

ADDENDUM
to
Final Environmental Impact Report

**Southern California Edison's
West of Devers Upgrade Project**

SCH #2014051041

California Public Utilities Commission

April 2016



SCE West of Devers Upgrade Project Final EIR

California SCH #2014051041

To: Interested Readers
From: Billie C. Blanchard, CPUC, EIR Project Manager
Subject: Notice of Availability, ADDENDUM to Final Environmental Impact Report for SCE's Proposed West of Devers Upgrade Project
Date: April 12, 2015

The California Public Utilities Commission (CPUC), as Lead Agency under the California Environmental Quality Act (CEQA), has prepared the attached **Addendum** to the Final Environmental Impact Report (Final EIR) for consideration of Southern California Edison Company's (SCE) application to build and operate the West of Devers (WOD) Upgrade Project (Proposed Project). The Final EIR was published on December 11, 2015.

A Draft EIR and Environmental Impact Statement (EIR/EIS) was published on August 7, 2015 by the CPUC and the U.S. Bureau of Land Management (BLM). The BLM has not yet published its Final EIS for National Environmental Policy Act (NEPA) compliance; it is expected to be published later in 2016. All parties on the project notification list will be informed when the Final EIS is published.

CEQA Requirements for an Addendum

Under CEQA Guidelines Section 15164, an Addendum presents changes to an EIR that are not significant enough to require a Supplemental EIR. A Supplemental EIR would only be required if, as defined in Section 15162(a)(1), (a) there have been substantial changes to the Proposed Project; (b) new significant environmental effects have been identified; or (c) there has been a substantial increase in the severity of previously identified significant effects;

The Proposed Project has not changed, but the attached Addendum defines some slight alterations to the Phased Build Alternative that have been made in response to SCE filings with the CPUC. This alternative has been modified, but as detailed in the Addendum, there are no new impacts and no impacts have increased in severity from those defined in the Final EIR. Additionally, SCE also requested modifications to text of the Final EIR, including mitigation measures. In response, minor changes have been made clarifying mitigation text. These modifications do not change the intent or strength of any construction requirements or mitigation measure; therefore, no new significant impacts have been identified and no impacts have increased in severity from those defined in the Final EIR.

Changes made to the Final EIR in this Addendum are shown using ~~strikeout~~ and underlined text.

CEQA Guidelines Section 16164(c) states that "an Addendum need not be circulated for public review." There is no public comment period required in connection with an Addendum. While circulation of an Addendum is not required, the CPUC has determined that it would be beneficial to the public and the parties to the CPUC's General Proceeding to see the changes that have been made.

However, because public review is not required, and impact determinations have not been modified, there is no opportunity for comment on this document.

Availability of the Addendum to the Final EIR

The Addendum to the Final EIR is attached to this letter, and is also available on the project website at:

<http://www.cpuc.ca.gov/environment/info/aspn/westofdevers/westofdevers.htm>

Questions about this document may be directed to the project team:

E-mail: westofdevers@aspn.ca.gov or Phone or fax at (888) 456-0254.

CEQA Process and CPUC General Proceeding

The CPUC is releasing this Addendum at the same time as its Proposed Decision. In its Decision, the CPUC will consider the adequacy of the Addendum to the Final EIR along with the Final EIR itself. If the CPUC finds these documents to be adequate, it will certify the documents as compliant with CEQA. For further information on the CPUC's decision-making process, call the CPUC Public Advisor at (866) 849-8390 or (415) 703-2074 or email public.advisor@cpuc.ca.gov.

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Addendum to Final EIR

Introduction

The California Public Utilities Commission (CPUC), as Lead Agency under the California Environmental Quality Act (CEQA), has prepared this **Addendum** to the Final Environmental Impact Report (Final EIR) for consideration of Southern California Edison Company's (SCE) application to build and operate the West of Devers (WOD) Upgrade Project. The Final EIR was published on December 11, 2015.

A Draft EIR and Environmental Impact Statement (EIR/EIS) was published on August 7, 2015 by the CPUC and the U.S. Bureau of Land Management (BLM). The BLM has not yet published its Final EIS for National Environmental Policy Act (NEPA) compliance; it is expected to be published later in 2016.

CEQA Requirements for an Addendum

Under CEQA Guidelines Section 15164, an Addendum presents changes to an EIR that are not significant enough to require a Supplemental EIR. A Supplemental EIR would be required if, as defined in Guidelines Section 15162(a)(1): (a) there have been substantial changes to the Proposed Project; (b) there have been identification of new significant environmental effects; or (c) there has been a substantial increase in the severity of previously identified significant effects;

The Proposed Project and its impact analysis have not changed, but the attached Addendum defines changes to the Phased Build Alternative that have been made in response to SCE filings with the CPUC after publication of the Final EIR. The alternative has been modified, but as defined in the subsequent pages, there have been no new impacts defined and no impacts have increased in severity from those defined in the Final EIR.

CEQA Guidelines Section 16164(c) states that "an Addendum need not be circulated for public review." Because public review is not required, and impact determinations have not been modified, there is no opportunity for comment on this document.

Contents of the Addendum

Additional information from SCE on the Phased Build Alternative (PBA) was submitted by SCE in filings to the CPUC. In its Opening Brief on January 15, 2016, SCE also requested modifications to text of the Final EIR, including mitigation measures. In response, this Addendum includes changes to the following sections of the Final EIR:

- Executive Summary
- Section A (Introduction)
- Section D.4 (Biological Resources – Vegetation)
- Section D.5 (Biological Resources – Wildlife)
- Section D.13 (Noise)
- Section D.18 (Visual Resources)
- Section D.19 (Water Resources and Hydrology)
- Section G (Comparison of Phased Build Alternative with Proposed Project)
- Section H (Mitigation Monitoring and Reporting)
- Appendix 5 (Alternatives Screening Report)

Changes made to the contents of the Final EIR are shown using ~~strikeout~~ and underlined text in this Addendum.

These changes do not affect the conclusion of the Draft and Final EIR that the Phased Build Alternative is environmentally superior to the Proposed Project. The changes would somewhat increase the impacts of the PBA, but the overall reduction in construction activity and ground disturbance of 20 percent to 25 percent remains a substantial benefit of the PBA in comparison with the Proposed Project.

Following the modifications to the Final EIR, this Addendum also provides responses of the CEQA team to specific issues raised in SCE's Opening Brief. The only issues addressed in this Addendum are those related to the CEQA process or contents of the Final EIR. There are three sections of supporting documentation presented under this heading:

- SCE's Opening Brief, Major issues
- SCE's Opening Brief, Appendix A (Suggested changes to mitigation measures)
- SCE's Opening Brief, Appendix B (Suggested changes to Phased Build Alternative).

CEQA Process and CPUC General Proceeding

The CPUC is releasing this Addendum at the same time as its Proposed Decision. In its Decision, the CPUC will consider the adequacy of the Addendum to the Final EIR along with the Final EIR itself. If the CPUC finds these documents to be adequate, it will certify the documents as compliant with CEQA.

Availability of the Addendum to the Final EIR

This Addendum has been mailed to recipients of a hard copy of the Final EIR and/or standalone Executive Summary, who are not also on the CPUC's Service List for the project.

In addition, this Addendum to the Final EIR is available on the project website at:

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

Executive Summary

This Addendum modifies only Sections ES.3.2 and ES.6.2 of the Final EIR's Executive Summary.

ES.3.2 Alternatives Fully Evaluated in the EIR

Phased Build Alternative

This alternative was developed to avoid most of the environmental impacts associated with removal of the existing double-circuit towers and ~~construction~~ their replacement with ~~of~~ new double-circuit towers, while still allowing import of generation from generation projects that the CAISO has determined to be most realistic. This was evaluated through independent power flow modeling to determine whether the alternative would satisfy the CAISO's 2024 Reliability Base Case, which includes the generation that was under construction or had received regulatory approval at the time of CAISO's 2013/2014 transmission planning process.¹

Description. The alternative is derived from the project proposed by SCE in 2005 as the West of Devers System Upgrades portion of the DPV2 project. The purpose of this alternative is to reduce construction by retaining as many existing tower structures as possible and installing lighter-weight but higher-performance conductors on the retained towers. The high-performance conductors would maximize power transfer and, with addition of some interset structures, avoid structurally overloading the existing towers. ~~In this alternative, the existing 66 kV subtransmission system would not be affected and the replacement 66 kV line that would move to Iowa Street under the Proposed Project would not be required.~~

The alternative would:

- **Remove and replace existing single-circuit towers.** The two sets of existing single-circuit towers would be removed and one set of new double-circuit towers would be constructed to replace the removed towers. The new set of double-circuit towers would be constructed in the locations defined in the Tower Relocation Alternative (see Appendix 5, Section 4.2, as modified in this Addendum).
- **Retain existing double-circuit towers.** The existing double-circuit towers would be retained. In the Final EIR, it was assumed that prior to reconductoring, up to 30 percent of the existing structures would need to be replaced or modified to provide increased strength and/or their heights increased. However, given the added interset structures, most of these structures would no longer need to be replaced. Most of the approximately 160 structures would be retained (not demolished and rebuilt as would occur with the Proposed Project).
- **Install interset towers where required.** Up to 110 interset structures would be required in Segments 3, 4, and 6. These structures would be needed where the spans between retained towers exceed the strength of existing towers, and at locations where conductor blowout (where conductors could sway horizontally, potentially result in insufficient horizontal safety clearance to the adjacent line) could occur.
- **Install high-capacity conductors on all four circuits.** Both the new and existing 220 kV double-circuit towers would have the "795 Drake" Aluminum Conductor Composite Reinforced (ACCR) installed, with the exception of Segment 1, where only two of the existing four circuits would be modified.

¹ The Phased Build Alternative would have capacity for all the generation included in the CAISO 2024 Reliability Base Case (see EIR/EIS Appendix 5 (Alternatives Screening Report), Attachment 2, pages 5-6 and Table A4). This scenario includes 3,754 MW of Total Generation On-line and 6,901 MW of Total Generation Capacity, as well as the power flow on the system resulting from import of 1,400 MW from the Imperial Irrigation District into the Los Angeles Basin.

- **Either retain or relocate the existing 66 kV circuits, based on final design.** If the 66 kV circuits are required to be relocated, the Iowa Street 66 kV Underground Alternative would be preferred (as it is with the Proposed Project). If the 66 kV circuits are not relocated, there would be no need to implement the Iowa Street Underground Alternative.
- **Allow for future capacity expansion within the existing corridor** with several optional future phases. These phases would be implemented as generation projects become certain and capacity is clearly required. Because the Phased Build Alternative would accommodate projects now defined in the CAISO's 2024 Reliability Base Case, it may be 10 years before additional upgrades are needed. The future phases could include:
 - Reconductoring the newly constructed 220 kV structures with higher capacity conductors;
 - If required (based on assessment of structure strength with added interset structures), replacing some of the retained 220 kV structures with new, stronger 220 kV structures in order to carry heavier, higher capacity conductors;
 - Installing a single- or double-circuit 500 kV or 220 kV line in the vacant space remaining in the ROW.

The components of this alternative are shown on Figure Ap.5-5b (at the end of this Addendum) ES-2.

In Segment 5, the Phased Build Alternative structures on Morongo land would look exactly very much like those the Proposed Project, and would incorporate the Morongo relocation of a part of the ROW and the use of tubular steel poles. While the Morongo Band has a conditional contractual right to terminate its ROW Agreement with SCE, the Phased Build Alternative appears to be preliminarily feasible considering legal and regulatory factors, because it is currently uncertain whether the Morongo Band may or will exercise that right, and particularly because on Morongo lands the alternative is entirely consistent with the Project (as defined in Exhibit A to the Development and Coordination Agreement [DCA]). Although the alternative is designed to meet the same project objectives as the Project described in the ROW Agreement and DCA and the tower structures would be exactly the same as SCE's Proposed Project on Reservation lands, comments from the Morongo Band assert that this alternative may be legally infeasible given the right of the Morongo Band to terminate the ROW Agreement if the SCE does not secure approvals by January 1, 2017 for the project described in the DCA (which arguably differs from the Phased Build Alternative in the tower locations off the Morongo Band lands, but is wholly consistent on Morongo Band lands). That termination right, however, has not been exercised and thus no such legal infeasibility currently exists. If that right is properly and timely exercised by the Morongo Band in the future, no transmission upgrades could be constructed across the Reservation absent the subsequent execution of a replacement ROW Agreement.

The Phased Build Alternative would use a composite reinforced conductor in an appropriate size to allow import from all generation projects that are reasonably foreseeable (i.e., included in the CAISO's 2024 Reliability Base Case, as well as allowing import of an additional 1,400 MW from the Imperial Valley). A high-performance conductor weighs less and has lower thermal expansion than the SCE-standard ACSR conductor, resulting in less sag for an equivalent strength and durability as the ACSR conductor. Therefore, using an alternative conductor would satisfy the basic project objectives while simultaneously avoiding the need to rebuild all existing double-circuit towers in the corridor.

Two options for the Phased Build Alternative in Segment 5 are presented in this Addendum:

- **Phased Build Alternative Option 1** in which all Segment 5 towers (not just the approximately 60 percent on Morongo land) would be removed and replaced with the Proposed Project tubular steel pole and double-circuit lattice steel tower structures). This option would ensure that no future tower

construction would occur in Segment 5; but there would be future construction activity related to reconductoring from Drake 795 to 1590 kcmil conductors.

- **Phased Build Alternative Option 2** would have the Proposed Project's structures and 1590 kcmil conductor installed in all of Segment 5, eliminating all possible future effects on Morongo lands.

Rationale for Full Analysis. The Phased Build Alternative is retained for analysis because it would reduce the environmental impacts of the Proposed Project by ~~greatly~~ reducing the amount of construction disturbance in comparison with the Proposed Project by 20 percent to 25 percent. While it would require construction of up to 110 interset structures, ~~†~~ this alternative would retain nearly all existing 220 kV double-circuit structures where feasible, thereby reducing the amount of tower deconstruction needed and reducing the number of new towers and poles that would be constructed. ~~It also would not require the relocation of the 66 kV subtransmission lines.~~ It would achieve all three Basic Project Objectives. In addition, this alternative is technically feasible, based on data provided by SCE to the EIR team through formal data requests. The alternative conductor type has been proven and is in use by other utilities.

ES.6 Summary Comparison of the Proposed Project and Alternatives

This section summarizes and compares the environmental advantages and disadvantages of the Proposed Project and the alternatives evaluated in the Final EIR. This comparison is based on the assessment of environmental impacts of the Proposed Project and each alternative, as identified in Final EIR Sections D, E, and F. The methodology used for comparing alternatives is described in Section ES.6.1. Under CEQA, an "environmentally superior alternative" is designated. Section ES.6.3 presents a comparison of the No Project Alternative with the alternative that is determined in Section ES.6.2 to be environmentally superior.

CEQA Guidelines require that an EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. The Guidelines also state that if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. If the environmentally superior alternative is the No Project Alternative, CEQA requires identification of an environmentally superior alternative among the other alternatives [CEQA Guidelines Section 15126.6(e)(2)].

ES.6.2 Environmentally Superior Alternative

The characteristics of the three retained alternatives are summarized in Table ES-1. The alternatives would be in the same ROW as the Proposed Project.

The **Tower Relocation Alternative** is preferred over the Proposed Project because it would result in a less severe visual impact in Segments 4, 5, and 6 by relocating various tower pairs approximately 50 feet north of the project's proposed tower locations. By shifting structures farther away from the closest residences, the Tower Relocation Alternative would result in structure placements within the ROW that would appear more similar to the existing structure locations. As a result, when viewed from residential locations along the south side of the ROW the Tower Relocation Alternative would cause less incremental visual contrast, structure prominence, and view blockage compared to the Proposed Project. The Tower Relocation Alternative would also reduce construction-related disturbance associated with the upgraded 220 kV lines by ensuring that relocated towers would be no closer to residences than the existing structures.

The **Iowa Street 66 kV Underground Alternative** is preferred over the Proposed Project's 66 kV overhead segment. Although an underground segment would have greater ground disturbance and traffic impacts

and a longer construction time, it would eliminate the long-term significant and unmitigable visual impacts associated with a new overhead 66 kV subtransmission line along Iowa Street, adjacent to the Cottage Lane residential subdivision in Redlands.

Table ES-1. Summary of Alternatives Analyzed

| Alternative Name | Description | Notes about Combining with Other Alternatives |
|--|---|---|
| Tower Relocation Alternative | <ul style="list-style-type: none"> • Locates certain of SCE's proposed transmission structures further from residences in Segments 4, 5, and 6 | <ul style="list-style-type: none"> • This alternative applies to <u>specific locations in Segments 4, 5, and 6</u> and would be implemented in combination with the Proposed Project in <u>the other areas of those segments, and in all of Segments 1, 2, and 3, and 5.</u> • These alternative tower locations are incorporated into the Phased Build Alternative as well |
| Iowa Street 66 kV Underground Alternative | <ul style="list-style-type: none"> • Installs 1,600 feet of proposed overhead 66 kV subtransmission line underground within Iowa Street | <ul style="list-style-type: none"> • This alternative could be combined with either the Proposed Project or with the Tower Relocation Alternative • This alternative would <u>may not be combined required</u> with the Phased Build Alternative; because <u>the 66 kV subtransmission system would may or may not be able to be retained in the Phased Build Alternative without not being</u> relocated |
| Phased Build Alternative | <ul style="list-style-type: none"> • Retains existing double-circuit 220 kV transmission structures • Removes the two lines of existing single-circuit 220 kV structures and replaces them with one line of new double-circuit structures • All 220 kV conductors would be Drake 795 ACCR • On Morongo land, 220 kV structures would be relocated and rebuilt as TSPs as defined in SCE-Morongos ROW Agreement • Allows for future phased increases in corridor transmission capacity, as required | <ul style="list-style-type: none"> • This alternative incorporates the structure relocations defined in the Tower Relocation Alternative • This alternative <u>may</u> eliminate the need for the Iowa Street 66 kV Underground Alternative; because <u>SCE's 66 kV system may be able to be retained and may or may not need to be</u> modified as it would in the Proposed Project |

The **Phased Build Alternative** is preferred over the Proposed Project because it would reduce construction impacts by eliminating the need to remove and reconstruct most of the existing double-circuit 220 kV structures and relocate the existing 66 kV subtransmission lines. It would also reduce operational impacts, by reducing the visual impacts of the Proposed Project due to the location of new structures closer to the center of the ROW, and the implementation of the Tower Relocation Alternative as part of this alternative. ~~The Phased Build Alternative would not require implementation of the Iowa Street 66 kV Underground Alternative, since the existing 66 kV system would not be affected.~~

CPUC Conclusion Regarding Environmentally Superior Alternative

The CPUC has identified the Environmentally Superior Alternative, as required by CEQA Guidelines Section 15126.6(d) and (e)(2). The Environmentally Superior Alternative would be the Phased Build Alternative (which incorporates the structure locations defined in the Tower Relocation Alternative). The Environmentally Superior Alternative is illustrated in Final EIR Figure Ap.5-5a (which has been revised from

the Final EIR and appears at the end of this Addendum) ES-5. If the 66 kV relocation is found to be required with the Phased Build Alternative, the Iowa Street Underground Alternative would also be required included with the Environmentally Superior is alternative.

The second preferred alternative would be the combination of the Tower Relocation Alternative, the Iowa Street 66 kV Underground Alternative, and the Proposed Project for the segments otherwise unaffected by those two alternatives. The least environmentally preferred would be the Proposed Project with no modifications.

Section A, Introduction

This Addendum adds one sentence to Section A.2.3, as shown below.

A.2.3 CPUC and BLM Project Objectives

Project objectives under CEQA are defined in order to allow proper consideration of alternatives to the Proposed Project. The State CEQA Guidelines (Section 15126.6(a)) state that “An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

Having taken into consideration the objectives and purpose and need set forth by SCE (Sections A.2.1.1 and A.2.1.2), the CPUC and BLM identified 3 basic project objectives. These objectives are used by the CPUC and BLM to evaluate alternatives and to define a range of reasonable alternatives to the Proposed Project. The evaluation of alternatives in this EIR/EIS provides information on whether each alternative could feasibly accomplish most or all of these basic objectives. The 3 basic project objectives are presented and explained below.

Basic Project Objective 1: To upgrade the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino Substations to increase system deliverability by at least 2,200 MW.

The first Basic Project Objective reflects the aim to provide increased deliverability of electricity, defined in terms of MW, for existing and planned generating facilities that are located far from the utility load centers in the Los Angeles basin. Before the Proposed Project was planned, the transmission transfer capability of the WOD 220 kV corridor was limited to approximately 550 MW. Since then, several generators with plans to be online before the Proposed Project’s estimated completion date in 2020 requested interconnection to the system. In order to accommodate and deliver the initial group of 5 solar power generation projects that was planned, totaling 2,200 MW (CAISO, 2010), the minimum total capability that would need to be achieved by the Proposed Project or an alternative is 2,750 MW. Accordingly, the first Basic Project Objective is to increase deliverability by at least 2,200 MW. The initial 5 projects are described in Section A.2.1.4.1 above, Table A-3, and in 2010 they were the following:

- NextEra Desert Center Blythe, LLC (Genesis McCoy): 500 MW
- NextEra Blythe Solar Energy Center, LLC: 1,000 MW
- Palen SEGS II, LLC (Palen) subsidiary of BrightSource Energy: 500 MW
- Project interconnecting at Blythe–Eagle Mountain 161 kV line: 50 MW
- Project interconnecting at Colorado River 220 kV: 150 MW

The EIR/EIS team completed independent power flow modeling to evaluate the capacity of the current transmission system, the Proposed Project, and several sensitivities. The report of these studies is presented as Attachment 2 to EIR/EIS Appendix 5 (Alternatives Screening Report). The CAISO’s 2024 Reliability Base Case, from the CAISO’s 2013/2014 transmission planning process (one of the base cases used in the alternative analysis) represents the view from the CAISO’s and SCE’s perspective (a collaborative effort) of the level of generation deemed viable (based on a number of criteria) and to be in place and operational in 2024. In developing the 2024 Reliability Base Case, the CAISO included only that generation that was under construction or had received regulatory approval at the time.

Section D, Environmental Analysis: Mitigation Measures and Text Changes

In its Opening Brief submitted to the CPUC in January of 2016, SCE requested modifications to 12 mitigation measures and to text in Section D.19. Based on review of each proposed change, no changes have been made to the six measures listed below. The rationale for not accepting these changes is presented in the Supporting Documentation at the end of this Addendum, in the table entitled “Responses to SCE Opening Brief, Appendix A.”

- Biological Resources (Vegetation): MM VEG-1d, VEG-3a, VEG-4a
- Visual Resources: MM VR-4a, VR-8a, VR-9a

Changes clarifying mitigation text have been made to the following 6 measures in response to information in SCE’s Opening Brief. These changes are shown in the following pages, with ~~strikeout~~ and underline.

- Biological Resources (Vegetation): MM VEG-1e
- Biological Resources (Wildlife): MM WIL-1c and WIL-2e
- Noise: MM N-1a and N-1b
- Water Resources: MM WR-2a

In addition, this section includes changes to the Visual Resources analysis (Section D.18) to address the interspersed structures.

Section D.4, Biological Resources – Vegetation

VEG-1e **Compensate for permanent habitat loss.** SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management or through participation in an approved in-lieu fee compensatory mitigation bank. This compensation may be accomplished through participation in the WR-MSHCP, CV-MSHCP (within the respective MSHCP areas) if SCE obtains PSE status. This mitigation measure will be applicable to all permanent project disturbance areas and to areas designated as temporary disturbance, but that cannot be effectively revegetated or restored to replace habitat values within a five-year timeframe.

Habitat compensation for all permanent or long-term habitat loss that is not compensated through participation in the WR-MSHCP or CV-MSHCP will be accomplished by acquisition of mitigation land or conservation easements or by providing funding for specific land acquisition, endowment, restoration, and management actions. SCE will prepare a Habitat Compensation Plan to be reviewed and approved by the CPUC, BLM, in consultation with the USFWS and CDFW.

SCE will acquire and protect, in perpetuity, compensation habitat to mitigate impacts to biological resources as detailed below. SCE shall be responsible for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands. The compensation lands will be placed under conservation management to be funded through the terms described herein. If there is any conflict between the requirements of this mitigation measure and requirements of any resource agency permit (e.g., USFWS Biological Opinion or CDFW Incidental Take Permit), the more stringent requirement shall apply.

The acreages of compensation land will be based upon final engineering calculation of impacted acreage for each resource and on ratios set forth in this measure, or in the USFWS Biological Opinion, the CDFW Streambed Alteration Agreement, the CDFW Incidental Take Permit, or the Consistency Determination, whichever presents a higher ratio. Acreages will be adjusted as appropriate for other alternatives or future modifications during implementation.

Compensation will be provided for impacts to the following resources, at the ratios specified below (acres acquired and preserved to acres impacted). These ratios reflect multiple biological resource values, including habitat suitability for special-status species.

- Previously disturbed lands (agriculture, developed/disturbed) and open water: n/a (no habitat compensation required)
- Chaparral, desert scrub, and grassland/forbland: 1:1
- Alluvial scrub, coast live oak woodland, riparian woodland, and aeolian sand: 3:1
- Coastal sage scrub within USFWS designated coastal California gnatcatcher critical habitat and coastal sage scrub outside of designated critical habitat that is occupied by California gnatcatcher: 3:1
- Coastal sage scrub outside of USFWS designated coastal California gnatcatcher critical habitat that is suitable habitat, but not occupied by California gnatcatcher: 1:1

The Habitat Compensation Plan will specify compensation acreage for each habitat type, based on final engineering and on MSHCP coverage as applicable. Final compensation requirements may be adjusted to account for any deviations in project disturbance, according to the as-built shapefiles aerial imagery (Mitigation Measure VEG-1c).

