

**Valley-Ivyglen Subtransmission Line  
and Alberhill System Project EIR**

**Appendix L  
Responses to Comments**

**Lead Agency:**

California Public Utilities Commission

**Prepared by:**

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## ACRONYMS

AB	Assembly Bill
BLM	Bureau of Land Management
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CAISO	California Independent System Operator
CNPS	California Native Plant Society
CPUC	California Public Utilities Commission
COI	Certificate of Inclusion
CPCN	Certificate of Public Convenience and Necessity
DEIR	Draft Environmental Impact Report
EMFs	Electric and Magnetic Fields
ENA	Electrical Needs Area
EIS	Environmental Impact Statement
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FERC	Federal Energy Regulatory Commission
FEIR	Final EIR
FRONTLINES	Forest Residents Opposing New Transmission Lines
HCP	Habitat Conservation Plan
IEEC	Inland Empire Energy Center
kV	kilovolt
LEAPS	Lake Elsinore Advanced Pump Storage Project
LGIA	Large Generator Interconnection Agreement
MVA	megavolt ampheres
MM	Mitigation Measure
MSHCP	Multiple Species Habitat Conservation Plan
NEPA	National Environmental Policy Act
NERC	North American Electric Reliability Corporation
NOP	Notice of Preparation
ORA	Office of Ratepayer Advocates

PSE	Participating Special Entity
PFM	Petition for Modification
PAD	Pre Application Document
PEA	Proponent’s Environmental Assessment
RWQCB	Regional Water Quality Control Board
RCA	Riverside County Conservation Agency
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SWRCB	State Water Resources Control Board
SKR	Stephen’s kangaroo rat
SWPPP	Storm Water Pollution Prevention Plan
TE/VS	Talega-Escondido/Valley-Serrano
TRTP	Tehachapi Renewable Transmission Project
TACs	toxic air contaminants
TIP	Transportation Improvement Program
USACE	U.S. Army Corps of Engineers
WECC	Western Energy Coordinating Council

## 1.0 Purpose of this Document

This Draft Environmental Impact Report (DEIR) was prepared pursuant to the California Environmental Quality Act (CEQA) to provide information on the environmental impacts, alternatives, and proposed mitigation measures to reduce or avoid significant environmental impacts from the following projects:

- Valley–Ivyglen 115-kilovolt (kV) Subtransmission Line Project (proposed Valley–Ivyglen Project); and
- Alberhill System Project (proposed Alberhill Project)

The responses to comments received during the public comment period provide clarification or amplification of the document’s content, including the project description, impact assessment, alternatives analyses, and mitigation measures. The Final EIR (FEIR) will be used by the California Public Utilities Commission (CPUC) to inform the Commissioners’ decisions pertaining to Southern California Edison’s (SCE) proposed projects.

## 2.0 Regulatory Framework

### 2.1 Public Review under CEQA

The basic purposes of the CEQA are to: (1) inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities, (2) identify the ways that environmental damage can be avoided or significantly reduced, (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible, and (4) to disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.<sup>1</sup> To this end, CEQA requires public review of DEIRs following provision of public notice.<sup>2</sup> Public notice must be posted in the office of the county clerk of each county in which the project shall be located for at least 30 days.<sup>3</sup>

Following the conclusion of the public comment period, the lead agency must evaluate comments on environmental issues and prepare written responses.<sup>4</sup> The Lead Agency’s responses must describe the disposition of significant environmental issues.<sup>5</sup> Where the commenter’s objections are in variance to the major environmental issues raised the comments must be addressed in detail; providing a rationale for why the comments and suggestions were not accepted.<sup>6</sup>

## 3.0 Project Background and Public Response Timeframe

### 3.1 Project Background and Timeline

The CPUC determined that consolidation of the CEQA analyses for the proposed Alberhill System Project and the proposed Valley–Ivyglen Project would be in the public’s best interest as components of the proposed Valley-Ivyglen Project are required for construction of the proposed Alberhill Project and both projects would be constructed simultaneously. Project amendments have also been made to the Alberhill Project since its original proposal in 2009. For more information on amendments and the timeline of both projects, see Table 1 and Table 2.

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<sup>1</sup> CEQA Regulations § 15002(a)(1) – (2).

<sup>2</sup> CEQA Regulations §§ 15086, 87.

<sup>3</sup> CEQA Regulations § 15087(d).

<sup>4</sup> CEQA Regulations § 15088(a).

<sup>5</sup> CEQA Regulations § 15088(b)

<sup>6</sup> Supra n. 5.

**Table 1. Background for the proposed Valley–Ivyglen Project**

January 16, 2007	SCE filed an application (No. 07-01-031) and Proponent’s Environmental Assessment with the CPUC for a Permit to Construct the Valley–Ivyglen 115-kV Subtransmission Line
April 30, 2007	SCE filed an application (No. 07-04-028) and Proponent’s Environmental Assessment with the CPUC for a Permit to Construct for the Fogarty Substation
June 7, 2007	CPUC determined that the Valley–Ivyglen 115-kV Subtransmission Line and Fogarty Substation applications would be consolidated into a single proceeding for CEQA analysis
December 21, 2007	CPUC deemed the Valley–Ivyglen 115-kV Subtransmission Line and Fogarty Substation applications complete
June 2009	CPUC released the Draft Environmental Impact Report (EIR) for the Valley–Ivyglen 115-kV Subtransmission Line and Fogarty Substation Project
May 2010	CPUC released the Final EIR for the Valley–Ivyglen 115-kV Subtransmission Line and Fogarty Substation Project
August 12, 2010	CPUC issued Decision 10-08-009 granting SCE a Permit to Construct the Valley–Ivyglen Subtransmission Line and Fogarty Substation Project
June 2011 through January 2012	SCE substantially constructed Fogarty Substation
April 2, 2013	SCE filed a Petition for Modification (PFM) for the Valley–Ivyglen Subtransmission Line and Fogarty Substation Project
August 2013	CPUC determined it was in the public’s best interest to consolidate the environmental reviews of the Valley–Ivyglen Subtransmission Line Project and SCE Alberhill System Project Certificate of Public Convenience and Necessity (CPCN) application (A. 09-09-022; proposed Alberhill Project) into one EIR
March 26, 2014	SCE filed a Motion to Bifurcate consideration of the modifications proposed to complete Fogarty Substation from consideration of the modifications proposed to start construction of the Valley–Ivyglen Subtransmission Line.
August 28, 2014	CPUC approved bifurcation of Fogarty Substation from the Valley–Ivyglen Subtransmission Line Project
May 23, 2014	SCE filed an amended PFM for the Valley–Ivyglen Subtransmission Line Project (proposed Valley–Ivyglen Project)
April 28, 2015	CPUC deemed the PFM for proposed Valley–Ivyglen Project complete.
May 6, 2015	CPUC released a Notice of Preparation (NOP) for the proposed Alberhill Project and proposed Valley–Ivyglen Project

**Table 2. Background for the proposed Alberhill Systems Project**

September 30, 2009	Application submitted to the CPUC (Application A.09-09-022).
March 15, 2010	SCE filed an amendment to the application ( <u>Application A.09-09-022, amended</u> )
April 11, 2011	SCE filed amended sections of the Proponent’s Environmental Assessment (PEA) to modify transmission line alignments to avoid a Stephens’ Kangaroo

	Rat core reserve
August 2013	CPUC determined it was in the public’s best interest to consolidate the environmental reviews of the Valley–Ivyglen Subtransmission Line Project and SCE Alberhill System Project CPCN application (A. 09-09-022; proposed Alberhill Project) into one EIR
May 6, 2015	CPUC released an NOP for the proposed Alberhill Project and proposed Valley–Ivyglen Project

**3.2 Draft EIR Public Outreach**

On April 14, 2016, the CPUC released a DEIR for both projects and opened the projects for public review and comment. Specifically, the DEIR addressed:

- Background and objectives of the proposed project;
- Description of proposed project
- Process of evaluating alternatives;
- Analysis and assessment of impacts and mitigation measures for the proposed project;
- Impacts of the proposed project and comparison of alternatives (including the No Project Alternative);
- Past, present, and reasonably foreseeable future projects within the cumulative study area that may be constructed or commence operation during the timeframe of activity associated with the proposed project; and
- Other CEQA considerations.

The original public review period for the DEIR was April 14, 2016 through May 31, 2016. Due to requests received from commenters, the CPUC approved an extension of the public review period to July 15, 2016.

The CPUC held public meetings on May 11<sup>th</sup> and 12<sup>th</sup>, 2016 to explain the proposed projects, discuss the proposed project’s significant impacts, and receive comments on the Draft EIR from the public. The first meeting was held at the Lake Elsinore Cultural Arts Center in Lake Elsinore from 6:00 – 8:00pm. The second meeting was held at the Cesar E. Chavez Library in Perris from 12:30 to 2:30pm on May 12, 2016. Each public meeting began with a brief presentation and was followed by a period to answer specific questions, and concluded with an oral public comment period. A stenographer transcribed the public meetings.<sup>7</sup>

Agencies, organizations, and the public were invited to submit written comments until the public review period terminated on July 15, 2016. The CPUC will base the information and extent of analysis in the Final EIR on input and comments received during the public review period.

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<sup>7</sup> Please see Table 3 for locations where written comments could be submitted and Table 4 for where hardcopy locations were located.

**Table 3. Methods for Submitting Written Comments**

<p><b>Email:</b> <a href="mailto:VIG.ASP@ene.com">VIG.ASP@ene.com</a>  <b>Fax:</b> 415-398-5326</p>	<p><b>Mail:</b> California Public Utilities Commission  RE: VIG/ASP  c/o Ecology and Environment, Inc.  505 Sansome Street, Suite #300  San Francisco, CA 94111</p>
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**Table 4. Draft EIR Hardcopy Locations**

<p><b>Lake Elsinore Library</b>  600 West Graham Avenue  Lake Elsinore, CA 92530  (951) 674-4517</p>	<p><b>Paloma Valley Library</b>  31375 Bradley Road  Menifee, CA 92584  (951) 301-3682</p>
<p><b>Canyon Lake Library</b>  31516 Railroad Canyon Road  Canyon Lake, CA 92587  (951) 244-9181</p>	<p><b>City of Perris Cesar E. Chavez Library</b>  163 East San Jacinto Avenue  Perris, CA 92570  (951) 657-2358</p>
<p><b>Wildomar Library</b>  34303 Mission Trail  Wildomar, CA 92595  (951)471-3855</p>	

## 4.0 Overview of Comments Received

The CPUC received nearly 1,300 comments during the public comment period. Nearly four hundred commenters representing governmental agencies, public and private organizations, and individuals submitted these comments. Comments included comments on specific resource areas, mitigation measures, alternatives, and general opposition to the proposed projects.

## 5.0 Identification of Commenters

### 5.1 Federal

- [FEMA, Floodplain Management and Insurance Branch \(Letter # 44\)](#)
- [U.S. Fish and Wildlife Service \(Letter # 111\)](#)

### 5.2 State

- [Governor's Office of Emergency Services, Public Safety Division \(Letter # 112\)](#)
- [Office of Ratepayer Advocates \(Letter # 376\)](#)
- [CA Department of Fish and Wildlife \(Letter # 111\)](#)

### 5.3 Local

- [Riverside County, Planning Department \(Letter # 50\)](#)
- [Riverside County, Transportation Department \(Letter # 337\)](#)
- [City of Lake Elsinore \(Letter # 248\)](#)

- [City of Moreno Valley, Community Development Department \(Letter # 33\)](#)
- [City of Wildomar \(Letter # 377\)](#)
- [Bay Area Municipal Transmission Group \(BAMx\) \(Letter # 47\)](#)

#### 5.4 Native American Tribes

- [Pechanga Band of Luiseno Indians \(Letter # 109\)](#)

#### 5.5 Private Entities and Organizations

- [Crosbie Gliner Shiffman Southard & Swanson LLP \(CGS3\) \(Letter # 108\)](#)
- [Diversified Pacific \(Letter # 91\)](#)
- [Forestar Toscana \(Letter # 113\)](#)
- [FRONTLINES \(Forest Residents Opposing New Transmission Lines\) \(Letters # 51, # 99, and # 110\)](#)
- [Glen Eden Sun Club \(Letters # 9, # 16, and # 68\)](#)
- [Horsethief Canyon Ranch and Lemon Grove Residents \(Letter # 104\)](#)
- [Sycamore Creek Community \(Letter # 19\)](#)
- [The Giardinelli Law Group \(Letters # 6, # 118, and # 63\)](#)
- [The Nevada Hydro Company \(Letter # 4\)](#)
- [We Are Temescal Valley \(Letter # 324\)](#)

#### 5.6 Project Proponent

- [Southern California Edison \(Letter # 135\)](#)

#### 5.7 Private Citizens

##### A - C

- Adams, Jennifer (Letter # 208)
- Agajanian, Tara (Letter # 130)
- Angier, Dorri (Letter # 131)
- Ann Matilla, Lennox (Letter # 209)
- Aplin, Beth (Letter # 210)
- Appleby, James (Letter # 88)
- Appleman, Catherine (Letter # 381)
- Arcila, Veronica (Letter # 211)
- Ax, Rebecca (Letter # 132)
- Bailey, Cory (Letter # 133)
- Ballantyne, (Letter # 212)
- Barton, Doniphon (Letter # 213)
- Baulk, D'Amileau (Letter # 214)
- Baumann, Allison (Letter # 215)
- Bear, Bruce and Peggy (Letter # 22)
- Beck, Kathleen (Letter # 86)
- Behany, Tiffany & Bill (Letter # 216)
- Bell, Cindy (Letter # 10)
- Bell, Darlene (Letter # 232)
- Bell, Robert (Letter # 134)
- Biddle, Christa (Letter # 217)
- Blair, Noreen (Letter # 218)
- Blue, Cassie (Letter # 137)
- Bollin, Rachel (Letter # 66)
- Booze, April (Letter # 38)
- Bowen, Dawn (Letter # 386)
- Bradley, Julie (Letter # 219)
- Bradshaw, Andrea (Letter # 114)
- Bradshaw, Nicholas (Letter # 115)
- Brisken, Dan (Letter # 48)
- Bryant, Cheryl (Letter # 54)

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- Bullock, Jolene, Woody, and Michael (Letter # 279)
  - Bustamante, Darlene (Letter # 220)
  - Camarena, Mayra (Letter # 221)
  - Campos, Mario (Letter # 207)
  - Cane, Pam & Kevin (Letter # 368)
  - Carlstrom, Howard and Diana (Letter # 73)
  - Casal, Lori (Letter # 222)
  - Castanon, Damien (Letter # 74)
  - Castleman, Patt (Letter # 223)
  - Castro, Oscar (Letter # 224)
  - Cervantes, Carlos (Letter # 59)
  - Chandler, Aaron (Letter # 225)
  - Chandler, Tara (Letter # 226)
  - Cherokee, Caryn (Letter # 227)
  - Cobbaert, Marcie (Letter # 120)
  - Cobbaert, Pierre (Letter # 369)
  - Cole, Nancy (Letter # 139)
  - Cole, Nancy and Carl (Letter # 23)
  - Cook, Regina (Letter # 140)
  - Cooley, Linda (Letter # 366)
  - Coon, Bobbi & Dana (Letter # 228)
  - Corral, Jeanie (Letter # 70)
  - Cortez, Lupe (Letter # 229)
  - Cosmos, Tiger (Letter # 24)
  - Coward, Courtney (Letter # 141)
  - Cutuli, Peter (Letter # 80)
  - Cutuli, Tina (Letter # 81)
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- Dahl, Laurie (Letter # 230)
  - Dang, Loc & Huong (Letter # 231)
  - Daniello, Peter and Janice (Letter # 385)
  - Davies, Michael (Letter # 233)
  - Davis, Dave (Letter # 116)
  - Davis, Margaret (Letter # 117)
  - Davis, Maria (Letter # 17)
  - Davis, Tracy (Letter # 96)
  - Dean, Richard (Letter # 142)
  - Debbaneh, Yana (Letter # 26)
  - Deleo, Craig (Letters #235 and # 236)
  - De Leon, Allan (Letter # 289)
  - De Leon, Olivia (Letter # 234)
  - Dodd, Gregory (Letter # 237)
  - Dodd, Heidi (Letter # 143)
  - Donahoe, Carole (Letter # 239)
  - Donis, Louie (Letter # 240)
  - Du, Kevin (Letter # 11 and #82)
  - Du, Meredith (Letter # 83)
  - Duarte, Jose (Letter # 241)
  - Duarte, Giannina & Nicole (Letter # 387)
  - Duckworth, Robby (Letter # 246)
  - Edmondson, Chance (Letter # 144)
  - Ehrlich, Chase (Letter # 247)
  - Ekrauss (Letter # 388)
  - English, Dennis (Letter # 364)
  - Etienne, Maron (Letter # 249)
  - Evans, Kaylynn (Letter # 76)
  - Fenech, Anthony (Letter # 77)
  - Ferguson, Jack (Letter # 45)
  - Fesperman, Erica (Letter # 250)
  - Fleming, Tim (Letter # 121)
  - Flores, Miguel (Letter # 379)
  - Fornaro, Jennifer (Letter # 251)
  - Frank, Richard and Ann (Letter # 42)

- Fuller, Heather (Letter # 58)

### G - I

- Garcia, Freedom (Letter # 252)
- Garcia, Yvonne (Letter # 370)
- Garrett, Franchiska (Letter # 146)
- Geddes, Kathleen and Robert (Letter # 253)
- Geddes, Robert (Letter # 254)
- Giandalia, Pamela (Letter # 20)
- Gibilterra, Nancy (Letter # 65)
- Gillespie, Gina (Letter # 255)
- Glass, Jonathan and Mandi (Letter # 85)
- Gonzales, Christina (Letter # 374)
- Gonzalez-Peralta, Christina (Letter # 256)
- Goodall, Josh (Letter # 257)
- Grace, Kim (Letter # 258)
- Grace, Roger (Letter # 389)
- Graham, Thresee (Letter # 147)
- Gray, Amber (Letter # 148)
- Gray, John (Letter # 260)
- Gray, Sandra (Letter # 149)
- Greany, Patrick (Letter # 259)
- Grebe, Kay (Letter # 87)
- Gregory, Dodd (Letter # 238)
- Griffith, Thomas (Letter # 261)
- Guerrero, Enrique (Letter # 262)
- Gula, Robert (Letter # 150)
- Gula, Vanda (Letter # 151)
- Gulledge, Karl (Letter # 263)
- Haag, Steven (Letter # 69)
- Haddad, Samir (Letter # 264)
- Haley, Angela (Letter # 152)

- Hall, Jessica (Letter # 265)
- Hansen, Janet (Letter # 39)
- Harding, Juanita (Letter # 41)
- Harris, Donna (Letter # 153)
- Hart, Dennis (Letter # 154)
- Hasler, Rosa (Letter # 266)
- Hatcher, Jessica (Letter # 267)
- Hazinski, Heather (Letter # 383)
- Heaston, Jeanelle (Letter # 155)
- Heinze, Julie (Letter # 84)
- Hinojosa, Maria (Letter # 268)
- Hirsch, Christina (Letter # 269)
- Hiss, Arlene (Letter # 157)
- Hoag, Matthew (Letter # 270)
- Hoag, Tracy (Letter # 271)
- Holm, Marlene (Letter # 158)
- Howell, Melissa (Letter # 272)
- Hubbard, Sally (Letter # 159)
- Hunzeker, Nancy (Letter # 160)
- Hurtado, Jeannette (Letter # 273)
- Hurtado, Oscar (Letter # 274)
- Hyun, Joh Joo (Letter # 275)
- Inderbitzen, Erik (Letter # 276)
- Isom, Sandra (Letter # 122)

### J - L

- Jackson, Marilyn (Letter # 242)
- Jacobo, Denise & Abelardo (Letter # 277)
- Jannuzzi, Laura (Letter # 93)
- Jiron, Ann (Letter # 278)
- Johnson, Lisa (Letter # 35)
- Johnson, Melanie (Letter # 3)
- Jordan, Shelly (Letter # 280)

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- Kalyani, Dhairya (Letter # 282)
  - Keith, Charles (Letter # 283)
  - Keith, Cindy (Letter # 285)
  - Kelley, Paul (Letter # 284)
  - Keo, Pany (Letter # 371)
  - Kilgore, Dana (Letter # 286)
  - Kinne, Amie (Letter # 100)
  - Kleist, Joe (Letter # 124)
  - Kleist, Joe and Kim (Letter # 101)
  - Kleist, Kim (Letter # 123)
  - Knoepfel, Janet (Letter # 21)
  - Kolodge, Lisa (Letter # 161)
  - LaLonde, Tim (Letters # 64 and # 378)
  - Lange, Martin and Sabine (Letter # 49)
  - Lange, Sabine (Letter # 162)
  - LaRosa, Dana (Letter # 163)
  - Larsen, John (Letter # 288)
  - LePenske, Michaele (Letter # 164)
  - Lesovsky, Wendy (Letter # 290)
  - Lester, Clarence (Letter # 291)
  - Lewis, Richard and Sue (Letter # 125)
  - Lewis-Snyder, James (Letter # 365)
  - Lopez, Jackie (Letter # 165)
  - Lucas, James (Letter # 166)
  - Luepnitz, Patrick and Doreen (Letter # 106)
  - Luna, Dionne & Jorge (Letter # 292)
  - Marquez, Sandra (Letter # 169)
  - Marete-Charlot, Elizabeth (Letter # 393)
  - Martinez, Steve (Letter # 89)
  - Matiran, Cindy (Letter # 15)
  - Mayer, Lyn (Letter # 1)
  - Mayes, Kenneth (Letter # 296)
  - McClure, Donna (Letter # 126)
  - McDonald, Janet (Letter # 92)
  - McDonald, Todd (Letter # 105)
  - McKasson, Don (Letter # 18)
  - McLain, Mary (Letter # 43)
  - Mihlbauer, Juli (Letter # 170)
  - Miller, Kevin (Letter # 297)
  - Mirabella, Frances (Letter # 171)
  - Miranda, Brandie (Letter # 298)
  - Mitchell, Stacey (Letter # 172)
  - Moore, Carly (Letter # 30)
  - Moore, Carly (Letter # 382)
  - Moore, Jo Ann (Letter # 300)
  - Moore, Roseann (Letter # 173)
  - Morairty, Terry (Letter # 127)
  - Moya, Rebecca (Letter # 174)
  - Mucha, Rob (Letter # 301)
  - Mutka, Jason (Letter # 302)
  - Nay, Eric (Letter # 27)
  - Neer, Stacia (Letter # 303)
  - Noble, Kimberly (Letter # 175)
  - Norman, Joseph (Letter # 281)
  - Norton, Anthony (Letter # 304)
  - Noss, Kelli (Letter # 12)
  - Null, Justin (Letter # 305)
  - O'Doherty, John (Letter # 13)
  - Olson, Ruth (Letter # 177)
- M - O**
- MacLean, Greg (Letter # 60)
  - Maddock, Stephanie (Letter # 167)
  - Makshanoff, Heather (Letter # 168)
  - Maness, John (Letter # 293)
  - Manos, Veronica (Letter # 294)

- Osborne, Gena (Letter # 36)
- Osborne, John (Letter # 306)

**P - S**

- Parks, Denise (Letter # 307)
- Parrish, Donna (Letter # 308)
- Paul, Barbara and Robert (Letter # 71)
- Paulus, Karmen (Letter # 119)
- Petersen, Cindy (Letter # 178)
- Pham, Christine (Letter # 179)
- Pietila, Sheila (Letter # 180)
- Pratt, Amanda (Letter # 67)
- Pratt, Chad (Letter # 181)
- Pratt, Kristen (Letter # 182)
- Prime, Debbie (Letter # 309)
- Pruden, Brenda (Letter # 102)
- Rainey, Michael (Letter # 183)
- Rainwater, Brian and Kelly (Letter # 97)
- Rauf, Mohammad (Letter # 310)
- Reade, Stephanie (Letter # 78)
- Ridenour, Linda Lou and Martin (Letter # 34)
- Rindal, Darlene (Letter # 184)
- Rippy, Douglas (Letter # 367)
- Ristow, Justin (Letter # 14)
- Robinson, Nancy (Letter # 311)
- Rogan, Avise (Letter # 312)
- Ryan, Kimberly (Letter # 185)
- Ryu, Edward (Letter # 313)
- Salinas, Diana (Letter # 314)
- Sandlin, Grace (Letter # 315)
- Sauls, Garret (Letter # 316)
- Schanz, Jodi (Letter # 317)
- Schaper, Greg (Letter # 318)

- Schneller, Kele (Letter # 319)
- Sellers, Denise (Letter # 7)
- Serrato, Jennifer (Letter # 320)
- Seung, Joh Young (Letter # 321)
- Shambaugh-Simas, Stephani (Letter # 186)
- Shenouda, Mina (Letter # 322)
- Shepard, Tom and Janice (Letter # 29)
- Sherman, David (Letter # 28)
- Shumaker, Joy (Letter # 323)
- Silerman, (Letter # 187)
- Silver, Ron (Letter # 55)
- Sincich, Jerry (Letter # 46)
- Sites, Michelle (Letter # 325)
- Slocum, Brian (Letter # 94)
- Smith and Strunk, Debra and Bill (Letter # 375)
- Smith, Debra (Letters # 188 and # 394)
- Smith, Karen & David (Letter # 326)
- Smith, Pamela & Brian (Letter # 327)
- Sneller, Teri (Letter # 56)
- Snyder, Karen & Jim (Letter # 328)
- Solomon, Lauren (Letter # 329)
- Stevens, Danny (Letter # 189)
- Stevens, Trudee (Letter # 395)
- Suter, Paul (Letter # 330)
- Swanson, Doug and Terri (Letter # 62)
- Sykes, Regina (Letter # 192)
- Sykes, Regina & Sean (Letter # 191)

**T - Z**

- Tainpakdipat, Pasukan (Letter # 372)
- Taylor, Grant (Letter # 332)
- Tetlow, Deanna (Letter # 333)

- Tetlow, Michael (Letter # 334)
- Thompson, Cara (Letter # 335)
- Tomsen, Teresa (Letter # 336)
- Torian, Kevin (Letter # 95)
- Torralba, Judy (Letter # 194)
- Trujillo, Angelica (Letter # 98)
- Tucker, Justin (Letter # 338)
- Tucker, Penny (Letter # 339)
- Tupper, Robert (Letter # 340)
- Turton, Amanda (Letter # 341)
- VanderMeer, Rikki (Letter # 90)
- Vasquez, Carlos (Letter # 195)
- Vance (Letter # 384)
- Velasquez, Raul (Letter # 342)
- Velastegui, Oscar (Letter # 344)
- Velastegui, Oscar & Marivel (Letter # 343)
- Velazquez, Anna (Letter # 196)
- Velazquez, Robert (Letters # 197 and # 396)
- Veliz, Armando (Letter # 346)
- Vestal, Erica (Letter # 347)
- Villasenor, Rose (Letter # 348)
- Villen, Rose (Letter # 198)
- Vinson, Janeane (Letter # 199)
- Walker, Liddy (Letter # 349)
- Walter, Colleen (Letter # 350)
- Ward, Becky (Letter # 37)
- Washburn, Gary (Letter # 128)
- Washburn, Susan (Letter # 129)
- Watson, John (Letter # 351)
- Wemhoff, Tom & Jamie (Letter # 352)
- Wiggins, Dana & Andrea (Letter # 353)
- Wilcher, Keli (Letter # 201)
- Wild, Cynthia (Letter # 72)
- Willhide, Toni (Letter # 354)
- Williams, Stephani (Letter # 355)
- Wilson, Lee (Letter # 356)
- Wilson, Teresa (Letter # 357)
- Wooldridge, Dennis (Letter # 358)
- Woolsey, Denise (Letter # 202)
- Wright, Barbara (Letter # 359)
- Wright, Johnna (Letter # 360)
- Yoo, Anna (Letter # 361)
- Young, Audrey (Letter # 362)
- Young, Melanie (Letters # 57 and # 79)
- Z, John (Letter # 40)
- Zurick, Andryce (Letter # 363)

## **5.8 Comments Received During Public Meetings on the Draft EIR**

- Lake Elsinore Public Meeting, May 11, 2016 (# 385)
- Perris Library Public Meeting, May 12, 2016 (# 386)

## 6.0 Response to Comments

### FEMA, Floodplain Management and Insurance Branch (Letter # 44)

- 44-1:** Comment noted. The proposed project would comply with the National Flood Insurance Program floodplain management building requirements for any components sited within a floodplain, such as a transmission component or roadway. Note that the Alberhill Substation site is not located within a Regulatory Floodway as delineated on the Flood Insurance Rate Map.
- 44-2:** Structures associated with the proposed project would be designed to be at or above the Base Flood Elevation. In addition, access roads and drainages would be designed to minimize project impacts associated with flooding to a less than significant level.
- 44-3:** The commenter's contact information has been noted.

### U.S. Fish and Wildlife Service (Letter # 111)

- 111-1:** Text has been added to Section 4.4.4.2, Impact BR-1. According to the Multiple Species Habitat Conservation Plan (MSHCP) (Section 6.14, Urban/Wildlands Interface Guidelines), the following guidelines must be considered when the proposed project is being reviewed for consistency with the MSHCP, when contemplating development within or adjacent to criteria cells or sensitive habitats. These guidelines would address most, if not all, of the Agencies' concerns regarding impacts during the operation phase of the proposed project.
1. Lighting - Night lighting shall be directed away from the MSHCP Conservation Areas, and shielding shall be incorporated into project design.
  2. Noise - noise generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms or walls to minimize the effects of noise.
  3. Barriers - Proposed land uses adjacent to the MSHCP Conservation Area shall incorporate barriers where appropriate, to minimize unauthorized public access, illegal trespass, dumping and domestic animal predation.
  4. Invasives - SCE would avoid the planting of any invasive species listed within the MSHCP, as part of landscaping plans after the construction of the proposed project. In addition, an Invasive Species Management Plan will be developed to address the spread of invasive species during construction and operation.
- 111-2:** SCE is currently in the process of obtaining Participating Special Entity (PSE) status in the MSHCP, through a Certificate of Inclusion (COI), to allow for coverage of the entire proposed project alignment. The COI will include incidental take authorization and require contribution of funds for land acquisition, management, and monitoring. Therefore, no further compensatory mitigation will be required.
- 111-3:** See response to comment 111-2.

- 111-4:** The commenter's suggested edit has been incorporated into the text.
- 111-5:** The commenter's suggested edit has been incorporated into the text.
- 111-6:** The commenter's suggested edit has been incorporated into the text.
- 111-7:** The commenter's suggested edit has been incorporated into the text.
- 111-8:** SCE is currently in the process of obtaining PSE status in the MSHCP, through a COI, to allow for coverage of the entire proposed project alignment. The COI will include incidental take authorization and require contribution of funds for land acquisition, management, and monitoring. Participation in the MSHCP would reduce impacts on all species and habitat that would be affected by the project, including the Quino checkerspot butterfly. Therefore, no further compensatory mitigation will be required.
- 111-9:** See response to comment 111-8.

**Governor's Office of Emergency Services, Public Safety Division (Letter # 112)**

- 112-1:** The microwave tower and the associated antennas will cause negligible level of interference with radio frequencies commonly used for Public Safety radio broadcasts. Microwave transmissions use different frequencies than those used by FM and AM radio broadcasts and are focused in a narrow beam about the size of the microwave antenna. Furthermore, transmissions are point to point and not spread over wide areas. As such, the microwave power levels are much lower than radio transmissions and generally do not cause interference with them. Therefore, a radio frequency intermodulation study is not required.
- 112-2:** See response to comment 112-1. A radio spectrum study would not be required.

**Office of Ratepayer Advocates (Letter # 376)**

- 376-1:** In response to Office of Ratepayer (ORA's) request, the Energy Division granted an extension.
- 376-2:** The CPUC's Energy Division acknowledges receipt of the background information submitted by the commenter, which discusses system configuration of the service area including the SCE's Valley Substation and transformer sections.
- 376-3:** See response to comments 376-6 through 376-10.
- 376-4:** The CPUC's Energy Division acknowledges receipt of the background information summarized by the commenter.
- 376-5:** See response to comments 376-6 through 376-10.
- 376-6:** The No Project Alternative for the Valley-Ivyglen Subtransmission Line Project is discussed in Chapter 3.0, Sections 3.3.6. According to the applicant, failure to construct the Valley-Ivyglen

Subtransmission Line Project may result in electrical demand exceeding the operating limits of existing facilities. Moreover, there would be no improvement in system reliability or operational and maintenance flexibility within the electrical needs area. Therefore, the No Project Alternative would not meet the project objectives. See Appendix K regarding an explanation of the project objectives. See response to comment 376-7 regarding modifications to the “No Project” Alternative.

- 376-7:** This alternative would not require a permit and therefore is considered part of the “No Project” Alternative. The text related to the No Project Alternative has been updated in Chapter 3. Note that the No Project alternative would not meet the project objectives and would not relieve projected electrical demand that exceeds the operating limits of the existing facilities because it would not provide additional support to the existing operating limits of the existing facilities.
- 376-8:** See Appendix K, which details the CPUC's analysis of the Valley Substation Upgrades. This configuration would not meet the project objectives.
- 376-9:** See Appendix K, which details the CPUC's analysis of the Inland Empire Energy Center (IEEC) Interconnection. This configuration would not meet the project objectives.
- 376-10:** See Appendix K, which details the CPUC's analysis of the 230-kV interconnection. According to the power flow analysis, the 230-kV Moraga tie-in would fail to alleviate the need for additional capacity and would not meet the project objectives. Moreover, under this arrangement, power would flow from the Valley South area into the San Diego system, providing support to the San Diego system rather than the Valley South System.
- 376-11:** See response to comments 376-6 through 376-10.

