

Comment Set E3

January 2008

EL CASCO DRAFT ENVIRONMENTAL IMPACT REPORT
SCE MITIGATION MEASURE COMMENTS

Mitigation Measure	Comment	Suggested Revision
Air Quality		
MM AQ-1a	MM AQ-1a is unnecessary because it contains SCE's proposed APMs which include BMPs and compliance with current laws and regulations. SCE has already committed to complying with the rules and regulations of the SCAQMD, which requires the submittal of a fugitive dust plan for approval by the SCAQMD. SCE will provide the CPUC with a courtesy copy of this document.	MM AQ-1a should be deleted.
MM AQ-3	As noted in SCE's comment table, a quantitative analysis of GHG should not be included in this DEIR. Furthermore, as discussed in SCE's cover letter, SCE currently tracks SF ₆ emissions on a system-wide basis. However, SCE does not currently track SF ₆ gas emissions for each individual substation, and does not currently have the technology and procedures in place to allow for substation-specific monitoring. Therefore, the mitigation measure as currently written is not feasible.	MM AQ-3 should be deleted.
Land Use		
MM LU-2a	Because the El Casco System Project construction will be phased over a two-year period and activities will occur at various times and at various locations, it would be ineffective and impractical to notify the public 30 days prior to the entire Proposed Project construction. SCE is committed to effective and timely coordination and communication with the public, especially with respect to impacts to public facilities. Therefore, SCE will document all outreach efforts and will, upon request by the CPUC, provide relevant documentation. Because of the long-term phased construction schedule this mitigation measure is not feasible as written.	Delete "30 days prior to construction".
MM LU-2b	This mitigation measure is overly burdensome and excessive. Due to weather conditions and other unanticipated events, SCE may not always know specifically where and when construction will occur. The linear aspect of this proposed project would require multiple mailings to be sent out, and publications to be made in local newspapers.	Revise MM LU-2b to represent the language agreed to in the Antelope Segment 2-3 Final EIR which reads as follows: "During construction, SCE or its construction contractor shall provide advance notice, between two and four weeks prior to construction, by mail to all residences and businesses that would be within 300 feet of construction. If any significant changes in scheduling were to occur, SCE would publish an updated notice in the local papers or send an updated Fact Sheet. Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction. SCE shall also publish a notice of impending construction in local newspapers,

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		stating when and where construction would occur."
Biological Resources		
MM B-1a	SCE does not agree with the following bullet under B-1a: "The majority of the El Casco substation site is dominated by ruderal non-native species. It does not make any sense, nor is it required by any regulation, to salvage this topsoil with a large non-native seed bank and use it elsewhere. Topsoil will be salvaged or seed bank collected only in locations where special status species are recently documented to occur and are not covered under the MSHCP."	Revise MSHCP reference and MM B-1a to remove the bulleted item.
MM B-3b	This requirement is included in the lease agreement with the County of Riverside, and SCE has already committed to use only native species for landscaping.	MM B-3b should be deleted.
MM B-4	MM B-4 is duplicative of SCE's APM BIO-2.	MM B-4 should be deleted.
MM B-5c	MM B-5c is duplicative of SCE's APM BIO-7.	MM B-5c should be deleted.
MM B-6	MM B-6 is excessive and not supported by regulation. CNPS List 1B and 4 species are not legally protected as are listed species. The designation by CNPS is intended to result in "special consideration" for avoidance during the environmental review process. In particular, requiring focused surveys and mitigation for potential impacts to CNPS List 4 plants that have lower conservation priority than CNPS List 1B plants is beyond normal mitigation requirements. According to the CDFG website, "plants on List 1A, 1B, and 2 on the CNPS inventory consist of plants that may qualify for listing and the Department recommends they be addressed in CEQA projects." Therefore, CNPS List 4 plants should not be included in the analysis. SCE will conduct preconstruction surveys for sensitive species. If they are located, they will be avoided to the greatest extent possible. Furthermore, with respect to the MSHCP directives in the mitigation measure, please note APM BIO-4 already states that SCE will comply with the guidelines in the MSHCP for the required plant species. In addition, APM BIO-11 covers other sensitive species not covered by the MSHCP. This mitigation measure is therefore not necessary.	<ul style="list-style-type: none"> MM B-6 should be deleted. Language on page D.4-73 under the analysis and recommended mitigation measures for Impact B-11 needs to be modified accordingly to remove MM B-6.
MM B-7	As noted in SCE's comment table, SCE is concerned that the host plants supporting the habitat for the Quino Checkerspot are not present. SCE has recommended that the significance criteria should be reduced to less than significant if host plants are not present in the project area.	MM B-7 should be deleted.
MM B-9	MM B-9 is duplicative of SCE's APM BIO-14.	MM B-9 should be deleted.
MM B-10	As noted in SCE's comment table, SCE has seen little evidence of subtransmission line collisions by listed bird species. Therefore SCE does not believe this is a significant impact requiring mitigation as noted in the DEIR analysis. In a recent review of dead bird reports of this area, SCE has not seen any listed species bird deaths resulting from subtransmission line collisions.	Because no significant impact is likely to occur, this mitigation measure should be deleted; however, please note, SCE generally constructs subtransmission lines in compliance with 2006 APLIC Guidelines.

