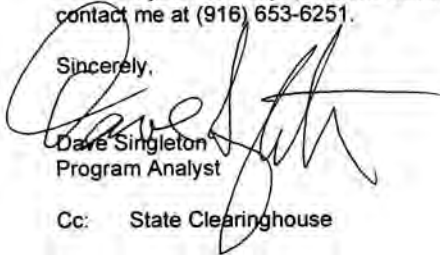
Comment Set A1, continued

followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Comment Set A1, continued

California Native American Contacts Riverside County December 5, 2011

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza, CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax

Morongo Band of Mission Indians
Robert Martin, Chairperson
12700 Pumarra Road Cahuilla
Banning, CA 92220 Serrano
(951) 849-8807
(951) 755-5200
(951) 922-8146 Fax

Santa Rosa Band of Mission Indians
John Marcus, Chairman
P.O. Box 391820 Cahuilla
Anza, CA 92539
sestrada@
(951) 659-2700
(951) 659-2228 Fax

Serrano Nation of Indians
Goldie Walker
P.O. Box 343 Serrano
Patton, CA 92369

(909) 862-9883

Morongo Band of Mission Indians
Michael Contreras, Cultural Heritage Prog.
12700 Pumarra Road Cahuilla
Banning, CA 92220 Serrano
(951) 201-1866 - cell
mcontreras@morongo-nsn.
gov
(951) 922-0105 Fax

Cahuilla Band of Indians
Luther Salgado, Sr., Chairperson
PO Box 391760 Cahuilla
Anza, CA 92539
tribalcouncil@cahuilla.net
915-763-5549

San Manuel Band of Mission Indians
Ann Brierty, Policy/Cultural Resources Departmen
26569 Community Center Drive Serrano
Highland, CA 92346
(909) 864-8933, Ext 3250
abrierty@sanmanuel-nsn.
gov
(909) 862-5152 Fax

Ernest H. Siva
Morongo Band of Mission Indians Tribal Elder
9570 Mias Canyon Road Serrano
Banning, CA 92220 Cahuilla
siva@dishmail.com
(951) 849-4676

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2007071076; CEQA Notice of Completion; Supplemental Draft Environmental Impact Report (SDEIR) for the El Casco System Project; located in the San Geronio Pass and Plateau area of Riverside County, California.

Response to Comment Set A1

Native American Heritage Commission

A1-1 Impacts to historical resources, including archaeological resources, were assessed in the Draft EIR (December 2007) for the original Proposed Project. As discussed in Section D.5.3.3 (Cultural Resources –Proposed Project Impact Analysis), the Proposed Project would result in less than significant impacts to cultural resources with implementation of Mitigation Measures CR-1a (Avoid Environmentally Sensitive Areas), CR-1b (Cultural Resources Treatment Plan), CR-1c (Construction Monitoring), CR-2 (Treatment of New Discoveries), CR-3a (Inventory Paleontological Resources in Final APE), CR-3b (Develop Paleontological Monitoring and Treatment Plan), CR-3c (Monitor Construction for Paleontology), CR-3d (Conduct Paleontological Data Recovery), and CR-3e (Train Construction Personnel). The Supplemental Draft EIR assesses whether or not the proposed changes to the Project would result in new or substantially different impacts to Cultural Resources. As discussed in Section C.2.4 (Cultural Resources), 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.

A1-2 The commenter states that the NAHC Sacred Lands File search identified cultural resources. Cultural resources along the Project alignment were identified in the Draft EIR (December 2007) in Tables D.5-1 through D.5-8, and have been considered in the analysis for the proposed changes to the Project.

A1-3 Consultation with Native American tribes has been conducted as part of the EIR process. During scoping for the El Casco System Project, in response to the Notice of Preparation (NOP), the NAHC provided a comment letter (dated July 24, 2007), including a list Native American contacts. Appendix 6 – Cultural Resources – Tribal Consultation) of the Draft EIR provides letters of consultation from SCE to 30 representatives of 14 tribal governments potentially affected by the Project, including:

- Letter from SCE to the Native American Heritage Commission (NAHC) requesting a Sacred Lands File search and list of Native American individuals/organizations who may have knowledge of cultural resources within the project area.
- Materials sent as attachments to the request letter regarding the proposed project.
- Reply from the NAHC to SCE with list of Native American individuals/organizations to consult concerning the proposed project.
- Letter from NAHC to California Public Utilities Commission (CPUC) concerning the Notice of Preparation (NOP) for the proposed project.
- Sample letter of consultation with attached maps from SCE regarding the proposed project.
- Mailing list for the above.

Responses of the two tribes listed below also are provided in Appendix 6 of the Draft EIR.

- Agua Caliente Band of Cahuilla Indians

- Morongo Band of Mission Indians

The Morongo Band of Mission Indians (Britt W. Wilson) commented on the Draft EIR (December 2007) and a response to the comments was provided in the Final EIR (April 2008). In the response it is noted that Mitigation Measure CR-1b (in Section D.5, Cultural Resources) was revised to include Morongo Tribal requests of consultation with SCE regarding construction monitoring and disposition of artifacts. The Final EIR (April 2008) was provided to both Britt Wilson (hard copy) and Robert Martin, Chairman (CD) from the Morongo Band of Mission Indians.

As part of the Recirculated Draft EIR (July 2008) and Recirculated Final EIR (October 2008) and Supplemental Draft EIR (November 2011), the Morongo Band of Mission Indians was again notified (Britt Wilson and Robert Martin, Chairman).

Comment Set A2

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN Jr. Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 8
PLANNING
464 WEST 4th STREET, 6th Floor MS 725
SAN BERNARDINO, CA 92401-1400
PHONE (909) 383-4557
FAX (909) 383-6890
TTY (909) 383-6300



*Flex your power!
Be energy efficient!*

December 6, 2011

Juralynne B. Mosley
California Public Utilities Commission
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

El Casco System Project Supplemental Draft Environmental Impact Report. SCH # 2007071076.
Riv-10-PM R3.06/13.863.

