



CALIFORNIA PUBLIC UTILITIES COMMISSION

SOUTHERN CALIFORNIA EDISON CIRCLE CITY SUBSTATION AND MIRA LOMA-JEFFERSON 66 KV SUBTRANSMISSION LINE PROJECT

Final Environmental Impact Report

December 2018



A.15-12-007

State Clearinghouse No. 2016021012

Prepared for:
California Public Utilities Commission

Prepared by:
Environmental Science Associates





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CHAPTER 1

Introduction

1.1 Purpose of this Document

The California Environmental Quality Act (CEQA) and its implementing regulations (the “CEQA Guidelines”) require a lead agency to prepare and certify a Final Environmental Impact Report (EIR) before it may approve a project for which a Draft EIR has been prepared. This document and the May 2018 Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project Draft EIR (SCH No. 2016021012) together constitute the Final EIR for the Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project (Project) proposed by Southern California Edison (Applicant, SCE).

On June 4, 2018, the California Public Utilities Commission (CPUC, the CEQA lead agency) released the Draft EIR on the proposed Project for public review and comment. The Draft EIR was available for public review at public libraries located in the vicinity of the proposed Project site, and online on the CPUC’s website for the Project.

The Draft EIR describes the proposed Project and its environmental setting; analyzes potential direct, indirect, and cumulative environmental impacts related to the construction, operation, and maintenance of the proposed Project; identifies impacts that could be significant; recommends mitigation measures, which, if adopted, could avoid or minimize such impacts; and identifies impacts that are expected to remain significant and unavoidable, even with the implementation of recommended mitigation measures. The Draft EIR also evaluates alternatives to the Proposed Project as required by CEQA, including the No Project Alternative scenario.

The public review and comment period for the Draft EIR began June 4, 2018, and lasted for a period of 47 calendar days, through July 20, 2018. The CPUC held two public meetings; one on June 27, 2018, and one on June 28, 2018, in order to accept comments on the Draft EIR from agencies, organizations, and individuals in a public setting. Both meetings occurred in the evening from 6:30 to 8:00 p.m. The first meeting was held at the Circle City Center, located at 365 North Main Street in Corona, California. The second meeting was held at the Eastvale Community Center, located at 13820 Schleisman Road in Eastvale, California. The CPUC provided notification of the public review period and details regarding the public hearings to: 1) public agencies; 2) adjacent property owners and residents; 3) listed parties on the CPUC service list, and 4) agencies, organizations, and individuals that submitted comments on the Notice of Preparation (NOP) for the Draft EIR on the Project. The public was also notified of the release of the Draft EIR through public notices published on June 4 and June 18, 2018, in the San Bernardino County Sun and the Press-Enterprise, which are newspapers of general circulation in

the proposed Project area. Oral comments were received at the June 27 and 28, 2018, public meetings and written comments were due by July 20, 2018.

This Final EIR will be used by the CPUC, in conjunction with other information developed in the CPUC's formal record, to act on the Applicant's Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project application for a Permit to Construct (PTC). Prior to its final decision on the application, the CPUC will determine the adequacy of this Final EIR and, if adequate, will certify the document as complying with CEQA.

1.2 Project Overview

The proposed Project would result in construction of the new 66/12 kilovolt (kV) low profile 56 megavolt-ampere (MVA) Circle City Substation on a 19.5-acre site in the City of Corona; four new 66 kV double-circuit source lines; the new Mira Loma-Jefferson 66 kV Subtransmission Line; relocation of approximately 1.9 miles of an existing overhead 33 kV distribution line to accommodate the new Mira Loma-Jefferson subtransmission line, and installation of new or upgraded telecommunications equipment. The Project is proposed to ensure the availability of safe and reliable electrical services and provide additional capacity to address forecasted demand requirements in the Electrical Needs Area (ENA). The Project would be located in portions of northwestern Riverside County, including the cities of Corona, Eastvale, and Norco; and in portions of San Bernardino County, including the cities of Chino and Ontario. The proposed Project components are described in detail in Draft EIR Chapter 2, *Project Description*.

A description of the environmental baseline, i.e., the environmental setting used to determine the impacts associated with the proposed Project and alternatives, is provided at the beginning of each of the environmental issue area sections in Draft EIR Chapter 5, *Environmental Analysis*.

1.3 Clarifications to the Draft EIR

Clarifications have been made to the Draft EIR in response to comments received during the Draft EIR comment period. In addition, subsequent to the release of the Draft EIR, SCE provided the CPUC with an updated 10-year power flow forecast for the Project electrical needs area (ENA) for the period of 2018 through 2027. A summary and discussion of the revised power flow forecast has been added to Draft EIR Chapter 1, *Introduction* (see Final EIR Chapter 4, *Revisions to the Draft EIR*). Also, to provide the CPUC Commissioners with additional information to support the decision process, Draft EIR Chapter 5, *Comparison of Alternatives*, has been supplemented to include rankings of the Project alternatives relative to environmental superiority. Two sets of rankings have been added; one for the Subtransmission Service Objective, and another for the Distribution Service Objective (see Final EIR Chapter 4, *Revisions to the Draft EIR*). None of these revisions result in significant new information that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

1.4 Organization of Final EIR

As required by CEQA Guidelines Section 15132, the Final EIR consists of the following elements:

- (a) The Draft EIR with revisions incorporated;
- (b) Verbatim comments received on the Draft EIR;
- (c) A list of persons, organizations, and public agencies that commented on the Draft EIR (note that private individual names and contact information of the public have been redacted for privacy);
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the lead agency.

The Final EIR for the proposed Project contains information in response to concerns that were raised during the public comment period (June 4, 2018 through July 20, 2018). Responses were prepared for each comment received during the public comment period and through the end of July, 2018, and are presented in Chapter 3, *Comments and Responses*.

This Response to Comments document is separated into two volumes.

Volume 1 consists of four chapters.

- **Chapter 1** is an introductory chapter that describes the purpose as well as the organization of the Final EIR, and provides a brief description of the proposed Project.
- **Chapter 2** describes the public review process and the organization of the comment letters, and lists the commenters (agencies, organizations, and individuals, as well as oral commenters at the public meeting).
- **Chapter 3** contains copies of all the comment letters received on the Draft EIR as well as copies of the transcripts for the public meetings held on June 27, 2018, and June 28, 2018. Individual comments are identified within the comment letter or transcript using an alphanumeric code. The names and contact information has been redacted on letters and transcribed comments from private individuals. Following each comment letter are individual responses directed specifically to each comment. This chapter also contains master responses, which provide comprehensive discussions to respond to select sets of issues that received multiple comments. Each master response includes cross references to the individual comments being addressed, using the alphanumeric code within the comment letter or transcript.
- **Chapter 4** contains all text revisions to the Draft EIR, which includes both (1) revisions and clarifications to include updated information and (2) text and figure revisions as a result of responding to comments, as shown in Chapter 3.

Volume 2: Appendices, provides supporting documentation for information presented in the Response to Comments document. A digital copy of the Draft EIR as revised per described in Final EIR Chapter 4, and this Response to Comments document is included on a USB flash drive at the end of this document.

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CHAPTER 2

Public Review Process

This chapter describes the public review process and the organization of the comment letters, and lists the public agencies, organizations, and individuals that provided comments on the Draft EIR.

2.1 Opportunities for Public Comment on the Draft EIR

2.1.1 Notification

On June 4, 2018, the CPUC published and distributed the Notice of Availability (NOA) of a Draft EIR to advise interested local, regional, and state agencies, and the public, that a Draft EIR had been prepared and published for the proposed Project. Fifteen copies of the NOA and Draft EIR were sent to the State Clearinghouse of the Office of Planning and Research, which were dispersed to reviewing State agencies. The NOA was also sent directly to property owners within 300 feet of the Project routes and sites, as well as to responsible and trustee agencies, individuals that had previously shown interest in the Project, and parties of the Proceeding. The NOA solicited both written and oral comments on the Draft EIR during a 47-day public comment period (June 4, 2018 through July 20, 2018), and provided information on two forthcoming public comment meetings. Additionally, the NOA presented the background, purpose, description, and location of the proposed Project, as well as the contact name to request additional information about the Draft EIR.

In addition to the NOA, the CPUC notified the public about the June 27 and 28, 2018 public meetings (to receive comments on the Draft EIR) through multiple newspaper legal advertisements and through the CPUC's website for the proposed Project. The CPUC published legal advertisements in the Press Enterprise and the San Bernardino County Sun newspapers on June 4 and 18, 2018. The Press Enterprise is a daily newspaper of general circulation in Riverside County; the San Bernardino County Sun is a daily newspaper of general circulation in San Bernardino County. Additionally, an electronic copy of the NOA and the Draft EIR were posted on the CPUC's website at:

http://www.cpuc.ca.gov/Environment/info/esa/Circle_City/index.html.

The NOA and newspaper legal advertisements are provided in Appendices A and B, respectively. Notifications provided basic proposed Project information; the date, time, and locations for the public meetings; and a brief explanation of the public meeting process. The public was encouraged in the NOA, newspaper legal advertisements, and at the public meetings to submit written comments and concerns regarding the proposed Project and the adequacy of the Draft EIR by mail, or email to the CPUC.

2.1.2 Public Comment Meetings

The CPUC held two public meetings in the proposed Project area to accept comments on the Draft EIR from agencies, organizations, and individuals. The first public meeting was held on June 27, 2018, at 6:30 p.m. at the Circle City Center, which is located at 365 N. Main Street in Corona, California. The second public meeting was held on June 28, 2018, at the Eastvale Community Center, which is located at 13820 Schleisman Road in Eastvale, California. Refer to Appendix C for the public meeting sign-in sheets with names and contact information redacted for privacy. The CPUC provided notification of the public review period and the public meeting to: 1) public agencies; 2) adjacent property owners; and 3) organizations that had demonstrated particular interest in the proposed Project, e.g., through requesting a notice or participating in the scoping process. Oral comments were received at the June public meetings and written comments were due by July 20, 2018. Comments that were received within a few days after the end of the comment period were accepted.

A presentation (Appendix D) was given at the public meetings that included an overview of the CPUC's decision-making process, including the environmental review process; the regional context; proposed Project background; Project objectives; Proposed Project description; project alternatives; and role of the public comments. During and following the presentation, public comments were recorded. All attendees were also encouraged to submit written comments.

2.2 Comments on the Draft EIR

Pursuant to CEQA Guidelines Section 15088(b), the CPUC sent this Final EIR that contains written responses to all agencies that commented on the Draft EIR well in advance of the 10 days prior to certification requirement. The CPUC also sent the Final EIR to all commenting groups and private individuals that provided contact information. Below are summaries of the written comments and comments received at the public meetings held for the Draft EIR.

2.2.1 Written Comments

Numerous comment letters were received from agencies, organizations, and individuals during the Draft EIR review period. A total of 20 letters were received from agencies and organizations. A total of 26 comment letters were received from individuals. The comment letters received on the Draft EIR through the end of July 2018, are listed below in Section 2.3. Each comment letter has been assigned an alphabet letter and a comment number designating order of receipt within each of the categories identified above. Letters from agencies and organizations (including Southern California Edison, the Applicant) are designated with the letter "A," and letters from individuals are designated by the letter "B." For example, the second letter received from an agency or organization was from the Corona Historic Preservation Society, and is identified as letter A2. Discrete comments within letters are marked sequentially with numbers, such as B2-1, B2-2, etc. Copies of all letters received through July, 2018 are provided in Chapter 3, *Comments and Responses*.

2.2.2 Public Meeting Comments

As noted above, the first public meeting was held on June 27, 2018, from 6:30-8:00 p.m. in the City of Corona, and the second public meeting was held (at the same time) on the following evening, June 28, 2018 in the City of Eastvale. Eleven members of the public and agency representatives attended the June 27 meeting, and 16 members of the public and agency representatives attended the June 28 meeting. Transcripts including oral comments made by individuals who spoke at the public meetings are provided in Section 3.4. Oral comments received at the public meeting are designated by the letter “C.” Speakers were encouraged to submit follow-up written comments so that the full text and intent of their comments could be documented and addressed. Written comments, if submitted, were assigned separate letter designations as shown in the table below.

2.3 List of Commenters

Table 2-1 lists all the agencies, groups, and organizations that provided written comments on the Draft EIR.

**TABLE 2-1
LIST OF WRITTEN COMMENT LETTERS FROM AGENCIES, GROUPS, AND ORGANIZATIONS**

Letter	Commenter	Date of Comment
A1	South Coast Air Quality Management District	June 12, 2018
A2	Corona Historic Preservation Society	June 15, 2018
A3	California Department of Transportation	June 15, 2018
A4	Native American Heritage Commission	June 21, 2018
A5	City of Corona D. Peffer	June 21, 2018
A6	Agua Caliente Band of Cahuilla Indians	July 3, 2018
A7	City of Eastvale (B. Jones)	July 10, 2018
A8	City of Eastvale (B. Jones, I. Bootsma)	July 12, 2018
A9	Riverside County Flood Control and Water Conservation District	July 17, 2018
A10	Gabrieleno Band of Mission Indians	July 17, 2018
A11	Circle City Substation Task Force	July 18, 2018
A12	San Bernardino County	July 19, 2018
A13	City of Norco	July 19, 2018
A14	City of Ontario	July 19, 2018
A15	Rincon Band of Luiseño Indians	July 20, 2018
A16	City of Corona (Braun Blaising Smith Wynne, P.C.)	July 20, 2018
A17	Corona Chamber of Commerce	July 20, 2018
A18	City of Chino	July 20, 2018
A19	Chino Preserve Development Corporation	July 20, 2018
A20	Southern California Edison	July 20, 2018

Table 2-2 lists all the comment letters from individual members of the public received on the Draft EIR.

**TABLE 2-2
LIST OF WRITTEN COMMENT LETTERS FROM INDIVIDUAL MEMBERS OF THE PUBLIC**

Letter	Commenter	Date of Comment
B1	Baxter Miller	June 18, 2018
B2	Kristina Jovin	June 27, 2018
B3	Richard Monroe	June 27, 2018
B4	Dickie Simmons	June 28, 2018
B5	Kai Liu	June 29, 2018
B6	Jane Anderson	July 9, 2018
B7	Maggie Wang	July 11, 2018
B8	Andy Diaz	July 15, 2018
B9	Lauren Pavlock	July 16, 2018
B10	Robert Peak	July 16, 2018
B11	Jack and Sherry Vandeman	July 16, 2018
B12	Scott Detki	July 18, 2018
B13	Brittney Detki	July 18, 2018
B14	Sayeh Koetsier	July 18, 2018
B15	Norene Eifler	July 18, 2018
B16	James Alderson	July 19, 2018
B17	Steve Tuthill	July 19, 2018
B18	Jay Ballesteros	July 20, 2018
B19	Brandon Plott (Councilmember City of Eastvale)	July 20, 2018
B20	Colleen Powers	July 20, 2018
B21	Natalie George	July 20, 2018
B22	Tom Eifler	July 20, 2018
B23	Fidencio Zepeda	July 20, 2018
B24	Rushbahh Shah	July 20, 2018
B25	Tom Eifler (and the citizens of Norco)	July 20, 2018
B26	Wendy Lacambra	July 22, 2018

Table 2-3 identifies the individuals that provided oral comments on the Draft EIR during the June 27 and 28, 2018, public meetings.

**TABLE 2-3
LIST OF ORAL COMMENTERS AT THE DRAFT EIR PUBLIC MEETINGS**

Commenter	Date of Public Meeting
Tom Eifler	June 27, 2018
Richard Monroe	June 27, 2018
Jim Pollard	June 27, 2018
Karen Spiegel, City of Corona Mayor	June 27, 2018
Todd Rigby	June 28, 2018
Andrea Heve	June 28, 2018
Ralph Dilisio, Jr.	June 28, 2018
Dick Simmons	June 28, 2018
Jim Pollard	June 28, 2018
Enswins Cordero	June 28, 2018

2.4 Final EIR

The Lead Agency (the CPUC), the project Applicant (SCE), and listed parties on the CPUC Proceeding service list received a hard copy of the Final EIR. Other agencies, organizations, and individuals that submitted comments on the Draft EIR received a USB flash drive with the Final EIR. Appendix E lists all recipients of the Final EIR and contains the Certificate of Service and Appendix F includes the Mitigation Monitoring, Reporting, and Compliance Program.

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CHAPTER 3

Comments and Responses

3.1 Master Responses

3.1.1 Master Response 1: Underground versus Overhead Subtransmission Lines

Summary of Issues Addressed in Master Response 1

Commenters have expressed a desire for the 66 kV subtransmission lines proposed by SCE as part of the Project to be installed underground. This response discusses issues associated with undergrounding of subtransmission lines compared to the installation of overhead subtransmission lines.

Summary of Commenters and Comments

Commenter	Comments Addressed by Master Response 1
City of Eastvale	A7-4, A7-9
Circle City Substation Task Force	A11-12
City of Norco	A13-5
City of Corona	A16-6, A16-31, A16-32
Individual Commenters	B5-2, B5-6, B6-3, B7-1, B8-3, B9-3, B10-3, B10-5, B11-2, B12-3, B13-3, B14-9, B15-3, B16-3, B18-3, B21-2, B22-3, B23-4, B24-4, B25-2, B25-12, B25-13, B26-4, C1-10, C1-13, C1-17, C1-21, C1-28, C1-31, C2-1, C2-14, C2-19, C2-27, C2-34.

Response

Underground versus Overhead Subtransmission Lines

Although there may be aesthetic and other environmental benefits to placing a subtransmission line underground, the underground installation of all or portions of the subtransmission and source lines would result in greater overall environmental impacts compared to overhead construction.

Underground construction of portions of the subtransmission source lines would require extensive trenching to install the duct banks that would carry the subtransmission wires and related infrastructure. The additional mechanized equipment, related fuel use and exhaust, surface and subsurface disturbance, and number of days required to complete the trenching work would not be required for the proposed overhead construction; therefore, underground construction would result in greater impacts related to air quality, erosion, biological resources, noise, and traffic; and could

result in greater impacts to cultural resources compared to the proposed construction of overhead lines. Underground installations are more material-intensive than overhead installations. As indicated by the Applicant's Underground Structures Standards (UGS) Manual, underground installation requires the following types of materials that are either not required at all or required in lesser amounts for overhead installations: concrete, steel, precast reinforced concrete structures and pull ropes, conduits, fittings and risers, hand holes and pull boxes, manholes and vaults (poured and precast), semi-buried structures, frames, covers, and accessories (SCE, 2012). Undergrounding also results in the need for large aboveground transition structures to connect the conductor wires between aboveground and underground structures.

Similarly, maintenance and repair of underground facilities could require more time and cause greater impacts than the maintenance and repair of overhead facilities because accessing the subsurface line could cause construction-related effects associated with isolating the issue area, excavating a work area sufficiently sized for access and safety, and then refilling/reburying the affected area. These activities would cause greater operational impacts related to air quality, erosion, biological resources, noise; and traffic compared to the proposed maintenance of overhead lines. In instances where repair and maintenance of a subsurface line could be accomplished without surface disturbance (e.g., by manipulating the line via underground access points), working in vaults or other access ways would require lighting and attention to subsurface hazard considerations that would not be associated with aboveground work. Further, because underground lines are encased in concrete, it generally is more difficult to locate and repair problems, which can prolong the time of service interruptions before power is restored.

Other, non-environmental factors also affect whether to install power lines underground. For example, as a state-regulated utility, SCE has a duty to ratepayers to propose options that are cost-effective. Underground subtransmission lines require more extensive (and therefore more expensive) engineering design to install ducts and structures underground, and the underground cable itself is significantly more expensive than overhead wire. SCE has stated that the cost for installing a new overhead 66 kV single circuit in a metropolitan area is approximately \$0.33 million per 1,000 feet and the cost to install a new underground 66 kV single circuit is approximately \$1.13 million per 1,000 feet, reflected in 2016 constant dollars (SCE, 2017). This indicates that underground line construction is approximately 3.5 times more expensive than overhead line construction.

Potential visual impacts regarding the proposed Mira Loma-Jefferson subtransmission lines and the Source Lines are discussed in Draft EIR Section 4.1, *Aesthetics*. The methodology used to evaluate impacts to visual resources is described Section 4.1.2.1, *Definition and Use of Significance Criteria*. Definitions relating to the analysis of visual resources, including metrics used to define overall visual sensitivity of the Project area, are provided in Draft EIR aesthetics Section 4.1.1.1, *Definitions Related to Visual Resources*. The determination of impact significance is based on the combined factors of overall visual sensitivity and the degree of overall visual change.