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Mitigation Measure	Comment	Suggested Revision
MM B-13b	MM B-13b is excessive and not supported by regulation. Sensitive species are not legally protected in the same manner as listed species. The designation of "species of concern" by CDFG is intended to result in "special consideration" during the environmental review process. There is an extremely low likelihood that any of these species will be located and/or burrowing within the proposed El Casco Substation area.	MM B-13b should be deleted.
MM B-18	As previously noted in SCE's comment table, SCE will be conducting pre-construction surveys. If those surveys detect active burrows or nests, SCE will follow the mitigation measure accordingly. However, SCE does not anticipate badgers to be found within the Proposed Project area.	MM B-18 may not be needed pending outcome of pre-construction surveys.
MM B-19	MM B-19 is duplicative of SCE's APM BIO-1.	MM B-19 should be deleted.
Cultural Resources		
MM CR-3a	MM CR-3a is not consistent with common industry practice. A paleontological inventory is typically based on a literature search. Because of vegetation and other ground cover a field inspection of the Final APE would provide little, if any, additional information pertaining to significant paleontological resources.	Revise paragraph to read as follows: "Prior to construction, SCE shall submit for approval to the CPUC the locations where paleontological monitoring will occur based on the results and sensitivities detailed in the Paleontological Resources Literature Review."
MM CR-3e	MM CR-3e currently states: "SCE's paleontologist shall notify the CPUC and proceed with data recovery..."	Revise as follows: "SCE's assigned paleontologist or paleontological representative shall notify the CPUC and proceed with the data recovery..." The reason for this amendment is because SCE's archeologists typically manage the contract paleontologists.
Geology and Soils		
MM GEO-1	The Responsible Agency for MM GEO-1 should be the County of Riverside. In order for SCE to secure a grading permit from the County of Riverside, it will be submitting a geotechnical report and geotechnical plan sheets, which will be approved by the County. This County-approved report and plan will include the necessary geotechnical investigations, details and specific support documentation for the protection measures to be implemented at the substation site and certification of compliance of these measures.	Revise MM GEO-1 to clarify that upon approval by the County, SCE will provide a courtesy copy to the CPUC.
MM GEO-2	The Responsible Agency for MM GEO-2 should be the County of Riverside, not the CPUC. SCE believes that submitting a separate report to the CPUC, when it is already required to submit construction plans to the County of Riverside, may result in unnecessary delays from having to submit and reconcile construction plans to accommodate standards of two separate agencies.	Revise MM GEO-2 to clarify that SCE will provide courtesy copies of grading, paving, and erosion control plans with related permits approved by the local jurisdictional agencies to the CPUC. SCE will also provide courtesy copies of the investigative reports and relevant documents that provide support for protection measures to be implemented at the substation site.
MM GEO-3	To prevent unnecessary delays from having to submit and reconcile engineering plans to accommodate standards of two separate agencies, if the	Revise MM GEO-3 to state that the CPUC shall receive test results, geotechnical reports, and