Dear Ms. Mosley,

We have completed our review for above noted project which runs parallel south of Interstate 10 (I-10) and crosses State Routes 79 and 243. This project includes the construction of the new El Casco Substation, upgrades to the existing Zanja and Banning Substations and SCE's Mill Creek Communications Site, upgrading of a total of 15.4 miles of existing 115 kV subtransmission line and associated structures, and the installation of fiber optic cables within existing conduits in public streets and on existing SCE structures between the Cities of Relands and Banning, California.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act (CEQA), it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the County of Riverside due to the Project's potential impact to State facilities it is also subject to the policies and regulations that govern the SHS.

This project does not appear to have any traffic-related impacts to the nearby SHS. We request applying for an encroachment permit if construction is to be done within State Right-of-Way:

Permit Requirements:

1. Any proposed alterations to existing improvements within State right-of-way may only be performed upon issuance of a valid encroachment permit and must conform to current Caltrans design standards and construction practices.
2. Review and approval of street, grading and drainage construction plans will be necessary prior to permit issuance. Information regarding permit application and submittal requirements may be obtained by contacting:

"Caltrans improves mobility across California"

A2-1

Comment Set A2, continued

Ms. Mosley
December 6, 2011
Page 2

Office of Encroachment Permits
Department of Transportation
464 West 4th Street, 6th Floor, MS-619
San Bernardino, CA 92401-1400
(909) 383-4526

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact Joe Shaer at (909) 383-6908 or myself at (909) 383-4557 for assistance.

Sincerely,



DANIEL KOPULSKY
Office Chief
Community Planning/IGR-CEQA

"Caltrans improves mobility across California"

Response to Comment Set A2

Department of Transportation

- A2-1** As noted in the comment letter, the Project crosses Interstate 10 (I-10) and State Routes 79 and 243. In the area of the proposed changes, the Proposed Project crosses State Route 79. As discussed in the Draft EIR (December 2007), Section D.11 (Transportation and Traffic), Mitigation Measure T-1c requires the preparation of Traffic Management Plans (TMPs) to all agencies with jurisdiction over public roads that would be affected by overhead and underground construction activities. TMPs are required as part of the required traffic encroachment permits. As noted in Mitigation Measure T-1c, “[i]nput and approval from the responsible public agencies shall be obtained; copies of approval letters from each jurisdiction must be provided to the CPUC prior to the start of construction within that jurisdiction...Documentation of the approval of these plans and issuance of encroachment permits shall be provided to the CPUC prior to the start of construction activities that require temporary closure of a public roadway.” Through Mitigation Measure T-1c, all required encroachment permits would be obtained and verified by the CPUC, as requested by the Department of Transportation.

Comment Set A3



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEN
DIRECTOR

January 19, 2012

Juralynne Mosley
CA Public Utilities Commission
c/o Aspen EG, 5020 Chesebro Rd., Suite 200
Agoura Hills, CA 91301

Subject: El Casco System Project
SCH#: 2007071076

Dear Juralynne Mosley:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 17, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 445-0610

A3-1

Comment Set A3, continued

Document Details Report State Clearinghouse Data Base

SCH# 2007071076
Project Title El Casco System Project
Lead Agency Public Utilities Commission

Type SIR Supplemental EIR
Description The approved Project includes construction of the new El Casco Substation, upgrading of the existing Zanja and Banning Substations and SCE's Mill Creek Communications Site, upgrading a total of 15.4 miles of 115 kV electric subtransmission line and associated structures, and installation of fiber optic communication cables. The Supplemental Draft EIR for the Project has been prepared to inform the public of changes to the approved Project and the associated environmental impacts resulting from new design information provided by SCE for Segments 2 and 4 of the 115 kV subtransmission line. Segment 2 begins just west of South Highland Home Road and continues east to a point just west of South San Geronio Avenue/Highway 243. Segment 4 begins just east of Bolo Court/Westward Avenue and continues east to just west of Highland Springs Avenue.

Lead Agency Contact

Name Juralynne Mosley
Agency CA Public Utilities Commission
Phone (415) 703-2210 **Fax**
email
Address c/o Aspen EG, 5020 Chesebro Rd., Suite 200
City Agoura Hills **State** CA **Zip** 91301

Project Location

County Riverside, San Bernardino
City Banning, Beaumont, Calimesa
Region
Lat / Long
Cross Streets
Parcel No. Multiple (Linear Project)
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 10, 60, 79, 243
Airports Banning Municipal Airport
Railways Southern Pacific
Waterways San Timoteo Creek
Schools
Land Use Multiple (linear project)

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Vegetation; Wetland/Riparian; Growth Inducing; Landuse

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Regional Water Quality Control Board, Region 7; Department of Toxic Substances Control; California Energy Commission; Native American Heritage Commission

Date Received 11/30/2011 **Start of Review** 12/01/2011 **End of Review** 01/17/2012

Note: Blanks in data fields result from insufficient information provided by lead agency.

Comment Set A3, continued

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

Clear
1/17/12
e



December 5, 2011



Ms. Juralynne Mosley, CPUC – EIR Project Manager
California Public Utilities Commission
c/o Aspen EG
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

Re: SCH#2007071076 CEQA Notice of Completion; Supplemental Draft Environmental Impact Report (SDEIR) for the "El Casco System Project;" located San Geronio Pass area of Riverside County, California

Dear Ms. Mosley:

The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources, impacted by proposed projects including archaeological, places of religious significance to Native Americans and burial sites. The NAHC wishes to comment on the proposed project.

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Comment Set A3, continued

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Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the [list of Native American contacts](#), to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Special reference is made to the *Tribal Consultation* requirements of the California 2006 Senate Bill 1059: enabling legislation to the federal Energy Policy Act of 2005 (P.L. 109-58), mandates consultation with Native American tribes (both federally recognized and non federally recognized) where electrically transmission lines are proposed. This is codified in the California Public Resources Code, Chapter 4.3 and §25330 to Division 15.