#### [CA Department of Fish and Wildlife \(Letter # 111\)](#)

U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (CDFW) submitted a combined comment letter. For responses to CDFW’s letter, see responses to U.S. Fish and Wildlife Service ([Letter #111](#))

#### [Riverside County, Planning Department \(Letter # 50\)](#)

- 50-1:** See responses to comments 50-2 through 50-5.
- 50-2:** The analysis of potential visual impacts for the I-15 Freeway is included in Section 4.1.4.2. It includes an analysis both for construction and for the operation of the project. As shown for construction, mitigation measures are required and thus, the potential to impact the view from the freeway is acknowledged. The mitigation during construction includes a revegetation plan and that the staging areas are screened. During operation, visual impacts are noted as less than significant. Three key viewpoints were evaluated in order to determine this finding, including Key Viewpoints 1, 2, and 9. Simulations of the proposed project were developed for each of these locations. None of the three showed a significant change in the level of vividness, intactness, or unity - for which the project was evaluated. Your statement, however, is included in the public record and will be taken into account by decision-makers.

- 50-3:** The impacts of the proposed project on MSHCP lands are discussed in detail in the EIR. SCE intends to become a Participating Special Entity for all phases of the project and will be subject to all applicable provisions of the MSHCP for the duration of the project, which would ensure there are no significant impacts.
- 50-4:** The CPUC acknowledges Riverside County's concerns related to siting of Alternative DD within the Serrano Commerce Center Site, including its potential placement within the Open Space Conservation areas identified in Specific Plan 353. The description of Alternative DD has been updated to clarify that Temescal Canyon Road would be constructed per the specifications of Specific Plan 353. In addition, per responses to comments 113-7 through 113-23, as well as cumulative impacts related to the Nevada Hydro LEAPS project, Alternative DD is no longer considered the Environmentally Superior Alternative. The Commission will take all comments into account when making a decision on the project.
- 50-5:** The CPUC acknowledges Riverside County's concerns related to mineral resources. The discussion under “Geology, Soils, and Mineral Resources” in Section 5.3.2 has been updated to disclose the potential of greater impacts on this resource.
- 50-6:** Per response to comment 50-4, Alternative DD is no longer considered the Environmentally Superior Alternative. For an explanation of potential increases in aesthetic and habitat impacts related to this alternative, see the revised discussions under Section 5.3.2.

#### **Riverside County, Transportation Department (Letter # 337)**

- 337-1:** See response to comment 337-1. Note that exact placement of components would be determined during final engineering.
- 337-2:** The CPUC reviewed the Temescal Canyon Area Plan and the County of Riverside Transportation Department’s Transportation Improvement Program 2015/16 & 2016/17 Biennial Report (TIP). While the Temescal Canyon Area Plan identifies Temescal Canyon Road as an arterial highway, the future expansions described in the available TIP are located northwest of the Ivyglen Substation and the proposed VIG8 segment. Currently, there is no documented timeline associated with upgrading the portion of Temescal Canyon Road that coincides with VIG 8. Therefore, this expansion is considered speculative, and impacts associated with the roadway expansion cannot be assessed. No changes have been made to the EIR.

#### **City of Lake Elsinore (Letter # 248)**

- 248-1:** See responses 248-2 through 248-26.
- 248-2:** In cases where a visual impact was identified, mitigation was included to reduce the impact, which included either undergrounding or other measures. See Section 4.1, Aesthetics. In addition, the CPUC considered undergrounding alternatives. See Chapter 5.0, Comparison of Alternatives.
- 248-3:** See response to comment 248-2.

**248-4:** See response to comment 248-2.

**248-5:** See response to comment 248-2.

**248-6:** See response to comment 248-2.

**248-7:** See response to comment 248-2.

**248-8:** See response to comment 248-2.

**248-9:** The commenter is correct regarding the CPUC's position on the scientific evidence of Electric and Magnetic Fields (EMFs). Note that the CPUC's position regarding EMFs has been moved to Section 2.5.4, Electric and Magnetic Fields.

**248-10:** See response to comment 248-9.

**248-11:** See response to comment 248-9.

**248-12:** Comment noted.

**248-13:** A comment letter received from the California Department of Transportation, Division of Aeronautics during scoping stated that:

“Skylark Field Airport operates with a Special-Use Airport Permit issued by the Division. The transmission lines should not result in hazards to flight, such as: obstructions to the navigable airspace required for flight to, from, and around an airport; visual hazards associated with distracting lights, glare, and sources of smoke; or, electronic hazards that may interfere with aircraft instruments or radio communication. We advise coordinating with the Airport Manager, Karl Gulledge, at (951) 245-9939, to ensure that the proposal is compatible with future as well as existing airport operations.”

The Division has technical expertise in the areas of airport operations safety, noise and airport land use compatibility. Pursuant to this comment letter, Karl Gulledge, the Skylark Field Airport Manager, was consulted regarding potential impacts on the airport. Mr. Gulledge indicated via a phone conversation on May 17, 2010 that he did not have any concerns with regard to operation of the Alberhill System Project as long as the poles were no taller than 120 feet. Mr. Gulledge was again contacted on July 13, 2015 to verify his previous statements, and stated that he “will stand by [his] support of [the] project.”

The project's hazards and hazardous materials impacts related to the influence area of the Skylark Airport were evaluated Section 4.8, Hazards and Hazardous Materials, under Section 4.8.5.2. As described therein, pursuant to the findings of the airport manager, the project would not result in any significant impacts under project or cumulative conditions because the lightweight steel poles to be installed along segments ASP4 and ASP5 would be less than 120 feet in height and would not result in a safety hazard. Therefore, impacts would be less than significant. The commenter does not offer any evidence that the installation of lightweight

poles less than 120 feet in height along segments ASP 4 and ASP 5 would result in significant hazard impacts; therefore, no further response can be provided.

- 248-14:** See the response to comment 248-13 for further analysis of impacts to Skylark Field Airport. In addition, the applicant is required to comply with all applicable laws, including Federal Aviation Administration (FAA) regulations.
- 248-15:** Potential impacts on ingress/egress are evaluated as part of Section 4.15, Transportation and Traffic. A traffic management plan will be developed to help maintain emergency access, to ensure limited delays or to plan detours, and to prevent safety hazards. It would not be possible to place overhead signage within 10 feet of radial clearance per the CPUC regulations, as noted in Section 4.8.2.2. Traffic impacts would be less than significant or less than significant with mitigation. Per CEQA Section 15131, CEQA does not require an analysis of economic impacts.
- 248-16:** Per CEQA Section 15131, CEQA does not require an analysis of economic impacts. Per Section 4.1, Aesthetics, visual impacts would be reduced to less than significant with mitigation. Considering that the project would result in less than significant aesthetic impacts or impacts that would be mitigated to less than significant, the construction of the project would not result in blight or urban decay.
- 248-17:** Lake Elsinore is a community that is primarily comprised of a population identifying as white (77.1% as of July 1, 2015 - US Census) and with a 11.3% poverty rate as noted in the 2014 American Community Survey (as compared to 12.3% for the state and 14.8% for the country). In this manner, Lake Elsinore as a whole is not a population at risk due to its minority or low-income population. A detailed evaluation of the economic composition of the communities in which the project is located is not required as part of the CEQA analysis. Instead, the physical changes are evaluated and the significance of them is noted with regard to social and economic aspects. Consideration was made for the potential impacts associated with the aesthetics of the project (see Section 4.1, Aesthetics). See Section 2.5.4, Electric and Magnetic Fields, for a discussion of EMFs.
- 248-18:** As documented in the Alternatives Screening Report and Addendum (Appendix D), the CPUC analyzed 32 alternatives to the Alberhill Systems Project and 14 alternatives to the Valley-Ivyglen Subtransmission Line Project. Of these alternatives, the CPUC carried forward 2 alternatives to the Alberhill System Project and 5 alternatives to the Valley-Ivyglen Subtransmission Line Project. A number of alternatives included undergrounding; however, note that CEQA requires that impacts on all resources be analyzed, and in some cases, undergrounding alternatives may result in reduced aesthetic impacts at the expense of greater impacts on other resource areas. Due to the volume of comments related to undergrounding, the CPUC reviewed the alternatives analyses in Chapter 5 during preparation of the FEIR, and upon closer examination, determined that none of the alternatives carried forward for analysis would be considered environmentally superior to the proposed project; however, mitigation has been required in cases where impacts on the environment were identified in Chapter 4.
- 248-19:** The analysis for the Valley-Ivyglen Subtransmission Line Project has been prepared in response to an amended Petition for Modification of a previously approved project. The commenter correctly asserts that many alternatives to both the original project design and the modified project design have been analyzed by the CPUC. In particular, the commenter mentions the “Northern Corridor” alternative, which was analyzed and eliminated during the

previous CEQA review. This route was eliminated for, among other reasons, failing to reduce aesthetic impacts. Given that the commenter's principle concern is aesthetics, the CPUC notes that the "Northern Corridor" alternative would merely shift any aesthetic impacts alleged by the commenter onto different receptors. Given that impacts associated with the Lake Elsinore commercial area, represented in Key Viewpoint 8, would be less than significant without mitigation and considering that the "Northern Corridor" was previously eliminated for failing to reduce aesthetic impacts, as well as for technical considerations, the CPUC declines to add this previously eliminated alternative to the current analysis for the modified project.

With respect to the commenter's statements about Lake Street, mitigation is considered adequate to reduce this impact to less than significant; however, the following language has been added to Mitigation Measure (MM) AES-4: "SCE shall coordinate with the City of Lake Elsinore prior to finalizing landscaping design. SCE shall submit the design to the CPUC, along with evidence that SCE has coordinated with the City of Lake Elsinore, prior to pole erection along Lake Street." Therefore, the City of Lake Elsinore would be consulted during the landscaping design for Lake Street. Impacts would remain less than significant.

- 248-20:** The DEIR in its entirety, including Appendix B, was posted on the CPUC's website in April 2016. Note that Appendix B contains ten separate files, all of which are located on the CPUC's website. Note that the reference to Appendix B in Chapter 5, Comparison of Alternatives, is intended to demonstrate that undergrounding activities have the greatest emissions. Appendix B does not include detailed emissions estimates for the alternatives. CEQA does not require that the analysis of alternatives be as detailed as the proposed project. Therefore, Chapter 5 provides a more qualitative analysis than what was provided for the proposed project. See response to comment 248-18.
- 248-21:** See response to comment 248-20.
- 248-22:** Note that land use conflicts in and of themselves do not result in a physical impact on the environment. Therefore, the analysis is correct as written. See response to comment 108-9.
- 248-23:** Comment noted. DEIR text revised.
- 248-24:** Comment noted.
- 248-25:** Visual simulations depicting the substation are included in Section, 4.1, Aesthetics. The commenter has not provided comments on the adequacy of the simulations. Therefore, no further response is required.
- 248-26:** Per responses 248-2 through 248-25, the commenter has not demonstrated a deficiency in the analysis of the EIR. Therefore, recirculation is not required.
- 248-27:** See responses to comment 248-2 through 248-26.

City of Moreno Valley, Community Development Department (Letter # 33)

- 33-1:** Your comment has become a part of the official record for this project. No further response is necessary as this comment does not raise issues related to the adequacy of the environmental impact analysis in the Draft EIR.
- 33-2:** The City of Moreno Valley has been added to the mailing list to receive future notifications related to the proposed project.

City of Wildomar (Letter # 377)

- 377-1:** Comment noted.
- 377-2:** Fire insurance costs are not a CEQA issue and therefore are not considered in then DEIR.
- 377-3:** At present, the CPUC does not consider EMFs, in the context of the CEQA, to be an environmental impact because there is no agreement among scientists that EMFs create a potential health risk and because CEQA does not define or adopt standards for defining any potential risk from EMFs. Therefore, EMFs are not addressed in Chapter 4. For the CPUC's position on EMF's, see Section 2.5.4, Electric and Magnetic Fields.
- 377-4:** The portion of the route identified by the commenter, located along Mission Trail, is included in Segment ASP 4. Key Viewpoint 13 provides a simulation within this segment. Although the simulation is located outside of the City of Menifee's boundaries and within the City of Lake Elsinore, the views are considered representative of views along this segment of the route. Further, note that work along Mission Trail within the City of Menifee includes the replacement of the existing Elsinore-Skylark 115-kV line with a new double-circuit line. Replacement of the existing 115-kV line with a new double-circuit line would represent an incremental change as described Section 4.1, Aesthetics, in reference to Key Viewpoint 13. Therefore, impacts would not be considered significant, and no changes have been made to the text.
- 377-5:** Although CPUC authority pre-empts local discretionary approvals, the applicant will nonetheless be required to acquire and comply with the requirements of ministerial permits, such as a City encroachment permit for any work within the City of Wildomar's rights-of-way (ROW).
- 377-6:** Regarding transportation and traffic impacts, refer to Section 4.15, Transportation and Traffic. The regulatory setting governing transportation and traffic at the State, Federal, and Local levels is discussed in Sections 4.15.2.1 through 4.15.2.3. The City of Wildomar's relevant transportation policies are discussed in Table 4.15-9, Relevant Transportation Policies and Ordinances. Pursuant to Table 4.15-9, permits will be required before excavation or installation of utilities in a public street or right-of-way. Moreover, permits will be required for operation of a vehicle on City roads of size or weight of vehicle or load exceeding the maximum specified in the California Vehicle Code.

- 377-7:** Given that the city limits of other cities in the vicinity are not included on the figure, the CPUC declines to add the City of Wildomar's city limits to the figure. Although the CPUC pre-empts local jurisdiction, the CPUC notes that a portion of the Trail is located in the City of Wildomar. A discussion of the City of Wildomar's zoning regulations is discussed in Section 4.10.2.3.
- 377-8:** The City of Wildomar's construction noise restrictions were added to MM NV-1 Construction Noise Reduction Measures pursuant to the City's Municipal Code.
- 377-9:** See revised Figure 2-4.
- 377-10:** Your opposition to aboveground transmission lines has been noted. See Section 4.1, Aesthetics, for a description of impacts related to views in the project area.
- 377-11:** Although some poles would be taller, self-weathering poles would be sufficient to reduce the impact to less than significant in this area. Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

#### **Bay Area Municipal Transmission Group (BAMx) (Letter # 47)**

- 47-1:** Comment noted.
- 47-2:** Comment noted.
- 47-3:** Your comment has been included in the public record and will be taken into consideration by decision-makers during consideration of the proposed project.
- 47-4:** The commenters preliminary statements and summaries of background information related to the proposed project have been included in the public record and will be taken into consideration by decision-makers during their consideration of the proposed project.
- 47-5:** See Appendix K regarding the alternatives selection process and the project objectives for the Alberhill System Project.
- 47-6:** See Appendix K regarding load forecasting and methodology. In addition, see portions of Appendix K related to constraints associated with the Valley Substation.
- 47-7:** See response to comment 99-9.
- 47-8:** The Valley South 115-kV system was modeled in great detail, including all substations, transmission lines, delivery points, loads, generation, capacitors, etc. The models were used to determine line and transformer overload, low voltage, and the adequacy of proposed solutions and alternatives. Importantly, because the Valley South system is considered radial, it is not subject to CAISO jurisdiction. See response to comment 47-10 regarding the Valley North system.

- 47-9:** See Appendix K. Alternatives that do not meet the project objectives were eliminated. Therefore, a detailed review of their environmental impacts is not required.
- 47-10:** The Valley South and Valley North systems operate independently. Therefore, while it appears possible to isolate portions of the Valley South load by reconnecting lines at the Valley Substation and opening lines in the Valley South area, this arrangement would remove lines from service to the Valley South system and increase the chance of load dropping during outages, overloading of lines and transformers, and low voltages within the system. As a result, additional reinforcement at the Valley North system would be required. Therefore, it is not feasible to transfer load to the Valley North System. Modeling the Valley North System is not required.
- 47-11:** The independent operation of the Valley North and Valley South system provide greater reliability and voltage control to both systems. Connecting the two systems would increase overloading during faults to such an extent that circuit breakers would not interrupt short circuits without damage to equipment, and the possibility of fire or explosions. See response to comment 47-10.
- 47-12:** See Appendix K and response to comment 47-13.
- 47-13:** See Appendix K, which explains that the lack of space at the Valley Substation is related not only to land surface for the transformer but to congested corridors in the surrounding area. Also, note that expanding the Valley Substation would not meet the project objectives.
- 47-14:** Your comment has been included in the public record and will be taken into consideration by decision-makers during consideration of the proposed project.

#### [Pechanga Band of Luiseño Indians \(Letter # 109\)](#)

- 109-1:** The CPUC acknowledges receipt of the Tribe's comments.
- 109-2:** The Tribe is included on the distribution list for the environmental review for the proposed projects.
- 109-3:** Note that Project Commitments have been proposed by the applicant and are not subject to modification by the CPUC except via introduction of mitigation measures where a significant impact has been identified.

The CPUC acknowledges the Tribe's concerns regarding traditional cultural properties in the project area. See the revised cultural mitigation measures, which would reduce impacts on identified cultural resources (see Tables 4.5-1, 4.5-2, 4.5-3, 4.5-4, and 4.5-5). These mitigation measures may also have the incidental effect of mitigating, to some extent, impacts on Assembly Bill (AB) 52 resources. AB 52 resources cannot be treated as impacts in this EIR due to the NOP for these projects having been published in May 2015 (see response to comment 109-4), and therefore, mitigation for AB 52 resources is not required.

The CPUC also notes the Tribe's concerns regarding monitoring requirements. Regarding payment for Tribal monitors, the concern has been noted and forwarded to the applicant for their consideration. See responses to comment 109-4 through 109-13.

- 109-4:** Note that California AB 52 requires that state and local agencies consult with Native American tribes for projects within NOPs published in July 2015 or later. The NOP for the proposed projects was published in May 2015, and therefore, AB 52 requirements related to consultation do not apply. Notwithstanding that compliance with AB 52 is not required for the Project based on the date of its NOP, the CPUC has nevertheless consulted with the Pechanga Tribe throughout the preparation of the Draft EIR and the Final EIR. Mitigation measures to reduce impacts on resources identified in the Draft EIR have been revised with further input from the Tribe and are included in the Final EIR.
- 109-5:** See response to comment 109-4. Note that although California AB 52 does not apply to this project, the EIR nonetheless includes information on AB 52 (see Footnote No. 3 in Section 4.5). In addition, although the CPUC cannot treat certain tribal sites as resources under pre-AB 52 law, the CPUC has nonetheless included information in the EIR regarding AB 52 resources and has included a draft visual study to document views from and to tribal resources for the Tribe's information (Appendix I). The report was not completed due to lack of Tribal input. As described in response to comment 109-3, the existing mitigation measures in the section, which have been updated with input from the Tribe, would reduce impacts on eligible and potentially eligible resources identified in the DEIR and may have the incidental effect of reducing impacts on some AB 52 resources.
- 109-6:** As the Tribe is aware, in addition to previous consultations during preliminary review of the projects, the CPUC has consulted with the Pechanga Tribe during the preparation of this Final EIR, the original EIR for the Valley-Ivyglen Subtransmission Line Project, and the combined Valley-Ivyglen Subtransmission Line Project and the Alberhill System Project Draft EIR. The CPUC acknowledges the Tribe's position regarding the cultural sensitivity of lands within the project area and their position regarding MLD status. See response to comment 109-4.
- 109-7:** The Tribe's neutrality with respect to the proposed projects has been noted and will be taken into account by decision-makers. Revised mitigation measures developed with input from the Pechanga Tribe are included in Section 4.5, Cultural Resources.
- 109-8:** See response to comment 109-3.
- 109-9:** Revised mitigation measures have been developed with input from the Pechanga Tribe and are included in Section 4.5, Cultural Resources.
- 109-10:** See response to comment 109-9.
- 109-11:** See response to comment 109-3 and 109-9.
- 109-12:** See response to comment 109-4, 109-6, and 109-9.
- 109-13:** See response to comment 109-4, 109-6, and 109-9.

**109-14:** See response to comment 109-4, 109-6, and 109-9.

**Crosbie Gliner Shiffman Southard & Swanson LLP (CGS3) (Letter # 108)**

**108-1:** Comment noted.

**108-2:** Comment noted.

**108-3:** First, under CEQA, the lead agency may, but is not required, to conduct scoping meetings with the public prior to completion of the DEIR (see CEQA Guidelines, § 15083.) Second, under CEQA, the lead agency is required to give certain notices at specified times, but none of the applicable notice requirements are triggered by the identification or addition of a new alternative at any stage in the process, except when the addition of significant new information added to the EIR after issuance of the DEIR requires recirculation. When an agency makes the initial decision to prepare an EIR, the lead agency must provide a NOP to specified agencies (Pub. Resources Code Section 21080.4(a); CEQA Guidelines Section 15082). Notice must also be given to any person who has filed a written request for notices with the clerk of the lead agency's governing body (here, the CPUC) or with the person designated by the governing body to receive such requests (Pub. Resources Code, § 21092.2). However, there is no requirement that these notices identify the project alternatives under consideration. When the DEIR is complete, the lead agency must provide a Notice of Availability to notify the public that the document is ready for public review and must provide a Notice of Completion to the Office of Planning and Research. (CEQA Guidelines Section 15087.) The CPUC timely provided all of the notices identified above and therefore, did not fail to timely provide any of the required notices to the commenter.

**108-4:** The commenter claims that neither the Alternative Screening Report, Addendum, nor the DEIR explain why Alternative DD was selected for consideration. CEQA does not expressly require or include standards for preparation of an Alternatives Screening Report so no CEQA claim can be based on the alleged inadequacy of such a report. That leaves the question of whether the DEIR complied with the requirements, if any, for identifying the rationale for selection of Alternative DD. CEQA Guidelines Section 15126.6(a) requires the lead agency to “publicly disclose its reasoning for selecting the [range of project alternatives for examination].” Section 15126.6(c) requires the EIR to “briefly describe the rationale for selecting the alternatives to be discussed” and “also identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency’s determination.” It further provides that “[a]dditional information explaining the choice of alternatives may be included in the administrative record.” Neither the text of these provisions nor case law interpreting them require a detailed rationale for selection of each individual alternative either in the EIR or in any additional information supporting the selection of alternatives (e.g., an Alternatives Screening Report). The Alternatives Screening Report and Addendum are included in Appendix D of the EIR. For this reason, the Alternatives Screening Report and Addendum, as part of the EIR, meet the requirement that the EIR provide the rationale for selecting the alternatives ultimately discussed in the EIR as required in Sections 15126.6(a) and (c).

**108-5:** The commenter’s claim that the analysis for Alternative DD in Chapter 6.0, Comparison of Alternatives, is not supported by substantial evidence has been noted and will be taken into account by decision-makers. However, note that the analysis for Alternative DD has been

revised during the course of the preparation of this Final EIR based on comments received from other commenters. In particular, per response to comments 4-22 and 4-23, Alternative DD is no longer considered the Environmentally Superior Alternative.

- 108-6:** Note that Table 5-2 has been substantially revised. Per Public Resources Code Section 21002, alternatives must avoid or substantially reduce at least one significant effect of the proposed project; however, CEQA does not specify whether the alternatives must focus on effects that are significant prior to incorporation of mitigation or are significant and unavoidable with implementation of mitigation. See responses to comments 108-5, 4-22, and 4-23.
- 108-7:** See responses to comment 108-6, 4-22, and 4-23.
- 108-8:** The conclusions related to aesthetic impacts in the Alternative DD analysis in Chapter 5.0, Comparison of Alternatives, has been revised based on information received from commenters during the public review period for the DEIR. The EIR now discloses that Alternative DD would have greater aesthetic impacts than the proposed project. Further see responses to comments 108-6, 4-22, and 4-23.
- 108-9:** The threshold issue to be considered before specifically evaluating the merits of the commenter's arguments (and those raised by their environmental consultant) is whether Alternative DD's inconsistency with the Serrano Specific Plan – which is a theoretical land use conflict – would result in any physical environmental impact. Note that the EIR is only required to analyze the impacts of theoretical land use conflicts if those conflicts result in physical environmental impacts. An example of a physical environmental impact resulting from a project's inconsistency with a land use designation would be where a transmission line was to be sited in an area zoned for required low income housing, thus necessitating relocation of that housing, which would in turn generate physical environmental impacts at that new location. By contrast, the environmental impacts associated with the construction of the substation on the Serrano Commerce Center Site would be environmental impacts generated by the physical construction activity, not by a theoretical conflict with a City's or developer's desire or intention to make alternative use of a site.

Therefore, the operative question is whether or not siting of the substation on the Serrano Commerce Site would (a) result in displacement of development that would need to be relocated because it is mandated under federal, state, or local law or (b) generate some other environmental impact due to rendering the site unavailable for developing it in accordance with the Serrano Specific Plan. With respect to criterion (a), the CPUC notes that the development included in the Serrano Specific Plan is not mandated under law, and therefore, it would not need to be relocated. With respect to criterion (b), although siting the Alternative DD substation on the Serrano Commerce Center site would restrict some of the land available for development, it would not render the site unavailable for development, and development could still generally proceed in the manner specified in Riverside County Specific Plan 353. Therefore, comments associated with whether or not the location of the Alternative DD substation would affect the integrity of the Serrano Specific Plan need not be addressed further.

- 108-10:** A discussion of the impacts related to existing mining operations on the Serrano Commerce Center site have been added to the analysis for Alternative DD in Chapter 5.0, Comparison of Alternatives. Note that the identification of greater impacts related to Alternative DD, or to any alternative analyzed in Chapter 5, are not impacts of the proposed project and are based on

generally qualitative information. Therefore, the identification of greater impacts associated with the alternatives are not considered significant new information and would not require recirculation.

- 108-11:** The extension of Temescal Canyon Road, which was included in the Serrano Specific Plan, has been incorporated into the description of Alternative DD. If Alternative DD is selected, Temescal Canyon Road would be extended and follow the same route identified in Riverside County Specific Plan 353. See revisions to the Alternative DD description in Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives.
- 108-12:** See response to comment 108-9.
- 108-13:** See responses to comment 108-3 through 108-11.
- 108-14:** The expertise of L&L Environmental with respect to the Serrano Commerce Center and the development of Riverside County Specific Plan 353 has been noted and will be taken into account by decision-makers.
- 108-15:** The expertise of L&L Environmental with respect to other projects in the vicinity or on the Alternative DD site has been noted and will be taken into account by decision-makers.
- 108-16:** See responses to comment 108-17 through 108-41.
- 108-17:** The commenter has provided introductory information about the Serrano Specific Plan. These statements are included in the public record and will be taken into account by decision-makers when they consider the proposed projects.
- 108-18:** The commenter has provided general statements about the Serrano Specific Plan entitlements. These statements are included in the public record and will be taken into account by decision-makers when they consider the proposed projects.
- 108-19:** See response to comment 108-9.
- 108-20:** See response to comment 108-9.
- 108-21:** See response to comment 108-9.
- 108-22:** See response to comment 108-9.
- 108-23:** See response to comment 108-9.
- 108-24:** See response to comment 108-9.
- 108-25:** Versatile fairy shrimp are listed as neither Endangered nor Threatened on the California Endangered Species list. Per statements made by the commenter, the other species have not been identified in any site surveys to date. Further, note that the applicant would obtain all

required permits prior to construction if Alternative DD is selected. Per response to comment 4-23, Alternative DD is no longer considered the Environmentally Superior Alternative.

**108-26:** See response to comment 108-9.

**108-27:** See response to comment 108-9.

**108-28:** Text has been added to Chapter 5.0, Comparison of Alternatives, to indicate that impacts on paleontological resources related to Alternative DD would be similar to the proposed project, and the same mitigation measures would apply.

**108-29:** Note that the purpose of Chapter 5.0, Comparison of Alternatives, is to compare the impacts of the alternatives. To the extent that various specifics have been omitted, it is assumed that impacts would be similar. The analysis of the proposed project includes an analysis of the resources specified by the commenter. Therefore, additional detail is not required for the Alternative DD analysis. Note that CEQA does not require that the alternatives analyses be as detailed as the proposed project.

**108-30:** See response to comment 108-9.

**108-31:** See responses to comments 108-9 and 108-29.

**108-32:** See response to comment 108-9.

**108-33:** See response to comment 108-9.

**108-34:** See response to comment 108-9.

**108-35:** See response to comment 108-9.

**108-36:** Comment noted.

**108-37:** See response to comment 108-9.

**108-38:** Per CEQA Guidelines Section 15131, an analysis of economic impacts is not required. See revised text in the Geology, Soils, and Mineral Resources section in the Alternative DD analysis in Chapter 5.0, Comparison of Alternatives, related to the loss of mineral resources. See also response to comment 108-9.

**108-39:** See response to comment 108-38.

**108-40:** See response to comment 108-38.

**108-41:** See response to comment 108-38.

**108-42:** The commenter's resume and qualifications are included in the record and will be taken into account by decision-makers.

**Diversified Pacific (Letter # 91)**

**91-1:** The CPUC acknowledges receipt of the attachments.

**91-2:** Comment noted.

**91-3:** Consideration was made for the potential impacts associated with the aesthetics of the project (see Section 4.1 Aesthetics, which includes representative views along I-15 near the communities described by the commenter). Per CEQA Guidelines Section 15131, CEQA does not require an analysis of economic impacts. See Section 2.5.4 Electric and Magnetic Fields for a discussion of EMFs.

**91-4:** As of the date of the NOP, the housing developments identified by the commenter had not yet been constructed. In addition, representative views along I-15 were already analyzed as part of VIG 7 in Section 4.1, Aesthetics. No significant impacts were identified in VIG 7. Therefore, undergrounding has not been recommended for this section.

**91-5:** The CPUC acknowledges receipt of the commenter's exhibits. VIG 6 and VIG 7 analyze impacts on representative views near the housing developments identified by the commenter. Therefore, impacts related to the commenter's tentative tract maps have generally already been analyzed in the EIR. As such, no updates have been made to the figures or text of the EIR.

**91-6:** See response to comment 91-5.

**91-7:** See response to comment 91-5.

**91-8:** See response to comment 91-5.

**91-9:** See response to comment 91-5.

**91-10:** See response to comment 91-5.

**91-11:** See response to comment 91-5.

**91-12:** Comment noted.

**91-13:** See response to comments 91-3 and 91-4.

**91-14:** See response to comments 91-3 and 91-4.

**91-15:** See response to comment 91-3.

**91-16:** See response to comment 91-4.

**91-17:** Comment noted.

**Forestar Toscana (Letter # 113)**

**113-1:** The CPUC acknowledges receipt of the commenter's letter.

**113-2:** The CPUC acknowledges the commenter's introductory statements. Your statements are included in the public record and will be taken into account by decision-makers.

**113-3:** See responses to comments 113-4 through 113-25.

**113-4:** The exact location of aboveground, temporary shoofly line (short-term) at the interface between line segment VIG 7 and VIG 8, as well as other short-term, construction-related project features will be determined during final engineering.

**113-5:** Comment noted. Note that Segment VIG 8 is proposed to be placed underground along Temescal Canyon Road.

**113-6:** The applicant would minimize impacts caused by the use of helicopters during construction by designating flight paths away from residential areas. In addition, helicopters would only be used during daylight hours consistent with applicable laws and regulations).

**113-7:** Upon consideration of cumulative impacts with the Nevada Hydro LEAPS project, Alternative DD is no longer considered the environmentally superior alternative. See Section 5.3.2 in Chapter 5.0, Comparison of Alternatives. In particular, refer to the subsection added to the EIR on "Cumulative Impacts." The Environmentally Superior Alternative is discussed in Section 5.3.4.

**113-8:** Upon consideration of Alternative DD with the Nevada Hydro LEAPS project in the cumulative analysis, Alternative DD is no longer considered the environmentally superior alternative. See Section 5.3.2 in Chapter 5.0, Comparison of Alternatives. The Environmentally Superior Alternative is discussed in Section 5.3.4.

**113-9:** See response to comment 113-8 above.

**113-10:** See response to comment 113-8 above.

**113-11:** See response to comment 113-8 above.

**113-12:** See response to comment 113-8 above.

**113-13:** See response to comment 113-8 above.

**113-14:** See response to comment 113-8 above.

**113-15:** See response to comment 113-8 above.

**113-16:** See response to comment 113-8 above.

**113-17:** See response to comment 113-8 above.

**113-18:** See response to comment 113-8 above.

**113-19:** See response to comment 113-8 above.

**113-20:** See response to comment 113-8 above.

**113-21:** See response to comment 113-8 above.

**113-22:** See response to comment 113-8 above.

**113-23:** Comment noted. See response to comment 113-8 above.

**113-24:** Comment noted.

**113-25:** No comment and no response needed.

**FRONTLINES (Forest Residents Opposing New Transmission Lines) (Letters # 51 and # 99)**

**51-1:** At the public meeting, the commenter submitted general reference materials consisting of photocopied excerpts of ALJ Decision 13-10-058, as well as excerpts of the Tehachapi Renewable Transmission Project (TRTP) FEIR. The photocopied pages from the Decision appear to focus on the Town of Acton’s mistaken impression that CEQA documentation is based on final engineering. The photocopied pages from the TRTP FEIR appear to include information related to an alternative for TRTP that required helicopter construction. It is unclear precisely what conclusion the commenter intends the CPUC to draw from this information; therefore, a detailed response cannot be provided. To the extent that the referenced material might have been intended to supplement Comment Letter 99, note that CEQA does not require that the lead agency respond to general reference materials cited to support comments (*Environmental Protection Information Center v. Dept. of Forestry & Fire Protection* (2008) 44 Ca.4th 459, 483–484). Regarding helicopters, see responses to comments 99-49, 99-58, 99-59, 99-60, 99-62, 99-64, 99-66, 99-67, 99-68, 99-69, 99-70, and 99-71.