Compensation Land Selection Criteria. Criteria for the acquisition, initial protection and habitat improvement, and long-term maintenance and management of compensation lands for impacts to biological resources will include all of the following:

- Compensation lands will provide habitat value that is equal to or better than the quality and function of the habitat impacted by the project, taking into consideration soils, vegetation, topography, human-related disturbance, wildlife movement opportunity, proximity to other protected lands, management feasibility, and other habitat values, subject to review and approval by CPUC and BLM;
- To the extent that proposed compensation habitat may have been degraded by previous uses or activities, the site quality and nature of degradation must support the expectation that it will regenerate naturally when disturbances are removed;
- Be near larger blocks of lands that are either already protected or planned for protection, or which could feasibly be protected long-term by a public resource agency or a non-governmental organization dedicated to habitat preservation;
- Not have a history of intensive recreational use or other disturbance that might cause future erosion or other habitat damage, and make habitat recovery and restoration infeasible;
- Not be characterized by high densities of invasive species, either on or immediately adjacent to the parcels under consideration, that might jeopardize habitat recovery and restoration;

- Not contain hazardous wastes that cannot be removed to the extent that the site could not provide suitable habitat;
- Must provide wildlife movement value equal to that on the project site, based on topography, presence and nature of movement barriers or crossing points, location in relationship to other habitat areas, management feasibility, and other habitat values; and
- Have water and mineral rights included as part of the acquisition, unless the CPUC and BLM, in consultation with CDFW and USFWS, agree in writing to the acceptability of land without these rights.

Review and Approval of Compensation Lands Prior to Acquisition. SCE shall submit a Draft Habitat Compensation Plan for review and approval by the CPUC and BLM describing the parcel(s) intended for protection. This Plan will discuss the suitability of the proposed parcel(s) as compensation lands in relation to the selection criteria listed above.

Management Plan. SCE or approved third party will prepare a management plan for the compensation lands in consultation with the entity that will be managing the lands. The goal of the management plan will be to support and enhance the long-term viability of the biological resources. The Management Plan will be submitted for review and approval to the CPUC and BLM, in consultation with CDFW and USFWS.

Compensation Lands Acquisition Requirements. SCE will comply with the following requirements relating to acquisition of the compensation lands after the CPUC and BLM have approved the proposed compensation lands:

- **Preliminary Report.** SCE or an approved third party will provide a recent preliminary title report, initial hazardous materials survey report, biological resources analysis, and other necessary or requested documents for the proposed compensation land to the CPUC and BLM. All documents conveying or conserving compensation lands and all conditions of title are subject to review and approval by the CPUC in consultation with CDFW and USFWS. For conveyances to the State, approval may also be required from the California Department of General Services, the Fish and Game Commission, and the Wildlife Conservation Board.
- **Title/Conveyance.** SCE will acquire and transfer fee title to the compensation lands, a conservation easement over the lands, or both fee title and conservation easement, as required by the CPUC and BLM, in consultation with USFWS and CDFW. Any transfer of a conservation easement or fee title must be to CDFW, to a non-profit organization qualified to hold title to and manage compensation lands (pursuant to California Government Code section 65965), or to BLM or other public agency approved by the CPUC and BLM. If an approved non-profit organization holds fee title to the compensation lands, a conservation easement will be recorded in favor of CDFW or another entity approved by the CPUC and BLM. If an entity other than CDFW holds a conservation easement over the compensation lands, the CPUC and BLM may require that CDFW or another entity approved by the CPUC and BLM, in consultation with CDFW and USFWS, be named a third party beneficiary of the conservation easement. SCE will obtain approval of the CPUC and BLM of the terms of any transfer of fee title or conservation easement to the compensation lands.

- **Initial Protection and Habitat Improvement.** SCE will fund activities that the CPUC and BLM may require for the initial protection and habitat improvement of the compensation lands. These activities will vary depending on the condition and location of the land acquired, but may include trash removal, construction and repair of fences, invasive plant removal, and similar measures to protect habitat and improve habitat quality on the compensation lands. A non-profit organization, CDFW, or another public agency may hold and expend the habitat improvement funds if it is qualified to manage the compensation lands (pursuant to California Government Code section 65965), if it meets the approval of the CPUC and BLM, in consultation with USFWS and CDFW, and if it is authorized to participate in implementing the required activities on the compensation lands. If CDFW takes fee title to the compensation lands, the habitat improvement fund must be paid to CDFW or its designee.
- **Property Analysis Record.** Upon identification of the compensation lands, SCE will conduct a Property Analysis Record (PAR) or PAR-like analysis to establish the appropriate amount of the long-term maintenance and management fund to pay the in-perpetuity management of the compensation lands. The PAR or PAR-like analysis must be approved by the CPUC and BLM, in consultation with USFWS and CDFW, before it can be used to establish funding levels or management activities for the compensation lands.
- **Long-term Maintenance and Management Funding.** SCE will provide funding to establish an account with non-wasting capital that will be used to fund the long-term maintenance and management of the compensation lands. The amount of money will be determined through an approved PAR or PAR-like analysis conducted for the compensation lands. SCE must obtain the BLM and Riverside County's approval of the entity that will receive and hold the long-term maintenance and management fund for the compensation lands. The CPUC and BLM will consult with USFWS and CDFW before deciding whether to approve an entity to hold the project's long-term maintenance and management funds.

SCE will ensure that an agreement is in place with the long-term maintenance and management fund holder/manager to ensure the following requirements are met:

- **Interest.** Interest generated from the initial capital long-term maintenance and management fund will be available for reinvestment into the principal and for the long-term operation, management, and protection of the approved compensation lands, including reasonable administrative overhead, biological monitoring, habitat improvements, patrol and law enforcement activities, and any other action that is approved by the CPUC and BLM and is designed to protect or improve the habitat values of the compensation lands.
- **Withdrawal of Principal.** The long-term maintenance and management fund principal will not be drawn upon unless such withdrawal is deemed necessary by the CPUC and BLM, or by the approved third-party long-term maintenance and management fund manager, to ensure the continued viability of the species on the compensation lands.
- **Pooling Long-Term Maintenance and Management Funds.** An entity approved to hold long-term maintenance and management funds for the project may pool those funds with similar non-wasting funds that it holds from other projects for long-term

maintenance and management of compensation lands. However, for reporting purposes, the long-term maintenance and management funds for this project must be tracked and reported individually to the CPUC and BLM.

- **Other Expenses.** In addition to the costs listed above, SCE will be responsible for all other costs related to acquisition of compensation lands and conservation easements, including but not limited to the title and document review costs incurred from other state agency reviews, overhead related to providing compensation lands to CDFW or an approved third party, escrow fees or costs, environmental contaminants clearance, and other site cleanup measures.
- **Delegation.** The responsibility for acquisition of compensation lands may be delegated to a third party, by written agreement of the CPUC and BLM, in consultation with CDFW, prior to land acquisition, enhancement or management activities.

Implementation Locations: This mitigation measure applies to all locations within San Bernardino County and on all BLM lands, and is recommended for implementation on all tribal lands. Within the WR-MSHCP and CV-MSHCP areas, if SCE does not obtain PSE status under the applicable MSHCP, this mitigation measure shall apply within the MSHCP area. If SCE obtains PSE status under either MSHCP, the project's permanent habitat impacts will be compensated according to the requirements of the MSHCP and this mitigation measure will not apply within the applicable MSHCP area.

Section D.5, Biological Resources – Wildlife

WIL-1c

Prepare and implement a Nesting Bird Management Plan. [Supersedes APM BIO-3] SCE shall prepare a Nesting Bird Management Plan (NBMP) in coordination with CPUC, BLM, CDFW, and USFWS. The NBMP shall describe methods to minimize potential project effects to nesting birds, and avoid any potential for unauthorized take. Project-related disturbance including construction and pre-construction activities shall not proceed within 300 feet of active nests of common bird species or 500 feet of active nests of raptors or special-status bird species (except for golden eagle as described in Mitigation Measure WIL-2f) until approval of the NBMP by CPUC and BLM in consultation with CDFW and USFWS.

NBMP Content. The NBMP shall include: (1) definitions of default nest avoidance buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become necessary; (4) a rigorous monitoring protocol, including qualifications of monitors, monitoring schedule, and field methods, to ensure that any project-related effects to nesting birds will be minimized; and (5) a protocol for documenting and reporting any inadvertent contact or effects to birds or nests.

The paragraphs below describe the NBMP requirements in further detail.

Background. The NBMP shall include the following:

- A summary of applicable state and federal laws and regulations, including definition of what constitutes a nest or active nest under state and federal law.
- A procedure for amendment of the NBMP, should there be changes in applicable state or federal regulations or as necessary for adaptive management upon approval by CDFW, USFWS, CPUC, and BLM.

- A list of bird species potentially nesting on or near the ROW or other work areas, indicating approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, vegetation, structures, etc.), tolerance to disturbance (if known) and any conservation status for each species. This section will also note any species that do not require avoidance measures (e.g., rock pigeons).
- A list of the types of project activities (construction, operations, and maintenance) that may occur during nesting season, with a short description of the noise and physical disturbance resulting from each activity.
- Clearing of any vegetation, site preparation in open or barren areas, or other project-related activities that may adversely affect breeding birds shall be scheduled outside the nesting season, as feasible.

Pre-construction nest surveys. Pre-construction nest surveys will be conducted prior to any construction activities scheduled during the breeding period. For this project, the breeding period will be defined as January 1 through August 31. The NBMP shall describe the proposed field methods, survey timing, and qualifications of field biologists. Field biologist qualifications will be subject to review by CPUC and BLM. The avian biologists conducting the surveys shall be experienced bird surveyors and familiar with standard nest-locating techniques such as those described in Martin and Guepel (1993). Nest surveys will focus on visual searches for nest locations and observations of bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). Surveys shall be conducted in accordance with the following guidelines.

- Surveys shall cover all potential nesting habitat within the ROW or other work areas and within 500 feet of these areas for raptors and 300 feet for non-raptors.
- Pre-construction surveys shall be conducted for each work area, no longer than 10 days prior to the start of construction activity. On the first day of construction at any given site, a qualified Avian Biologist will perform a pre-construction “sweep” to identify any bird nests or other resources that may have appeared since the 10-day survey.
- SCE shall provide the CPUC and BLM a report describing the findings of the pre-construction nest surveys, including the time, date, and duration of the survey; identity of the surveyor(s); a list of species observed; and electronic data identifying nest locations and the boundaries of buffer zones. The electronic data set will be updated following each pre-construction nest survey throughout the nesting season. The format and contents of this report will be described in the draft NBMP and will be subject to review and approval by CPUC and BLM.

Nest Buffers and Acceptable Activities

The NBMP shall specify measures to delineate buffers on the work site, to consist of clearly visible marking and signage. Buffer locations shall be communicated to the construction contractor, and shall remain in effect until formally discontinued (when each nest is no longer active). In addition, the NBMP shall specify measures to ensure the buffers are observed, including a direct communication and decision protocol to stop work within buffer areas. In some cases, active nests may be found while work is underway. Therefore, the NBMP shall include a protocol for stopping ongoing work within

the buffer area, securing the work site, and removing personnel and equipment from the buffer.

The NBMP shall describe proposed measures to avoid take or adverse effects to nests, such as buffer distances from active nests. These measures shall be based on the specific nature of the bird species and conservation status, and other pertinent factors.

The NBMP will identify bird species (or groups of species) that are relatively tolerant or intolerant of human activities and specify smaller or larger buffer distances as appropriate for each species. If no information is available to specify a buffer distance for a species, then the NBMP shall specify 300 feet as a standard buffer distance, and 500 feet for raptors and special-status species. Nest management for listed threatened or endangered species will be prescribed in a USFWS Biological Opinion, CDFW Incidental Take Permit, or both. All applicable avoidance measures, including buffer distances, must be continued until nest monitoring (below) confirms that the nestlings have fledged and dispersed, or the nest is no longer active.

For each special-status species potentially nesting within or near project work areas, the NBMP shall specify applicable buffers and any additional nest protection measures, specialty monitoring, or restrictions on work activities, if needed.

The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspection or BMP repair) including conditions and restrictions, and any monitoring required. The NBMP shall include pictorial representation showing buffer distances for ground buffers, vertical helicopter buffers, and horizontal helicopter buffers for nests near the ground and nests in towers.

Nest Buffer Modification or Reduction

At times, SCE or its contractor may propose buffer distances different from those approved in the NBMP. Buffer adjustments shall be reviewed and recommended by a qualified avian biologist who has been approved by CPUC and BLM in consultation with the CDFW and USFWS. The NBMP shall provide a procedure and timing requirements for notifying CPUC, BLM, CDFW, and USFWS of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status birds. The NBMP will list the information to be included in buffer reduction notifications in a standardized format.

Nest deterrents. The NBMP shall describe any proposed measures or deterrents to prevent or reduce bird nesting activity on project equipment or facilities, such as buoys, visual or auditory hazing devices, bird repellents, securing of materials, and netting of materials, vehicles, and equipment. It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance for the contractor to install, maintain, and remove nest deterrents according to product specifications; and periodic monitoring of nest deterrents to ensure proper installation and functioning and prevent injury or entrapment of birds or other animals. In the event that an active nest is located on project facilities, materials or equipment, SCE will avoid disturbance or use of the facilities, materials or equipment (e.g., by red-tag) until the nest is no longer active.

Communication. The NBMP shall specify the responsibilities of construction monitors in regards to nests and nest issues, and specify a direct communication protocol to ensure

that nest information and potential adverse impacts to nesting birds can be promptly communicated from nest monitors to construction monitors, so that any needed actions can be taken immediately.

The NBMP shall specify a procedure to be implemented following accidental disturbance of nests, including wildlife rehabilitation options. It also shall describe any proposed measures, and applicable circumstances, to prevent take of precocial young of ground-nesting birds such as killdeer or quail. For example, chick fences may be used to prevent them from entering work areas and access roads. Finally, the NBMP will specify a procedure for removal of inactive nests, including verification that the nest is inactive and a notification/approval process.

Monitoring. SCE shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures (above). The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to project work areas, bird nesting activity, project-related disturbance, and outcome of each nest. For nests with reduced buffers, SCE shall monitor each nest until nestlings have fledged and dispersed or until the nest becomes inactive. Nests with default buffers do not require further monitoring once construction work is completed in the area. New nests discovered after work completion in an area would not require monitoring. In addition, monitoring shall include pre-construction surveys, daily sweeps of work areas and equipment, and any special monitoring requirements for particular activities (tree trimming, vegetation removal, etc.) or particular species (noise monitoring, etc.). Nest monitoring shall continue throughout the breeding season during each year of the project's construction activities.

Reporting. Throughout the construction phase of the project, nest locations, project activities in the vicinity of nests (including helicopter traces), and any adjustments to buffer areas shall be updated and available to CPUC monitors on a daily basis. All buffer reduction notifications and prompt notifications of nest-related non-compliance and corrective actions will be made via email to CPUC monitors. The draft NBMP shall include a proposed format for daily and weekly reporting (e.g., spreadsheet available online, tracking each nest). In addition, the NBMP shall specify the format and content of nest data to be provided in regular monitoring and compliance reports. At the end of each year's nest season, SCE will submit an annual NBMP report to the CPUC, BLM, CDFW, and USFWS. Specific contents and format of the annual report will be reviewed and approved by the CPUC and BLM in consultation with CDFW and USFWS.

Implementation locations: San Bernardino County (all); WR-MSHCP (all, regardless of SCE's PSE status); CV-MSHCP (all, regardless of SCE's PSE status); BLM (all); reservation (recommended for all Morongo Tribal Lands).

WIL-2e

Conduct surveys and avoidance for coastal California gnatcatcher. SCE shall conduct protocol level surveys for coastal California gnatcatchers (CAGN) in all areas of coastal sage scrub habitat that may be affected by the project. Survey areas will include a 500-foot buffer around project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied CAGN habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.

Surveys shall be conducted by qualified and permitted biologists. Surveys shall be of adequate duration to verify potential nest sites if work is scheduled to occur during the breeding season. Prior to construction, SCE shall submit documentation providing the results of the pre-construction focused surveys for CAGN to the CPUC and BLM for review and approval in consultation with USFWS and CDFW.

Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities.

If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately and the observation will be included in the daily monitoring report. All active nests shall be monitored on a weekly basis until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review on a weekly basis.

In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000-foot vertical helicopter disturbance-free buffer shall be established around the active nest and demarcated by fencing or flagging. These buffers may be adjusted in consultation with USFWS and CDFW based on type of work activity performed. No construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads.

If an active breeding territory or nest is confirmed within 500 feet of any project activity site, the authorized nesting bird monitor shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting, in the opinion of the authorized nesting bird monitor, construction within 500 feet will immediately discontinue. If the authorized nesting bird monitor determines that construction may continue, SCE shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while CAGN occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.

If the hourly average noise threshold is exceeded, or if the biological monitor determines that construction activities are disturbing nesting CAGN, additional noise reduction techniques shall be implemented to reduce project noise below the thresholds. Additional noise monitoring will be conducted to verify the reduction of noise levels below the thresholds. Noise reduction techniques can include, but are not limited to:

- Temporary noise barriers or sound walls
- Noise pads or dampers
- Replace and update noisy equipment
- Moveable task noise barriers
- Queue trucks to distribute idling noise
- Locate vehicle access points and loading and shipping facilities away from the nest site
- Reduce the number of noisy activities that occur simultaneously
- Relocate noisy stationary equipment away from the nest sites

Construction activities shall avoid suitable habitat for CAGN, to the extent feasible. If suitable habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain

appropriate take authorization, ~~or permits,~~ and/or Participating Special Entity (PSE) status. SCE shall implement the conservation measures contained within these permits.

Implementation locations: This mitigation measure shall apply within San Bernardino County, throughout the WR-MSHCP lands (regardless of SCE's PSE status), and is recommended within Morongo Tribal Lands. No suitable CAGN habitat is present in the CV-MSHCP portions of the ROW or on BLM land, so this mitigation measure shall not apply within those areas.

Section D.13, Noise

N-1a **Implement best management practices for construction noise.** SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise-sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:

- Construction noise shall be confined to daytime, weekday hours (7:00 a.m. to 6:00 p.m.) or an alternative schedule developed by SCE based on its coordination with the local jurisdiction.
- Construction equipment shall use noise reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer.
- Stationary noise sources (e.g., generators, pumps) ~~and at staging areas and on the ROW within 1,400 feet of sensitive receptors~~ shall be shielded from adjacent noise-sensitive receptors at the source by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cutouts.
- Construction traffic and helicopter flight shall be routed away from residences and schools, where feasible.
- Unnecessary construction vehicle use and idling time shall be minimized to the extent feasible, such that if a vehicle is not required for use immediately or continuously for safe construction activities, its engine should be shut off.

N-1b **Implement a helicopter noise control strategy.** As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise-sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (greater than 15 minutes) within 250 feet of residences in any vertical or horizontal direction.

Section D.18, Visual Resources

Textual changes have been made to the discussion of the impacts of the Phased Build Alternative and its long-term presence (Impact VR-8) in Section D.18.4.3.

D.18.4.3 Phased Build Alternative

Impact VR-8: Long-term presence of the project would result in landscape changes that degrade existing visual character or quality (Class I, III, or IV depending on location)

As with the Proposed Project, impacts of this alternative in other areas would range from beneficial (Class IV) to Class I (significant and unmitigable), depending on the location of existing towers and the distance of the new towers from residences. Under the Proposed Project, the long-term presence of the project would result in significant (Class I) visual impacts in Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane, and in Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the Community of Whitewater. Under the Phased Build Alternative, these Class I visual impacts of the Proposed Project would be reduced to less than significant (Class III) levels by retaining the existing double-circuit structures that are near the center of the ROW, and locating the new double-circuit towers farther to the north, away from the residences. The Phased Build Alternative would also include up to 110 additional interset structures along the retained double-circuit line over the 45-mile corridor length. This would add visual complexity to the ROW in some areas, but the greater distance of the towers to the edge of the ROW remains a substantial visual benefit in the areas where visual impacts of the Proposed Project would be most severe. In addition, if the 66 kV relocation is required in Segment 1, as it is for the Proposed Project, the Iowa Street Underground Alternative would be required in order to eliminate the significant visual impacts of the proposed new overhead line along Iowa Street.

However, The significant (Class I) visual impact in Segment 5 on Morongo Tribal Lands (when viewed from North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning) would remain significant as the Morongo Band of Mission Indians opted not to consider tower relocation.

Section D.19, Water Resources and Hydrology

WR-2a **Implement an Erosion Control Plan and demonstrate compliance with water quality permits.** SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction. The Erosion Control Plan may be part of the Stormwater Pollution Prevention Plan, and kept onsite and readily available on request.

Soil disturbance at structures and access roads is to be minimized and designed to prevent long-term erosion. The Erosion Control Plan shall include:

- The location of all soil-disturbing activities, including but not limited to new and/or improved access and spur roads.
- The location of all streams and drainage structures that would be directly affected by soil-disturbing activities (such as stream crossings or public storm drains by the right-of-way and access roads).
- BMPs to protect drainage structures, such as public storm drains, downstream of soil disturbance activities.

- Design features to be implemented to minimize erosion during construction and during operation (if the project feature is to remain permanent after construction).
- If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the ~~Regional Water Quality Control Board~~ appropriate jurisdiction shall be submitted to the CPUC and BLM prior to its use.
- If design features include the use of retaining structures and/or walls, the design of the features shall be consistent with Mitigation Measure VR-3a (Reduce color contrast of retaining walls and land scars).
- The location and type of BMPs that would be installed to prevent off-site sedimentation and to protect aquatic resources.
- Specifications for the implementation and maintenance of erosion control measures and a description of the erosion control practices, including appropriate design and installation details.
- Proposed schedule for inspection of erosion control/SWPPP measures and schedule for corrective actions/repairs, if required. Erosion control/SWPPP inspection reports shall be provided to the CPUC EM.

Locations requiring erosion control/SWPPP corrective actions/repairs shall be tracked, including dates of completion, and documented during inspections. Inspections and monitoring shall be performed in compliance with the Federal and California Construction General Permits. The inspection reports shall be maintained and kept in their respective SWPPP, kept on site as required by the Federal and State Construction General Permits, and made available to the RWQCB, CPUC, BLM, counties, local municipalities, and tribal governments, on request. Additionally, an Annual Report shall be filed for each reporting period in compliance with Federal and California Construction General Permit reporting requirements.

SCE shall submit to the CPUC and BLM Grading Plans that define the locations of the specific features listed above.

SCE shall submit to the CPUC and BLM evidence of possession of applicable required permits for the representative land disturbance prior to engaging in soil-disturbing construction/demolition activities. Such permits may include, but are not limited to, a CWA Section 402 NPDES California General Permit for Storm Water Discharges Associated with Construction Activities (General Permit) from the applicable Regional Water Quality Control Board(s) (RWQCBs), and the Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land.

Prior to ground disturbance in stream channels or other waters jurisdictional to the State of California or the Federal Government, SCE shall obtain a Streambed Alteration Agreement from the California Department of Fish and Wildlife, a Section 404 permit from the USACE, and a CWA Section 401 certification from the SWRCB.

Text Revisions to the Final EIR, Section D.19.2.1

D.19.2.1 Federal

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The SCE West of Devers Upgrade Project would disturb more than 1 acre of ground, placing the project under the NPDES and the California General Permit for Discharges of Storm Water Associated with Construction Activity (General Construction Permit). The NPDES Construction General Permit, administered by the Federal Environmental Protection Agency on Tribal Lands (Federal General Permit for Storm Water Discharges Associated with Construction Activities on Tribal Land), and by the California State Water Resources Control Board elsewhere on the West of Devers Project, requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing Best Management Practices (BMPs) the discharger would use to protect stormwater runoff. The SWPPP must contain a visual monitoring program; a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a waterbody listed on the 303(d) list for sediment.

The General Permit requires that the SWPPP include a description of post-construction BMPs, and a maintenance schedule. An effective stormwater management strategy must address the full suite of storm events including water quality, channel protection, overbank flood protection, and extreme flood protection. Overbank flood protection and extreme flood protection events are traditionally dealt with in local drainage and flood protection ordinances. However, measures in the General Permit to address water quality and channel protection also reduce overbank and extreme flooding impacts.

Section 401 of the CWA requires that any activity, including river or stream crossings during road, pipeline, or transmission line construction, which may result in a discharge into waters of the U.S. be certified by the RWQCB. This certification ensures that the proposed activity does not violate State and/or federal water quality standards. The SCE West of Devers Upgrade Project is expected to result in discharges to waters of the U.S., and would require Section 401 certification.

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Section G. Comparison of Phased Build Alternative with Proposed Project

G.4.3 Phased Build Alternative

As defined in Final EIR Section C.4.3, the Phased Build Alternative would retain most of the existing 220 kV double-circuit structures, require demolition of the existing single-circuit structures and construction of one new set of double-circuit, and install high-capacity conductors (Drake ACCR) on all 4 circuits. For the new double-circuit towers in Segments 4, 5, and 6, the Phased Build Alternative incorporates the structure locations proposed in the Tower Relocation Alternative. Based on final design and uncertainty of SCE obtaining simultaneous outages, R relocation of the 66 kV subtransmission and 12 kV distribution lines would may or may not be required, because t. The Phased Build Alternative would utilize the existing 220 kV structures in Segment 1, and the existing 66 kV poles would be unaffected, but may be too close to the existing 220 kV structures to allow reconductoring of those retained structures. If the 66 kV subtransmission line relocation is determined to be necessary, the Iowa Street Underground Alternative would be implemented to eliminate the only significant and unmitigable impact from the long-term presence of the 66 kV line when viewed from the Cottage Lane residential subdivision (Impact VR-8).