As described in the Draft EIR aesthetics Impacts 4.1-1 and 4.1-3 discussions, the analysis of potential aesthetics impacts of the proposed Project determined that discrete aboveground

segments of the proposed Pedley Source Lines, Databank Source Lines, and Mira Loma-Jefferson subtransmission line would substantially degrade the visual character of the area, resulting in significant impacts. Those segments are summarized below by Project component.

Pedley Source Lines:

- The vicinity of the Interstate 15 crossing; and
- East 6th Street near Magnolia Avenue.

Databank Source Lines:

- Magnolia Avenue from the proposed new riser pole site near Sherborn Street to a location near the proposed Circle City Substation site.

Mira Loma-Jefferson 66 kV Subtransmission Line:

- Hellman Avenue where the line would be along the east side of the road.

Implementation of Mitigation Measure 4.1-1 would lessen the significant effects along these segments by reducing the visual contrast created by the new source lines and subtransmission line conductors and poles, by requiring conductors to be non-specular and non-reflective and insulators to be non-reflective, but the impacts would remain significant and unavoidable. However, as discussed in the Draft EIR analysis of aesthetics in Section 4.1.5, *Alternatives*, all of the long-term significant visual impacts of the Project could be avoided while resulting in no new significant impacts with implementation of alternatives that would require undergrounding of discrete segments along Hellman Avenue (i.e., Alternative C1) and from Interstate 15 to Circle City Substation (i.e., Alternative E2) and/or installation of a 12 kV distribution-level battery storage facility that would avoid installation of the substation source lines (i.e., Alternative D1).

The long-term visual impact of the other portions of the overhead subtransmission and source lines not discussed above would be less-than-significant relative to the existing baseline conditions in those areas (see, e.g., Photographs 1 through 38 in the Draft EIR analysis of aesthetics in Section 4.1.1.2, *Existing Visual Quality of the Region*). Under these circumstances, CEQA does not provide a basis for the lead agency to impose undergrounding as a mitigation measure to reduce less-than-significant effects. Consequently, it would not be appropriate for the Draft EIR to recommend mitigation that would require proposed new source lines and subtransmission lines to be placed below ground along these segments.

3.1.2 Master Response 2: Non-CEQA Issues

Summary of Issues Addressed in Master Response 2

2A. Electric and Magnetic Fields

Commenters expressed concerns about effects associated with electric and magnetic fields (EMFs). This response discusses the CPUC policy for evaluation of EMFs in CEQA reviews.

2B. Economic Impacts

Commenters expressed concerns about the proposed Project’s effects on property values and other economic impacts.

Summary of Commenters and Comments

Commenter	Comments Addressed by Master Response 2
City of Eastvale	A7-4
City of Norco	A13-3, A13-4
City of Corona	A16-6, A16-19
Corona Chamber of Commerce	A17-6
Individual Commenters	B1-1, B2-3, B3-3, B5-5, B8-2, B9-2, B10-3, B10-4, B10-5, B11-2, B12-2, B13-2, B14-2, B14-3, B14-5, B14-7, B15-2, B16-2, B17-1, B17-2, B18-3, B19-2, B20-1, B21-2, B22-2, B23-3, B24-2, B24-3, B25-6, B25-8, B26-3, C1-4, C1-7, C1-8, C1-12, C1-18, C1-25, C1-26, C1-29, C2-2, C2-7, C2-8, C2-15, C2-27, C2-32, C2-33.

Response

2A. Electric and Magnetic Fields

Multiple comments were received that expressed concerns regarding EMFs that are perceived to present health risks for the public. The potential relevance and effects of EMFs are discussed in Draft EIR Project description Section 2.11, *Electric and Magnetic Fields Summary*, and Appendix C, *(EMF) Field Management Plan*. As described in Section 2.11 and Draft EIR Appendix A, *Scoping Report* (see page A-27), the EIR does not consider EMFs in the context of the CEQA analysis of potential environmental impacts because 1) there is no agreement among scientists that EMFs create a potential health risk; and 2) there are no defined or adopted CEQA standards for defining health risk from EMFs. Draft EIR Section 2.11 describes the CPUC’s approach to analysis of EMFs, which is to consider it outside the scope of the EIR, in the absence of regulations or standards that would inform significance determinations. In compliance with CPUC Decisions 93-11-013 and 06-01-042, Appendix C to the Draft EIR is a Field Management Plan that includes quantitative estimates of EMFs that would be generated by the Project and describes the measures SCE would implement, to reduce magnetic field levels caused by the Project.

Presently, there are no applicable federal, State or local regulations related to EMF levels from power lines or related facilities, such as substations. However, CPUC policies and procedures (as reflected in Decision D.06-01-042) require utilities to incorporate ‘low-cost’ or ‘no-cost’ measures for managing EMFs from power lines up to approximately four percent of the total Project cost.

The Draft EIR describes the CPUC staff’s approach to analysis of EMF, which is to consider it outside the scope of the EIR in the absence of regulations or standards that would inform significance determinations.

2B. Economic Impacts

Numerous commenters expressed concern about potential adverse effects on property values with the placement of new Project poles near their properties.

Under CEQA, the analysis of potential impacts “shall be limited to substantial, or potentially substantial, adverse changes in physical conditions” in the environment (Pub. Res. Code §21151(b); CEQA Guidelines §15358(b)). CEQA’s definition of the environment includes “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance” (Pub. Res. Code §21060.5). CEQA’s definition of the environment does not include economic or social effects (including psychological or social impacts on community character) unless those effects result in a change in the physical environment. The CEQA Guidelines are clear in emphasizing this point. Pursuant to CEQA Guidelines Section 15131, subdivision (a):

Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

Additionally, CEQA Guidelines Section 15064 states, “Economic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment.”

A potential change in property value is considered an economic concern. There is no evidence that potential changes in property values would result in physical changes on the environment. Therefore, CEQA does not require analysis of this issue. Additionally, projecting the magnitude of any decrease in property values, which would be affected by multiple factors, would require real estate market analysis and is beyond the scope of environmental review under CEQA.

As noted in Draft EIR Appendix A, *Scoping Report*, page A-27: “The EIR will be used to guide decision-making by the CPUC by providing an assessment of the potential environmental impacts that would result from the Project. The weighing of project benefits (environmental, economic, or otherwise) against adverse environmental effects is outside the scope of the EIR. When the CPUC considers whether to approve SCE’s application for the Project, it will consider the EIR along with economic and other considerations.” Thus, the Draft EIR does not address issues related to financial impacts or land values.

3.1.3 References

Southern California Edison (SCE), 2008. Frequently Asked Questions Presidential 66/16 Kilovolt Substation Project, October 2008.

SCE, 2012. Underground Structures Standards (UGS), 2012 — Second Quarter Issue. Available online: <http://www.sce.com/nrc/aboutsce/regulatory/distributionmanuals/ugs.pdf> (April 27, 2012)

3.2 Agencies and Organizations Responses

This section includes responses to all substantive comments received from agencies and organizations. Individual comments have been delineated and are followed by responses to each comment.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

June 12, 2018

CircleCityEIR@esassoc.com

Robert Peterson, Circle City Project
c/o Matthew Fagundes, Environmental Science Associates
1425 N. McDowell Blvd., Suite 200
Petaluma, CA 94954

**Draft Environmental Impact Report (Draft EIR) for the Proposed
Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project
(SCH No.: 2016021012)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

A1-1

SCAQMD Staff’s Summary of Project Description

The Lead Agency proposes to construct a 66/12 kilovolt (kV) substation, six underground 12 kV distribution getaways, four 66 kV subtransmission source lines, and a 10.9-mile 66 kV subtransmission line on 19.5 acres (Proposed Project). The Proposed Project would also relocate 1.9 miles of 33 kV distribution line and install telecommunication facilities. Construction of the Proposed Project is expected to take approximately 18 months¹.

A1-2

SCAQMD Staff’s Summary of Air Quality and Health Risk Assessment Analyses

In the Air Quality Analysis, the Lead Agency identified overlapping construction activities that were capable of contributing to the combined total estimated peak daily emissions². As shown in Table 4.3-4, *Project Peak Daily Construction Emissions*, construction emissions for each criteria pollutant from five Project components were combined. The five Project components were Circle City Substation, Mira Loma Substation, Source Lines, Mira Loma-Jefferson 66 kV Line, and Telecommunication Lines³. Subsequently, the Lead Agency compared the combined total construction emissions to SCAQMD air quality CEQA significance thresholds to determine the level of significance. Additionally, the Lead Agency conducted a health risk assessment (HRA) and found that the Proposed Project’s mitigated maximum individual cancer risk at the residential uses east of the Circle City Substation was 7.1 in a million, which would be below SCAQMD CEQA threshold of significance of 10 in a million for cancer risk.

A1-3

SCAQMD Staff’s Comments

Based on a review of HRA technical documentation, SCAQMD staff found that the mitigated maximum individual cancer risk of 7.1 in a million was calculated based on the annual emissions at one Project component (e.g., Circle City Substation). Since construction activities at the Circle City Substation would overlap with construction activities at the other four components, and to analyze the worst-case impact scenario, the Lead Agency should use the combined annual emissions from the overlapping construction activities to calculate the Proposed Project’s cancer risk in the Final EIR.

A1-4

¹ MND. Page 2-58.
² MND. Page 4.3-14.
³ MND. Page 4.3-15.

Robert Peterson
c/o Matthew Fagundes

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

A1-5

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov or Daniel Garcia, Program Supervisor, at dgarcia@aqmd.gov if you have any questions.

A1-6

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS/SW
RVC180606-02
Control Number

3.2.1 Letter A1 – Responses to Comments from South Coast Air Quality Management District

- A1-1 The CPUC has incorporated the SCAQMD’s comments into this Final EIR (see Letter A1, above) and has addressed each of the comments below.
- A1-2 The commenter’s summary of the proposed Project description is accurate; however, as a point of clarification, the Project is proposed by Southern California Edison (SCE), not the CPUC, which is the lead agency.
- A1-3 The commenter’s summary of the Draft EIR methods used to determine whether or not the Project could contribute substantially to an existing or projected air quality standard violation and to determine whether it could expose local sensitive receptors to harmful pollutant concentrations is accurate.
- A1-4 While the commenter asserts a “worst case analysis” should be provided, such an analysis is not required by CEQA. (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 373 [“[A]n EIR is not required to engage in speculation in order to analyze a ‘worst case scenario.’”].) CEQA provides for analysis of “reasonably foreseeable” impacts (see CEQA Guidelines § 15064(d).)

Although the criteria pollutant analysis did in fact combine total estimated peak emissions, that is because the criteria pollutant analysis is based upon regional emissions, not localized emissions (which are used in the health risk analysis). Unlike criteria pollutants, the health risk analysis (HRA) conducted for the Project is a much more localized analysis. The HRA was prepared based on the revised 2015 Office of Environmental Health and Hazard Assessment (OEHHA)’s guidance, which considers more conservative assumptions and updated scientific research than the previous guidance. Health risk impacts calculated in accordance with the OEHHA’s revised manual are approximately two to ten times higher than those calculated in accordance with the previous methodology. As stated in the HRA, the SCAQMD has not expressed support for or opposition to consideration of the OEHHA 2015 manual in evaluating construction impacts in CEQA documents. Rather, SCAQMD’s CEQA Air Quality Analysis Handbook calls for consideration of localized construction impacts in accordance with their Localized Significance Thresholds (LST) Manual. For the LST impact analysis associated with each component of the proposed Project, refer to Draft EIR Impact 4.3-4.

As noted in the second paragraph of the Draft EIR air quality Impact 4.3-7 discussion, “OEHHA does not recommend assessing cancer risk for projects lasting less than 2 months at the maximum exposed individual resident (MEIR).” As noted in the third paragraph of the same impact discussion regarding the linear project facilities such as the Mira Loma-Jefferson subtransmission line, the substation source lines, and telecommunication lines, “construction along these alignments

would proceed at a linear pace and would not be expected to expose any one receptor along the corridors for longer than 2 to 3 weeks.”

Although it is true that the regional criteria pollutant analysis did assume that many of the Project phases would overlap in schedule on the peak day of construction, as shown in Draft EIR Project description Table 2-8, *Proposed Construction Schedule*, construction of Circle City Substation, upgrades at Mira Loma Substation, and the undergrounding of the distribution line associated with the Mira Loma-Jefferson subtransmission line could overlap in schedule; while the subtransmission line construction (including the substation source lines and the Mira Loma-Jefferson subtransmission line), and construction associated with the telecommunication lines would occur starting in the third or fourth quarter of 2021, after construction of Circle City Substation is anticipated to be completed.

In addition, for the purposes of the HRA, construction activities at the substation site were modeled as a single volume source occupying 5 acres. With the exception of a few poles that would be associated with the proposed source lines and approximately 500 feet of underground telecommunication lines, the other Project components would not overlap in space to the extent that their construction-related toxic air compound (TAC) emissions would expose the same sensitive receptors.

Construction activities at Mira Loma Substation and associated with the southern end of the Mira Loma-Jefferson 66 kV line would be more than 9 miles and 2 miles from the Circle City Substation site, respectively. Although the sensitive receptor TAC exposure discussion in Draft EIR Impact 4.3-7 focuses on the effects of nearby residences due to construction of Circle City Substation because those construction activities would include the highest risk, the HRA conducted for the Project evaluates each component of the Project individually (see Draft EIR Appendix D.2, *Health Risk Assessment*).

Matthew Fagundes

From: chpsinfo@yahoo.com
Sent: Friday, June 15, 2018 3:49 PM
To: CircleCityEIR
Subject: Cultural Resources Technical Report

Good Afternoon,
The Corona Historic Preservation Society would like to request a copy of the Cultural Resources Technical Report.] A2-1

Thank you,

Corona Historic Preservation Society

3.2.2 Letter A2 – Responses to Comments from Corona Historic Preservation Society

- A2-1 The comment is a request for a copy of the Cultural Resources Technical Report prepared for the Project to be sent to the Corona Historic Preservation Society. The Cultural Resources Technical Report was provided to the Corona Historic Preservation Society the next business day via an electronic document transfer service. The Corona Historic Preservation Society acknowledged receipt of the report the same day (CHPS, 2018).

DEPARTMENT OF TRANSPORTATION
DISTRICT 8
PLANNING (MS 722)
464 WEST 4th STREET, 6th Floor
SAN BERNARDINO, CA 92401-1400
PHONE (909) 383-4557
FAX (909) 383-5936
TTY (909) 383-6300
www.dot.ca.gov/dist8



*Make Conservation
A California Way of Life.*

June 15, 2018

California Public Utilities Commission
Robert Peterson
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Mr. Peterson

Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project

We have received the Notice of Completion and Environmental Document for the above referenced project, located in the cities of Corona, Eastvale, Norco, Chino, Ontario, and unincorporated Riverside, and San Bernardino County. The project consists of the construction of a new 66/12 kV substation, four new 66 kV subtransmission source lines, which would be a combination of both overhead and underground construction.

A3-1

Your project does not appear to have impacts to the State Highway System. The California Department of Transportation has no comment at this time. However, we reserves the right to comment on any future revisions to this project. When development does occur a need for Encroachment Permits will be necessary for any work performed within the State right-of-way.

A3-2

We recommend that a Traffic Control Plan be put into for this proposed work. As you likely know RCTC is proceeding with a design-build that will add two tolled express lanes in each direction along this corridor that is currently under construction. This may or may not have an impact to your project. A planned traffic break for the protection of the public along the I-15 corridor for the proposed overhead route, relocation of existing overhead lines may be needed.

A3-3
A3-4

Encroachment Permit Requirements

Issuance of a Caltrans Encroachment Permit will be required prior to any construction within State R/W. In addition, all work undertaken within I-15 R/W shall be in compliance to all current design standards, applicable policies, and construction practices. Detailed information regarding permit application and submittal requirements is available at:

A3-5

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

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Mr. Peterson
June 15, 2018
Page 2

Should this proposal be later modified please forward copies of revised plans as necessary so that we may reevaluate all proposed changes for potential impact to State Highway System.] A3-5

Sincerely,



MARK ROBERTS, AICP
Office Chief
Intergovernmental Review, Community and Regional Planning

3.2.3 Letter A3 – Responses to Comments from California Department of Transportation

A3-1 The comment acknowledges receipt of the Notice of Preparation and Environmental Impact Report and provides a summary of the Project. No comment is necessary.

A3-2 The comment states that the Project would not appear to have impacts on the State Highway System; and therefore, the California Department of Transportation (Caltrans) has no comment at this time. Comment noted.

As discussed in Draft EIR transportation and traffic Impact 4.17-1, the need for SCE to obtain an encroachment permit for work performed within the State right-of-way is acknowledged.

A3-3 Per Draft EIR transportation and traffic Mitigation Measure 4.17-1, a Traffic Control Plan shall be prepared by SCE as part of any roadway encroachment permit.

A3-4 Consistent with the fourth paragraph of Draft EIR traffic and transportation Impact 4.17-1, it is acknowledged that a planned traffic break for the protection of the public along the Interstate 15 (I-15) corridor may be required for stringing of the proposed overhead line across I-15.

A3-5 If the proposed Project is modified by SCE to the extent that the changes would result in a new impact to the State Highway System, SCE would be provided with the new specifications accordingly.

Matthew Fagundes

From: Totton, Gayle@NAHC <Gayle.Totton@nahc.ca.gov>
Sent: Thursday, June 21, 2018 9:40 AM
To: CircleCityEIR
Cc: Blanchard, Billie C.
Subject: Minor text change in DEIR for Circle City Substation Project SCH# 2016021012

Good morning,

I left a voicemail message for Mr. Robert Peterson about a small correction in the environmental documents for the project referenced above. Since the document is substantially in compliance, I did not want to send a formal comments letter unless it is needed by the lead agency (the CPUC). I have not heard back from him and wanted to make the correction was made before issuing a final document.

Mitigation Measure 4.5-5 Huma Remains states that it is the responsibility of the project proponent, Southern California Edison, to contact the Native American Heritage Commission when remains are found and determined to Native by the County Coroner. California Health and Safety Code 7050.5 (c) specifically requires contact be made by the Coroner within 24 hours of determining the find to be (or potentially to be) Native American. The NAHC cannot move forward with designating a Most Likely Descendant until we are contacted by the County Coroner.

A4-1

Please let me know when that correction is made.

A4-2

Thank you,
Gayle

Gayle Totton, M.A., Ph.D.
Associate Governmental Program Analyst
Native American Heritage Commission
(916) 373-3714

3.2.4 Letter A4 – Responses to Comments from Native American Heritage Commission

A4-1 Based on comments received from Southern California Edison (SCE), Draft EIR cultural resources Mitigation Measure 4.5-1 has been revised to include the requirements for discovery of human remains that were previously identified in Draft EIR cultural resource Mitigation Measure 4.5-5. The discovery of human remains requirements in revised Mitigation Measure 4.5-1 has been updated to reflect NAHC concerns identified in this comment. Specifically, the text of this measure now states in part:

“If the county coroner determines that the remains are Native American, the county coroner shall contact the NAHC within 24 hours, in accordance with California Health and Safety Code Section 7050.5(c), and PRC Section 5097.98 (as amended by Assembly Bill 2641).”

Refer to Section 4.5, Cultural Resources in Final EIR Chapter 4, *Revisions to the Draft EIR*, for the fully revised Mitigation Measure 4.5-1.

A4-2 The suggested revisions to the Draft EIR have been made. Refer to responses to Comments A4-1, above, and A20-36 for the discovery of human remains requirements in revised Mitigation Measure 4.5-1.

Matthew Fagundes

From: David Peffer <peffer@braunlegal.com>
Sent: Thursday, June 21, 2018 12:27 PM
To: CircleCityEIR
Cc: Scott Blaising
Subject: Circle City - Question re: Alternative D1

Dear Circle City EIR Team,

I have a quick clarifying question regarding Alternative D1 as discussed in the Circle City Project Draft EIR. Although Alternative D1 eliminates the overhead source line running from the Circle City Substation site along Magnolia avenue, Figure 3-6 shows that under Alternative D1 an overhead telecommunications line would run along the same route. However, this appears to be contradicted by the discussion at pages 3-24 through 3-25, which appears to imply that the telecommunications line would be placed underground. Can you confirm whether or not the telecommunications line would be placed underground? If all or part of the telecom line would be placed above ground, would you mind identifying the section that would be placed above ground, and letting us know if it would use existing poles or would require the installation of new poles?