Furthermore, pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq.*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

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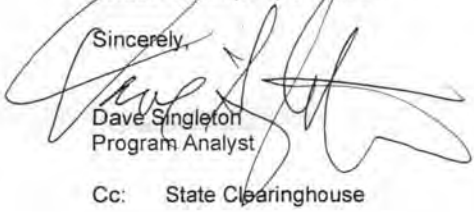
Comment Set A3, continued

followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,



Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Response to Comment Set A3

Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

- A3-1** As noted by the commenter, the State Clearinghouse submitted the Supplemental Draft EIR to selected State agencies for review, including the following: Resources Agency; Department of Fish and Game, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Regional Water quality Control Board, Region 7; Department of Toxic Substances Control; California Energy Commission; and Native American Heritage Commission.. Comments from the responding agencies were limited to the Native American Heritage Commission. This comment letter has been provided for use in preparing the final environmental document. Thank you for providing the comment letter. This same letter was received in a separate submittal from the Native American Heritage Commission. Please see responses to Comment Set A1.

Comment Set A4



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

January 12, 2012

Ms. Juralynne Mosley
California Public Utilities Commission
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, California 91301

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR EL CASCO SYSTEM
PROJECT (SCH# 2007071076)

Dear Ms. Mosley:

The Department of Toxic Substances Control (DTSC) has received your submitted Draft Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The proposed El Casco System Project would include the following major components:

Construct a new 220/115/12 kilovolt (kV) substation within the Norton Younglove Reserve in the County of Riverside (El Casco Substation), associated 220 kV and 115 kV interconnections, and new 12 kV line getaways.

Replace approximately 13 miles of existing 115 kV sub transmission lines with new, higher capacity double-circuit 115 kV sub transmission lines and replace support structures within existing SCE rights-of-way (ROWs) in the Cities of Banning and unincorporated areas of Riverside County.

Replace approximately 1.9 miles of existing single-circuit 115 kV sub transmission lines with new, higher capacity single-circuit 115 kV sub transmission lines and replace support structures within existing SCE ROWs in the City of Beaumont and unincorporated Riverside County.

Replace approximately 0.5 miles of existing single-circuit 115 kV sub transmission lines with new, higher capacity single-circuit 115 kV sub transmission lines on existing support structures within existing SCE ROWs in the City of Beaumont and unincorporated Riverside County.

Rebuild 115 kV switchracks within Banning and Zanja Substations in the Cities of Banning and Yucaipa, respectively.

Comment Set A4, continued

Ms. Juralynne Mosley
January 17, 2012
Page 2

Install telecommunications equipment at the proposed El Casco Substation and at SCE's existing Mill Creek Communications Site.


Install fiber optic cables within public streets and on existing SCE structures between the Cities of Redlands and Banning".

DTSC sent you comments on Notice of Preparation Report (NOP) for the above-mentioned project on 8/15/2007, and comments on DEIR on 1/22/2008, which should be addressed. Based on the review of the submitted document DTSC has no further comments.

A4-1

If you have any questions regarding this letter, please contact me at ashami@dtsc.ca.gov, or by phone at (714) 484-5472.

Sincerely,



Al Shami
Project Manager
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
nritter@dtsc.ca.gov

CEQA # 3391

ATTACHMENT – ORIGINAL DRAFT EIR COMMENT LETTER

January 22, 2008

Ms. Juralynne Mosley
California Public Utilities Commission
c/o Aspen Environmental Group 30423 Canwood Street, Suite 215
Agoura Hills, California 91301

NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR EL CASCO SYSTEM PROJECT (SCH# 2007071076)

Dear Ms. Mosley:

The Department of Toxic Substances Control (DTSC) has received your submitted document for the above-mentioned project. As stated in your document: "The El Casco System Project includes the proposed El Casco Substation site, upgrades to the Zanja and Banning Substations and the SCE's Mill Creek Communications Site, upgrading of a total of 15.4 miles of existing 115kV sub transmission line and associated structures, and the installation of fiber optics cables within existing conduits in public streets and on existing SCE structures between the Cities of Redlands and Banning. All portions of the Proposed Project are located within Riverside and San Bernardino Counties, California.

The proposed El Casco System Project would include the following major components:

Construct a new 220/115/12 kilovolt (kV) substation within the Norton Young love Reserve in the County of Riverside (El Casco Substation), associated 220 Kv and 115 kV interconnections, and new 12 kV line getaways.

Replace approximately 13 miles of existing 115 kV sub transmission lines with new, higher capacity double-circuit 115 kV sub transmission lines and replace support structures within existing SCE rights-of-way (ROWs) in the Cities of Banning and unincorporated areas of Riverside County.

Replace approximately 1.9 miles of existing single-circuit 115 kV sub transmission lines with new, higher capacity single-circuit 115 kV sub transmission lines and replace support structures within existing SCE ROWs in the City of Beaumont and unincorporated Riverside County.

Replace approximately 0.5 miles of existing single-circuit 115 kV sub transmission lines with new, higher capacity single-circuit 115 kV sub transmission lines on existing support structures within existing SCE ROWs in the City of Beaumont and unincorporated Riverside County.

Rebuild 115 kV switchracks within Banning and Zanja Substations in the Cities of Banning and Yucaipa, respectively.

Install telecommunications equipment at the proposed El Casco Substation and at SCE's existing Mill Creek Communications Site.

Install fiber optic cables within public streets and on existing SCE structures between the Cities of Redlands and Banning”.

DTSC has reviewed the NOP and sent you comments on it on 8/15/07. Based on the review of the submitted EIR document DTSC has additional comments as follows:

- | | | |
|----|---|-------------|
| 1. | All environmental investigations, sampling and/or remediation should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous waste cleanup. The findings and sampling results from the subsequent report should be clearly summarized in the EIR. | A4-2 |
| 2. | Proper investigation, sampling and remedial actions, if necessary, should be conducted at the site prior to the new development or any construction, and overseen by a regulatory agency. | A4-3 |
| 3. | If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the “Border Zone of a Contaminated Property.” Appropriate precautions should be taken prior to construction if the proposed project is within a “Border Zone Property | A4-4 |
| 4. | Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. A study of the site overseen by the appropriate government agency might have to be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment. | A4-5 |
| 5. | If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If so, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. | A4-6 |
| 6. | If hazardous wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (818) 551-2171 to initiate pre application discussions and determine the permitting process applicable to the facility. | A4-7 |
| 7. | Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. | A4-8 |
| | | A4-9 |

- | | |
|--|--------------|
| 8. If the project plans include discharging wastewater to a storm drain, you may be required to obtain a wastewater discharge permit from the overseeing Regional Water Quality Control Board. | A4-10 |
| 9. The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions (LDRs) may be applicable to these soils. Also, if the project proposes to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination. | A4-11 |
| 10. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight. | A4-12 |
| 11. In future CEQA documents, please provide the following additional contact information: contact person title and e-mail address. | |

If you have any questions regarding this letter, please contact Mr. Al Shami, Project Manager, at (714) 484-5472 or at "ashami@dtsc.ca.gov".