Up to 110 additional interset towers would be required where the spans between retained towers exceed the strength of existing towers, and at locations where conductor blowout (where conductors could sway horizontally, potentially result in insufficient horizontal safety clearance to the adjacent line) could occur. Intersect structures would be required for about one-third of all spans along the retained line. The Phased Build Alternative would allow the retention of nearly 160 existing structures that would be demolished and re-built under the Proposed Project.

In Segment 5 on all Morongo land, the Phased Build Alternative structures would be exactly the same as those of the Proposed Project. All transmission facilities in the westernmost 3 miles would be removed and relocated south to the new ROW closer to I-10. In this segment, 19 pairs of new double-circuit tubular steel poles would be installed and the high-capacity conductor would be installed on the new poles. On the eastern portion of the Morongo land, all existing structures would be removed, and 30 pairs of new double-circuit lattice steel towers would replace the existing single-circuit towers (same as for the Proposed Project), and h High-capacity conductors would be installed on these new towers as well as the existing double-circuit towers. As described in Section ES.3.2 and Appendix 5 (Section 4.4) of this Addendum, there are two options to the Phased Build Alternative for Segment 5. Implementing either of the options would ensure that there would be no future construction activity of new structures on Morongo land.

Summary of Significant Unavoidable (Class I) Impacts

The **Proposed Project** in would have 5 significant (Class I) impacts affecting the 220 kV segment. The **Phased Build Alternative** would reduce the severity of impacts AQ-1 and N-1 as perceived at nearby residences, but the impacts would remain significant. However, the alternative would reduce the significance of Impact VR-8 in Segments 4 and 6 to less than significant levels, primarily due to the project being located nearer to the center of the ROW, rather than at the edge of the ROW as in the Proposed Project. The 5 Class I impacts are:

- **Impact AQ-1:** Construction would generate dust and exhaust emissions of criteria pollutants.
- **Impact CL-2:** Construction, operation and maintenance, and restoration would cause an adverse change to unknown buried prehistoric and historical archaeological sites or buried Native American human remains.

- **Impact N-1:** Construction noise could substantially disturb sensitive receptors or violate local rules, standards, and/or ordinances.
- **Impact VR-2:** Construction would result in visual contrast due to vegetation removal.
- **Impact VR-8:** Long-term presence of the project would result in landscape changes that degrade existing visual character or quality.

Comparison of Impacts

The Phased Build Alternative is preferred over the Proposed Project because it would reduce construction impacts due to the retention of about 160 existing structures. This would reduce the severity of (–but not render less-than-significant), Impacts the CL-2, AQ-1 and N-1. –construction impacts (eliminating the removal and reconstruction of the existing 220 kV structures and relocation of the 66 kV subtransmission lines). This reduced level of construction results in 20 to 25 percent less ground disturbance with the Phased Build Alternative, although impacts to biological resources and other water- and soil-related impacts would be less than significant with the implementation of mitigation for both the Proposed Project and the alternative. Additionally, all structures in this alternative would be located farther from the edge of the ROW than with the Proposed Project, so noise, dust, and construction disturbance would occur farther from sensitive receptors located at the edge of the ROW, compared to the Proposed Project. Furthermore, the Phased Build Alternative is preferred over the Proposed Project because it would reduce operational impacts (visual presence of the Proposed Project closer to the south edge of the ROW in Segments 4 and 6 and from the 66 kV line along Iowa Street) to less than significant levels for some residential locations. As a result, **the Phased Build Alternative has been found to be environmentally superior to the Proposed Project.**

Table G-4 (updated from the Final EIR) presents a comparison of the Phased Build Alternative with the Proposed Project for the environmental disciplines that would be significant and unmitigable (Class I) for the Proposed Project. This updated table does not include disciplines that are not factors in the comparison (agriculture, climate change, socioeconomics and environmental justice, hazards and hazardous materials, mineral resources, recreation, utilities and public services, wildland fire, and electrical interference).

Table G-4. Comparison of the Proposed Project to Phased Build Alternative

| Issue Area | Proposed Project | Phased Build Alternative |
|---|--|---|
| Air Quality (Class I) | <u>More extensive demolition and construction. Structures would be closer to edge of ROW where sensitive receptors are located</u> | Preferred <u>Reduced construction activity results in less emissions.</u> |
| Cultural Resources (Class I) | <u>More extensive demolition and construction</u> | Preferred <u>Less ground disturbance would reduce the potential to adversely affect unknown buried prehistoric and historical archaeological sites or buried Native American human remains. However, similar to the Proposed Project, this potential impact would remain significant and unmitigable (Class I).</u> |
| Land Use and BLM Realty (Class II) | <u>More extensive demolition and construction. Structures would be closer to edge of ROW where sensitive receptors are located</u> | Preferred <u>Impacts to sensitive receptors would be reduced due to a lower level of construction. Operational visual impacts would be reduced by increasing the distance of structures from sensitive receptors at the edge of the ROW.</u> |

Table G-4. Comparison of the Proposed Project to Phased Build Alternative

| Issue Area | Proposed Project | Phased Build Alternative |
|--|--|--|
| Noise (Class I) | <u>More extensive demolition and construction</u> | Preferred <u>Reduced level of construction that is generally located farther from the edge of the ROW. The severity of the substantial adverse noise effect for the nearest sensitive receptors would be reduced since the level of construction noise attenuates with increased distance from the source. However, similar to the Proposed Project, impacts from construction noise would remain significant and unmitigable to nearby sensitive receptors.</u> |
| Paleontological Resources (Class II) | <u>More extensive demolition and construction</u> | Preferred <u>Less ground disturbance would reduce the potential to adversely affect paleontological resources.</u> |
| Transportation and Traffic (Class II) | <u>More extensive demolition and construction</u> | Preferred <u>Reduced level of construction would reduce the number and duration of construction-related vehicle trips in the area.</u> |
| Visual Resources (Classes I, II, III) | <u>Significant and unmitigable visual impacts on sensitive receptors (residences) during both construction and operation</u> | Preferred <u>Visual impacts less than significant in some locations due to greater distance of towers from residences. Possible elimination of 66 kV line relocation along Iowa Street. If the 66 kV system must be relocated, impacts would be reduced to less than significant with the Iowa Street 66 kV Underground Alternative.</u> |
| Construction Effects: Traffic, Geology/ Soils, Water Resources | <u>More extensive demolition and construction</u> | Preferred <u>Reduced level of construction would reduce the severity and duration of construction-related activities in the area.</u> |

G.5 Definition of the CPUC Environmentally Superior Alternative

All three alternatives discussed in Section G.4 are considered to be environmentally superior to the Proposed Project. The Phased Build Alternative would have its structures located closer to the center of the ROW, and would incorporate the tower locations of the Tower Relocation Alternative. Also, under the Phased Build Alternative, the Iowa Street 66 kV Underground Alternative ~~would~~ may not be necessary, because relocation of the 66 kV subtransmission lines ~~would~~ may or may not be required in Segment 1. As a result, ***the Phased Build Alternative is considered environmentally superior overall.*** This alternative ~~would~~ may not require ~~any~~ the 66 kV subtransmission system modifications, but the distribution, telecommunications, and substation upgrades would be the same as for the Proposed Project. The Environmentally Superior Alternative is illustrated in Figure G-1 (unchanged from the Final EIR).

The second preferred alternative would be the combination of the Tower Relocation Alternative, the Iowa Street 66 kV Underground Alternative, and the Proposed Project for the segments unaffected by those two alternatives. The least environmentally preferred would be the Proposed Project.

Section H. Mitigation Monitoring and Reporting

One change to Final EIR Section H has been made in response to SCE's Opening Brief, as indicated below.

H.5.2 Construction Personnel

A key element in the success of mitigation and mitigation monitoring is the full cooperation of construction personnel and supervisors. Successful implementation of many of the mitigation measures requires specific actions and behaviors on the part of the construction supervisors or crews. To ensure success, the following actions, detailed in specific mitigation measures included in the MMCRP, would be taken:

- Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. ~~Procedures to be followed by construction crews would be written into a separate agreement that all construction personnel would be asked to sign, denoting consent to the procedures.~~
- As specified by mitigation, a Worker Environmental Awareness Program (WEAP) would be conducted to inform and train construction personnel about the requirements of the monitoring program (as detailed in the MMCRP). The CPUC/BLM Environmental Monitors would verify that each crew member received the required training.
- A written summary of mitigation monitoring procedures would be provided to construction supervisors for all mitigation measures requiring their attention.

Appendix 5, Alternatives Screening Report

Updated Description of Phased Build Alternative

Appendix 5, Section 4.4 are presented with underlining and ~~strikeout~~ to indicate changes made after publication of the Final EIR in December 2015.

4.4 Phased Build Alternative

This alternative has been retained for analysis because it would avoid most of the environmental impacts associated with removal of the existing double-circuit towers and construction of new double-circuit towers, while still allowing import of generation from all the reasonably foreseeable generation projects defined by the CAISO. This was evaluated through independent power flow modeling to determine whether the alternative would satisfy the CAISO's 2024 Reliability Base Case, which includes the generation that was under construction or had received regulatory approval at the time of CAISO's 2013/2014 transmission planning process.² The alternative components are illustrated in Figures Ap.5-5a and Ap.5-5b.

Alternative Description

This alternative is derived from the project proposed by SCE in 2005 as the West of Devers System Upgrades. The purpose of this alternative is to reduce construction by retaining ~~as many~~ nearly all of the existing tower structures ~~as possible~~ and installing lighter-weight but higher-performance conductors on the retained towers. The high-performance conductors would maximize power transfer and avoid structurally overloading the majority of existing towers. The alternative would:

- **Remove and replace existing single-circuit towers.** In most of the existing right-of-way (ROW), the two sets of existing single-circuit towers would be removed and one set of new double-circuit towers would be constructed to replace the removed towers. The new set of double-circuit towers would be constructed in the existing ROW paired with existing/retained structures, generally immediately north or south of the existing double-circuit towers, as detailed by segment below. The new set of double-circuit structures would be installed with an approximately 50-foot separation from the centerline of the existing (retained) structures, as defined for the Proposed Project.
- **Install interset towers where required.** Up to 110 interset structures would be required in Segments 3, 4, and 6. These structures would be required where the spans between retained towers exceed the strength of existing towers, and at locations where conductor blowout (where conductors could sway horizontally, potentially result in insufficient horizontal safety clearance to the adjacent line) could occur.
- **Ensure compliance with the requirements of the Tower Relocation Alternative** (as described in Final EIR Section 4.2). The Phased Build Alternative would retain (and not remove) most existing double-circuit structures near the center of the ROW. Constructing the second line adjacent to the retained structures ensures that no new structure would be located nearer to the edge of the ROW ~~an adjacent residence~~ than is currently the case.

² The Phased Build Alternative would have capacity for all the generation included in the CAISO 2024 Reliability Base Case (see Attachment 2 to this Appendix, pages 5-6 and page 21, Table A4). This scenario includes 3,754 MW of Total Generation On-line and 6,901 MW of Total Generation Capacity), from renewable and conventional resources, as well as the power flow on the system resulting from import of 1,400 MW from the Imperial Irrigation District into the LA Basin.

- **Retain existing double-circuit towers.** ~~Most of the existing double-circuit towers would be retained. Prior to reconductoring some existing structures would be strengthened and their heights increased.~~
- **Install high-capacity conductors on all four circuits.** Both the new and existing 220 kV double-circuit towers would have the “795 Drake” Aluminum Conductor Composite Reinforced (ACCR) installed, with the exception of Segment 1, where only two of the existing four circuits would be modified.
- **Allow for future capacity expansion of the existing corridor** with several optional future phases. These phases would be implemented as generation projects become certain and capacity is clearly required. Because the Phased Build Alternative would accommodate projects now defined in the CAISO’s 2024 Reliability Base Case, it may be 10 years or more before additional upgrades are needed. The configuration of future transmission expansion that may be required cannot now be predicted, and would depend on many factors, including type and location of future renewable generation, the type and location of future transmission upgrades by SCE or other parties, and the regulatory systems and policies in place to define prudent investment in transmission capacity for renewable energy (e.g., policies differentiating between energy only procurement versus full capacity deliverability). The future phases could include:
 - Reconductoring of the newly constructed 220 kV structures with higher capacity conductors;
 - If required (based on assessment of structure strength with added interspersed structures), replacing some of the retained 220 kV structures with new, stronger 220 kV structures in order to carry heavier, higher capacity conductors;
And/or:
 - Installation of a single- or double-circuit 500 kV or 220 kV line in the vacant space remaining in the ROW.

In Appendix B of its Opening Brief, SCE stated that installation of the Phased Build Alternative’s 795 ACCR conductor would require modification of SCE’s planned wire stringing plan. The CEQA team agrees that the use of ACCR conductor would require changes to SCE’s existing wire stringing plan, and that the PBA would likely result in a larger overall number of wire stringing sites due to the lower bending angle that ACCR allows. The majority of the stringing sites that SCE has defined for the Proposed Project would still be usable for the ACCR used in the Phased Build Alternative. Some different wire stringing sites would likely be required for ACCR, which would replace sites originally defined for the Proposed Project (ACSR) conductor, and some new sites would also be required.

In Segment 5 on Morongo land, the Phased Build Alternative ~~structures would look be exactly the same as those of very much like~~ the Proposed Project, as illustrated in Figure Ap.5-5b, and would incorporate the Morongo relocation of a part of the ROW and use of tubular steel poles. Under the SCE-Morongo ROW agreement, the Morongo Band may conclude that the Phased Build Alternative does not satisfy SCE’s obligation to timely obtain all required regulatory approvals of the Proposed Project. If the Morongo Band concludes that this alternative does not satisfy SCE’s obligations, the Morongo Band could direct the Department of Interior to cancel the ROW, which would create a legal impediment to this project alternative.

The Phased Build Alternative would use a composite reinforced conductor in an appropriate size to allow import from all generation projects that are reasonably foreseeable (i.e., included in the CASIO’s 2024 Reliability Base Case, as well as allowing import of an additional 1,400 MW from the Imperial Valley). A high-performance conductor weighs less and has lower thermal expansion than the SCE-standard ACSR conductor, resulting in less sag for an equivalent strength and durability as the ACSR conductor. Therefore,

using an alternative conductor in conjunction with interset towers would satisfy the basic project objectives while simultaneously avoiding the need to rebuild towers in the corridor.

Configuration by Project Segment. The Phased Build Alternative would be configured differently in these the following segments:

Segment 1 would be configured to:

- Retain the existing double-circuit 220 kV towers and the San Bernardino–Vista and Etiwanda–San Bernardino circuits without change.
- Re-use the existing double-circuit 220 kV towers, and reconductor to replace the two existing circuits in the 220 kV positions nearest to the edges of the ROW so that Devers–San Bernardino and El Casco–San Bernardino use a new 795 Drake ACCR conductor.
- Either retain or relocate the all existing 66 kV circuits, based on final design. in Segment 1 in place and unmodified. (Note that in this alternative If the 66 kV circuits are required to be relocated, the Iowa Street 66 kV Underground Alternative would not still be required (as with the Proposed Project). If the 66 kV circuits are not relocated, because that Iowa Street Underground Alternative would not be required. segment of 66 kV line would not be required.)

Segment 2 would be configured to:

- Re-use the majority of existing double-circuit 220 kV towers (replacing approximately 6 towers), and reconductor so that both existing circuits between Devers–Vista use a new 795 Drake ACCR conductor.
- Retain all existing 115 kV circuits in Segment 2 in place and unmodified.

Segment 5 (including Morongo Land and non-Morongoland) would be configured as follows:

- All existing 220 kV structures on Morongo Land would be removed and replaced with two sets of new double-circuit tubular steel poles and double-circuit lattice steel tower structures (see description of tubular steel poles [TSPs] below) having the same strength capabilities and spacing as the Proposed Project double-circuit towers.
- In the westernmost 3 miles of tribal land, all transmission facilities in the existing ROW would be removed and relocated south to new ROW closer to I-10, as defined for the Proposed Project. For the 17 pairs of new structure pairs that SCE and Morongo have agreed would be TSPs in the Proposed Project, those would be TSPs in this alternative. The remaining structures on Morongo land would be lattice steel towers, as in the Proposed Project. ~~with tubular steel pole and double circuit lattice steel tower structures~~
- On private land in Segment 5, the existing double-circuit structures would be retained. The two sets of single-circuit 220 kV structures would be removed and replaced with a single set of new double-circuit lattice steel towers having the same strength capabilities and spacing as the Proposed Project double-circuit towers.
- All conductors in Segment 5 would be conductored with 795 Drake ACCR.
- The Morongo towers would be able to support 1590 kcmil conductors (if required in the future), so no future structure replacement would be required on Morongo land. On private land in Segment 5, the retained structures would have to be replaced with stronger structures in order to support the 1590 kcmil conductors (if they are determined to be needed).

- ~~In this westernmost segment, 19 pairs of new double-circuit tubular steel poles would be installed and the high-capacity conductors (795 Drake ACCR) would be installed on the new poles.~~

~~On the eastern portion of the Morongo land, 30 pairs of new double-circuit lattice steel towers would replace the existing single-circuit towers; high-capacity conductors (795 Drake ACCR) would be installed on these new towers.~~

Two options for Segment 5 are suggested for agency consideration, if the Phased Build Alternative is adopted:

Segment 5, Phased Build Alternative Option 1

Option 1 would have the same structures as the Proposed Project in all of Segment 5, but would be conductored with 795 Drake ACCR conductor at this time. All Segment 5 towers (not only the approximately 60 percent on Morongo land) would be removed and replaced with the Proposed Project tubular steel pole and double-circuit lattice steel tower structures, capable of supporting 1590 kcmil conductors. This would acknowledge the complex land ownership pattern in Segment 5, where the current ROW runs along tribal/private parcel boundaries. This option would ensure that no future tower construction would occur in Segment 5. However, there would be future construction activity related to reconductoring from Drake 795 to 1590 kcmil conductors.

Segment 5, Phased Build Alternative Option 2

Option 2 would have the same structures and conductor as the Proposed Project in all of Segment 5. All of Segment 5 (both Morongo and private land) would be initially conductored with 1590 conductor and not 795 Drake ACCR conductor. This would eliminate all possible future effects on Morongo lands, including use of access roads, pull sites, or shoo flies.

Segments 3, 4, and 6 would be configured as follows:

- As with the Proposed Project, reconfigure San Bernardino Junction to accommodate the new double-circuit tower line north of the existing double-circuit towers. This means that the Devers–San Bernardino and El Casco–San Bernardino circuits would be on the northern side of the existing ROW in Segment 3.
- The intent of the Tower Relocation Alternative (TRA) is incorporated into the Phased Build Alternative: For the 29 pairs of towers included in the TRA, the existing double circuit structures (which would be retained in the Phased Build Alternative) are located near the center of the ROW, so the new adjacent structures would be approximately 50 feet from the existing structures. In all cases, the new towers would be farther from the edge of the ROW than the now existing towers.
- Re-use most of the existing double-circuit 220 kV towers and reconductor those two circuits using new 795 Drake ACCR conductor.
- Remove the two single-circuit 220 kV structures and replace them with a single set of new double-circuit towers having the same strength capabilities and spacing as the Proposed Project double-circuit towers, and install new 795 Drake ACCR conductor for both circuits. The single set of new double-circuit towers would be north of the existing double-circuit towers in Segment 3 and in Segment 4 near El Casco Substation. In the remainder of Segment 4 and in Segment 6, the single set of new double-circuit towers would be south of the existing double-circuit towers.
- Reconfigure Banning Junction to eliminate individual 220 kV circuit crossings. To avoid circuit crossings at Banning Junction, the Devers–San Bernardino and Devers–El Casco circuits would be on the northern

side of the ROW for all of Segments 4, 5, and 6, and both Devers–Vista circuits would be on the southern side of the ROW.

The new double-circuit towers that would be constructed would be located ~~at least~~ approximately 50 feet north of the existing double-circuit towers in Segment 3 and ~~at least~~ approximately 50 feet south of the existing double-circuit towers in Segments 4 and 6. The types of new double-circuit towers in Segments 3 through 6 would have the strength capabilities and spans of the Proposed Project double-circuit towers and would be capable of future upgrade to the Proposed Project conductors. The strength of the newly built towers would mean that the new double-circuit structures could be reconducted in the future with the SCE-proposed 2B-1590 kcmil conductor, although a double-bundled conductor is not part of the alternative considered here.

SCE reviewed the description of the Phased Build Alternative in comparison with the Proposed Project and found that the construction plan for the Phased Build Alternative would require either (a) several more multiple line outages, due to the removal of existing conductors from the retained double-circuit towers before new conductors could be installed, or (b) greater use of numerous temporary structures (shoo-flies) to carry existing energized conductors while new conductors are installed on the existing double-circuit towers (Response to Data Request ALT-29: SCE, 2014/2015). SCE evaluated alternative scenarios for construction of this alternative, and concluded that using shoo-flies to carry energized conductors (the second option) would be preferred in order to mitigate the need for multiple line outages. Because of the need to schedule and plan for outages, overall construction of this alternative would take about the same amount of time as the Proposed Project.

The Proposed Project would give the WOD corridor a large planning margin of capacity to handle power flow during all conditions and for future growth. Independent power flow modeling was conducted to assess the loading in each of the corridor's circuits, during normal operations and during times when one or more circuits are out of service. Attachment 1 to Appendix 5 presents data and discussion that compare the ability of the Proposed Project with the Phased Build Alternative to handle anticipated power flow loads.

Construction Disturbance. The Phased Build Alternative would result in ~~substantially~~ at least 20 percent less overall construction activity taking place in the ROW than the Proposed Project. A reduction in the level of construction activity results in direct reductions in vehicle emissions, dust, noise, loss of habitat, erosion, and visual disruption. The specific construction differences are:

- Proposed Project would require ~~460~~ 467 new standard structures (both lattice steel towers and tubular steel poles) to be constructed and ~~556~~ 600 structures to be removed;
- Phased Build Alternative would require ~~216~~ between 260 and 265 new standard structures to be constructed and approximately 360 to 365 structures to be removed. The Phased Build Alternative avoids the Proposed Project's need to remove approximately 160 existing double-circuit structures.
- Using very conservative (worst-case) estimates, the Phased Build Alternative would require installation of approximately 105 to 110 interset structures to be constructed. Use of interset towers eliminates the need to replace or strengthen most of the approximately 30 percent of retained towers (as was defined in the Final EIR).
- No interset structures would be required for the Proposed Project.
- Proposed Project would require 51 temporary shoo-fly structures to be constructed and then removed in the 220 kV segment; and the Phased Build Alternative would require 136 temporary shoo-fly structures to be constructed and then removed in the 220 kV segment. According to SCE's data (see

Final EIR, Table B-13), the temporary ground disturbance for installation and removal of shoo-flies would be 125 acres for 300 shoo-flies, or 0.42 acres per shoo-fly, so the 85 additional shoo-flies would create 35 acres of additional temporary disturbance.

Overall, the reduced construction required for the Phased Build Alternative would result in 20 percent to 25 percent less new structure construction than the Proposed Project and it would avoid the need to demolish nearly 160 structures. Both permanent and temporary ground disturbance would also be reduced by 20 percent to 25 percent. In addition, the new double-circuit structures would be moved further from the edge of the ROW than the Proposed Project.

Consideration of CEQA Criteria

Project Objectives, Purpose and Need

Basic Project Objective 1, Increase system deliverability: The Phased Build Alternative would allow SCE to fully deliver about 3,000 MW of the output from new generation projects, so it fully achieves Basic Project Objective 1 by providing an increase in deliverability that is 1,400 MW over the present capability of 1,600 MW and at least 2,200 MW over the capability of the WOD 220 kV corridor before the Proposed Project was planned, which was limited to approximately 550 MW. Based on power flow modeling completed for this alternative (see results in Table A3 in Attachment 2 to this appendix), this alternative satisfies the CAISO's 2024 Reliability Base Case, which includes specific generation projects that the CAISO has determined to be most likely to be constructed plus a scenario of 1,400 MW from IID to the CAISO.

Section A.2.1.4.1 of the is Final EIR describes the generation projects whose capacity is expected to be carried by the Proposed Project, and explains how these projects are categorized for the EIR. Table Ap.5-3 shows the projects accommodated and likely to be made deliverable by the Phased Build Alternative.

Basic Project Objective 2, Support renewable energy goals: This alternative would facilitate progress toward achieving California's RPS goals by adding more than 800 MW of transfer capacity for renewable energy projects located east of Devers Substation while accommodating at least 1,000 MW of future growth.³ This would support increased import of renewable generation into the Los Angeles basin.

³ The EIR preparers asked CPUC RPS Staff to test the "RPS Calculator" to show how future renewable resource portfolios might change with a smaller upgrade to WOD than SCE has proposed. With RPS Calculator V.5: there would be no additional transmission capacity needed elsewhere in the state to make up for generation decreased in Riverside East; and renewable generation in Westlands or other zones (including San Diego South and Solano) would replace the generation decreased in Riverside East, using existing transmission capacity available in the other zones. With RPS Calculator V.6.1: there would be no impact on the generation selected in Riverside East or elsewhere.