**52-1:** At the public meeting, the commenter submitted general reference materials consisting of photocopied excerpts of Federal Energy Regulatory Commission (FERC) Docket No. RC15-1-000. The reference materials refer to a FERC decision related to whether FERC considers various 115-kV systems bulk transmission or distribution systems. The materials include reference to the Valley System. It is unclear precisely what conclusion the commenter intends the CPUC to draw from this information; therefore, a detailed response cannot be provided. To the extent that the referenced material might have been intended to supplement Comment Letter

99, note that CEQA does not require that the lead agency respond to general reference materials cited to support comments (*Environmental Protection Information Center v. Dept. of Forestry & Fire Protection* (2008) 44 Ca.4th 459, 483–484). Regarding the definitions of transmission lines, power lines, and distribution lines under the CPUC’s jurisdiction, refer to General Order 131-D.

**99-1:** Comment noted.

**99-2:** Comment noted.

**99-3:** Comment noted.

**99-4:** See response to comments 99-7 through 99-9.

**99-5:** Although the Valley-Ivyglen and Alberhill applications have been analyzed within one environmental review document, the applications are under separate consideration by the CPUC. The Valley-Ivyglen application could be approved separately without the Alberhill project and would be constructed ahead of the Alberhill Substation. The Valley-Ivyglen petition for modification is considered a modification of a previously approved project by the CPUC.

**99-6:** The CPUC, acting as lead agency for both the Alberhill and Valley-Ivyglen projects, in their discretion, “determined that it was in the public's best interest to consolidate the CEQA analyses for the Alberhill System Project CPCN application and the Valley-Ivyglen Subtransmission Line Project PFM for a perviously-approved PTC into a single CEQA document because the components of the proposed Valley-Ivyglen project are required for construction of the proposed Alberhill System Project and the two projects would be constructed during the same period” (Section 1.0, Introduction).

**99-7:** Demand projections made available during the course of the CEQA process provide rationale for the applicant’s stated project need. See responses to comments 99-8 and 99-9. See Appendix K.

**99-8:** A goal of the Alberhill project is to relieve projected electrical demand within the Electrical Needs Area (ENA) (see Section 1.2.2, Objectives of the Proposed Alberhill System Project). Pursuant to the revised Table 1-1 in Chapter 1 of the EIR, electrical demand increased from 2008 through 2016. Based on this updated data, the CPUC concurs with the applicant's estimates that demand will continue to increase through 2023 (see revisions to Section 1.1.1.4). Note that the Applicant's forecasts for peak electrical demand during a 1-in-5 year heat storm could increase to 1121 megavolt amperes (MVA) by 2019, exceeding the operating limit of the Valley South system (Id.). Therefore, SCE's projections are sufficient to establish the need for the proposed projects.

**99-9:** See response to comment 99-8. In addition, the commenter lists various goals and measures from County planning documents. Note that the energy efficiency goals and objectives discussed in these documents, do not establish a lack of need for either the Alberhill or Valley-Ivyglen projects. Such programs are by their nature speculative, and are therefore inadequate for transmission planning purposes. The goals and objectives listed by the commenter indicate the local agencies' attempts to introduce energy efficiency measures; however, goals and

objectives are no guarantee that such measures will be implemented. Therefore, while it's likely that some measures will result in reduced energy consumption, for the purposes of energy planning, SCE has based their calculations on the historical Valley South system peak demand and calculated future peak demand levels based on these historical trends. In addition, note that greater line losses occur when energy is transported over large distances, requiring the generation and purchase of additional energy supplies to offset lines losses. This results in the inefficient transport of power. Therefore, efficient and reliable transmission of electricity requires decentralization.

- 99-10:** See responses to comments 99-11 through 99-16.
- 99-11:** The purpose of the Alberhill System Project is to relieve projected electrical demand that would exceed the operating limit of the two load-serving Valley South 115-kV System 500/115-kV transformers by constructing a new 500/115-kV substation within the Electrical Needs Area. See Appendix K, which includes updated load forecasts from the Applicant that support their original assertion that electrical demand continues to rise in spite of a 2008 decrease attributable to the financial crisis. By 2020, the projected peak demand during a 1-in-5 year heat storm would exceed the operating limit of the system. As such, while it appears that the alternatives screening process favored substation alternatives, no non-substation alternative was identified that would relieve projected electrical demand in the ENA as further detailed in Appendix K.
- 99-12:** The purpose of the Alberhill System Project is to relieve projected electrical demand that would exceed the operating limit of the two load-serving Valley South 115-kV System 500/115-kV transformers by constructing a new 500/115-kV substation within the Electrical Needs Area. Pursuant to the Applicant's peak projections, corroborated by the projections of independent electrical engineers, the projected peak demand in a 1-in-5 year heat storm could reach 1229MVA by 2026. Moreover, the population of Riverside County is expected to more than double by 2035, with the City of Lake Elsinore growing by approximately 80%. Therefore, the proposed project is expected to relieve this growing electrical demand rather than current demand levels.
- 99-13:** The commenter claims that there is an existing line that connects Newcomb and Skylark Substations. Note that the current connection consists of a three terminal line, radiating off of the same tap. The tap provides a connection between Valley, Newcomb, and Skylark Substations but does not connect them directly. The proposed project would reconfigure these lines to place both the Newcomb and Skylark Substations within the new Alberhill System and remove them from the Valley South System. The line from the Newcomb Substation to the existing tap would remain in place but would not be used during normal conditions. The existing line at the Skylark Substation would be reconfigured to connect to Tenaja Substation. Therefore, a new line would be constructed that would connect Newcomb and Skylark.
- 99-14:** The commenter asserts that the inclusion of an additional 115-kV line between Skylark and Alberhill is not necessary because the Alberhill System Project is not necessary. See Appendix K, which includes updated load forecasts and a detailed description of the applicant's stated project need, as well as a description of extensive constraints in the project area.
- 99-15:** See responses to comments 99-11 and 99-12 regarding the need for the proposed Alberhill System Project as well as the documentary support for the applicant's stated project need

included in Appendix K. With regard to the impacts associated with the proposed Alberhill project, See the DEIR's discussion of environmental impacts.

- 99-16:** The commenter refers to the CAISO analysis of the Alberhill System Project in 2009. The CPUC's EIR is based on an independent analysis of more recent information. See Appendix K for a detailed explanation of the applicant's stated need for the project, as well as a description of extensive constraints in the project area.
- 99-17:** See Appendix K regarding the applicant's stated need for the Valley-Ivyglen Subtransmission Line Project. Note that the need for the Valley-Ivyglen Subtransmission Line Project was established as part of the previous environmental review process, and this project was previously approved by the Commission. Note that all Alberhill System Project load forecasts assume the construction of the Valley-Ivyglen Subtransmission Line, and an independent analysis of the load forecasts appears to support SCE's claim that load is increasing in the ENA.
- 99-18:** See Appendix K and response to comment 99-11.
- 99-19:** See Appendix K and response to comment 99-17.
- 99-20:** See Appendix K and response to comment 99-17.
- 99-21:** The purpose of the Alberhill System Project is to relieve projected electrical demand that would exceed the operating limit of the two load-serving Valley South 115-kV System 500/115-kV transformers by constructing a new 500/115-kV substation within the Electrical Needs Area. For more detail on the applicant's project need, load forecasts, and alternatives screening, see Appendix K. Note that updated load forecasts support the Applicant's assertion that electrical demand continues to rise in spite of a 2008 decrease attributable to the financial crisis. By 2020, the projected peak demand during a 1-in-5 year heat storm would exceed the operating limit of the system. As such, while it appears that the alternatives screening process favored substation alternatives, no non-substation alternative was identified that would relieve projected electrical demand in the ENA.
- 99-22:** See response to comment 99-21. Appendix K describes the CPUC's project objectives and alternatives screening methodology.
- 99-23:** See response to comment 99-21.
- 99-24:** See response to comment 99-21.
- 99-25:** See response to comment 99-21.
- 99-26:** The comment refers to Alternative F but references text from Alternative E. Note that the error cited by the commenter regarding Alternative E has been corrected in the Alternatives Screening Report. Alternative E would not meet the projected electrical need, and therefore it would not meet any of the project objectives. Alternative F would also not meet the project objectives as described in the Alternatives Screening Report. It would not meet the projected

electrical need within the planning period, thus requiring a similar project prior to 2023. See Appendix K.

- 99-27:** See Appendix K. A range of both substation and nonsubstation alternatives were analyzed in the EIR. None of the nonsubstation alternatives would meet the project objectives and therefore were not carried forward for analysis in the EIR.
- 99-28:** The commenter is correct that a 115-kV transmission network is required to support a 500-kV/115-kV substation. The Alberhill System Project reconfigures the existing system such that two separate systems (the Alberhill System and the Valley South System) would be created. To accomplish this, the proposed ASP removes certain substations from the Valley South System and places them on the reconfigured Alberhill System. Note that even without a new substation, it is not possible to serve the existing Valley South System without the construction of new 115-kV lines. Even if it was possible to continue indefinitely bringing additional power into the Valley Substation, the existing 115-kV lines that comprise the Valley South System would eventually be overloaded. Therefore, Alternative E includes the construction of new subtransmission lines. See Appendix K.
- 99-29:** For a discussion of the applicant’s stated need for the Alberhill System Project and the CPUC’s alternatives screening process, including a detailed discussion of the Valley South alternative, see Appendix K. Alternative E was eliminated from further consideration for failing to meet the project objectives. See response to comment 99-28.
- 99-30:** The commenter appears to confuse electrical line capacity with operational capacity. Electrical line capacity relates to the amount of electricity that can flow through a given line at a given time. Operational capacity, however, is the amount of electrical load that can be safely served by the equipment. Operating limits are established to ensure that capacity and system operational flexibility are maintained to safely and reliably meet projected peak electrical demands during periods of extreme heat, under both normal and abnormal conditions. The Valley South System is not sufficient to accommodate future electrical demand, but the transmission lines between Skylark and South are sufficient to carry the current—rather than future—electrical load.
- 99-31:** For a discussion of the applicant’s stated need for the Alberhill System Project and Valley-Ivyglen Subtransmission Line Project, see Appendix K. Appendix K includes an in-depth discussion of load forecasting, the methodologies used for load forecasting, and independently corroborated results.
- 99-32:** For a discussion of the applicant’s stated need for the Alberhill System Project and the CPUC’s alternatives selection process, see Appendix K.
- 99-33:** For a discussion of the applicant’s stated need for the Alberhill System Project and the CPUC’s alternative selection process, see Appendix K. Note that the non-substation alternatives analyzed in the EIR would not meet the project objectives. Therefore, a detailed environmental analysis of non-substation alternatives is not required. Also, see response to comment 99-28.
- 99-34:** The commenter incorrectly states CEQA’s “substantial evidence” standard (see CEQA, Section 153841). See also Appendix K and response to comment 99-28.

- 99-35:** The Commission approved the Valley-Ivyglen project on August 12, 2010, under filing Decision 10-08-009. Under consideration is the applicant's Petition for Modification to construct the Valley-Ivyglen subtransmission line that reopened SCE's application for the proposed Valley-Ivyglen project. See Appendix K for an explanation of the applicant's stated need for the Valley-Ivyglen Subtransmission Line Project.
- 99-36:** Your statement is part of the official record and will be taken into account by decision-makers.
- 99-37:** Comment noted. See response to comment 99-11. Western Energy Coordinating Council (WECC) and North American Electric Reliability Corporation (NERC) planning criteria requires the provision of continuous service during an outage of any one line or transformer. Adding additional capacity at the Valley Substation will not mitigate against outages in the Valley South 115-kV system and therefore fails meet this requirement. In addition, rebuilding the substation would not relieve corridor constraints near the substation. For a further discussion of the applicant's stated need for the project, See Appendix K.
- 99-38:** See responses to comment 99-38 through 99-46.
- 99-39:** FRONTLINE's recommended alternative is a routing alternative for the approved Valley Ivyglen 115-kV line. This alternative may reduce the right-of-way expansion needs. However, the total capacity added would be less, resulting in reduced 115-kV capacity at the Alberhill Substation. As a result, the 500/115-kV transformer could not be fully utilized, which would necessitate that additional 115-kV capacity be included in the Alberhill System Project. Moreover, this would result in a decrease in backup capacity for a transformer loss at the Valley Substation.
- In addition, the proposed rebuild locations are within congested areas with several power lines and would result in difficult construction. Considering that the Valley-Ivyglen Subtransmission Line Project has been previously approved, and the CPUC is responding to an amended Petition for Modification of a previously approved project for which the applicant has provided data for their stated need for the project (see Appendix K), the EIR's focus on routing variations is considered adequate.
- 99-40:** Double-circuit lines have a total of six conductors, comprising two different transmission circuits. Both circuits are mounted or run through the same transmission line (i.e., are collocated on the same set of structures). As such, use of double-circuit transmission lines do not reduce reliability concerns in the event of a failure at any of the transmission towers. If a transmission tower were to fail under this configuration, both lines would go out, which defeats the purpose of the redundant circuit.
- 99-41:** See response to comment 99-40.
- 99-42:** See response to comment 99-40.
- 99-43:** See response to 99-49.

- 99-44:** Reconductoring may increase capacity in some instances; however, differential wire tensions would require that some structures be modified or rebuilt. In any case, the capacity added would be less than the capacity provided by the new Valley-Ivyglen 115-kV line, which would require that additional capacity be included in the Alberhill System Project. Therefore, cumulatively, the impacts would be greater. Additionally, the corridors leaving the Valley Substation are congested, and maintaining service during re-construction would be complicated. Finally, using fewer high capacity lines would still result in overloads and voltage violations during outages.
- 99-45:** See response to comment 99-40.
- 99-46:** Although the Valley-Ivyglen Subtransmission Line is required for the construction of the Alberhill Substation, the Valley-Ivyglen Subtransmission Line has independent utility. The projects have been combined into one environmental document at the CPUC's discretion, but the applications will be approved or rejected independently. Therefore, combined alternatives do not meet the project objectives and have not been considered in the EIR.
- 99-47:** See response to comment 99-46.
- 99-48:** See response to comment 99-46.
- 99-49:** Note that although the CPUC previously approved a project design for the Valley-Ivyglen project that did not include helicopter usage, during final engineering of the previous iteration of the project design, SCE determined that helicopters were necessary in order to construct the project. The CPUC expects that SCE would not use helicopters in areas that are easily accessible along existing roadways due to cost considerations unless necessary.
- 99-50:** See response to comment 99-49.
- 99-51:** See response to comment 99-49.
- 99-52:** See response to comment 99-49.
- 99-53:** See response to comment 99-49.
- 99-54:** See response to comment 99-49.
- 99-55:** See response to comment 99-49.
- 99-56:** See response to comment 99-49.
- 99-57:** See response to comment 99-49.
- 99-58:** Note that conditions vary along the routes and that there is no guarantee that it would be feasible to access certain portions of the route merely because the applicant has determined that helicopters are not required in other areas. In fact, some portions of the route span slopes or

other areas where it would be infeasible to conduct certain activities. Note also that the placement of equipment required for conductor pulling differs from the placement of equipment required for component construction, such as pole or tower erection. Therefore, there is no guarantee that areas surrounding the existing road network could be used for conductor pulling merely because a pole or tower could be constructed in a particular location using areas adjacent to an existing road.

- 99-59:** The applicant has provided estimates of helicopter use to the CPUC for the purpose of this review. If the applicant requires greater helicopter usage than what is assumed in the EIR then the CPUC would review and approve a Minor Project Refinement to ensure that there would be no increase in the severity of the impact. If the impact would be severely increased, then additional CEQA review may be required. See response to comments 99-60 through 9-72.
- 99-60:** The commenter cites a helicopter incident that occurred during construction of another project. See MM TT-4, which would require a Helicopter Lift Plan, which would reduce impacts related to helicopter safety to less than significant.
- 99-61:** Comment noted.
- 99-62:** Given that helicopter landing and takeoff activities would be short-term and occur on paved areas and given the low number of reported cases of Valley Fever in this area, sensitive receptors are unlikely to contract the disease from dust generated by helicopters. Implementation of dust control measures during construction would reduce potential fugitive dust dispersion to a less than significant level (see DEIR Section 4.3.4.1 - Project Commitment J: Air Emissions Controls). In addition, MM AQ-3 would further reduce this already less than significant impact. Edits have been incorporated into Sections 4.3.1.3, 4.3.4.2 and 4.3.5.2 of the DEIR.
- 99-63:** Comment noted. See response to comment 99-60.
- 99-64:** Comment noted. As stated under Section 4.11.4.2, Impacts Analysis (Valley-Ivyglen Subtransmission Line Project), under Impact NV-1 (VIG), project noise associated with construction would occur at every proposed structure location, in part due to helicopter usage. The analysis further acknowledges under Impact NV-4 (VIG) that impacts would also occur along flight paths proximate to staging areas (thereby not solely at the individual staging areas). The analysis includes a number of statements showing the types of helicopters that would be used and the potential sound levels associated with their usage (approximately 82.3 dBA at a level fly over of 500 feet and 130 mph).

While impacts are unavoidable and may exceed 75 dBA, construction is temporary, and the use of helicopters would be intermittent throughout the construction process. Therefore, sensitive receptors would not be subject to a continuous noise level exceeding 75dBA. Project Commitment H also limits the time in which construction may occur and thereby combined with the general decentralized nature of construction, not all receptors would be subject to construction noise for the duration of the 28-month period of activity.

- 99-65:** See response to comment 99-64.

**99-66:** Comment noted. As noted in Section 4.11, helicopters would increase ambient noise levels by 10 dBA or more during landing/take-off operations at staging areas, and when flying over residential areas at a height of 500 feet. Impacts from helicopters would be temporary, but significant and unavoidable. As stated, the use of helicopters also would be limited to typical construction hours/days.

**99-67:** As shown in the Project Description, Section 2.4.5.2, light-duty helicopters may be used along 115-kV Segments VIG1 to VIG6 for materials delivery, hardware installation, and wire stringing. Most VIG segments are accessible from public roadways and would not require the use of helicopters to “deliver” workers. Heavy-duty helicopters would not be used for construction of the proposed Valley–Ivyglen Subtransmission Line Project.

As stated in Section 2.4.5.5, helicopters could be used for the delivery of materials, equipment, and workers for the 500-kV Tower Construction (Alberhill System Project).

**99-68:** It is noted under Impact NV-4 (VIG) that the light duty helicopters used during construction of the Valley-Ivyglen Subtransmission Line Project may result in significant and unavoidable impact for sensitive receptors located along the flight paths in the proximity of staging areas. In order to address these issues, the applicant would implement Project Commitment H. Project Commitment H requires limiting construction hours, utilizing noise reduction modalities, and notification of sensitive receptors prior to construction begins.

Likewise, the Alberhill System Project may require use of medium or heavy duty helicopters during the construction period, which would result in significant and unavoidable impacts with respect to noise. However, the applicant would limit takeoff and landing to established helicopter landing areas or at staging areas ASP1 and ASP3. Further, best management practices would be used to limit noise impacts.

Therefore, it is true that helicopter use may result in significant and unavoidable impacts. However, given that the terrain of the projects may require use of helicopters, it was determined that while this impact is significant and unavoidable, it will be taken into consideration by the decision makers.

**99-69:** Ortega High School is located on Chaney Street/Education Way near the VIG4 Segment and the new part of the Alberhill System Project. Education buildings on Education Way are noted in Table 4.11-4/Table 4.11-15 and are noted for being located within 71 feet of a project component. This table, and others like it, only detail the closest receptor. Therefore, while not always explicit, all types of receptors are evaluated despite only the closest being listed.

Table 4.11-12 provides a listing of receptors specifically located in Lake Elsinore. They are located at a range of distances from a project component. In this manner, one can get a sense of what the noise level would be when proximate to a project component during construction.

Helicopter usage is discussed throughout the section and is noted as being larger when proximate to a take-off/landing area or within a location in which construction by helicopter is occurring. As stated in Section 4.11, impacts would be temporary and significant and unavoidable for those sensitive receptors located along the flight paths in the proximity to staging areas.

**99-70:** As is discussed under Impact NV-4 (VIG), “While flying above residential areas, helicopter operations have the potential to create a temporary but noticeable increase above ambient noise levels; however, it is anticipated that most of the noise effects associated with helicopter use would occur at those receptors located in the vicinity of staging areas, since these areas would be used for landing and take-off at a frequent basis. Impacts would be temporary and significant and unavoidable for those sensitive receptors located along the flight paths in the proximity to staging areas.”

MM NV-1, intended to mitigate noise impacts, does not reduce all noise impacts to less than significant. Instead, MM NV-1 provides methods for reducing noise impacts, which may be applied to all noise generating activities, including helicopter use. Specifically, the measure calls for use of low noise emission equipment—including engines—and for compensation to residents temporarily relocated during high-noise impacts that cannot be reduced to less than 75dBA. Likewise, the measure calls for the development of a noise control plan, for which noise related to helicopter use would be included. Therefore, MM NV-1 is applicable to helicopter use.

**99-71:** As noted, the EIR does address the potential for noise impacts to certain animal species. The EIR discloses that noise would have intermittent effects and that some species and habitat would be affected. Note that the commenter makes general reference to “additional studies” but does not identify the names, authors, or dates of publication of those studies. Therefore, the CPUC cannot provide further comment on this topic. Project Commitment H would be used to help reduce potential impacts associated with noise.

**99-72:** See response to comment 99-49 and 99-59.

**99-73:** See revisions to Section 4.4.4.2. In particular, MM BR-18 has been included in the impact discussion under Impact BR-1 (VIG and ASP). Note that the CPUC requires that Project Commitments be implemented and considers Project Commitments to be part of the applicant's proposed project. Therefore, the introduction of this new measure merely clarifies for the commenter that Project Commitments will be included in the MMCRP.

**99-74:** See response to comment 99-73.

**99-75:** See response to comment 99-73.

**99-76:** See response to comment 99-73.

**99-77:** See response to comment 99-73.

**99-78:** Comment noted. The applicant will comply with FAA requirements for project components that may affect navigable airspace.

**99-79:** Comment noted. See response to comments 99-7 through 99-9

**99-80:** Comment noted. See responses to comments 99-21 through 99-35.

- 99-81:** Comment noted. See responses to comments 99-36 through 99-48.
- 99-82:** Comment noted. See responses to comments 99-36 through 99-48.
- 99-83:** Comment noted. See responses to comments 99-36 through 99-48.
- 99-84:** Comment noted. See responses to comments 99-36 through 99-48.
- 99-85:** See response to comment 99-71.
- 99-86:** The applicant's project design is based on recent construction requirements and engineering data. The assumptions made by the applicant regarding helicopter use in the EIR represent the worst case scenario. Therefore, no additional changes are required.
- 99-87:** See response to comment 99-60.
- 99-88:** The purpose of the current EIR is to evaluate the applicant's updated project design, which is based on updated construction requirements and engineering data that were unavailable at the time of the initial project review. Therefore, no further response is necessary because no issues related to the adequacy of the current environmental impact analysis in the DEIR were raised.
- 99-89:** See response to comment 99-73.
- 99-90:** See response to comment 99-78.
- 99-91:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.
- 110-1:** See Appendix K.

#### **Glen Eden Sun Club (Letters # 9, # 16, and # 68)**

- 9-1:** Comment noted.
- 9-2:** Your opposition to the proposed project along De Palma Road between Indian Truck Trail and Horsethief Canyon Road has been noted.
- 9-3:** For a discussion of aesthetic impacts on public views in the project area see Section 4.1, Aesthetics. Visual impacts of the proposed project were evaluated using the Federal Highway Administration Guidance. This included the production of 15 visual simulations, which show the proposed project elements as a photographic montage. Consideration was made not only for the height of the new (or replacement) poles, but also changes due to color, line, and form. Various user groups also were considered, along with the duration of a view. In some locations, the new poles are taller than the existing ones. For VIG 7, the visual analysis placed this segment within the Temescal Canyon landscape unit, and is illustrated by the analysis of Viewpoints 1 and 2. Visual impacts were determined to be less than significant based on the

aesthetic impact assessment methodology outlined in section 4.1.3.1 and the CEQA significance criteria in section 4.1.3.4.

- 9-4:** This portion of the project (VIG 7) will consist of a new single circuit 115-kV subtransmission line, comprised of 10 wood poles, 30 LWS poles, 20 TSPs, 10 wood shoofly posts (temporary), and 1 riser. In some locations (such as the shoofly section), where existing single circuit poles are present, they would be replaced by double circuit structures. A portion also will be placed within an underground conduit along De Palma Road east of the intersection of Campbel Ranch Road and Santiago Canyon Road. In addition, as shown in Section 3.0, several alternatives are carried forward for analysis. Alternatives B1, B2, and C include portions that are underground. Each of the alternatives then is evaluated as part of Section 5.0. Table 5-1 shows the various impacts to aesthetics as compared to the proposed project. Alternative B1 is shown as similar in aesthetic impacts; B2 as greater impacts; and Alternative C as reduced (albeit ranked third). Alternative M, which does consider fully undergrounding the project, is shown as having reduced aesthetic impacts as compared to the project. However, the consideration for the project includes not only aesthetics but also all other resources, which for some areas are greater when undergrounding is used. Views from private residences are not protected under CEQA. Therefore, public views along I-15 (VIG 7) were analyzed in the EIR, and no significant impacts were identified.
- 9-5:** See response to comment 9-2.
- 9-6:** Your support for undergrounding transmission lines along De Palma Road between Indian Truck Trail and Horsethief Canyon Road has been noted; however, no significant impacts were identified from publically accessible locations in this area (VIG 7). Note that the purpose of the CEQA aesthetics analysis is to evaluate and reduce impacts on public views.
- 9-7:** For Segment VIG7, a part of which is located near this intersection, the project would follow existing distribution line right-of-ways, and the existing overhead distribution line would be relocated to an overhead position on a lower section of the new 115-kV structures. The view in this location is captured as part of the simulations presented for Key Viewpoints 1 and 2. Key Viewpoint 1 had a moderately high level of visual sensitivity, as well as a moderately low rating for vividness, intactness, and unity. With the project, these levels would drop only to low. The same was shown for Key Viewpoint 2, except the level of vividness remained at moderately low both with and without the project. For these reasons, the evaluation shows that no significant impact would occur as a result of the project, and therefore, the relocation of the structure was not presented as an option or alternative within the analysis. CEQA requires that impacts on public views--as opposed to private views--be evaluated and mitigated.
- 9-8:** Helicopters would be used for the construction (where feasible) for the 500-kv towers as part of the Alberhill project and for sections of the Valley-IvyGlen 115-kV subtransmission line towers. Light-duty helicopters may be used along 115-kV Segments VIG1 and VIG4 to VIG7 for materials delivery, hardware installation, and wire stringing. In general, helicopter operations (including takeoff and landing) would be limited to areas in proximity to wire stringing sites or access roads and previously disturbed areas near construction sites within the 115-kV Valley-Ivyglen General Disturbance Area or fueling, takeoff, and landing areas. Heavy-duty helicopters would not be used for construction of the proposed Valley-Ivyglen Subtransmission Line Project. All helicopter usage will be conducted in accordance with best management practices intended to limit the potential for impacts as a result of their use. All

usage would be in accordance with applicable noise ordinances. As VIG7 is located within the vicinity of the Glen Eden Sun Club, helicopter use may occur. The use of helicopters is dictated by a number of constraints. Therefore, it is not practicable to ban helicopter use in specific areas.

- 9-9:** As shown in Section 3.0, several alternatives are carried forward for analysis. Alternatives B1, B2, and C include portions that are underground. Each of the alternatives then is evaluated as part of Section 5.0. Table 5-1 shows the various impacts to aesthetics as compared to the proposed project. Alternative B1 is shown as similar in aesthetic impacts; B2 as greater impacts; and Alternative C as reduced (albeit ranked third). Alternative M, which does consider fully undergrounding the project, is shown as having reduced aesthetic impacts as compared to the project. However, the consideration for the project includes not only aesthetics, but also all other resources, which for some areas are greater when undergrounding is used. Cumulative impacts for the project are discussed in Section 6.0. Note that aesthetic impacts on public viewpoints in VIG 7 were evaluated and determined to be less than significant. Therefore, undergrounding has not been considered for this segment. The purpose of CEQA is to protect public views within the project area. Your statement is included in the public record and will be taken into account by decision-makers.
- 9-10:** Your request has been noted.
- 16-1:** The CPUC acknowledges the receipt of over 150 signatures from members of the Glen Eden Sun Club. Your support for VIG Alternative M and general opposition to the proposed project have been noted.
- 68-1:** The view in this location is captured as part of the simulations presented for Key Viewpoints 1 and 2. Key Viewpoint 1 had a moderately high level of visual sensitivity, as well as a moderately low rating for vividness, intactness, and unity. With the project, these levels would be low. The same was shown for Key Viewpoint 2, except the level of vividness remained at moderately low both with and without the project. For these reasons, the evaluation shows that no significant impact would occur. Therefore, undergrounding for VIG 7 was not considered.
- 68-2:** See response to comment 68-1. In addition, see revisions to Chapter 5.0, Comparison of Alternatives. Note that CEQA does not required that the alternatives analyses be as detailed as the project. However, due to comments received on the DEIR, the CPUC has taken a closer look at alternatives and determined that none of the alternatives would clearly reduce impacts or be environmentally superior to the proposed project. Note that while alternatives would reduce impacts on certain resource areas, such as aesthetics, they would increase impacts on other resource areas.
- 68-3:** For an analysis of potential noise impacts associated with construction of the project, see Section 4.11 of the Draft EIR. Section 4.11.3 discuss the methodology and significance criteria under CEQA that were used to evaluate potential noise impacts. See Section 4.11.4.1 for measures the project applicant has committed to as part of the design of the proposed Valley-Ivyglen Subtransmission Line Project, including: limiting all construction and general maintenance activities to the hours of 7:00 am to 7:00 pm and prohibited on Sundays and all legally proclaimed holidays; using noise reduction features for construction equipment; routing construction traffic away from residences where feasible; minimizing unnecessary construction vehicle use and idling time to the extent feasible; notifying all receptors within 500 feet of

construction of the potential to experience significant noise levels during construction; using noise reduction measures during construction in areas where sensitive receptors would be subjected to significant noise impacts; and shielding small stationary equipment with portable barriers within 100 feet of residences. The Draft EIR found the potential impact of exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standard of other agencies, less than significant with mitigation (Impact NV-1). See MM NV-1, for construction and maintenance noise reduction measures that will be in place for the proposed project.

**68-4:** See response to comment 68-1 and 68-2.

**68-5:** See response to comment 68-1 and 68-2.

**68-6:** Helicopters would be used intermittently throughout the project area, as required due to terrain, and their use would be reduced to the extent practicable. Use of helicopters is dependent upon the location of project components, and therefore, the use of helicopters cannot be moved to a different location.

**68-7:** The Glen Eden Corporation has been added to the mailing list to receive future notifications related to the proposed project.

#### **Horsethief Canyon Ranch and Lemon Grove Residents (Letter # 104)**

**104-1:** Your support for VIG Alternative M and opposition to ASP Alternative DD has been noted. See Section 4.1, Aesthetics, and Section 4.8, Hazards and Hazardous Materials. Regarding loss of property values, per CEQA Guidelines Section 15131, CEQA does not require an analysis of economic impacts. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required. The CPUC acknowledges receipt of 43 pages of signatures in opposition to the project.

#### **The Giardinelli Law Group (Letters # 6, # 118, and # 63)**

**6-1:** The CPUC's consultant confirmed for the commenter that verbal and written comments would be accepted at the public meetings.

**118-1:** The CPUC's consultant communicated the timeline for production of the FEIR as it was known at the time that the comment was submitted.

**63-1:** Comment noted.

**63-2:** See responses to comments 63-3 through 63-16.

**63-3:** Your support for undergrounding has been noted and will be taken into account by decision-makers when they consider the proposed Project. Regarding aesthetic impacts, refer to Section 4.1, Aesthetics. Regarding safety, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities.

- 63-4:** The commenter’s general support for undergrounding has been documented and will be taken into account by decision makers. Regarding the alternatives selection process, refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. Note that the alternatives analysis compares the impacts of alternatives identified during development of the Draft EIR against baseline conditions, which are generally understood to be conditions at the time of NOP publication. If the County or Castle and Cook make improvements to Lake Street at some point in the future, the design of those projects can consider undergrounding existing infrastructure, which could include any SCE transmission lines that may or may not be constructed as part of the proposed project or its alternatives.
- 63-5:** The commenter is correct that the pole alignments are preliminary and have not been updated. The exact locations of poles will be based on final engineering considerations. Final engineering will be completed after the FEIR is certified as the project moves closer to construction. Proposals for future roadways or other planned improvements will be taken into consideration by the applicant.
- 63-6:** Comment noted.
- 63-7:** See response to comment 63-5.
- 63-8:** See response to comment 63-5.
- 63-9:** Note that the figures included in the EIR are intended for the analysis of environmental impacts and do not represent final engineering, and applicant will refine exact pole placements prior to construction. The figures are considered adequate for the purposes of the environmental analysis. Therefore, no change to the figures are required.
- 63-10:** The comment relates to the MSHCP boundaries with respect to the commenter's property and does not allege that the depiction led to any inaccuracies in the environmental analysis of the proposed project. Therefore, no changes are required.
- 63-11:** Comment noted. See responses to comments 63-9 and 63-10.
- 63-12:** Comment noted.
- 63-13:** Comment noted. A wetland assessment was conducted for the DEIR. A wetland delineation will be conducted during the permitting phase of the proposed project. The Jurisdictional Determination from the U.S. Army Corps of Engineers (USACE) for the TPA delineation (File Number: SPL-2012-0188-CLD) administered on December 17, 2014 will be included in the permitting package submitted to the USACE to obtain a Jurisdictional Determination for the proposed project. No edits to the DEIR are required.
- 63-14:** Comment noted. In the USACE memo, Ms. Moore explained the standard USACE methodology of determining jurisdictional wetland and other waters of the U.S. No edits to the DEIR are required.