Sincerely,

Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

CEQA # 1976

Response to Comment Set A4

Department of Toxic Substances Control

- A4-1** Based on the review of the Supplemental Draft EIR, DTSC has no further comments. Issues related to Hazards and Hazardous Materials are described in detail in the Draft EIR (December 2007) in Section D.7. No comments pertaining to the Supplemental Draft EIR have been submitted; therefore, no revisions to the Supplemental Final EIR have been made in response to Comment A4-1.
- A4-2** As noted by the commenter, DTSC provided comments on the NOP on 8/15/2007 and on the Draft EIR on 1/22/2008. The comments on the Draft EIR were not previously received by the CPUC and were not addressed in the Final EIR (April 2008). As such, these comments are being addressed at this time. Please see the responses below (A4-3 through A4-12).
- A4-3** As discussed in Draft EIR (December 2007), Section D.7 (Hazards and Hazardous Materials):

Construction of the substation and new tower footings would involve excavation into soil. If new excavations occurred in areas containing hazardous materials, workers could be at risk as they move contaminated soil. Contaminant plumes flow down-gradient (downhill). The database search report identified three sites with potentially hazardous substances within a one mile radius. All three of these sites are located at lower elevations than the proposed substation site and are at least 0.25 mile away. Two of the sites represent cleanups of petroleum-impacted soils and the third noted underground storage tanks (SCE, 2007a). Since the Proposed Project site is up-gradient or cross-gradient from these sites, any contamination emanating from these sites would flow away from the Project area.

A radius report was not prepared for the 115 kV subtransmission line alignment because no new land agreements (such as a lease or purchase agreement) have occurred on the right-of-way (ROW). Additionally, the alignment has been an SCE electric facility for over 60 years. Most of the subtransmission line alignment is surrounded by undeveloped land or residential development, although some industrial development has occurred near portions of the alignment in the city of Banning, near the Banning Substation. An EDR report was previously prepared for the Banning Substation. Four sites within 0.25 mile of the substation site were identified on the Leaking Underground Storage Tank (LUST) list; however, all four sites involved releases to soil only and are currently closed (EDR, 2006). Therefore, the possibility that contamination associated with these sites could have migrated to the Project alignment is low. The Zanja Substation and Mill Creek Communication sites are surrounded by vacant, undeveloped land that is unlikely to have been exposed to contamination as a result of routine historical use.

Furthermore, as described under Impact HAZ-2:

If soil contamination were present within a construction area, the contaminated soils disturbed or excavated during construction activities could pose a potential health risk to construction workers and/or the public through airborne or physical exposure to contaminants. Contaminated soils must be handled and disposed of in accordance with local, State, and federal regulations. If soil contamination is discovered to be present in any construction areas, all excavation would proceed according to worker safety requirements of the federal and California Occupational Safety and Health Administrations (OSHA). If there is any site contamination that would require action, OSHA rules would require a site-specific Health and Safety Plan (HASP) 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, the BMPs included in Mitigation Measures HAZ-1a (Environmental Training and Monitoring Program), HAZ-1b (Proper Disposal of Construction Waste), and HAZ-1c (Emergency Spill Supplies and Equipment) ensure impacts associated with an accidental release of hazardous materials during construction and operation of the Proposed Project would be less than significant (Class II).

As such, if site contamination were to be found, a site-specific Health and Safety Plan (HASP) would be prepared and would be overseen by a regulatory agency that has jurisdiction to oversee hazardous waste cleanup. It should also be noted that construction of the El Casco Substation is essentially complete, and construction Segments 6, 7, and 8 of the 115 kV subtransmission line have started. No site contamination has been discovered throughout these activities.

A4-4 Please see response to comment A4-3.

A4-5 Please see response to comment A4-3.

A4-6 Please see response to comment A4-3.

A4-7 The commenter states that if the proposed operations will generate hazardous wastes, the wastes must be managed in accordance with California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5), and the facility should obtain a USEPA Identification Number. All regulations and laws will be followed for the approved (and proposed redesigned) Project. There have been no issues associated with the approved Project that would result in the need to manage hazardous wastes, and there is no reason to expect that the proposed redesign would result in any need to manage hazardous wastes.

A4-8 The commenter states that if hazardous wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. As discussed in Draft EIR (December 2007) Section D.7 (Hazards and Hazardous Materials) for Impact HAZ-2, operation of the Project would not involve the use or storage of substantial amounts of hazardous materials. No hazardous wastes are being

- used, stored, treated onsite or disposed of onsite. No additional coordination with or permitting through DTSC is required.
- A4-9** The commenter states that certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). The Project does not involve the treatment of hazardous wastes.
- A4-10** The commenter states that a wastewater discharge permit may be required if the project plans include discharging wastewater to a storm drain. The approved Project (or as modified) does not generate wastewater and is not discharging wastewater into storm drains.
- A4-11** The commenter states that appropriate sampling is required prior to disposal of excavated soil. Please see response to comment A4-3.
- A4-12** The commenter states that if soil and/or groundwater contamination is suspected during construction/demolition, work in the area should cease and appropriate health and safety procedures should be implemented. If contaminated soil and/or groundwater exist, the EIR should identify how investigations and/or remediation would be conducted and the agency to provide oversight. Please see response to comment A4-3.