Table Ap.5-3. Projects Accommodated by the Phased Build Alternative

| Projects Considered to be Connected Actions | Projects Considered to be Cumulative | Projects Considered to Fill Remaining Growth-Inducing Capacity |
|---|--|---|
| Analyzed in Section D, Environmental Analysis | Analyzed in Section E, Cumulative Scenario and Impacts | Analyzed in Section F Other CEQA Requirements |
| <ul style="list-style-type: none"> • Palen Solar Power Project (500 MW solar thermal, CAISO Queue 365) • EDF Desert Harvest (150 MW solar PV, CAISO Queue 643AE) • 50 MW Solar PV Project connecting to Blythe–Eagle Mountain 161 kV line (CAISO Queue 421) • 250 MW Solar PV Project Connecting at Red Bluff Substation 230 kV (CAISO Queue 1070) • 224 MW Solar PV Project connecting at Colorado River Substation 230 kV (CAISO Queue 576) • 150 MW Solar PV Project connecting at Colorado River Substation 230 kV (CAISO Queue 970) • 150 MW Solar PV Project Connecting at Colorado River Substation 230 kV (CAISO Queue 1071) | <ul style="list-style-type: none"> • Blythe Energy Project, Phase II (570 MW gas-fired combined cycle plant) • NextEra Genesis Project and NextEra McCoy Project (250 MW solar trough; 250 MW solar PV) • NextEra Blythe Project (485 MW solar PV) • IID Path 42 Upgrades (230 kV transmission line) • CAISO Queue 798 (221 MW solar PV connecting at Colorado River Substation; energy only) | <ul style="list-style-type: none"> • None accommodated by Phased Build Alternative |
| <p>1,474 MW generation from Connected Actions accommodated by Phased Build Alternative (Same as the Proposed Project)</p> | <p>1,776 MW generation from Cumulative Projects accommodated by Phased Build Alternative, plus additional power flow across Path 42 Upgrades (Note: this does not include the Delaney–Colorado River 500 kV Transmission Line that could be accommodated by the Proposed Project.)</p> | <p>0 MW generation to fill Growth-Inducing Capacity accommodated by Phased Build Alternative (1,571 MW less than the Proposed Project)</p> |

Basic Project Objective 3, Maximize remaining space in the corridor: The Phased Build Alternative would meet this objective by removing the existing single-circuit towers to create space for future transmission lines, including a 500 kV line within the ROW, although less space would be available than with the Proposed Project. In this alternative, some new double-circuit towers in Segments 4 and 6 (as defined in the Tower Relocation Alternative) would be placed further from the south edge of the ROW, resulting in the structures being 50 feet farther from residences in Segments 4 and 6 than under the Proposed Project. There would remain adequate space within the ROW (up to 175 feet) for transmission expansion, if needed by SCE in the future, as shown in Table Ap.5-2. As with the Proposed Project, any future 500 kV line within the ROW would need to cross the 220 kV circuits at or near the El Casco Substation. See EIR Section E.2.3.2 for additional information on this Cumulative Transmission Scenario.

Feasibility

Legal and Regulatory Feasibility. While the Morongo Band has a conditional contractual right to terminate its ROW Agreement with SCE, the Phased Build Alternative appears to be preliminarily feasible considering

legal and regulatory factors, because it is currently uncertain whether the Morongo Band may or will exercise that right, and particularly because on Morongo lands the alternative is entirely consistent with the Project (as defined in Exhibit A to the DCA). Although the alternative is designed to meet the same project objectives as the Project described in the ROW Agreement and DCA and the tower structures would be exactly the same as SCE's Proposed Project on Reservation lands, comments from the Morongo Band assert that this alternative may be legally infeasible given the right of the Morongo Band to terminate the ROW Agreement if the SCE does not secure approvals by January 1, 2017 for the project described in the DCA (which arguably differs from the Phased Build Alternative in the tower locations off the Morongo Band lands, but is wholly consistent on Morongo Band lands). That termination right, however, has not been exercised and thus no such legal infeasibility currently exists. If that right is properly and timely exercised by the Morongo Band in the future, no transmission upgrades could be constructed across the Reservation absent the subsequent execution of a replacement ROW Agreement.

Technical Feasibility. The technical feasibility of the alternative has been evaluated based on SCE's responses to CPUC data requests, augmented by independent reviews in two technical areas: the ability of the existing structures to be reused and reconducted, and the ability of the new alternative conductor to handle anticipated power flow loads. Based on these efforts, this alternative appears to be feasible based on the following considerations.

Using the lighter-weight Drake 795 conductors on the existing double-circuit towers would increase the capacity of the circuits and postpone the impacts of rebuilding or replacing the towers that cannot support the larger conductors that areas proposed. These conductors are 70 percent as heavy as the existing 1033.5 kcmil ACSR used in the corridor.⁴

Based on information provided by SCE subsequent to issuance of the Final EIR, the use of 795 Drake ACCR conductor and soldiering of new towers adjacent to the existing line, as called for in the Phased Build Alternative, will necessitate the addition of up to 110 interset towers to eliminate conductor blowout. The use of these interset towers will eliminate the need for replacement or modification of most of the 30 percent of existing double-circuit structures that SCE had previously identified in Data Requests⁵, because it is assumed that the interset structures would utilize SCE's "new stronger" tower design and would greatly reduce the length of span supported by the retained structures, thereby keeping loads within the capability of the existing structures in nearly all cases.

■ **Use of ACCR.** While ACCR is not one of SCE's typical conductor types, high capacity conductors are commonly used by major utilities. High Temperature Low Sag (HTLS) options exist to the proposed 1590 ACSR conductors; these HTLS conductors are commercially available and need to be explored further for feasibility. HTLS conductors are a proven and accepted technology in the electric utility industry for upgrading capacity in existing corridors and on existing structures as well as for new line construction. HTLS conductors can normally operate at much higher temperatures. Therefore, it is possible to greatly increase power transfer capacity, compared to an equivalent ACSR type of conductor, while maintaining required clearances, because of the low sag nature of HTLS conductors. ACCR conductor was first commercially installed in the United States in 2001 by Xcel Energy and at a 2005

⁴ ACSR and ACCR weights and capacities are derived from vendor technical properties fact sheets. Rated ampacity at 75° C for ACSR and 210° C for ACCR. (3M, 2015) http://solutions.3m.com/wps/portal/3M/en_US/EMD_ACCR/ACCR_Home/TechnicalInfo/ProductDataSpecs/

⁵ SCE Response to Data Request ALT-18a indicated that up to 30 percent of the existing double-circuit structures would need to be replaced or modified to provide increased strength and/or heights increased in order to support the 795 Drake ACCR conductor in this alternative, but this need no longer exists due to the shortening of spans that occurs with the addition of interset towers.

test site operated by San Diego Gas & Electric (SDG&E) in Oceanside (CEC, 2008). since that time it has been used domestically by multiple utilities, such as Pacific Gas and Electric (PG&E) near Santa Clara, Western Area Power Administration, Arizona Public Service, Silicon Valley Power, Alabama Power and Platte River Authority at voltages up to 230 kV and for critical generation tie lines. This type conductor and the comparable aluminum conductor composite core (ACCC) conductor are also used internationally by utilities like British Columbia Transmission Corporation and Shanghai Power. Another common HTLS conductor used by PG&E is the aluminum conductor steel supported (ACSS) type, which is used in new circuits serving the San Francisco peninsula and East Bay area including the Eastshore, San Mateo, and Dumbarton Substations.

- **ACCR is not one of SCE's typical conductor types.** As a result, SCE would have to develop a new spare-parts inventory system and implement worker training for operation and maintenance of this conductor type.
- **Line losses:** ACCR material has higher electrical losses. These losses would result in economic consequences, but these would have to be compared to the reduced construction cost achieved from the reuse of the existing 220 kV towers. The actual level of electrical losses, which depends on line loading, and potential sources of energy that would need to change dispatch to overcome the losses have not been quantified. Incremental GHG emissions would be minimized because upstream electric generation facilities are primarily renewable.
- **Vacant space within ROW:** This alternative would result in adequate space in the ROW for future expansion by removing the existing single-circuit towers, although the amount of space remaining would be limited by the locations of the existing double-circuit towers that would be reused and reconducted. Based on the locations of the existing double-circuit towers, there would remain adequate space within the ROW (up to 175 feet) for transmission expansion, if needed by SCE in the future.

Construction Timeframe. Because this alternative would avoid near-term construction related to removing and re-building all towers, there would be less overall construction activity with the Phased Build Alternative than with the Proposed Project. However, the alternative would result in a need to install a greater number of temporary structures (shoo-flies) to minimize line outages, and this would require scheduling and sequencing that could slow the pace of construction activities. While the reuse and reconductoring of the existing double-circuit towers would result in less construction activity overall, SCE's review of the alternative (Response to Data Request ALT-29) shows that the duration of construction could be similar to that of the Proposed Project. The construction plan defined by SCE may be able to be condensed through final engineering, but the environmental analysis assumes similar overall timeframes for the Proposed Project and the Phased Build Alternative.

Reliability. Like the Proposed Project, the Phased Build Alternative would comply with all reliability requirements of NERC, FERC, and the CPUC.

Environmental Advantages

The Phased Build Alternative would avoid many environmental impacts of the Proposed Project by retaining and reconductoring the existing double-circuit towers with high-performance conductor. In addition, by moving towers in residential areas farther from the south edge of the ROW, visual impacts are reduced.

If the relocation of the 66 kV line is found to be required in order to manage outages, then the Segment 1 impacts of the Phased Build Alternative related to this activity will be the same as those defined for the Proposed Project.

These advantages are summarized as follows:

- **Construction Activity and Ground Disturbance.** This alternative would reduce construction impacts (noise, air emissions, ground disturbance, traffic) because the existing double-circuit towers would remain in place, rather than being removed and replaced. This alternative would avoid the Proposed Project impacts related to removing all towers by reusing existing double-circuit structures for as long as possible. The existing reconducted towers would be replaced only after this alternative reaches the electrical capacity of its configuration. Even with additional required interset towers and required changes to the wire stringing plan, the Phased Build Alternative would require 20 percent to 25 percent less new structure construction (and associated ground disturbance) in comparison with the Proposed Project.
- **Visual Resources.** This alternative would reduce significant visual impacts to residences on south side of corridor (Beaumont, Calimesa, Banning, Whitewater) because the existing towers that would be retained are closer to center of ROW than the Proposed Project towers. This alternative would achieve the same visual benefit of the Proposed Project from removing the single-circuit towers, resulting in a less cluttered ROW with similar tower styles. While approximately 105 to 110 interset towers may be required, the location of all structures nearer to the center of the ROW still provides an overall visual benefit. In addition, the number of interset structures could likely be reduced through final design of this alternative, if it is selected by the CPUC and BLM. In final design, design of the alternative would not rely on the Proposed Project tower locations for interset towers. With a new design unconstrained by Proposed Project structure locations, the design could retain most existing double-circuit structures and develop a new layout for the soldiered (paired) new structures that incorporates appropriate engineering. This would almost certainly reduce the need for interset structures below the current estimate.

Environmental Disadvantages

There are two potential disadvantages of the Phased Build Alternative:

- **Later Construction of Phased Build Components.** One beneficial feature of this alternative is that it would reduce the amount of near-term construction activities required to removing the double-circuit towers (as required for the Proposed Project). The Phased Build Alternative may provide adequate capacity for 10 years or more (based on the CAISO's Reliability Scenario). However, depending on other transmission system upgrades, it is possible that over the longer-term, the implementation of this alternative could require future construction activities to increase system capacity.
- **Operations and Maintenance.** Using ACCR or other high-performance conductors would introduce new conductor materials that are not standard to SCE's routine operations. These conductors and spare parts, including specialized splices or connectors would require storage, and operating the system would involve additional training for SCE personnel.

Alternative Conclusion

Retained for Analysis. The Phased Build Alternative is retained for EIR analysis because it would reduce the environmental impacts of the Proposed Project. It would achieve all three Basic Project Objectives. In addition, this alternative is technically feasible. The alternative conductor type has been proven and is in use by other utilities.

See attached updated Figures Ap.5-5a and Ap.5-5b, at the end of this Addendum.

Supporting Documentation Responding to SCE's Opening Brief

This supporting documentation provides the responses of the CEQA team to specific issues raised in SCE's Opening Brief. The only issues addressed here are those related to the CEQA process or contents of the Final EIR. There are three sections presented under this heading:

- SCE's Opening Brief, Major issues
- SCE's Opening Brief, Appendix A (Suggested changes to mitigation measures)
- SCE's Opening Brief, Appendix B (Suggested changes to Phased Build Alternative)

Responses to CEQA Issues in SCE Opening Brief

A central theme of the SCE brief is that the Phased Build Alternative lacks evidentiary support and should be rejected because it does not meet the identified need, does not meet most of the project objectives, is not feasible from a number of perspectives, and would result in worse economic and environmental impacts as compared to the proposed WOD Upgrade Project. (Brief pp. 3-4)

Note that SCE's Appendix B presents similar specific issues related to the Phased Build Alternative; the CEQA Team's response is presented at the end of this Addendum (Responses to SCE Opening Brief, Appendix B).

- **SCE believes that the FEIR's determination that the Phased Build Alternative is environmentally superior is flawed because it:**
 1. lacks evidentiary support,
 2. does not meet the identified project need,
 3. does not meet certain project objectives,
 4. would result in worse environmental impacts relative to the WOD Upgrade Project,
 5. does not evaluate reasonably foreseeable environmental impacts associated with the Phased Build Alternative.

– **RESPONSE:** These assertions are not new and have been addressed in the Final EIR's Response to Comments. General Responses (GR) GR-1, GR-2 & GR-4 provide context:

From General Response GR-1: "The EIR is an informational document prepared in satisfaction of the requirements of CEQA. The EIR does not make a recommendation regarding approval or denial of the CPCN application, and it does not establish whether the project or an alternative is needed in the context of GO 131-D. The purpose of the EIR is to inform both the public and the decision-makers of the environmental impacts of the Proposed Project and alternatives and provide recommended mitigation measures to reduce or avoid any potentially significant impacts. The CEQA Guidelines Section 15126.6(d) requires an EIR to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison of those alternatives to the Proposed Project. In making a final determination on the CPCN application, the CPUC will consider the information contained in the EIR as well as in the formal evidentiary record."... "A wide range of generation and transmission projects that contribute to the need for the Proposed Project appear in the EIR (Section A.2.1.4), and some projects will drive the need for the Proposed Project more than others (Table A-4, Projects Contributing to Need for WOD Upgrade Project). However, it is not appropriate for the EIR to attempt to define the overall level of need or to speculate on the level of development that must be accommodated."

From General Response GR-2: “The Phased Build Alternative was developed and analyzed in the EIR because it is potentially feasible, it substantially satisfies all three basic project objectives, and it would reduce or avoid certain significant environmental effects of the Proposed Project.” ... “The ability of the Phased Build Alternative to meet Basic Project Objective 1 was confirmed with the power flow modeling presented in the EIR. The modeling analysis compared the SCE Proposed Project with the Phased Build Alternative in different power flow scenarios.” ... “Basic Project Objective 2 and Basic Project Objective 3 are qualitative in nature. The application submitted by SCE clearly established various objectives to “integrate and fully deliver” the output of generation projects and to facilitate progress toward achieving renewable energy goals. The EIR reflects the position of several commenters that increasing the capacity of the WOD transmission lines directly improves the ability for numerous renewable generation projects to interconnect (EIR Section A.2.3). Recognizing that the generation projects that plan to rely on the Proposed Project are primarily solar generation projects, Basic Project Objective 2 was established as a means of supporting access to renewable energy by increasing the capacity of the WOD transmission lines.” ... “As discussed in General Response GR-1, the information in the EIR must be balanced with information that will be considered during the evidentiary hearing on cost and project need. It is not appropriate for the EIR to attempt to define the overall level of need in the context of General Order 131-D and the CPUC General Proceeding or to speculate on the level of development that must be accommodated by the project or alternatives as determined through the CPUC General Proceeding process.”

From General Response GR-4: “The EIR demonstrates that the Phased Build Alternative would adequately allow for future capacity expansion within the existing ROW, which could be achieved through additional reconductoring of newly constructed facilities and/or replacement of the retained double-circuit structures, if needed (EIR Appendix 5, Section 4.4). Although the EIR notes that the future capacity expansion of the corridor could occur with the Phased Build Alternative, this is not part of the description of this alternative because the need for such future expansion is not yet foreseeable. The EIR description of the Phased Build Alternative shows that it allows for the import of generation from all the reasonably foreseeable generation projects defined within the CAISO 2024 Reliability Base Case.” ... “The EIR demonstrates, based on substantial evidence, that the need to expand the transmission capacity of the corridor is not currently a reasonably foreseeable consequence of the Proposed Project or any of its alternatives. This means that the EIR need not include environmental analysis of the potential impacts of such “future expansion” of the Phased Build Alternative because the need for such an expansion is not reasonably foreseeable at this time.”

Specific responses to SCE’s comments on the Draft EIR also address SCE’s reiterated assertions presented in its Brief, as indicated below:

- 1. Lacks evidentiary support** – (See Responses to Comments [RTCs] F1-6, F1-10, & F1-11) – Based on the analysis under each environmental discipline in Section D and the comparison of alternatives in Section G of the Final EIR, the Phased Build Alternative was determined to be environmentally superior to the Proposed Project based on substantial evidence contained in the record of proceedings.
- 2. Does not meet the identified need** – (See General Response GR-1 and RTCs F1-5 & F1-6) - The EIR does not determine the extent of the need for the project. The status of generation projects is constantly changing. Newly identified projects remain somewhat uncertain as to their ultimate outcome; historically, a large percentage of projects have been cancelled. Regardless of the changing nature, the EIR tabulates the projects and discloses potential environmental impacts of those related to the transmission line and future growth.

3. Does not meet most of the project objectives – (See RTCs F1-5, F1-7, F1-8, and F1-9) - As defined in detail in Final EIR Appendix 5 (Section 4.4, under Project Objectives, page Ap.5-51 through Ap.5-53), the Phased Build Alternative would meet all three Basic Project Objectives. The alternative would provide an additional 1,400 MW over the present corridor capability of 1,600 MW and at least 2,200 MW over the capability of the WOD 220 kV corridor before the Proposed Project was planned, which was limited to approximately 550 MW. This allows more import of renewable generation. The alternative also retains adequate vacant ROW space for future new transmission lines.

4. Would result in worse environmental impacts relative to the WOD Upgrade – (See General Response GR-4 and RTCs F1-12, F1-10, F1-14, & F1-17) – SCE attributes greater overall environmental impacts to:

(1) needing to remobilize construction efforts in future phases (if required) [See #5 below]

(2) use of 795 ACCR conductor, which would change the size and location of pull sites and create other impacts related to use of interset towers [SCE alleges that design constraints of the 795 ACCR conductor would require additional structures on both the existing and new tower lines, which may not be feasible given the space and topography of the WOD corridor, and interset structures would significantly increase the overall project disturbance area and would result in additional visual, noise, dust, and other resource area impacts. (Brief p. 35)]; and

(3) creating visual impacts because of interset towers and asynchronous tower placements.

Response to 4(1): First, the need for additional capacity and future phases of construction within the next 10 years is not yet determined. Accordingly, and as stated in General Response GR-4, the EIR does not evaluate impacts of potential future phases under the Phased Build Alternative.

Response to 4(2): Second, as the EIR notes, wire stringing sites as well as other construction parameters would be determined through final design for the Proposed Project or any alternative. While some increase or location change in wire stringing sites may be required, overall, the Phased Build Alternative results in a significant reduction in ground disturbance impacts because most existing double-circuit towers would not have to be demolished and reconstructed. See Final EIR Appendix 5, page Ap.5-51. With respect to SCE stated need for interset towers, the Final EIR did not acknowledge the need for these towers, but SCE's Brief has clarified the need for the interset towers. Based on this additional information, the EIR team has determined that 100 to 110 interset towers may be required along the project route. While this number would almost certainly be reduced through final engineering, even retaining this very conservative assumption, the Phased Build Alternative would reduce overall construction activity and ground disturbance by approximately 20 percent to 25 percent in comparison with the Proposed Project.

Response to 4(3): Third, based on SCE's additional engineering information presented in the Opening Brief explaining the need for some interset structures, this Addendum now recognizes that the additional structures would reduce the previously defined visual benefit of the Phased Build Alternative in comparison with the Proposed Project by adding additional permanent structures that were not previously considered under the Phased Build Alternative. However, the greatest visual benefit of the Phased Build Alternative would still be achieved through the retention of the existing double circuit structures, which are located near the center of the ROW – further from residences at the ROW margins. This benefit is unaffected by the addition of interset structures.

5. Does not evaluate reasonably foreseeable environmental impacts associated with the Phased Build Alternative (See General Response GR-4, and RTC F1-14) – SCE reasserts that possible future development in the corridor needs to be assessed as a reasonable foreseeable impact of the Phase Build Alternative. Although the EIR notes that the corridor's capacity could be expanded in various

ways after implementing the Phased Build Alternative, this potential expansion is not part of the description of this alternative because the need for such future expansion is not yet foreseeable. (More detail on this topic appears in General Response GR-4.) The EIR description of the Phased Build Alternative shows that it allows for the import of generation from all the reasonably foreseeable generation projects defined within the CAISO 2024 Reliability Base Case. The analysis in the EIR (Appendix 5, Section 4.4, p. Ap.5-54) shows that sufficient space would remain available for expansion, while recognizing that less space would be available under the alternative.

- **On the Morongo Reservation, the Phased Build Alternative cannot be constructed to match “precisely” the Proposed Project design and would have additional environmental impacts across the Reservation including the need to go back for a second round of construction to complete the next “phase.” (Brief p. 36)**

Consent of the Morongo Tribe is a critical prerequisite to route the Proposed Project or any facilities through the Reservation because of the Morongo Tribe’s sovereign immunity that does not allow condemnation of property. Without this consent, SCE would be forced to reroute the line around the Reservation—through sensitive habitat, numerous communities and wilderness areas—an alternative that was considered and rejected in the FEIR. (Brief p. 4)

- **RESPONSE:** See General Response GR-4 and RTC F1-12. Additional detail has been added to the description of the Phased Build Alternative (Appendix 5, Section 4.2) to make clear the construction that would be required on Morongo land under the Phased Build Alternative, and Figures Ap.5-5a and Ap.5-5b have been revised to more clearly explain the intent of the alternative. The Phased Build Alternative on Morongo land would include Proposed Project structures in the locations defined by SCE and approved by Morongo tribes in the Morongo Agreement. See also attached responses to SCE’s Opening Brief Appendix B.

- **If the Commission decides to select the Tower Relocation Alternative, the alternative should not be combined with the Iowa Street 66 kV Underground Alternative because the Iowa Street undergrounding is not needed to mitigate a significant environmental impact and the costs would unnecessarily burden ratepayers. (Brief pp. 33, 42)**

- **RESPONSE:** As stated in Section D.18.3.5 (CEQA Significance Determination for Proposed Project and Connected Actions) of the Final EIR, Impact VR-8 (Long-term presence of the project would result in landscape changes that degrade existing visual character or quality) would be a significant and unmitigable impact (Class I) from the Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands. As a result of this significant and unmitigable impact, the EIR identifies the 1,600 foot underground alternative in Iowa Street as a feasible means of avoiding the impact.

In Final EIR Section G.4.2 (Iowa Street 66 kV Underground Alternative), the Iowa Street Underground Alternative was found to be environmentally superior to the Proposed Project. The Final EIR states that this alternative would have more severe short-term impacts during construction in a number of resource areas (air quality, noise, traffic, water resources, and utilities). Construction of the alternative would also increase the likelihood of encountering cultural or paleontological resources. However, due to the elimination of the long-term Class I significant visual impacts, the Iowa Street 66 kV Underground Alternative was found to be the environmentally superior alternative in this segment of the 66 kV subtransmission line component. See also RTCs F3-431 and F3-441.

- **The Phased Build Alternative wrongly assumes that the new set of 220 kV double-circuit structures can be “soldiered,” or located, next to the existing 220 kV double-circuit structures without causing**

additional, significant environmental impacts and/or unacceptable safety and operational hazards. Using one set of the proposed new 220 kV structures results in structure placements that will not line up in the ROW next to the existing 220 kV double-circuit structures. (Brief p. 34-35)

The Final EIR erroneously dismissed SCE's comments regarding this potential blow-out impact and need to install interset structures by asserting, without any engineering studies, that the new set of 220 kV double-circuit structures would be stronger and therefore could be "soldiered" next to the existing 220 kV double-circuit structures. This is a fatal flaw as the strength of the existing and proposed structures is essentially the same, but given that the proposed 1590 conductor is significantly heavier than the 795 conductor it could not be strung on the existing 220 kV double-circuit structures because these structures are located at greater span lengths than the proposed 220 kV double-circuit structures. The Final EIR does not address this fatal flaw. (Brief pp. 35-36)

– **RESPONSE:** Based on SCE's additional engineering information provided in the Opening Brief, this Addendum acknowledges that 100 to 110 interset towers could be required in a worst-case scenario. However, even with the need for interset towers to prevent conductor blowout, the Phased Build Alternative would still require 20 to 25 percent fewer new structures overall, and would eliminate the need to demolish about 160 structures that SCE proposed to demolish (and then rebuild). This results in substantially less construction activity than the Proposed Project. The description of the Phased Build Alternative (Appendix 5, Section 4.2) has been expanded to make clear the use of interset structures. See response above and responses to SCE's Opening Brief Appendix B (Item 3).

■ **The Final EIR's analysis of the Phased Build Alternative does not satisfy the requirements of CEQA, because:**

1. the technical analysis of the alternative is fundamentally flawed and it is infeasible
2. the environmental review is deficient because the FEIR does not evaluate reasonably foreseeable environmental impacts of subsequent "phases" to accommodate renewable generation that had a high likelihood of occurring.