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Mitigation Measure	Comment	Suggested Revision
	CPUC disagrees with the recommendations of the SCE geotechnical report, then a separate geotechnical consultant should be commissioned by the CPUC to provide a technically qualified second recommendation.	grading plans approved by local jurisdictional agencies, and foundation designs engineered to meet or exceed minimum standards of appropriate prevailing local, state, or federal requirements.
MM GEO-5a	Substations do not have control buildings; they have Mechanical Electrical Equipment Rooms, which are not subject to UBC because they are not habitable.	Revise MM GEO-5a to replace "control building" with "MEER."
MM GEO-5b	SCE designs facilities in compliance with CPUC General Order (GO) 95, GO 128, and accepted industry standards. Therefore, CPUC approval of design is not required.	Revise MM GEO-5b to delete "CPUC approval 60 days prior to construction."
MM GEO-7	SCE designs facilities in compliance with GO 95, GO 128, and accepted industry standards. Therefore, CPUC approval is not required.	Revise MM GEO-7 to delete "CPUC approval 60 days prior to construction."
Hazards and Hazardous Materials		
MM HAZ-9a	As noted in the comment table regarding Impact HAZ-9, conductor surface electric gradient issues only arise with transmission lines with voltage in excess of 200 kV.	MM HAZ-9a should be deleted.
MM HAZ-9b	SCE already provides a service to respond to these complaints throughout its service territory. Since this is a standard operating procedure at SCE, this mitigation measure is not required.	MM HAZ-9b should be deleted.
MM HAZ-10	As noted in SCE's comment table regarding Impact HAZ-10, SCE disagrees with the analysis. However, SCE already provides a service to respond to these complaints throughout its service territory. Since this is a standard operating procedure at SCE, this mitigation measure is not required.	MM HAZ-10 should be deleted.
Hydrology and Water Quality		
MM HYD-1b	This mitigation measure currently states that work "must occur during the dry season (April to October)." Although SCE will endeavor to comply with this measure, it may not always be feasible to avoid any work during the rainy season.	Revise MM HYD-1b to replace "must" with "should."
MM HYD-2d	Encountering groundwater during construction activities does not necessarily mean that the water is contaminated and requires remediation. It is anticipated that groundwater will be encountered during the project-related construction activities at the El Casco Substation site and at portions of the subtransmission route. In the event that SCE is involved in an EPA or RWQC reportable spill incident, SCE's environmental organization will initiate a groundwater investigation to determine if groundwater remediation is warranted at the spill site.	MM HYD-2d reflects BMPs and should be deleted.
MM HYD-7	SCE designs facilities in compliance with GO 95, GO 128, and accepted industry standards. Furthermore, no structures will be placed within any drainage or wash. There are two existing poles within drainages that will be removed. Impacts to riparian vegetation will occur and be minimized to the greatest extent possible in all locations.	MM HYD-7 should be deleted.

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Mitigation Measure	Comment	Suggested Revision
Public Services and Utilities		
MM U-1a	As part of the 2003 General Rate Case, SCE has already implemented a Service Guarantee program, which requires SCE to notify customers of a planned outage at least three calendar days before an event. Therefore, this mitigation measure is not required or necessary.	MM U-1a should be deleted.
MM U-1b	California law already requires parties to contact utilities when they do any excavation relating to underground construction ("Underground Service Alert"). Further, SCE closely coordinates with its fellow utilities, such as Southern California Gas Company, on all underground projects in its service area. Therefore, this mitigation measure is not required or necessary.	MM U-1b should be deleted.
Transportation and Traffic		
MM T-1a	This is duplicative of MM T-1c.	MM T-1a should be deleted.
MM T-1b	This is duplicative of MM T-1c.	MM T-1b should be deleted.
MM T-1d	This is duplicative of MMT-1c.	MM T-1d should be deleted.
MM T-3	Coordination with emergency responders is already addressed by SCE when it prepares Traffic Control Plans and works with the respective local agencies. This matter would be handled under MM T-1c. Therefore, no separate mitigation measure is needed.	MM T-3 should be deleted.
MM T-4	This requirement is already addressed in SCE's proposed revision to MM LU-2b. A separate measure here would be duplicative.	MM T-4 should be deleted.
MM T-5	This mitigation measure would be handled under MM T-1c. No separate mitigation measure should be required.	MM T-5 should be deleted.
MM T-6	This mitigation measure would be handled under Mitigation Measure T-1c. No separate mitigation measure should be required.	MM T-6 should be deleted.
MM T-8	This mitigation measure would be handled under Mitigation Measure T-1c. No separate mitigation measure should be required.	MM T-8 should be deleted.
MM T-9	As noted on comment table, this mitigation measure is redundant. SCE is a state regulated utility and is subject to the Franchise Act of 1937, and is required to pay the local agency the cost of all "repairs made necessary by its operation under franchise." (California Public Utilities Code Section 6295) SCE is already contractually obligated to repair the property to its original condition. Therefore, this mitigation measure is not required or necessary.	MM T-9 should be deleted.
Visual Resources		
MM V-1a	SCE plans to comply with this mitigation measure. However, SCE disagrees with the need for CPUC review and approval as SCE will be working closely with local jurisdictional agencies and meeting their requirements for reducing visual impacts due to construction activities and equipment. SCE will provide the CPUC with a courtesy copy of these locally approved documents.	Revise MM V-1a accordingly.
MM V-1b	SCE plans to comply with the intent of this mitigation measure by minimizing nuisance lighting to nearby receptors. However, SCE disagrees with the need for CPUC review and approval as SCE will be working closely with local jurisdictional agencies and meeting their requirements for reducing visual	Revise MM V-1b accordingly.