A5-1
A5-2

Thanks!

David Peffer
For: City of Corona

David Peffer | Attorney
Braun Blaising Smith Wynne, P.C.
915 L Street, Suite 1480, Sacramento, CA 95814
(916) 326-5812 (O)
(760) 715-0407 (C)
peffer@braunlegal.com | www.braunlegal.com



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3.2.5 Letter A5 – Responses to Comments from City of Corona (D. Peffer)

A5-1 The comment asks for clarification about whether or not the telecommunications line along Magnolia Avenue that would be associated with Alternative D1 would be placed underground. The *Telecommunication Connections* for Alternative D1 are shown Figure 3-3 in Draft EIR project alternatives Section 3.4.4.1, *Alternative D1: 12 kV Distribution–Level Battery Storage* are correct. The telecommunication line along Magnolia Avenue under Alternative D1 would be completely underground under Alternative D1, installed in existing and new conduits. Refer to Draft EIR Figure 3-3 for the illustration that shows where the new underground line would be installed and where the line would be installed within existing conduit. The key for Draft EIR Figure 3-6 that shows all the source line and substation alternatives contains a typographic error for Alternative D1 that indicates a portion of the line would be overhead.

In addition, subsequent to the release of the Draft EIR, SCE has clarified that an additional second telecommunications line to the Alternative D1 battery storage facility would be needed. For discussion of that line, including associated revisions to the Draft EIR text and Figure 3-6, refer to response to Comment A20-92 and Chapter 3, Project Alternatives, in Final EIR Chapter 4, *Revisions to the Draft EIR*.

A5-2 All parts of the telecommunication line along Magnolia Avenue under Alternative D1 would be completely underground. Refer to response to Comment A5-1.

Matthew Fagundes

From: Fossum, Larry (TRBL) <lfoosum@aguacaliente.net>
Sent: Tuesday, July 3, 2018 10:45 AM
To: CircleCityEIR
Subject: A.15-12-007 Project

Dear Robert:

A records check of the Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to other tribes in the area. This letter shall conclude our consultation efforts.

]

A6-1

Cordially,

Larry Fossum
On behalf of Patricia Garcia-Plotkin
Director of Historic Preservation
Agua Caliente Band of Cahuilla Indians

The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer

3.2.6 Letter A6 – Responses to Comments from Agua Caliente Band of Cahuilla Indians

- A6-1 The comment indicates that the Project area is not within the Agua Caliente Band of Cahuilla Indians' Traditional Use Area, and that the letter concludes their consultation efforts. Comment noted.



July 10, 2018

Mr. Robert Peterson
Circle City Project
c/o Mattew Fagundes, Environmental Science Associates
1425 N. McDowell Blvd, Ste 200
Petaluma, CA 94954
Phone: (707) 795-0926
CircleCityEIR@esassoc.com

Subject: Comments on the Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project Draft EIR Prepared for the California Public Utilities Commission (SCH No. 2016021012)

Dear Mr. Peterson:

The City of Eastvale appreciates the opportunity to comment on the above referenced Environmental Impact Report (EIR). The City understands that Southern California Edison (SCE) is proposing to upgrade the region’s existing electrical infrastructure and improve overall electrical reliability in the identified electrical needs area to be served by northwestern Riverside County area, including the cities of Corona, Norco, the surrounding area of unincorporated Riverside County, and the City of Eastvale.

A7-1

The City of Eastvale has previously provided correspondence to the California Public Utilities Commission (CPUC) expressing support for the underground of transmission lines. We agree that the Draft EIR correctly determines that the impacts of the proposed above-ground transmission line would be significant, and would adversely impact public views in the City of Eastvale. The City continues to support the underground of transmission lines as a viable option for avoiding significant aesthetic impacts such as described for Alternative C1, or as mitigation to the proposed project.

A7-2
A7-3

In addition, we note that Eastvale residents also overwhelmingly support the undergrounding of transmission lines for this project. At the project meeting held on July 28, 2018 at the Eastvale Community Center, concerned community members of Eastvale and Norco expressed their preference for the underground option. The local citizens overwhelming concerns were the aesthetic impacts of the above ground powerlines, property value decline due to added visual congestion, noise from the above ground power poles and safety concerns regarding the increased potential for human and animal electrocution caused by downed powerlines. Undergrounding the power transmission lines and poles would eliminate these concerns.

A7-4

The City has the following specific comments for consideration by Southern California Edison and the Public Utilities Commission on the proposed Project.



12363 Limonite Avenue, Suite #910 • Eastvale, CA 91752
(951) 361-0900 • Fax: (951) 361-0888 • www.EastvaleCA.gov

- **Aesthetics:** The City is opposed to the project as proposed and is specifically concerned about the addition of power poles and overhead conductors along the east side of Hellman Avenue beginning at the southwest corner of American Heroes Park continuing south within Hellman Avenue to Pine Avenue/Schleisman Road, where they currently do not exist. This portion of the project currently has existing power pole facilities along the west side of Hellman Avenue, which impact the scenic vista and visual character of this area. The additional 8 LWS poles and 3 TSPs proposed along the east side of Hellman Avenue will exacerbate an already existing significant visual impact to Eastvale and the surrounding area.

A7-5

Alternative C1, *Underground 66 kV Subtransmission Line along Hellman Avenue*, would be a better solution, reducing visual impacts in the city of Eastvale. Undergrounding the power pole facilities would be more harmonized with the Project Objective to “meet the proposed project need while minimizing environmental impacts.” Further, Alternative C1 has been determined to be the Environmentally Superior Alternative for the subtransmission service objective.

A7-6

The City would ultimately like to see the existing transmission poles along Hellman Avenue removed and replaced with all underground facilities. At minimum, the City requests that Alternative C1 be incorporated as part of the proposed project.

A7-7

- **Safety/Hazards:** The City appreciates the discussion included in the Hazards and Hazardous Materials Section of the EIR that analyzes fire and electrical shock risks. As stated in the Alternatives portion of the Hazards and Hazardous Materials section, risk from fire or electrical shock is eliminated in this segment of the project if the project would underground a portion of the alignment along Hellman Avenue that is discussed in Alternative C1. For these reasons, the City supports Alternative C1, as it would eliminate potential fire and electrical shock risks along this segment of the proposed project.

A7-8

- **Underground Alternative:** The City appreciates the inclusion of underground alternatives for the proposed project (Alternative C1 and Alternative C2). The City would prefer that SCE underground all segments of the proposed project along roadways and residential areas and not replace the existing poles with new taller power poles.

A7-9

- **Biological Resources:** The City appreciates the discussion of migratory birds and potential mortality impacts due to the powerline collision hazards. The EIR states that no mitigation is required. Even though SCE will use APLIC “avian-safe” power poles, the City is concerned that collision impacts will occur to special status bird species because the new poles will be taller than the poles that will be replaced. Due to these impacts, the City recommends that SCE undertake Alternative C1 to at least reduce these impacts along this portion of the project alignment.

A7-10

The City of Eastvale appreciates the opportunity to comment on the project. If you have any questions, please contact the Planning Director, Eric Norris at Enorris@eastvaleca.gov or 951-703-4460.



12363 Limonite Avenue, Suite #910 • Eastvale, CA 91752
(951) 361-0900 • Fax: (951) 361-0888 • www.EastvaleCA.gov

Sincerely,

Bryan Jones, PE, AICP
Interim City Manager

cc: Eric Norris, Planning Director
Joe Indrawan, City Engineer

City Manager, City of Norco
City Manager, City of Jurupa Valley

3.2.7 Letter A7 – Responses to Comments from City of Eastvale (B. Jones)

- A7-1 The comment expresses appreciation for the opportunity to comment on the Draft EIR and provides a brief summary of the Project; no response required.
- A7-2 The comment expresses support for undergrounding of transmission lines, and agrees with the Draft EIR’s determination that [some] impacts of the proposed above-ground transmission lines would be significant. This comment does not address the adequacy of the Draft EIR, therefore no further response is required.
- A7-3 The comment supports undergrounding as an option for avoiding significant Project aesthetic impacts, such as described in Alternative C1 or as mitigation. This comment does not address the adequacy of the Draft EIR. The decision to approve the proposed Project or an alternative will be considered by the decisionmakers before they make a final decision on SCE’s application.
- A7-4 The comment expresses public support for undergrounding of transmission lines due to aesthetic impacts, property value decline, noise, and safety concerns regarding electrocution hazards.

The Draft EIR concluded that the overall visual impact of the Project in the City of Eastvale would be significant along the segment of Hellman Avenue in the City of Eastvale, and would be less than significant in other portions of the City (see the fifth, sixth, seventh, and eighth paragraphs of the *Mira Loma-Jefferson 66 kV Subtransmission Line* discussion of Draft EIR aesthetics Impact 4.1-3). The significant aesthetic impact would be avoided with implementation of Alternative C1, which would result in that segment of the line being undergrounded. The Draft EIR does not introduce undergrounding mitigation or alternatives for the other subtransmission line segments in City of Eastvale because associated significant aesthetics impacts have not been identified. Also refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

For discussion of potential Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.

The long-term noise impacts that would be associated with subtransmission line corona noise and maintenance activity would be less than significant. The Draft EIR does not introduce undergrounding the line as mitigation or an alternative to reduce noise impacts associated with the Mira Loma-Jefferson subtransmission line because significant noise impacts have not been identified. Also refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

As presented in the Draft EIR hazards and hazardous materials Impact 4.9-7 discussion, SCE would be required to follow State vegetation and tree clearing

requirements, including CPUC General Order 95 and PRC Section 4293, which require that certain vegetation management activities be performed and maintained for overhead conductors that traverse trees and vegetation under normal conditions so that contact is not made with conductors to avoid ignition of a fire, which also serves to protect the integrity of the conductors. In addition, both distribution and subtransmission systems are designed to withstand high winds, and it is extremely rare for higher-voltage transmission structures to blow over. If this rare event does occur, the protection system on a subtransmission line is designed to shut off power flow in a fraction of a second. The potential for the Project to cause human or animal electrification is extremely low.

Impacts related to potential small electrical shocks would be reduced to less-than-significant through implementation of hazards and hazardous materials Mitigation Measure 4.9-8 (see Draft EIR hazards and hazardous materials Impact 4.9-8). There is no basis to underground the proposed subtransmission line due to risk of electrocution and/or shock. Also refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

- A7-5 The commenter states “This portion of the project currently has existing power pole facilities along the west side of Hellman Avenue, which impact the scenic vista and visual character of this area.” Existing environmental issues are not impacts of the proposed Project. (*Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059 [“The FEIR was not required to resolve the [existing] overdraft problem, a feat that was far beyond its scope”].) The comment correctly identifies a significant aesthetic Project impact along Hellman Avenue that is described in Draft EIR aesthetics Impact 4.1-3. The commenter does not address the adequacy of the Draft EIR, therefore no further response is required.
- A7-6 The comment expresses support for Alternative C1. The decision to approve the proposed Project or an alternative will be subsequently considered by the decisionmakers. The commenter does not address the adequacy of the Draft EIR, therefore no further response is required.
- A7-7 The commenter states the City of Eastvale prefers that existing poles along Hellman Avenue be removed and be replaced with underground facilities, or at a minimum Alternative C1 should be implemented. Comment noted.
- A7-8 Potential health and safety impacts of the proposed Project are discussed in Draft EIR Section 4.9, *Hazards and Hazardous Materials*. As discussed under Impact 4.9-7, the operation of the proposed subtransmission lines would have a less-than-significant effect regarding the probability of causing a wildfire. Draft EIR hazards and hazardous materials Impact 4.9-8, related to potential small electrical shocks, would be reduced to less-than-significant levels through implementation of Mitigation Measure 4.9-8. The comment correctly notes that

Alternative C1 would eliminate risk from fire or electrical shock along the Hellman Avenue segment of the Project within the City of Eastvale.

- A7-9 The comment expresses the preference for undergrounding all segments of the proposed Project along roadways and residential areas. Also see Master Response 1: Underground versus Overhead Subtransmission Lines.
- A7-10 The commenter asserts that collision impacts would increase “because the new poles will be taller,” however, there is no correlation between the increased height of the poles and avian collision impacts. As stated in the Draft EIR biological resources Impact 4.4-9 discussion, SCE currently designs power poles and power lines to comply with Edison Electric Institute’s Avian Power Line Interaction Committee (APLIC) “avian-safe” standards. Construction of the proposed Mira Loma-Jefferson subtransmission line would result in the replacement of old standard design power poles and lines with APLIC-compliant structures that would reduce the potential for bird electrocution and collision hazards and result in beneficial effects for bird species, including special status bird species, relative to existing conditions. In general, the use of APLIC pole design standards reduces the potential impact of collision and electrocution hazards for avian species to less than significant level, with no additional required mitigation. Although the proposed APLIC-compliant poles along the Mira Loma-Jefferson subtransmission line Hellman Avenue segment in City of Eastvale would result in a less-than-significant impact associated with bird collisions and/or electrocution, the commenter is correct to note that implementation of Alternative C1 would reduce the overall impact.

Matthew Fagundes

From: Bryan Jones <bjones@eastvaleca.gov>
Sent: Thursday, July 12, 2018 6:03 PM
To: CircleCityEIR
Cc: Joe Indrawan; Eric Norris; Erica Vega; Clint Lorimore; aokoro@ci.norco.ca.us; gthompson@jurupavalley.org; Mark Cloud
Subject: Circle City Underground - City of Eastvale Comments on DRAFT EIR
Attachments: Eastvale Comment Letter Circle City Project 7-10-18.pdf; Mayor Letter-CIRCLE CITY SUBSTATION AND MIRA LOMA-JEFFERSON 66 kV SUBTRANSMISSION LINE PROJECT.PDF; Resolution 16-06.pdf

Dear Robert Peterson,

Please find attached a letter from the City of Eastvale supporting the environmentally superior alternative of underground power lines for the Circle City project. Additionally I have attached a previous letter as well as a resolution from past comment periods. As you can see, we remain consistent with our requests. Should you have any questions please do not hesitate to let me know.

A8-1

Please confirm receipt of this email and the attachments.

Sincerely,

Bryan

Bryan Jones, PE, AICP

Interim City Manager
City of Eastvale
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Please note, City Hall is closed on Fridays

Please note that email correspondence with the City of Eastvale, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt.



December 15, 2015

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**RE: CIRCLE CITY SUBSTATION AND MIRA LOMA-JEFFERSON 66 kV
SUBTRANSMISSION LINE PROJECT**

Dear California Public Utilities Commission,

On behalf of the Eastvale City Council, this letter informs Southern California Edison (SCE) and the California Public Utilities Commission (CPUC) of the City's support for undergrounding of the Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project. Energy reliability is a very important issue in our area.

The Circle City Project will upgrade the region's existing electrical infrastructure and improve overall electrical reliability in the Northwestern Riverside County region. As you know, our City has experienced tremendous growth within the past five years, and growth projections for both residential and the business community continue grow. Projects such as this ensure that electricity is readily available and reliable in the future. This project addresses the increasing electricity needs for our residents and businesses.

The City understands that SCE must submit both a proposed route and alternative route to the CPUC. For reasons of efficiency and over all aesthetics, we request that SCE underground the 66 kV subtransmission line along Hellman Avenue, River Road, Baron Drive and Archibald Avenue rather than installing overhead line. With that said, the City of Eastvale is a proponent of undergrounding the full length of the Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line electrical infrastructure within our city boundaries. There is an existing overhead 66kV line along Hellman Avenue in the City of Chino. Placing an additional parallel line along Hellman Avenue in the City of Eastvale will create pole pollution which is not aesthetically pleasing. Overhead power lines are visually unsightly and will negatively impact the overall appearance of our City. We hope that SCE and the CPUC consider this input.

A8-2

The City of Eastvale appreciates working with SCE on the proposed project. We are encouraging our citizens to engage SCE and the CPUC to express their opinion on this matter.

Sincerely,

Ike Bootsma
Mayor
City of Eastvale

CC: Southern California Edison

RESOLUTION NO. 16-06

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EASTVALE DECLARING OPPOSITION TO INSTALLATION OF NEW POLES AND NEW OVERHEAD 66kV SUBTRANSMISSION POWER LINE BY SOUTHERN CALIFORNIA EDISON (SCE) – CIRCLE CITY SUBSTATION AND MIRA LOMA-JEFFERSON 66kV SUBTRANSMISSION LINE PROJECT (A.15-12-007)

WHEREAS, the Southern California Edison (SCE) on December 4, 2015, has sought a permit from the California Public Utilities Commission (CPUC) to construct the Circle City Substation and Mira Loma-Jefferson 66 kilovolt (kV) Subtransmission Line Project (Project); and

WHEREAS, the CPUC will prepare an Environmental Impact Report (EIR), pursuant to the California Environmental Quality Act (CEQA); and

WHEREAS, the CPUC will receive public comments between January 29 and February 29, 2016 on the scope issues and alternatives to be evaluated in the EIR; and

WHEREAS, the Project would be located in portions of the City of Eastvale (Eastvale); and

WHEREAS, approximately more than twenty and less than thirty new subtransmission poles (Poles) will be installed to hang and/or carry a 66kV subtransmission line (Line) across Eastvale; and

WHEREAS, the areas affected by these Poles and Line include developed and/or to be developed residential, commercial and industrial zoned areas; and

WHEREAS, the impact(s) of these Poles and Line would be detrimental to health, safety and property values; and

WHEREAS, SCE has failed to meaningfully inform Eastvale and obtain necessary input; and

THEREFORE, BE IT RESOLVED that the City Council of the City of Eastvale formally opposes any installation of New Poles and New Overhead 66 kV Subtransmission Line within the City of Eastvale boundaries.

PASSED, APPROVED AND ADOPTED this 29th day of February, 2016, by the following vote:

AYES: Councilmembers: Link and Lorimore, Mayor Pro Tem Tessari and Mayor Bootsma
NOES: none
ABSTAIN:
Absent: Councilmember Rush

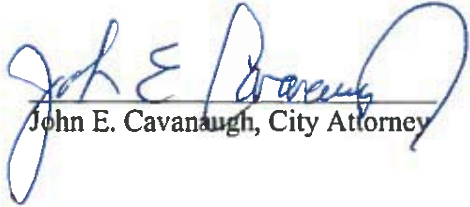
A8-2
cont.

ABSENT: Council member Rush



Ike Bootsma, Mayor

APPROVED AS TO FORM:



John E. Cavanaugh, City Attorney

ATTEST:



Margo Wuehce, Recording Secretary

3.2.8 Letter A8 – Responses to Comments from City of Eastvale (B. Jones and I. Bootsma)

- A8-1 The comment is the electronic transmittal for the City of Eastvale’s Draft EIR comment letter (see Comment Letter A7) and a previous letter about the Project sent to the CPUC by the City of Eastvale in 2015 before the release of the Notice of Preparation (see Comment A8-2).
- A8-2 The City of Eastvale letter does not address the adequacy or accuracy of the Draft EIR; however, the City Council Resolution declaring opposition to the Project is acknowledged. Refer to responses to Comment Letter A7 for responses to the City of Eastvale’s Draft EIR comments.

JASON E. UHLEY
General Manager-Chief Engineer



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www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

July 17, 2018

Mr. Robert Peterson
Circle City Project
c/o Matthew Fagundes
Environmental Science Associates
1425 N. McDowell Boulevard, Suite 200
Petaluma, CA 94954

Dear Mr. Peterson:

Re: Notice of Availability of a Draft
Environmental Impact Report (DEIR) for
the Circle City Substation and Mira Loma-
Jefferson Subtransmission Line Project

This letter is written in response to the Notice of Availability of a DEIR prepared by the California Public Utilities Commission (CPUC) for the Southern California Edison (SCE) proposed Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (Project). The Project proponent (SCE) requests authorization to construct a new 66/12 kV substation (Circle City Substation) located approximately 0.25 mile south of the corner of Magnolia Avenue and East 6th Street in Corona, and up to six new underground 12 kV distribution gateways that would exit the new substation. SCE would also require authorization to construct four new 66 kV subtransmission source lines, and a new 66 kV subtransmission line in a combination of both overhead and underground installations.