The Final EIR does not analyze the "Whole of the Action" for the Phased Build Alternative by ignoring reasonably foreseeable upgrade projects, thereby significantly underestimating the Phased Build Alternative's environmental impact. This results in a "chopping up" of the WOD Upgrade Project to focus on an initial phase instead of the whole action based on reasonably foreseeable transmission capacity needs for the area. This is prohibited under CEQA. (Brief pp.38-42)

– **RESPONSE:** On the first point, SCE previously commented on the adequacy of the technical analyses pertaining to the Phased Build Alternative. Responses that comprehensively address those comments and confirm the validity of the technical analyses have been prepared and are incorporated in the FEIR. Please see RTCs F1-F13 and General Response GR-3. As previously stated, the EIR evaluates a reasonable range of alternatives, including those which are found to be preliminarily feasible. As can be the case in CEQA proceedings, other circumstances and considerations may come into play such that the lead agency, at the time it considers a proposed project and its alternatives, deems a preliminarily feasible project alternative infeasible. However, this does not relieve the EIR of its obligation to consider preliminarily feasible alternatives.

On the second point, SCE previously made comments regarding the adequacy of the EIR's analysis of the Phased Build Alternative under CEQA. Responses documenting the fact that evaluation of the Phased Build Alternative satisfies all CEQA requirements were prepared and are incorporated in the FEIR. Please see RTCs F1-F13 and General Responses GR-1 through GR-4. Please note in particular, the following discussion in General Response GR-4:

- The approach taken by the EIR reflects and complies with the principles set forth by the California Supreme Court in *Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal.3d 376, 396 (1988). In that case, the court announced a two-part legal test for when an EIR for a proposed project must describe and include analysis of the environmental effects of either a “future expansion” of the proposed project or some “other action” that is a reasonably foreseeable a consequence of the proposed project. For the West of Devers Upgrade Project, the environmental analysis of the Proposed Project describes what could happen if a large-enough need to expand the corridor is presently evident.
- The EIR demonstrates, based on substantial evidence, that the need to expand the transmission capacity of the corridor is not currently a reasonably foreseeable consequence of the Proposed Project or any of its alternatives. This means that the EIR need not include environmental analysis of the potential impacts of such “future expansion” of the Phased Build Alternative because the need for such an expansion is not reasonably foreseeable at this time.

Stated another way, the construction of the proposed West of Devers Upgrade Project, or one of its alternatives, does not necessarily create a foreseeable need for a second transmission project or expansion of other existing transmission facilities. As noted in General Response GR-1 (Project Need), the EIR does not determine or define a specific level of need for the Proposed Project or any alternative to the project. These determinations are appropriately explored in the CPUC General Proceeding.

- **The Final EIR creates an artificially narrow “Basic Project Objective 1” designed to “increase system deliverability by at least 2,200 MW, which the FEIR acknowledges covers only “the initial group of 5 solar power generation projects that was planned,” and ignores reasonable foreseeable generation project associated with existing interconnection requests (Cluster 8) and renewable generation likely to be spurred by regulatory developments. The reasonable foreseeability of additional renewable development beyond the bare minimum covered by the Phased Build Alternative is made even more likely when viewed through the lens of recent policy developments, particularly increasing the Renewable Portfolio Standard (RPS) to 50 percent. (Brief, p. 39)**
 - **RESPONSE:** See General Responses GR-1 and GR-2, and RTCs F1-5 and F1-8. As stated there, Cluster 8 was not available at the time of the analysis of the Proposed Project and alternatives, and SB 350 had not been enacted. The Final EIR describes how trends may or may not influence the level of need for the project, but the decision on need remains within the scope of the CPUC’s General Proceeding. The policy changes and other new information identified in the Brief may be considered by the CPUC and BLM in their decisions. EIR Basic Project Objective 1 sets a floor that specifies 2,200 MW of additional deliverability must be achieved as a reasonable low-end for considering alternatives.
- **The Final EIR supports the need for the project and the Final EIR cumulative impact analysis provides additional evidence that the WOD transmission lines should be designed to accommodate reasonably foreseeable demand for the corridor capacity and to minimize the long-term environmental and economic consequences. (Brief p. 24-25)**
 - **RESPONSE:** This statement is incorrect; the Final EIR does not support the need for the Proposed Project or any alternative, as it does not specifically evaluate project need. See Final EIR, Response to Comment GR-1. The Final EIR does present the Phased Build Alternative, which is considered to be feasible because it accommodates a reasonable scenario of potential development (the CAISO 2024 Reliability Base Case).

The EIR's cumulative scenario defines a list of reasonably foreseeable future renewable generation and transmission. It also includes impact assessment for a double-circuit 500 kV line that may be required in the future if development of generation proceeds at a high rate. This information is provided to inform decision-makers about potential future scenarios. However, as stated above, the decision on project need remains within the scope of the CPUC's General Proceeding.

- **The FEIR ignores reasonably foreseeable generation projects associated with existing interconnection requests (Cluster 8) and renewable generation that will likely be spurred by recent regulatory developments in the DRECP area, Blythe and Desert Center areas, Coachella Valley (through Path 42) and from small-scale renewable development that relies on the corridor. The shorthand name chosen for the CPUC's Phased Build Alternative acknowledges that additional "phases" are anticipated and reasonably foreseeable (Brief, pp. 39-40)**

- **RESPONSE:** See Final EIR RTCs F1-6, F2-3, & B9-5. Cluster 8 was not available at the time of the EIR analysis. The naming of the alternative as the Phased Build Alternative does not define a specific need or timing for future phases, but simply acknowledges that there are several options for achieving the transmission capacity of the Proposed Project and beyond, if the Proposed Project's level of capacity is not now determined to be needed.

- **Prolonging the transmission constraints in this corridor by delaying the full build out into a second phase would likely delay the timing of when additional renewable resources could come on line and how quickly such renewables will count towards clean energy and climate goals. (Brief p. 43-44)**

- **RESPONSE:** See RTCs F1-20 & F2-13. SCE speculates that unspecified future renewable projects would be delayed in coming on line if the full transmission upgrade project is not built now. As noted in the Final EIR's responses to comments in General Response GR-2, the objectives listed by SCE in its PEA for the Proposed Project included no minimum generation level goals. However, the EIR reflects SCE's position and that of several commenters that increasing the capacity of the WOD transmission lines directly improves the ability for numerous renewable generation projects to interconnect (EIR Section A.2.3), and in doing so, the EIR includes the Phased Build Alternative to satisfy at least 2,200 MW of generation. As stated above, the decision on project need, which would encompass the likelihood of delaying other development, remains within the scope of the CPUC's General Proceeding. .

- **The analytical basis for the Phase Build Alternative is the ZGlobal Power Flow Analysis. Evidence from SCE and the CAISO demonstrates ZGlobal's analysis was based on incorrect assumptions and has serious technical flaws. SCE and the CAISO sponsored testimony that strongly critiqued ZGlobal's analysis as methodologically flawed, improperly developed, and erroneous in its conclusions. This testimony was not challenged and no updates or corrections to the many flaws were provided. Therefore, the numerous critiques of ZGlobal's analysis remain unrebutted, fundamentally undermining the weight that should be given ZGlobal's analysis or its flawed conclusions (Brief pp 47-49)**

- **RESPONSE:** SCE's brief represents that testimony provided in the Proceeding has not been rebutted. The Final EIR addressed in detail the topic of power flow analysis in responses to SCE's earlier comments on the Draft EIR/EIS. In particular, see Responses to Comment F1-6, F2-1, and F2-3. The ZGlobal analysis included a thorough power flow analysis and voltage analysis. Also see previous individual responses (including Responses to Comments F1-10 through F1-15) that discuss the conclusion made in the Draft EIR/EIS that the Phased Build Alternative is "potentially feasible" and eligible for consideration within an EIR. Additionally, Responses to Comments F1-6, F1-7, and F1-8 address the performance of the Phased Build Alternative in the various power flow modeling cases.

All generation assumptions within the CAISO's Cluster 7, Phase I, 2019 base case and the 2024 Reliability Base Case were unchanged from what was available on the CAISO's website (as disclosed in the EIR Appendix 5, Attachment 2, p. 7), and these were the most up-to-date base cases available on the CAISO's secure website at the time that the Draft EIR/EIS was prepared. The scenarios were selected prior to the availability of Cluster 8 case data; however, while conditions have changed and will continue to change, the EIR accurately recognizes that the interconnection queue changes often. The changing nature of generation planned in the region may ultimately reveal through the CPUC General Proceeding that the Phased Build Alternative is infeasible, after considering the information in the record on currently proposed projects and new state and federal policy direction. As noted elsewhere, it is not appropriate for the EIR to attempt to define the overall level of need or to speculate on the level of development that must be accommodated.

■ **The Phased Build Alternative would result in a barrier to renewable generation, which would be inconsistent with California's renewable energy and climate change goals. (Brief pp. xvi, 53)**

- **RESPONSE:** At the time of the analysis, the California RPS was 33 percent, not 50 percent. Cluster 8 was not available when the EIR power flow analysis of the proposed WOD Upgrade Project was conducted. As noted in General Response GR-3, the EIR finds that the Phased Build Alternative would be supportive of achieving California's RPS goals.

■ **The first phase of the Phased Build Alternative will result in a significantly reduced amount of transfer capacity than the Proposed Project with only a small cost reduction. (Brief p. xvi)**

- **RESPONSE:** See General Response GR-4 and RTC F1-12. The need for future construction in the corridor after implementing the alternative is disputed. In addition, the voltage and location of new transmission facilities that may be needed in the WOD corridor is not now known; the assumption that the next "upgrade" after the Phased Build Alternative would be the Proposed Project is speculative.

■ **The Phased Build Alternative would be inconsistent with the Garamendi principles and Commission precedent on right-sizing transmission corridors. (Brief p. 53-54)**

- **RESPONSE:** See General Response GR-1. SCE's comment does not cite any CPUC "precedent on right-sizing transmission corridors." The term of "right-sizing" is one used in the California Energy Commission (CEC) 2015 Integrated Energy Policy Report, adopted by the CEC on February 10, 2016, which identifies a need for the state to develop a set of policies because currently there is no comprehensive definition for "right-sizing" transmission. Because the EIR does not attempt to define the overall level of need or speculate on the level of development that must be accommodated, the EIR analysis does not depend on whether "right-sizing" may or may not be a CPUC precedent.

Because the Phased Build Alternative would utilize existing transmission structures within SCE's existing ROW, the alternative would clearly be consistent with the Garamendi principles as follows. These principles: "(1) encourage the use of existing ROWs by upgrading existing transmission facilities where technically and economically justifiable; and (2) when construction of new transmission lines is required, encourage expansion of existing rights-of-way, when technically and economically feasible." (Senate Bill 2431 [Garamendi, Chapter 1457, Statutes of 1988]) Either the Proposed Project or the Phased Build Alternative would satisfy these principles.

■ **Certain mitigation measures are not feasible or necessary under CEQA. (Brief p. 66)**

- **RESPONSE:** See attached table and mitigation measure text for responses to individual mitigation measures and Final EIR text provided in Appendix A.

Responses to SCE Opening Brief, Appendix A (Mitigation Measures)

SCE in its Appendix A to the Opening Brief requested modifications to 12 mitigation measures. The CEQA Team agrees that minor changes would be beneficial in clarifying mitigation text for the following 6 measures:

- Biological Resources (Vegetation): MM VEG-1e
- Biological Resources (Wildlife): MM WIL-1c and WIL-2e
- Noise: MM N-1a and N-1b
- Water Resources: MM WR-2a

The changes to the measures listed above are presented in this Addendum in Section D.

No changes have been made to an additional 6 measures for which SCE suggested modifications:

- Biological Resources (Vegetation): MM VEG-1d, VEG-3a, VEG-4a
- Visual Resources: MM VR-4a, VR-8a, VR-9a

Each change requested by SCE is described in the table on the following pages, and the CEQA Team's response is presented next to it.

| EIR Team Responses to SCE’s Opening Brief, Appendix A (Mitigation Measures Requiring Modification) | | |
|--|---|---|
| SCE’s Request for Final EIR Modification | SCE Rationale | EIR Team Response |
| <p><u>SCE requests the following modifications be made to MM VEG-1d:</u> VEG-1d Restore or revegetate temporary disturbance areas. ... For all revegetation or restoration areas, if a fire, flood, or other disturbance beyond the control of SCE, CPUC, and BLM damages a revegetation area within the monitoring period, SCE shall not be responsible for a one-time replacement. If a second event occurs, a No replanting is required, unless the event is caused by SCE’s activity (based upon maintenance of erosion control measures; fencing, gates, or other site control; or investigation by a firefighting agency). ...⁶</p> | <p>In response to the DEIR, SCE submitted comments related to MM VEG-1d requesting modifications to a requirement that SCE be responsible for revegetation and/or restoration areas in the event of disturbances beyond SCE’s control. The original language was retained in the FEIR. The requirement is excessive and potentially adds significant costs to the project for impacts beyond the project’s control.</p> | <p><u>Final EIR Response to Comment:</u> RTCs F3-148 and F3-150 <u>EIR Team Response: No revisions made.</u> Project-related disturbance is expected to affect vegetation recovery from fire, flood, or other disturbances. Surrounding native vegetation is expected to recover more readily than vegetation in restoration areas. In most cases, the undisturbed native vegetation would have mature root systems and an intact soil seed bank, which facilitate post-disturbance recovery. By contrast, post-construction restoration areas lack established roots or seed banks and generally would not be able to recover to native habitat without additional restoration work. Please refer to RTC F3-148. As described in the FEIR, absent mitigation, project impacts to sensitive natural communities and habitat for special-status species would be significant. Mitigation Measure VEG-1d, including the one-time post-disturbance replacement, is feasible and necessary to mitigate for temporary project impacts to native vegetation, sensitive habitat, and lost habitat values for special-status plants and wildlife.</p> |
| <p><u>SCE requests the following modifications be made to MM VEG-1e:</u> VEG-1e Compensate for permanent habitat loss. SCE shall compensate for permanent or long-term habitat loss through off-site habitat acquisition and management or through participation in an approved in-lieu fee compensatory mitigation bank. ... Compensation will be provided for impacts to the following resources, at the ratios specified below (acres acquired and preserved to acres impacted). These ratios reflect multiple biological resource values, including habitat suitability for special-status species. <ul style="list-style-type: none"> ▪ Previously disturbed lands (agriculture, developed/disturbed) and open water: n/a (no habitat compensation required) ▪ Chaparral, desert scrub, and grassland/forbland <u>Coastal sage scrub</u>: 1:1 </p> | <p>In response to the DEIR, SCE submitted comments related to MM VEG-1e requesting edits to only require mitigation for sensitive vegetation communities and for those vegetation communities that provide suitable habitat or are occupied by special status wildlife species that are specifically as described in the EIR as needing mitigation. Specifically, SCE requested that certain references to Chaparral, Desert Scrub, and Aeolian sands be deleted as sensitive vegetation communities. These CPUC retained these references in the Final EIR, noting: “Chaparral and desert scrub have the potential to support, special status species, whether or not these habitats are known to be currently occupied or utilized by special- status species.” It is undisputed that Chaparral, Desert Scrub and Aeolian Sands, by themselves, do not constitute a sensitive vegetation community. Even assuming such habitats may provide habitat for sensitive wildlife species, the Final EIR is silent as to which special-status species these habitats allegedly support and why preservation of such habitat is required to mitigate significant impacts to those species.</p> | <p><u>Final EIR Response to Comment:</u> RTCs F3-127, F3-143, F3-150, and F3-151 <u>EIR Team Response: Revisions not made, except regarding California gnatcatcher critical habitat. See attached mitigation measure text for revised mitigation language.</u> As described in the FEIR, project impacts to habitat for special-status species would be significant. Tables Ap.7-1 and Ap.7-2 in Appendix 7 of the Final EIR lists the special-status species that have may occur in these habitats. The analysis in Sections D.4.3.3 and D.5.3.3 of the Final EIR describes project impacts to special-status species, the proposed mitigation, and how this mitigation would reduce project impacts to less than significant. To mitigate for permanent project impacts to native vegetation, sensitive habitat, and lost habitat values for special status plants and wildlife, Mitigation Measure VEG-1e would require compensation for permanent or long-term habitat loss. The EIR team has made the following conclusions regarding each of these vegetation or habitat types.</p> |

⁶ Note, SCE has presented only relevant portions of the mitigation measures and Final EIR text here for convenient review and reference

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| <ul style="list-style-type: none"> ▪ Alluvial scrub, coast live oak woodland, coastal sage scrub, and riparian woodland, and aeolian sand: 3:1 ▪ Coastal sage scrub within USFWS designated coastal California gnatcatcher critical habitat and coastal sage scrub outside of designated critical habitat that is occupied by California gnatcatcher: 3:1 <u>2:1</u> ▪ Coastal sage scrub outside of USFWS designated coastal California gnatcatcher critical habitat that is <u>suitable habitat</u> <u>but</u> not occupied by California gnatcatcher: 1:1 ... | <p>Categorization of these habitats as being sensitive, based on “the potential to support special status species” is excessive and would result in unnecessary costs to the project. Feasible mitigation has already been proposed for special status species which may be significantly impacted by the Proposed Project and the additional preservation of non-sensitive vegetation communities is not warranted.</p> <p>In addition, the newly introduced text in the FEIR requires a 3:1 mitigation ratio for Coastal sage scrub impacts within USFWS designated Critical Habitat. A 3:1 ratio exceeds the ratio recommended by the regulatory agency (USFWS) with direct jurisdictional oversight regarding this species (see USFWS’s Comments to BLM’s Draft WOD Biological Assessment (recommending 2:1 ratio); see also Sunrise Powerlink Project EIR, available at http://www.cpuc.ca.gov/environment/info/aspen/sunrise/feir/D02%20Biology.pdf (requiring a 2:1 ratio)). As such, a 3:1 ratio is excessive, is not supported by the analyses in the FEIR, and should be modified.</p> | <p><i>SCE’s suggested revisions pertain to grassland/forbland, chaparral, desert scrub, and aeolian sand. The EIR Team has made no revisions for the following reasons:</i></p> <ul style="list-style-type: none"> ▪ <u>Grassland/forbland</u>. Grassland/forbland habitats support, or may support, special-status species, including foraging raptors, burrowing owls, and the listed threatened Stephens’ kangaroo rat (SKR) (see Tables Ap.7-1 and Ap.7-2 in Appendix 7 of the Final EIR). Compensation would minimize, avoid, or offset the loss of special-status species habitat. Compensation for permanent habitat loss is feasible and necessary to reduce project-related impacts to less than significant. ▪ <u>Chaparral and desert scrub</u>. As explained in RTC F3-143, chaparral and desert scrub support, or may support, special-status species (see Tables Ap.7-1 and Ap.7-2 in Appendix 7 of the Final EIR). Compensation at the recommended ratios would minimize, avoid, or offset the loss of special-status species habitat. Compensation for permanent loss of these habitats is feasible and necessary to reduce project-related impacts to less than significant. ▪ <u>Aeolian sand</u>. As explained in RTC F3-127, stabilized and partially stabilized desert dune and sand fields are classified as G4/S3 by CDFW. As a G4/S3 habitat, aeolian sand is a sensitive natural community. Further, aeolian sand habitat in the Coachella Valley has suffered significant declines in recent decades and may support sand-endemic special-status plant and wildlife species. As listed and described in Tables Ap.7-1 and Ap.7-2 in Appendix 7 of the Final EIR, several special-status species may occur in aeolian sand habitat on the project site. <p><i>As a result of our discussion with USFWS regarding habitat for coastal California gnatcatcher, the EIR Team has adopted SCE’s requested revisions, because:</i></p> <ul style="list-style-type: none"> ▪ <u>Coastal sage scrub (CSS)</u>. CSS is generally of conservation concern because it is the habitat of a listed threatened bird, the coastal California gnatcatcher. Designated critical habitat for California gnatcatcher is found along the project right-of-way in San Bernardino County. The EIR Team has spoken with USFWS biologists regarding the appropriate compensation ratio for occupied habitat. The USFS has confirmed that appropriate compensation for loss of critical habitat for coastal California gnatcatcher is 2:1, so the ratio has been changed |

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| | | from 3:1 to 2:1 and the suggested text regarding “suitable habitat” has been added. |
| <p><u>SCE requests the following modifications be made to MM VEG-3a:</u></p> <p>VEG-3a Minimize impacts and ensure no net loss for jurisdictional waters and wetlands.</p> <p>No net wetlands loss and watercourse impacts minimization. SCE shall prepare an HMMP which will include restoration or compensation mitigation to assure no net loss of wetland acreage or wetland habitat value from direct or indirect project impacts, including reduction of wetland acreage, and downstream or upstream effects to channels or their associated habitat. The no net loss standard shall be reached through (1) ecological restoration <u>or revegetation</u> of temporarily disturbed areas to fully replace habitat extent and habitat value, and (2) compensation at a ratio of 1:1 to replace permanently impacted non-wetland jurisdictional areas, and at 3:1 to replace permanently impacted state or federally jurisdictional wetland areas at a mitigation ratio determined by the wetland/water permitting agencies during the 401/404 and 1602 permitting process. Restoration and compensation mitigation for impacts to jurisdictional waters shall conform to the requirements of Mitigation Measures VEG-1d (Restore or revegetate temporary disturbance areas) and VEG-1e (Compensate for permanent habitat loss). All wetlands and water-courses, whether intermittent or perennial, will be retained to the extent feasible, and appropriate setbacks or other means will be employed to prevent adverse impacts to surface waters or associated habitat values. The HMMP <u>will incorporate permit requirements and</u> shall be subject to review and approval by the CPUC and BLM. All restoration or compensation mitigation described in the HMMP shall be implemented in full. In the case of any conflict between the mitigation ratios or other requirements specified in wetland/water permits for the project and the mitigation ratios or other requirements specified in this mitigation measure, the higher mitigation ratios and more stringent requirements shall apply. This mitigation measure will be superseded by the requirements of water permits ...</p> | <p>In response to the DEIR, SCE submitted comments requesting edits to MM VEG-3a requesting modification to mitigation ratios. These edits were not incorporated into the FEIR but rather, additional text was added specifying that the higher of the mitigation ratios between the HMMP and FEIR should apply. The FEIR’s MM should defer to the HMMP and the applicable permit for wetland mitigation requirements established by the regulatory agency with direct jurisdictional oversight of jurisdictional waters and wetlands. Requiring in excess of the requirements of the relevant regulatory agency is excessive, not supported by the analyses in the FEIR, may subject the project to unnecessary costs and delays, and should be modified.</p> | <p><u>Final EIR Response to Comment:</u> RTC F3-159</p> <p><u>EIR Team Response: No changes incorporated - Two of SCE’s suggested changes were already incorporated into the Final EIR so these revisions are not necessary. Two of SCE’s new revisions have not been made.</u></p> <p>As explained in RTC F3-159, the compensation requirements would mitigate the project’s habitat impacts according to CEQA, without deferring the mitigation to future permitting actions by other agencies. Clarification in the FEIR ensures that the mitigation ratios would be applicable, even if they are not identical to the requirements of other permits. The mitigation ratios cited in Mitigation Measure VEG-3a are feasible and would reduce impacts to jurisdictional waters of the State or waters of the U.S. to less than significant.</p> <p>SCE requests the following four separate revisions to the text of Mitigation Measure VEG-3a:</p> <ul style="list-style-type: none"> ▪ The first requested revision to add wording to include revegetation as well as ecological restoration has already been incorporated into the Final EIR, so no revision is necessary. ▪ The second requested revision would substitute mitigation ratios yet to be determined for the ratios included in Mitigation Measure VEG-3a. As explained above, this revision would defer mitigation to future actions by other agencies. The EIR Team has made no revision. ▪ The third requested revision would require the Habitat Mitigation and Monitoring Plan (HMMP) to incorporate other applicable permit requirements. Incorporating wetland/water permit requirements into the HMMP was already included in the Final EIR, so no revision is necessary. ▪ The fourth requested revision would replace the FEIR text with a statement that the measure itself will be superseded by the requirements of water permits. As explained above, this revision would defer mitigation to future agency actions. The EIR Team has made no revision. |