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Mitigation Measure	Comment	Suggested Revision
	impacts due to construction activities and equipment. SCE will provide the CPUC with a courtesy copy of these locally approved documents. Please also refer to APM BIO-7.	
MM V-2a	SCE is already required to obtain ministerial permits, as necessary, from local jurisdictional agencies. To prevent unnecessary delays from having to submit and reconcile approvals to accommodate standards of two separate agencies, SCE will provide the CPUC a courtesy copy of the locally approved documents.	Revise MM V-2a as follows: "SCE shall provide the CPUC with copies of landscape plans and applicable permits approved by the local jurisdictional agencies. SCE will also meet the local jurisdictional requirements for reducing visual impacts to land scars."
MM V-2b	SCE is already required to obtain ministerial permits, as necessary, from local jurisdictional agencies that meet their requirements. To prevent unnecessary delays from having to submit and reconcile approvals to accommodate standards of two separate agencies, SCE will provide the CPUC a courtesy copy of the locally approved documents.	Combine MM V-2b with MM V-2a, as amended above.
MM V-3a	SCE is already required to obtain ministerial permits, as necessary, from local jurisdictional agencies that meet their requirements. To prevent unnecessary delays from having to submit and reconcile approvals to accommodate standards of two separate agencies, SCE will provide the CPUC a courtesy copy of the locally approved documents.	Combine MM V-3a with MM V-2a, as amended above.
MM V-3b	MM V-3b is duplicative of MM V-1b.	MM V-3b should be deleted.
MM V-10	Per SCE's comment in the Visual Resources section, SCE disagrees that MM V-10 is required. If the CPUC still determines that visual mitigation is required at Zanja Substation, SCE will provide the CPUC courtesy copies of the Zanja Substation landscaping plans approved by the local jurisdictional agencies, along with the local applicable permits.	MM V-10 should be deleted.

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Responses to Comment Set E3 – Southern California Edison Company

E3-1 The SCAQMD-required fugitive dust plan, by rule, would likely only be required for the El Casco substation construction, while the fugitive dust plan required to be provided to the CPUC needs to cover all construction activities with fugitive dust potential where the APMs/BMPs would need to be applied. This is particularly important with regard to unpaved road fugitive dust control along the subtransmission construction route, which is the primary fugitive dust emission source by quantity of emissions for the Proposed Project. Therefore, MM AQ-1a has not been revised.

E3-2 See Response E1-9. This EIR uses a quantitative threshold which is appropriate under CEQA. “A threshold of significance is an identifiable quantitative, qualitative, or performance level.” 14 Cal. Code Regs. § 15064.7(a). Because SF₆ leak detection and monitoring systems are available to implement this measure, it is feasible to implement and need not be deleted. However, the mitigation measure has been revised in response to SCE’s comment letter dated October 7, 2008. Please see Response to Comment E5-1. The revisions to Mitigation Measure AQ-3 are as follows:

AQ-3 Avoid Sulfur Hexafluoride Emissions. SCE shall ensure that Project equipment, specifically the circuit breakers at the El Casco Substation, maintain a leakage rate of 0.5 percent per year or less for sulfur hexafluoride (SF₆). To accomplish this, SCE shall include this limit as a performance specification for the circuit breakers that would be installed as part of the Project. Maintenance, repair, and replacement of all circuit breakers shall be in a manner that ensures continued compliance with this performance specification. SCE shall demonstrate compliance with this limit by submitting an annual report of SF₆ emissions for the El Casco Substation to the CPUC. This report should contain information regarding leaks that are detected at the substation and the actions that were taken to address such occurrences. The annual SF₆ emission rate is defined as total SF₆ emissions from the El Casco Substation for the most recent reporting year divided by total name-plate capacity of SF₆ at the El Casco Substation (i.e., the total quantity of SF₆ contained in electrical equipment at the end of the reporting year). The annual report of SF₆ emissions at the El Casco Substation shall be submitted to the CPUC until the California Air Resources Board enacts a program to report and restrict SF₆ emissions from the electricity sector under the California Global Warming Solutions Act of 2006 (AB32). SCE shall report SF₆ emissions to the California Climate Action Registry (CCAR) according to CCAR methodologies or alternate methodology approved by the California Air Resources Board. This report shall include the El Casco Substation and indirect GHG emissions from energy imported and consumed to support operation of the system and indirect GHG emissions from transmission and distribution losses.