Comment Set A5



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

January 23, 2012

Juralynne Mosley
CA Public Utilities Commission
c/o Aspen EG, 5020 Chesebro Rd., Suite 200
Agoura Hills, CA 91301

Subject: El Casco System Project
SCH#: 2007071076

Dear Juralynne Mosley:

The enclosed comment (s) on your Supplemental EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on January 17, 2012. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2007071076) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A5-1

Comment Set A5, continued



Department of Toxic Substances Control

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

January 12, 2012

1/17/12
Late
E



Ms. Juralynne Mosley
California Public Utilities Commission
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, California 91301

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR EL CASCO SYSTEM
PROJECT (SCH# 2007071076)

Dear Ms. Mosley:

The Department of Toxic Substances Control (DTSC) has received your submitted Draft Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The proposed El Casco System Project would include the following major components:

Construct a new 220/115/12 kilovolt (kV) substation within the Norton Younglove Reserve in the County of Riverside (El Casco Substation), associated 220 kV and 115 kV interconnections, and new 12 kV line getaways.

Replace approximately 13 miles of existing 115 kV sub transmission lines with new, higher capacity double-circuit 115 kV sub transmission lines and replace support structures within existing SCE rights-of-way (ROWs) in the Cities of Banning and unincorporated areas of Riverside County.

Replace approximately 1.9 miles of existing single-circuit 115 kV sub transmission lines with new, higher capacity single-circuit 115 kV sub transmission lines and replace support structures within existing SCE ROWs in the City of Beaumont and unincorporated Riverside County.

Replace approximately 0.5 miles of existing single-circuit 115 kV sub transmission lines with new, higher capacity single-circuit 115 kV sub transmission lines on existing support structures within existing SCE ROWs in the City of Beaumont and unincorporated Riverside County.

Rebuild 115 kV switchracks within Banning and Zanja Substations in the Cities of Banning and Yucaipa, respectively.

Ms. Juralynne Mosley
January 17, 2012
Page 2

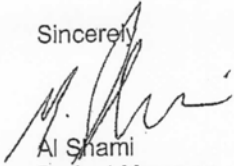
Install telecommunications equipment at the proposed El Casco Substation and at SCE's existing Mill Creek Communications Site.

Install fiber optic cables within public streets and on existing SCE structures between the Cities of Redlands and Banning".

DTSC sent you comments on Notice of Preparation Report (NOP) for the above-mentioned project on 8/15/2007, and comments on DEIR on 1/22/2008, which should be addressed. Based on the review of the submitted document DTSC has no further comments.

If you have any questions regarding this letter, please contact me at ashami@dtsc.ca.gov, or by phone at (714) 484-5472.

Sincerely,



Al Shami
Project Manager
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
nritter@dtsc.ca.gov

CEQA # 3391

Response to Comment Set A5

Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

- A5-1** As noted by the commenter, the attached letter was received by the State Clearinghouse. This same letter was received in a separate submittal from the Department of Toxic Substances Control. Please see responses to Comment Set A4.

Comment Set B1



January 16, 2012

Ms. Juralynne Mosley
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301
Attn: El Casco System Project - via email to elcasco@aspeneg.com

Re: SCE's Comments on the Supplemental Draft Environmental Impact Report (SCH #2007071076) for the El Casco System Project (D. 08-12-031)

Dear Ms. Mosley:

Enclosed please find SCE's comments to the above-referenced Supplemental Draft Environmental Impact Report (SDEIR) circulated by the California Public Utilities Commission (CPUC) on November 30, 2011.

Thank you for the opportunity to comment on the SDEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine McLeod", is written over the typed name.

Christine McLeod
SCE Regulatory Affairs

Enclosure

P.O. Box 800
2244 Walnut Grove Ave.
Rosemead, CA 91770

Comment Set B1, continued

El Casco System Project DSEIR
 Southern California Edison Comment Matrix – January 16, 2012

Section/Page Reference	Comment	Proposed Revision
ES.1 / p. ES-2	Executive Summary should state that comments should be submitted only on the SDEIR.	Copy text from Section A.1.2, page A-2.
p. ES-3 p. A-6	The description of the proposed modification should provide the total number of poles proposed under the revised project	3 rd paragraph under “Description of the Proposed Modifications” should begin with the following sentence: “The revised design includes a total of 248 steel poles (versus “approximately 225” described in the previously approved conceptual design).
p. ES-3 p. A-6 p. B-2	The description of the proposed modifications should provide the typical LWS and TSP structure heights, consistent with Figure B-3 on Page B-17 of the SDEIR.	The “Description of the Proposed Modifications” should end with the following sentence: “The typical LWS height is proposed to be 80 feet and the typical TSP height is proposed to be 85 feet, as depicted on Figure B-3 on page B-17 of the SDEIR.”
p. ES-4 p. C.1-14 p. C.1-15	The analysis of construction impacts is not altered from the analysis included in the original EIR as a result of the proposed modifications to segments 2 & 4.	Discussion should note that 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.
p. ES-4 p. C.1-18 p. C.1-19 p. C.1-20	The analysis of cumulative impacts is not altered from the analysis included in the original EIR as a result of the proposed modifications to segments 2 & 4.	Discussion should note that 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.
p. ES-4 and ES-5 Section C.1	SCE respectfully disagrees with the conclusions of the visual analysis. SCE’s visual analysis (previously submitted to the CPUC and included in the References Section as SCE, 2010a) concluded that the visual impacts would remain less than significant with the modifications proposed to Segments 2 & 4.	
p. B-1	The delineation of the 115 kV transmission line work element into segments was done for construction planning purposes, and was not introduced until after the PTC was	The discussion should note that the original EIR did not analyze project impacts on a segment-by-segment basis.