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| <p><u>SCE requests the following modifications be made to MM VEG-4a:</u></p> <p>VEG-4a Minimize and mitigate impacts to special-status plants.</p> <p>Pre-construction survey. SCE shall conduct focused surveys for federal- and state-listed and other special-status plants. All special- status plant species ... impacted by project activities shall be documented in pre- construction survey reports. ... Prior to construction, SCE shall submit pre- construction field survey reports along with maps showing locations of survey areas and special-status plants to the CPUC and BLM for review and approval in consultation with CDFW and USFWS. If federally or state-listed plants would be affected, SCE shall notify BLM, USFWS, and CDFW to obtain the appropriate permits from CDFW and USFWS and comply with permit requirements. Additional conservation measures to protect or restore listed plant species or their habitat may be required by BLM, CDFW, or USFWS before impacts are authorized.</p> <p>Native cactus and Yucca. Most native cactus and shrubby Yucca species (Joshua tree and Mohave yucca) can be successfully salvaged and transplanted, and yuccas often provide an important vertical component to wildlife habitat. Therefore, native cactus (excluding chollas in the genus <i>Cylindropuntia</i>) and yuccas (excluding chaparral yucca, <i>Y. whipplei</i>), shall be avoided or salvaged according to the strategies described below...</p> | <p>In response to the DEIR, SCE submitted comments related to Biological Resources- Vegetation requesting that the <i>Native cactus and Yucca</i> section of MM VEG-4a be deleted based on the fact that: (1) not all native cactus and yucca species are considered sensitive; and (2) those that are considered sensitive would already be addressed under the immediately preceding</p> <p>Pre-construction survey section of MM VEG-4a.</p> <p>It is undisputed that not all native cactus and yucca species are sensitive. Even assuming such habitats may provide habitat (“vertical components”) for sensitive wildlife species, the Final EIR is silent as to which special- status species these habitats allegedly support and why preservation of such habitat is required to mitigate significant impacts to those species.</p> <p>Categorization of all native cactus and yucca as being sensitive is excessive and would result in unnecessary costs to the project. As described elsewhere in MM VEG-4a, feasible mitigation has already been proposed for special status species which may be significantly impacted by the Proposed Project and the additional preservation of non-sensitive vegetation communities is not warranted.</p> | <p><i>Final EIR Response to Comment:</i> RTC F3-162</p> <p><u>EIR Team Response: No revisions made.</u></p> <p>Absent mitigation, project impacts to habitat for special-status species would be significant (see Tables Ap.7-1 and Ap.7-2 in Appendix 7 of the Final EIR). Salvage and transplant of native cactus and yuccas are a component of mitigation for project related loss of wildlife habitat.</p> <p>Vertical habitat structure provided by cacti and yuccas is an important habitat component utilized by special status species in the project area, such as loggerhead shrike, Bendire’s thrasher, Le Conte’s thrasher, and raptors. The San Diego desert woodrat is also associated with cactus patches. Avoidance or salvage and transplant of cacti and yuccas is feasible mitigation that will help to reduce project related impacts to less than significant.</p> |

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| <p><u>SCE requests the following modifications be made to MM WIL-1c:</u></p> <p>WIL-1c Prepare and implement a Nesting Bird Management Plan.</p> <p>...</p> <p>The paragraphs below describe the NBMP requirements in further detail.</p> <p>Background. The NBMP shall include the following:</p> <p>...</p> <ul style="list-style-type: none"> ▪ A procedure for amendment of the NBMP, should there be changes in applicable state or federal regulations or as necessary for adaptive management upon approval by CDFW and USFWS. <p>...</p> | <p>SCE has worked with CPUC, BLM, CDFW and USFWS to form a Technical Working Group (TWG) to develop a Nesting Bird Management Plan to be used on the Proposed Project. The TWG produced NBMP is designed to be adaptive, not only for state or federal regulation changes, but also for other acceptable changes to the NBMP as may be determined to be acceptable upon consultation with the TWG.</p> <p>Consistent with the TWG's guidance, MM WIL-1c should be modified to allow changes to the NBMP for other factors, such as adjustments to the procedures or buffers, based on project experience and adaptive management policies.</p> | <p><i>Final EIR Response to Comment:</i> This comment was not made on the Draft EIR/EIS.</p> <p><u>EIR Team Response: Revision accepted, slightly reworded. See Addendum for revised mitigation language.</u></p> <p>The requested addition is consistent with the intent of the measure. However, approval of future amendments should require review and approval by all parties, including the CEQA and NEPA lead agencies. The mitigation measure has been revised to state this.</p> |

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| <p><u>SCE requests the following modifications be made to MM WIL-2e:</u></p> <p>WIL-2e Conduct surveys and avoidance for coastal California gnatcatcher. SCE shall conduct protocol level surveys for coastal California gnatcatchers (CAGN) in all areas of coastal sage scrub habitat that may be affected by the project, <u>unless SCE becomes a Participating Special Entity (PSE) under the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP) or Coachella Valley Multiple Species Habitat Conservation Plans (CVMSHCP), in which case the respective requirements for PSEs by the WR-MSHCP or CVMSHCP shall apply.</u> Survey areas will include a 500-foot buffer around project disturbance areas. Presence or absence of CAGN shall be determined prior to construction activities. In occupied CAGN habitat, SCE shall conduct additional focused nest location surveys to determine the locations of nests and territories. Survey areas shall include a 500-foot buffer around project disturbance areas.</p> <p>...</p> <p>Protocol or focused nest location surveys, as appropriate, shall be conducted within one year prior to the start of construction and shall continue annually until completion of construction and restoration activities, <u>unless SCE becomes a PSE under the WR-MSHCP or CVMSHCP, in which case the respective requirements for PSEs by the WR-MSHCP or CVMSHCP shall apply.</u></p> <p>If an active breeding territory or nest is confirmed, the CPUC, BLM, USFWS, and CDFW shall be notified immediately and the observation will be included in the daily monitoring report. All active nests shall be monitored on a weekly basis, <u>or as otherwise required by USFWS or for PSEs pursuant to WR-MSHCP or CVMSHCP participation,</u> until the nestlings fledge or the nest becomes inactive. SCE shall provide monitoring reports to the CPUC and BLM for review on a weekly basis.</p> <p>In coordination with the USFWS and CDFW, a 500-foot disturbance-free ground buffer and 1,000 500-foot vertical helicopter <u>disturbance-free</u> buffer shall be established around the active nest and demarcated by fencing or flagging. <u>These buffers may be adjusted in consultation with USFWS and CDFW based on type of work activity performed.</u> No</p> | <p>In response to the DEIR, SCE proposed text to WIL-2e to accommodate the implementation of requirements consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (WR- MSHCP) or Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP) if SCE applied for status as a Participating Special Entity (PSE). As written, the FEIR unnecessarily requires the implementation of WIL-2e throughout WR- MSHCP and CVMSHCP lands, regardless of SCE’s PSE status. Because participation in the WR-MSHCP or CVMSHCP would mitigate biological impacts in a manner at least equally effective as the other requirements of WIL-2e, the CPUC should permit SCE’s participation in the WR- MSHCP or CVMSHCP in lieu of compliance with the other terms of WIL-2e.</p> <p>Absent SCE’s edits, mitigation requirements may conflict and lead to requirements which significantly surpass levels necessary to reduce biological impacts to a less than significant level. Such requirements are not roughly proportional to the biological impacts resulting from the Proposed Project, not supported by the analyses in the FEIR, may subject the project to unnecessary costs and delays, and are not proper and should be modified.</p> | <p><u>Final EIR Response to Comment:</u> RTC F3-184</p> <p><u>EIR Team Response: The EIR Team accepts of 4 of SCE’s 7 suggested revisions, slightly reworded. See Addendum for revised mitigation language.</u></p> <ul style="list-style-type: none"> ▪ Mitigation Measure WIL 2e would mitigate impacts according to CEQA, by minimizing project effects to occupied coastal California gnatcatcher habitat and its nesting territories, without deferring the mitigation to future permitting actions by other agencies. The requested revisions defer mitigation to unidentified future conditions pertaining to SCE’s anticipated PSE status under the two MSHCPs. <p>The two MSHCPs were prepared to meet the requirements of the federal Endangered Species Act and California Natural Community Conservation Planning Act but are not congruent with requirements of CEQA. PSE status in the two MSHCPs does not replace or substitute for feasible mitigation identified in the Final EIR that would reduce impacts to less than significant.</p> <p>The field surveys, nest monitoring, and reporting contained in Mitigation Measure WIL-2e are feasible and, in combination with other mitigation, would reduce the project’s impacts to coastal California gnatcatcher to less than significant. <i>The EIR Team has made no revisions that would defer to future actions under the WR-MSHCP or CVMSHCP.</i></p> <ul style="list-style-type: none"> ▪ SCE requests a revision to decrease the helicopter buffer from 1000 feet to 500 feet, but has not provided information justifying a reduction of the helicopter buffer. Absent this information, it is unknown if the proposed 500-foot helicopter buffer would be sufficient to avoid disturbance impacts to California gnatcatcher. <i>The EIR Team has made no revision.</i> ▪ SCE requests revisions to allow for buffer adjustment based on type of work activities and in consultation with CDFW and USFWS, and allow vehicle traffic on existing paved public roads within nest buffers. This request is consistent with the adaptive management approach for the Nesting Bird Management Plan, discussed above under MM WIL-2e, and the <i>EIR Team supports the requested addition of “...disturbance-free...” and “These buffers may be adjusted in consultation with USFWS and CDFW based on type of work activity performed.” The EIR Team notes that future measures to minimize impacts to coastal California gnatcatcher must</i> |

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| <p>construction or vehicle traffic shall occur within nest buffers, except on existing paved public roads.</p> <p>If an active breeding territory or nest is confirmed within 500 feet of any project activity site, SCE shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting in the opinion of the authorized nesting bird monitor, construction within 500 feet will discontinue. If construction is to continue, shall prepare and implement a Wildlife Noise Monitoring Plan throughout construction and demolition activities taking place while CAGN occupy the nesting territory. Sound levels at the nest sites shall not exceed 8 dBA above ambient levels or 70 dBA (hourly average Leq), whichever is greater. Ambient levels will be established prior to initiation of construction and demolition, using the same methodology that will be used to take noise measurements during monitoring.</p> <p>...</p> <p>Construction activities shall avoid suitable occupied habitat for CAGN, to the extent feasible. If suitable-occupied habitat cannot be avoided, SCE shall consult with CDFW and USFWS to obtain appropriate take authorization, or permits, and/or PSE Status. SCE shall implement the conservation measures contained within these permits.</p> <p>...</p> | | <p><i>also conform to conditions imposed by the USFWS, CDFW, and either MSHCP, wherever applicable.</i></p> <ul style="list-style-type: none"> ▪ The revision to allow vehicle traffic on existing paved public roads within nest buffers has already been incorporated into the Final EIR <i>so no revision is necessary.</i> ▪ SCE requests a revision regarding noise monitoring for construction activities within 500 feet of a breeding territory or nest. This requested revision is consistent with the intent of the mitigation, provided that no-disturbance buffers are in place, as required by Mitigation Measure WIL-2e. <i>The EIR Team supports adding the requested text slightly reworded, “....the authorized nesting bird monitor shall monitor the nesting bird to evaluate impacts to the bird. If the construction, and associated noise, impacts nesting, in the opinion of the authorized nesting bird monitor, construction within 500 feet will immediately discontinue. If the authorized nesting bird monitor determines that construction may continue, SCE...”</i> ▪ SCE requests changing the requirements of Mitigation Measure WIL-2e to avoid occupied habitat, rather than suitable habitat, to the extent feasible. Suitable habitat is an important resource for California gnatcatcher. Occupancy of habitat may change from year to year; intact suitable habitat may not be currently occupied, but could be occupied by the species in the future. <i>The EIR Team has made no revision.</i> ▪ Finally, SCE requests addition of “and/or PSE status” as an option for obtaining any appropriate take authorization. The revision is consistent with the intent of the mitigation and the <i>EIR Team has added the text “...and/or Participating Special Entity (PSE) status.”</i> |

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| <p><i>SCE requests the following modifications be made to MM N-1a:</i></p> <p>N-1a Implement best management practices for construction noise. SCE shall employ the following noise-control techniques, at a minimum, to reduce construction noise exposure at noise sensitive receptors and to avoid possible violations of local rules, standards, and ordinances during construction:</p> <p>...</p> <ul style="list-style-type: none"> ▪ <u>If noise levels at the adjacent noise sensitive receptor location exceed applicable jurisdictional criteria,</u> stationary noise sources (e.g. generators, pumps) and at staging areas and on the ROW shall be shielded <u>at the source to the extent necessary to meet the jurisdictional noise levels, if feasible.</u> from adjacent noise sensitive receptors by an enclosure, temporary sound walls, or acoustic blankets. Where feasible, When utilized and if feasible, sound walls or acoustic blankets shall have a height of no less than 8 feet, a Sound Transmission Class (STC) of 27 or greater, and a surface with a solid face from top to bottom without any openings or cuts. <p>...</p> | <p>SCE’s suggested revisions to Mitigation Measure (MM) N-1a were not incorporated. The mitigation measure as presented in the FEIR lacks clarity regarding where the measure is applicable, may be interpreted to be applicable in areas where no significant impact has been identified, and is overly prescriptive in its methods for reducing noise impacts, thereby decreasing opportunities to implement other feasible options to satisfy the measure and decrease noise impacts (e.g. temporary relocation of residents, etc.)</p> | <p><i>Final EIR Response to Comment:</i> RTCs F1-2, F3-341 and F3-349</p> <p><u>EIR Team Response: Some revisions acceptable but not to the extent that SCE requests. See Addendum for revised mitigation language.</u></p> <p>The Final EIR in RTC F1-2 emphasized that the aim of MM N-1a is to ensure that “best management practices” will be followed. As in Comment F3-341, SCE’s current comment continues to imply that a significant impact may only occur and that noise sources should only be controlled at locations where noise levels “exceed applicable jurisdictional criteria.” This is incorrect. As stated in the title of Impact N-1 (Construction noise could substantially disturb sensitive receptors...), mitigation should apply at the locations where there is a potential to substantially disturb receptors, which are those within 1,400 feet of active construction (p. D.13-15 & intro to MM N-1a p. D.13-18 of the Final EIR).</p> <p>Also as in F3-341, SCE continues to reiterate a request to change the method of shielding to be “to the extent necessary . . . if feasible.” This request was rejected as not acceptable because CEQA requires a clear performance standard. The EIR continues to reject the request and retains the detail of performance specification in the Final EIR text.</p> |

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| <p><i>SCE requests the following modifications be made to MM N-1b:</i></p> <p>N-1b: Implement a helicopter noise control strategy. As part of the final Helicopter Use Plan, SCE shall include a helicopter noise control strategy that identifies the established helicopter flight corridors and minimum transit elevations above ground level to avoid noise- sensitive receptors on the ground. The noise control strategy shall prohibit helicopter hovering (<u>greater than 15 minutes</u>) within 250 feet <u>radial distance</u> of residences. <u>The noise control strategy should be applied to helicopter construction within the cities of Banning and Calimesa.</u></p> | <p>SCE’s suggested revisions to Mitigation Measure N-1b were not incorporated. As written, MM N-1b is infeasible to implement as SCE will need to utilize helicopters within 250 feet of residences, primarily for wire stringing activities. Further, MM N-1b’s preclusion of hovering would render use of helicopters in support of wire stringing to be infeasible since hovering would be required.</p> <p>In response to SCE’s comments regarding MM N-1b (p. 563 of the FEIR/response F-342), the CPUC alleges no change to this mitigation is necessary because MM N-1b purportedly does not preclude brief durations of operation within the distance of 250 feet. MM N-1b should be modified to ensure it is implementable as plainly written and to ensure such implementation is consistent with the CPUC’s clarification in the response to comments. An acceptable duration of helicopter hovering should be included to address concerns regarding construction feasibility.</p> <p>Additionally, under CEQA, mitigation measures must address significant impacts. As written, MM N-1b may be interpreted to be applicable in areas where no significant impact has been identified. Specifically, there are only two jurisdictions where the use of helicopters would potentially exceed local noise standards (the cities of Banning and Calimesa) and result in a significant impact. MM N-1b’s applicability should be limited to the jurisdictions where helicopter use would exceed local noise standards.</p> | <p><i>Final EIR Response to Comment:</i> RTCs F3-342 and F3-350</p> <p><u>EIR Team Response: Some revisions acceptable but not to the extent that SCE requests. See Addendum for revised mitigation language.</u></p> <p>As in Comment F3-342, SCE reiterates a request to define “hovering” in MM N-1b so that brief periods of operation less than 15 minutes should not be precluded, and this is acceptable as persistent hovering of up to 15 minutes was the basis for analysis (p. D.13-17).</p> <p>Also as in F3-342, SCE continues to reiterate a request to have the helicopter noise control strategy apply only in the jurisdictions of two cities with applicable standards. This request was rejected because the strategy should also apply in the locations where there is a potential to “substantially disturb receptors” as indicated in title of Impact N-1 and characterized as “annoyance” on p. D.13-16 of the Final EIR.</p> |
| <p><i>SCE requests MM VR-4a be deleted as it improperly defers environmental analysis, is infeasible, and the impacts MM VR-4a seeks to redress are already mitigated to the extent feasible via MMs VEG-1d, VR-2a, and VR-3a.</i></p> <p>VR-4a Minimize in-line views of retaining walls and land scars. Prior to final Project design, SCE shall prepare a map book and description detailing the preliminary design and location of all access and spur roads, retaining walls, and ground disturbance areas at the locations defined in Table D.18-14.</p> <p>The map book and description shall be submitted to the CPUC and BLM for field evaluation by the CPUC’s Visual Specialist and Designated Project Biologist. In these locations, the CPUC’s Visual Specialist or Environmental Monitor will evaluate all proposed access roads, spur roads, retaining</p> | <p>SCE requested deletion of Mitigation Measure VR-4a and identified concerns regarding the feasibility of implementing this measure.</p> <p>As a threshold matter, VR-4a improperly defers analysis of environmental impacts. While the FEIR narrowed the applicability of VR-4a to specific locations, the new list of affected project locations presented identifies over 200 project features, including removal features that are to be subsequently evaluated and may require redesign. The FEIR goes on to state “However, if structure installation, modification, or removal activities result in benign visual outcomes (lack of visual contrast), the mitigation described in Mitigation Measures VR-2a, VR-3a, and VR-4a would not be necessary.” As such, the measure improperly defers analysis of visual resource impacts to a post-approval stage.</p> | <p><i>Final EIR Responses to Comments:</i> RTC F1-3 and F1-24</p> <p><u>EIR Team Response: No revisions made.</u></p> <p>Impact VR-4 is defined as significant in the absence of mitigation (Class II). With application of Mitigation Measure VR-4a, the impact would be less than significant. See FEIR page D.18-61.</p> <p>SCE’s comment on the Draft EIR/EIS in Comment F1-3 also requested the elimination of Measure VR-4a and specifically asserted that:</p> <ul style="list-style-type: none"> • The spur road, retaining wall, and ground disturbance analysis of VR-4a needed to be done as part of the EIR/EIS and not done post approval; • Project information was available to conduct the VR-4a analyses during the EIR/EIS; |

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| <p>walls, and ground disturbance areas to assess in-line visibility of these Proposed Project features and characteristics from sensitive viewing locations. The analysis shall include consideration of viewing angles, screening, view duration, and other pertinent viewing characteristics. This analysis shall be subsequently provided to SCE for response and final design.</p> <p>In response, SCE shall develop design options to reduce the in-line visibility of these components, including alternative access and spur road routes, the use of “drive and crush” access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities. SCE’s redesign shall document the proposed resolution for each access road or other visible road feature and shall include the following:</p> <ul style="list-style-type: none"> • Approximate location, length, and design of alternative access or spur road routes that would replace proposed roads. • Vegetation that would be affected and steepness of terrain for consideration of vegetation and erosion impacts. • Areas where “drive and crush” access is a feasible measure to avoid access road scars (i.e., no grading or vegetation removal is required). SCE shall define frequency of driving, vehicle types to be used, and likelihood of vegetation recovery. ▪ The CPUC/BLM Visual Specialist and Designated Project Biologist shall evaluate whether the overall impacts of the alternate road designs are less than that of the original access road designs. | <p>Also, measure VR-4a did not identify specific options for minimizing in-line views of retaining walls and land scars as requested by SCE. Rather, the measure still asserts that SCE may be required to “develop design options” for review by an agency Visual Specialist for walls, roads, and other areas supporting potentially over 200 project features. Again, this improperly defers analysis and mitigation of impacts to a post-approval stage.</p> <p>In addition, VR-4a is infeasible. “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (CEQA Guidelines § 15364; see also CA. Pub. Re. Code § 21061.1 (similarly defining “feasible”). The measure is infeasible because:</p> <p>(1) Providing “design options” for potentially over 200 locations will require significant engineering and construction analysis which may not be accomplished in time to facilitate construction in support of project objectives and would result in an open-ended increase in costs;</p> <p>(2) Relocation of retaining walls and roads would likely result in the redesign of these features, as well as the towers they support which may not be accomplished in time to facilitate construction in support of project objectives and would result in an open-ended increase in costs;</p> <p>(3) Certain features may not be removable or subject to relocation making relocation of roads associated with these features infeasible for technological, social, and/or legal reasons;</p> <p>(4) SCE’s proposed project takes prudent and safe engineering design and construction planning into account along with consideration of potential visual impacts. VR-4a subjugates the interests of construction integrity and safety to the judgement of a visual specialist, potentially making this mitigation measure infeasible for technological and social grounds (including safety);</p> <p>(5) Environmental monitors typically do not have the training, skills, and/or experience to evaluate the visibility of project features from sensitive viewing locations and provide an analysis to which SCE may respond and adjust the final design, making this measure infeasible on technical grounds; and</p> | <ul style="list-style-type: none"> • Applying this mitigation across the entirety of the project would be onerous; • VR-4a needed to be applied only to specific occurrences and not the whole project; • Any required design changes could lead to further delays and uncertainty; and • Mitigation can only be required to reduce significant impacts. <p>The Final EIR response to this comment pointed out that the MM VR-4a implementation would be based on SCE’s final design in order to understand the full visual implications of project construction. SCE’s own comments on the Draft EIR/EIS noted the preliminary nature of the current design. However, in order to be responsive to SCE’s concern stated in the comments on the Draft EIR/EIS, a field analysis was conducted (for the Final EIR) in order to refine the scope of application for MMs VR-2a, VR-3a, and VR-4a. A table of structure locations that were identified as subject to MMs VR-2a, VR-3a, and VR-4a was provided in the Final EIR (Table D.18-11. Structure Locations Subject to Mitigation Measures VR-2a, VR-3a, and VR-4a).</p> <p>The Final EIR also pointed out that if structure installation, modification, or removal activities resulted in benign visual outcomes, the mitigation prescribed in MMs VR-2a, VR-3a, and VR-4a would not be required. Therefore, MM VR-4a was retained (but modified) in the Final EIR.</p> <p>In its Opening Brief, SCE continues to request the elimination of MM VR-4a, now asserting that VR-4a did not identify specific options for minimizing in-line views of retaining walls and land scars as requested by SCE. SCE further states that MM VR-4a is infeasible because: (1) the potential redesign of some features (spur roads, retaining walls, and/or land scars) could take time and be costly and would subjugate the interests of construction integrity and safety to the judgment of a visual specialist (potentially making this measure infeasible for technological and social grounds); and (2) environmental monitors typically do not have the training, skills, and/or experience to evaluate the visibility of project features from sensitive viewing locations and provide an analysis to which SCE may respond.</p> <p>The requested elimination of MM VR-4a is still not considered appropriate given the preliminary nature of SCE’s project design and the potential need to reduce the impacts of certain design</p> |

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| | <p>(6) VR-4a is incomplete and its successful implementation is questionable as it lacks a discussion of the mechanism or process by which SCE would document a “benign visual outcome” such that MM VR-2a, VR-3a, and VR-4a would not be required.</p> <p>The significant impacts sought to be redressed through MM VR-4a will already be mitigated to the extent feasible through other MMs. For example, MM VEG-1d requires SCE to restore or revegetate areas where vegetation and habitat are temporarily removed, mitigating the visual impacts of “ground disturbance areas” cited by VR-4a. MM VR-2a will also minimize “ground disturbance” and vegetation removal mitigating the visual impacts noted in VR-4a. Further, MM VR-3a will reduce color contrast of retaining walls, land scars, and graveled surfaces, thus mitigating the visual impacts from “access and spur roads, retaining walls, and ground disturbance areas” cited by VR-4a.</p> | <p>features. However, the geographic scope of the measure was substantially reduced because of the fieldwork that was done for the Final EIR. Further, the feasibility of MM VR-4a has been amply demonstrated through its successful implementation on previous CPUC projects (e.g., Sunrise Powerlink).</p> <p>As for SCE’s request to identify specific options for minimizing in-line views of retaining walls and land scars, the text of MM VR-4a already states: “...SCE shall develop design options to reduce the in-line visibility of these components, <u>including alternative access and spur road routes, the use of ‘drive and crush’ access, and redesign and placement of retaining walls to reduce the need for new roads and retaining walls and to reduce or eliminate the in-line visibility of these facilities.</u>”</p> |
| <p><u>SCE requests the following modifications be made to MM VR-8a:</u></p> <p>VR-8a: Minimize visual contrast in project design. For locations of the project identified in the FEIR as resulting in a significant visual impact, in the final design of approved project structures, SCE shall use design fundamentals that reduce the visual contrast of new structures and components to the characteristic landscape to the degree feasible. These include siting and location; reduction of visibility; repetition of form, line, color, and texture of the landscape; and reduction of unnecessary disturbance. SCE shall provide to the CPUC and BLM for review, a draft Project Design Plan describing the siting, placement, and other design considerations to be employed to minimize Proposed Project contrast for locations of the project identified in the FEIR as resulting in a significant visual impact. The draft plan must explain how the design will minimize visual intrusion and contrast by blending the earthwork, vegetation manipulation, and facilities with the landscape. Design strategies to address these fundamentals shall be based on the following factors.</p> <ul style="list-style-type: none"> ▪ Earthwork. Select locations and alignments that fit into the landforms to minimize the sizes of cuts and fills. ▪ Vegetation Manipulation. Use existing vegetation to screen graded areas and facilities from public viewing to the extent | <p>SCE requested deletion of MM VR-8a. The measure was not deleted in the FEIR and incorporated an additional requirement to provide copies of a project design plan as a courtesy to each jurisdiction that the project traverses.</p> <p>CEQA requires mitigation measures be proposed to mitigate significant impacts. The mitigation measure as written inappropriately applies to the entire project when there are only four discrete locations where the EIR identified significant visual impacts:</p> <ol style="list-style-type: none"> 1. Segment 4 for approximately 16 percent of the residences on the south side of the ROW between Palmer Avenue and Mockingbird Lane. 2. Segment 5 when viewed from residences on North Hathaway Street, North Allen Street, North Evans Street, and North Cherry Street in eastern Banning. 3. Segment 6 when viewed from several residences along the north sides of Amethyst Drive and Haugen-Lehmann Way in the central portion of the community of Whitewater. 4. The Subtransmission Line Route when viewed from the Cottage Lane residential subdivision on Iowa Street and Orange Avenue in the City of Redlands. <p>Further, as explained in SCE’s accompanying brief, the fourth location (Subtransmission Line Route), does not actually result</p> | <p><u>Final EIR Response to Comment:</u> RTCs F1-24 and F3-456</p> <p><u>EIR Team Response: No revisions made.</u></p> <p>Impact VR-8 varies in significance depending on location, and can be significant and unmitigable (Class I), less than significant (Class III), or beneficial (Class IV). In the FEIR, locations of impacts are identified in general by segment. Depending on final design and engineering, final impact locations and the class of the impact may vary; therefore Mitigation Measure VR-8a must apply to the entire project.</p> <p>SCE commented on this measure on the Draft EIR/EIS in Comment F1-24. In that comment, SCE requested the elimination of MM VR-8a asserting that, since CEQA only requires that mitigation be applied to reduce significant impacts (the majority of the project impacts would be less than significant), MM VR-8a should be limited to only those locations where impacts would be significant. SCE further asserted that since it would be applying design features intended to reduce visual effects, MM VR-8A was not needed.</p> <p>The Final EIR response to this comment pointed out that, for the areas where the impact is already less than significant, the project is also subject to NEPA and the mitigation measures should be consistent between the two documents. NEPA require the application of feasible mitigation even if an impact is less than</p> |