~~**AQ-3 Avoid Sulfur Hexafluoride Emissions.** SCE shall identify sulfur hexafluoride (SF₆) leaks and establish a strategy for replacing leaking equipment to reduce SF₆ leaks. To accomplish this, SCE shall develop and maintain a record of SF₆ purchases, an SF₆ leak detection and repair program using laser imaging leak detection and monitoring no less frequently than quarterly, an SF₆ recycling program, and an~~

~~employee education and training program for avoiding or eliminating SF₆ emissions caused by the Proposed Project. The SF₆ leak detection and repair program shall be provided to the CPUC 90 days prior to project operation. SCE shall also report SF₆ emissions from the Proposed Project to the California Climate Action Registry (CCAR) according to CCAR methodologies or alternate methodology approved by the California Air Resources Board. To develop a complete GHG inventory, SCE shall follow established methodologies to report indirect GHG emissions from energy imported and consumed to support operation of the Proposed Project and indirect GHG emissions from transmission and distribution losses associated with the Proposed Project.~~

E3-3 The Mitigation Measure has been revised as follows [See Final EIR (April 2008), Section 4.6 (Section D.3 – Land Use)]:

LU-2a **Coordinate Construction Schedule with Public and Community Facilities.** SCE shall coordinate with public and community facilities and services regarding the construction schedule and duration in order to minimize impacts to these land uses. The purpose of this measure is to work with sensitive land uses that would be impacted by construction and to identify construction times/periods that would have the least impact to peak use of these public and community facilities. This coordination could result in limiting or avoiding construction during peak facility uses. ~~Thirty days prior~~ Prior to construction at a particular location or construction spread, SCE shall document its coordination efforts including contact persons, information provided, and comments received, and submit this documentation to the CPUC.

E3-4 The Mitigation Measure referenced was intended to mitigate noise impacts of the Antelope Transmission Project Segments 2 and 3. The Mitigation Measure SCE is commenting on for the El Casco System Project is intended to mitigate impacts to land use. Therefore, no changes have been made. It should be noted that MM LU-2b requirements for notification of the public fall within the two- to four-week time frame stated in the noise Mitigation Measure cited by SCE.

E3-5 This comment pertains to salvage of topsoil at the El Casco Substation site. The intent of topsoil salvage is not to retain the non-native seed bank that is likely present, but rather to salvage the biologically active soils that are present in the first few inches of soil. The CPUC recognizes that large areas of soils would likely be removed from the site from mass grading and the intent of the Mitigation Measure is not to salvage all soils. The intent is to save soils in areas adjacent to the site that have been disturbed by project grading. No change to the Mitigation Measure has been made.

E3-6 Please see Response E2-53. No change to the Mitigation Measure has been made.

E3-7 Mitigation Measure B-4 clarifies the APM proposed by SCE. In addition, the Mitigation Measure provides for flexibility and enforcement regarding the development of buffers surrounding nest sites. No change to the Mitigation Measure has been made.

E3-8 Please see Response E3-7. No change to the Mitigation Measure has been made.

E3-9 Please see Response E2-67. The lead agency has the legal mandate to evaluate what species are important under CEQA. However, the SCE comment regarding List 4 plants is valid provided the plants are not regionally unique. Therefore Mitigation Measure B-6 has been modified to reflect the comment as follows [See Final EIR (April 2008), Section 4.7 (Section D.4 – Biological Resources)]:

B-6 **Conduct Surveys for Sensitive Plant Species and Flag for Avoidance.** SCE shall conduct focused surveys prior to construction during the floristic period appropriate for each of the sensitive plant species identified in Table D.4-3 with the potential to occur within the Project ROW *and* within 100 feet of all surface-disturbing activities. Populations of sensitive plants shall be flagged and mapped prior to construction. If sensitive plants (CNPS List 1A, 1B, or 2) are located during the focused surveys, then modification of the placement of structures, access roads, laydown areas, and other ground-disturbing activities would be implemented in order to avoid the plants. If listed plant species or species requiring 90 percent avoidance by the MSHCP cannot be avoided, SCE shall avoid the plants until authorized to proceed through the context of a Biological Opinion and authorized through the MSHCP Determination of Biologically Equivalent or Superior Preservation process.

E3-10 Please see Response E2-61. No change to the Mitigation Measure has been made.

E3-11 Please see Response E3-7. The mitigation suggests SCE utilize the updated APLIC guidelines. No change to the Mitigation Measure has been made.

E3-12 Please see Responses E2-64 and E2-65. No change to the Mitigation Measure has been made.

E3-13 Please see Response E3-7. No change to the Mitigation Measure has been made.

E3-14 Please see Response E2-44. No change to the Mitigation Measure has been made.

E3-15 Please see Response E3-7. The Mitigation Measure is not onerous and clarifies the intent of the existing APM. No change to the Mitigation Measure has been made.