B1-1

B1-2

B1-3

B1-4

B1-5

B1-6

B1-7

Comment Set B1, continued

El Casco System Project DSEIR
 Southern California Edison Comment Matrix – January 16, 2012

Section/Page Reference	Comment	Proposed Revision
	issued.	
p. B-1/2	The original EIR analysis did not review a specific number of structures for Segments 2 & 4, as the concept of Segments was not introduced until after the PTC was issued.	The discussion should note that the original EIR did not provide a specific number of structures for Segments 2 & 4.
p. C.1-24 and C.1-25	SCE notes that the image in Figure C.1-3A has been cropped and the resulting image is no longer an accurate depiction of the existing view from the standpoint of an observer at the KVP. Thus the version of this simulation presented in C.1-3B overstates the visual impact of the proposed steel poles.	The visual simulations should be based on the original images of this KVP, which were created by CH2MHill and provided by SCE. These images were produced following industry standards and should be used without cropping. Revise the impact assessment for KVP 2 to reflect the use of the image which properly portrays the appearance of the view with the project in place.
p. C.1-7	As noted in SCE's comments to the original DEIR, because the CPUC has preemptive jurisdiction over the Project pursuant to CPUC General Order 131-D, no local plan consistency evaluations are required.	The discussion should clearly state that the proposed project is not subject to these local plans and standards relating to visual resources.
p. C.1-11	The fifth significance criterion is not derived from the CEQA Guidelines. In addition as noted above, local plan consistency evaluations are not required. Therefore, it is inappropriate to utilize this as a significance threshold for visual impacts.	The fifth significance criterion should be eliminated from the visual impacts analysis.
p. C.1-16	The discussion of Impact V-19 refers to "view blockage of background hills, mountains, and sky" that would result from the revised Project. However, in the visual simulation relevant to this analysis, no background hills or mountains are visible.	Analysis and text should be revised accordingly.

B1-7, cont.
B1-8

B1-9

B1-10

B1-11

B1-12

Comment Set B1, continued

El Casco System Project DSEIR
Southern California Edison Comment Matrix – January 16, 2012

Section/Page Reference	Comment	Proposed Revision
p. C.1-17	The discussion of Impact V-20 refers to “view blockage of background hills and sky.” However, in the visual simulations relevant to this analysis, no background hills are visible.	Analysis and text should be revised accordingly.
p. C.1-18	The discussion of Impact V-21 refers to “view blockage of background mountains and sky.” However, in the visual simulations relevant to this analysis, no background mountains are visible.	Analysis and text should be revised accordingly.
p. C.1-19 & C.1-20	SCE is aware the Liberty XXIII Renewable Energy Biomass Project (No.E1) never moved forward and has been cancelled.	Analysis and text should be revised accordingly.
p. C.1-30	Attachment VR-2S references mitigation measures V-19a and V-20a. However, the analysis does not include any discussion of these measures. The analysis for Impact V-19 and Impact V-20 states that “no feasible mitigation is available to reduce this visual impact.”	This inconsistency should be resolved.

| **B1-13**
| **B1-14**
| **B1-15**
| **B1-16**

Response to Comment Set B1

Southern California Edison

- B1-1** The commenter requests that the Executive Summary state that comments be submitted only on the Supplemental DEIR. The Executive Summary does not discuss the submittal of comments. However, the Notice of Availability (NOA), which was distributed with all hard copies, as well as mailed to individual property owners within 300 feet of the proposed Project right-of-way specifically states “The public is invited to provide written comment on those portions of the document that have been revised and included in the Supplemental Draft EIR.” No edits to the Supplemental Final EIR are required.
- B1-2** As requested, language has been added to the Executive Summary under “Description of the Proposed Modifications” (p. ES-3) and to Section A.4 (Overview of Proposed Modifications, p. A-6). The added text is as follows: “The revised design would include a total of 248 new steel poles (versus the approximately 225 steel poles described in the approved EIR based on a conceptual design).”
- B1-3** As requested, language has been added to the Executive Summary under “Description of the Proposed Modifications” (p. ES-3), Section A.4 (p. A-6), and Section B.1.1 (p. B-2). The added text is as follows: “As shown in Figure B-3, the typical LWS pole height would be 80 feet and the typical TSP height would be 85 feet.”
- B1-4** The commenter states that construction impacts are not altered from the analysis included in the original EIR as a result of the proposed modifications to Segments 2 and 4 and requests that the discussion of construction impacts note that 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. The proposed modifications to Segment 2 and 4 result in the installation of a greater number of LWS poles as opposed to TSPs in each of these segments. Although construction impacts would occur in the same right-of-way as was previously analyzed in the Draft EIR (December 2007), the construction methods associated with these pole types are different, and therefore have the potential to result in a change in the construction impacts. As such, the Supplemental DEIR analyzes the construction impacts of the proposed changes. As discussed in the Section C.1 (Visual Resources), for construction (Impacts V-1 and V-2), the resulting significance conclusions and recommended mitigation measures are identical to the Draft EIR (December 2007). No new or substantially more severe impacts from construction would occur with respect to visual resources or any other resource (see Section C.2 [Issue Areas Where Modifications Result in No Substantial Change]) and no additional mitigation measures are required.
- B1-5** The commenter states that cumulative impacts are not altered from the analysis included in the original EIR as a result of the proposed modification to Segments 2 and 4 and requests that the discussion of cumulative impacts note that 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. The proposed modifications to Segment 2 and 4 result in the installation of a greater number of LWS poles as opposed to TSPs in each of these segments, resulting in new significant and unavoidable impacts (Impacts V-19 and V-20). As such, the cumulative impact discussion in Supplemental DEIR Section C.1.3.6

considered the changes in the Project's impacts, which result in a greater contribution to cumulative effects. No edits to the Supplemental Final EIR are required.