A9-1

The District has reviewed the DEIR and has the following comment:

Any work that involves existing District rights of way, easements, or facilities will require an encroachment permit from the District. Therefore, the District may be a CEQA Responsible Agency and may need to be named as such in the DEIR if the proposed SCE facilities will involve District facilities. To facilitate the encroachment permit process, any potential environmental impacts associated with the Project improvements within District facilities should be addressed in the DEIR. Further information on encroachment permits can be obtained at <http://www.rcflood.org/EncroachmentPermits.aspx>.

A9-2

Thank you for the opportunity to review the DEIR. Please forward any subsequent environmental documents regarding the Project to my attention at this office. Any questions concerning this letter may be referred to Bailey Bingham at 951.955.3134 (bbingham@rivco.org) or me at 951.955.1306 (rsheppea@rivco.org).

A9-3

Very truly yours,

RANDY SHEPPEARD
Senior Flood Control Planner

ec: Kamyar Ghods

BNB:mcv
P8\221740

3.2.9 Letter A9 – Responses to Comments from Riverside Flood Control and Water Conservation District

- A9-1 The comment summarizes the Project description. This comment does not address the adequacy or accuracy of the Draft EIR; no response is necessary.
- A9-2 The comment states that any work that involves existing Riverside County Flood Control and Water Conservation District (RC Flood Control District) rights-of-way, easements, or facilities will require an encroachment permit from the RC Flood Control District, and could result in the Flood Control District being a CEQA Responsible Agency for the Project. The Draft EIR acknowledges that an RC Flood Control District Encroachment Permit may be required for the Project (see Draft EIR introduction Table 1-2, Summary of Potential Permit Requirements). This description is consistent with CEQA Guidelines Section 15124(d).

The comment also states that “any potential environmental impacts associated with the Project improvements within District facilities should be addressed in the DEIR.” The Draft EIR evaluates potential environmental impacts of the whole of the Project in Chapters 4, *Environmental Analysis*; 6, *Cumulative Effects*; and 7, *Other CEQA Considerations*. Impacts related to hydrology and water quality, including flood inundation and erosion and sedimentation patterns, are evaluated in Draft EIR Section 4.10, *Hydrology and Water Quality*.

- A9-3 This comment requests that subsequent environmental documents should be forwarded to the RC Flood Control District office, and identifies a RC Flood Control District contact for further questions. The RC Flood Control District contact has been added to the Final EIR mailing list.



Gabrieleno Band of Mission Indians – Kizh Nation

Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

July 17, 2018

Regarding: Circle City Substation and Mira Loma – Jefferson Subtransmission Line Project

Dear Mr. Robert Peterson,

This email is in response to the above referenced project located portions of northwestern Riverside County, Corona, Eastvale , and Norco, and portions of San Bernardino. The project location is within our Ancestral territory which may have potential for discoveries of our cultural resources . Therefore, we would like to request that one of our Native Monitors be present during any and all ground disturbances.

A10-1
A10-2

Should you have any questions or concerns, please contact our office at 844-390-0787.

Thank you,

Andrew Salas
Chairman, Gabrieleno Band of Mission Indians-Kizh Nation

3.2.10 Letter A10 – Responses to Comments from the Gabrieleno Band of Mission Indians

- A10-1 It is noted that the Project Area is within the Gabrieleno Band of Mission Indians’ ancestral territory. The commenter was included in Project-related Native American consultation efforts related to compliance with Assembly Bill 52.
- A10-2 Mitigation Measure 4.5-2 already provides for the applicant to “cease all construction activity within 100 feet of the find and flag off the area for avoidance.” This measure also includes review of any materials by a qualified archaeologist, and consultation with Native American tribes. However, no tribal monitoring has been specifically proposed as a mitigation measure due to low potential to encounter undisturbed indigenous archaeological deposits. This low potential is due to the Project Area having been heavily disturbed by historical and modern activities, notably road construction, urban and industrial development, dairy farming, crop cultivation, and railroad activities (see *Archaeological Sensitivity* discussion in Draft EIR cultural resources Section 4.5.2.2, *Cultural Resources Setting*). However, Draft EIR Mitigation Measure 4.5-1 has been revised to require development of a Cultural Resources Management Plan (CRMP) for the proposed Project. Development of the CRMP would result in a requirement to conduct archaeological monitoring for the proposed Project within designated areas of moderate potential for archaeological resources that are in previously undisturbed sediment (Refer to Section 4.5, Cultural Resources in Final EIR Chapter 4, *Revisions to the Draft EIR*, for the fully revised Mitigation Measure 4.5-1).

CIRCLE CITY SUBSTATION TASK FORCE

July 18, 2018

Via E-Mail (CircleCityEIR@esassoc.com)

Rob Peterson
California Public Utilities Commission
c/o Matt Fagundes
Environmental Science Associates
1425 N. McDowell Boulevard, Suite 200
Petaluma, CA 94954

Subject: Opening Comments of CCSTF On The Draft Environmental Impact Report For The Circle City Project (Application 15-12-007)

Dear Mr. Peterson:

The Circle City Substation Task Force (“CCSTF”) hereby submits the following comments on the Draft Environmental Impact Report (“DEIR”) for Southern California Edison’s (“SCE”) proposed Circle City Project (“CCP”).

INTRODUCTION

CCSTF is a group of concerned citizens and businesses which was formed to provide a direct voice for the Corona residents and businesses that would be directly impacted by the proposed CCP. CCSTF and its members have a direct interest in ensuring that Corona residents are not subjected to unreasonable environmental impacts from the CCP. Pursuant to this interest, CCSTF offers three principal comments on the Draft EIR: 1) CCSTF strongly supports the DEIR’s selection of Alternative D1, which would replace the proposed Circle City Substation with a battery storage facility and would eliminate the Pedley and Databank Source Lines; 2) CCSTF requests that the Mira-Loma Jefferson Subtransmission Line along River Road be placed underground to eliminate significant aesthetic impacts; and 3) CCSTF requests that the DEIR be amended to directly address environmental justice issues.

A11-1
A11-2
A11-3
A11-4

COMMENTS ON THE DEIR

1. CCSTF Strongly Supports The DEIR’s Selection of Alternative D1

CCSTF strongly supports the DEIR’s identification of Alternative D1 as the environmentally superior alternative. Alternative D1 replaces the Circle City Substation with a significantly less impactful battery facility, and eliminates the highly disruptive Pedley and Databank Source Lines. CCSTF is strongly in favor of both of these changes to the proposed project.

A11-5

Rob Peterson, CPUC
c/o Matt Fagundes
Environmental Science Associates
July 18, 2018
Page 2 of 4

Replacing the Circle City Substation with a battery facility potentially offers significantly reduced aesthetic impacts compared to the proposed Circle City Substation. Compared to the proposed Circle City Substation, the battery facility would occupy a significantly smaller footprint, and would have a considerably lower maximum height. With adequate mitigation measures (including obscuring walls and vegetation), the smaller battery facility would be significantly less visible from Magnolia Avenue (a high-traffic thoroughfare), Lesson Way, and neighboring businesses.

A11-6

Replacing the Circle City Substation with battery storage also has the potential to produce additional environmental and economic benefits. Corona has an ideal climate for solar generation, and Corona has experienced steady growth of rooftop solar adoption. As a general matter, battery storage is an important tool for making sure that the energy produced by variable-availability renewable resources like solar is available when it is needed to serve actual load. CCSTF views energy storage as an essential element of the region’s move towards an increasingly electrified, renewables-powered economy.

A11-7

CCSTF also strongly supports the Alternative D1’s elimination of the highly disruptive proposed Pedley and Databank Source Lines. The construction of these lines would cause significant noise, traffic, and air quality impacts. These construction impacts would cause significant gridlock in key transportation corridors within Corona. The Source Lines would cause permanent and significant aesthetic impacts in residential neighborhoods, including low-income and disadvantaged neighborhoods, would be visible from a major municipal park, would span the Interstate 15 spoiling the view of the City of Corona and the Santa Ana Mountains for the tens of thousands of motorists who travel that freeway every day, and would have negative aesthetic impacts in important industrial neighborhoods that are major drivers of the region’s economy. Alternative D1 eliminates all of these significant and unavoidable impacts.

A11-8

A11-9

A11-10

2. The DEIR Should Require The Undergrounding Of The Mira-Loma Jefferson Subtransmission Line Along River Road

Although CCSTF is highly encouraged by the DEIR’s selection of Alternative D1 to meet the CCP’s distribution service objective, CCSTF is disappointed by the selection of Alternative C1 to meet the CCP’s subtransmission service objective. As it impacts Corona residents, the version of the Mira Loma-Jefferson Subtransmission Line that would be constructed under Alternative C1 is identical to the version that would have been constructed under SCE’s original proposal.

A11-11

Under alternative C1, 61 existing wood poles located along River Road would be replaced with 61 significantly taller lightweight steel poles. The new Mira Loma-Jefferson Subtransmission Line would be installed on these poles.

In electing to replace an existing overhead line with a significantly larger line and poles, the DEIR misses a significant opportunity to improve the aesthetic character of River Road, and the surrounding schools, parks, and residential neighborhoods. The CCP proposal offers an ideal

A11-12

Rob Peterson, CPUC
c/o Matt Fagundes
Environmental Science Associates
July 18, 2018
Page 3 of 4

opportunity to underground both the existing lines and the proposed Mira Loma-Jefferson Subtransmission Line.

↑ A11-12
| cont.

The DEIR's concludes that because wood poles are already installed along River Road, replacing these poles with lightweight steel poles would not have a significant aesthetic impact. CCSTF disagrees. The lightweight steel poles would be considerably taller and would carry more lines than the existing wood poles, and thus would dominate the visual landscape significantly more than existing poles. The increased size and number of lines associated with the new poles would also make the new line visible from greater distances, increasing the overall footprint of the project's negative aesthetic impact. Although, as the DEIR points out, the new steel poles would be painted grey while the exiting wood poles are brown, the new poles will still be significantly more visible than the existing wood poles. Painting a large pole grey does not make it disappear into the landscape as the project mock up photos would appear to suggest.

A11-13

A11-14

A11-15

3. The DEIR Improperly Dismisses Important Environmental Justice Issues

As the DEIR notes, in the CCP EIR Process, the Commission has received two letters raising environmental justice issues related to the CCP proposal. The DEIR acknowledges these concerns, but concludes that:

...letters received on the Project indicate a concern about visual impacts on residential neighborhoods that may affect property values and residents' experience of the streetscape. The CPUC acknowledges these concerns. As described above, the CEQA Guidelines state that "Economic or social effects of a project shall not be treated as significant effects on the environment" and "Economic or social effects of a project may be used to determine the significance of physical changes caused by the project." However, CEQA analyses of visual (aesthetic) impacts focus on effects on public views, not private views. Therefore, potential economic or social effects of Project siting resulting from changes in private views (e.g., changes in residential property values) are not environmental impacts that must be considered in the scope of this EIR. Nonetheless, the comments received on this topic are part of the record for this Project and will be considered along with the EIR at the decision-making stage of this project.

A11-16

The selection of Alternative D1 renders moot the environmental justice concerns associated with the Pedley and Databank Source Lines. However, CCSTF believes that significant valid environmental justice issues remain with regard to the section of the Mira-Loma Jefferson Subtransmission Line that would be constructed along River Road.

Even with the DEIR's identification of Alternative D1 as the environmentally superior alternative, the CCSTF believes that the environmental justice impacts on the neighborhood that would be most impacted by the Pedley and Databank Source Lines should be thoroughly considered by the CPUC. The CCSTF members solicited direct input from this neighborhood.

Rob Peterson, CPUC
c/o Matt Fagundes
Environmental Science Associates
July 18, 2018
Page 4 of 4

The task force members created an educational flyer detailing the project in Spanish and English, and we canvassed the neighborhood four separate times totaling 20 hours of walking. Using the flyer and Spanish speaking volunteers, we attempted to educate the predominantly Spanish speaking neighborhood.

In our efforts to gain feedback to the CPUC, we found two things. One that the residents did not know or understand the project and two that they were fearful to write letters on their own behalf. To dismiss the environmental justice aspects of the project is to dismiss the burden placed on a lower-income, predominantly Spanish speaking neighborhood with homeowners and renters who care deeply about their neighborhood and quality of life.

A11-17

CONCLUSION

The CCSTF thanks the Commission for its consideration of the matters raised in these comments, and respectfully requests that the above-requested modifications be included in the Commission's Final EIR.

A11-18

**RESPECTFULLY SUBMITTED
ON BEHALF OF THE
CIRCLE CITY SUBSTATION TASK FORCE**

DocuSigned by:
Michele Wentworth
CEEF4A35B9684D8...
Michele Wentworth, M.P.A., M.S.G.

DocuSigned by:
Patricia Anderson
16649E853BAB4CC...
Patricia Anderson

DocuSigned by:
Wes Speake
0A2CBCCD695F40B...
Wes Speake

3.2.11 Letter A11 – Responses to Comments from Circle City Substation Task Force

- A11-1 The comment introduces the Circle City Substation Task Force, which is a group of concerned citizens and businesses; no response required.
- A11-2 The comment expresses support for Draft EIR Alternative D1; no response required.
- A11-3 The comment requests that the Mira-Loma Jefferson Subtransmission Line along River Road be undergrounded. See responses to Comments A11-11 through A11-15, below.
- A11-4 The comment requests the Draft EIR be revised to directly address environmental justice issues. An analysis of “Environmental Justice” is typically based upon analysis of impacts to low-income and minority populations. CEQA Guidelines Section 15131 explains that it is not the purpose of CEQA to analyze social and economic considerations. Furthermore, the Draft EIR made reasonable assumptions regarding the regarding sensitive receptors in the HRA analysis. See also Response to Comment A11-16, below.
- A11-5 The comment expresses support for Alternative D1; no response required.
- A11-6 As discussed in the Circle City discussion in Draft EIR aesthetics Impact 4.1-3, the impact regarding visual character and quality of the proposed Circle City Substation would be less than significant. Similarly, Alternative D1 would result in a less-than-significant impact; therefore, potential mitigation measures suggested in the comment (e.g., walls and vegetation) would not be required to reduce or avoid a significant impact. However, subsequent to the release of the Draft EIR, SCE has stated that in the event that Alternative D1 would be part of the approved project, it would construct a minimum 8-foot-tall, tan-colored wall around the battery storage facility similar to that SCE proposed for the Circle City Substation site.
- Also refer to response to Comment A16-20.
- A11-7 The comment expresses support for the battery storage option described in Draft EIR Alternative D1; no response required.
- A11-8 The comment expresses support for Alternative D1’s elimination of the proposed Pedley and Databank Source Lines. The comment also asserts “The construction of these lines would cause significant noise, traffic, and air quality impacts. These construction impacts would cause significant gridlock in key transportation corridors within Corona.”

Draft EIR Sections 4.3 and 4.13 disclosed significant and unavoidable impacts for air quality and noise impacts associated with the Project’s construction activities.

However, as discussed in Draft EIR Section 4.17, construction traffic impacts were considered to be less than significant with mitigation incorporated.

- A11-9 The Draft EIR disclosed significant and unavoidable aesthetic impacts that would be associated with the proposed Pedley and Databank source lines described in the *Source Lines* discussion of Draft EIR aesthetics Impact 4.1-3. No response required.
- A11-10 The comment correctly notes that Alternative D1 would eliminate the significant aesthetic impacts associated with construction of the proposed Pedley and Databank Source Lines. No response required.
- A11-11 The comment expresses disappointment in the Draft EIR’s selection of Alternative C1 to meet the subtransmission service objective. To clarify, Alternative C1 has been selected as the environmentally superior alternative for the subtransmission service objective. The ultimate approval or rejection of an alternative, set of alternatives, or the Project will be decided by the Commission during the Formal Proceeding process for Application A.15-12-007.

The comment correctly notes that Alternative C1 is identical to the proposed Project regarding the portion of the proposed Mira Loma-Jefferson Subtransmission Line that would be located within the City of Corona.

- A11-12 The comment states that the proposed Project presents an opportunity to underground both the existing line along River Road as well as the proposed Mira Loma-Jefferson line. This suggestion is noted, but it is not part of the proposed Project. Also see Master Response 1: Underground versus Overhead Subtransmission Lines.
- A11-13 The comment expresses disagreement with the Draft EIR’s less-than-significant conclusion regarding aesthetic impacts of the proposed Mira Loma-Jefferson line along River Road. Although it is true that the new poles would be taller than the existing poles, contrary to the commenter’s suggestion, the new poles would carry the same number of lines as the existing poles because the existing 33 kV lines would be installed underground as part of the Project to accommodate the proposed Mira Loma-Jefferson subtransmission line. Both existing and new poles include, or would include, a double-circuit configuration with underbuilt distribution and telephone lines. The Mira Loma-Jefferson 66 kV Subtransmission Line discussion in Draft EIR aesthetics Impact 4.1-3, acknowledges these changes, but concludes that they would not result in a substantial degradation and would therefore not result in a significant impact. This approach is consistent with CEQA. (See *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 899 [“A less than significant impact does not necessarily mean no impact at all.”].)
- A11-14 Refer to response to Comment A11-13.

A11-15 The Draft EIR does not suggest that the proposed poles along River Road would disappear into the landscape; however, as noted in the fourth paragraph of the *Mira Loma-Jefferson 66 kV Subtransmission Line* discussion of Draft EIR aesthetics Impact 4.1-3, the grey color and simpler form of the proposed new poles would be less noticeable against the sky than the existing reddish-brown wood poles and would more closely resemble the color of existing streetlights, resulting in a more unified streetscape. The visual change would be relatively minor since the subtransmission line would follow the same route as the existing line, and it would not substantially degrade the visual quality or character of the landscape seen by motorists or recreational users. Since visual sensitivity for motorists would range from low to moderate and the level of visual change associated with this portion of the Project would be low to moderate, impacts would be less than significant. Please also refer to response to Comment A11-13.

A11-16 The comment states that “CCSTF believes that significant valid environmental justice issues remain with regard to the section of the Mira-Loma Jefferson Subtransmission Line that would be constructed along River Road,” but does not specify the nature of such environmental justice issues. Response to Comment A11-15 addresses aesthetic impacts related to replacement of existing overhead lines and poles along River Road. The conclusions in the Draft EIR have not changed as a result of that comment and response. The quoted statement in Draft EIR Section 7.4, *Environmental Justice*, regarding the approach under CEQA to evaluate economic or social effects resulting from physical environmental changes, remains applicable.

Regarding aesthetic impacts related to the overhead Pedley and Databank source lines, see response to Comment A11-9. The comment does not specify what potential environmental justice issues related to these proposed source lines should be “thoroughly considered.” Draft EIR Sections 4.1 through 4.18 fully evaluate all potential environmental impacts resulting from the siting, construction, and operation and maintenance of the proposed overhead source lines, and Draft EIR Section 7.4 identifies potential environmental impacts on sensitive receptors.

A11-17 The CPUC acknowledges concerns about the accessibility of Project information and opportunities to participate in the CEQA process for non-English speakers. A Spanish-language executive summary was available at the public meetings for the Draft EIR and on the Project webpage. Additionally, the CPUC provided a Spanish translator at the public meetings. CCSTF’s comment does not provide information about any environmental concerns identified during the canvassing process described in the letter; therefore, a more specific response regarding environmental impacts cannot be provided at this time.

A11-18 The requested modifications to the Project will be considered by the decision-making body. Refer to responses to Comments A11-3 through A11-17 for details.

Matthew Fagundes

From: Egle, Patrick <Patrick.Egle@dpw.sbcounty.gov>
Sent: Thursday, July 19, 2018 12:17 PM
To: CircleCityEIR
Subject: CEQA – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CIRCLE CITY SUBSTATION AND MIRA LOMA-JEFFERSON SUBTRANSMISSION LINE PROJECT FOR THE CALIFORNIA PUBLIC UTILITIES COMMISSION
Attachments: CEQA Comments_DEIR_CPUC_Circle City Substation.pdf

Mr. Peterson,

Please find attached our comments for the above referenced project.