E3-16 Because Mitigation Measure CR-3a is taken from SCE's Paleontological Resource Literature Review, MM CR-3a was not changed according to the suggested revision, but was altered, in the text and the MMP table, to be more flexible [See Final EIR (April 2008), Section 4.8 (Section D.5 – Cultural and Paleontological Resources)]:

CR-3a **Inventory Paleontological Resources in Final APE.** Prior to construction, SCE shall conduct and submit for approval to the CPUC an inventory of potentially significant paleontological resources, based, in part, on field inspection of areas of high or undetermined paleontological sensitivity that would be affected by the project.

E3-17 Mitigation Measure CR-3e has been revised to reflect the comment as appropriate [See Final EIR (April 2008), Section 4.8 (Section D.5 – Cultural and Paleontological Resources)]:

CR-3e **Train Construction Personnel.** All construction personnel shall be trained regarding the recognition of possible buried paleontological resources and

protection of all paleontological resources during construction, prior to the initiation of construction or ground-disturbing activities. SCE shall complete training for all construction personnel. Training shall inform all construction personnel of the procedures to be followed upon the discovery of paleontological materials.

Upon discovery of potential buried paleontological materials by paleontologists or construction personnel, work in the immediate area of the find shall be diverted and SCE's paleontologist notified. Once the find has been inspected and a preliminary assessment made, SCE's assigned paleontologist shall notify the CPUC and proceed with data recovery in accordance with the approved Treatment Plan consistent with Mitigation Measure CR-3b (Develop Paleontological Monitoring and Treatment Plan).

E3-18 No revisions are necessary. As discussed in detail in Draft EIR Section G (Mitigation Monitoring and Reporting), "The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval be implemented properly, monitored, and reported. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a MMCRP when it approves a project that is subject to preparation of an EIR, and where the EIR for the project identifies significant adverse environmental effects. CEQA Guidelines Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting." Therefore, the CPUC retains the right to review and approve all measures as described in Mitigation Measure GEO-1. Furthermore, as indicated in the Mitigation Monitoring Program the responsible agencies listed for this Mitigation Measure are CPUC and the local planning agencies, which in this case would be the County of Riverside.

E3-19 As described above for Response E3-18, the CPUC retains the right to review and approve all measures as described in Mitigation Measure GEO-2. Furthermore, Mitigation Measure GEO-2 does not require SCE to submit a different or separate plan to CPUC than would be submitted to Riverside County. However, the Mitigation Monitoring Program has been modified to include local planning agencies as responsible agencies in addition to CPUC.

E3-20 No revisions are necessary. As described above in Response E3-18, the CPUC retains the right to review and approve all measures as described in Mitigation Measure GEO-3.

E3-21 The text has been revised as follows [See Final EIR (April 2008), Section 4.9 (Section D.6 – Geology and Soils)]:

GEO-5a Reduce Effects of Groundshaking. The design-level geotechnical investigations performed by SCE shall include site-specific seismic analyses to evaluate the peak ground accelerations for design of Project components. The Applicant shall follow the Institute of Electrical and Electronics Engineers (IEEE) 693 "Recommended Practices for Seismic Design of Substations," which has specific requirements to mitigate the types of damage that equipment at substations have had in the past from such seismic activity. These design guidelines shall be implemented during construction of substation

~~modifications. Substation control buildings shall be designed in accordance with the 2001 California Building Code for sites in Seismic Zone 4 with near field factors.~~