- 63-15:** See the revisions to the MSHCP discussion under Section 4.4.2.3, which describe how the applicant would be covered under the MSHCP.
- 63-16:** Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.
- 63-17:** Comment noted.

#### [The Nevada Hydro Company \(Letter # 4\)](#)

- 4-1:** The CPUC acknowledges receipt of Nevada Hydro's comments.
- 4-2:** To clarify, the DEIR published by CPUC on April 14, 2016, is for two proposed projects—the Alberhill System Project and the Valley-Ivyglen Subtransmission Project, as explained on pages 1-1 through 1-2 of the DEIR. No additional response is required.
- 4-3:** Each project is subject to a separate proceeding at the CPUC. Nevada Hydro is a party to the Alberhill System Project proceeding (A.09-09-022) but is not a party in the Valley-Ivyglen Subtransmission Project proceeding (A.07-01-031). Because Nevada Hydro states it is a party to the proceeding and Nevada Hydro is only a party to the Alberhill System Project proceeding, it is assumed for purposes of responding to comments that the remainder of Nevada Hydro's comment letter is focused on the Alberhill System Project.
- 4-4:** See response to comments 4-2, 4-14, 4-15, 4-17, 4-18, and 4-22.
- 4-5:** See response to comment 4-27 regarding completeness of SCE's application for a CPCN.
- 4-6:** See response to comment 4-22 for a discussion of revisions to the EIR with respect to the Lake Elsinore Advanced Pump Storage Project (LEAPS) 500-kV transmission line and interconnection to Alberhill Substation. See response to comment 4-26 regarding whether the DEIR must be recirculated.
- 4-7:** To clarify, under project 14227, Nevada Hydro has been granted a preliminary permit. FERC is not actively licensing LEAPS at this time; however, the preliminary permit “[allows] the permit holder to investigate the feasibility of project while the permit holder conducts investigations and secures necessary data to determine the feasibility of the proposed project and to prepare a license application” (FERC 2012). The CPUC understands, based on information contained in Nevada Hydro's most recent reports to FERC, that Nevada Hydro “is continuing moving to complete necessary work that will allow it to file a complete license application in a timely fashion” (NV Hydro 2016). The CPUC recognizes that a license application was filed for LEAPS under FERC Project 11858, but that FERC dismissed that application due to concerns about the working relationship between Nevada Hydro and their co-applicant. With regards to the current LEAPS project—Project 14227—FERC indicated to the CPUC's consultant that a license application has not been filed (Fargo pers. comm. 2017). This comment does not raise environmental issues regarding the DEIR or its analyses or conclusions; therefore, no additional response is required.

- 4-8:** The CPUC acknowledges that FERC staff published a Final Environmental Impact Statement (EIS) under NEPA in connection with FERC Project 11858. Note that the 2007 FERC LEAPS Final EIS does not state explicitly that LEAPS would connect at the “Lake” site to the Valley – Serrano 500-kV transmission line. Appendix F of the FERC Final EIS shows an aboveground route between LEAPS’ proposed upper reservoir and an area identified in Section 2 of the Final EIS as the “Proposed Northern Substation.” In addition, Section 5 of the Final EIS references the “northern substation near Lee Lake.” The CPUC also notes that Nevada Hydro’s 2012 LEAPS Pre Application Document (PAD)<sup>8</sup> references a “Lake Switchyard” (Figure 2 of the PAD), which is presumably the “Lake Site” referenced by the commenter. This comment does not raise environmental issues regarding the DEIR or its analyses or conclusions; therefore, no additional response is required.
- 4-8a:** Contrary to the commenter's statement that the EIS is “in the process of being updated in the present docket,” FERC indicated to the CPUC that no National Environmental Policy Act (NEPA) review is currently underway for Project 14227 (Fargo pers. comm. 2017). Any additional NEPA review would occur after filing of a license application (Fargo pers. comm. 2017). Nevada Hydro has not yet filed an application for a license, as described in response to comment 4-7. This comment does not raise environmental issues regarding the DEIR or its analyses or conclusions; therefore, no additional response is required.
- 4-9:** The CPUC reviewed the *San Diego Gas & Electric Company Valley – Rainbow 500 kV Interconnect Project - Interim Preliminary Report on Alternatives Screening*. Nevada Hydro states that this document was prepared in compliance with CEQA; however, note that the alternative screening process was undertaken “to capture the analysis process and status alternatives as of November 2002,” and as stated in the report, “[the report] is intended to be an informational source and is not, in and of itself, a CEQA/NEPA document nor does it substitute for a full EIR/EIS” (CPUC and the Bureau of Land Management (BLM) 2002). Although a Notice of Preparation was issued for the project in 2001, and the CPUC published an Initial Study and public scoping report, the CEQA process was not completed. The request for a CPCN was denied, and the CPUC ordered that the Energy Division cease preparation of the CEQA document in 2002 (CPUC 2002).

The report contains two routes that appear to have been submitted by Nevada Hydro (the “Cleveland National Forest, Trabuco District” alternatives). Although the commenter states, “Nevada Hydro’s route and connection point were identified as potentially the only viable route for the proposed connection,” the report notes that the feasibility of both Trabuco District alternatives were “undetermined” (CPUC and BLM 2002).

This comment does not raise environmental issues regarding the DEIR or its analyses or conclusions; therefore, no additional response is required.

- 4-10:** To clarify, the CPUC, with the BLM as the NEPA lead agency, released the Final EIR/EIS for the Sunrise Powerlink project in 2008. The Final EIR/EIS examined two alternatives involving LEAPS, including the “LEAPS Generation and Transmission Alternative” and the “LEAPS Transmission-Only Alternative.” The LEAPS Generation and Transmission Alternative

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<sup>8</sup> The PAD was submitted for the LEAPS project in the docket for FERC Project 14227, under which Nevada Hydro currently holds a preliminary permit.

included the entire LEAPS project. The LEAPS Transmission-Only alternative included only the 500-kV transmission interconnection of the LEAPS Project and an upgrade to an existing 230-kV transmission line. The LEAPS Transmission-Only Alternative was the same as the Talega-Escondido/Valley-Serrano (TE/VS) 500-kV transmission line (CPUC 2008). The LEAPS Transmission-Only Alternative and LEAPS Generation and Transmission Alternative were found to be among the environmentally superior alternatives to the proposed project then under review. At the time, Nevada Hydro had applied to the CPUC for a CPCN for the TE/VS project (CPUC 2008). The CPUC’s decision on the Sunrise Powerlink project concluded that there was not substantial evidence that the LEAPS Transmission-Only Alternative could meet most of the basic project objectives of the Sunrise Powerlink Project and determined it would be evaluated in its own CPCN proceeding (CPUC 2008). The CPUC’s decision granting a CPCN approved a different alternative – the Environmentally Superior Southern Route (CPUC 2008).

This comment does not raise environmental issues regarding the Draft EIR or its analyses or conclusions; therefore, no additional response is required.

- 4-11:** See responses to comments 4-14, 4-17, and 4-18 regarding the requirements of the Large Generator Interconnection Agreement (LGIA) with regards to interconnection of LEAPS to the Alberhill Substation. See response to comment 4-22 for a discussion of revisions to the EIR with respect to the LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation.
- 4-12:** The CPUC acknowledges the LGIA between SCE and Nevada Hydro, and notes the commenter’s statements about the CAISO interconnection queue. This comment does not raise environmental issues regarding the DEIR or its analyses or conclusions; therefore, no additional response is required.
- 4-12a:** The commenter's assertion is noted and included in the record. The commenter provides no detail nor does the commenter explain what bearing the statement has on the CPUC’s review of the Alberhill System Project under CEQA that would allow for a more detailed response to this comment. Therefore, no additional response can be provided.
- 4-12b:** This statement is noted and included in the record, with the document found at the referenced hyperlink, for consideration by decision makers. The comment does not raise environmental issues regarding the DEIR or its analyses or conclusions; therefore, no additional response is required.
- 4-12c:** The LGIA is noted and included in the record for consideration by the decision makers. Note that CEQA does not require that the lead agency respond to general reference materials cited to support comments (*Environmental Protection Information Center v. Dept. of Forestry & Fire Protection* (2008) 44 Ca.4th 459, 483–484). To the extent that Nevada Hydro references specific portions of the LGIA in its comments on the EIR or uses specific portions of the LGIA to support its comments on the EIR, the LGIA is addressed in responses to comments 4-14, 4-15, 4-16, 4-17, 4-18, 4-19, and 4-22.
- 4-13:** Nevada Hydro’s contentions about the settlement negotiations for the LGIA are noted and included in the record. Per response to comment 4-8, although the FERC Final EIS does not specifically reference a “Lake” site, the CPUC recognizes that the “Northern Substation” identified in the EIS—or potentially another location near Lee Lake referenced in other

documents—is understood by the commenter to be the “Lake location.” Further, the CPUC acknowledges that the LGIA identifies the Alberhill Substation as the point of interconnection and that it is generally understood that the Alberhill Substation would likely be the LEAPS interconnection point in the event that both the Alberhill Substation and LEAPS are constructed. Because the comment does not raise an environmental issue and the commenter does not explain the relevance of its claims about the settlement negotiations for the LGIA to the DEIR, no additional response can be provided.

- 4-14:** The LGIA’s identification of the Alberhill Substation as the LEAPS interconnection point is noted and included in the record. To clarify, while the LGIA identifies the Alberhill Substation as the point of interconnection, the LGIA discloses the possibility of other interconnection options should SCE modify its plan for the Alberhill Substation or if it is not constructed:

In the event that SCE modifies its plan for the Alberhill 500/115 kV Substation, or the substation project does not receive CPUC approval, then the Participating TO would develop an alternate plan to connect the Generating Facility to the Valley – Serrano 500kV Transmission Line. The alternate plan for connection to the Valley-Serrano 500kV Transmission Line may be subject to CPUC review and concurrence if this information has not yet been evaluated as part of the LGIP review process. (Nevada Hydro, SCE, and the California Independent System Operator (CAISO) 2013)

Regarding the commenter's assertions about the FERC Final EIS’s identification of a “Lake” site, see response to comment 4-8 and references to the “Northern Substation” and “Lake Switchyard.” The CPUC notes that the Alberhill Substation is about 1.6 miles southeast of the Lake Switchyard site. This comment does not raise environmental issues regarding the DEIR or its analyses or conclusions; therefore, no additional response is required.

- 4-15:** The CPUC reviewed the LGIA with regards to construction schedule and was unable to locate a clause that mandates that parties to the LGIA “coordinate their construction schedule so that completion of the Alberhill System Project and other upgrades would coincide with the timing for the commercial operation date for LEAPS. . . .” It is unclear what section of the LGIA the commenter is referring to because the commenter does not provide any specific references to sections of the LGIA. The commenter may be referring to the content of Article 5 of the LGIA, which sets forth the responsibilities for each party in selecting dates such as the in-service date and completion date of the required interconnection facilities and network upgrades. In any event, the commenter’s claims about schedule coordination and provisions of funds to SCE, whether or not they are required by the LGIA, do not raise any environmental issues regarding the DEIR or its analysis; therefore, no additional response is required.
- 4-16:** The commenter does not explain or provide detail as to which of their, SCE’s, or CAISO’s “expectations” have been affected by omission of SCE’s LGIA obligations from the EIR. The commenter has not provided detail about how CAISO’s planning efforts have been affected by the DEIR. Furthermore, CAISO did not submit a comment on the DEIR, and SCE’s comment on the Draft EIR was silent about the LGIA. CEQA Guidelines section 15126.2 requires that “[a]n EIR . . . identify and focus on the significant environmental effects of the proposed project.” CEQA Guidelines section 15358 requires that effects analyzed under CEQA be related to a physical change. Impacts to “expectations” without a nexus to a physical change in the environment need not be analyzed under CEQA. The comment does not allege a physical impact on the environment; therefore, no additional response can be or need be provided.

**4-17:** The statements regarding the LGIA’s requirements for interconnection of LEAPS to the Alberhill Substation, as well as Exhibit 1 attached to the commenter’s letter, are noted and included in the record for consideration by the decision makers. The full portion of the commenter’s quote from the LGIA is:

In the event that SCE modifies its plan for the Alberhill 500/115 kV Substation, or the substation project does not receive CPUC approval, then the Participating TO would develop an alternate plan to connect the Generating Facility to the Valley – Serrano 500kV Transmission Line. The alternate plan for connection to the Valley-Serrano 500kV Transmission Line may be subject to CPUC review and concurrence if this information has not yet been evaluated as part of the LGIP review process.

This comment does not raise an environmental issue or an issue with the DEIR’s analysis or conclusions; therefore, no further response is required.

**4-18:** The commenter notes that impacts of an alternative LEAPS interconnection plan are absent from the Draft EIR. See response to comment 4-22, which explains that the LEAPS’ interconnection is not a consequence of the construction of the Alberhill Substation and is therefore not part of the proposed project under CEQA. As explained in response to comment 4-8, a “Lake Switchyard” is identified in Nevada Hydro’s 2012 PAD. The CPUC understands the “Lake site” referenced by the commenter to be the “Lake Switchyard” identified in Nevada Hydro’s 2012 PAD. The CPUC further acknowledges, per the LGIA quotation included in response to comment 4-17, that if the Alberhill Substation is not constructed and LEAPS is later approved, an “alternative plan to connect [LEAPS] to the Valley – Serrano 500kV Transmission Line” would be implemented. Such a plan could include interconnection at the Alternative DD Substation, if feasible, or as described in text added to Chapter 5.0, Comparison of Alternatives (see “Cumulative Impacts” under the Alternative DD analysis), would more likely include the construction of another substation at the Lake Switchyard site or another site. If either of the latter are required as a consequence of the Alberhill Substation not being constructed (i.e., if either the Lake Switchyard or another substation not analyzed in the EIR are required), a separate application would be filed at some point in the future. Finally, the CPUC notes that there is nothing in the record that would prevent Nevada Hydro or another entity from filing an application for another substation in the vicinity.

**4-19:** Nevada Hydro’s claim about “certain consequences” to SCE if it does not meet obligations in the LGIA is noted and included in the project record. This comment does not raise environmental issues or issues with the DEIR analysis or conclusions; therefore, no additional response is required.

**4-20:** Nevada Hydro’s letter to SCE, attached as Attachment 2 to the comment letter, as well as its comment on the seriousness of the matter are noted and included in the project record for consideration by the decision makers. Responses to comments 4-38 through 4-71 address the content of Nevada Hydro’s letter to SCE.

**4-21:** See responses to comments 4-22 through 4-26.

**4-22: Evaluation of LEAPS as Part of the Proposed Project**

CEQA requires “that an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project;

and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects. Absent these two circumstances, the future expansion need not be considered in the EIR for the proposed project” (*Laurel Heights Improvement Association of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 396). Although the commenter claims that CEQA requires that certain information about future actions be included in the project description, under CEQA “the issue should not be rigidly defined as whether the project description was adequate . . . [as] the fundamental dispute is whether the EIR adequately discussed future uses of the [project] and their environmental effects” (*Id.*, n.6).

Although not made clear in the comment, it is presumed the commenter considers the interconnection of LEAPS at Alberhill Substation a “reasonably foreseeable consequence” of the Alberhill Substation’s construction as part of the Alberhill System Project. However, the LEAPS interconnection is not a “reasonably foreseeable consequence” of the Alberhill System Project. Rather, the interconnection of the LEAPS project to the SCE grid is a reasonably foreseeable consequence of LEAPS. Section 5.6 of the LGIA states that SCE shall begin construction of the interconnection facilities and network upgrades as soon as practicable after several conditions are satisfied. One condition listed in LGIA section 5.6.1 is that “[a]pproval of the appropriate Governmental Authority has been obtained for any facilities requiring regulatory approval” (Nevada Hydro, SCE, and CAISO 2014). Nevada Hydro would need a license from FERC as well as all other government approvals to build LEAPS to satisfy this condition before SCE must begin construction of interconnection facilities at Alberhill Substation.<sup>9</sup> This clearly demonstrates that LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation are *a reasonably foreseeable consequence of LEAPS* and that LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation are not a reasonably foreseeable consequence of the construction of the Alberhill Substation or the Alberhill System Project. Furthermore, providing an interconnection for the LEAPS project is independent from the purpose of the Alberhill Substation and Alberhill System Project, and is not part of the proposed project. The objectives of the Alberhill System Project are explained in EIR section 1.2.2; none of the identified objectives relate to providing an interconnection for the LEAPS project. Details regarding the project objectives are further articulated in Appendix K. Therefore, the LEAPS project was correctly omitted from the Draft EIR’s project description and from the environmental analysis of the proposed Alberhill System Project, except in the context of cumulative impacts (as noted below).

#### **Evaluation of LEAPS as a Connected Action**

To clarify the commenter’s claims about “connected actions,” and as explained in the ruling cited by the commenter in footnote 12, “connected actions” are a consideration under NEPA. NEPA requires the proposed action under NEPA include federal connected actions (Code of Federal Regulations, Title 40, Section 1508.25(a)). Similarly, CEQA (CEQA Guidelines Section 15003 (h) and Section 15378) requires the “whole of the action” be analyzed for the proposed project. However, providing an interconnection for the LEAPS project is independent from purpose of the Alberhill Substation and Alberhill System Project, and is not part of the “whole of the action” or the proposed project.

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<sup>9</sup> As described in response to comment 4-7, Nevada Hydro currently has only a preliminary permit for the LEAPS project. As described in response to comment 4-8a, Nevada hydro has not even filed an application for a license for LEAPS from FERC.

### Indirect Impacts

To clarify CEQA’s requirements with regards to indirect impacts, CEQA Guidelines section 15358(a)(2) requires analysis of “indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable.” As described above, the LEAPS project was properly omitted from the project description of the Alberhill System Project; therefore, indirect impacts associated with LEAPS were properly omitted from the analysis. The commenter does not make any claims as to the DEIR’s adequacy with regards to its analysis or conclusion regarding reasonably foreseeable indirect impacts associated with the proposed project as defined in the EIR; therefore, no additional response can be provided.

### Evaluation of LEAPS as a Cumulative Project

Although the commenter does not explicitly request that the LEAPS interconnection be included in the cumulative impacts analysis, the CPUC has concluded that the LEAPS project should be considered a cumulative project, because (for CEQA purposes) it is prudent to consider it to be a reasonably foreseeable probable future project, due to the existence of (1) an LGIA with SCE and (2) a preliminary permit issued by FERC. (CEQA Guidelines section 15355(b).)

With regards to cumulative impacts, CEQA Guidelines Section 15355 defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” An EIR’s discussion of cumulative impacts begins with a discussion of whether the “combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant . . .” (CEQA Guidelines section 15130(a)(2)). If the cumulative impact is not significant, the EIR does not need to provide additional detail about the impact (*see* CEQA Guidelines section 15130(a)(2)). If the cumulative impact is significant, then the EIR must discuss whether the project’s contribution to that impact is “cumulatively considerable” (*see* CEQA Guidelines section 15130(a)(3)).

As explained in EIR section 6.2.2, the EIR uses the project list approach and the summary of projections approach for the cumulative impacts analysis. Individual cumulative projects are only examined when the project list approach is used. Given the fact that Nevada Hydro has not yet filed an application with FERC, it is unlikely that LEAPS would be constructed within the timeframe of the Alberhill System Project or Valley-Ivyglen Subtransmission Project. Therefore, the cumulative impacts of the LEAPS project have only been considered for resource areas where the DEIR uses the project list approach and where significant impacts would occur during operation.<sup>10</sup>

Under the project list approach, impacts of individual projects are considered in combination with the impacts of the proposed project. CEQA Guidelines section 15145 states the general rule that, “[i]f after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of

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<sup>10</sup> As listed in Draft EIR section 4.2.2.1, resource areas that use the project list approach include aesthetics, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and transportation and traffic. However, the CPUC determined that only aesthetics impacts would have the potential to be cumulatively considerable because only aesthetics impacts would be significant and unavoidable during operations.

the impact.” If the Alberhill Substation is constructed and the LEAPS project is approved, the LEAPs interconnection point would be the Alberhill Substation. However, if the Alberhill Substation is not constructed, an alternative, but as of yet unknown, plan to interconnect LEAPS would be implemented in accordance with the terms of the LGIA. Therefore, while the CPUC assumes that, in its review of each of the Alberhill Systems Project and the Valley-Ivyglen Subtransmission Line Project, each would contribute to a cumulative impact with certain LEAPS 500-kV interconnection components in certain resource areas, because the design, location and timing of construction of the LEAPS interconnection components are unknown, the nature and extent of the significance of the Valley-Ivyglen Subtransmission Line Project’s or the Alberhill System Project’s contribution to a cumulative impact cannot be ascertained and is speculative. Though the nature and severity of the potential impacts is speculative, a general discussion of impacts with respect to aesthetics has been added to Chapter 6.0.

In addition, while previous applications submitted to both the CPUC and FERC contained routing information for LEAPS’ associated 500-kV transmission line, the CPUC notes that such routes were intended to connect to the Lake Switchyard, which is located over a mile west of the proposed Alberhill Substation site. Therefore, it is reasonable to assume that if the Alberhill Substation is constructed and LEAPS is later approved, the 500-kV transmission line would be rerouted to connect to the Alberhill Substation. As a result, while a general discussion of impacts related to the LEAPS interconnection at the Alberhill Substation have been added to the aesthetics analysis in Chapter 6.0, the nature and extent of the impacts of the LEAPS 500-kV transmission line cannot be evaluated, and it would be speculative for the EIR to evaluate the cumulative impacts resulting from either of the proposed projects together with the LEAPS 500-kV transmission line. Therefore, a discussion of the cumulative impacts resulting from the LEAPS 500-KV transmission line is not included in Chapter 6.0.

- 4-22a:** To clarify, the *Assigned Commissioner’s Ruling Addressing Newly Disclosed Environmental Information* was issued on July 24, 2007, not July 27, 2007.
- 4-22b:** See response to comment 4-22 regarding the concept of “connected actions.”
- 4-23:** See response to comment 4-22 for a discussion of why the LEAPS 500-kV transmission line and its interconnection to the Alberhill Substation were properly excluded from the proposed project description and the impact analysis of the proposed project and why the CPUC instead considers LEAPS a cumulative project. Regarding alternatives, CEQA Guidelines section 15126.6(a) requires that an EIR describe a reasonable range of alternatives that “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 . . . .” The alternatives analyzed in the EIR meet those requirements. That being said, a discussion of the cumulative impacts of Alternative DD in light of the LEAPS project has been added to Chapter 5.0, Comparison of Alternatives. As a result, Alternative DD is no longer considered the Environmentally Superior Alternative.
- 4-24:** The commenter’s question about successful permitting scenarios for LEAPS and its statement about litigation and delay are noted and included in the record for consideration by the decision makers. However, this comment pertains to the scope and adequacy of the permitting process for the Nevada Hydro’s LEAPS project. This comment does not raise an environmental issue or a concern about the adequacy of the environmental analysis or conclusions of the EIR for the Alberhill System Project, which, as explained in response to comment 4-22, does not include

the LEAPS interconnection or 500-kV transmission line. Therefore, no additional response is necessary.

- 4-25:** To correct the commenter’s citation, it is section 15204(a) of title 14 of the California Code of Regulations (or, CEQA Guidelines section 15204(a)) that contains the text quoted by the commenter. See response to comment 4-22 for a discussion of revisions to the EIR with respect to the LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation.
- 4-26:** A Lead Agency is required to recirculate an EIR when “significant new information” is added to the EIR after notice is given of the availability of the Draft EIR for public review but prior to certification. In addition, CEQA Guidelines section 15088.5 states that, “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect [...] that the project proponents have declined to implement.” Recirculation is not required where the new information added to the EIR merely clarifies, amplifies, or makes insignificant modifications to an otherwise adequate EIR. (See *Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1130.) Response to comment 4-22 discusses the EIR’s analysis of LEAPS. The CPUC considers the disclosure of the LEAPS project in the EIR to be adequate because the design, location and timing of construction of the LEAPS interconnection and its associated 500-KV transmission line are unknown and any further analysis would be speculative. As such, the public has not been deprived of an opportunity to provide meaningful comment, and therefore, recirculation is not required.
- 4-27:** The commenter does not cite to a specific requirement that SCE did not meet that should have precluded the CPUC from deeming SCE’s application complete, so it is uncertain which specific requirement the commenter believes SCE did not comply with. However, for CEQA purposes, CEQA Guidelines section 15101 outlines requirements for the lead agency’s review of an application for completeness and solely provides timelines for deeming an application complete. Any questions about the CPUC’s determination of the completeness of the application are outside of the CEQA process. Additionally, CPUC’s General Order 131-D Section VIII(A) outlines the content required in a CPCN application. Relevant to Nevada Hydro’s comment, GO 131-D Section VIII(A)(1)(a) requires a detailed project description. It is presumed, due to the content of the remainder of Nevada Hydro’s comment letter, that Nevada Hydro believes the “full scope of the proposed project” would include the LEAPS 500-kV transmission line and the interconnection to the Alberhill Substation. As explained in response to comment 4-22, LEAPS’ 500-kV transmission line and interconnection to the Alberhill Substation were appropriately omitted from the EIR’s project description and its environmental analysis of the Alberhill System Project (except as to cumulative impacts). Furthermore, this comment does not raise issues as to the adequacy of the environmental analysis or conclusions in the EIR; therefore, no further response is required.
- 4-28:** This comment contains various claims relating to information SCE provided to CPUC, what SCE knew about LEAPS, the content of SCE’s PEA and Amended PEA, and the LGIA negotiations between Nevada Hydro and SCE. This comment is included in the record for consideration by the decision makers. However, this comment does not raise an environmental issue or a concern about the adequacy of the environmental analysis or conclusions of the EIR; therefore, no additional response is required. See response to comment 4-22 regarding consideration of LEAPS in the EIR.

- 4-29:** Due to the content of the remainder of Nevada Hydro’s comment letter, CPUC presumes this comment pertains to the inclusion of the LEAPS 500-kV transmission line and interconnection to the Alberhill Substation, as contemplated in the LGIA, in the EIR. See response to comment 4-22 for a discussion of revisions to the EIR with respect to the LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation.
- 4-30:** To update and correct the commenter, there are four parties to the Alberhill System Project proceeding (A.09-09-022). The parties are Southern California Edison, CPUC’s Office of Ratepayer Advocates, Nevada Hydro, and Forest Residents Opposing New Transmission Lines (FRONTLINES). FRONTLINES was granted party status on August 31, 2016, after the commenter submitted his DEIR comment.
- 4-31:** CPUC Energy Division reviewed Nevada Hydro’s motion for party status dated June 23, 2010. It is assumed that the “issues” to which Nevada Hydro refers to in this comment are its claim that certain LEAPS components should be analyzed as part of the project description for the Alberhill System Project, as Nevada Hydro claims in its motion:

Contrary to specific CEQA requirements specifying that agencies consider the “whole of the action” (14 CCR 15378[a]), SCE proposes to fragment the environmental process by separating the approval process for its own Alberhill project from its near term purpose of connecting LEAPS and the TE/VS Interconnect into the grid.”

The claim that Nevada Hydro was not contacted during preparation of the Draft EIR is noted and included in the record for the decision makers. The commenter does not claim the lack of consultation with Nevada Hydro during preparation of the DEIR violates CEQA. Nonetheless, note that CEQA requirements for consultation during preparation of an EIR are contained in CEQA Guidelines section 15082 and 15083. Scoping activities are described in DEIR section 1.3.4 and in DEIR Appendix A (Public Scoping Summary). The CPUC’s scoping efforts met and exceeded CEQA requirements for scoping. For example, the CPUC conducted outreach to the general public beyond the requirements in CEQA Guidelines section 15082(a) and section 15083. Furthermore, the CPUC held three scoping meetings, all of which were open to the public, which goes beyond the requirements in CEQA Guidelines section 15082(c).

- 4-32:** This comment makes various claims about what various entities should have known and should have investigated with regards to LEAPS’ connection to the grid. Insofar as this comment ultimately pertains to evaluation of LEAPS in the EIR, as suggested by comment 4-29, see response to comment 4-22 for a discussion of revisions to the EIR with respect to the LEAPS’ 500-kV transmission line and interconnection to the Alberhill Substation.
- 4-33:** The commenter’s contentions that the CPUC’s consultant does not understand construction of energy assets is noted and included in the record.. Contracting with a professional consultant to prepare an EIR is an authorized method of preparation (CEQA Guidelines section 15084(d)(2) and a very common practice. Ultimately, the determination of whether the EIR meets CEQA requirements is made by the Lead Agency in its decision whether to certify the EIR. (CEQA Guidelines section 15090(a)(1).)

It is presumed that the commenter’s statements about “confusion over the project to be assessed” refer to the commenter’s contention that the LEAPS project should have been included in the project description of the Alberhill Systems Project. This is addressed in response to comment 4-22.

In discussing the content of Table 3-1, the commenter refers to ASP Alternative A, the “Lee Lake Substation Site.” As explained in EIR section 3.2.3:

The Alternatives Screening Report [contained in Appendix D] was drafted using preliminary information for the project. As a result, the conclusions made in the EIR have affected the suitability of alternatives that were previously retained in the Alternatives Screening Report. Alternatives that were retained based on preliminary information in the Alternatives Screening Report, but are no longer suitable for full analysis in the EIR, are detailed in Table 3-1.

As explained in Table 3-1 of the EIR, ASP Alternative A was eliminated from consideration in the EIR because it did not meet CEQA requirements for consideration. Under CEQA, for consideration in an EIR, an alternative must avoid or substantially reduce a significant impact of the proposed project, among other requirements. Table 3-1 explains that ASP Alternative A would not avoid or substantially reduce a significant impact of the proposed project. The potential for the construction schedules of the Alberhill System Project and TE/VS project (which the commenter refers to as the “LEAPS 500-kV gen tie” in its comment) to overlap was considered in making that determination. Alternative A was therefore properly eliminated from consideration in the EIR as an alternative to the Alberhill System Project.

See response to comment 4-23 regarding consideration of the LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation in the alternatives analysis for the Alberhill System Project. See response to comment 4-10 regarding the CPUC’s Sunrise Powerlink Project EIR/EIS. The CPUC assumes that “findings in the Final EIS” refers to FERC’s 2007 Final EIS for the LEAPS project as part of FERC Project 11858. See response to comment 4-8 regarding the FERC Final EIS for LEAPS.

Further, the CPUC notes that in the event that the Alberhill Substation is not constructed or the Alternative DD site is selected and the Nevada Hydro project is unable to connect as disclosed in Chapter 5.0, Comparison of Alternatives, the CPUC is unaware of anything in the record that would prevent Nevada Hydro or another entity from proposing another substation at the Lake Switchyard site or another site.

- 4-33a:** This comment contains Nevada Hydro’s unsupported speculation about why the CPUC’s consultant eliminated the “Lake substation site” from consideration in the EIR. See response to comment 4-33 regarding the EIR’s consideration of ASP Alternative A, “Lee Lake Substation Site.”
- 4-34:** This comment makes statements regarding Nevada Hydro’s understanding of conversations with SCE and CPUC staff about what would be included in the analysis of the Alberhill System Project. The comment does not indicate when these discussions occurred, and the CPUC Environmental Division is unaware of any such conversations. Note that the CPUC has conducted this analysis of the proposed Alberhill System Project in accordance with CEQA. See response to comment 4-22 for a discussion of revisions to the EIR with respect to the LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation.
- 4-35:** See response to comment 4-22 for a discussion of revisions to the EIR with respect to the LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation.