Thank you,

PATRICK M. EGLE

Planner III
Environmental Management Division
Department of Public Works
825 E. Third Street, Room 123
San Bernardino, CA. 92415-0835
Phone: 909-387-1865
Fax: 909-387-7876



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www.SBCounty.gov



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Department of Public Works

- Flood Control
Operations
Solid Waste Management
Surveyor
Transportation

Kevin Blakeslee, P.E.
Director

Transmitted Via Email

July 17, 2018

Mr. Robert Peterson
Circle City Project
c/o Matthew Fagundes, Environmental Science Associates
1425 N. McDowell Blvd, Ste 200
Petaluma, CA. 94954

File: 10(ENV)-4.01

RE: CEQA – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CIRCLE CITY SUBSTATION AND MIRA LOMA-JEFFERSON SUBTRANSMISSION LINE PROJECT FOR THE CALIFORNIA PUBLIC UTILITIES COMMISSION

Dear Mr. Peterson:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. We received this request on June 8, 2018 and pursuant to our review, the following comments are provided:

A12-1

Permits/Operations Support Division (Melissa Walker, Chief, 909-387-7995):

- 1. Any proposed work within the San Bernardino County Flood Control District (District) right-of-way (Countyline Channel or Cucamonga Channel) will require an encroachment permit from the District. Any work within Cucamonga Channel will also require a 408 permit from the Army Corps of Engineers. Since these permits are required, their necessity and any impacts associated with the construction should be addressed in the DEIR prior to adoption or certification.

A12-2

Environmental Management Division (Chris Bland, PWE I, Stormwater Program, 909-387-8175):

- 1. On page 4.10-11, Paragraph 3, the DEIR references Riverside County's MS4 permit. However, this section needs to also include San Bernardino County's MS4 permit. Please add San Bernardino County's MS4 Permit language in this section of DEIR prior to adoption and certification.
2. On page 4.10-11, Paragraph 4, the DEIR should use the San Bernardino County's Geodatabase to confirm hydromodification needs.

A12-3

A12-4

BOARD OF SUPERVISORS

ROBERT A. LOVINGOOD
Chairman, First District

JANICE RUTHERFORD
Second District

JAMES RAMOS
Third District

CURT HAGMAN
Vice Chairman, Fourth District

JOSIE GONZALES
Fifth District

Gary McBride
Chief Executive Officer

Comment Letter A12

3. On page 4.10-12, Paragraph 2, the Geodatabase maps should be checked concerning hydromodification for this section as well. A12-5
4. On page 4.10-13, the DEIR should include the San Bernardino County General Plan. A12-6
5. On page 4.10-19, Paragraph 1, the comments concerning the Water Quality Management Plan applicability to the overall project are true. However, the Circle City site construction includes parking and driveways so at a minimum Low Impact Development (LID) should be considered. A12-7
6. On page 4.10-20, Paragraph 3, we recommend considering the implementation of LID procedures, if feasible. A12-8

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above. A12-9

Sincerely,



Michael R. Perry
Supervising Planner
Environmental Management

MRP:PE:nm
Email: CircleCityEIR@esassoc.com

3.2.12 Letter A12 – Responses to Comments from San Bernardino County

A12-1 This comment expresses appreciation for the opportunity to comment. This comment is noted, but it does not address the adequacy or accuracy of the Draft EIR.

A12-2 The comment states that any work within the San Bernardino County Flood Control District (SBC Flood Control District) right-of-way (County Line Channel or Cucamonga Channel) would require an encroachment permit from the SBC Flood Control District, and a 408 permit from the U.S. Army Corps of Engineers, and that the necessity of these permits and impacts associated with construction should be addressed in the EIR prior to adoption or certification.

In the vicinity of the proposed Project crossing of the Cucamonga Channel in San Bernardino County, the proposed Project would result in removal of existing above ground subtransmission line wood poles and replace them with above ground tubular steel poles (TSPs) along Hellman Avenue. As shown in Draft EIR project description Figure 2-16, these TSPs would be installed outside of the Cucamonga Channel. In the vicinity of the proposed Project crossing of the County Line Channel, the proposed Project would replace existing light-weight steel (LWS) poles with new LWS poles. As shown on Draft EIR project description Figure 2-13, new LWS pole locations and the proposed nearby staging and access road areas would be outside of the County Line Channel. Therefore, the proposed Project would not require activity within the San Bernardino County Flood Control District right-of-way.

A12-3 The comment states that the Draft EIR should reference the San Bernardino County MS4 permit. In response to this comment, revisions have been made to the first two paragraphs of the *NPDES Permit and Waste Discharge Requirements Applicable to the Project* discussion in Draft EIR hydrology and water quality Section 4.10.1.4, *Regulatory Setting*, to include discussion of the San Bernardino County MS4 permit.

NPDES Permits and Waste Discharge Requirements Applicable to the Project

Order Nos. R8-2010-0033 (NPDES No. CAS 618033) and R8-2010-0036 (NPDES No. CAS 618036) requires co-permittees of ~~this~~ these Orders to be responsible for managing the Urban Runoff program within ~~its~~ their jurisdiction. Co-permittees of R8-2010-0033 are local agencies, including the Riverside County Flood Control and Water Conservation District, the County of Riverside, and other incorporated cities of Riverside County within the Santa Ana Region, including the cities of Corona, Eastvale, and Norco. Co-permittees of R8-2010-0036 are also local agencies, including San Bernardino County Flood Control District and the cities of Chino and Ontario. Co-permittees to ~~this~~ these Orders have multiple additional responsibilities, including maintaining adequate legal authority to control the

contribution of pollutants to the MS4, implementing management programs and appropriate BMPs, seeking sufficient funding for urban runoff program management, and ensuring that applicants for encroachment permits for permanent connection to MS4 facilities are notified of their obligations to comply with Storm Water ordinances. Pursuant to ~~this~~ ~~these~~ permits, projects with certain characteristics that must seek discretionary approval of maps or permits from the co-permittees are required to prepare a Water Quality Management Plan (WQMP). As noted below in the *Local* regulations discussion, local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the California Public Utilities Commission's (CPUC) jurisdiction. The Project would not seek discretionary permits from local agencies; for this reason, the Project would not require preparation of a Water Quality Management Plan.

The co-permittees are also required to develop a Watershed Action Plan (RBF Consulting, 2012). One component of this Watershed Action Plan is the Hydromodification³ Management Plan, which includes delineation of existing unarmored or soft-armored stream channels in the Permit Area that are identified to be vulnerable to hydromodification from development projects (RBF Consulting, 2012). As described in this permit, if all downstream conveyance channels from a development site that drain to an adequate sump⁴ are engineered and regularly maintained⁵ to ensure design flow capacity, and no sensitive stream habitat areas will be affected, then the development would not result in significant effects to downstream channels and aquatic habitats (that is, would not cause a hydrologic condition of concern). As a means of streamlining management efforts, the Riverside County Flood Control and Water Conservation District (RCFCWCD) mapped areas that are not considered susceptible to hydromodification from development (RBF Consulting, 2012). The San Bernardino County Flood Control District has similarly mapped area not considered susceptible to hydromodification from development, and makes this information available on its Geodatabase.⁶

⁶ The Geodatabase (also called the Stormwater Facility Tracking Tool) is available online at <http://permittrack.sbcounty.gov/WAP/>.

- A12-4 The comment states that the Draft EIR should use San Bernardino County's Geodatabase to confirm hydromodification needs. As discussed in Response A12-2, the Project would replace and string poles in the vicinity of the County Line Channel and Cucamonga Channel. Both the Cucamonga and County Line channels are mapped as Engineered Hardened and Maintained channels, and the areas where Project activity would occur are not mapped as subject to hydromodification (San Bernardino County Department of Public Works, 2018).

Also see response to Comment A12-5, below.

- A12-5 The comment states that the Draft EIR should reference San Bernardino County's Geodatabase regarding hydromodification in text on Draft EIR page 4.10-12. In response to this comment, revisions have been made to the third paragraph of the *NPDES Permit and Waste Discharge Requirements Applicable to the Project* discussion in Draft EIR hydrology and water quality Section 4.10.1.4 to include reference San Bernardino County's Geodatabase.

It is through the review and approval of project-specific WQMPs that the co-permittees ensure projects do not pose a hydrologic condition of concern. For this reason, SCE would not be required to determine whether a hydrologic conditions of concern would be created due to the Project. However, for purposes of this analysis, the hydromodification susceptibility information developed for the Watershed Action Plans is used to identify channels susceptible to hydromodification. Two segments of the proposed Mira Loma-Jefferson subtransmission line alignment traverse areas with potentially susceptible stream channels: one along River Road south of the Santa Ana River corridor, and another in the vicinity of Mill Creek along the border of Riverside and San Bernardino counties (RBF Consulting, 2012, [RBF Consulting, 2011; San Bernardino County Department of Public Works, 2018](#)).

- A12-6 The comment states that Draft EIR hydrology and water quality Section 4.10.1.4, Regulatory Setting, should include reference to the San Bernardino County General Plan. However, none of the Project facilities would be constructed within unincorporated areas of San Bernardino County. Draft EIR Section 4.10.1.4 includes relevant policies from general plans of incorporated areas within San Bernardino County (i.e., Chino and Ontario).
- A12-7 The comment indicates that while SCE would not be required to prepare a Water Quality Management Plan for the proposed Project, as noted in the last paragraph of the Draft EIR hydrology and water quality Impact 4.10-1 discussion, construction at the Circle City Substation site would include parking and driveways so at a minimum Low Impact Development should be considered.

As part of compliance with the Construction General Permit (CGP), the SWPPP prepared by SCE would be designed to meet the following objective: stabilization best management practices (BMPs) installed to reduce or eliminate pollutants after construction is completed are effective and maintained (CGP Attachment A, Item K). In addition, the CGP requires that a linear underground/overhead project discharger ensure that all disturbed areas of the construction site are stabilized prior to termination of coverage under the CGP (as described in Section C.1 of CGP Attachment A). Final stabilization criteria are identified in CGP Attachment A, and specify that: (a) areas that were vegetated prior to ground disturbance must be re-vegetated at ratios identified in CGP Attachment A Section C.1, or (b) areas that

were not vegetated must be returned to original line and grade and/or compacted, or (c) equivalent stabilization measures must be employed.

- A12-8 The commenter recommends consideration of Low Impact Development procedures, if feasible, in regard to permanent access roads created as part of the proposed Project. This comment is similar to Comment A12-7; please refer to response to Comment A12-7.
- A12-9 This comment requests that subsequent environmental documents and public hearing notices should be forwarded to the SBC Flood Control District office, and identifies a SBC Flood Control District contact for further questions. This comment is noted, and the SBC Flood Control District has been added to the Final EIR mailing list. For further information about the Formal Proceeding for the Project, including how to be notified about any upcoming public hearings, contact the CPUC Public Advisor's office at public.advisor@cpuc.ca.gov.



CITY OF NORCO

CITY HALL • 2870 CLARK AVENUE • NORCO CA 92860 • (951) 735-3900 • www.norco.ca.us •



July 19, 2018

Mr. Robert Peterson
Circle City Project
c/o Matthew Fagundes, Environmental Science Associates
1425 N. McDowell Blvd, Suite 200
Petaluma, California 94954

Subject: Opposition to the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

Dear Mr. Peterson:

On June 20, 2018, the City Council of the City of Norco unanimously voted to oppose the Circle City Project. The City Council's opposition to the project is based on the negative impacts the project will have on the City of Norco and its residents and visitors as currently proposed.

A13-1

Replacement of the existing power poles with larger poles through the City of Norco, with the capacity of more overhead transmission lines, is aesthetically unacceptable to the residents of Norco because of the negative impact on property values. The transmission lines are disruptive to scenic views and the visual character of the rural, animal-keeping, open space lifestyle of Horsetown USA. This project will substantially degrade the quality of the neighborhood and its surroundings.

A13-2
A13-3

Based on the City Council's review of the project as well as public comments received, the Council has strong concerns about the health and safety of residents and animals in that area resulting from the proposed higher voltage transmission lines. The City Council firmly believes these negative impacts can be mitigated by undergrounding the transmission lines.

A13-4

The Norco City Council hopes that you will consider these concerns in your final project proposals and decisions.

A13-5

Sincerely,

Ted Hoffman, Mayor
City of Norco

cc: Norco City Council Members
Norco City Manager

Attachment: Petition by the Citizens and Homeowners of Santa Anita Road, Norco, CA

CITY COUNCIL

TED HOFFMAN
Mayor

ROBIN GRUNDMEYER
Mayor Pro Tem

KEVIN BASH
Council Member
3.2-46

BERWIN HANNA
Council Member

GREG NEWTON
Council Member

Petition Pertaining to;

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

SCH No. 2016021012

The following petition is in regards to the **Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project**, precisely the 4/10ths of a mile leg along River Road in the city of Norco between 2nd street and Corydon. The proposed plan by Edison is to replace the existing power poles with larger metal poles and to add twice as many transmission lines.

We the undersigned are not petitioning against the project that is being proposed by Edison but we are petitioning against the design of the project. This petition is more like a list of demands and is written in regards to protect and express the concerns of the 25 homes and the property owners that are located along the River Road leg and are directly involved with the poles and lines running thru our properties. Our concerns and worries are that this design will leave us with many negative impacts to our properties without giving us any positive benefits. The existing poles and power lines are already having a negative impact on our property values. The last 3 homes that sold with the power lines running thru their properties ended up taking much longer to sell and sold for a lot less then the comparable homes in the area without any poles and lines in the yard. The larger poles and higher voltage lines will have even a bigger negative impact on our property values. The safety issues also increase tremendously with the risk of down power lines and/or poles from natural disasters. There is also an underground high-pressure gas line running along the same path that raises concerns if it was to ever fail due to a natural disaster or other causes that if it ever came in contact with a power pole arc it would be catastrophic like in Porter Ranch and San Francisco. There are health concerns like cancers, tumors, migraines and more, involved from the EMF's (Electromagnetic Field) being increased by over 100%. The noise level (humming and crackling) from the existing lines are already unbearable at times depending on the weather and/or amount of power going thru the lines. The EMF's also have a negative effect on our electronics like our WIFI's, dish tv, ham radio's and wireless devices. There will be a negative impact on the aesthetics of our properties also, plus there will be privacy issues with the repairs and regular maintenance cleaning (water jetting) of the contacts. Many of us have livestock under or near these lines that become very stressed whenever there is maintenance or repairs being done to these lines. Another concern is that the new poles will be able to handle even more power lines in the future than what is being proposed to us now.

A13-6

We the undersigned feel as though there is a very simple solution to address the concerns listed above and a solution that will benefit both Edison and the homeowners. The solution will be to place any and all new lines and all of the existing lines underground thru this 4/10's of a mile stretch of River Road. The CPUC explained to us that all of the existing lower level power lines and the telecommunication lines will be placed underground per Edison's proposal. That means for at least this section of the project they will be digging a trench for the conduit for all of the smaller lines. With that being said the cost difference of adding more conduit in the same trench verses the cost of larger poles should offset any additional costs. The trench will already be dug and that is probably one of the largest cost. If Edison plans it correctly they can even add large enough or an extra conduit for any future upgrades that may be needed so as to avoid any future impact reports and/or protest.

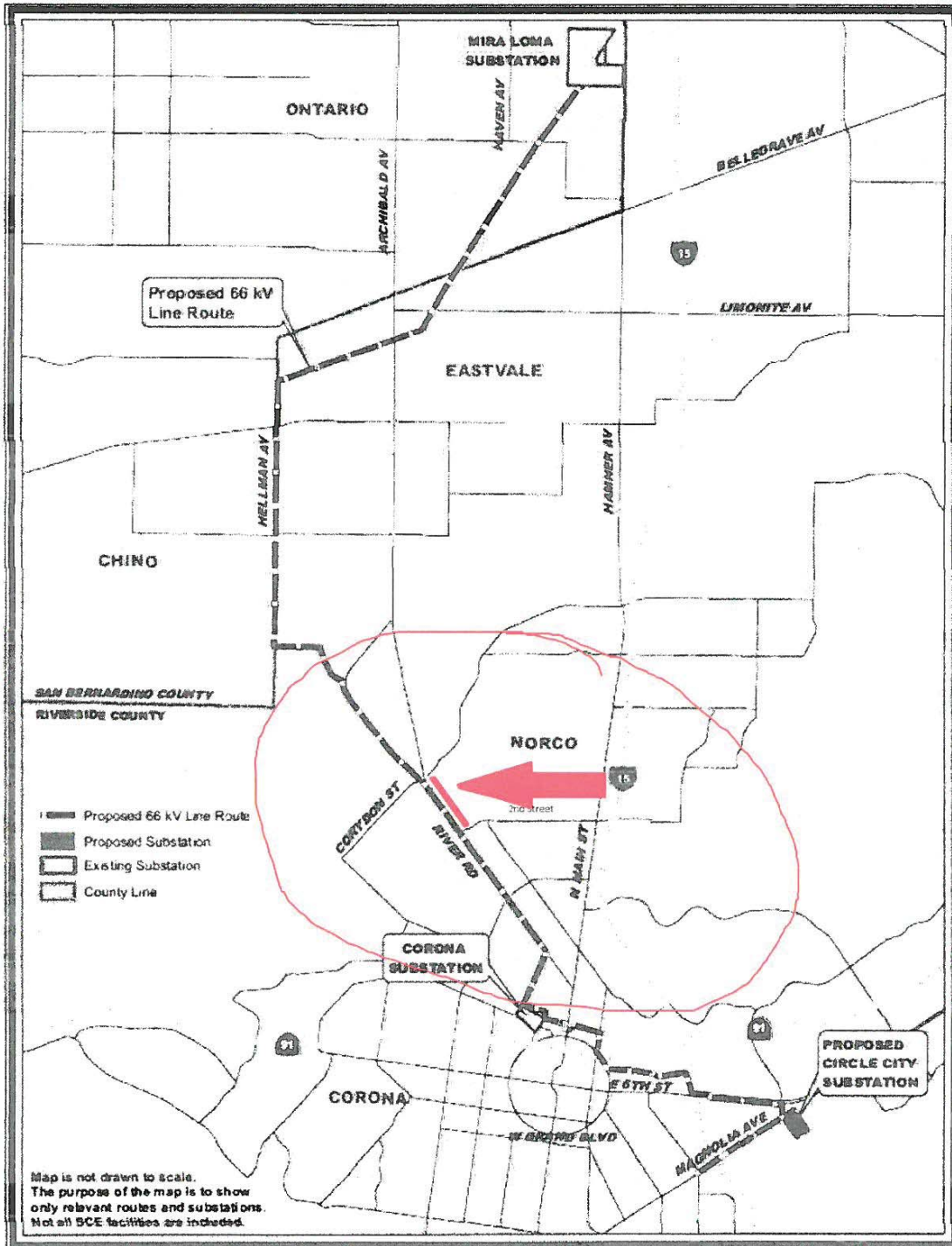
Edison's commercial's and public relations department is always boasting about how proud they are to serve and improve the communities they are a part of. We believe it is time for them to prove it to us by altering their plans to include our demands. We think it would be nice for a change that when the name Edison is mentioned they hear positive words and see smiles from their customers instead of hearing negative things and seeing frowns. Just because they have an easement does not mean they should abuse it.

A13-6
cont.

Sincerely

The citizens and homeowners of Santa Anita Rd. Norco, CA.

Figure 1


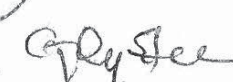

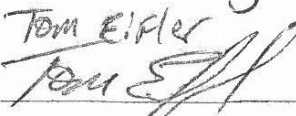




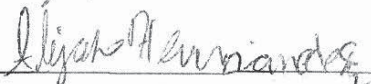


Source: Based on Southern California Edison, 2015. Application of Southern California Edison Company (U 338-E) for a Permit to Construct Electrical Facilities with Voltages between 50 kV and 200 kV: Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project. December 4, 2015.

Petition Pertaining to;

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007) SCH No. 2016021012

Signatures of Property owners and resident's proposal and demands to place all new and all existing power lines underground.

Name (print)	Address	Sign	Date
Nicole Jirsa	2242 Santa Anita Rd		7/10/18
GORDY & SUSIE	2272 SANTA ANITA RD.		7/10/18
Todd Longbrak	2279 Santa Anita RD		7/10/2018
Tom Eifler 	2190 SANTA ANITA RD		7/10/18
JERRY FURES	2212 SANTA ANITA RD		7/10/18
Tiana Kinley Reyes	2384 Santa Anita Rd.		7/11/18
Francisco Reyes	2384 Santa Anita Rd		7/11/18
Aliyah Hernandez	2394 Santa Anita Rd		7/11/18

951-751-4096

Petition Pertaining to;

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007) SCH No. 2016021012

Signatures of Property owners and resident's proposal and demands to place all new and all existing power lines underground.