- E3-22** No revisions are necessary. As described above in Response E3-18, the CPUC retains the right to review and approve all measures as described in Mitigation Measure GEO-5b.
- E3-23** No revisions are necessary. As described above in Response E3-18, the CPUC retains the right to review and approve all measures as described in Mitigation Measure GEO-7.
- E3-24** This information was not provided in the comment table regarding Impact HAZ-9, that comment simply noted that there is no evidence that the existing subtransmission line has caused any radio or television interference and that SCE believes that any interference that might occur would likely remain the same as currently exists. ~~However, as discussed in response E2-95, the fact that SCE has not received reports of radio or television interference from the existing subtransmission line does not mean such interference has not occurred in the past nor does it eliminate the possibility for such interference to occur. Additionally, due to the rapid rate of residential development in the project area, it is likely that residences will continue to be constructed in close proximity to the subtransmission line. Therefore to ensure that this impact would not occur, Mitigation Measures HAZ-9a and HAZ-9b, as presented in the EIR, are recommended.~~ As shown in Recirculated Final EIR Section 4.2 (Revisions to the Draft EIR, Section D.7 – Hazards and Hazardous Materials), the analysis of Impact HAZ-9 has been updated. Independent analysis conducted by the CPUC has determined that the Proposed Project would not result in a conductor surface electrical gradient, as this condition does not occur on subtransmission lines energized at less than 200 kV. Therefore, radio/television/equipment interference would not increase over existing conditions and this impact would be less than significant (Class III). Consequently, no mitigation is required and Mitigation Measures HAZ-9a and HAZ-9b have been removed.
- E3-25** No revisions are necessary. No APMs or other information was provided to the EIR authors to indicate that SCE provides this complaint service. Furthermore, Mitigation Measure HAZ-9b includes provisions to allow CPUC a mechanism to review how complaints are resolved.
- E3-26** No revisions are necessary. SCE states that grounding measures included in Mitigation Measure HAZ-10 would be implemented as standard construction practice. Since these standard construction practices were not made available to the authors of the EIR, Mitigation Measure HAZ-10 is recommended to ensure impacts would not occur.
- E3-27** The language in Mitigation Measure HYD-1b has been revised as follows [See Final EIR (April 2008), Section 4.11 (Section D.8 – Hydrology and Water Quality)]: “Construction activities, particularly regarding roadway installations and improvements, ~~must~~ should occur during the dry season (April to October) or when precipitation events are not expected.” The measure indicates that construction activities shall occur during the dry season (April to October) *or when precipitation events are not expected*. This language allows the construction contractor latitude to perform construction activities between November and March providing precipitation events are not forecast to occur. Furthermore the monitoring requirement for this measure indicates that the onsite monitor will verify that no construction occurs during periods of heavy rain, again providing latitude to perform construction outside of the dry season.

E3-28 Thank you for the comment. Mitigation Measure HYD-2d was recommended to strengthen the intent of APM-HYDRO-4 by requiring specific measures react to potential groundwater contamination as well as to provide a mechanism for monitoring and reporting to CPUC. The text of Mitigation Measure HYD-2d has been revised for clarification of the specific steps that should be included [See Final EIR (April 2008), Section 4.11 (Section D.8 – Hydrology and Water Quality)]:

HYD-2d **Develop and Implement a Groundwater Remediation Plan.** ~~SCE shall develop and implement a groundwater remediation plan in the event that groundwater is encountered during Project related construction activities at the El Casco Substation Site or along the subtransmission route from MP 0 to Maraschino Substation.~~ In the event that ~~unknown~~ groundwater resources are encountered ~~or an unplanned disturbance of known resources occurs~~, SCE shall immediately halt the ~~disruptive excavation activity and~~ ground disturbing activities and conduct appropriate water testing in compliance with State and federal regulations. If the water is determined to be contaminated, SCE shall develop and implement a site-specific remediation plan to prevent contamination of surrounding groundwater. If dewatering is necessary, SCE shall comply with state and federal regulations regarding discharge of groundwater to adjacent surface water bodies. ~~This remediation plan may require activities such as bioremediation or other applicable technology, as determined appropriate under site specific conditions.~~

E3-29 Since these standard construction practices were not made available to the authors of the EIR, Mitigation Measure HYD-7 was recommended to ensure impacts would not occur.

E3-30 As stated in Draft EIR Section D.10.3.3, Proposed Project Impact Analysis, on Page D.10-5, this discussion pertains to the risk of accidental upset of existing utility lines within the street, such as natural gas and water pipelines that could potentially be temporarily disrupted during planned construction of the underground fiber optic cable installation. The SCE 2003 General Rate Case cited within this comment pertains to electricity outages, and does not cover disruption to other utility providers.

E3-31 Draft EIR Section D.10.3.3, Proposed Project Impact Analysis, on Page D.10-5, the following sentence has been added to the last paragraph of Impact U-1 discussion [See Final EIR (April 2008), Section 4.13 (Section D.10 – Public Services and Utilities)]: “While it is unlikely that underground facilities would be located in proximity to natural gas and water pipelines, and SCE is required to probe for existing buried utilities prior to any excavation work, potential utility disruptions cannot be ruled out.”

E3-32 Mitigation Measure T-1c within Draft EIR Section D.11.3.3, Proposed Project Impact Analysis, requires the construction contractor to prepare Transportation Management Plans (TMPs) prior to the start of construction. This measure only requires that TMPs shall define the locations of all roads that would need to be temporarily closed due to construction activities, including aerial hauling by helicopter, hauling of oversized loads by truck, and conductor stringing activities. Mitigation Measures T-1a, T-1b, and T-1d further define and minimize impacts from required lane closures limitations outside of just identifying them within TMPs, and ensure that during preparation of TMPs impacts resulting from lane closures are reduced to the maximum extent feasible. The measure is not duplicative and Mitigation Measure T-1c has not been deleted.