- 4-36:** To clarify when preparation of a subsequent or supplemental EIR is required, CEQA Guidelines sections 15162 and 15163 explain that subsequent EIRs and supplemental EIRs are prepared only after an EIR has been certified. The EIR for the Alberhill System Project has not been certified; therefore, Public Resources Code section 21116 does not apply.
- 4-37:** Response to comment 4-36 explains why preparation of a subsequent EIR or supplement EIR is not required. See response to comment 4-22 for a discussion of revisions to the EIR with respect to the LEAPS’ 500-kV transmission line and interconnection to Alberhill Substation.
- 4-38:** This comment is introductory material and for the raises no specific environmental issues. Nevada Hydro’s general concerns about the EIR are noted and included in the project record. Refer to the responses to comments 4-39 to 4-71 for responses to the remainder of Nevada Hydro’s letter to SCE.
- 4-39:** Refer to response to 4-14.
- 4-40:** Refer to response to 4-8.
- 4-40a:** Refer to response to 4-8a.
- 4-41:** This comment contains claims about negotiations with SCE. This comment is included in the record for consideration by the decision makers. However, this comment does not raise an environmental issue or a concern about the adequacy of the environmental analysis or conclusions of the EIR; therefore, no additional response is required.
- 4-42:** Refer to response to comment 4-34.
- 4-43:** The commenter’s concern is noted and included in the record for consideration by the decision makers. The project description in the DEIR is based on SCE’s submittals to the Energy Division. The CPUC is not aware of evidence that the project description in the DEIR is not accurate or is incomplete; therefore, no additional response can be provided.
- 4-44:** This comment contains speculation by Nevada Hydro, which is noted and included in the record, but does not raise environmental issues regarding the DEIR or its analyses or conclusions. Therefore, no additional response is required. Refer to responses to comments 4-64 through 4-71 regarding specific concerns expressed in Attachment 1.
- 4-45:** This comment does not raise environmental issues regarding the DEIR or its analyses or conclusions. Therefore, no additional response is required. Insofar as Nevada Hydro previously claimed that SCE’s application to the CPUC was incomplete because it did not discuss the full scope of the project, refer to responses to comments 4-27 and 4-28.
- 4-46:** Refer to response to comment 4-22 for discussion of LEAPS as a “connected action.” To clarify, the CAISO source cited in Table 3-1 is CAISO’s 2014–2015 Transmission Plan. Table 2.6-7 of the 2014–2015 Transmission Plan notes that the Talega–Escondido/Valley–Serrano 500-kV Interconnect, as submitted by Nevada Hydro, was not found to be needed in the 2014–2015 transmission planning cycle. In the DEIR, this information was used to support the idea that “the potential for the construction schedules for the Alberhill Project and the TE/VS project to overlap was unlikely.” Refer to response to comment 4-33 for further explanation of the content of Table 3-1 of the DEIR.

- 4-47:** This comment contains speculation by Nevada Hydro and is included in the record for consideration by the decision makers. To the extent it raises a question about the LGIA’s consideration in the Draft EIR, refer to response to comment 4-22.
- 4-48:** This comment contains speculation about a contractual breach, statements about payments by Nevada Hydro, and various assertions about how LEAPS cannot interconnect as described in the LGIA. Comments about payments and contractual breach do not raise environmental issues regarding the Draft EIR or its analyses or conclusions; therefore, no additional response to these comments is required. Response to comment 4-22 discusses the DEIR’s project description with regards to LEAPS and the LGIA. The commenter states there is a “substation drawing” in the LGIA; to clarify, the figure in the LGIA is a one-line diagram of the interconnection to Alberhill Substation, which is a schematic drawing.
- 4-49:** This comment expresses concern, reference to unspecified proposed changes, penalties to SCE, a statement that Nevada Hydro cannot know when it may be able to energize LEAPS, and statements about delay. This comment does not raise environmental issues regarding the DEIR or its analyses or conclusions; therefore, no additional response is required.
- 4-50:** Refer to response to 4-22.
- 4-50a:** Refer to response to 4-22.
- 4-50b:** Refer to response to 4-22.
- 4-51:** Refer to response to 4-24.
- 4-52:** This comment contains a question for SCE that does not pertain to the adequacy of the DEIR or its environmental analysis or conclusions; therefore, no response is required to the question. Attachment 2 is noted and included in the record for consideration by the decision makers. Refer to response to 4-17 regarding the full text of the LGIA provision cited by the commenter.
- 4-53:** This comment contains a statement regarding Nevada Hydro’s uncertainty about how SCE will allow for a connection pursuant to the LGIA, which does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required. Presumably, the “piecemealing” claim raised by the commenter refers to the DEIR’s discussion of the LGIA. Refer to response to comment 4-22.
- 4-54:** This comment contains various statements of Nevada Hydro regarding the content of the LGIA; actions of the SCE, CAISO, and CPUC with regard to the interconnection; discussions between SCE and CAISO; and Nevada Hydro’s speculation about violations of FERC 1000. Nevada Hydro also alludes to other unnamed concerns. Regarding the discussion of the LGIA in the DEIR and the CPUC’s treatment of the LEAPS interconnection, refer to response to comment 4-22. Otherwise, this comment does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required.
- 4-55:** Presumably, given the content of the remainder of the letter, the commenter believes the “mess” referenced in this comment is the DEIR’s omission of the LEAPS 500-kV transmission line interconnect to the Alberhill Substation. For a discussion of the content of SCE’s PEA, refer to

response to comment 4-27. Regardless of the content of SCE’s PEA, the DEIR’s discussion of LEAPS is adequate under CEQA, as explained in response to comment 4-22.

It is unclear what discussion with CAISO the commenter is referring to; however, the commenter may be referring to the information from CAISO cited in DEIR Table 3-1, per comment 4-46. Refer to response to comment 4-46.

- 4-56:** Refer to response to 4-22.
- 4-56a:** This comment is noted and included in the record for the decision makers for consideration. To the extent that, as a footnote to 4-56, the comment may refer to how the CPUC should have considered the LGIA in the DEIR, refer to response to comment 4-22.
- 4-57:** This comment requests that SCE notice the CPUC that it will update its PEA to include SCE’s obligations under the PEA, This comment does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required. Refer also to response to comment 4-27.
- 4-58:** This comment requests that CAISO submit comments on the DEIR. This comment does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required. Regarding Table 3-1, refer to response to comment 4-33.
- 4-59:** Refer to response to comment 4-22 regarding discussion of the LEAPS 500-kV transmission line and interconnection to Alberhill Substation in the DEIR.
- 4-60:** Refer to response to comment 4-26.
- 4-61:** This comment requests that SCE amend its PEA to discuss SCE’s obligations under the LGIA. This comment does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required. Refer also to response to comment 4-27.
- 4-62:** The comment contains a demand that SCE and CAISO agree to certain terms regarding payment schedules in the LGIA and does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required.
- 4-63:** This comment contains various references to SCE’s negotiations with Nevada Hydro, SCE’s obligations under the LGIA, and CAISO’s potential interpretation of interconnection delays. Nevada Hydro expresses a desire to work with SCE and CAISO. This comment does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required.
- 4-64:** The commenter does not specify which CPUC rule or which Public Utilities Code section that SCE may have violated. Refer to response to comment 4-27 regarding the content of SCE’s PEA. Because Nevada Hydro provides no specificity in this comment, no additional response can be provided.
- 4-65:** Refer to response to comment 4-22 regarding discussion of LEAPS facilities in the LGIA in the DEIR, as well as section 4.3 of the LGIA in particular. To clarify, the section of the LGIA that Nevada Hydro refers to requires that construction begin as soon as practicable after four

conditions are met, only one of which is “[a]pproval of the appropriate Governmental Authority has been obtained for any facilities requiring regulatory approval.” The comment does not otherwise raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required.

- 4-66:** The comment about SCE’s demand regarding interconnection of LEAPS does not raise an environmental issue about the DEIR or its analysis or conclusions. Refer to response to comment 4-8 regarding the Lake site’s identification in the FERC Final EIS for LEAPS. Refer to response to comment 4-22 regarding discussion of LEAPS facilities in the LGIA in the DEIR. Note that the CPCN application is for SCE to construct the Alberhill System Project as proposed by SCE.
- 4-67:** This comment contains an allegation that CAISO may have acted in bad faith, which does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required. Refer to response to comment 4-33 regarding the content of Table 3-1 of the DEIR.
- 4-68:** Refer to response to comment 4-66.
- 4-69:** This comment contains Nevada Hydro’s speculation about what an arbitrator might determine with regards to SCE’s obligations under the LGIA, which does not raise an issue with the environmental analysis in the DEIR or its conclusions; therefore, no additional response is required.
- 4-70:** Refer to response to comment 4-33 regarding the content of Table 3-1 of the DEIR. This comment contains an allegation that CAISO may have acted in bad faith or did not exercise reasonable efforts, which does not raise an issue with the environmental analysis in the Draft EIR or its conclusions; therefore, no additional response is required.
- 4-71:** This comment contains statements regarding SCE’s obligations under the LGIA. This comment does not raise an issue with the environmental analysis in the DEIR or its conclusions, and no additional response is required.

#### [We Are Temescal Valley \(Letter # 324\)](#)

- 324-1:** Your support for VIG M and opposition to both the Alberhill Substation site and Alternative DD substation site have been noted.
- 324-2:** The commenter has not provided any specifics regarding allegations of inadequacy or referenced an specific items of the Riverside County General Plan. Therefore, no further response can be given.
- 324-3:** Comment noted.
- 324-4:** See the revised discussion of Alternative DD in Chapter 5.0, Comparison of Alternatives. Further, note that Alternative DD is no longer considered the Environmentally Superior Alternative.
- 324-5:** See response to comment 324-4.

- 324-6:** See response to comment 324-4.
- 324-7:** See response to comment 324-4.
- 324-8:** See response to comment 324-4.
- 324-9:** See response to comment 324-4.
- 324-10:** See response to comment 324-4.
- 324-11:** See response to comment 324-4. Note that per CEQA Guidelines Section 15131, CEQA does not require an analysis of economic impacts.
- 324-12:** See response to comment 324-4.
- 324-13:** Your opposition to the proposed Alberhill Substation site has been noted and will be taken into account by the decision makers.
- 324-14:** See response to comment 324-4 and 324-11. Impacts on aesthetics are located in Section 4.1, Aesthetics. See Section 4.8, Hazards and Hazardous Materials, for a discussion of impacts related to hazards.

**[Southern California Edison \(Letter # 135\)](#)**

- 135-1:** Changes to the schedule have been incorporated into the EIR.
- 135-2:** Changes to the schedule have been incorporated into the EIR.
- 135-3:** The mitigation measures have been updated as indicated throughout these responses to the applicant's comments as well as in response to the comments of other individuals and entities.
- 135-4:** The commenter's suggested edit has been incorporated into the text.
- 135-5:** The commenter's suggested edit has been incorporated into the text.
- 135-6:** The commenter's suggested edit has been incorporated into the text.
- 135-7:** The commenter's suggested edit has been incorporated into the text.
- 135-8:** The commenter's suggested edit has been incorporated into the text.
- 135-9:** The commenter's suggested edit has been incorporated into the text.
- 135-10:** The commenter's suggested edit has been incorporated into the text.

- 135-11:** The commenter's suggested edit has been incorporated into the text.
- 135-12:** The commenter's suggested edit has been incorporated into the text.
- 135-13:** The commenter's suggested edit has been incorporated into the text.
- 135-14:** The commenter's suggested edit has been incorporated into the text.
- 135-15:** The commenter's suggested edit has been incorporated into the text.
- 135-16:** The commenter's suggested edit has been incorporated into the text.
- 135-17:** The commenter's suggested edit has been incorporated into the text.
- 135-18:** The commenter's suggested edit has been incorporated into the text.
- 135-19:** The commenter's suggested edit has been incorporated into the text.
- 135-20:** The commenter's suggested edit has been incorporated into the text.
- 135-21:** The commenter's suggested edit has been incorporated into the text.
- 135-22:** The commenter's suggested edit has been incorporated into the text.
- 135-23:** The commenter's suggested edit refers to SCE's project objectives, which are listed in Section 1.2.1.1. Therefore, no changes have been made to the text.
- 135-24:** The CPUC has elected not to make changes to the project objectives per Appendix K. Therefore, no changes have been made to the text.
- 135-25:** The commenter's suggested edit has been incorporated into the text.
- 135-26:** The commenter's suggested edit has been incorporated into the text.
- 135-27:** The commenter's suggested edit has been incorporated into the text.
- 135-28:** The commenter's suggested edit has been incorporated into the text.
- 135-29:** The commenter's suggested edit has been incorporated into the text.
- 135-30:** The CPUC notes the commenter's suggested edits to Figure 2-1. However, as this change is not related to a deficiency in the analysis presented in the EIR, the CPUC has declined to make this change.

- 135-31:** The CPUC notes the commenter’s suggested edits to Figure 2-2i. However, as this change is not related to a deficiency in the analysis presented in the EIR, the CPUC has declined to make this change.
- 135-32:** The commenter's suggested edit has been incorporated into the text.
- 135-33:** The commenter's suggested edit has been incorporated into the text.
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- 135-74:** The commenter's suggested edit has been incorporated into the text.
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- 135-84:** The commenter's suggested edit has been incorporated into the text.
- 135-85:** The commenter's suggested edit has been incorporated into the text.
- 135-86:** The commenter's suggested edit has been incorporated into the text.
- 135-87:** The commenter has requested an edit to Figure 3-2 with respect to Alternative VIG C. Note that although the figure shows the alternative beginning at Love Lane, it is understood that the alternative would connect to the VIG 5. The commenter has not alleged any deficiency in the environmental analysis; therefore, this edit was not made. See revisions to Chapter 5.0, Comparison of Alternatives.
- 135-88:** The commenter's suggested edit has been incorporated into the text.
- 135-89:** The commenter's suggested edit has been incorporated into the text.
- 135-90:** The commenter's suggested edit has been incorporated into the text.
- 135-91:** The commenter's suggested edit has been incorporated into the text.
- 135-92:** The commenter's suggested edit has been incorporated into the text.
- 135-93:** The commenter's suggested edit has been incorporated into the text.

- 135-94:** The commenter's suggested edit has been incorporated into the text.
- 135-95:** The commenter's suggested edit has been incorporated into the text.
- 135-96:** The CPUC's aesthetics specialist has determined that dark materials would more effectively mitigate the impact. Therefore, these changes were not incorporated.
- 135-97:** The CPUC has reviewed the impact determination in more detail and determined that while undergrounding would reduce the impact in certain locations, the vividness, intactness, and unity along VIG 2 and Hwy 74 varies. In addition, there are several areas where large geologic features are present, which would require blasting and removal to place the line underground. Therefore, undergrounding would result in a reduction in the existing vividness, intactness, and unity in those locations and would result in a significant impact, offsetting the reduction in significant impacts elsewhere. Considering that undergrounding would reduce the impact in some locations while increasing impacts in other locations, the CPUC has determined that the applicant's suggested use of wood poles would, on balance, provide a better method of reducing the aesthetic impact to less than significant with the exception of the approximately 1.5-mile section of the segment located between approximately Crumpton Road and Conard Avenue. Views looking west from this section of the highway include the forested mountains of the Angeles National Forest in the distance and diverse rock outcrops and vegetation in the foreground, which together provide strong visual interest. Therefore, undergrounding the transmission line in this section would help better protect State Scenic Highway eligibility. The applicant's suggested revisions, with modifications, have been made to the text, and changes have been made to Impact AES-2 (VIG).
- 135-98:** The commenter's suggested edit has been incorporated into the text.
- 135-99:** The commenter's suggested edit has been incorporated into the text.
- 135-100:** The text has been edited to remove the reference to the darkening agent. It also has been revised to show that this will be applicable unless otherwise required by MM AES-7 or MM AES-8, as both have the potential to refer to the towers - AES-7 referring to the ASP project and AES-8 to the VIG project. Text has been deleted per the comment regarding the line that begins "As applicable, use steel for switchrack...."
- 135-101:** The CPUC concurs that setbacks equivalent to an average of 20 feet would provide flexibility during project siting. In addition, the second bullet has been added with modifications allowing for CPUC approval. The third bullet cannot be struck from the mitigation measure as landscaping is required to reduce the impact; however, the operational requirements have been deleted. Per response to comment 248-19, coordination with the City of Lake Elsinore is required for landscaping input along Lake Street.
- 135-102:** The commenter's suggested edit has been incorporated into the text.
- 135-103:** The commenter's suggested edit has been incorporated into the text.
- 135-104:** The commenter's suggested edit has been incorporated into the text.

**135-105:** The commenter's suggested edit has been incorporated into the text.

**135-106:** The commenter's suggested edit has been incorporated into the text. MM AES-6 was not crucial to showing that the impact would be reduced to less than significant and due to requirements by the CPUC to limit grading cut and fill. The text also was revised per comment 135-105 to show that Project Commitment D would require revegetation. Other parts of the text that reference MM AES-6 were deleted.

**135-107:** The commenter's suggested edit has been incorporated into the text.

**135-108:** The text of AES-8 was revised to remove the use of darkening agents (as well as in other relevant locations within the section). The darkening agents do not necessarily have the potential to reduce impacts to less than significant, but the use of colors in general to help the structures to blend into their natural surroundings is a valid measure to reduce the impact of the towers. Depending on the backdrop, color can lessen the overall impact.

**135-109:** The commenter's suggested edit has been incorporated into the text.

**135-110:** The commenter's suggested edit has been incorporated into the text.

**135-111:** The text was revised to include wood, self-weathering, and galvanized steel (with appropriate colors, finishes, and textures). This was carried throughout the section. Some research does indicate that self-weathering poles have potential issues with moisture; however, in some locations, these may still be considered. By adding in all three options, this will allow an engineering decision to be made.

**135-112:** The commenter's suggested edit has been incorporated into the text.

**135-113:** The commenter's suggested edit has been incorporated into the text.

**135-114:** The commenter's suggested edit has been incorporated into the text.

**135-115:** The commenter's suggested edit has been incorporated into the text.

**135-116:** The commenter's suggested edit has been incorporated into the text.

**135-117:** Although the use of certain equipment may not currently be required during construction, the CPUC has opted to retain local provisions for informational purposes in the event that such equipment is determined to be needed during construction.

**135-118:** The commenter's suggested edit has been incorporated into the text.

**135-119:** See response to comment 135-117.

**135-120:** The commenter's suggested edit has been incorporated into the text.

**135-121:** See response to comment 135-411.

**135-122:** MM AQ-3 has been modified based on input from the applicant. The previous measure has been replaced with the following language:

**MM AQ-3: Dust Control Plan.** The applicant shall prepare a Dust Control Plan based on final engineering and pursuant to Rule 403 of the SCAQMD. The applicant shall submit the Plan to the CPUC prior to commencement of ground disturbing activities.

**135-123:** See response to comment 135-117.

**135-124:** The commenter's suggested edit has been incorporated into the text.

**135-125:** The commenter's suggested edit has been incorporated into the text.

**135-126:** The Western Riverside County Regional Conservation Association administers the MSHCP; therefore, MSHCP was replaced with RCA.

**135-127:** Text has been amended to be more consistent with description provided by the publication “Preliminary Description of the Terrestrial natural Communities of California.”

**135-128:** Text has been amended to be more consistent with description provided by the publication “Preliminary Description of the Terrestrial natural Communities of California.”

**135-129:** For the purposes of this EIR, surveys undertaken by methods outlined by the Western Riverside MSHCP are considered to be “focused” surveys. As such, the footnote in question was revised to read:

“Focused wildlife surveys are those undertaken according to methods outlined by the Western Riverside MSCHP (e.g the Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area [County of Riverside 2006]). Protocol-level surveys are those undertaken according to standards or guidelines published by wildlife agencies (e.g., CDFW, USFWS) or professional wildlife organizations (e.g., California Burrowing Owl Consortium).”

**135-130:** Comment noted. The DEIR figure has been modified.

**135-131:** Regional Water Quality Control Board (RWQCB) has been replaced with “State Water Resources Control Board (SWRCB)” to more accurately depict which entity has authority over administering the Section 401 Water Quality Certification Program.

**135-132:** The commenter's suggested edit has been incorporated into the text.

**135-133:** The commenter's suggested edit has been incorporated into the text.

- 135-134:** The commenter's suggested edit has been incorporated into the text.
- 135-135:** The commenter's suggested edit has been incorporated into the text.
- 135-136:** The commenter's suggested edit has been incorporated into the text.
- 135-137:** The commenter's suggested edit has been incorporated into the text.
- 135-138:** The commenter's suggested edit has been incorporated into the text.
- 135-139:** The commenter's suggested edit has been incorporated into the text.
- 135-140:** Added text from the MSHCP regarding the treatment of critical habitat to Section 4.4.2.3, as well as additional text to Section 4.4.4.2 to further clarify that, while not necessary, Project Commitments and Mitigation Measures would also be implemented to minimize impacts.
- 135-141:** According to the biological technical reports prepared for the Proposed Project (AMEC 2014a and AMEC 2014b) there were no observations of the federally endangered subspecies southwestern willow flycatcher (*Empidonax traillii extimus*). There were, however, observations of the willow flycatcher (*Empidonax traillii*), which is listed as a California Endangered species. Willow flycatcher is already listed in Table 4.4-2; therefore, no changes were made to the text.
- 135-142:** The commenter's suggested edit has been incorporated into the text.
- 135-143:** The text was amended to clarify the status of the PSE process and the projects' coverage under the MSHCP.
- 135-144:** SCE is correct that take of Stephen's kangaroo rat (SKR) would be covered for the entire project, according to the final executing agreement issued by the Riverside County Conservation Agency (RCA) in October 2012. Text has been revised accordingly.
- 135-145:** The commenter's suggested edit has been incorporated into the text.
- 135-146:** The commenter's suggested edit has been incorporated into the text.
- 135-147:** The commenter's suggested edit has been incorporated into the text.
- 135-148:** The commenter's suggested edit has been incorporated into the text.
- 135-149:** Preconstruction surveys are meant to target any special status species with a potential to occur along a particular project component during construction. Surveys are typically completed within two weeks (14 days) of ground disturbing activities, in order to determine if there are any special status species present, and are completed subsequent to any protocol-level or focused surveys for individual species that are required to be completed according to the MSHCP. The surveys will inform what actions will need to be taken by biological monitors

(i.e., flagging burrows or plants for avoidance, relocating species, etc.).

Text has been revised to include the schedule at which preconstruction surveys should occur, “within two weeks of the start of construction”.

**135-150:** Preconstruction surveys should be completed within 2 weeks of construction, and monitoring would occur subsequent to those surveys. Text has been revised to include documentation of daily monitoring activities in a logbook.

**135-151:** The commenter's suggested edit has been incorporated into the text.

**135-152:** Text has been revised to be more consistent with the MSHCP Species Specific mitigation measures.

**135-153:** The text has been updated to apply to “those areas not covered under the MSHCP” rather than “outside MSHCP boundaries.”

**135-154:** Any vehicle or piece of equipment entering work areas has the potential to carry or spread invasive species. SCE's edits to text regarding the use of straw or hay bales does not change the context of the text, as is; therefore, no edits incorporated.

**135-155:** The commenter's suggested edit has been incorporated into the text.

**135-156:** The citation CDFG 2012 refers to the Staff Report on Burrowing Owl Mitigation. At the time of publication, what is now known as the California Department of Fish and Wildlife, was known as the California Department of Fish and Game; therefore, the citation will remain unchanged.

While the buffer distance during the non-nesting season (160 feet) is consistent with CDFG 2012 recommendations, establishing buffers of 500 feet during the nesting season is not consistent with the document. During the nesting season there are varying buffer distances based on the level of disturbance and time of year, with a minimum buffer size of 656 feet. Therefore, text remains unchanged, referencing the buffer distances to adhere to in CDFG 2012.

Text regarding BDESP has been added in an effort to be more consistent with the MSHCP.

**135-157:** Text has been amended to be more consistent with the current process of obtaining PSE status and the issuance of a Certificate of Inclusion.

**135-158:** The commenter's suggested edit has been incorporated into the text.

**135-159:** The commenter's suggested edit has been incorporated into the text.

**135-160:** MM BR-15 has been retained. See response to comment 135-161.

- 135-161:** The applicant is required to comply with the federal CWA. However, CEQA does not prohibit including compliance with a law as a mitigation measure. Note that SCE must also submit a copy of the Storm Water Pollution Prevention Plan (SWPPP) to the CPUC so that CPUC can ensure mitigation of impacts. Therefore, MM BR-15 has been retained, albeit in modified form.
- 135-162:** The commenter's suggested edit has been incorporated into the text.
- 135-163:** The commenter's suggested edit has been incorporated into the text.
- 135-164:** The commenter's suggested edit has been incorporated into the text.
- 135-165:** The commenter's suggested edit has been incorporated into the text.
- 135-166:** The commenter's suggested edit has been incorporated into the text.
- 135-167:** The commenter's suggested edit has been incorporated into the text.
- 135-168:** The commenter's suggested edit has been incorporated into the text.
- 135-169:** The commenter's suggested edit has been incorporated into the text.
- 135-170:** The phrase “(including upland areas and drainages)” has been removed from the first paragraph of Impact BR-3 (ASP). However, SCE does not provide any reasoning or justification for the removal of the last sentence of the second paragraph; therefore, this change has not been made.
- 135-171:** See response to comment 135-161.
- 135-172:** See response to comment 135-161.
- 135-173:** Text has been amended to clarify that the entire project would be covered under the SKR Habitat Conservation Plan (HCP), and that an agreement is to be finalized between SCE and RCA to allow for coverage of those areas outside of the MSHCP boundaries under the MSHCP.
- 135-174:** The commenter's suggested edit has been incorporated into the text.
- 135-175:** The commenter's suggested edit has been incorporated into the text.
- 135-176:** Definitions of resource types are already included in the section. Therefore, this change has not been made.
- 135-177:** The definition of historic resources is considered adequate and has not been modified.
- 135-178:** The commenter's preference for the term “historical” has been noted. See response to comment 135-177.

**135-179:** Paleo sensitivity is included in Table 4.5-6. The CPUC recommends that such a map be included in the Paleontological Resource Monitoring Plan (MM CR-4) at the applicant's option.

**135-180:** The commenter's suggested edit has been incorporated into the text.

**135-181:** Due to the potential for undiscovered resources, the CPUC has opted to retain this language; however, see response to comment 135-180.

**135-182:** The commenter's suggested edit has been incorporated into the text.

**135-183:** The CPUC has opted to retain this language for clarity.

**135-184:** The commenter's suggested edit has been incorporated into the text.

**135-185:** The commenter's suggested edit has been incorporated into the text.

**135-186:** The commenter's suggested edit has been incorporated into the text.

**135-187:** The commenter's suggested edits have been incorporated with modifications. In particular, the words "or to the extent possible to avoid" have been omitted and the following phrase has been inserted: "No work will resume in the area until the qualified archaeologist and the CPUC agree to an appropriate buffer or until mitigation has been completed."

**135-188:** See response to comment 135-178.

**135-189:** See response to comment 135-178.

**135-190:** See response to comment 135-178.

**135-191:** The CPUC has opted to retain most of the original language due to the potential for encountering cultural resources in certain areas; however, the last sentence has been added to the measure with modifications.

**135-192:** The CPUC concurs that a level of flexibility is necessary to modify work areas in the event of unforeseeable conditions. The text in question has been modified to clarify that 30 days' notice shall be given prior to the start of construction as opposed to the start of construction or excavation in a particular location; however, the applicant shall make a good faith best effort to schedule construction when a monitor is available.

**135-193:** The commenter's suggested edit could lead to a delay in halting work in the event of an unanticipated discovery, which could result in damage to a resource. Therefore, this change has been rejected.

**135-194:** The CPUC concurs that MM CR-3 is duplicative of MM CR-1b. Therefore, MM CR-3 has been deleted.

**135-195:** The commenter's suggested edit has been incorporated into the text.

**135-196:** Although the CPUC concurs that the likelihood of observing and recovering significant fossils from drilling and augering activities is low, areas requiring monitoring will be further detailed in the PRMP. Therefore, the CPUC has opted not to omit drilling activities at this time.

**135-197:** The commenter's suggested edit has been incorporated into the text.

**135-198:** The commenter's suggested edit has been incorporated into the text.

**135-199:** The commenter's suggested edit has been incorporated into the text.

**135-200:** The commenter's suggested deletion has no bearing on the analysis in the EIR and does not indicate an error or omission. Therefore, the text has been retained.

**135-201:** The commenter's suggested edit has been incorporated into the text.

**135-202:** See response to comment 135-178.

**135-203:** The commenter's suggested edit has been incorporated into the text.

**135-204:** The commenter's suggested edit has been incorporated into the text.

**135-205:** The commenter's suggested edit has been incorporated into the text.

**135-206:** The commenter's suggested edit has been incorporated into the text.

**135-207:** The commenter's suggested edit has been incorporated into the text.

**135-208:** The commenter's suggested edit has been incorporated into the text.

**135-209:** The commenter's suggested edit has been incorporated into the text.

**135-210:** The commenter's suggested edit has been incorporated into the text.

**135-211:** The commenter's suggested edit has been incorporated into the text.

**135-212:** The commenter's suggested edit has been incorporated into the text.

**135-213:** The commenter's suggested edit has been incorporated into the text with modifications, and the impact determination has been changed to less than significant consistent with the applicant's revisions to Project Commitment B.

- 135-214:** The commenter's suggested edit has been incorporated into the text. MM GE-1 has been deleted.
- 135-215:** MM BR-15 has been modified per response to comment 135-161. Therefore, suggested edit was not incorporated.
- 135-216:** MM BR-15 has been modified per response to comment 135-161. Therefore, while certain revisions have been made to the text, the suggested edit was not incorporated.
- 135-217:** See response to comment 135-161.
- 135-218:** The commenter's suggested edit has been incorporated into the text.
- 135-219:** The commenter's suggested edit has been incorporated into the text.
- 135-220:** The commenter's suggested edit has been incorporated into the text.
- 135-221:** The commenter's suggested edit has been incorporated into the text.
- 135-222:** The commenter's suggested edit has been incorporated into the text.
- 135-223:** The commenter's suggested edit has been incorporated into the text.
- 135-224:** The text has been modified to reference Project Commitment B, and references to MM GE-1 have been deleted. The impact determination has been changed to less than significant.
- 135-225:** The commenter's suggested edit has been incorporated into the text.
- 135-226:** See response to comment 135-161. The commenter's suggested edit was not incorporated.
- 135-227:** See response to comment 135-161.
- 135-228:** See response to comment 135-161.
- 135-229:** See response to comment 135-161.
- 135-230:** See response to comment 135-161.
- 135-231:** The commenter's suggested edit has been incorporated into the text.
- 135-232:** The commenter's suggested edit has been incorporated into the text.
- 135-233:** The commenter's suggested edit has been incorporated into the text.

- 135-234:** The commenter's suggested edit has been incorporated into the text.
- 135-235:** The commenter's suggested edit has been incorporated into the text.
- 135-236:** The commenter's suggested edit has been incorporated into the text.
- 135-237:** The commenter's suggested edit has been incorporated into the text.
- 135-238:** The commenter's suggested edit has been incorporated into the text.
- 135-239:** The commenter's suggested edit has been incorporated into the text.
- 135-240:** The commenter's suggested edit has been incorporated into the text.
- 135-241:** Comment noted. Edit has been incorporated into the DEIR.
- 135-242:** The text related to EMF, which was previously located in Section 4.8.1.6, has been relocated to Section 2.5.4, Electric and Magnetic Fields, per the commenter's suggested revision.
- 135-243:** The commenter's suggested edit has been incorporated into the text.
- 135-244:** Comment noted. This edit has been incorporated into the DEIR.
- 135-245:** Comment noted.
- 135-246:** Comment noted. This edit has been incorporated into the DEIR.
- 135-247:** The commenter's suggested edit has been incorporated into the text with modifications for clarity.
- 135-248:** The commenter's suggested edit was not incorporated into the text. The contingency plan was developed to address contamination that was not found during previous assessments and not anticipated to be found during construction.
- 135-249:** The commenter's suggested edit was not incorporated into the text, but the section was modified for clarity.
- 135-250:** The commenter's suggested edit has been incorporated into the text.
- 135-251:** The commenter's suggested edit has been incorporated into the text.
- 135-252:** MM HZ-1 has been removed, and its components have generally been moved to BR-15 per statements made by the commenter. SCE would be required to prepare the SWPPP in accordance with all applicable federal, state, and local regulations, and a copy would be submitted to the CPUC prior to construction.

- 135-253:** Although the fourth item listed in MM HZ-2 is similar to MM WQ-4, it is essential to retain this item as part of MM HZ-2. Addressing dewatering procedures and disposal requirements is essential to the Contaminated Soil/Groundwater Contingency Plan. Moreover, the fourth item in MM HZ-2 refers to storage, testing, treatment and dewatering BMPs set forth in the applicant's SWPPP whereas MM WQ-4 only pertains to groundwater disposal and does not reference the SWPPP. Therefore, the commenter's suggested edit was not incorporated into the text.
- 135-254:** The commenter's suggested edit has been incorporated into the text.
- 135-255:** The commenter's suggested edit has been incorporated into the text.
- 135-256:** MM HZ-3 requires the applicant to contact affected private landowners to determine if underground facilities may be impacted by construction. In addition, the “applicant will immediately notify the owner of underground facilities if they have been damaged or dislocated during construction.” Therefore, portions of MM HAZ-3 have been retained.
- 135-257:** MM HZ-1 has been deleted and its elements have been incorporated into MM BR-15 (SWPPP). Therefore, edits were made to the text but differ slightly from the applicant’s suggested edits.
- 135-258:** The commenter's suggested edit has been incorporated into the text.
- 135-259:** The commenter's suggested edit has been incorporated into the text with modifications.
- 135-260:** The commenter's suggested edit has been incorporated into the text.
- 135-261:** The commenter's suggested edit has been incorporated into the text.
- 135-262:** The commenter's suggested edit has been incorporated into the text with modifications for clarity. MM BR-15 has been retained.
- 135-263:** The commenter's suggested edit was not incorporated into the text. The contingency plan was developed to address contamination that was not found during previous assessments and not anticipated to be found during construction.
- 135-264:** The commenter's suggested edit has been incorporated into the text with modifications. MM HZ-1 has been incorporated into MM BR-15.
- 135-265:** See response to comment 135-264.
- 135-266:** See response to comment 135-264.
- 135-267:** The commenter's suggested edit was incorporated into the text though modified for clarity.
- 135-268:** See response to comment 135-264.