Name (print)	Address	Sign	Date
Lisa Boschna	2211 Santa Anita Rd, Norco CA	<i>[Signature]</i>	7-12-18
Shane Porter	2161 Santa Anita Norco Ca	<i>[Signature]</i>	7-12-18
Andy Diaz	2102 Santa Anita Rd Norco CA	<i>[Signature]</i>	7/12/18
Sheila Schulze	2107 SANTA ANITA RD NORCO CA	<i>[Signature]</i>	
ROBERT PEAK	2110 SANTA ANITA RD	NORCO CA	<i>[Signature]</i>
Robert Fletcher	2239 Santa Anita Rd	92860 Norco, CA	<i>[Signature]</i>
Edgar Rodriguez	2191 Santa Anita Rd	Norco, CA	<i>[Signature]</i>
Angla Halford	2171 Santa Anita rd	Norco Ca	7/2/18

Petition Pertaining to;

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007) SCH No. 2016021012

Signatures of Property owners and resident's proposal and demands to place all new and all existing power lines underground.

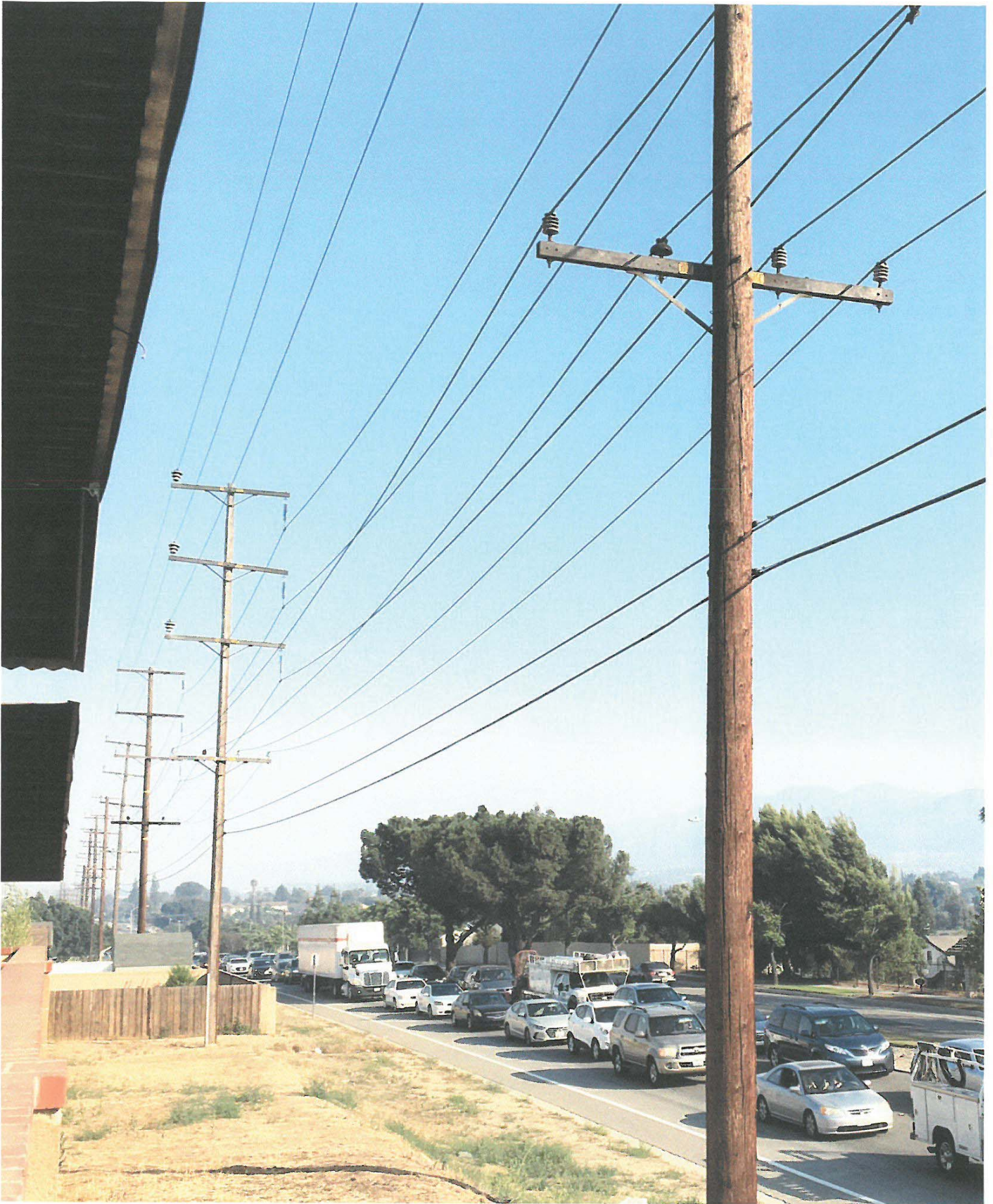
<u>Name (print)</u>	<u>Address</u>	<u>Sign</u>	<u>Date</u>
MARK ADLER	Nonco CA 92860 2130 SANTA ANITA	<i>[Signature]</i>	7-14-18
JACK-SHERRY VANDEMAN	2120 SANTA ANITA		7-14-18
MARIA ESPINOZA	2131 Santa Anita Rd	<i>[Signature]</i>	7-14-18
JIM & PATT POLLARD	2180 SANTA ANITA RD.	<i>[Signature]</i>	7-16-18
Mary Pat Bolt	2160 Santa Anita Rd.		7-16-18
James Alderson	2170 Santa Anita Rd.		7-16-18
SHAYEH + ESMA KOETSIER	2202 SANTA ANITA RD.		7/16/18
RICHARD MORROE	2282 SANTA ANITA RD		7/16/18

Petition Pertaining to;

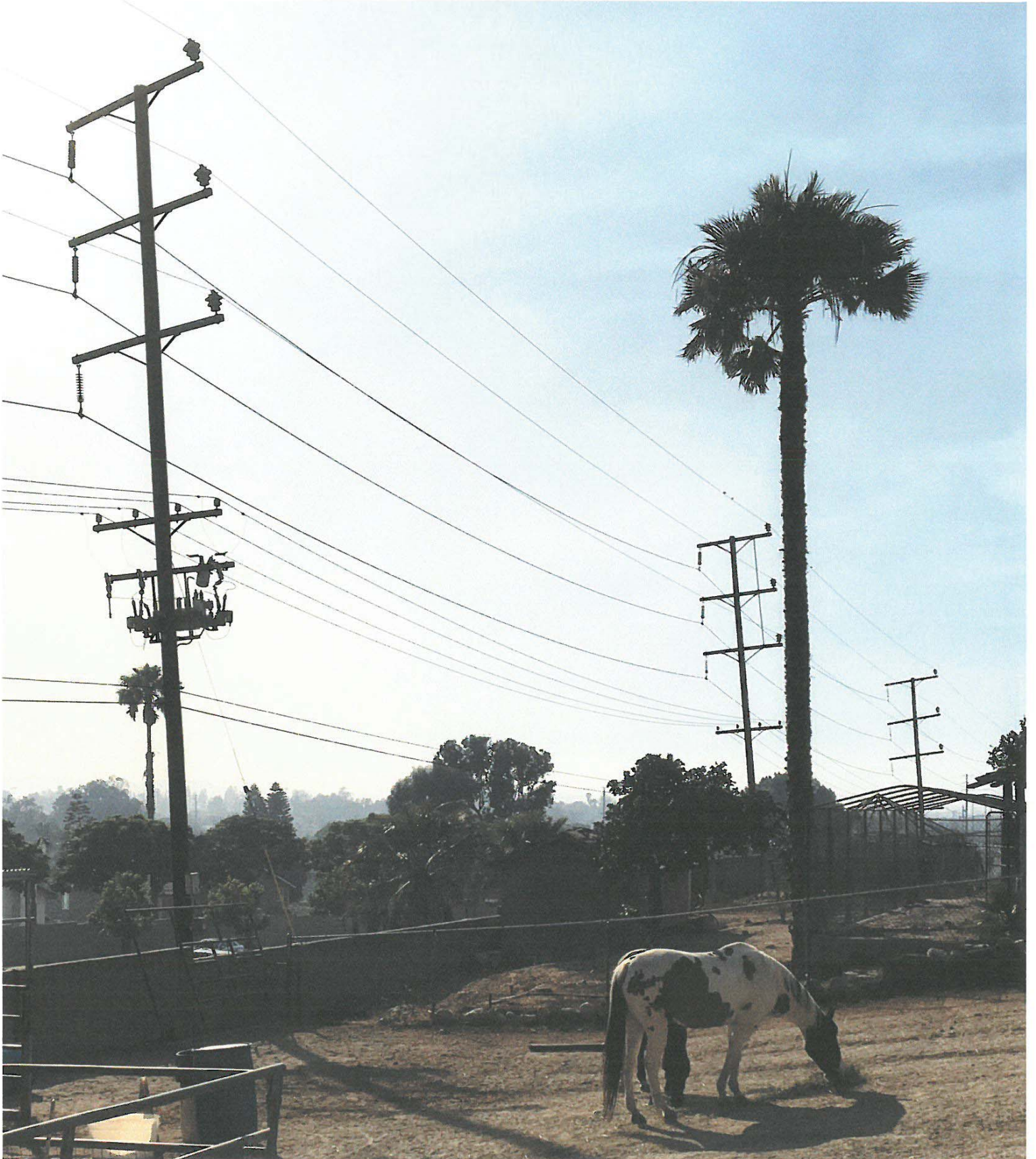
Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007) SCH No. 2016021012

Signatures of Property owners and resident's proposal and demands to place all new and all existing power lines underground.

Name (print)	Address	Sign	Date
CESAR VMADEZ	2354 Santa Anita Rd Norco CA	<i>[Signature]</i>	7-16-2018
Stephen Boone	2344 Santa Anita Rd, Norco, CA	<i>[Signature]</i>	7-16-2018
TIM HAGEN	2140 SANTA ANITA RD Norco, CA	<i>[Signature]</i>	7-16-2018
Troy Hall	2364 SANTA ANITA RD	<i>[Signature]</i>	7-17-18
ANDY SANTO'S	2334 Santa Anita	<i>[Signature]</i>	7/17/2018
Kathy Wilson	2249 Santa Anita Rd	<i>[Signature]</i>	7-17-18
Kim Kuhn	2269 Santa Anita Rd	<i>[Signature]</i>	7-17-18



RIVER ROAD ^{3.2-54} JUNE 2018



3.2.13 Letter A13 – Responses to Comments from City of Norco

A13-1 The comment states that the City Council of the City of Norco unanimously voted to oppose the proposed Project based on negative impacts it would have on the City; no response required.

A13-2 The comment expresses opposition to replacement of existing power poles with larger poles due to aesthetic concerns; no response required.

A13-3 The comment indicates that the proposed subtransmission lines are disruptive to scenic views and visual character and would have a negative effect on property values. The Draft EIR concluded that although there would be a visual change associated with the proposed Project along this segment of River Road in the City of Norco, the overall visual impact would not be significant (see the third and fourth paragraphs of the *Mira Loma-Jefferson 66 kV Subtransmission Line* discussion of Draft EIR aesthetics Impact 4.1-3).

For discussion of potential Project effects related to economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.

A13-4 Potential health and safety impacts of the proposed Project in City of Norco are discussed in Draft EIR Section 4.9, *Hazards and Hazardous Materials* and Section 4.3, *Air Quality*. As discussed under hazards and hazardous materials Impact 4.9-7, the operation of the proposed subtransmission lines would have a less than significant effect regarding the probability of causing a wildfire. Impacts related to potential small electrical shocks would be reduced to less than significant through implementation of hazards and hazardous materials Mitigation Measure 4.9-8. In addition, the health risk from the short-term diesel particulate matter (DPM) emissions that would be associated with construction of the Mira Loma-Jefferson subtransmission line would be insignificant, and this impact would be less than significant (see Draft EIR air quality Impact 4.3-7).

For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.

A13-5 The comment suggests that potential health and safety impacts of the proposed subtransmission lines should be mitigated by undergrounding the lines. As noted in response to Comment A13-4, the health and safety impacts identified in the Draft EIR were determined to be less than significant or less than significant with mitigation. Therefore, from a CEQA environmental impact perspective, there is no requirement or purpose for the EIR to identify a mitigation measure to underground the proposed subtransmission lines along River Road. Please also see Master Response 1: Underground versus Overhead Subtransmission Lines.

A13-6 The attached petition was also submitted individually and is identified in Section 3.3, *Individuals Comments and Responses*, as Comment Letter B25. Refer to responses to Comments B25-4 through B25-14.



PAUL S. LEON
MAYOR

ALAN D. WAPNER
MAYOR PRO TEM

JIM W. BOWMAN
DEBRA DORST-PORADA
RUBEN VALENCIA
COUNCIL MEMBERS

SCOTT OCHOA
CITY MANAGER

SHEILA MAUTZ
CITY CLERK

JAMES R. MILHISER
TREASURER

July 19, 2018

Mr. Robert Peterson
Circle City Project
c/o Mathew Fagundes, Environmental Science Associate
1425 N. McDowell Blvd, Ste 200
Petaluma, California 94954

RE: NOTICE OF AVAILABILITY (NOA) OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DRAFT EIR) FOR THE PROPOSED CIRCLE CITY SUBSTATION AND MIRA LOMA-JEFFERSON SUBTRANSMISSION LINE PROJECT (A.15-12-007)

Mr. Peterson,

Thank you for allowing the City of Ontario an opportunity to review and comment on the above referenced project. After reviewing the accompanying NOA, the City of Ontario requests the following comments be addressed:

A14-1

1. The proposed pole locations, including their required setbacks, shall not interfere with the current or future improvements/dedications per the City of Ontario Master Plan of Streets and Highways.

A14-2

2. This project will be required to submit grading plans for review and approval of the proposed pole locations within the City of Ontario.

A14-3

We appreciate being involved in the environmental review of the project and look forward to continued communications regarding this project. If you have any questions regarding our comments, please contact me at (909) 395-2421.

A14-4

Sincerely,

Richard Ayala
Senior Planner

3.2.14 Letter A14 – Responses to Comments from City of Ontario

A14-1 The comment is an introductory statement that indicates the City of Ontario has submitted its comments based on the City’s review of the Draft EIR Notice of Availability. No response is necessary.

A14-2 The following sentence has been added to the last sentence of Draft EIR Project description Section 2.5.2.1, *Overview*, to state that exact pole and infrastructure locations would be planned to minimize any conflict with existing and planned features in the public right-of-way.

Prior to placement of poles and other subtransmission infrastructure, SCE would conduct an evaluation of existing and approved features along the public rights-of-way, including but not limited to, existing and planned drive ways, street light poles, underground utilities, and other features. Exact pole and infrastructure locations would be planned to minimize any conflict with these features.

A14-3 As stated in Draft EIR introduction Section 1.4.2, *Other Agencies*, SCE would not be required to obtain local discretionary (e.g., use) permits since the CPUC has preemptive jurisdiction over the construction, operation, and maintenance of SCE facilities in California; however, SCE would still have to obtain all ministerial building and encroachment permits from local jurisdictions, and the CPUC’s GO 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions.

A14-4 The comment is a closing statement. No response is necessary.

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2635 Fax:(760) 692-1498



July 20, 2018

Robert Peterson
CPUC Project Manager
1425 N. McDowell Blvd., Suite 200
Petaluma, CA 94954

Re: Circle City Substation & Mira Loma Jefferson Sub Transmission Line Project

Dear Mr. Peterson,

This letter is written on behalf of the Rincon Band of Luiseño Indians. We have received your Notice of Availability of a Draft Environmental Impact Report (Draft EIR) regarding the Circle City Substation & Mira Loma Jefferson Sub Transmission Line Project. We thank you for the opportunity to provide comments. The identified location is within the Territory of the Luiseño people, and is also within Rincon’s specific area of Historic interest.

A15-1

Embedded in the Luiseño territory are Rincon’s history, culture and identity. We have reviewed the Draft EIR and have the following comments:

- Mitigation Measure 4.5-2 calls for an archaeologist only upon discovery of cultural resources. However, the Draft EIR states in the first paragraph of page 4.5-27 that the “potential for subsurface prehistoric archaeological deposits is moderate in areas not having undergone substantial ground disturbances in the past and at depths below limits of previous ground disturbances...” Therefore, Rincon is not in agreement with this mitigation measure. Instead, Rincon requests that this mitigation measure be replaced with archaeological and Luiseño tribal monitoring for all ground disturbing activities that take place in undisturbed soil to address the moderate potential for cultural resource discoveries.
- Regulatory language / Treatment plan addressing discovery of cultural resources should be added.
- Regulatory language addressing the discovery of human remains should be added.

A15-2

A15-3

A15-4

If you have additional questions or concerns please do not hesitate to contact our office at your convenience at (760) 297-2635.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Destiny Colocho
Tribal Historic Preservation Officer
Rincon Cultural Resources Department

Bo Mazzetti
Tribal Chairman

Tishmall Turner
Vice Chairwoman

Steve Stallings
Council Member

Laurie E. Gonzalez
Council Member

Alfonso Kolb
Council Member

3.2.15 Letter A15 – Responses to Comments from Rincon Band of Luiseño Indians

- A15-1 It is noted that the Project Area is within the Rincon Band of Luiseño Indians’ ancestral territory. The commenter was included in Project-related Native American consultation efforts related to compliance with Assembly Bill 52.
- A15-2 The commenter cites a portion of the Draft EIR cultural resources Impact 4.5-2 discussion, which states in part “potential for subsurface prehistoric archaeological deposits is moderate in areas not having undergone substantial ground disturbances in the past and at depth below limits of previous ground disturbance.” However, the commenter ignores the language in the cultural resources *Archaeological Sensitivity* discussion in Draft EIR Section 4.5.2.2, *Cultural Resources Setting*, which goes on to explain that “However, the majority of the Project Area has been heavily disturbed by historical and modern activities, notably road construction, urban and industrial development, dairy farming, crop cultivation, and railroad activities.” As specifically discussed in the cultural resources *Archaeological Resources* discussion in the same Draft EIR section, all known archaeological sites in the area have been destroyed.

Furthermore, upon discovery of prehistoric or historic-era archaeological resources, Mitigation Measure 4.5-2 provides for the applicant to “cease all construction activity within 100 feet of the find and flag off the area for avoidance.” This measure also includes review of any materials by a qualified archaeologist, and consultation with Native American tribes.

No tribal monitoring has been specifically proposed as a mitigation measure due to low potential to encounter undisturbed indigenous archaeological deposits. This low potential is due to the Project Area having been heavily disturbed by historical and modern activities, notably road construction, urban and industrial development, dairy farming, crop cultivation, and railroad activities (see *Archaeological Sensitivity* discussion in Draft EIR cultural resources Section 4.5.2.2, *Cultural Resources Setting*). However, Draft EIR Mitigation Measure 4.5-1 has been revised to require development of a Cultural Resources Management Plan (CRMP) for the proposed Project. Development of the CRMP would result in a requirement to conduct archaeological monitoring for the proposed Project within designated areas of moderate potential for archaeological resources that are in previously undisturbed sediment (see response to Comment A20-36).

- A15-3 The regulatory language addressing potential discovery of cultural resources during construction of the proposed Project is presented in Draft EIR cultural resources Sections 4.5.2.3 and 4.5.5.1 and Mitigation Measure 4.5-2.

A15-4 The regulatory language addressing discovery of human remains is presented in Sections 4.5.2.3, *Regulatory Setting*, and 4.5.5.1, *Approach for Cultural Resources Analysis*.

Braun Blaising Smith Wynne, P.C.

Attorneys at Law

July 20, 2018

Via E-Mail (CircleCityEIR@esassoc.com)

Rob Peterson
California Public Utilities Commission
c/o Matt Fagundes
Environmental Science Associates
1425 N. McDowell Boulevard, Suite 200
Petaluma, CA 94954

Subject: **Comments of the City of Corona On The Draft Environmental Impact Report For The Circle City Project (Application 15-12-007)**

Dear Mr. Peterson:

The City of Corona ("Corona") hereby submits the following comments on the Draft Environmental Impact Report ("DEIR") for Southern California Edison's ("SCE") proposed Circle City Project ("CCP"). The DEIR was released in May 2018 as part of the California Public Utilities Commission's ("Commission" or "CPUC") Environmental Impact Review of the CCP proposal, Application ("A.") 15-12-007.