- E3-33** This comment pertains to the addition of Mitigation Measures T-1a, T-1b, and T-1d to further supplement Mitigation Measure T-1c, which requires preparation of TMPs. See Response E3-32.
- E3-34** This comment pertains to the addition of Mitigation Measures T-1a, T-1b, and T-1d to further supplement Mitigation Measure T-1c, which requires preparation of TMPs. See Response E3-32.
- E3-35** As discussed in Response E3-32, Mitigation Measure T-1c only defines the requirement of the construction contractor to provide input and garner approval from responsible public agencies overseeing public roadways. Mitigation Measure T-3 further defines the TMP requirements and independent coordination to include that emergency service providers (including police departments, fire departments, and ambulance services) be contacted. This additional measure is provided to ensure that potential impacts restricting movements of emergency vehicles are reduced to the maximum extent feasible. The measure is not duplicative and Mitigation Measure T-3 has not been deleted.
- E3-36** Please see Response E3-4. No changes have been made.
- E3-37** As discussed in Response E3-32, Mitigation Measure T-1c only defines the requirement of the construction contractor to provide input and garner approval from responsible public agencies. Mitigation Measure T-5 further defines that the TMPs minimize the length of any temporary parking restrictions, develop appropriate sign postings, and specify the process for communicating with affected residents. This additional measure is provided to ensure that potential impacts to residential and business parking are reduced to the maximum extent feasible. The measure is not duplicative and Mitigation Measure T-5 has not been deleted.
- E3-38** As discussed in Response E3-32, Mitigation Measure T-1c only defines the requirement of the construction contractor to provide input and garner approval from responsible public agencies overseeing public roadways. Mitigation Measure T-6 further defines the TMP requirements to consult with all affected School Districts at least one month prior to construction to coordinate construction activities adjacent to school bus stops. This additional measure is provided to ensure that potential impacts to school bus stops and routes are reduced to the maximum extent feasible. The measure is not duplicative and Mitigation Measure T-6 has not been deleted.
- E3-39** As discussed in Response E3-32, Mitigation Measure T-1c only defines the requirement of the construction contractor to provide input and garner approval from responsible public agencies overseeing public roadways. Mitigation Measure T-8 further defines the TMP requirements to include that where construction activity results in bike lane closures appropriate detours and signs shall be provided, and where trenching disrupts bicycle travel on streets, and the use of plates to cover trenches shall be in accordance with the permit requirements of the local jurisdiction. This additional measure is provided to ensure that impacts to bicycle movements are reduced to the maximum extent feasible. The measure is not duplicative and Mitigation Measure T-6 has not been deleted.
- E3-40** In order to incorporate the suggestion in the comment, the following text has been added to Draft EIR Section D.11.3.3 on Page D.11-12 [See Final EIR (April 2008), Section 4.14 (Section D.11 – Transportation and Traffic)]: “It should be noted that SCE is a State-regulated utility and is subject to the Franchise Act of 1937. Under the Act, SCE is required

to pay the local agencies the cost of all repairs made necessary by its operation under franchise (CPUC Code Section 6295).” However, the revision language only addresses repairs made necessary by SCE operation. Suggested Mitigation Measure T-9 has not been deleted. Retaining this measure will help ensure that any road damage resulting from Proposed Project construction activities is repaired.

- E3-41** As a general practice, CPUC retains the right to review and approve all project construction plans and related activities. Please see Response E3-18. Therefore, Mitigation Measure V-1a has not been revised.
- E3-42** As a general practice, CPUC retains the right to review and approve all project construction plans and related activities. Please see Response E3-18. Therefore, Mitigation Measure V-1b has not been revised.
- E3-43** As a general practice, CPUC retains the right to review and approve all project construction plans and related activities. Please see Response E3-18. Therefore, Mitigation Measure V-2a has not been revised.
- E3-44** As a general practice, CPUC retains the right to review and approve all project construction plans and related activities. Please see Response E3-18. Therefore, Mitigation Measure V-2b has not been revised.
- E3-45** As a general practice, CPUC retains the right to review and approve all project construction plans and related activities. Please see Response E3-18. Therefore, Mitigation Measure V-3a has not been revised.
- E3-46** Mitigation Measure V-1b applies to temporary night lighting during construction. Mitigation Measure V-3b applies to permanent facility night lighting. Therefore, Mitigation Measure V-3b has not been deleted.
- E3-47** CPUC has determined that mitigation measures for Class III Visual Impacts are not warranted (Impact V-10 has been re-classified to Class III). Therefore, Mitigation Measure V-10 has been deleted.