**135-269:** The reference to MM HZ-3 was not deleted because this mitigation measure has been retained, albeit in modified form. See also response to comment 135-264.

**135-270:** See response to comment 135-264.

**135-271:** The commenter's suggested edit has been incorporated into the text.

**135-272:** The commenter's suggested edit has been incorporated into the text.

**135-273:** The commenter's suggested edit has been incorporated into the text.

**135-274:** The commenter's suggested edit has been incorporated into the text.

**135-275:** The commenter's suggested edit has been incorporated into the text with modifications for clarity.

**135-276:** The commenter's suggested edit has been incorporated into the text.

**135-277:** The commenter's suggested edit has been incorporated into the text.

**135-278:** The commenter's suggested edit has been incorporated into the text.

**135-279:** The commenter's suggested edit has been incorporated into the text.

**135-280:** The commenter's suggested edit has been incorporated into the text with modification for clarity.

**135-281:** MM HZ-1 was been eliminated per response to comment 135-252 in favor of MM BR-15.

**135-282:** See response to comment 135-252.

**135-283:** The commenter's suggested edit has been incorporated into the text.

**135-284:** The commenter's suggested edit has been incorporated into the text.

**135-285:** The commenter's suggested edit has been incorporated into the text.

**135-286:** A portion of the commenter's suggested edit has been incorporated into the text.

**135-287:** The commenter's suggested edit has been incorporated into the text.

**135-288:** The commenter's suggested edit has been incorporated into the text.

- 135-289:** The commenter's suggested edit has been incorporated into the text.
- 135-290:** The commenter's suggested edit has been incorporated into the text.
- 135-291:** The commenter's suggested edit has been incorporated into the text.
- 135-292:** The commenter's suggested edit has been incorporated into the text.
- 135-293:** The commenter's suggested edit has been incorporated into the text.
- 135-294:** The commenter's suggested edit has been incorporated into the text with modifications for clarity.
- 135-295:** The commenter's suggested edit has been incorporated into the text.
- 135-296:** The commenter's suggested edit has been incorporated into the text.
- 135-297:** See response to comment 135-252.
- 135-298:** See response to comment 135-252.
- 135-299:** Although not all wetland features may be jurisdictional, the text has been updated to read 1.49 acres, rather than 1.71, per the temporary impacts identified in Table 4 in Appendix G.
- 135-300:** The commenter's suggested edit has been incorporated into the text.
- 135-301:** The commenter's suggested edit has been incorporated into the text.
- 135-302:** The commenter's suggested edit has been incorporated into the text.
- 135-303:** The commenter's suggested edit has been incorporated into the text.
- 135-304:** The commenter's suggested edit has been incorporated into the text.
- 135-305:** The commenter's suggested edit has been incorporated into the text.
- 135-306:** The commenter's suggested edit has been incorporated into the text.
- 135-307:** The commenter's suggested edit has been incorporated into the text.
- 135-308:** The commenter's suggested edit has been incorporated into the text.
- 135-309:** The commenter's suggested edit has been incorporated into the text.

- 135-310:** The commenter's suggested edit has been incorporated into the text.
- 135-311:** The commenter's suggested edit has been incorporated into the text.
- 135-312:** The commenter's suggested edit has been incorporated into the text.
- 135-313:** The commenter's suggested edit has been incorporated into the text.
- 135-314:** The commenter's suggested edit has been incorporated into the text.
- 135-315:** The commenter's suggested edit has been incorporated into the text.
- 135-316:** Portions of this text were incorporated into the mitigation measure. The text restricting use of equipment to less than 4 hours per day was removed per response to comment 135-410. The text regarding the type of engines was revised to include where feasible and available. Where the argument of the FTA usage of 90 dBA was used - this was taken as a replacement to 75 dBA; construction staggering was removed; and those portions that were repetitive of Commitment H were removed.
- 135-317:** The commenter's suggested edit has been incorporated into the text.
- 135-318:** The commenter's suggested edit has been incorporated into the text.
- 135-319:** The commenter's suggested edit has been incorporated into the text.
- 135-320:** The commenter's suggested edit has been incorporated into the text.
- 135-321:** The commenter's suggested edit has been incorporated into the text.
- 135-322:** The commenter's suggested edit has been incorporated into the text. This is consistent with Section 2.6.
- 135-323:** The commenter's suggested edit has been incorporated into the text.
- 135-324:** The text regarding the policy was updated to account for the Riverside County Noise Ordinance (<http://www.rivcocob.org/ords/800/847.pdf>). As the Lmax is actually 55 dBA for nighttime—10 PM to 7 AM for light industrial—this was clarified in the text.
- 135-325:** The commenter's suggested edit has been incorporated into the text.
- 135-326:** Text added to show that refers to Riverside County; the text remains though as this is the city code for Menifee. Remaining portion deleted per text within comment.
- 135-327:** The commenter's suggested edit has been incorporated into the text.

**135-328:** The commenter's suggested edit has been incorporated into the text.

**135-329:** The commenter's suggested edit has been incorporated into the text.

**135-330:** The commenter's suggested edit has been incorporated into the text.

**135-331:** The commenter's suggested edit has been incorporated into the text.

**135-332:** The commenter's suggested edit has been incorporated into the text.

**135-333:** The commenter's suggested edit has been incorporated into the text.

**135-334:** The commenter's suggested edit has been incorporated into the text.

**135-335:** The commenter's suggested edit has been incorporated into the text.

**135-336:** The commenter's suggested edit has been incorporated into the text.

**135-337:** The commenter's suggested edit has been incorporated into the text.

**135-338:** The commenter's suggested edit has been incorporated into the text.

**135-339:** The commenter's suggested edit has been incorporated into the text.

**135-340:** The commenter's suggested edit has been incorporated into the text.

**135-341:** The commenter's suggested edit has been incorporated into the text.

**135-342:** The commenter's suggested edit has been incorporated into the text.

**135-343:** The CPUC determined that the text was appropriate as written, and therefore, no changes were made to the text.

**135-344:** The commenter's suggested edit has been incorporated into the text.

**135-345:** The commenter's suggested edit has been incorporated into the text.

**135-346:** The commenter's suggested edit has been incorporated into the text.

**135-347:** The commenter's suggested edit has been incorporated into the text.

**135-348:** The commenter's suggested edit has been incorporated into the text.

**135-349:** The commenter's suggested edit has been incorporated into the text.

**135-350:** The commenter's suggested edit has been incorporated into the text.

**135-351:** As part of the encroachment permit, a traffic control plan will need to be submitted. The text was revised to show that this mitigation measure addresses this need.

**135-352:** The commenter's suggested edit has been incorporated into the text.

**135-353:** The wording of this mitigation measure was revised to show that a plan will be prepared as part of the encroachment permit. The text was also revised to show that the plan may include some of the suggested work times. While this is likely required for the encroachment permit, the inclusion as a mitigation measure reinforces the reduction in potential impacts to local traffic and transportation systems.

**135-354:** The commenter's suggested edit has been incorporated into the text.

**135-355:** Per review of this measure, no changes were made. The measure requires only that the applicant provide notification to the CPUC that consultation would occur with the FAA and thereby that appropriate actions would be taken so as to avoid a hazard.

**135-356:** The commenter's suggested edit has been incorporated into the text. Additional edits made throughout the section clarify that this applies to private roads. Text also was included to show that this is part of local agreements.

**135-357:** The alternatives analyses for VIG has been modified. See revised Section 5.2.1.

**135-358:** The commenter's suggested edit has been incorporated into the text.

**135-359:** The commenter's suggested edit has been incorporated into the text.

**135-360:** The commenter's suggested edit has been incorporated into the text.

**135-361:** The commenter's suggested edit has been incorporated into the text.

**135-362:** The commenter's suggested edit has been incorporated into the text.

**135-363:** The text of Section 5.2.5 under Other Resources Areas has been revised to reflect increased impacts.

**135-364:** The table has been revised based on edits made to the text by various commenters.

**135-365:** The table has been revised based on edits made to the text by various commenters.

**135-366:** The table has been revised based on edits made to the text by various commenters.

- 135-367:** The table has been revised based on edits made to the text by various commenters.
- 135-368:** The table has been revised based on edits made to the text by various commenters.
- 135-369:** The table has been revised based on edits made to the text by various commenters.
- 135-370:** The text has been revised based on edits made to the text by various commenters.
- 135-371:** The commenter's suggested edits have been incorporated into the text.
- 135-372:** The commenter's suggested edit has been incorporated into the text.
- 135-373:** The commenter's suggested edit has been incorporated into the text.
- 135-374:** The commenter's suggested edit has been incorporated into the text.
- 135-375:** The commenter's suggested edit has been incorporated into the text.
- 135-376:** The commenter's suggested edit has been incorporated into the text.
- 135-377:** The commenter's suggested edit has been incorporated into the text.
- 135-378:** The commenter's suggested edit has been taken into consideration. Due to comments received by various commenters, the section has been revised. See the revised text in Section 5.3.4.
- 135-379:** See response to comment 135-378.
- 135-380:** See response to comment 135-378.
- 135-381:** See response to comment 135-378.
- 135-382:** See response to comment 135-378.
- 135-383:** See response to comment 135-378.
- 135-384:** See response to comment 135-378.
- 135-385:** See response to comment 135-378.
- 135-386:** See response to comment 135-378.
- 135-387:** The commenter's preference for the term “historical” has been noted. See response to comment 135-77.

**135-388:** The mitigation measures have been updated based on input from the commenter and based on comments from the Pechanga Tribe. Therefore, this edit was not incorporated.

**135-389:** See response to comment 135-389.

**135-390:** The commenter's suggested edit has been incorporated into the text.

**135-391:** The commenter's suggested edit has been incorporated into the text.

**135-392:** The commenter's suggested edit has been incorporated into the text.

**135-393:** The CPUC has retained MM HZ-3 and eliminated MM HZ-1 in favor MM BR-15. Therefore, appropriate changes have been incorporated into the text.

**135-394:** See response to comment 135-393.

**135-395:** The commenter's suggested edit has been incorporated into the text.

**135-396:** The commenter's suggested edit has been incorporated into the text.

**135-397:** Changes have made in accordance with the edits suggested by the commenter as well as other commenters on the DEIR. Therefore, the changes included in Attachment F were not incorporated unless specified in responses to other comments.

**135-398:** Comment noted. The text related to Alternative DD has been revised based on input from the commenter as well as other commenters. Upon closer review, the CPUC concurs that Alternative DD is no longer the Environmentally Superior Alternative. See revisions to the Alternative DD discussion in Chapter 5.0, Comparison of Alternatives.

**135-399:** See response to comment 135-398.

**135-400:** Refer to responses to comments 135-409, 135-410, and 135-411.

**135-401:** Comment noted.

**135-402:** Regarding the project objectives, see Appendix K. See response to comment 135-398.

**135-403:** See response to comment 135-402.

**135-404:** Upon consideration of Alternative DD with the Nevada Hydro LEAPS project in the cumulative analysis, Alternative DD is no longer considered the Environmentally Superior Alternative. See Section 5.3.2 in Chapter 5.0, Comparison of Alternatives. The Environmentally Superior Alternative is discussed in Section 5.3.4.

**135-405:** See response to comment 113-8.

**135-406:** See response to comment 113-8.

**135-407:** See response to comment 113-8.

**135-408:** See response to comment 113-8.

**135-409:** See responses to comments 135-410, 135-411, and 135-97.

**135-410:** Upon review, the CPUC concurs that restricting equipment usage to four hours per day would be infeasible due to the reasons cited by the commenter, and the four-hour limit was removed from the mitigation measure. Note that the removal of the four-hour restriction does not increase the severity of the impact, and no changes have been made to the impact determinations as a result of its removal. While reducing the use of equipment to four hours per day would reduce the day-to-day nuisance experienced by sensitive receptors, the restriction would result in a doubling of the construction period. If the original measure was implemented, receptors would experience the lessened day-to-day nuisance for twice as long, thus cancelling the benefits of the measure. Arguably, lengthening the construction period might be considered a greater nuisance by various receptors, particularly because the restriction would not reduce impacts to less than significant. As a result, there is no net benefit to restricting the use of heavy equipment to four hours per day, and removing this restriction has no bearing on the impact determinations in the EIR.

**135-411:** The intent of the mitigation measures is to require the purchase of offsets in order to reduce impacts. The intent of the measures is not to require the purchase of a specific offset if another offset would also reduce the impact to less than significant at a lesser cost. Therefore, the text of MM AQ-2 and MM AQ-5 has been modified to give the applicant the flexibility to purchase offsets from a variety of programs.

**135-412:** Comment noted. DEIR text revised.

## Private Citizens

### [A – B](#)

#### **Adams, Jennifer (Letter # 208)**

**208-1:** See response to comment 114-1.

#### **Agajanian, Tara (Letter # 130)**

**130-1:** See response to comment 114-1.

#### **Angier, Dorri (Letter # 131)**

**131-1:** The commenter’s general support for undergrounding has been documented and will be taken into account by decision makers. Regarding the commenter's statements about fire and other possible health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Ann Matilla, Lennox (Letter # 209)**

**209-1:** See response to comment 114-1.

**Aplin, Beth (Letter # 210)**

**210-1:** See response to comment 114-1.

**210-2:** Regarding noise impacts, refer to Section 4.11, Noise and Vibration. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities.

**210-3:** See response to comment 128-1.

**210-4:** See response to comment 128-1.

**Appleby, James (Letter # 88)**

**88-1:** See response to comment 73-1.

**Appleman, Catherine (Letter # 381)**

**381-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Arcila, Veronica (Letter # 211)**

**211-1:** See response to comment 132-1.

**Ax, Rebecca (Letter # 132)**

**132-1:** The commenter’s general opposition for the project and support of undergrounding alternatives has been documented and will be taken into account by decision makers. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Bailey, Cory (Letter # 133)**

**133-1:** Regarding safety and other hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics. Regarding economic activity, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding undergrounding alternatives refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. Regarding allegations that the EIR is flawed, the commenter has not provided specific examples of flawed analyses from the DEIR. Therefore, the commenter's opinion that the DEIR is flawed has been noted, but no further response is required.

**Ballantyne, (Letter # 212)**

**212-1:** See response to comment 133-1 and 134-1.

**Barton, Doniphan (Letter # 213)**

**213-1:** See response to comment 133-1 and 134-1.

**Baulk, D'Amileau (Letter # 214)**

**214-1:** See response to comment 133-1 and 134-1.

**Baumann, Allison (Letter # 215)**

**215-1:** See response to comment 133-1 and 134-1.

**Bear, Bruce and Peggy (Letter # 22)**

**22-1:** Visual Impacts are assessed in Section 4.1, Aesthetics. Per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Your opposition to above ground transmission lines has been noted. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Beck, Kathleen (Letter # 86)**

**86-1:** See response to comment 73-1.

**Behany, Tiffany & Bill (Letter # 216)**

**216-1:** See response to comment 114-1.

**Bell, Cindy (Letter # 10)**

**10-1:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. The commenter's general support of undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**232-1:** See response to comment 128-1 and 132-1.

**Bell, Robert (Letter # 134)**

**134-1:** Regarding safety, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding impacts on public views, refer to Section 4.1, Aesthetics. Regarding property values and economic activity, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Biddle, Christa (Letter # 217)**

**217-1:** See response to comment 132-1 and 133-1.

**Blair, Noreen (Letter # 218)**

**218-1:** See response to comment 120-2, 128-1, and 132-1. Regarding habitat, see Section 4.4, Biological Resources. The applicant's biological survey data is included in Appendix E.

**Blue, Cassie (Letter # 137)**

**137-1:** See response to comment 114-1.

**Bollin, Rachel (Letter # 66)**

**66-1:** The commenter's opposition to the proposed project has been noted and will be taken into account by decision makers. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts.

**Booze, April (Letter # 38)**

**38-1:** Your opposition to above ground power lines has been noted. Regarding impacts related to public views in the project area, refer to Section 4.1, Aesthetics. Regarding negative impacts on land values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding impacts related to earthquakes, refer to Section 4.13, Geology and Mineral

Resources, and Section 4.13, Public Services and Utilities. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Bowen, Dawn (Letter # 386)**

**386-1:** Impacts related to aesthetics are discussed in detail in Section 4.1, Aesthetics. With respect to the potential economic implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines § 15131. With respect to alternative pathways, the commenter did not indicate which alternative route she was referring too. A discussion of alternatives paths may be found in Chapter 3.0, Description of Alternatives and Chapter 5.0, Comparison of Alternatives, as well as Appendix D of the EIR.

**Bradley, Julie (Letter # 219)**

**219-1:** See response to comment 114-1.

**Bradshaw, Andrea (Letter # 114)**

**114-1:** Your support for VIG Alternative M and your opposition for the proposed Alberhill project site have been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Bradshaw, Nicholas (Letter # 115)**

**115-1:** See response to comment 114-1.

**Brisken, Dan (Letter # 48)**

**48-1:** Regarding water use, see Section 4.13, Public Services and Utilities. In particular, Impact PS-4 (VIG and ASP) discuss available water supplies in the project area. The Elsinore Valley Municipal Water District has indicated ample water supplies to provide temporary water supply during construction. Your opposition to the project has been noted and will be taken into account by decision makers.

**Bryant, Cheryl (Letter # 54)**

**54-1:** The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Bullock, Jolene, Woody, and Michael (Letter # 279)**

**279-1:** See response to comment 114-1.

**Bustamante, Darlene (Letter # 220)**

**220-1:** See response to comment 120-2.

**Camarena, Mayra (Letter # 221)**

**221-1:** See response to comment 132-1 and 133-1.

**Campos, Mario (Letter # 207)**

**207-1:** See response to comment 114-1.

**Cane, Pam & Kevin (Letter # 368)**

**368-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Carlstrom, Howard and Diana (Letter # 73)**

**73-1:** Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding impacts on scenic views, refer to Section 4.1, Aesthetics. Your support for VIG Alternative M and ASP Alternative DD has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Casal, Lori (Letter # 222)**

**222-1:** See response to comment 132-1.

**Castanon, Damien (Letter # 74)**

**74-1:** See response to comment 73-1.

**Castleman, Patt (Letter # 223)**

**223-1:** See response to comment 120-2 and 132-1.

**Castro, Oscar (Letter # 224)**

**224-1:** See response to comment 120-2, 128-1, 133-1 and 134-1.

**Cervantes, Carlos (Letter # 59)**

**59-1:** The commenter’s general opposition to the proposed project has been noted. Regarding impacts on public views in the project area, refer to Section 4.1, Aesthetics. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter’s general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Chandler, Aaron (Letter # 225)**

**225-1:** See response to comment 120-2 and 132-1.

**Chandler, Tara (Letter # 226)**

**226-1:** See response to comment 120-2.

**Cheroke, Caryn (Letter # 227)**

**227-1:** See response to comment 133-1 and 134-1.

**Cobbaert, Marcie (Letter # 120)**

**120-1:** Comment noted.

**120-2:** Regarding impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics. Regarding undergrounding alternatives refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding negative impacts on economic growth, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter’s general support for undergrounding has been documented and will be taken into account by decision makers. Regarding the locations of future hearings related to the project, the CPUC acknowledges the commenter’s request that future hearings be located within or near the project area. Such requests will be considered by the CPUC when scheduling future hearings. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Cobbaert, Pierre (Letter # 369)**

**369-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Cole, Nancy (Letter # 139)**

**139-1:** See response to comment 114-1.

**Cole, Nancy and Carl (Letter # 23)**

**23-1:** The commenter's support of VIG M has been noted. Regarding traffic impacts, see Section 4.15, Transportation and Traffic. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Cook, Regina (Letter # 140)**

**140-1:** See response to comment 114-1.

**Cooley, Linda (Letter # 366)**

**366-1:** See response to comment 128-1.

**Coon, Bobbi & Dana (Letter # 228)**

**228-1:** Regarding impacts on scenic views, refer to Section 4.1, Aesthetics. See response to comment 133-1 and 134-1.

**Corral, Jeanie (Letter # 70)**

**70-1:** The commenter's opposition to the project has been noted and will be taken into account by decision makers. The CPUC notes the commenter's statements about communication with SCE; however, considering that there is no record related to the specifics of that discussion, the CPUC cannot provide further response on that topic. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**70-2:** Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. With specific regard to risks associated with earthquakes, the applicant has agreed in Project Commitment F on page 4.8-34 of the DEIR to “design the proposed substation consistent with the applicable federal, state, and local codes, including the institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations. The applicant is required to follow all laws and regulations.

**70-3:** Regarding traffic impacts, refer to Section 4.15, Transportation and Traffic. Regarding impacts specifically related to traffic loads at intersections, and the methodology used to determine the significance of the impacts, refer to Section 4.15.1.3. The complete Valley-Ivyglen Subtransmission Line Project and Alberhill System Project Traffic Impact Analysis is included in the EIR as Appendix J.

**70-4:** The commenter does not raise an issue under CEQA; therefore, no further discussion is necessary.

- 70-5:** Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. With specific regard to risks associated with earthquakes, the applicant has agreed in project commitment F on page 4.8-34 of the DEIR to “design the proposed substation consistent with the applicable federal, state, and local codes, including the institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations. Regarding impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics.
- 70-6:** Refer to Section 4.1, Aesthetics, for description of the methodology used to assess aesthetic impacts.
- 70-7:** Considering the shortest distance to a project component, Earl Warren Elementary School is approximately 0.51 miles from the project (VIG 3); Temescal Canyon High School is approximately 0.44 miles from the project (VIG 4); and Elsinore High School is 0.18 miles from the project (ASP 5).
- As shown in Table 4.11-15, distance factors greatly into the impacts of noise on sensitive receptors. For those that are located within 170 feet or less, the threshold used for this analysis generally is exceeded. For those that are further from a project component, it is not.
- While impacts may occur, noise generated from construction equipment and vehicle and helicopter use would result in short-term and temporary contributions to the ambient noise levels in the project vicinity during the overall construction period. In this manner, they would not be anticipated to cause impacts to the school operation of physical education and other outdoor events. In the short-term, some noise impacts may occur to those schools located proximate to a construction location.
- 70-8:** Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding impacts related to flooding, refer to Section 4.9, Hydrology and Water Quality.
- 70-9:** Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. In particular, Section 4.6, Geology and Mineral Resources, discusses impacts related to liquefaction.
- 70-10:** Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. A discussion of health and safety impacts related to fire may be found in Section 4.8.1.5, 4.8.2, 4.8.3, and 4.8.5 of the Environmental Impact Report.
- 70-11:** The commenter's opposition to the project has been noted and will be taken into by decision-makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.
- 70-12:** Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities.

An analysis of public safety's relationship to local governments is not within the purview of CEQA. Therefore, no further discussion is necessary.

**70-13:** Site visits were conducted at several locations. Refer to Section 4.1, Aesthetics, for a description of the methodology used to analyze aesthetics impacts, as well as visual simulations depicting views of the project upon completion. The commenter does not raise an issue under CEQA. Therefore, no further discussion is necessary.

**70-14:** The commenter's general support for undergrounding has been noted and will be taken into consideration by the decision makers.

**70-15:** The comment has been included in the public record and will be taken into consideration by the decision makers.

**Cortez, Lupe (Letter # 229)**

**229-1:** See response to comment 120-2, 133-1 and 134-1.

**Cosmos, Tiger (Letter # 24)**

**24-1:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding undergrounding alternatives refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. Regarding traffic impacts, refer to Section 4.15, Transportation and Traffic. The commenter's support for VIG M and opposition to ASP DD has been noted and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Coward, Courtney (Letter # 141)**

**141-1:** See response to comment 128-1.

**Cutuli, Peter (Letter # 80)**

**80-1:** See response to comment 73-1.

**Cutuli, Tina (Letter # 81)**

**81-1:** See response to comment 73-1.

**D – F**

**Dahl, Laurie (Letter # 230)**

**230-1:** See response to comment 128-1, 132-1, 133-1, and 134-1.

**Dang, Loc & Huong (Letter # 231)**

**231-1:** See response to comment 114-1.

**Daniello, Peter and Janice (Letter # 385)**

**385-1:** The commenter's support for undergrounding and recommendation to reconsider alternatives undergrounding along DePalma Road has been noted and will be taken into consideration by the decision makers.

**385-2:** With respect to the potential economic implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines § 15131. Regarding impacts on aesthetics and physical blight refer to Section 4.1, Aesthetics. Regarding health and Safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and mineral Resources, and Section 4.13, Public Services and Utilities. With specific regard to the implications of EMFs, the CPUC's position regarding EMFs is included in Section 2.5.4, Electric and Magnetic Fields.

**385-3:** The commenter's general support for undergrounding has again been noted and will be taken into consideration by the decision makers.

**Davies, Michael (Letter # 233)**

**233-1:** See response to comment 114-1.

**Davis, Dave (Letter # 116)**

**116-1:** See response to comment 114-1.

**Davis, Margaret (Letter # 117)**

**117-1:** See response to comment 114-1.

**Davis, Maria (Letter # 17)**

**17-1:** The commenter's general opposition to high-voltage transmission lines has been noted. Regarding negative impacts on property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts; however, refer to Section 4.1, Aesthetics, for analysis of representative viewpoints in the project area. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Davis, Tracy (Letter # 96)**

**96-1:** Comment noted. Regarding future load projections, see Chapter 1.0, Introduction. See also, Appendix D and Appendix K. The commenter's opposition to both the proposed Alberhill project site and the Alternative DD site have also been documented and will be taken into account by decision makers. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding impacts on habitat, refer to Section 4.4, Biological Resources. Regarding impacts related to flooding, refer to Section 4.9, Hydrology and Water Quality. Regarding traffic impacts, refer to Section 4.15, Transportation and Traffic. Regarding negative impacts on potential future development on the Serrano Commerce Center site, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Dean, Richard (Letter # 142)**

**142-1:** The CPUC acknowledges receipt of the commenter's submittal.

**142-2:** Your comment has been included in the public record and will be taken into consideration by the decision makers. Regarding specific concerns related to safety, traffic congestion, aesthetics and environmental impacts, see responses to 142-3 through 142-7.

**142-3:** Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities.

Regarding health and safety impacts related to fire, much of Riverside County is designated as a potential wildfire area and both projects are located in areas subject to potentially large, destructive fires. A map of fire hazard severity zones may be found on page 4.8-7 in the Draft Environmental Impact Report. An analysis of the significant environmental impacts associated with fires, discussed on pages 4.8-30 et seq. and was determined to be less than significant with mitigation through implementation of MM HZ-4 and MM HZ-8 for both the Valley Ivyglen and Alberhill projects, respectively. MM HZ-4 addresses the potentially significant fire risks associated with the Valley Ivyglen project. Under MM HZ-4, the applicant and its contractors shall develop and implement site-specific fire control and emergency response plans to address these risks. Likewise, MM HZ-4 requires coordination with local fire departments within the appropriate jurisdiction in order to facilitate expedient and proper responses to emergencies. MM HZ-8 addresses the potentially significant fire risks associated with the Alberhill project. Under MM HZ-8, the applicant would clear vegetation from the proposed site, staging areas, along access roads, and power line routes. Landscaping and irrigation would be installed after construction. Additionally, the applicant would install early-detection smoke and fire systems and fire suppression equipment would be installed on site. Finally, amongst other requirements, the applicant would be required to maintain vegetation clearances.

**142-4:** For a broad discussion of impacts related to traffic and transportation, see Section 4.14, Transportation and Traffic. The specific environmental impacts related to transportation and traffic, as well as project commitments and mitigation measures, are discussed in Section 4.15.4, Environmental Impacts and Mitigation Measures, et. seq. Regarding the commenter's roadway proposals, such proposals are outside the scope of the review of the project.

- 142-5:** Regarding impacts on aesthetics, refer to Section 4.1, Aesthetics. In addition, see Section 4.3, Air Quality, for a discussion of air quality impacts. Although impacts related to fugitive dust would be significant and unavoidable, the impact would be temporary during construction. For a discussion of biological impacts, see Section 4.4, Biological Resources. Impacts on biological resources would be reduced to less than significant with mitigation.
- 142-6:** The commenter's support for Alternative M and opposition to the Alberhill substation has been included in the public record and will be taken into consideration by the decision makers.
- 142-7:** The commenter's tentative support for Alternative DD has been included in the public record and will be taken into consideration by the decision makers. Note that due to cumulative impacts with the Nevada Hydro project, Alternative DD is no longer considered the Environmentally Superior Alternative.
- 142-8:** The commenter's comments have been received and will be included in the public record.

**Debbaneh, Yana (Letter # 26)**

- 26-1:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding undergrounding alternatives refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. Regarding traffic impacts, refer to Section 4.15, Transportation and Traffic. The commenter's support for VIG Alternative M and opposition to ASP Alternative DD has been noted and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**DeKeyser, Jim (Letter # 2)**

- 2-1:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding undergrounding alternatives refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D.

**Deleo, Craig (Letters # 235-1 and # 236-1)**

**235-1:** See response to comment 114-1.

**236-1:** See response to comment 114-1.

**De Leon, Allan (Letter # 289)**

**289-1:** See response to comment 114-1

**De Leon, Olivia (Letter # 234)**

**234-1:** See response to comment 114-1.

**Dodd, Gregory (Letter # 237)**

**237-1:** See response to comment 120-2.

**Dodd, Heidi (Letter # 143)**

**143-1:** Regarding undergrounding alternatives refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. Regarding impacts on public views, refer to Section 4.1, Aesthetics. Regarding schools, refer to Section 4.8, Hazards and Hazardous Materials, and Section 4.13, Public Services and Utilities. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Donahoe, Carole (Letter # 239)**

**239-1:** Comment noted.

**Donis, Louie (Letter # 240)**

**240-1:** Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics.

The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Du, Kevin (Letter # 11 and #82)**

**11-1:** Regarding impacts related to views, refer to Section 4.1, Aesthetics. Regarding negative impacts on property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**82-1:** Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. For additional impact analysis related to traffic egress, refer to Section, 4.15, Transportation and Traffic. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding impacts on scenic views, refer to Section 4.1, Aesthetics. Your support for VIG Alternative M and ASP Alternative DD has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Du, Meredith (Letter # 83)**

**83-1:** See response to comment 82-1.

**Duarte, Giannina & Nicole (Letter # 387)**

**387-1:** The commenter's support for VIG M and general support for undergrounding has been noted and will be taken into account by decision makers. The commenter's opposition to both the proposed project location as well as the Serrano location have been documented and will be taken into account by decision makers.

**Duarte, Jose (Letter # 241)**

**241-1:** See response to comment 114-1.

**Duckworth, Robby (Letter # 246)**

**246-1:** See response to comment 120-2.

**Edmondson, Chance (Letter # 144)**

**144-1:** The commenter's opposition to the proposed project has been noted.

**Ehrlich, Chase (Letter # 247)**

**247-1:** Comment noted.

**Ekrauss (Letter # 388)**

**388-1:** The commenter's general support for undergrounding is noted and will be considered by the decision makers. With respect to the potential economic implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines § 15131. Regarding impacts on aesthetics and physical blight refer to Section 4.1, Aesthetics. Regarding health and Safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and mineral Resources, and Section 4.13, Public Services and Utilities.

**English, Dennis (Letter # 364)**

**364-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Etienne, Maron (Letter # 249)**

**249-1:** See response to comment 114-1.

**Evans, Kaylynn (Letter # 76)**

**76-1:** See response to comment 73-1.

**Fenech, Anthony (Letter # 77)**

**77-1:** See response to comment 73-1.

**Ferguson, Jack (Letter # 45)**

**45-1:** Your opposition to the proposed project has been noted. Regarding blight and property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Mitigation is required for all impacts that were determined to be significant in the DEIR. For the Valley-Ivyglen and Alberhill projects mitigation is required for Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology, Soil, and Mineral Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise and Vibration, Public Services and Utilities, and Transportation. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Fesperman, Erica (Letter # 250)**

**250-1:** See response to comment 120-2, 128-1, 133-1, and 134-1.

**Fleming, Tim (Letter # 121)**

**121-1:** Regarding impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Flores, Miguel (Letter # 379)**

**379-1:** See response to comment 128-1.

**Fornaro, Jennifer (Letter # 251)**

**251-1:** The commenter's support for VIG M and general support for undergrounding has been noted and will be taken into account by decision makers. Regarding impacts on aesthetics refer to Section 4.1, Aesthetics. Mitigation measures designed to reduce aesthetic impacts are discussed in detail in Sections 4.1.

**Frank, Richard and Ann (Letter # 42)**

**42-1:** Regarding impacts related to public views in the project area, refer to Section 4.1, Aesthetics. Your support for VIG Alternative M has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Fuller, Heather (Letter # 58)**

**58-1:** Regarding impacts related to aesthetics and scenic views, refer to Section 4.1, Aesthetics. Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding economic activity, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**G-I**

**Garcia, Freedom (Letter # 252)**

**252-1:** See response to comment 114-1.

**Garcia, Yvonne (Letter # 370)**

**370-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Garrett, Franchiska (Letter # 146)**

**146-1:** The commenter's opposition to the proposed project has been noted. See response to comment 120-2.

**Geddes, Kathleen and Robert (Letter # 253)**

**253-1:** See response to comment 114-1.

**Geddes, Robert (Letter # 254)**

**254-1:** See response to comment 114-1.

**Giandalia, Pamela (Letter # 20)**

**20-1:** The commenter's general opposition to high-voltage transmission lines has been noted. Regarding negative impacts on property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts; however, refer to Section 4.1, Aesthetics, for analysis of representative viewpoints in the project area. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Gibilterra, Nancy (Letter # 65)**

**65-1:** Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding impacts on public views, refer to Section 4.1, Aesthetics. Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Gillespie, Gina (Letter # 255)**

**255-1:** See response to comment 128-1 and 132-1.

**Glass, Jonathan and Mandi (Letter # 85)**

**85-1:** See response to comment 73-1.

**Gonzales, Christina (Letter # 374)**

**374-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Gonzalez-Peralta, Christina (Letter # 256)**

**256-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Goodall, Josh (Letter # 257)**

**257-1:** See response to comment 128-1, 133-1, and 134-1.

**Grace, Kim (Letter # 258)**

**258-1:** See response to comment 120-2, 121-1, 128-1, and 133-1.

**Grace, Roger (Letter # 389)**

**389-1:** Regarding impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics. Regarding negative impacts on economic growth, per CEQA Guidelines Section 15131, CEQA does not require an analysis of economic impacts.