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| <p>feasible. Feather and thin the edges of cleared areas and retain a representative mix of plant species and sizes.</p> <p>▪ Reclamation and Restoration. Blend the disturbed areas into the characteristic landscape including access and spur roads and <u>for</u> disturbed areas created during construction (transmission line structure <u>work areas</u>, and construction yards and staging areas). Replace soil, brush, rocks, and natural debris over these disturbed areas. Newly introduced plant species shall be of a form, color, and texture that blend with the landscape.</p> <p>A draft Project Design Plan shall be submitted to CPUC and BLM at least 60 days prior to the start of construction. If the CPUC or BLM notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. Once the Plan is made final, SCE shall provide a copy as a courtesy to each jurisdiction through which the project passes <u>the jurisdictions where significant operational visual resource impacts have been identified</u>.</p> | <p>in a significant impact thus undergrounding of the 66 kV subtransmission line and further mitigation related to that particular location is not warranted.</p> <p>For the large majority of the Proposed Project’s 48 corridor miles, impacts to visual resources will be either beneficial or less than significant.</p> | <p>significant. Under CEQA, this measure would be optional for decision-makers’ consideration, because the measure would further reduce impacts.</p> <p>Furthermore, the response noted that the purpose of MM VR-8a is to prevent unintended outcomes, which could include visually prominent demarcations in vegetation, highly contrasting color of newly exposed soils and rock, and uncharacteristic terrain modifications, all of which could require time-consuming and costly remediation. Therefore, MM VR-8a was retained in the Final EIR.</p> <p>Now, SCE continues to maintain that mitigation should only be applied to significant impacts and, therefore, MM VR-8a should be restricted to those “...locations of the project identified in the FEIR as resulting in a significant visual impact,” and “...only to the degree feasible.” SCE also requests that MM VR-8a not be applied to access and spur roads and that the Project Design Plan be provided only to those jurisdictions where significant visual resource impacts have been identified.</p> <p>As previously noted in the response to SCE’s Comment F1-24, it is appropriate to apply MM VR-8a to the entirety of the project since, as the project is subject to NEPA, it should also require the application of feasible mitigation even if an impact is less than significant.</p> <p>Since there is the potential for unintended visual contrast to occur throughout the project extent, the purpose of MM VR-8a is to prevent such an unfortunate outcome. Therefore, <i>the EIR Team has retained MM VR-8a as is, including its application to access and spur roads.</i></p> |

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| <p><u>SCE requests the following modifications be made to MM VR-9a:</u></p> <p>VR-9a: Treat structure surfaces. <u>For locations of the project identified in the FEIR as resulting in a significant visual impact (Class I),</u> SCE shall treat the surfaces of all structures and new buildings visible to the public <u>within these locations to the degree feasible</u> such that: (a) their colors minimize visual contrast by blending with the characteristic landscape colors; <u>and</u> (b) their colors and finishes do not create excessive glare; and (c) their colors and finishes are consistent with local policies and ordinances. The transmission structures and conductors <u>within these locations</u> shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive. SCE shall consider the use of special galvanizing treatments or post-manufacture application of chemical treatments (such as Natina Steel) to ensure that transmission structures are sufficiently dulled and non-reflective and are of the appropriate color to blend effectively with the surrounding landscape. SCE shall comply with CPUC and BLM requirements regarding appropriate surface treatments for Proposed Project elements.</p> <p>SCE shall provide to the CPUC and BLM for review, a draft Surface Treatment Plan describing the application of colors and textures to all new facility structures, buildings, walls, fences, and components comprising all facilities to be constructed <u>within these locations</u>. The draft Surface Treatment Plan must explain how the design will reduce glare and minimize visual intrusion and contrast by blending the facilities with the landscape. The draft plan shall be submitted to CPUC and BLM at least 60 days prior to ordering the first structures that are to be color- treated during manufacture or prior to construction of any of the facility components, whichever comes first. <u>The CPUC and BLM shall notify SCE of any questions or needed revisions to the Surface Treatment Plan within 30 days of their receipt of the Plan. If at the end of 30 days no questions or needed revisions to the Surface Treatment Plan are presented to SCE by either the CPUC or BLM, the Plan shall be deemed accepted.</u> If the BLM or CPUC notifies SCE that revisions to the plan are needed before the plan can be approved, within 30 days of receiving that notification, SCE shall prepare and submit for review and approval a revised plan. The draft</p> | <p>In response to the DEIR, SCE requested deletion of MM VR-9a. The measure was not deleted in the FEIR.</p> <p>As explained in SCE’s objections to MM VR-8a above, CEQA requires mitigation measures be proposed to mitigate significant impacts. The mitigation measure as written applies to the entire project when there are only four discrete locations where the EIR identified there would be significant operational visual impacts. Additionally, as also explained above, SCE does not concur that the fourth location identified would result in a significant impact.</p> <p>Furthermore, as noted in SCE’s comments to the DEIR/DEIS, the PEA explains that new structures and conductors would weather to a dull gray finish ultimately resulting in compliance with this measure, therefore there is no need for the measure to dictate the use of chemical treatments such as Natina. Tower colors are expected to be consistent with the existing visual condition and thus the prescription of specific tower and conductor colors is unwarranted.</p> <p>Lastly, MM VR-9a precludes SCE from ordering materials until the CPUC and BLM have approved a Surface Treatment Plan. As such, this measure is potentially infeasible and inconsistent with the successful accomplishment of the Proposed Project objectives as it may delay the procurement of project materials (including tower steel) for an indefinite amount of time.</p> | <p><u>Final EIR Responses to Comments:</u> RTCs F1-24, F3-443, and F3-457</p> <p><u>EIR Team Response: No revisions made.</u></p> <p>Impact VR-9 varies in significance depending on location, and can be significant but reduced to less than significant through mitigation (Class II) or less than significant (Class III).</p> <p>SCE commented on this measure on its comments on the Draft EIR/EIS in Comment F1-24. In that comment, SCE requested the elimination of MM VR-9a asserting that, since CEQA only requires that mitigation be applied to reduce significant impacts (the majority of the project impacts would be less than significant), MM VR-9a should be limited to only those locations where impacts would be significant. SCE further asserted that since it would be applying design features intended to reduce visual effects, MM VR-9A was not needed.</p> <p>The Final EIR response to this comment pointed out that as the project is also subject to NEPA and the mitigation measures should be consistent between the two documents. NEPA require the application of feasible mitigation even if an impact is less than significant. Under CEQA, this measure’s implementation for less than significant impacts would be optional for decision-makers’ consideration, because the measure would further reduce impacts.</p> <p>Furthermore, the response noted that the purpose of MM VR-9a is to prevent unintended outcomes (such as the use of highly specular [shiny] steel that has been insufficiently dulled in the galvanizing process) that require time-consuming and costly remediation.</p> <p>SCE continues to maintain that CEQA mitigation should only be applied to significant impacts and, therefore, MM VR-9a should be restricted to those “...locations of the project identified in the FEIR as resulting in a significant visual impact,” and “...only to the degree feasible.” SCE also requests that MM VR-9a not be applied to access and spur roads. Importantly, SCE requests that the reference to the use of special galvanizing treatments or post-manufacture applications of chemical treatment (to improve dulling, reduce reflectivity, better blend the project with the surrounding landscape, and reduce visual contrast) be eliminated, which is the fundamental corrective action and purpose of MM VR-9a.</p> |

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| <p>Surface Treatment Plan shall include the following components and specifications.</p> <ul style="list-style-type: none"> ▪ Specification, and 11” x 17” color simulations at life-size scale, of the treatment proposed for use on structures, including structures treated during manufacture. ▪ A list of each major structure, building, tower and/or pole, and fencing specifying the color(s) and finish(es) proposed for each (colors must be identified by name and by vendor brand or a universal designation). ▪ Two sets of brochures and/or color chips for each proposed color. ▪ A detailed schedule for completion of the treatment. ▪ A procedure to ensure proper treatment maintenance for the life of the Proposed Project. ▪ Until SCE receives notification of approval of the Surface Treatment Plan by the CPUC and BLM, SCE shall not specify to the vendors the treatment of any buildings or structures for manufacture and shall not perform the final treatment on any buildings or structures treated on site as noted above and within the affected locations. Additionally, construction activities shall not start until approval of the plan from the CPUC and BLM has been received. Within 14 days following the completion of treatment on any facility component, SCE shall notify the CPUC and BLM that the component (e.g., structure or building) is ready for inspection. | | <p>It is appropriate to apply MM VR-9a to the entirety of the project since the project is subject to both CEQA and NEPA, and NEPA does require the application of feasible mitigation even if an impact is less than significant. Since there is the potential for unintended visual contrast to occur throughout the project extent, the purpose of MM VR-9a is to prevent such an unfortunate outcome. The requested changes to MM VR-9a would, in effect, eliminate any possible effectiveness of the measure. Therefore, <i>it is appropriate to retain MM VR-9a, as is, including its application to access and spur roads.</i></p> |
| <p><u>SCE requests the following modifications be made to MM WR-2a:</u></p> <p>WR-2a: Implement an Erosion Control Plan and demonstrate compliance with water quality permits. SCE shall develop and submit an Erosion Control Plan to the CPUC and BLM for approval at least 60 days prior to construction.</p> <ul style="list-style-type: none"> ▪ If soil cement is proposed, the specific locations must be defined in the Plan, and evidence of approval by the Regional Water Quality Control Board appropriate jurisdiction shall be submitted to the CPUC and BLM prior to its use. ▪ Proposed schedule for inspection of erosion control/SWPPP measures and schedule for corrective actions/repairs, if required. Erosion control/SWPPP inspection reports shall be provided to the CPUC-EM. | <p>SCE’s suggested revisions to MM WR-2a were not incorporated and, as currently written, the FEIR requires the CPUC and BLM review and approve the Erosion Control Plan. The Erosion Control Plan will be incorporated into the Storm Water Pollution Prevention Plan (SWPPP), which will be written and implemented in compliance with the applicable Federal and California Construction General Permits for Storm Water and approved by the State Water Resources Control Board (SWRCB).</p> <p>The requirement for an additional agency review by the BLM and CPUC is not warranted as review and approval of the Erosion Control Plan is conducted by the SWRCB. Additional review is not required, may spawn conflicting requests, and may ultimately result in unnecessary delays and costs to the project and SCE’s customers.</p> | <p><u>Final EIR Response to Comment:</u> RTC F3-462</p> <p><u>EIR Team Response: The EIR Team accepts 2 of SCE’s 3 suggested revisions. See Addendum for revised mitigation language.</u></p> <ul style="list-style-type: none"> ▪ 1st Paragraph Revision - SCE’s comments on the Draft EIR/EIS requested elimination of the requirement to submit the plan for approval 60 days prior to construction. No reason was offered for why the proposed changes should be made. Therefore, the EIR Team believed that 60 days is adequate time necessary for the CPUC and BLM review and approval. The requirement to submit the plan “for approval at least 60 days prior to construction” remained in the Final EIR (see Response to Comment F3-462). |

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| ... | <p>The SWPPP will be kept onsite and will be readily available on request. Providing the CPUC EM with copies of ECP/SWPPP inspection reports is therefore duplicative and unnecessary.</p> <p>Lastly, soil cement usage would not be approved by the Regional Water Quality Control Board but rather by the local jurisdiction via any required grading permit. Language has been revised to address this.</p> | <p>Now SCE requests that only the “for approval” component be deleted. Because the CPUC and BLM would receive the Plan at least 60 days prior to its use, and because the SWRCB will approve the Erosion Control Plan as part of the SWPPP in compliance with the Construction General Permits, removal of this portion of the text is acceptable and there would be no impact to the intent and strength of the mitigation measure.</p> <ul style="list-style-type: none"> ▪ 2nd Paragraph Revision - SCE’s comments on the Draft EIR/EIS (RTC F3-462) requested removal of the entire approval requirement by the RWQCB, and did not suggest alternative approval by an “appropriate jurisdiction” for the use of soil cement prior to its use. Additionally, no reason was offered for why the proposed change should be made. <p>In this case, because approval would still be required by an “appropriate jurisdiction,” which could be the RWQCB or a local jurisdiction, the suggested revision is acceptable and there would be no change to the requirements of Mitigation Measure WR-2a.</p> <ul style="list-style-type: none"> ▪ 3rd Paragraph Revision - SCE’s comments on the Draft EIR/EIS (RTC F3-462) requested that erosion control/SWPPP inspection reports be kept in the SWPPP and made available upon request. However, no reason was offered for why the proposed change should have been made. Therefore, the provision requiring submission of inspection reports to the CPUC EM remained in the Final EIR. <p>Now SCE is requesting deletion of the entire requirement. The CPUC EMs review the inspection reports on a daily basis to see what deficiencies have been identified and verify that these issues are fixed in the required timeframe. In addition, the SWPPP inspection reports are useful in helping to identify problematic areas. The CPUC EMs also get weather or storm event information from these reports. Furthermore, SWPPPs can be difficult to track down in the field, especially along linear projects, to find the inspection reports since there is only one Master SWPPP copy, which holds all of the inspection reports. Therefore, the EIR Team believes that the requirement for submittal of the inspection reports to the CPUC EM should remain in MM WR-2a. Note that SCE could provide the reports to the CPUC EM by making them available on the SCE Field</p> |

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| | | Resource Environmental Database (FRED). No revision has been made. |
| SCE Requested Changes to Final EIR Text | | |
| <p><u>SCE requests the following modifications be made at pages D.4-3 – D.4.4 of the Final EIR:</u></p> <p>Final EIR, Biological Resources- Vegetation, Section D.4.1.1 at pgs. D.4-3 – D.4.4:</p> <p>“...One sensitive forbland community is found on the route. The <i>Amsinckia</i> Herbaceous Alliance (Fiddleneck Fields) is a seasonal community dominated by rancher’s fiddleneck (<i>Amsinckia intermedia</i>) and numerous native and naturalized annual and perennial forbs and grasses. This alliance occupies upland slopes and valleys, and fallow fields with well- drained loamy soils. The <i>Amsinckia</i> Herbaceous Alliance has a Global and State Rarity ranking of G4/S4 (Sawyer et al., 2009), meaning that the community is at fairly low risk of extinction or elimination due to an extensive range or many populations or occurrences, but with possible cause for concern as a result of local recent declines, threats, or other factors. This community is found in one small area in the San Timotee Badlands along Segment 3, near Mile Point (MP) 7.0.</p> <p>The G4/S4 rating does not automatically indicate an imperiled sensitive community. However, given the very limited distribution of this vegetation community in the project area and proximity of developed areas to this occurrence, the characterization of <i>Amsinckia</i> Herbaceous Alliance as a locally sensitive vegetation community within the project area is warranted.</p> <p>...</p> | <p>In response to the Draft EIR, relative to Biological Resources- Vegetation discussion related to <i>Amsinckia</i> Herbaceous Alliance (Fiddleneck Fields), SCE requested removal of certain language characterizing this community as sensitive. The CPUC retained this language in the FEIR, noting “G4/S4 rating does not automatically indicate an imperiled sensitive community. However, given the very limited distribution of this vegetation community in the project area and proximity of developed areas to this occurrence, the characterization of <i>Amsinckia</i> Herbaceous Alliance as a locally sensitive vegetation community within the project area is warranted.”</p> <p>The guidance from the California Department of Fish and Game is clearly determinative of resources and potentially significant impacts. The Global (G) and State (S) Rarity Raking of G4/S4 of is not high enough to characterize this native plant community as sensitive, thereby qualifying it for mitigation, if impacted, based on CDFW’s <i>List of Natural Communities for the State</i>. Communities with The Global (G)/State (S) Rarity Ranking numbers of G3/S3 or less than require consideration under the CEQA Guidelines Checklist, per CDFW (see CA. Dep’t of Fish & Game website, at http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_background.asp.)</p> <p>The CPUC’s analysis does not demonstrate a significant impact to this species, which is a legal prerequisite for the assignment of mitigation under CEQA. As such, any additional project costs and time complying with such mitigation is not warranted.</p> | <p><u>Final EIR Response to Comment:</u> RTC F3-125</p> <p><u>EIR Team Response: No revisions made.</u></p> <p>The ratings assigned by CDFW consider the status of the vegetation community in the state as a whole and an analysis of impacts needs to consider local conditions. Given the very limited distribution of this vegetation community in the project area and proximity of developed areas to this occurrence, the characterization of <i>Amsinckia</i> Herbaceous Alliance as a locally sensitive vegetation community within the project area is warranted.</p> <p>Although this vegetation community appears to be a locally sensitive vegetation community in the project area, project-related impacts to this particular community are not expected to be significant, and no mitigation is proposed, beyond those for grassland/forbland in general (i.e., restoration or revegetation for temporary impacts and compensation for permanent impacts to grassland/forbland that potentially supports Stephens’ kangaroo rat, or grassland/forbland with 10 percent or greater relative cover of native perennial grasses).</p> |

| EIR Team Responses to SCE’s Opening Brief, Appendix A (Mitigation Measures Requiring Modification) | | |
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| SCE’s Request for Final EIR Modification | SCE Rationale | EIR Team Response |
| <p><u>SCE requests the following modifications be made at page D.4-31 of the Final EIR:</u></p> <p>Final EIR, Biological Resources- Vegetation, Section D.4.3.3 at pg. D.4-31:</p> <p>“ ...</p> <p>The Proposed Project also would affect wetland or riparian habitat, vegetation and habitat that may support special-status plants or animals, and vegetation types designated by CDFW (CDFG, 2010) as "communities with highest inventory priority." These habitats include alluvial scrub, coast live oak woodland, coastal sage scrub, chaparral, desert scrub, riparian woodland, aeolian sand, and grassland/forbland potentially supporting Stephens’ kangaroo rat, or native grasslands (i.e., grassland/forbland with 10 percent or greater relative cover of native perennial grasses).</p> <p>...”</p> | <p>In response to the DEIR, SCE submitted comments related to Biological Resources- Vegetation requesting that certain references to Chaparral, Desert Scrub, and Aeolian sands be deleted as sensitive vegetation communities. These CPUC retained these references in the Final EIR, noting: “Chaparral and desert scrub have the potential to support, special status species, whether or not these habitats are known to be currently occupied or utilized by special- status species.”</p> <p>It is undisputed that Chaparral, Desert Scrub and Aeolian Sands, by themselves, do not constitute a sensitive vegetation community. Even assuming such habitats may provide habitat for sensitive wildlife species, the Final EIR is silent as to which special-status species these habitats allegedly support and why preservation of such habitat is required to mitigate significant impacts to those species.</p> <p>Categorization of these habitats as being sensitive, based on “the potential to support special status species” is excessive and would result in unnecessary costs to the project. Feasible mitigation has already been proposed for special status species which may be significantly impacted by the Proposed Project and the additional preservation of non-sensitive vegetation communities is not warranted.</p> | <p><u>Final EIR Responses to Comments:</u> RTC F3-127 and F3-143</p> <p><u>EIR Team Response: No revisions made.</u></p> <p>As described in the Final EIR, absent mitigation, project impacts to habitat for special-status species would be significant. Please see Tables Ap.7-1 and Ap.7-2 in Appendix 7 of the Final EIR.</p> <p>The analysis in Sections D.4.3.3 and D.5.3.3 of the Final EIR describes project impacts to special-status species, the proposed mitigation, and how this mitigation would reduce project impacts to less than significant. Please refer to the EIR Team’s response regarding SCE’s requested revisions to Mitigation Measure VEG-1e.</p> <p>All three of the natural community typed named in this request are either sensitive communities (aeolian sand) or may support special-status species.</p> |
| <p><u>SCE requests the following modifications be made at page D.19-14 of the Final EIR:</u></p> <p>Final EIR, Water Resources and Hydrology, Section D.19.2.1 at pg. D.19-14:</p> <p>“D.19.2.1 Federal Clean Water Act</p> <p>...</p> <p>The General Permit requires that the SWPPP include a description of post-construction BMPs, and a maintenance schedule. An effective stormwater management strategy must address the full suite of storm events including water quality, and channel protection, overbank flood protection, and extreme flood protection.</p> <p>...</p> | <p>In response to the DEIR, SCE provided comments related to stormwater protection which were not incorporated into the FEIR.</p> <p>CEQA requires mitigation measures be proposed to mitigate significant impacts. The requirement that “overbank flood protection” and “extreme flood protection” be incorporated into the Proposed Project’s stormwater management strategy is not required. Any flood risks identified by the Final EIR were mitigated to less than significant levels through MM WR-3a (see Final EIR at D.19-31 (“Mitigation Measure WR-3a (Implement flood, erosion, and scour protection for aboveground and belowground improvements) would reduce the impact to a less than significant with mitigation level by providing erosion and scour protection of project features (Class II)”). Furthermore, reference to overbank and extreme flood protection is not necessary as California’s Construction General Plan (CGP) states that such flood protection events are traditionally dealt with in local drainage and flood protection ordinances.</p> | <p><u>Final EIR Response to Comment:</u> RTC A1-1</p> <p><u>EIR Team Response: Retain Final EIR language and add additional clarification text. See Addendum for revised language.</u></p> <p>Section D.19.2.1 (Applicable Regulations, Plans, and Standards, Federal) discusses the Clean Water Act regulations relevant to hydrology and water resources. The mitigation measures recommended in Section D.19.3 of the Final EIR, such as MM WR-3a, are requirements specific to the Project to reduce potentially significant flood risk impacts. The EIR Team agrees that “overbank flood protection” and “extreme flood protection” are not required to be incorporated into the Proposed Project’s stormwater management strategy.</p> <p>SCE’s referenced text was added to the Final EIR in response to comments on the Draft EIR/EIS by the San Bernardino County Department of Public Works. Specifically, Comment A1-1 requested identification of the Construction General Permit’s</p> |

| EIR Team Responses to SCE's Opening Brief, Appendix A (Mitigation Measures Requiring Modification) | | |
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| SCE's Request for Final EIR Modification | SCE Rationale | EIR Team Response |
| | | <p>requirements for permanent post-construction Best Management Practices (BMPs).</p> <p>The discussion added to the Final EIR was incorporated directly from the "Post-Construction Requirements" section of the State Water Resources Control Board's <i>Construction General Permit Fact Sheet</i>, which can be accessed at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_complete.pdf.</p> <p>The Fact Sheet corroborates SCE's statement that overbank flood protection and extreme flood protection events are traditionally dealt with in local drainage and flood protection ordinances. However, the Fact Sheet also states that measures in the General Permit to address water quality and channel protection reduce overbank and extreme flooding impacts.</p> <p><i>The EIR Team has retained the Final EIR language in Section D.19.2.1, which is intended to define the full suite of storm events as described by the SWRCB. However, the EIR Team has added two sentences, clarifying overbank and extreme flood protection in response to SCE's concerns (see Addendum).</i></p> |

| EIR Team Responses to SCE’s Opening Brief, Appendix A (Mitigation Measures Requiring Modification) | | |
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| SCE’s Request for Final EIR Modification | SCE Rationale | EIR Team Response |
| <p><i>SCE requests the following modifications be made at page H-6 of the Final EIR:</i></p> <p>Final EIR, Mitigation Monitoring and Reporting, Section H.5.2 at pg. H-6:</p> <p>“H.5.2 Construction Personnel</p> <p>...</p> <p>To ensure success, the following actions, detailed in specific mitigation measures included in the MMCRP, would be taken:</p> <ul style="list-style-type: none"> ▪ Procedures to be followed by construction companies engaged to do the work would be written into their contracts with SCE. Procedures to be followed by construction crews would be written into an agreement that all construction personnel would be asked to sign, denoting consent to the procedures. <p>...”</p> | <p>SCE’s suggested revisions to language in the Mitigation Monitoring and Reporting section of the DEIR which requires construction personnel to personally sign certain agreements. These edits were not incorporated into the FEIR.</p> <p>Such a requirement is redundant and unnecessary given standard contractual obligations obligating both SCE and contractor personnel to comply with applicable employment policies, including all project MMs. Further, FEIR MM VEG- 1b requires Worker Environmental Awareness Program (WEAP) training for construction personnel. WEAP training protocols require sign-in sheets and hardhat stickers to facilitate field verification of training certification. Additionally, environmental information (including discussion of applicable MMs) is provided at construction tailboards and at construction meetings. Construction practices are also monitored by both SCE and regulatory agencies to ensure that MMs are complied with. Requiring the additional step of having construction personnel execute agreements overly burdensome and not needed to ensure compliance with MMs.</p> <p>Lastly, such a requirement may not be infeasible as many contractors do not allow their personnel to sign individual agreements in support of work they do for their employers. Such a requirement potentially creates questions regarding proper parties in litigation disputes, may conflict with insurance policies, including coverage provided by errors and omissions policies, and may conflict with other employment agreements which limit circumstances under which those employees are permitted to speak for and contractually bind their employers.</p> | <p><i>Final EIR Response to Comment:</i> RTC F3-572</p> <p><i>EIR Team Response: Deletion of text acceptable.</i></p> <p>The Final EIR responds to a similar comment from SCE in Response to Comment F3-572, which states that “a signed agreement by construction subcontractors to adhere to procedures, including APMs and mitigation measures, is an important step to confirm that the specific requirements are not only known, but will be followed to ensure the protection of resources.”</p> <p>The objective is to ensure that the construction personnel, not just the companies, know and agree to the construction procedures. Already all crew members, from supervisors to traffic flagman will be required to attend WEAP training prior to working on the project, which is a mitigation requirement. Thus, the EIR Team agrees that asking everyone working on the project to sign an additional agreement indicating they understand and consent to the procedures may be unrealistic. Section H.5.2 (Construction Personnel) of the Final EIR opens by stating that the agreement requirements are “detailed in specific mitigation measures included in the MMCRP.”</p> <p>Furthermore, in response to SCE’s comments on the Draft EIR/EIS, the word “separate” was removed from the text in Section H.5.2 (Construction Personnel) of the Final EIR, because this agreement does not necessary have to be an additional requirement between the construction contractor and SCE. The intent of the revised language in the Final EIR was to indicate that documentation of training, such as that required in Mitigation Measure VEG-1b (Prepare and implement a Worker Environmental Awareness Program [WEAP]), among others, could satisfy this agreement. For instance, the construction crews on the Tehachapi Renewables Transmission Project sign a sheet acknowledging they have attended the WEAP training.</p> <p>Because the signed agreement is not intended to be an additional obligation outside of what is required by mitigation, <i>the EIR Team has deleted the language requested by SCE since it would not change the intent or strength of any construction requirements or mitigation.</i></p> |