- B1-6** Thank you for your comment. It will be shared with the decision-makers at the CPUC. SCE's visual analysis (Reference SCE, 2010a) was reviewed and considered by the CPUC. In addition, the CPUC performed an independent technical analysis of the proposed changes. This technical analysis was completed by Michael Clayton of Michael Clayton & Associates, who is a well-qualified Visual Resources specialist.
- B1-7** The commenter notes that the delineation of the 115 kV subtransmission line into segments was done for construction planning purposes and not introduced until after the PTC was issued, and therefore request that the project description note that the original EIR did not analyze project impacts on a segment-by-segment basis. As stated in the first paragraph in Section B (Modifications to the Project), "To better manage and track construction resources, public notifications, and environmental reviews, the subtransmission line element of the Project was divided into eight segments of varying lengths, referred to as Segments 1 through 8, as shown in Figure B-1 (at the end of this section)." As such, the reason for the segment definitions has been provided. Furthermore, Section B.1.1 (Structures and Associated Equipment) discusses the original Draft EIR (first paragraph) and states "The existing wood H-frame, three-pole, and single-pole structures would be removed and the new steel poles would primarily be installed at the same locations as the existing structures." This formulates the basis for the analysis in the original Draft EIR. No change to the Supplemental Final EIR is required.
- B1-8** The commenter notes that the original EIR did not review a specific number of structures for Segments 2 and 4. As stated in Section B.1.1 (Structures and Associated Equipment), in discussing the original Draft EIR (first paragraph) it states "The existing wood H-frame, three-pole, and single-pole structures would be removed and the new steel poles would primarily be installed at the same locations as the existing structures." This formulates the basis for the analysis in the original Draft EIR. Furthermore, the description of Segments 2 and 4 in Section B.1.1 (paragraphs 3 and 4) clearly states the number of new poles to be installed, as well as the number of existing structures to be removed with the proposed modifications, and compares this to the number of structures analyzed in the original Draft EIR. As such, the change between what was approved and what is currently being proposed is clear. No change to the Supplemental Final EIR is required.
- B1-9** The images provided by the Applicant/CH2M Hill were re-scaled to present as 11"x17" color images at approximately "life-size scale" when viewed at a standard reading/viewing distance of 18 inches (i.e., when the report image is held at a distance of 18 inches from the eye, all landscape features in the image would appear to be the same scale and size as they would appear in the field at the viewpoint location). Though this presentation results in some slight cropping of image context, it provides a more accurate depiction of the observer viewing experience relative to project scale and impression. This approach more accurately illustrates the visual impact of the proposed steel poles.

The photos and visual simulations contained in the Supplemental Draft EIR are technically sound and adequate and the resulting impact analysis and conclusions are reasonable and correct. No revisions to the Supplemental Final EIR have been made in response to Comment B1-9.

B1-10 While it is true that the CPUC has preemptive jurisdiction over the Project, the CPUC also looks closely at the consistency of a project with local plans and standards during the evaluation of the project consistent with CEQA Guidelines Appendix G. The Visual Resources impact criterion pertaining to consistency with local regulations, plans, and standards is included to aid the Commission in its understanding of the local implications of approving the project as modified. Furthermore, this approach is consistent with other environmental documents issued by the CPUC. Therefore, no change has been made to the Supplemental Final EIR.

B1-11 Please note that the checklist provided in Appendix G of the CEQA Guidelines is “only a suggested form” with a list of “sample” questions to help a lead agency determine whether an EIR should be prepared for a particular project; it is not a mandatory set of thresholds. (See CEQA Guidelines, Appendix G.) The CEQA Guidelines explain that “[s]ample forms for an applicant’s project description and review form for use by the lead agency are contained in Appendices G and H...These forms are only suggested, and public agencies are free to devise their own format for an initial study.” (14 Cal. Code Regs. § 15063(f)). Moreover, case law makes clear that a lead agency should not rely exclusively on Appendix G (See *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109-1112). Accordingly, the significance criteria used in an EIR is not limited to the questions provided in Appendix G.

Please also note that the CPUC has not adopted any significance criteria “for general use” pursuant to CEQA Guidelines § 15064.7 or otherwise. The CPUC’s Information and Criteria List explicitly states that “[t]here [are] no strict criteria for determining the significance of an impact. The determination ultimately requires the exercise of reasoned judgment taking into account the nature of the project and environmental setting.” (Information and Criteria List, Section V.4.) In addition, the Information and Criteria List sets out the requirements for preparation of a Proponents’ Environmental Assessment (“PEA”) and does not govern preparation of an EIR. (See CPUC Rules of Practice and Procedure, Rule 2.4(b).)

CEQA gives the lead agency discretion to determine appropriate significance criteria. “The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An iron clad definition of significant effect is not always possible because the significance of an activity may vary with the setting.” (14 Cal. Code Regs. § 15064(b).) Therefore, “a lead agency has the discretion to determine whether to classify an impact described in an EIR as ‘significant,’ depending on the nature of the area affected.” (*Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 493.)

The significance criteria used in the Supplemental Draft EIR are identical to those identified in the original Draft EIR. Since the analysis in the Supplemental Draft EIR is in effect supplementing the analysis in the original Draft EIR, the same approach to visual impacts assessment and significance criteria were employed. No changes to the Supplemental Final EIR are required. Please also see response to comment B1-10.

B1-12 The simulation referenced in the discussion of Impact V-19 was provided by the Applicant and was based on an existing landscape photograph, also provided by the Applicant. The particular view orientation to the west that is captured in the referenced image does not

show the background hills and mountains that are readily apparent to the north, just outside of the frame of view. Views to the northwest, north, and northeast from this same viewpoint encompass the background hills and mountains that are partially obscured by the Project. It is important to remember that viewpoints and viewpoint analyses (including the one referenced here for Impact V-19) represent the broader viewing experience along the route. As such, the referenced discussion on Supplemental Draft EIR Page C.1-16 is accurate and no change has been made to the Supplemental Final EIR.

- B1-13** The simulation referenced in the discussion of Impact V-20 was provided by the Applicant and was based on an existing landscape photograph, also provided by the Applicant. The particular view orientation to the west-southwest that is captured in the referenced image does not show the background hills that are readily apparent to the south, just outside of the frame of view. Views to the southwest, south, and southeast from this same viewpoint and from residences along Faircliff Street encompass the background hills to the south that are partially obscured by the Project. It is important to remember that viewpoints and viewpoint analyses (including the one referenced here for Impact V-20) represent the broader viewing experience along the route. As such, the referenced discussion on Supplemental Draft EIR Page C.1-17 is accurate and no change has been made to the Supplemental Final EIR.
- B1-14** The simulation referenced in the discussion of Impact V-20 was provided by the Applicant and was based on an existing landscape photograph, also provided by the Applicant. The particular view orientation to the south that is captured in the referenced image does not show the background hills and mountains that are readily apparent to the southeast, just outside of the frame of view, and hills that are readily apparent to the southwest, just outside of the frame of view. Views to the southwest and southeast from this same viewpoint and from other viewpoints along SR-79 encompass the background hills and mountains to the southeast and hills to the southwest that are partially obscured by the Project. It is important to remember that viewpoints and viewpoint analyses (including the one referenced here for Impact V-21) represent the broader viewing experience along the route. As such, the referenced discussion on Supplemental Draft EIR Page C.1-18 is accurate and no change has been made to the Supplemental Final EIR.
- B1-15** As noted by the commenter, the Liberty XXIII Renewable Energy Biomass Project (No. E1) was never built. The text of the Supplemental Final EIR has been revised to remove this project from the cumulative discussion in Section C.1.3.6 (Cumulative Impacts Analysis).
- B1-16** The commenter notes that Attachment VR-2S references mitigation measures V-19a and V-20a, although the analysis does not include these measures. Attachment VR-2S has been revised in the Supplemental Final EIR to remove reference to these measures, as this was an error. Attachment VR-2S is now consistent with the analysis within Section C.1 (Visual Resources).