**Graham, Threese (Letter # 147)**

**147-1:** See response to comment 133-1.

**Gray, Amber (Letter # 148)**

**148-1:** See response to comment 120-2.

**Gray, John (Letter # 260)**

**260-1:** See response to comment 120-2, 121-1, 128-1, 132-1, 133-1, and 134-1. With specific regard to the implications of EMFs, the CPUC's position regarding EMFs is included in Section 2.5.4, Electric and Magnetic Fields.

**Gray, Sandra (Letter # 149)**

**149-1:** See response to comment 120-2..

**Greany, Patrick (Letter # 259)**

**259-1:** See response to comment 120-2, 121-1, 128-1, and 132-1.

**Grebe, Kay (Letter # 87)**

**87-1:** See response to comment 73-1.

**Gregory, Dodd (Letter # 238)**

**238-1:** See response to comment 120-2 and 132-1.

**Griffith, Thomas (Letter # 261)**

**261-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Guerrero, Enrique (Letter # 262)**

**262-1:** See response to comment 114-1.

**Gula, Robert (Letter # 150)**

**150-1:** See response to comment 120-2.

**Gula, Vanda (Letter # 151)**

**151-1:** See response to comment 120-2.

**Gulledge, Karl (Letter # 263)**

**263-1:** See response to comment 114-1 and 248-13.

**Haag, Steven (Letter # 69)**

**69-1:** Your support for VIG Alternative M has been documented and will be taken into account by decision makers. Upon completion of the environmental review, the CPUC will make a decision regarding whether or not to approve or reject the project or whether to approve an alternative to the project. The decision will be based on a variety of factors, including the environmental impacts of the project and its alternatives.

**Haddad, Samir (Letter # 264)**

**264-1:** See response to comment 114-1.

**Haley, Angela (Letter # 152)**

**152-1:** See response to comment 133-1.

**Hall, Jessica (Letter # 265)**

**265-1:** See response to comment 132-1, 133-1, and 134-1.

**Hansen, Janet (Letter # 39)**

**39-1:** Regarding impacts on public views in the project area, refer to Section 4.1, Aesthetics. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter's general support of undergrounding alternatives has been noted; however, the commenter has not raised specific claims regarding the adequacy of the EIR. Therefore, no further response is required.

**Harding, Juanita (Letter # 41)**

**41-1:** Your opposition to overhead transmission lines and support of VIG Alternative M has been noted.

**Harris, Donna (Letter # 153)**

**153-1:** See response to comment 133-1. Regarding alternative paths, refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. Regarding allegations that the EIR is flawed, the commenter has not provided specific examples of flawed analyses from the DEIR. Therefore, the commenter's opinion that the DEIR is flawed has been noted, but no further response is required.

**Hart, Dennis (Letter # 154)**

**154-1:** See response to comment 114-1.

**Hasler, Rosa (Letter # 266)**

**266-1:** See response to comment 132-1.

**Hatcher, Jessica (Letter # 267)**

**267-1:** See response to comment 114-1.

**Hazinski, Heather (Letter # 383)**

**383-1:** The commenter's general support for undergrounding and support for VIG Alternative M, has been included in the public record and will be considered by the decision makers. Moreover, the commenter's opposition to the proposed project as well as the Serrano Commerce Center alternative, has been noted and will be considered by the decision makers. Regarding impacts related to aesthetics and scenic views refer to Section 4.1, Aesthetics. Regarding property values and economic activity, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding health and Safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and mineral Resources, and Section 4.13, Public Services and Utilities.

**Heaston, Jeanelle (Letter # 155)**

**155-1:** See response to comment 114-1.

**Heinze, Julie (Letter # 84)**

**84-1:** See response to comment 73-1.

**Hinojosa, Maria (Letter # 268)**

**268-1:** See response to comment 120-2, 121-1, and 132-1.

**Hirsch, Christina (Letter # 269)**

**269-1:** See response to comment 133-1 and 134-1.

**Hiss, Arlene (Letter # 157)**

**157-1:** See response to comment 132-1 and 133-1.

**Hoag, Matthew (Letter # 270)**

**270-1:** See response to comment 114-1.

**Hoag, Tracy (Letter # 271)**

**271-1:** See response to comment 114-1.

**Holm, Marlene (Letter # 158)**

**158-1:** See response to comment 114-1.

**Howell, Melissa (Letter # 272)**

**272-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Hubbard, Sally (Letter # 159)**

**159-1:** See response to comment 114-1.

**Hunzeker, Nancy (Letter # 160)**

**160-1:** See response to comment 132-1.

**Hurtado, Jeannette (Letter # 273)**

**273-1:** See response to comment 120-2 and 121-1.

**Hurtado, Oscar (Letter # 274)**

**274-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Hyun, Joh Joo (Letter # 275)**

**275-1:** See response to comment 114-1.

**Inderbitzen, Erik (Letter # 276)**

**276-1:** See response to comment 114-1.

**Isom, Sandra (Letter # 122)**

**122-1:** See response to comment 114-1.

**J – L**

**Jackson, Marilyn (Letter # 242)**

**242-1:** See response to comment 120-2, 128-1, 133-1, and 134-1.

**Jacobo, Denise & Abelardo (Letter # 277)**

**277-1:** See response to comment 132-1, 133-1, and 134-1..

**Jannuzzi, Laura (Letter # 93)**

**93-1:** See response to comment 73-1.

**Jiron, Ann (Letter # 278)**

**278-1:** See response to comment 114-1.

**Johnson, Lisa (Letter # 35)**

**35-1:** The CPUC acknowledges receipt of the commenter's letter. A complete environmental analysis is provided in the EIR.

**35-2:** Your support for undergrounding transmission lines has been noted. See Section 4.2, Aesthetics, for an analysis of aesthetic impacts.

**Johnson, Melanie (Letter # 3)**

**3-1:** Regarding impacts related to views, refer to Section 4.1, Aesthetics. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding undergrounding alternatives refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. Regarding negative impacts on property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Jordan, Shelly (Letter # 280)**

**280-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Kalyani, Dhairya (Letter # 282)**

**282-1:** See response to comment 114-1.

**Keith, Charles (Letter # 283)**

**283-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Keith, Cindy (Letter # 285)**

**285-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Kelley, Paul (Letter # 284)**

**284-1:** Comment noted.

**Keo, Pany (Letter # 371)**

**371-1:** See response to comment 114-1.

**Kilgore, Dana (Letter # 286)**

**286-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Kinne, Amie (Letter # 100)**

**100-1:** Comment noted.

**Kleist, Joe (Letter # 124)**

**124-1:** See response to comment 114-1.

**Kleist, Joe and Kim (Letter # 101)**

**101-1:** Comment noted.

**Kleist, Kim (Letter # 123)**

**123-1:** See response to comment 114-1.

**Knoepfel, Janet (Letter # 21)**

**21-1:** The commenter's general opposition to high-voltage transmission lines and opposition to the Alberhill Substation has been noted. The commenter's support for VIG M has been documented and will be taken into account by decision makers. Regarding traffic impacts, see Section 4.15, Transportation and Traffic. Regarding aesthetic impacts, see Section 4.1, Aesthetics. The

commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Kolodge, Lisa (Letter # 161)**

**161-1:** See response to comment 120-2.

**LaLonde, Tim (Letters # 64 and # 378)**

**64-1:** Your support for VIG M and your opposition for the proposed Alberhill project site and the Alternative DD site have been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**378-1:** See response to comment 114-1.

**Lange, Martin and Sabine (Letter # 49)**

**49-1:** Your opposition to ASP Alternative DD has been noted. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. See Section 4.1, Aesthetics, for an analysis of impacts on representative public views in the project area. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Lange, Sabine (Letter # 162)**

**162-1:** See response to comment 120-2.

**LaRosa, Dana (Letter # 163)**

**163-1:** See response to comment 132-1 and 133-1.

**Larsen, John (Letter # 288)**

**288-1:** See response to comment 133-1, and 134-1.

**LePenske, Michaele (Letter # 164)**

**164-1:** See response to comment 132-1 and 133-1. Regarding negative impacts on economic growth, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. .

**Lesovsky, Wendy (Letter # 290)**

**290-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Lester, Clarence (Letter # 291)**

**291-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Lewis, Richard and Sue (Letter # 125)**

**125-1:** See response to comment 114-1.

**Lewis-Snyder, James (Letter # 365)**

**365-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Lopez, Jackie (Letter # 165)**

**165-1:** Your support for VIG Alternative M (undergrounding) and opposition to the Proposed Project and ASP Alternative DD (Serrano Commerce Center) has been noted.

**Lucas, James (Letter # 166)**

**166-1:** See response to comment 114-1.

**Luepnitz, Patrick and Doreen (Letter # 106)**

**106-1:** See response to comment 73-1.

**Luna, Dionne & Jorge (Letter # 292)**

**292-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.er 3.0,

**M – O**

**MacLean, Greg (Letter # 60)**

**60-1:** The environmental review for the proposed project was noticed in compliance with CEQA Section 15082.

**60-2:** Comment noted.

**60-3:** The project objectives are outlined in Chapter 1 of the EIR. Regarding impacts related to fire, refer to Section 4.8, Hazards and Hazardous Materials, and Section 4.13, Public Services and Utilities. Regarding impacts related to aesthetics and scenic views, refer to Section 4.1, Aesthetics. For information about ratemaking, visit the Office of Ratepayer Advocates webpage at: <http://www.ora.ca.gov/>.

- 60-4:** Regarding alternatives to the proposed project, refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D.
- 60-5:** Your opposition to the project has been noted and will be taken into account by decision makers.
- 60-6:** Regarding traffic impacts, refer to Section 4.15, Transportation and Traffic. The remainder of the comment does not raise specific claims regarding the adequacy of the EIR; therefore, no further response is required.
- 60-7:** The project objectives are outlined in Chapter 1 of the EIR. Regarding alternatives to the proposed project, including the preliminary selection process and analysis, refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D and Appendix K.

**Maddock, Stephanie (Letter # 167)**

- 167-1:** See response to comment 120-2.

**Makshanoff, Heather (Letter # 168)**

- 168-1:** See response to comment 120-2.

**Maness, John (Letter # 293)**

- 293-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Manos, Veronica (Letter # 294)**

- 294-1:** Regarding impacts on aesthetics, refer to Section 41., Aesthetics. Mitigation measures designed to ameliorate aesthetic impacts are discussed in detail in Section 41, pages 16-62. With respect to potential economic implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines §15131. Rather, CEQA focuses on the potential environmental impacts of a proposed projects. The basic purposes of CEQA are to (1) inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and (4) disclose the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.
- 294-2:** The commenter's general objection to aboveground power lines has been noted and will be taken into consideration by decision makers.
- 294-3:** A number of alternatives to the project, including alternative pathways, were analyzed in Section 5.0, Comparison of Alternatives. The alternatives to the Valley-Ivyglen project retained

for consideration in this EIR include: (1) VIG Alternative A – Campbell Ranch Road (115-kV Segment VIG8); (2) VIG Alternative B1 – Underground along Santiago Canyon Road (115-kV Segment VIG8); (3) VIG Alternative B2 – Santiago Canyon Road Underground and Overhead; (4) VIG Alternative C – Underground along Temescal Canyon Road and Horsetheif Canyon Road (115-kV Segment VIG6); (5) VIG Alternative M – Underground along the Entire Proposed Project Alignment; and (6) VIG No Project Alternative. The alternatives to the Alberhill Project retained for consideration in this EIR are: (1) ASP Alternative B – All Gas-Insulated Switchgear at Proposed Alberhill Substation Site; (2) ASP Alternative DD – Serrano Commerce Center Substation Site; and (3) ASP No Project Alternative. A full discussion of each of these alternatives is discussed in detail in Section 5.0, Comparison of Alternatives.

- 294-4:** Impacts related to Highway 74 are discussed in Section 4.1, Aesthetics. Specifically, in Sections 4.1.2.3, Regional and Local and 4.1.4.2, Impacts Analysis (Valley-Ivyglen Project).
- 294-5:** Impacts related to biologic resources, including endangered species, is analyzed in Section 4.4, Biological Resources.
- 294-6:** The methodology for analyzing traffic impacts is outlined in Section 4.15, Transportation and Traffic. The analysis focuses on the effects of the proposed projects. Therefore, only intersections that have potential to be impacted are included in the analysis. Note that work along the subtransmission line routes would be temporary and dispersed. Work at the substation would be located on the east side of I-15 in a location containing few residences. Therefore, an analysis of traffic impacts on all city streets in the project area is unwarranted and is beyond the scope of this environmental review.
- 294-7:** With respect to the potential economic implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines § 15131.
- 294-8:** Regarding allegations that the EIR is flawed, the commenter has not provided specific examples of flawed analyses from the DEIR. Therefore, the commenter’s opinion that the DEIR is flawed has been noted, but no further response is required.
- 294-9:** The commenter’s general support for Alternative M has been noted and will be taken into consideration by the decision makers.

**Marete-Charlot, Elizabeth (Letter # 393)**

- 393-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Marquez, Sandra (Letter # 169)**

- 169-1:** See response to comment 133-1.

**Martinez, Steve (Letter # 89)**

- 89-1:** See response to comment 73-1.

**Matiran, Cindy (Letter # 15)**

**15-1:** Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding impacts on scenic views, refer to Section 4.1, Aesthetics. Your support for VIG M and ASP DD has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Mayer, Lyn (Letter # 1)**

**1-1:** A discussion of the environmental effects of the project are discussed in detail in Section 4.0 through Section 4.15. Regarding health and safety impacts, refer specifically to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. See Section 4.1, Aesthetics for a discussion of aesthetic impacts. Your opposition to the project has been noted.

**Mayes, Kenneth (Letter # 296)**

**296-1:** See response to comment 120-2, 121-1, and 128-1.

**McClure, Donna (Letter # 126)**

**126-1:** See response to comment 114-1.

**McDonald, Janet (Letter # 92)**

**92-1:** See response to comment 73-1.

**McDonald, Todd (Letter # 105)**

**105-1:** See response to comment 73-1.

**McKasson, Don (Letter # 18)**

**18-1:** The commenter's general opposition to high-voltage transmission lines has been noted. Regarding aesthetic impacts, refer to Section 4.1, Aesthetics, for analysis of representative viewpoints in the project area. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**McLain, Mary (Letter # 43)**

**43-1:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and

Mineral Resources, and Section 4.13, Public Services and Utilities. Your opposition to the project has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Mihlbauer, Juli (Letter # 170)**

**170-1:** See response to comment 120-2.

**Miller, Kevin (Letter # 297)**

**297-1:** See response to comment 114-1.

**Mirabella, Frances (Letter # 171)**

**171-1:** See response to comment 133-1.

**Miranda, Brandie (Letter # 298)**

**298-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Mitchell, Stacey (Letter # 172)**

**172-1:** See response to comment 114-1. The commenter raises various concerns about existing mining operations in the vicinity; however, the CPUC notes that these concerns are part of the existing baseline conditions and are unrelated to the proposed project. Regarding impacts on wildlife, refer to Section 4.4, Biological Resources. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Moore, Carly (Letter # 30)**

**30-1:** Your support of VIG Alternative M and opposition to ASP Alternative DD has been noted. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Moore, Carly (Letter # 382)**

**382-1:** See response to comment 114-1.

**Moore, Jo Ann (Letter # 300)**

**300-1:** See response to comment 114-1.

**Moore, Roseann (Letter # 173)**

**173-1:** See response to comment 114-1.

**Morairty, Terry (Letter # 127)**

**127-1:** See response to comment 120-2.

**Moya, Rebecca (Letter # 174)**

**174-1:** See response to comment 114-1.

**Mucha, Rob (Letter # 301)**

**301-1:** See response to comment 114-1.

**Mutka, Jason (Letter # 302)**

**302-1:** See response to comment 114-1.

**Nay, Eric (Letter # 27)**

**27-1:** Your support of VIG Alternative M and opposition to ASP Alternative DD has been noted. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Neer, Stacia (Letter # 303)**

**303-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Noble, Kimberly (Letter # 175)**

**175-1:** See response to comment 128-1.

**Norman, Joseph (Letter # 281)**

**281-1:** See response to comment 114-1.

**Norton, Anthony (Letter # 304)**

**304-1:** See response to comment 114-1.

**Noss, Kelli (Letter # 12)**

- 12-1:** Your opposition to overground transmission lines has been noted.
- 12-2:** Much of Riverside County is designated as a potential wildfire area and both projects are located in areas subject to potentially large, destructive fires. A map of fire hazard severity zones may be found on page 4.8-7 in the Draft Environmental Impact Report. An analysis of the significant environmental impacts associated with fires, discussed on pages 4.8-30 et seq. and was determined to be less than significant with mitigation through implementation of MM HZ-4 and MM HZ-8 for both the Valley Ivyglen and Alberhill projects, respectively. MM HZ-4 addresses the potentially significant fire risks associated with the Valley Ivyglen project. Under MM HZ-4, the applicant and its contractors shall develop and implement site-specific fire control and emergency response plans to address these risks. Likewise, MM HZ-4 requires coordination with local fire departments within the appropriate jurisdiction in order to facilitate expedient and proper responses to emergencies. MM HZ-8 addresses the potentially significant fire risks associated with the Alberhill project. Under MM HZ-8, the applicant would clear vegetation from the proposed site, staging areas, along access roads, and power line routes. Landscaping and irrigation would be installed after construction. Additionally, the applicant would install early-detection smoke and fire systems and fire suppression equipment would be installed on site. Finally, amongst other requirements, the applicant would be required to maintain vegetation clearances.
- 12-3:** Visual resources have been evaluated as shown in Section 4.1 of the DEIR. As part of this analysis, 15 key viewpoints were selected for which simulations were created to show the project components. These individual views then were evaluated with respect to the manner in which changes occurred to the overall vividness, intactness, and unity of the view. Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project. The basic purpose of CEQA is to identify potential significant environmental effects of proposed activities, avoid or reduce potential significant environmental effects, and disclose potential significant environmental effects of approved activities (CEQA Guidelines Section 15002). As described in CEQA Guidelines Sections 15131 and 15382, “economic or social effects of a project shall not be treated as significant effects on the environment.” Economic or social effects are assessed under CEQA only if those changes result in physical effects to the environment. There is no evidence that the proposed project would affect property values which would result in an environmental effect. Therefore, in accordance with CEQA Guidelines, potential effects on property values as a result of the proposed project were not analyzed in this EIR.

**Null, Justin (Letter # 305)**

- 305-1:** See response to comment 120-2, 121-1, and 128-1.

**O'Doherty, John (Letter # 13)**

- 13-1:** The commenter's figure orientation preferences have been noted, but as this comment does not relate to errors or omissions in the EIR, no changes have been made.

- 13-2:** Project routing is based on a variety of constraints, and the shortest route is not always necessarily feasible. CEQA requires that a reasonable range of alternatives be analyzed for the proposed project and does not require that every conceivable alternative be considered. See Chapter 2.0, Description of Project Alternatives, and Appendix D for a discussion of the alternatives selection process for these projects.
- 13-3:** Chapter 2.0, Description of the Proposed Projects, contains details related to the types of poles to be used for the proposed project.
- 13-4:** The comment relates to existing infrastructure and not to the proposed project or the EIR. The commenter has not raised a specific issue regarding the EIR. Therefore, no response is required.
- 13-5:** The commenter has not raised any specific concerns associated with the EIR. Therefore, no response is required.
- 13-6:** The methodology for assessing visual impacts is outlined in Section 4.1, Aesthetics.
- 13-7:** See Section 2.5.4 for a discussion of Electro and Magnetic Fields.
- 13-8:** The CPUC has preemptive jurisdiction over local ordinances. Alternatives related to undergrounding are included in Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives. See also, Appendix D.
- 13-9:** CEQA requires that a reasonable range of alternatives be analyzed but does not require that every conceivable alternative be addressed. CEQA also requires that alternatives reduce a significant impact of the proposed project. See Section 2.0, Description of Alternatives, and Section 5.0, Comparison of Alternatives for more information regarding the selection of alternatives.
- 13-10:** CEQA does not require that every view be documented. Representative views of the project area are included in Section 4.1, Aesthetics.

**Olson, Ruth (Letter # 177)**

- 177-1:** The commenter's general support for undergrounding has been documented and will be taken into account by decision makers.

**Osborne, Gena (Letter # 36)**

- 36-1:** The commenter's preference for VIG M and opposition to ASP DD has been noted. Regarding impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics. Regarding fire hazards, refer to Section 4.8, Hazards and Hazardous Materials, and Section 4.13, Public Services and Utilities. Regarding biological impacts, refer to Section 4.4, Biological Resources.

**Osborne, John (Letter # 306)**

**306-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**P – S**

**Parks, Denise (Letter # 307)**

**307-1:** See response to comment 114-1.

**Parrish, Donna (Letter # 308)**

**308-1:** See response to comment 114-1.

**Paul, Barbara and Robert (Letter # 71)**

**71-1:** The Commenter's concern regarding the proposed project along DePalma Road between Indian Truck Trail and Horsethief Canyon Road has been noted.

**71-2:** Impacts related to aesthetics are discussed in detail in Section 4.1, Aesthetics. With respect to the potential economic implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines § 15131.

**71-3:** See response to comment 71-2.

**71-4:** See response to comment 71-2.

**71-5:** The commenter's support for undergrounding from Horsethief Canyon Road along DePalma Road has been noted.

**71-6:** The commenter's suggestion to relocated proposed guard structures will be taken into consideration by the decision makers. With respect to helicopter use, note that although the CPUC previously approved a project design for the Valley-Ivyglen project that did not include helicopter usage, during final engineering of the previous iteration of the project design, SCE determined that helicopters were necessary in order to construct the project. As such, SCE submitted a petition for modification. The purpose of the current EIR is to evaluate the applicant's updated project design, which is based on updated construction requirements and engineering data that were not available at the time of the initial project review. No further response is necessary because no issues related to the adequacy of the current environmental impact analysis in the Draft EIR were raised.

**71-7:** With respect to the potential economic implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines § 15131.

**71-8:** The commenter's general support for undergrounding, and concerns regarding proposed development along Glen Eden's southeast boundary, have been included in the public record and will be taken into consideration by the decision makers.

**71-9:** The commenter's support for VIG Alternative M and for undergrounding transmission lines along the Glen Eden Property has been noted.

**Paulus, Karmen (Letter # 119)**

**119-1:** Comment noted.

**Petersen, Cindy (Letter # 178)**

**178-1:** See response to comment 133-1

**Pham, Christine (Letter # 179)**

**179-1:** See response to comment 120-2.

**Pietila, Sheila (Letter # 180)**

**180-1:** See response to comment 114-1.

**Pratt, Amanda (Letter # 67)**

**67-1:** Regarding impacts related to aesthetics and scenic views, refer to Section 4.1, Aesthetics. Impacts on the Temescal Wash are discussed in Section 4.4, Biological Resources, under Impact BR-4 (ASP). The commenter's support for ASP DD has been noted and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Pratt, Chad (Letter # 181)**

**181-1:** See response to comment 128-1.

**Pratt, Kristen (Letter # 182)**

**182-1:** See response to comment 133-1.

**Prime, Debbie (Letter # 309)**

**309-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Pruden, Brenda (Letter # 102)**

**102-1:** See response to comment 73-1.

**Rainey, Michael (Letter # 183)**

**183-1:** See response to comment 114-1.

**Rainwater, Brian and Kelly (Letter # 97)**

**97-1:** See response to comment 73-1.

**Rauf, Mohammad (Letter # 310)**

**310-1:** See response to comment 114-1.

**Reade, Stephanie (Letter # 78)**

**78-1:** See response to comment 73-1.

**Ridenour, Linda Lou and Martin (Letter # 34)**

**34-1:** Hard copies of the EIR were available for review at Lake Elsinore, Canyon Lake, Wildomar, Palomar, and City of Perris Cesar Chavez Libraries.

**34-2:** The commenter has not raised a specific concern related to the adequacy of the EIR. Therefore, no further response is required.

**34-3:** The commenter's support the the No Project alternative has been noted.

**34-4:** In cases where a project has significant and unavoidable impacts (i.e., impacts that cannot be mitigated to less than significant levels), under CEQA, the agency has the option of writing a Statement of Overriding Considerations if it determines that the project is in the public interest.

**34-5:** Comment noted.

**34-6:** See response to comment 34-4. The applicant would participate in the MSHCP, which is designed to reduce impacts on biological resources. In addition, see Section 4.4, Biological Resources, for additional mitigation related to biological impacts. Cumulative impacts are disclosed in Chapter 6.0, Cumulative Impacts.

**34-7:** Emissions calculations are included in Appendix B and include a number of scenarios. Any submittals required by South Coast Air Quality Management District (SCAQMD) to obtain permits would be submitted after CPUC project approval, prior to construction. See response to comment 34-8. The commenter also notes that the project area is designated nonattainment for various contaminants. This refers to baseline conditions. As discussed under Impact 4 (both VIG and ASP), although sensitive receptors near construction sites would be exposed to toxic air contaminants (TACs), construction in any one location would be temporary, which would reduce the potential exposure to TACs. The proposed project would not result in chronic

exposure to a new source of TACs. The increased cancer risk from exposure to construction activities would therefore be far below the SCAQMD significance threshold.

- 34-8:** Rules that apply to the project are outlined in the regulatory setting in Section 4.3, Air Quality. Note that District permits are not required until after CPUC project approval, prior to construction. The CPUC's approval, if the project is approved, is conditional upon the applicant obtaining all of the necessary permits.
- 34-9:** Comment noted.
- 34-10:** The commenter has identified that the EIR discloses a significant and unavoidable air quality impact. No further response is required.
- 34-11:** Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding air impacts, refer to Section 4.3, Air Quality. The commenter identifies that air quality impacts disclosed in the EIR would be significant and unavoidable even after mitigation. Air emissions are estimated based on conservative estimates and would not exceed amounts disclosed in the EIR. These estimates would be refined based on final engineering during acquisition of project air permits and could be lower than stated in the EIR. The commenter's opinion regarding expenditures on air credits has been noted.
- 34-12:** The applicant would be required to obtain the applicable air quality permits from the local air district as a condition of project approval. The data used to support air quality permit acquisition will be based on final engineering and is not currently available. Estimates included in the EIR are based on conservative assumptions and would be refined during final engineering. Air emissions would not exceed amounts presented in the EIR.
- 34-13:** Although Table 4.3-12 discloses exceedances of applicable air quality thresholds, these estimates are prior to application of mitigation measures. As described in the impact analysis, air impacts would be reduced but would remain significant after mitigation. If the CPUC determines the project to be in the public interest, they may opt to prepare a Statement of Overriding Considerations in order to approve the project.
- 34-14:** NERC and WECC are defined in Section 1.1.2. The remainder of the comment is unclear and does not raise specific concerns regarding the adequacy of the EIR. Therefore, no further response is required.
- 34-15:** The CPUC is uncertain to which modifications the commenter refers. The public comment period for the DEIR was extended by 45 days, resulting in a 90-day public comment period (April 14, 2016, through July 15, 2016).
- 34-16:** Article XII, Section 8 of the California Constitution establishes the CPUC's preemption power over local jurisdictions with respect to regulation of investor-owned public utilities and electric utility construction and siting. Article XII, Section 8 states, "A city, county, or other public body may not regulate matters over which the Legislature grants regulatory power to the [Public Utilities] Commission."

- 34-17:** As part of the proposed projects, the applicant is becoming a PSE with the Western Riverside MSHCP. The MSHCP is one of several large, multi-jurisdictional habitat conservation planning efforts in Southern California that are designed to maintain biological diversity within rapidly urbanizing areas. The MSHCP provides conservation for 146 special status species, including federal and state listed endangered and threatened species, and provides incidental take permits for development projects that may impact these species. Species- and site-specific surveys are required to be completed as part of the MSHCP, as well as focused habitat assessments for covered wildlife species when a project is located in suitable habitat, and they must follow MSHCP protocol guidelines. Habitat compensation measures are also required, in the event that sensitive habitat (including California gnatcatcher habitat) is removed or adversely affected during construction. Thread-leafed brodiaea was not detected during surveys.
- 34-18:** The commenter requests to review undefined Caltrans reports. It is unclear to which reports the commenter refers. The traffic analysis in the EIR was conducted by SCE's consultant, Linscott Law & Greenspan. The Traffic Study can be found in Appendix I of the EIR. Your support for undergrounding transmission lines has been noted.
- 34-19:** Local jurisdictional permits are preempted by the CPUC. The final landscaping design will be completed during final engineering; however, visual simulations are presented in Section 4.1, Aesthetics.
- 34-20:** Impacts related to earthquakes are discussed in Section 4.6, Geology, Soils, and Mineral Resources. Per Project Commitment F, the applicant would prepare a Geotechnical Study, conduct soil testing, and would design the project to seismic design standards. Impacts related to earthquakes would be less than significant with mitigation.
- 34-21:** The scoping report prepared for the projects is included in Appendix A. The reasoning behind the decision to consolidate the review of the two projects into one environmental review is outlined in Section 1.0, Introduction, of the EIR.
- 34-22:** For the Valley-Ivyglen Subtransmission Line Project, botanical surveys completed in 2006, 2007, 2008, and 2009 followed the Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities (CDFG 2006) and the California Native Plant Society (CNPS) Botanical Survey Guidelines (CNPS 2001). Botanical surveys completed in 2010, 2011, 2012, 2013, and 2014 were conducted per the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFG 2009).
- For the Alberhill Systems Project, botanical surveys were conducted from 2009 through 2014 following Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Species (USFWS 2000); Protocols for Surveying and Evaluation Impacts to Special Status Native Plant Populations and Natural Communities (CDFG 2009); and CNPS Botanical Survey Guidelines (CNPS 2001).
- These guidelines and protocols followed during surveys outline what time of year these surveys should take place and the accepted methods for carrying out surveys.
- 34-23:** Vernal pools are included in the discussion of jurisdictional waters impacts (Impact BR-3), as well as in the discussion of fairy shrimp and sensitive habitats in Impact BR-1 and Impact BR-

2. The Valley-Ivyglen and Alberhill System Projects were designed to avoid vernal pools. Construction activities would not contribute to changes in topography that would impact vernal pool hydrology, and no direct impacts to vernal pools are expected to result from construction.

Per Section 6.1.2 of the MSHCP, if an avoidance alternative is not feasible and a practicable alternative is instead selected, a Determination of Biologically Equivalent of Superior Preservation Analysis shall be prepared and submitted by the Permittee to ensure replacement of any lost functions and values of habitat as it relates to Covered species. In addition to obligations as a PSE in the MSHCP, indirect impacts would be further mitigated by MM BR-1, MM BR-2, MM BR-3, and MM BR-15. These measures would limit construction to designated areas to avoid riparian aquatic and wetland areas, require preconstruction surveys of work areas, require biological monitoring during construction and require implementation of a SWPPP.

- 34-24:** Significance is determined based on the assumption that future design changes will be minor. If design changes are determined to be significant an addendum to the Final EIR may be required or the EIR may be recirculated.
- 34-25:** The commenter's statement is vague and does not refer to a specific location in the EIR. Therefore, no further response is required.
- 34-26:** The applicant would implement MM BR-7, which would require the implementation of a habitat restoration and revegetation plan, which would require consultation of and approval from the CPUC, USFWS and CDFW prior to the CPUC issuing a Notice to Proceed. MM BR-6, "Oak Tree Protection Measures", would be implemented in all project areas. Preventative measures would be taken during construction activities to minimize impacts to oak trees. If oak tree removal is necessary, the applicant would relocate the trees to a place outside the area of anticipated impacts, under the direction of a certified arborist. If oak trees cannot be relocated, they would be replaced by 1-gallon oak trees, at a ratio of 12:1, at the request of CDFW. The planted oak trees would be monitored for up to 15 years after planting to determine success. In addition, as a PSE in the MSHCP, the applicant is required to implement habitat compensation measures outlined in the MSHCP in the event that sensitive habitat is removed or adversely affected during construction. MM BR-3 would also require biological monitoring in any area where sensitive wildlife, plants, or habitat may be impacted by construction activities.
- 34-27:** Impacts on cultural resources, including historical resources, are analyzed in Section 4.5.4 and Section 4.5.5 of the EIR.
- 34-28:** The commenter's statements indicate curiosity about specific items identified in Table 4.8-1. The sites identified in Table 4.8-1 contain reference codes, and additional information can be obtained from the references included in Section 4.8.6, References. For more information about the Phase I Environmental Site Assessment (ESA), see the Rubicon Phase I ESA (Rubicon Engineering Corporation. 2009a. Phase I Environmental Site Assessment Report: 49 Proposed SCE Alberhill Substation, Lake Elsinore, CA (Project 1009.24. September 30.)
- 34-29:** The applicant owns the Alberhill project site. If the projects are approved, the applicant would secure easements for linear segments of both projects.