A16-1

INTRODUCTION

Corona is a municipality of approximately 160,000 residents located in Riverside County, California. Corona has its own municipal electric utility, the Corona Department of Water and Power, which provides electric service to portions of the city. The remainder of the city receives electric service from SCE. SCE owns and operates a number of transmission facilities located within Corona's city limits.

SCE's proposed CCP would involve the construction of a new substation and a number of 66 kV subtransmission lines within Corona's city limits. As proposed, the CCP would result in significant, unavoidable, and in many cases permanent environmental impacts on the City of Corona and its citizens. In light of these impacts, Corona is greatly encouraged by the DEIR's clarification of the CCP's two project objectives, and the DEIR's selection of Alternative D1 as the environmentally superior alternative for achieving the CCP's Distribution Service Objective. Corona strongly supports Alternative D1, and believes that the selection of Alternative D1 will eliminate many of the CCP's most serious environmental impacts. At the same time, Corona believes that there are still a number of opportunities to improve the DEIR to further reduce the CCP's environmental impacts. To achieve these improvements, Corona respectfully requests that the Commission adopt the following four modifications to the DEIR:

A16-2



- 1. The DEIR should be modified to specifically address the environmental justice impacts avoided by the selection of Alternative D1. A16-3
- 2. The DEIR should be modified to identify and require mitigation measures to reduce the aesthetic and operating noise impacts of the Alternative D1 battery installation. A16-4
- 3. The DEIR should be modified to recognize that both the proposed Mira-Loma Jefferson Subtransmission Line under both the CCP and Alternative C1 would result in substantial permanent aesthetic impacts along River Road in Corona. A16-5
- 4. The DEIR should be modified to require that the River Road section of the proposed Mira-Loma Jefferson Subtransmission Line be wholly or partially undergrounded to avoid permanent substantial aesthetic impacts. A16-6

Corona’s positions on these matters are discussed in detail below.

COMMENTS ON THE DRAFT EIR

1. Corona Supports The DEIR’s Clarification Of Project Objectives

In its Proponent’s Environmental Assessment, SCE identified six distinct objectives for the CCP.¹ The DEIR correctly distills the project down to two basic objectives:

Subtransmission Service Objective – Maintain electrical system reliability by addressing overloads on the Mira Loma-Corona-Jefferson and Mira Loma-Corona 66 kV subtransmission lines that could occur under peak electrical demand conditions during the 2017 to 2026 forecast period. A16-7

Distribution Service Objective – Ensure that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.²

Corona supports the DEIR’s clarification of the CCP’s project objectives. The two objectives identified by the DEIR describe the objectives driving the CCP proposal more accurately and specifically than the vague, generally applicable objectives identified by SCE. More importantly, the DEIR’s clarification of the project objectives accurately reflects the fact that SCE’s CCP proposal is actually composed of two distinct sub-projects, each of which is intended to meet its own distinct objective. A16-8

¹ SCE’s Objectives are identified in the DEIR at 1-4 – 1-5.

² DEIR at 1-4 – 1-5.



First, in order to meet the *Subtransmission Service Objective*, SCE proposes to construct a 10.9 mile 66 kV subtransmission line (the Mira Loma-Jefferson Subtransmission Line). This line would run north from the existing Corona Substation to the Mira Loma Substation. From the Corona Substation to River Road the line would be placed underground, while the 1.92-mile segment of the line running along River Road in Corona would be built as an overhead line, with lightweight steel (“LWS”) poles ranging anywhere from 60 feet to 85 feet high replacing the shorter existing wood poles.

A16-9

Second, in order to meet the *Distribution Service Objective*, SCE proposes the construction of a new substation and two double-circuit source lines:

The Circle City Substation – a new 66/12 kV SCE substation to be constructed within Corona.

The Pedley Source Lines – two 66kV subtransmission lines in a double-circuit configuration that would cover approximately 3.5 miles and would connect the Circle City substation with the existing Corona substation.

A16-10

The Databank Source Lines – two 66kV subtransmission lines in a double-circuit configuration that would cover approximately 1.2 miles and connect the Circle City substation with an existing 66 kV subtransmission line located near the intersection of Rimpau Avenue and Magnolia Avenue.

The DEIR’s clarification of the project objectives makes the analysis of the project much more accurate and straightforward. Corona strongly supports this clarification.

A16-11

2. Corona Strongly Supports The DEIR’s Identification Of Alternative D1 As The Environmentally Superior Alternative For The Distribution Service Objective

The DEIR selects Alternative D1 as the environmentally superior alternative for meeting the CCP distribution service objective.³ Corona strongly supports this conclusion.

A16-12

Alternative D1 would replace the proposed Circle City Substation with a distribution-level 12 kV battery storage facility. This facility would be constructed on the same lot as the proposed Circle City Substation. SCE’s own analysis concluded that constructing a battery storage facility with two 5 MW installations would defer the need for the proposed Circle City substation until 2027, while larger installations could push the need for a new substation even further into the future.⁴

³ DEIR at 5-13 – 5-14.

⁴ DEIR at 3-20.



Even more importantly from Corona’s perspective, Alternative D1 would eliminate the need for both the Pedley Source Lines and the Databank Source Lines.⁵ Instead, the battery systems would provide all needed distribution support through the use of two existing distribution circuits. The battery facilities would be connected to these existing circuits through two very short underground connections.⁶

A16-13

Corona supports Alternative D1 because Alternative D1 offers radically reduced aesthetic, construction, and environmental justice impacts compared to the proposed CCP.

A16-14

a. Alternative D1 Significantly Reduces Aesthetic Impacts

By eliminating the Pedley and Databank Source Lines, Alternative D1 would greatly reduce the CCP’s negative aesthetic impacts within Corona. The DEIR correctly recognizes that the Pedley source line would substantially degrade the visual character of the view from I-15, resulting in a significant impact on a designated scenic roadway.⁷ Similarly, the DEIR accurately states that the Databank Source Lines would substantially degrade the existing visual character along East 6th Street and Magnolia Avenue.⁸

A16-15

In addition, eliminating the Source Lines would eliminate a number of negative aesthetic impacts that were not explicitly identified in the DEIR. For instance, the Pedley Source Line would involve the removal of 8 existing wood distribution poles and the installation of 16 new subtransmission poles (1 wood pole, 11 lightweight steel poles, and 4 tubular steel poles) along East 3rd street.⁹ These poles would be located in a residential neighborhood one block away from City Park. Alternative D1 avoids significant permanent aesthetic impacts in this area.

A16-16

In addition, the alternative D1 battery installation should have significantly less aesthetic impact than the proposed CCP’s Circle City Substation. The battery installation would occupy a smaller footprint than the proposed Circle City Substation, and would be much less visible due to its significantly reduced height: the Alternative D1 battery installation would have a maximum height (including cooling facilities) of 15 feet, while the proposed Circle City Substation would have a maximum height of 45 feet.¹⁰ This size and height difference means that the Alternative D1 battery installation should be significantly less visible – and therefore significantly less aesthetically disruptive – than the proposed Circle City Substation.

A16-17

⁵ DEIR at 3-21.

⁶ DEIR at Figure 3-3.

⁷ DEIR at 4.1-55 (See also Table 4.1-1).

⁸ DEIR at 4.1-55 – 4.1-56.

⁹ DEIR at Figure 2-5.

¹⁰ DEIR at 4.1-64



b. Alternative D1 Eliminates Source Line Construction Impacts

Building the proposed CCP’s Source Lines would have involved major construction along some of Corona’s most important transportation and economic corridors. For instance, the Pedley Source Line would have included the installation of 21 lightweight steel (“LWS”) poles and three tubular steel poles (“TSPs”) along Sixth Street, a major thoroughfare that connects eastern Corona with the City’s downtown neighborhood, while the Databank Source Line would have involved the installation of 26 new poles along Magnolia Avenue, another significant street in Corona. This construction would cause significant, traffic, noise, and air-quality impacts in these areas. By eliminating the need for the Source Lines, Alternative D1 entirely eliminates these construction impacts, significantly reducing the CCP’s overall impact on Corona and its citizens.

16-18

c. Alternative D1 Significantly Reduces Environmental Justice Impacts

Alternative D1 significantly reduces the CCP’s environmental justice impacts. Although CEQA is generally focused on physical environmental impacts, a 2012 opinion from the California Attorney General clarifies that a project’s economic and social effects should be considered in CEQA analysis:

First, as the CEQA Guidelines note, social or economic impacts may lead to physical changes to the environment that are significant [Citation]. To illustrate, if a proposed development project may cause economic harm to a community’s existing businesses, and if that could in turn “result in business closures and physical deterioration” of that community, then the agency “should consider these problems to the extent that potential is demonstrated to be an indirect environmental effect of the proposed project. [Citation Omitted].¹¹

A16-19

Further, the 2012 Attorney General Opinion clarifies that CEQA requires a lead agency to consider whether a project’s effects, while they might appear limited on their own, are “cumulatively considerable” and therefore significant. This requires that the lead agency consider each environmental impact in light of the burdens the impacted community is already bearing. For instance, “the fact that an area already is polluted makes it more likely that additional, unmitigated pollution will be significant,”¹² while a project that would increase traffic noise is more significant in an area already suffering from a traffic noise problem.¹³

Under the proposed CCP the Circle City Substation, Pedley Source Lines, and Databank Source Lines would be constructed entirely within census tracts 6065041600 and 6065041409. Both of these census tracts are identified as Disadvantaged Communities (“DAC”) by CalEnviroScreen

¹¹ Office of the California Attorney General Fact Sheet, *Environmental Justice at the Local and Regional Level Legal Background* (July 10, 2012) at 4. Available at: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

¹² Id. at 3-4.

¹³ Id. at 4.



3.0.¹⁴ This means that these communities have been identified as having: 1) a high concentration of low-income residents; and 2) disproportionate exposure to environmental pollution or other hazards.¹⁵ Constructing the Circle City Substation and Source Lines would lead to “cumulatively considerable” air quality, noise, traffic, and aesthetic impacts. These impacts that would be reasonably likely to hinder economic growth and new development, and suppress property values in these economically vulnerable communities.

In addition, the proposed Source Lines would have a direct impact on new development and, potentially, disrupt future development in these vulnerable DACs. New industrial buildings were constructed in 2013 in the vicinity of Magnolia Avenue and Sixth Street in addition to new landscaping being installed in the Sixth Street center median. The corridors on Sixth Street and Magnolia Avenue include numerous businesses and both streets are travel corridors into the city’s center. Preserving existing businesses and encouraging new development are key to Corona’s efforts to reduce improve the economic circumstances of its DACs. By eliminating the Source Lines, Alternative D1 prevents potential significant disruptions to these efforts.

A16-19
cont.

Corona requests that the EIR be amended to specifically address the fact that Alternative D1 eliminates the environmental justice impacts associated with meeting the project’s distribution service objective by eliminating the Source Lines that would run through the DACs in question.

3. The EIR Should Adopt Mitigation Measures To Further Reduce The Impacts Of Alternative D1

Corona believes that the Final EIR would be further strengthened, and project impacts further reduced, if the Commission were to expand the Final EIR to require reasonable measures to mitigate the noise and visual impact of the Alternative D1 battery installation. The DEIR specifically mentions that the battery installation would have a maximum height of 15 feet above finish grade, and a maximum noise level of 75 dBA measured 3 feet outside the battery storage facility perimeter fence. In addition, Corona notes that the battery installation would be located somewhat closer to Magnolia Avenue than the Circle City Substation would have been, potentially increasing the facility’s aesthetic impact,¹⁶ and that while the DEIR specifically states that the substation structures would be surrounded by a tan colored wall that would not substantially degrade the existing visual character of the landscape,¹⁷ it is not clear that similar aesthetic measures would be taken by SCE for the Alternative D1 battery installation. Corona recommends that the Final EIR specifically require that the battery installation be surrounded with a similar tan colored wall, and that, to the extent possible, SCE be required to use trees

A16-20

¹⁴ Exhibit A – CalEnviroScreen 3.0 maps of census tracts 6065041600 and 6065041409.

¹⁵ California Environmental Protection Agency, *Designation of Disadvantaged Communities Pursuant to Senate Bill 535* (April 2017) at 2. Available at: <https://calepa.ca.gov/wp-content/uploads/sites/62/2017/04/SB-535-Designation-Final.pdf>

¹⁶ DEIR at Figure 3-3, Figure 3-4.

¹⁷ DEIR at 4.1-59 – 4.1-60.



and/or native vegetation to further reduce the aesthetic and operating noise impact of the installation.

↑ A16-20
cont.

4. Alternative C1 Should Be Modified To Recognize And Reduce Significant Aesthetic Impacts Along River Road

Although Corona is highly encouraged by the DEIR’s selection of Alternative D1 to meet the CCP’s distribution service objective, Corona is disappointed by DEIR’s failure to recognize the significant negative aesthetic impacts that the Mira-Loma Jefferson Subtransmission Line would have along River Road in Corona. For Corona’s purposes, both the proposed project and the DEIR’s environmentally superior alternative, Alternative C1, are identical. Under both options, 61 existing wood poles located along a 1.92 mile stretch of River Road would be replaced with 61 significantly taller lightweight steel poles. The new Mira Loma-Jefferson Subtransmission Line would be installed on these poles.

A16-21

River Road is a well-trafficked road that acts as the primary transportation corridor linking a number of middle-class residential developments in north Corona with central Corona. Currently, a section of the 66 kV Archibald-Chino-Corona Subtransmission Line runs along this section of River Road. This line consists of approximately 62 wood subtransmission poles with 33 kV and 12 kV distribution underbuild.¹⁸ These existing wood poles range from approximately 58 to 61 feet tall. Under both the proposed project and Alternative C1, these existing wood poles would be replaced with 61 LWS poles, each with a proposed height of *up to 85 feet*.

A16-22

The DEIR concludes that the despite its use of significantly taller LWS poles, the project’s aesthetic impact on the River Road area would be “less than significant.”¹⁹ This conclusion is in error for two reasons.

First, The DEIR’s aesthetic impact analysis currently only directly addresses the project’s aesthetic impact on motorists on River Road and users of River Road park.²⁰ This ignores the direct impact that the taller LWS poles would have on views from two schools and the Corona-Norco Family YMCA:

A16-23

- The new taller LWS poles and line would be constructed immediately in front of the Aburndale Intermediate School located at 1255 River Road. The taller LWS poles and line would be plainly visible from the school’s parking lot, front entrance, and athletic facilities.
- The new taller LWS poles and line would also be visible from classrooms and play areas of George Washington Elementary School, which is located immediately behind Aburndale Intermediate School at 1220 W Parkridge Ave.

¹⁸ DEIR at 2-24.

¹⁹ DEIR at 4.1-58.

²⁰ DEIR at 4.1-57.



- The new taller LWS poles and line would run right in front of the Corona-Norco Family YMCA located at 1331 River Road, and would be visible from the YMCA’s parking lot, front entrance, and recreational facilities.

A16-23
cont.

The DEIR should be amended to include the aesthetic impacts on both schools and the Corona-Norco Family YMCA. The visual sensitivity for each of these sites should be categorized as “high.”

A16-24

Second, the DEIR errs in concluding, *based on the simulation view provided in Figure 4.1-10*, that the new poles would only result in “relative minor” visual change to the area because “The lighter color and simpler form of the new poles would be less noticeable against the sky when compared with the existing reddish-brown colored poles” and because “the new poles more closely resemble the color of existing streetlights, resulting in a more unified streetscape.”²¹ The DEIR’s reliance on Figure 4.1-10 is particularly problematic. Figure 4.1-10 provides the current view from River Road Park:

A16-25

IMAGE 1 – First Photograph of DEIR Figure 4.1-10



²¹ DEIR at 4.1-57 – 4.1-58.



Figure 4.1-10 also includes a “visual simulation” of the new poles as seen from River Road Park:

IMAGE 2 – Second Photograph of DEIR Figure 4.1-10



This “visual simulation” (which was provided by SCE) is misleading. Although it appropriately demonstrates that the new poles would be *significantly* taller than existing poles, Figure 4.1-10 depicts the new poles as being a uniform light grey color that blends into the background sky, while failing to depict, among other things, the shadowing that makes the streetlight in the foreground of Figure 4.1-10 and the existing wood poles in the first photo of Figure 4.1-10 clearly stand out.

A16-26

In reality, even under the best visual conditions LWS poles of this type and color would stand out from the background far more than Figure 4.1-10 suggests. Image 3 (also attached as Exhibit B) is a photograph of new 73-77 foot tall LWS poles installed along Railroad Street in Corona.

A16-27

///



Image 3 – Photograph of Railroad Street LWS Poles



Image 4 (also attached as Exhibit C) is a photograph showing both wood poles and taller LWS poles with a large number of wires at the intersection of Railroad Street and Cota Street in Corona.

A16-28

Image 4 – Photograph of Poles at Railroad and Cota Streets





Image 5 (also attached as Exhibit D) is a photograph of grey-painted LWS poles along Railroad Street in Corona under typical lighting conditions.

A16-29

Image 5 – Photograph of Railroad Street LWS Poles



Images 3, 4, and 5 clearly demonstrate that the light grey color does not make LWS poles blend into the sky as depicted in Figure 4.1-10. Instead, despite their color, these poles are the *dominant visual features* of their areas, with the level of their visual dominance determined by pole height, and, to a lesser extent, the number of wires strung on the poles, not color. The flawed nature of the DEIR’s reliance on Figure 4.1-10 is most clearly demonstrated by a simple side-by-side comparison of the “visual simulation” and Image 5, a real-world photograph of similar LWS poles. This comparison is provided as Exhibit E.

A16-30

The DEIR should be modified to eliminate all reliance on Figure 4.1-10, particularly the claim that due to the color of the poles the “visual change from this location would be relatively minor.”²² Instead, the DEIR should recognize that the color of the pole is of minimal relevance, and that the determining factor for visual change is pole height. Given the substantial increase in pole height (as demonstrated in Figure 4.1-10) the visual change from River Road should be changed from “Low to Moderate” to “Moderate to High,” and the visual change from River Road Park and other affected sites (including the Schools and YMCA) should be changed to “High.” In order to prevent these permanent, significant aesthetic impacts to the River Road area, the Alternative C1 should be amended eliminate the existing overhead lines and poles and

A16-31

²² DEIR at 4.1-57 – 4.1-58.



construct the River Road Section of the Mira-Loma Jefferson Subtransmission Line entirely underground.

↑ A16-31
cont.

In the alternative, if the Commission is unwilling to require that the entire River Road Section of the Mira-Loma Jefferson Subtransmission Line be placed underground, the Commission should, at a minimum, make the following three modifications to Alternative C1. First, the Commission should modify Alternative C1 to require that the section of the line running along River Road from Second Street to N Lincoln Avenue be underground. This section includes all of the sensitive viewing areas identified above, including River Road Park, the schools, and the YMCA. Second, for the remaining overhead portions of the River Road line, the Commission should modify Alternative C1 to require that SCE use LWS poles no taller than 60 feet. This would significantly reduce the overall aesthetic impact of the project compared to SCE's proposed poles, which could be as tall as 85 feet. Third, the Commission should require that all "underbuilt" distribution lines and telecommunications lines running along the River Road route be placed underground rather than attached to the LWS poles. As Image 4 clearly demonstrates, the number of lines running along the poles is an important factor in determining the project's visual impact. Limiting the number of lines running along the poles will reduce visual clutter and mitigate the aesthetic impact of the above ground portions of the line.

A16-32

A16-33

A16-34

CONCLUSION

The City of Corona thanks the Commission for its consideration of the matters raised in these comments, and respectfully requests that the above-requested modifications be included in the Commission's Final EIR.