Comment Set C1

Avihu Greene, Psy.D.
1570 Bloomington Park
Beaumont CA 92223
(951) 922 1770

January 2, 2012

Juralynne B. Mosley
California Public Utilities Commission
c/o Aspen Environmental Group
5020 Chesebro Road, Suite 200
Agoura Hills, CA 91301

To Whom It May Concern:


I am writing to comment on the Supplemental Draft EIR for the El Casco System Project Segment 4. I reside in the Four Seasons subdivision in Beaumont and my property lies directly on the SCE easement. It is clear that the CPUC's finding of "significant increase in structure contrast, industrial character, view blockage, and skylining resulting in significant and unavoidable impacts (Impacts V-19 and V-20)," as well as noting that "the proposed changes to the Project would also result in a significant and unavoidable cumulative impact resulting from a perceived increase in the industrialization of the landscape," will have the most impact current and future residents who currently live along the easement.

It seems that placing the transmission lines underground would be an obvious and simple solution to the problem caused by the newly revised plans. Given that the current plans essentially double the number of poles and thereby substantially increase both the material and labor costs of the project, it seems that this is the most opportune time to reevaluate the cost/benefit of placing the lines underground. Not only would the negative visual impact in the residential areas be nullified, but also the opening of the green space would significantly enhance the market value of the properties along, and in proximity to, the SCE easement. Additionally, placement of the lines below ground would provide a ready conduit for any future enhancements for electricity and telecommunications delivery, as well as negating any possible impact of downed power lines due to winds or other natural disasters.

Given the topography of Segment 4, it is possible that the cost of installing the power lines underground may be further minimized if the lines are buried only through the residential districts demarcated within the Beaumont boundaries (essentially segment 4-1 and 4-2). This partial burial solution will also provide the maximum diminution of the negative visual impact of the current plan where it is most apparent, and impacts the greatest number of people, aesthetically and economically.

Thank you for your time and attention to this matter. I hope that my input can serve to illuminate the viewpoint of other constituents and will provide the impetus for positive action to finally complete this project in a manner that will serve all stakeholders.

Sincerely,



Avihu Greene, Psy.D.

C1-1

Response to Comment Set C1

Avihu Greene, Psy.D.

C1-1 The commenter requests that the 115 kV subtransmission line be placed underground through the residential districts demarcated within the Beaumont boundaries (Segments 4-1 and 4-2) to reduce the negative visual impact in the residential areas. The Recirculated Draft EIR (July 2008) for the original Proposed Project evaluated undergrounding a portion of the transmission line and determined that undergrounding the line would result in substantially more severe impacts to air quality, biological resources, cultural resources, geology and soils, hazardous materials, hydrology and water quality, noise, and traffic than construction of the line aboveground. Similarly, while undergrounding of the 115 kV subtransmission line within Segments 4-1 and 4-2 would reduce visual impacts in those areas, it would have the following environmental impacts:

- Underground construction would result in greater nitrogen oxide (NO_x) and particulate matter (PM₁₀) emissions and the highest localized impacts to sensitive receptors (residences) due to trenching and the extended construction period that would be required.
- The extended duration for construction would increase wildlife disruption.
- The increase ground disturbance during construction would result in greater possibility of encountering undiscovered buried cultural or paleontological resources.
- The extensive trenching required would increase the amount of soil disturbed and the associated risk of erosion during construction.
- Underground construction would increase the possibility of impacts to groundwater.
- The greater construction equipment requirements for underground construction would increase the use of hazardous materials and associated risks for spills and contamination.
- Noise associated with underground construction would affect the same sensitive receptors, but the intensity and duration of the impacts would increase substantially.
- The extended construction duration would result in increased road delays.

Additionally, undergrounding the 115 kV subtransmission line west of Highland Springs Avenue would not result in significant benefits since cinder block walls separate the Four Seasons' residential development from the ROW, which would partially block views of the transmission line, and the residential structures are sited such that the back of the houses are adjacent to the ROW. In addition, the ROW immediately west of Highland Springs Avenue is dedicated to the 115 kV subtransmission line. (See Recirculated Draft EIR, July 2008, Section E.2.1.2.)

Further, the previous Commission decision approving the originally Proposed Project (D. 08-12-031) considered underground construction in the Sun Lakes area. The Commission determined that undergrounding to benefit one community at the expense of all of SCE's ratepayers raised a "serious question of reasonableness" in light of the considerable

expenses and far greater environmental impacts of undergrounding during construction. The Commission determined it would be “prohibitively expensive” to require underground construction every time a transmission line posed a visual impact to a community. Thus, the commenters suggestion for undergrounding to reduce visual impacts to the Four Seasons community, which is already adjacent to an existing right-of-way with an existing single-circuit subtransmission line, would be inconsistent with the Commission’s policies. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001-1003 [agency may reject alternative on policy considerations].)

Considering the increase in severity of construction impacts related to underground construction, the additional cost of underground construction, and the precedence that would be set for undergrounding subtransmission lines for the benefit of one community at the expense of all of SCE’s ratepayers, undergrounding of the 115 kV subtransmission line within the Beaumont boundaries is not feasible as an alternative or mitigation measure to reduce the visual impacts of the El Casco System Project.