- 34-30:** According to Section 4.8 of the EIR implementation of MM HZ-4 would ensure that impacts related to fire hazards are reduced to less than significant. For more information on fire hazards see Section 4.8 Hazards and Hazardous Materials.
- 34-31:** Impacts related to expansive soils are discussed in Section 4.6, Geology, Soils, and Mineral Resources. Per Project Commitment F, the applicant would prepare a Geotechnical Study, conduct soil testing, and would design the project to seismic design standards. Impacts related to expansive soils would be less than significant with mitigation.
- 34-32:** The applicant would prepare a SWPPP and obtain a NPDES permit prior to construction in accordance with applicable law.
- 34-33:** The data presented by the applicant in their PEA and technical reports (as amended or clarified by Data Requests) is based on conservative assumptions and is understood to represent the worst case scenario. It is unclear to which mitigation measures the commenter refers; therefore, a more specific response cannot be provided. No further response is required.
- 34-34:** The habitat restoration and revegetation plan will be posted on the project website during the construction phase if the project is approved.
- 34-35:** The commenter alleges that the project is not needed due to an unrelated court case. See Chapter 1.0, Introduction, for description of the applicant's project need and the objectives for the proposed project. See also Appendix K.

**Rindal, Darlene (Letter # 184)**

- 184-1:** See response to comment 133.1

**Rippy, Douglas (Letter # 367)**

- 367-1:** See response to comment 114-1.

**Ristow, Justin (Letter # 14)**

- 14-1:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Traffic impacts associated with the project are discussed in Section 4.15 Traffic and Transportation; however, note that traffic impacts would be temporary. Regarding negative impacts on other potential development in the area, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding undergrounding alternatives that were considered for this project, refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. The commenter's support for Alternative DD and general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Robinson, Nancy (Letter # 311)**

**311-1:** See response to comment 114-1.

**Rogan, Avise (Letter # 312)**

**312-1:** See response to comment 114-1, 120-2, 121-1, 128-1, 133-1, and 134-1.

**Ryan, Kimberly (Letter # 185)**

**185-1:** The commenter's opposition to the proposed project has been noted.

**Ryu, Edward (Letter # 313)**

**313-1:** See response to comment 114-1.

**Salinas, Diana (Letter # 314)**

**314-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Sandlin, Grace (Letter # 315)**

**315-1:** Regarding property values and economic activity, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and mineral Resources, and Section 4.13, Public Services and Utilities. The commenter's claims of State and Federal Law violations have been noted.

**Sauls, Garret (Letter # 316)**

**316-1:** Regarding negative impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics. With regard to the commenter's hazards concerns, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Regarding the negative impacts on economic growth, pursuant to CEQA Guidelines 15131, CEQA does not require an analysis of economic impacts. Similarly, CEQA does not use the term "environmental justice," centering instead on whether a project may have a significant effect on the physical environment. Statutes and regulations promulgated by State and Local governments address environmental justice concerns outside the CEQA process.

Regarding impacts related to Skylark Airport, refer to Impact TT-3 (VIG) and Impact TT-3 (ASP) in Section 4.15, Transportation and Traffic.

Alternatives are analyzed in Chapter 3.0, Description of Alternatives and Chapter 5.0, Comparison of Alternatives, as well as in Appendix D of the Environmental Impact Report.

**Schanz, Jodi (Letter # 317)**

**317-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Schaper, Greg (Letter # 318)**

**318-1:** See response to comment 114-1.

**Schneller, Kele (Letter # 319)**

**319-1:** The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. Regarding negative impacts on economic growth, pursuant to CPUC § 15131, CEQA does not require an analysis of economic impacts. Regarding health and Safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and mineral Resources, and Section 4.13, Public Services and Utilities. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Sellers, Denise (Letter # 7)**

**7-1:** Regarding impacts related to views, refer to Section 4.1, Aesthetics. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. The commenter's general opposition to the project has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Serrato, Jennifer (Letter # 320)**

**320-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Seung, Joh Young (Letter # 321)**

**321-1:** See response to comment 114-1.

**Shambaugh-Simas, Stephani (Letter # 186)**

**186-1:** See response to comment 133-1.

**Shenouda, Mina (Letter # 322)**

**322-1:** See response to comment 114-1.

**Shepard, Tom and Janice (Letter # 29)**

**29-1:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding traffic impacts, refer to Section 4.15, Transportation and Traffic. Regarding noise impacts, refer to Section 4.11, Noise. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities; however, note that the proposed project does not include the use of radioactive materials. Therefore, there would be no impacts due to radiation. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Sherman, David (Letter # 28)**

**28-1:** Regarding impacts related to public views, refer to Section 4.1, Aesthetics. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Shumaker, Joy (Letter # 323)**

**323-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Silerman, (Letter # 187)**

**187-1:** Regarding allegations that the EIR is flawed, the commenter has not provided specific examples of flawed analyses from the DEIR. Therefore, the commenter's opinion that the DEIR is flawed has been noted, but no further response is required on this topic. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. Regarding the alternatives selection process, refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response can be given.

**Silver, Ron (Letter # 55)**

**55-1:** Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials. Impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant with mitigation. Regarding the CPUC's position on electric and magnetic fields, see Section 2.5.4, Electric and Magnetic Fields. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Sincich, Jerry (Letter # 46)**

- 46-1:** Your support of VIG Alternative M has been noted.
- 46-2:** For a discussion of geological impacts, see section 4.6 of the DEIR. Specifically, see Section 4.6.4.1 “Project Commitment F” that discusses the geotechnical studies the applicant shall conduct of the Alberhill Substation site and all transmission line routes prior to construction. The studies shall include an evaluation of faulting and seismicity risk. The results of the study shall be applied to final engineering designs for the projects and used to determine final tubular steel pole foundation designs. The applicant has agreed in Project Commitment F on page 4.8-34 of the DEIR to “design the proposed substation consistent with the applicable federal, state, and local codes, including the institute of Electrical and Electronic Engineers 693 Standard, Recommended Practices for Seismic Design of Substations. Section 4.6.4.2 contains an impacts analysis of whether the proposed project would “expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides. The applicant is required to follow all laws and regulations. Temescal Valley is adjacent to the VIG8 segment of the proposed project. This segment would be installed underground along Temescal Canyon Road and under I-15, and would transition to an overhead position at a point located across from Ivyglen Substation. Therefore, the Temescal Valley area would not be subject to the potential threats raised by the commenter.
- 46-3:** See the response to comment 46-2 regarding earthquake hazards. For a discussion of impacts on emergency services see Section 4.13, Public Services and Utilities. Section 4.13.4.2 discusses potential impacts to fire, police, and emergency services, which would be less than significant with mitigation.
- 46-4:** See the response to comment 46-2 regarding the location of the project relative to Temescal Valley. For a discussion of impacts on emergency services see Section 4.13, Public Services and Utilities. As noted in the above response to comment 46-3, Section 4.13.4.2 discusses potential impacts to fire, police, and emergency services, which would be less than significant with mitigation. Implementation of MM HZ-4 (Fire Control and Emergency Response) would require the applicant to develop and implement site-specific fire control and emergency response plans to address the risk of fire or other emergencies during construction of the proposed Valley-Ivyglen Subtransmission Line Project. Implementation of MM HZ-4 would reduce potential impacts on fire, police, and emergency service ratios to less than significant levels. Aboveground power lines can hinder initial attack and containment in the event of a fire and pose a collision risk to firefighting aircraft. The applicant would construct and maintain (e.g., vegetation clearing) the power lines according to California code requirements, which would minimize fire hazard and thereby minimize the need for fire-fighting aircraft to travel in proximity to the power lines. Pilots engaged in fire suppression are aware of the hazards posed by power lines, and are provided with transmission line locations. The proposed utilities would mostly be within or adjacent to existing power line rights-of way. Implementation of Mitigation Measure HZ-4 (Fire Control and Emergency Response) would require the applicant to develop and implement site-specific fire control and emergency response plans to address the risk of fire

or other emergencies during construction of the proposed Valley-Ivyglen Subtransmission Line Project.

- 46-5:** Regarding property values, see response to comment 25-4. For a discussion regarding health risks, see Section 4.8, Hazards and Hazardous Materials. For a discussion related to emergency services, see Section 4.13, Public Services and Utilities.
- 46-7:** See response to comment 25-4.
- 46-8:** For a discussion of impacts on hydrology see section 4.9 of the DEIR. Figure 4.9-4 shows flood and dam inundation areas in the proposed project area. The areas near section VIG8 do not lie in a flood zone or inundation hazard area. Therefore flood events are not expected to occur in this area. Impact WQ-7 (VIG) states that sections of 115-kV segments VIG1, VIG3, VIG4, VIG5, and VIG6 would be constructed within 100-year FEMA-designated flood hazard zones, but the impacts would be less than significant with mitigation measure MM WQ-5. In addition, as stated under Impact WQ-9 (VIG), potential impacts due to mudflow would be less than significant after implementation of Project Commitment F.
- 46-9:** See response to comment 46-2 regarding the location of the project relative to the Temescal Canyon area. This section of the project would be underground, therefore the threats raised by the commenter are not applicable in this area.
- 46-10:** See response to comment 25-4.
- 46-11:** The description of ASP Alternative DD has been updated to include construction of the alignment of Temescal Canyon Road as identified in the Serrano Commerce Center Specific Plan (Specific Plan 353).
- 46-12:** See responses to comments 25-4 and comment 46-5.

**Sites, Michelle (Letter # 325)**

- 325-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Slocum, Brian (Letter # 94)**

- 94-1:** See response to comment 73-1.

**Smith and Strunk, Debra and Bill (Letter # 375)**

- 375-1:** The commenter's general objection to the proposed project and general support for undergrounding of the transmission lines has been noted and will be considered by the decision makers. Regarding health and Safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and mineral Resources, and Section 4.13, Public Services and Utilities. Regarding the implications of EMFs, the CPUC's position regarding EMFs is included in Section 2.5.4, Electric and Magnetic Fields. Regarding impacts related to aesthetics and scenic views refer to Section 4.1, Aesthetics. With respect to the potential economic

implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines § 15131. Finally, regarding allegations that the EIR is flawed, the commenter has not provided specific examples of flawed analyses from the DEIR. Therefore, the commenter's opinion that the DEIR is flawed has been noted, but no further response is required.

**375-2:** See response to comment 375-1.

**375-3:** The commenter's concern that Elsinore Valley Municipal Water District involvement in route selection is outside the scope of a CEQA analysis, but has been included in the record and will be reviewed by the decision makers.

**375-4:** The comment has been included in the public record and will be considered by decision makers.

**375-5:** The commenter's support for utilization of the existing 500-kV Serrano Valley line alternative and general support for undergrounding have been included in the public record and will be taken into consideration by the decision makers.

**Smith, Debra (Letter # 188 and # 394)**

**188-1:** The commenter's opposition to the proposed project has been noted. Regarding the CPUC's position on electromagnetic fields, see Chapter 2.0, Description of the Proposed Project, under Section 2.5.4, Electric and Magnetic Fields. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. Regarding traffic impacts, refer to Section 4.15, Transportation and Traffic. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**394-1:** The commenter's support for VIG M and your opposition for the proposed Alberhill project site have been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Smith, Karen & David (Letter # 326)**

**326-1:** See response to comment 114-1.

**Smith, Pamela & Brian (Letter # 327)**

**327-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Sneller, Teri (Letter # 56)**

**56-1:** The commenter's general support for both undergrounding and increased utility development is noted. For an analysis on public views in the project area, see Section 4.1, Aesthetics. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Snyder, Karen & Jim (Letter # 328)**

**328-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Solomon, Lauren (Letter # 329)**

**329-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Stevens, Danny (Letter # 189)**

**189-1:** See response to comment 120-2.

**Stevens, Trudee (Letter # 395)**

**395-1:** The commenter's general support for undergrounding is noted and will be considered by the decision makers. With respect to the potential economic implications of the proposed project, no CEQA analysis of economic impacts is required pursuant to CEQA Guidelines § 15131. Regarding impacts on aesthetics and physical blight refer to Section 4.1, Aesthetics. Regarding health and Safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and mineral Resources, and Section 4.13, Public Services and Utilities.

**Suter, Paul (Letter # 330)**

**330-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Swanson, Doug and Terri (Letter # 62)**

**62-1:** The commenter's general opposition to above ground transmission lines has been noted. Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding property values, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding safety hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. Your support for VIG M has been noted and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Sykes, Regina (Letter # 192)**

**192-1:** See response to comment 131-1.

**Sykes, Regina & Sean (Letter # 191)**

**191-1:** See response to comment 120-2.

[T – Z](#)

**Tainpakdipat, Pasukan (Letter # 372)**

**372-1:** See response to comment 114-1.

**Taylor, Grant (Letter # 332)**

**332-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Tetlow, Deanna (Letter # 333)**

**333-1:** See response to comment 120-2, 121-1, and 128-1.

**Tetlow, Michael (Letter # 334)**

**334-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Thompson, Cara (Letter # 335)**

**335-1:** See response to comment 120-2, 121-1, 133-1, and 134-1. With respect to EMFs, the CPUC's position regarding EMFs is included in Section 2.5.4, Electric and Magnetic Fields.

**Tomsen, Teresa (Letter # 336)**

**336-1:** See response to comment 120-2, 121-1, 128-1, 133-1, and 134-1.

**Torian, Kevin (Letter # 95)**

**95-1:** See response to comment 73-1.

**Torralba, Judy (Letter # 194)**

**194-1:** See response to comment 114-1.

**Trujillo, Angelica (Letter # 98)**

**98-1:** See response to comment 73-1.

**Tucker, Justin (Letter # 338)**

**338-1:** See response to comment 114-1.

**Tucker, Penny (Letter # 339)**

**339-1:** See response to comment 120-2 and 121-1.

**Tupper, Robert (Letter # 340)**

**340-1:** See response to comment 114-1.

**Turton, Amanda (Letter # 341)**

**341-1:** See response to comment 114-1.

**Vance (Letter # 384)**

**384-1:** The commenter's general support for undergrounding has been noted and will be taken into consideration by the decision makers.

**VanderMeer, Rikki (Letter # 90)**

**90-1:** See response to comment 73-1.

**Vasquez, Carlos (Letter # 195)**

**195-1:** See response to comment 114-1.

**Velasquez, Raul (Letter # 342)**

**342-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Velastegui, Oscar (Letter # 344)**

**344-1:** See response to comment 114-1.

**Velastegui, Oscar & Marivel (Letter # 343)**

**343-1:** See response to comment 114-1.

**Velazquez, Anna (Letter # 196)**

**196-1:** See response to comment 114-1.

**Velazquez, Robert (Letters # 197 and # 396)**

**197-1:** See response to comment 114-1.

**396-1:** See response to comment 114-1.

**Veliz, Armando (Letter # 346)**

**346-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Vestal, Erica (Letter # 347)**

**347-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Villasenor, Rose (Letter # 348)**

**348-1:** See response to comment 114-1.

**Villen, Rose (Letter # 198)**

**198-1:** See response to comment 133-1.

**Vinson, Janeane (Letter # 199)**

**199-1:** See response to comment 114-1.

**Walker, Liddy (Letter # 349)**

**349-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Walter, Colleen (Letter # 350)**

**350-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Ward, Becky (Letter # 37)**

**37-1:** Your preference for VIG Alternative M has been noted. Regarding impacts related to public views in the project area, refer to Section 4.1, Aesthetics.

**Washburn, Gary (Letter # 128)**

**128-1:** Regarding negative impacts on economic growth, per CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. Regarding impacts related to blight and aesthetics, refer to Section 4.1, Aesthetics. Regarding the alternatives selection process, refer to Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives, as well as Appendix D. Regarding impacts related to Skylark Airport, refer to Impact TT-3 (VIG) and Impact TT-3 (ASP) in Section 4.15, Transportation and Traffic. Regarding health hazards, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.13, Geology and Mineral

Resources, and Section 4.13, Public Services and Utilities. Regarding the locations of future hearings related to the project, the CPUC acknowledges the commenter's request that future hearings be located in Lake Elsinore. Such requests will be considered by the CPUC when scheduling future hearings. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.

**Washburn, Susan (Letter # 129)**

**129-1:** See response to comment 120-2.

**129-2:** See response to comment 114-1.

**Watson, John (Letter # 351)**

**351-1:** See response to comment 114-1.

**Wemhoff, Tom & Jamie (Letter # 352)**

**352-1:** See response to comment 114-1.

**Wiggins, Dana & Andrea (Letter # 353)**

**353-1:** See response to comment 114-1.

**Wilcher, Keli (Letter # 201)**

**201-1:** See response to comment 133-1 and 134-1.

**Wild, Cynthia (Letter # 72)**

**72-1:** Your opposition to the proposed project has been noted. An alternative site was assessed for the substation site. For more information on Alternatives see Chapter 3.0, Description of Alternative and 5.0, Comparison of Alternatives. The CPUC will decide whether or not to approve the proposed project or an alternative that was discussed in the DEIR. Your comment has been noted.

**Willhide, Toni (Letter # 354)**

**354-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Williams, Stephani (Letter # 355)**

**355-1:** See response to comment 114-1.

**Wilson, Lee (Letter # 356)**

**356-1:** See response to comment 114-1.

**Wilson, Teresa (Letter # 357)**

**357-1:** See response to comment 114-1.

**Wooldridge, Dennis (Letter # 358)**

**358-1:** Regarding potential economic implications of the project, pursuant to CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts.

**358-2:** The project alternatives, and alternative pathways, are discussed in full in Chapter 3.0, Description of Alternatives, and are compared in Chapter 5.0, Comparison of Alternatives, as well as Appendix D. The commenter's general support for undergrounding has been documented and will be taken into account by decision makers.

**358-3:** Regarding the potential economic implications of the project, pursuant to CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts. The commenter's general support for undergrounding has been previously documented and will be taken into consideration by decision makers.

**358-4:** The commenter has not has not raised specific issues addressed in the CEQA context. Therefore, no further response is required.

**358-5:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics. Regarding health and Safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and mineral Resources, and Section 4.13, Public Services and Utilities.

**358-6:** The commenter's general support for undergrounding has been documented and will be taken into account by decision makers. Regarding the potential economic implications of the project, pursuant to CEQA Guidelines § 15131, CEQA does not require an analysis of economic impacts.

**Woolsey, Denise (Letter # 202)**

**202-1:** See response to comment 120-2.

**Wright, Barbara (Letter # 359)**

**359-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Wright, Johnna (Letter # 360)**

**360-1:** Comment noted.

**Yoo, Anna (Letter # 361)**

**361-1:** See response to comment 114-1.

**Young, Audrey (Letter # 362)**

**362-1:** The project alternatives, and alternative pathways, are discussed in full in Chapter 3.0, Description of Alternatives and are compared in Chapter 5.0, Comparison of Alternatives as well as Appendix D.

**362-2:** Regarding impacts related to aesthetics, refer to Section 4.1, Aesthetics.

**362-3:** See Comment 362-2.

**362-4:** See Comment 362-2.

**362-5:** Regarding the potential economic implications of the project, pursuant to CEQA Guidelines Section 15131, CEQA does not require an analysis of economic impacts.

**362-6:** Regarding air quality impacts, refer to section 4.3, Air Quality.

**362-7:** Regarding greenhouse gas emissions and their relationship to climate change, refer to Section 4.7, Greenhouse Gases and Section 6.0, Cumulative Impacts.

**362-8:** Regarding the project's socioeconomic and cultural equitability, the aforementioned concerns are not considered as part of CEQA's environmental analysis and, therefore, no analysis is required.

**362-9:** The project alternatives, and alternative pathways, are discussed in full in Chapter 3.0, Description of Alternatives, and are compared in Chapter 5.0, Comparison of Alternatives, as well as Appendix D.

**362-10:** Regarding the locations of future hearings related to the project, the CPUC acknowledges the commenter's request that future hearings be located in Lake Elsinore. Such requests will be considered by the CPUC when scheduling future hearings.

**Young, Melanie (Letters # 57 and # 79)**

**57-1:** Your support for VIG Alternative M has been noted. Your suggestion to place transmission lines underground has also been noted. The view of and near the substation location is assessed in Section 4.1, Aesthetics. ASP Alt B includes gas-insulated switchgear (Chapter 3.0, Description of Alternatives, and Chapter 5.0, Comparison of Alternatives).

**79-1:** See response to comment 73-1.

**Z, John (Letter # 40)**

**40-1:** Your general support for undergrounding has been noted.

**Zurick, Andryce (Letter # 363)**

**363-1:** See response to comment 120-2, 121-1, 133-1, and 134-1.

**Comments Received During Public Meetings on the DEIR**

**Lake Elsinore Public Meeting, May 11, 2016 (# 385)**

**385-B1:** Comment noted. CPUC will provide DVD copies of the EIR upon request.

**385-B2:** See 385-B1.

**385-B:** Comment noted. The public review for an EIR is 45 days. The CPUC extended the public review period for this EIR for an additional 45 days. Therefore, the public review period for this EIR was 90 days.

**385-B4:** See 385-B3.

**385-B5:** See 385-B3.

**385-C1:** Comment noted.

**385-D1:** Comment noted.

**385-E1:** The CPUC's position regarding EMFs is included in Section 2.5.4, Electric and Magnetic Fields.

**385-F1:** See EIR, Section 1.0, Introduction for history of both projects.

**385-F2:** See 385-F1.

**385-F3:** See 385-F1.

**385-F4:** Comment noted.

**385-H1:** Comment noted.

**385-I1:** Comment noted.

**385-H2:** Comment noted.

- 385-H3:** Comment noted.
- 385-I2:** Comment noted.
- 385-I3:** Comment noted.
- 385-I4:** Comment noted.
- 385-J1:** Comment noted.
- 385-K1:** Comment noted.
- 385-L1:** Regarding the economic impacts of the project, pursuant to CEQA Guidelines Section 15131, CEQA does not require an analysis of economic impacts.
- 385-M1:** See response to comment 385-L1.
- 385-N1:** Comment noted.
- 385-N2:** A map showing the approximate location of transmission towers and poles is included in Section 2.0, Description of the Proposed Projects. Specifically, see Figures 2.2a, 2.2b, 2.2c, 2.2d, 2.2e, 2.2f, 2.2g, 2.2h, and 2.2i. Note that final siting would be determined during final engineering, if the project is approved.
- 385-N3:** A diagram of the proposed Alberhill Substation is included in Section 2.0 of the EIR as Figure 2-7. Building dimensions are discussed in Section 2.3.2.1, Alberhill Substation. Finally, visual simulations are contained in Section 4.1, Aesthetics.
- 385-N4:** See response to comment 385-N4.
- 385-N5:** Comment noted.
- 385-P1:** Comment noted.
- 385-P2:** Comment noted.
- 385-P3:** Comment noted.
- 385-Q1:** Comment noted.
- 385-R1:** Comment noted.
- 385-R2:** See response to comment 385-R1.

- 385-R3:** See response to comment 385-R1.
- 385-R4:** See response to comment 385-R1.
- 385-S1:** Comment noted.
- 385-S2:** A map showing the approximate location of transmission towers and poles is included in Section 2.0, Description of the Proposed Projects. Specifically, see Figures 2.2a, 2.2b, 2.2c, 2.2d, 2.2e, 2.2f, 2.2g, 2.2h, and 2.2i. Note that final siting would be determined during final engineering, if the project is approved.
- 385-S3:** Aesthetic impacts are discussed in Section 4.1. Visual simulations are included in the Environmental Impact Report as Figures 4.1-4a, 4.1-4b, 4.1-4c, 4.1-4d, 4.1-4e, 4.1-4f, 4.1-4g, 4.1-4h, 4.1-4i, 4.1-4j, 4.1-4k, 4.1-4l, 4.1-4m, 4.1-4n, 4.1-4o, and 4.1-4p.
- 385-S4:** See response to comment 385-S3.
- 385-S5:** Pursuant to Section 4.1, the following mitigation measures are included with regard to aesthetic impacts: MM AES-1: Staging Area Screening; MM AES-3: Glare Reduction; MM AES-4: Lake Street Pole Placement and Landscaping; MM AES-5: Night Lighting during Construction; MM AES-7: Alberhill Substation Visual Treatments; MM AES-8 Treatment of 500-kV Transmission Towers; MM AES-9: Use Self-Weathering Steel Poles; and MM AES-10: Undergrounding on Murrieta Road. See Chapter 9.0 of the Final EIR for revised mitigation measures.
- 385-S6:** See responses to comments 385-S3 and S5.
- 385-S7:** The aesthetic impacts of the proposed projects are discussed in Section 4.1, Aesthetics.
- 385-S8:** Your comment has been included in the public record and will be considered by the decision makers.
- 385-S9:** Your comment has been included in the public record and will be considered by the decision makers.
- 385-S10:** Section 4.0 discusses the methodology and significance criteria. Pursuant to the EIR “The impacts analyses presented in this chapter are based on methodologies used to determine whether and how each of the proposed projects affects a resource area. Methodologies for impact assessment are presented under this heading for each resource area section. Significance criteria serve as a benchmark for determining if the proposed projects would result in significant impacts when evaluated against the baseline conditions established in the environmental setting and regulatory setting sections for each resource area. The significance criteria used are from the checklist presented in the CEQA Guidelines (Appendix G).” With specific regard to aesthetics significance criteria, see Section 4.1.3, Methodology and Significance Criteria.

- 385-S11:** Impacts to biological resources are discussed in Section 4.4. Pursuant to Section 4.4, all biological impacts can be mitigated to less than significant or were less than significant.
- 385-S12:** Your comment has been included in the public record and will be considered by the decision makers.
- 385-S13:** Your comment has been included in the public record and will be considered by the decision makers.
- 385-S14:** Your comment has been included in the public record and will be considered by the decision makers.
- 385-S15:** Your comment has been included in the public record and will be considered by the decision makers.
- 385-S16:** A full description of the Valley-Ivyglen Project is contained in the following sections of the EIR: Section 2.1.1, Valley-Ivyglen Project Overview; Section 2.2.1, Valley-Ivyglen Project Location; Section 2.3.1, Components of the Proposed Valley-Ivyglen Project; Section 2.4, Construction of the Proposed Project; Section 2.5, Operation and Maintenance of the Proposed Projects; Section 2.6, Project Commitments; Section 2.7, Permitting and Consulting Requirements.
- 385-S17:** See response to comment 385-S16.
- 385-S18:** Comment noted.
- 385-S19:** Comment noted.
- 385-S20:** Comment noted.
- 385-S21:** A discussion and comparison of Alternatives may be found in Section 5.0, Comparison of Alternatives. Moreover, the Valley-Ivyglen Subtransmission Line and Alberhill System Projects EIR Alternatives Screening Report and Addendum may be found in Appendix D.
- 385-S22:** Comments are considered by the decision makers in their rationale for approving or denying a project. In this instance, the CPUC is the lead agency and will ultimately decide whether or not to approve the project, and all comments received during the public comment period will be taken into consideration.
- 385-S23:** The aesthetic impacts of the proposed projects are discussed in Section 4.1, Aesthetics. Additionally, the EIR analyses the potential environmental impacts of a project as well as alternatives to the proposed project. However, it does not undertake design determinations.
- 385-S24:** Comment noted.

- 385-T1:** Your support for VIG M and your concerns regarding the aesthetic impacts of the project will be taken into consideration by the decision makers. The commenter has not raised specific claims regarding the adequacy of the EIR; therefore, no further response is required.
- 385-U1:** Regarding impacts related to aesthetics and scenic views, regard to Section 4.1, Aesthetics. Regarding health and safety impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. With specific regard to EMFs, the CPUC’s position regarding EMFs is included in Section 2.5.4, Electric and Magnetic Fields. Finally, the commenter’s general support for undergrounding has been documented and will be taken into consideration by decision makers.
- 385-V1:** Your comment has been included in the public record and will be considered by the decision makers.
- 385-W1:** The commenter’s suggested alternative is broadly discussed as VIG Alternative K in the Alternatives Screening Report. VIG Alternative K was eliminated for failure to avoid or reduce a potentially significant effect of the proposed Valley-Ivyglen project and would not be legally feasible; therefore, it was eliminated from further consideration.
- 385-X1:** The commenter appears to reference VIG Segment 3. Segment 3 would be primarily installed overhead on the proposed 115-kV structures with the exception of approximately 338 feet in a new underground conduit along Third Street and across Collier Avenue.
- 385-X2:** Comment noted.
- 385-X3:** See response to comment 385-X1.
- 385-X4:** Your support for undergrounding alternatives has been documented and will be considered by the decision makers.
- 385-X5:** Comment noted.
- 385-Y1:** Your comment has been included in the public record and will be considered by the decision makers.
- 385-Y2:** See response to comment 385-X1.
- 385-Z1:** Regarding impacts to aesthetics, refer to Section 4.1, Aesthetics. Your support for VIG Alternative M has been noted and will be considered by the decision makers. Moreover, regarding undergrounding alternatives, refer to Section 3.0, Description of Alternatives and Section 5.0, Comparison of Alternatives, as well as Appendix D.
- 385-AA1:** Comment noted.
- 385-BB1:** Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. All other

environmental implications are discussed in Sections 4.1, Aesthetics through 4.15, Transportation and Traffic.

**385-BB2:** See response to comment X1.

**385-BB3:** Your support for undergrounding alternatives has been documented and will be taken into consideration by the decision makers. Regarding health impacts, refer to Section 4.8, Hazards and Hazardous Materials, Section 4.6, Geology and Mineral Resources, and Section 4.13, Public Services and Utilities. All other environmental implications are discussed in Sections 4.1, Aesthetics through 4.15, Transportation and Traffic.

**385-BB4:** See response to comment 385-BB3. In addition, regarding economic impacts, pursuant to CEQA Guidelines Section 15131, CEQA does not require analysis of economic impacts.

**385-CC1:** Regarding biological impacts, see Section 4.4. Comment noted.

**385-CC2:** Your comment has been included in the public record and will be considered by the decision makers.

**385-CC3:** Impacts related to dust are discussed in Section 4.3, Air Quality. Impacts related to noise are discussed in Section 4.11, Noise and Vibration. Finally, impacts related to lighting are discussed in Section 4.1, Aesthetics. Your comment has been included in the public record and will be considered by the decision makers.

**385-DD2:** Your comment has been included in the public record and will be considered by the decision makers. Additionally, the Applicant will be responsible for the costs of mitigation efforts rather than Lake Elsinore or the surrounding cities.

**385-DD3:** Comment noted.

**385-DD4:** Comment noted.

**385-DD5:** Comment noted.

**385-EE1:** Regarding impacts to aesthetics, refer to Section 4.1, Aesthetics. Regarding economic impacts, pursuant to CEQA Guidelines 15131, no analysis of economic impacts are required.

**385-EE3:** Comment noted.

**385-A30:** Comment noted.

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**386-B1:** Comment noted. See FEIR, Section 2.2.1.

**386-B2:** See response to comment 386-B1.

**386-C1:** Comment noted.

**386-C2:** Comment noted.

**386-D1:** It has been determined that Alternative DD is not the Environmentally Superior Alternative. The Valley Substation is a large developed substation located in a constrained area. It is impractical to continue indefinitely modifying and adding capacity to a single 500-kV substation. Reliable electrical service requires that power be decentralized so that no one substation carries the entire load. See Appendix K.

**386-E1:** As noted in the FEIR, Section 4.11.4, light duty helicopters used during construction of the Valley-Ivyglen Project may result in significant and unavoidable impact for sensitive receptors located along the flight paths in the proximity of staging areas. In order to address these issues, the applicant would implement Project Commitment H. Project Commitment H, found in Chapter 4.11.4.1 of the FEIR, requires limiting construction hours, utilizing noise reduction modalities, and notification of sensitive receptors prior to construction begins.

The Alberhill System Project may require use of medium or heavy-duty helicopters during the construction period, which would result in significant and unavoidable impacts with respect to noise. However, the applicant would limit takeoff and landing to established helicopter landing area or at staging areas.

**386-E2:** Comment noted.

**386-F1:** Comment noted. See FEIR, Section 1.1.1.

**386-F2:** See response to comment 386-F1.

**386-G1:** Comment noted. See FEIR, Section 4.1.4.2.

**386-G2:** See response to comment 386-G1.

**386-G3:** See response to comment 386-G1.

**386-H1:** See response to comment 386-D1.

**386-I1:** Comment noted. See FEIR, Section 1.1.

**386-I2:** Comment noted. See FEIR, Section 1.2.

**386-J1:** See response to comment 386-D1.

**386-J2:** See response to comment 386-D1.

**386-J3:** See response to comment 386-D1.

- 386-K1:** See response to comment 386-G1.
- 386-K2:** See response to comment 386-G1.
- 386-K3:** See response to comment 386-G1.
- 386-K4:** Comment noted. See FEIR, Section 2.3.2.3.
- 386-K5:** See response to comment 386-K4.
- 386-K6:** See response to comment 386-K4.
- 386-L1:** See response to comment 386-E1.
- 386-M1:** See response to comment 386-D1.
- 386-M2:** Comment noted.
- 386-N1:** Comment noted. See FEIR, Section 1.1.
- 386-N2:** See response to comment 386-N1.
- 386-N3:** See response to comment 386-D1.
- 386-N4:** See response to comment 386-D1.
- 386-N5:** Comment noted.
- 386-N6:** Comment noted.