Responses to SCE Opening Brief, Appendix B (Phased Build Alternative)

SCE stated, “In the event that SCE is ordered to construct the Phased Build Alternative there are a number of concerns SCE has identified with the FEIR that SCE respectfully requests be resolved in the Project Decision in order to reduce further delay in coordinating the implementation of construction with the CPUC’s Energy Division, as well as minimize the potential need for a Petition for Modification.” This table presents SCE’s requests in the first two columns, and the EIR Team’s response in the third column.

| SCE Appendix B: Phased Build Alternative | | |
|---|---|--|
| SCE Issue | SCE Request | EIR Team Response |
| <p><u>[ITEM 1] Subtransmission (66 kV) and Distribution (12 kV) lines Relocation in Segment 1</u></p> <p>SCE identified in the PEA (Section 3.1.2.6 and 3.1.3) that the 66 kV subtransmission and 12 kV distribution lines currently located within Segment 1 would need to be relocated in order to accommodate installation of the new 220 kV transmission infrastructure.</p> <p>The FEIR incorrectly assumes that the Phased Build Alternative would not require SCE to perform this work under the assumption that there is sufficient space to string the new conductor on the existing 220 kV structures within Segment 1.</p> <p>The 66 kV subtransmission and 12 kV distribution lines relocation will be required for the Phased Build Alternative because there is inadequate clearance to install new conductor or modify existing structures for new loading requirements without double or possibly triple line outage.</p> <p>The 66 kV subtransmission and 12 kV distribution lines relocations and installation of temporary shoo-fly structures in Segment 1 are required for either the Phased Build Alternative or SCE Proposed Project.</p> | <p><u>SCE requests the relocation of the Subtransmission (66 kV) and Distribution (12 kV) be acknowledged</u></p> <p>The final Project Decision should acknowledge the full scope of the required work for the 66 kV subtransmission lines, 12 kV distribution lines and shoo-fly’s in Segment 1. The Project Decision should also determine that sufficient analysis and disclosure of this scope of work has been presented within SCE comments on the DEIR/DEIS, testimony in the administrative record, and Final Environmental Impact Report.</p> | <p>SCE reiterates that conductor stringing in Segment 1 would require relocation of 66 kV and 12 kV facilities (see RTC F1-18 and F3-5). While the Final EIR found these circuits could be retained in place and unmodified, this additional information more clearly defines the potential need for “double or possibly triple line” outages.</p> <p>Based on SCE’s additional information on the uncertainty of obtaining simultaneous outages in Segment 1, it is now apparent that relocation of the lower-voltage (66 kV and 12 kV) facilities in Segment 1 may become necessary. While it is uncertain whether this ultimately would be required, this Addendum acknowledges that the impacts of the 66 kV relocation and the Iowa Street Underground Alternative may occur if the Phased Build Alternative is approved. The description of the Phased Build Alternative has also been expanded to clarify this.</p> <p>No additional impact analysis is required, even if the relocation becomes necessary, because the impacts of the relocation are included with the Proposed Project analysis in the Final EIR impact analyses. There is only one significant impact associated with the 66 kV relocation, and it would be eliminated with the Iowa Street Underground Alternative.</p> |

| SCE Appendix B: Phased Build Alternative | | |
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| SCE Issue | SCE Request | EIR Team Response |
| <p><u>[ITEM 2] Conflicts between the project description for the Phased Build Alternative and the scope of work for the Tower Relocation Alternative</u></p> <p>Table AP. 5-1 of the FEIR generally requires that sets/pairs of 220 kV transmission structures be moved north from SCE’s Proposed Project locations within designated areas of Segments 4, 5 and 6 in the existing right of way.</p> <p>The Phased Build Alternative as described in the FEIR generally requires that existing 220 kV double circuit structures remain in their current location for reuse and only identifies that 30% of those structures would require modification.</p> <p>The Tower Relocation Alternative would require installation of new double circuit structures therefore <u>eliminating the re- use of approximately 26 existing double circuit towers</u> which presumably were required to be re-used under the Phased Build Alternative.</p> | <p><u>SCE requests the Project Decision reconcile the scope of work needed to construct the Tower Relocation Alternative as part of the Phased Build Alternative</u></p> <p>The final Project Decision should reconcile the conflict with the description of the Phased Build Alternative and the Tower Relocation Alternative by clarifying construction of <u>new sets/pairs</u> of 220 kV transmission structures as explained in the Tower Relocation Alternative is intended and not the reuse of the existing double circuit 220 kV structures. Specifically, the Project Decision should recognize that approximately 26 of the existing double circuit structures that would be replaced in Segments 4, 5 and 6 under this combined alternative would be required, in addition to the 30% that would require modification in other locations of the existing right of way. The Project Decision should also determine that sufficient analysis and disclosure of this scope of work has been presented within SCE comments on the DEIR/DEIS, testimony in the administrative record, and Final Environmental Impact Report.</p> | <p>SCE is incorrect in its understanding. The Phased Build Alternative would allow retention of most existing double-circuit towers, including those that are included in the Tower Relocation Alternative. The Draft and Final EIR consistently stated that the Phased Build Alternative would ensure that the intent of the Tower Relocation Alternative was incorporated into the Phased Build Alternative. In all cases, the centerline of the new double-circuit towers would be farther from the edge of the ROW than the now existing single-circuit towers.</p> <p>The primary intent of the Phased Build Alternative is to retain the maximum number of existing double-circuit structures. These existing double-circuit structures are located near the center of the ROW in the areas defined for the Tower Relocation Alternative. This Addendum verifies that the newly constructed double-circuit structures (to be located south of and adjacent to the existing structures) would always be located far enough from residences to be consistent with the description of the Tower Relocation Alternative. There is no need to remove and rebuild the existing double-circuit structures at these locations as SCE suggests.</p> |

| SCE Appendix B: Phased Build Alternative | | |
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| SCE Issue | SCE Request | EIR Team Response |
| <p><u>[ITEM 3] Additional Structures (Intersect Structures) would be needed</u></p> <p>The Phased Build Alternative as defined in the FEIR requires SCE to design the new double circuit towers in Segments 3 through 6 to have the “strength capabilities and spans of the Proposed Project double circuit towers” (FEIR p. Ap.5-46). The FEIR also requires (in response to SCE comments on the DEIR) that new double circuit towers be soldiered to match existing double circuit towers under the Phased Build Alternative.</p> <p>The FEIR assumes that the towers can be soldiered because the 2005 DPV2 project design proposed soldiering. The average span length for new towers is 800 ft–1000 ft and the average tower span for existing towers is 1200 ft-1400 ft. The new double circuit towers spans are shorter because they are designed for current wind loading and for suspension of heavier double bundle 1590 conductor. The original DPV2 design had longer spans because the towers were not designed to latest wind loading criteria and had lighter conductor (single 1033 conductor).</p> <p>Installing new double circuit towers as described in the FEIR will result in a significant number of mismatched spans that would require intersect towers. In Segment 4 the number of mismatched spans in addition to the TRA requirements would ultimately lead to nearly no existing double circuit towers being re-used and the ultimate configuration and work scope would be nearly identical to the Proposed Project.</p> <p>The requirement to reuse the existing double circuit 220 kV structures and requiring the new 220 kV structures to be designed to the strength capability and spans for the SCE Proposed Project would not be possible without adding intersect towers.</p> | <p><u>SCE requests the Project Decision recognize the need for additional structures</u></p> <p>The final Project Decision should recognize that additional structures would be necessary to construct the Phased Build Alternative. Provided the number of additional structures does not exceed the estimated total number of structures as described for SCE’s Proposed Project, the Project Decision should also determine that sufficient analysis and disclosure of this scope of work has been presented within SCE comments on the DEIR/DEIS, testimony in the administrative record, and Final Environmental Impact Report.</p> | <p>SCE describes in additional detail the potential need for intersect structures. The Final EIR did not identify a need for intersect structures, as the towers in the alternative are proposed to be paired with existing structures. However, based on the SCE brief, it is now apparent that approximately 105 to 110 existing tower spans may need intersect structures because of the stronger wind loading specification and the need for intersect structures to prevent conductor blowout.</p> <p>This Addendum considers the information and determines that, even with up to 110 intersect structures being required, the Phased Build Alternative remains environmentally superior because:</p> <ul style="list-style-type: none"> ▪ The Phased Build Alternative, even with the intersect towers, would result in 20 to 25 percent less structure construction than with the Proposed Project. ▪ SCE’s design data illustrates substantial flexibility in span length for the new towers – some much greater than the 1,000 ft “average” defined in their latest comment. This indicates that there is potential for final design of the Phased Build Alternative to further minimize the need for intersect towers in specific areas where minimizing visual impacts is especially important. ▪ The Phased Build Alternative would allow approximately 160 existing structures to be retained, whereas in the Proposed Project they would be demolished. |

| SCE Appendix B: Phased Build Alternative | | |
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| SCE Issue | SCE Request | EIR Team Response |
| <p><u>[ITEM 4] Clarification of scope of work for Segment 5 (Morongo reservation)</u></p> <p>The Phased Build Alternative as defined in the FEIR for Segment 5 (Morongo), defined in Section 4.4 of Appendix 5, states that on the “eastern portion of the Morongo land, 30 pairs of new double circuit lattice towers would replace the existing single circuit towers.”</p> <p>There are approximately 30 pairs of double circuit towers proposed on the eastern portion of the Morongo land. The text as quoted implies that all new double circuit towers will be installed in the eastern portion of Segment 5. However, the text in Figure AP.5-5a of the FEIR states that the single circuit towers would be removed and the existing double-circuit towers would remain.</p> <p>If the true requirement is to re-use existing double circuit structures and build new double circuit structures to replace single circuit structures, as seen in Figure AP.5-5a, this Segment will have significant mismatch of tower spans which, as previously noted, cannot be resolved by soldiering given the design requirements of the new towers. Additional interset towers will be required.</p> | <p><u>SCE requests the Project Decision recognize the need for additional structures</u></p> <p>The final Project Decision should recognize that additional structures would be necessary to construct the Phased Build Alternative as described in the FEIR. Provided the number of additional structures does not exceed the estimated total number of structures as described for SCE’s Proposed Project, the Project Decision should also determine that sufficient analysis and disclosure of this scope of work has been presented within SCE comments on the DEIR/DEIS, testimony in the administrative record, and Final Environmental Impact Report.</p> | <p>This comment notes a discrepancy on Figures Ap.5-5a and Ap.5-5b, where a text box indicates some existing double-circuit structures would be retained on Morongo land in Segment 5 under the alternative. The text boxes have been revised to clarify that ALL towers on Morongo land would be removed and replaced with SCE’s Proposed Project towers that could carry 1590 conductors.</p> <p>Note that in the attached revised description of the Phased Build Alternative, this Addendum presents two options for Segment 5 that would further reduce any possibility of future 220 kV upgrades to these circuits having physical effects on Morongo land:</p> <p>Segment 5, Phased Build Alternative Option 1</p> <ul style="list-style-type: none"> ■ All Segment 5 towers (not only the approximately 60 percent on Morongo land) would be removed and replaced with Proposed Project structures, capable of supporting 1590 kcmil conductors. This would acknowledge the complex land ownership pattern in Segment 5, where the current ROW runs along tribal/private parcel boundaries. This option would ensure that no future tower construction would occur on Morongo land. <p>Segment 5, Phased Build Alternative Option 2</p> <ul style="list-style-type: none"> ■ All of Segment 5 (both Morongo and private land) would be initially conductored with 1590 conductor and not 795 Drake ACCR conductor. This would eliminate all possible future effects on Morongo lands, including use of access roads, pull sites, and shoo flies. This would match the Proposed Project in Segment 5. |

| SCE Appendix B: Phased Build Alternative | | |
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| SCE Issue | SCE Request | EIR Team Response |
| <p><u>[ITEM 5] Additional Wire Stringing Sites and Shoo Fly Structures</u></p> <p>The FEIR (Response F1-10) concludes that “in terms of ground disturbance and potential environmental effects the Phased Build Alternative is expected to have less overall environmental impact by reducing the number of existing towers to be removed and new towers to be constructed.”</p> <p>As identified in SCE’s comments to the DEIR/DEIS and testimony, additional wire stringing sites and a significant increase in the number of shoo-fly structures beyond what is described in the FEIR are required to implement the Phased Build Alternative. The incremental environmental impact caused by the increase in wire stringing sites and shoo-fly structures renders the Phased Build Alternative environmentally inferior to the Proposed Project because, among other reasons, the overall ground disturbance and potential environmental impacts of these sites and structures are greater than the potential impacts associated with the Proposed Project. The exact amount of impact associated with additional pull sites and shoo-flies required by the Phased Build Alternative is unknown at this time and will not be confirmed until final engineering. However, the initial review of site layout suggests that there will be significant amount of total ground disturbance added as a result of these features. Extensive amounts of grading and cut and fill of slopes both inside and outside the existing ROW will be needed to construct the wire sites and shoo-flies required to implement the Phased Build Alternative.</p> <p>The required land disturbance of the new wire stringing sites and shoo-fly sites needed to implement the Phase Build Alternative will likely exceed potential reductions in land disturbance associated with the re-use of the existing double circuit towers.</p> | <p><u>SCE requests the Project Decision recognize the need for additional wire stringing sites and shoo fly structures</u></p> <p>The final Project Decision should recognize that additional wire stringing sites and shoo-fly structures would be necessary to construct the Phased Build Alternative, potentially resulting in substantially more ground disturbance than what is currently described in the Final EIR. The Project Decision should also determine that sufficient analysis and disclosure of this scope of work has been presented within SCE comments on the DEIR/DEIS and testimony in the administrative record.</p> | <p>SCE reiterates that additional conductor stringing sites and shoo-fly structures may be needed (see RTC F1-10, F1-11, and F1-14). The Final EIR was modified to acknowledge this concern in the Phased Build Alternative description (page Ap.5-46).</p> <p>Because the Phased Build Alternative would still have less ground disturbance than the Proposed Project, it remains the Environmentally Superior Alternative. As a result, there is no additional change needed to the Final EIR impact analysis (see also RTC F1-11 and F1-14).</p> |

In Segment 1:
Re-use existing double-circuit towers and install new 795 Drake conductors.

In Segment 4:
Remove single-circuit towers and replace with new double-circuit towers. Retain double-circuit towers. Install 795 Drake conductors on all

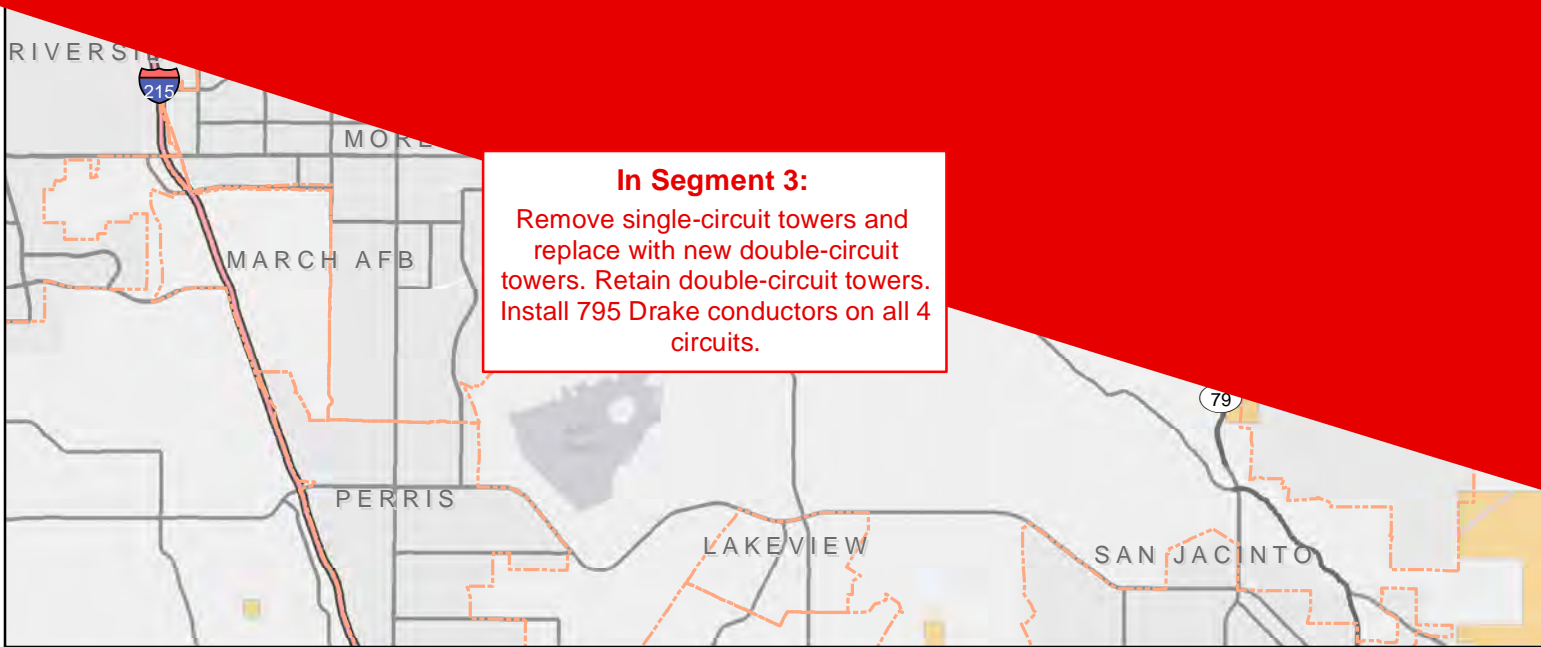
On all Morongo land in Segment 5:
All existing structures would be removed and the structures in the Proposed Project would be installed. Tubular steel poles (at western end) and lattice steel towers (remainder of Morongo lands) would be constructed, as defined in the Morongo-SCE Agreement.

In Segment 2:
Re-use 4 circuits existing double-circuit towers and install new 795 Drake conductors.

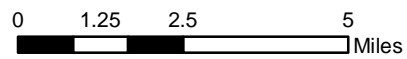
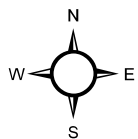
In Segment 3:
Remove single-circuit towers and replace with new double-circuit towers. Retain double-circuit towers. Install 795 Drake conductors on all 4 circuits.

On all non-Morongo land in Segment 5:
The existing single-circuit structures would be removed and existing double-circuit structures would remain. High-capacity Drake conductors would be installed on both the existing and new double-circuit structures (4 circuits).

In Segment 6:
Remove single-circuit towers and replace with new double-circuit towers. Retain double-circuit towers. Install 795 Drake conductors on all 4 circuits.

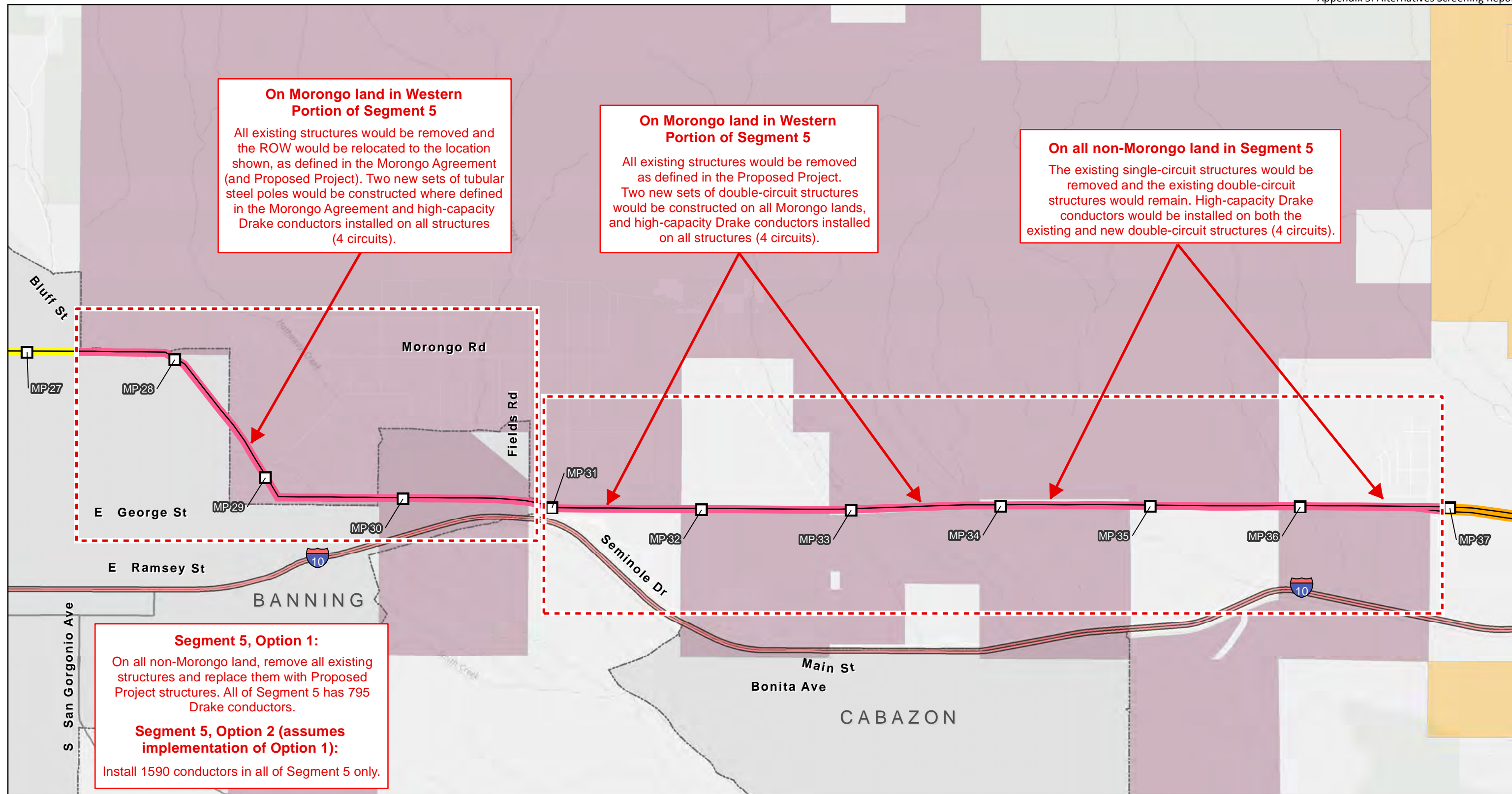


Sources: SCE 2014

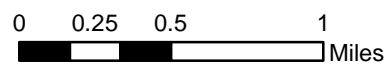
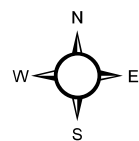


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|---------------|-----------|-----------|-----------------|---------------------|
| Substation | Segment 1 | Segment 4 | Major Highways | BLM Land |
| Milepost | Segment 2 | Segment 5 | Highways | Forest Service Land |
| City Boundary | Segment 3 | Segment 6 | Major Roads | Morongo Reservation |
| | | | County Boundary | |

Updated Description of Phased Build Alternative (February 2016)



Sources: SCE 2014



- Milepost
- ▭ City Boundary
- ↗ Segment 4
- ↖ Segment 5
- ↘ Segment 6
- ⚡ Major Highways
- ⚡ Major Roads
- Morongo Reservation
- BLM Land
- Private Land

West of Devers Upgrade Project

Figure Ap.5-5b
Updated Description of Phased Build
Alternative (February 2016) on Segment 5