A16-35

Dated: July 20, 2018

Respectfully submitted,

_____/S/_____

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Attorney for:
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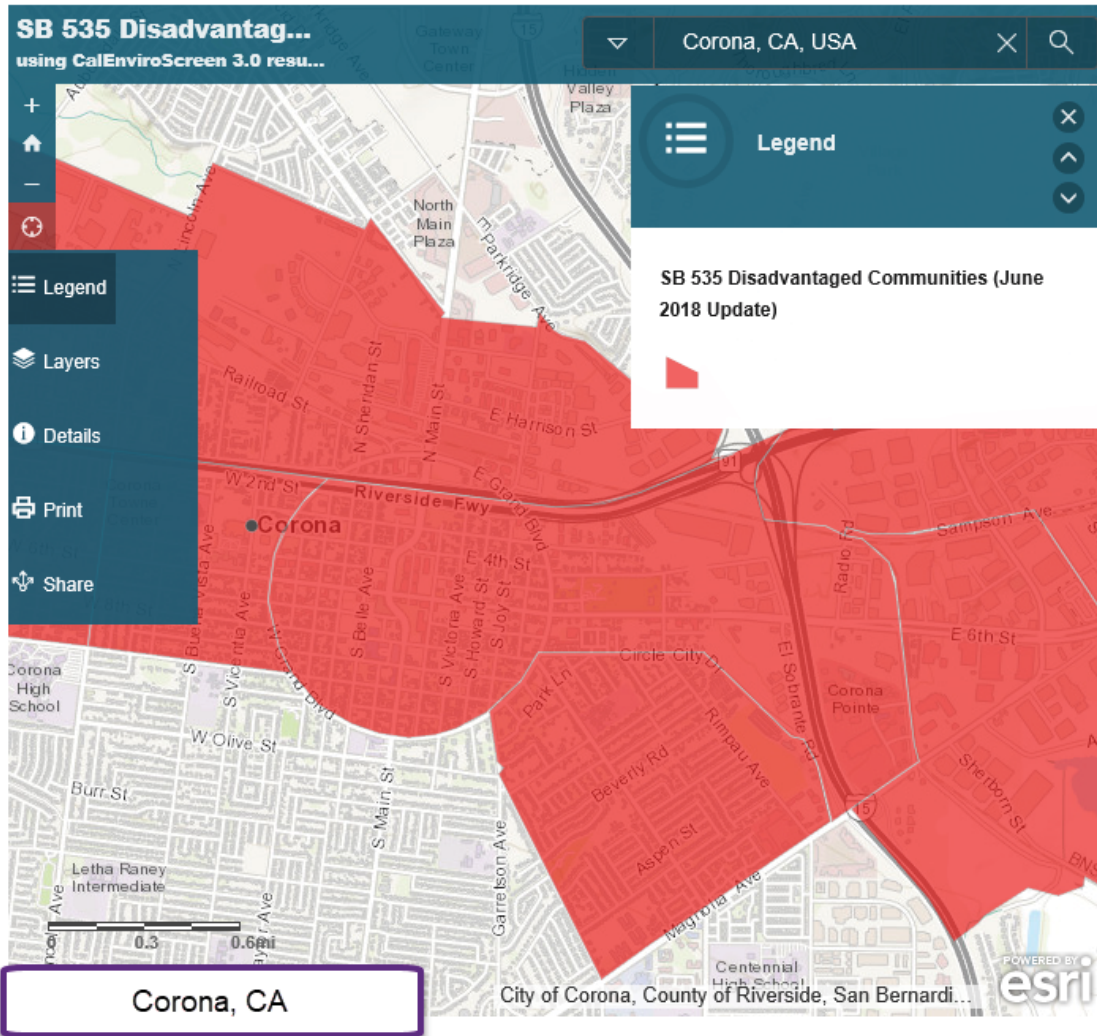
Exhibit A

City of Corona Comments on CCP DEIR

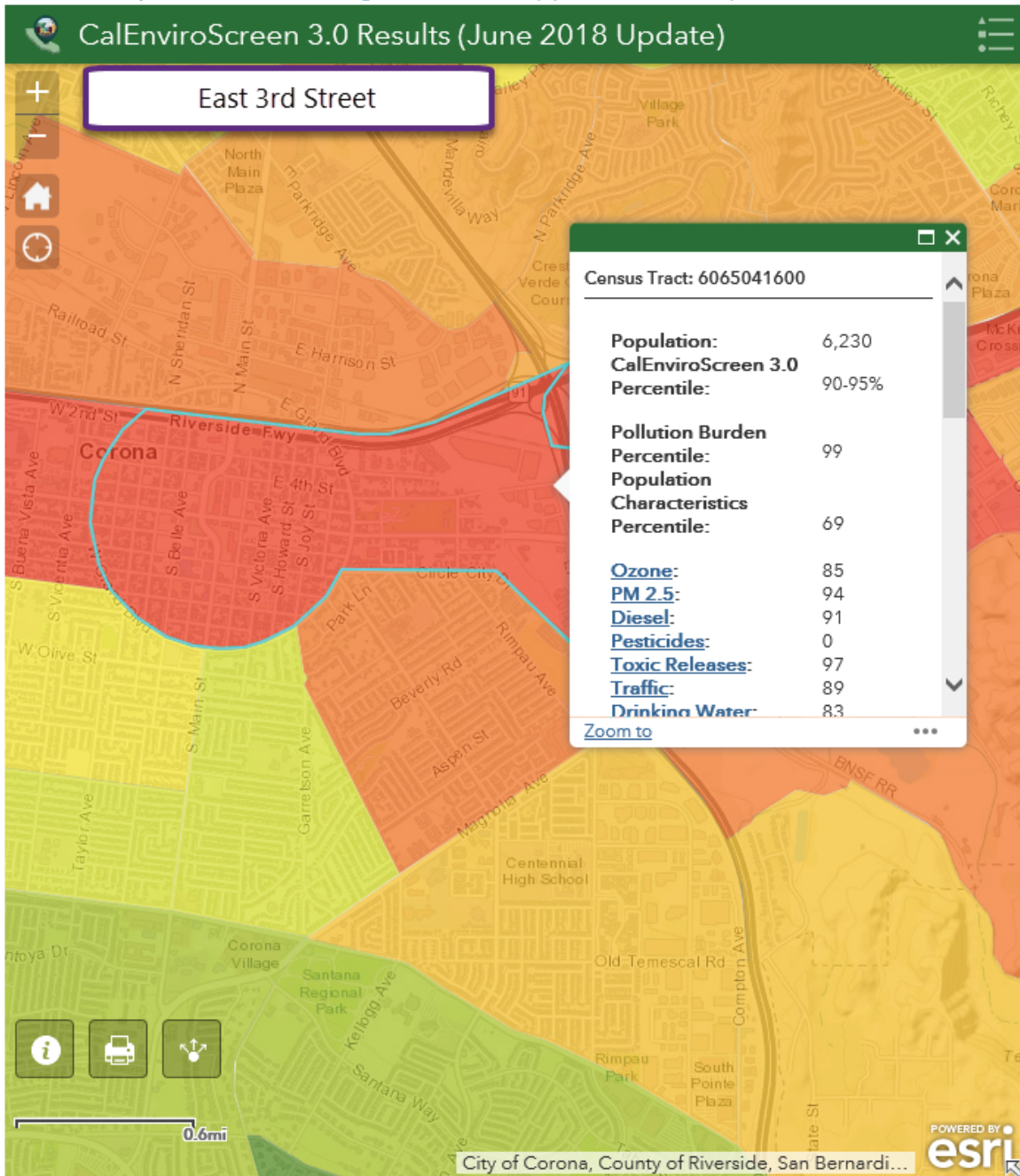
Disadvantaged Communities Map

Disadvantaged communities are defined as the top 25% scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations. More information can be found in CalEPA's [report on Designation of Disadvantaged Communities](#).

[Click to open this map in a new window](#)



Note: The map of SB535 disadvantaged communities (updated June 2018) can be found [here](#).



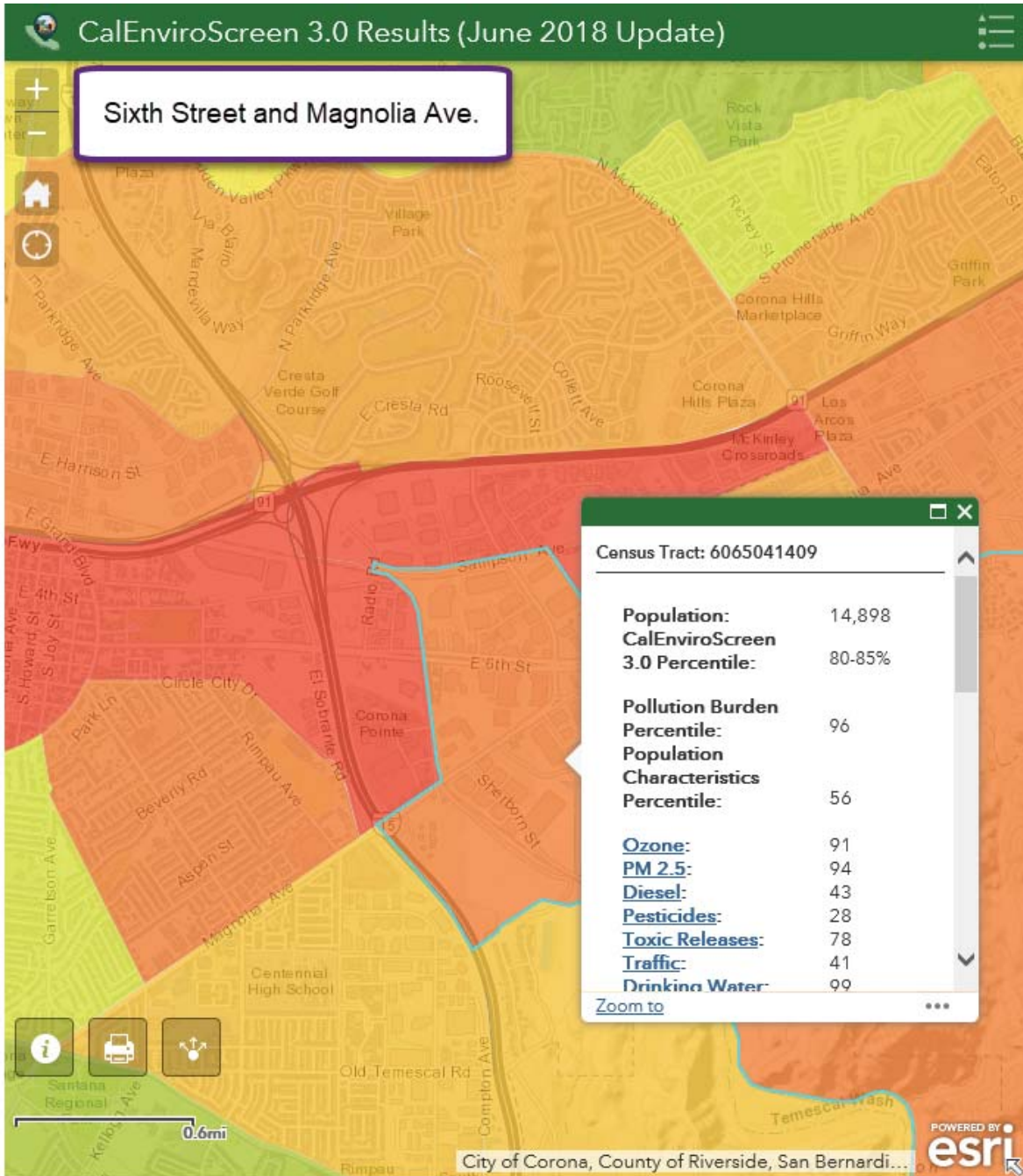


Exhibit B

City of Corona Comments on CCP DEIR



Exhibit C

City of Corona Comments on CCP DEIR



Exhibit D

City of Corona Comments on CCP DEIR



Exhibit E

City of Corona Comments on CCP DEIR

Visibility Comparison of Visual Simulation and Actual LWS Poles

Figure 4.1-10 Visual Simulation



Actual Grey LWS Poles (Image 5)



3.2.16 Letter A16 – Responses to Comments from City of Corona (BBSW, P.C.)

- A16-1 The comment is an introductory statement that indicates the City of Corona is submitting comments on the Draft EIR and also describes the electric utility jurisdictions in the City. Comment noted.
- A16-2 The comment expresses support for the Draft EIR’s Project objectives and the identified environmentally superior alternative for the Distribution Service Objective, but also indicates that the City of Corona has identified a number of opportunities for improvement and has four suggested modifications to the Draft EIR to reduce environmental impacts. Responses to those suggestions are presented below.
- A16-3 An analysis of “Environmental Justice” is typically based upon analysis of impacts to low-income and minority populations. CEQA Guidelines Section 15131 explains that it is not the purpose of CEQA to analyze social and economic considerations. See response to Comment A16-19, where this request is made with more specificity and more substantive issues are addressed. Also note that it does not appear that the City of Corona has prepared environmental justice analyses for its EIRs. (See approved City of Corona Arantine Hills Specific Plan EIR (2013), the 2016 Arantine Hills Supplemental EIR, or the 2018 Arantine Hills Addendum,¹ see also City of Corona Skyline Heights Draft EIR.²)
1. <https://www.coronaca.gov/home/showdocument?id=4595> (2013 EIR), and <https://www.coronaca.gov/home/showdocument?id=1380> (2016 Supplemental EIR), <https://www.coronaca.gov/home/showdocument?id=13413> (2018 Addendum)
 2. <https://www.coronaca.gov/home/showdocument?id=1864> (Skyline Heights EIR)
- A16-4 Refer to response to Comment A16-20, where this request is made with more specificity and more substantive issues are addressed.
- A16-5 The comment requests that the Draft EIR be modified to conclude that the proposed Project and Alternative C1 would result in a significant aesthetics impact. See responses to Comments A16-21 through A16-34, where this issue is addressed with more substantive responses to comments.
- A16-6 The comment requests that the Draft EIR be modified to require that the River Road section of the proposed Mira Loma-Jefferson Subtransmission line be wholly or partially undergrounded. See Responses to Comments A16-21 through A16-34, below. Please also see Master Response 1: Underground versus Overhead Subtransmission Lines.

- A16-7 The commenter concurs with the Draft EIR Project objectives. For minor revisions that have been made to the Distribution Service Objective, refer to Chapter 1, Introduction, in Final EIR Chapter 4, Revisions to the Draft EIR.
- A16-8 The comment is an expression of support for the Draft EIR's Project objectives. Comment noted.
- A16-9 The comment is a summary of the part of the proposed Mira Loma-Jefferson Subtransmission Line that would be constructed within the City of Corona. The comment is acknowledged.
- A16-10 The comment is a summary of the proposed Circle City Substation and its source lines that would be constructed within the City of Corona. The comment is acknowledged.
- A16-11 The comment offers support for the Draft EIR's Project objectives. Comment noted.
- A16-12 The comment offers support for the Draft EIR's identification of Alternative D1 as the environmental superior alternative for the Distribution Service Objective. Comment noted.
- A16-13 The commenter notes that implementation of Alternative D1 would eliminate the need for the proposed Circle City Substation source lines because the battery storage facility would connect directly to nearby distribution circuits. Comment acknowledged.
- A16-14 The comment offers support for Alternative D1 because it would reduce environmental impacts associated with the proposed Project. Comment acknowledged.
- A16-15 The comment summarizes the significant aesthetics impacts identified in the Draft EIR that would be associated with the proposed Pedley Source Lines and Databank Source Lines. The commenter's summary is generally accurate, with the exception that the aesthetic impacts along East 6th Street would be associated with the Pedley Source Lines, not the Databank Source Lines.
- A16-16 Aesthetic impacts that would occur along 3rd Street that would be associated with the proposed Pedley Source Lines are identified in the Draft EIR in the seventh and eighth paragraphs of the aesthetics Impact 4.1-3, *Operation of the Project could substantially degrade the existing visual character or quality of the site and its surroundings*. As stated at the end of the eighth paragraph, since visual sensitivity would be moderate and the level of visual change associated with this portion of the Project would be moderate, impacts to the visual character of the area would be less than significant. Disagreement with the CPUC's conclusions does not make the EIR inadequate. The CPUC notes the point of disagreement.

- A16-17 As acknowledged in the second paragraph of Draft EIR aesthetics section 4.1.5.3, *Distribution Service Objective Alternatives*, views of the Alternative D1 battery storage facility from local roadways would generally be less pronounced than views of the proposed substation given the reduced height of the facilities compared to the height of the proposed substation facilities, and the impact of those views would be less than significant.
- A16-18 It is acknowledged that the proposed Pedley Source Lines and Databank Source Lines would result in significant noise and air quality construction-related impacts that would be avoided under Alternative D1 as disclosed in Draft EIR air quality and noise Sections 4.3.5.3 and 4.13.5.3, respectively. However, as disclosed in Draft EIR transportation and traffic Section 4.17.4, Project construction-related traffic impacts that would be associated with the proposed source lines would result in either potentially significant impacts that would be reduced to less than significant with mitigation, or less than significant impacts. Although the CPUC does not agree that construction-related traffic impacts associated with the proposed source lines would be significant. The CPUC notes the commenter’s disagreement.
- A16-19 Draft EIR environmental justice Section 7.4.1, *Regulatory Background*, provides the regulatory background for the consideration of environmental justice, and references and summarizes the 2012 Attorney General fact sheet mentioned in the comment. Draft EIR Section 7.4.2.1, *Impacts on Sensitive Receptors and Cumulative Environmental Burdens*, indicates where in the Draft EIR considerations regarding sensitive receptors and cumulative environmental burdens are addressed in detail, in compliance with the opinions stated in that fact sheet.

The CPUC acknowledges the status of census tracts 6065041600 (416) and 6065041409 (414.09) in the City of Corona as Disadvantaged Communities (DACs) under the definition provided in Senate Bill (SB) 535 (De León, “California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Fund”) and as identified by CalEPA’s CalEnviroScreen 3.0 tool (CalEPA and OEHHA, 2014, 2017). The purpose of SB 535 is to ensure that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to DACs. The CalEnviroScreen tool is not intended to replace the cumulative impacts analysis required under CEQA, and is not directly relevant to CEQA analysis. Further, the proposed Project has no relation to the generation or use of proceeds from the Greenhouse Gas Reduction Fund.

The Draft EIR identifies appropriate CEQA baseline information regarding existing pollution, hazards, and noise in the relevant sections of Chapter 4; this information is consistent with, but not directly related to, the CalEnviroScreen 3.0 scores for these environmental burdens in Corona. Accordingly, the impact analysis for the proposed Project and alternatives is based on an understanding of existing conditions that acknowledges these existing burdens. For example, see Section 4.13.1.2, *Existing*

Ambient Noise Environment. Additionally, the Draft EIR adequately analyzes cumulative impacts that would result from the proposed Project and alternatives when considered in light of other past, present, and reasonably foreseeable future projects, where existing conditions (or environmental burdens) reflect the contributions of past projects (see Draft EIR Section 6.1, *Projects Considered in the Cumulative Analysis*).

The CPUC acknowledges the City of Corona's support for Alternative D1 for the reasons provided in the comment letter. Draft EIR Section 7.4.2.1, *Impacts on Sensitive Receptors and Cumulative Environmental Burdens*, has been revised in the Final EIR, as discussed below, to include a comparative discussion of the impacts of alternatives to the Project. However, the comment letter's discussion of potential Project impacts on new economic development growth, and property values are both speculative and outside the scope of the CEQA analysis. Therefore, such discussion has not been added to the Draft EIR (also see Master Response 2: Non-CEQA Issues regarding CEQA reviews and property values). Additionally, because the socioeconomic component of the identification of DACs is not relevant to the CEQA analysis, and the physical environmental component is already addressed appropriately throughout the Draft EIR, no discussion of DACs or SB 535 has been added.

Additional revisions to Draft EIR environmental justice Section 7.4.2.1 have been included in the Final EIR. These revisions incorporate a summary of the alternatives impact analyses in Chapter 4 resource sections into Section 7.4.2.1; no new information is added to the Final EIR that was not previously disclosed in the Draft EIR. Refer to the revisions to *Chapter 3, Project Alternatives*, in Final EIR Chapter 4, *Revisions to the Draft EIR*, for the updated Figure 3-2b.

- A16-20 SCE has clarified that it would construct a minimum 8-foot-tall, tan-colored wall around the battery storage facility associated with Alternative D1, similar to that SCE proposed for the Circle City Substation site in the event that Alternative D1 is selected as part of the approved project (SCE, 2018a). However, as described in Draft EIR project alternatives Section 3.4.4.1, *Alternative D1: 12 kV Distribution-Level Battery Storage*, Alternative D1 would not result in significant aesthetics or noise impacts; therefore, the suggestions to add trees and/or native vegetation would not reduce or avoid a significant impact and not considered mitigation under CEQA for Alternative D1. Nevertheless, the commenter's suggestion is noted and would be included for consideration by the applicant and CPUC. Draft EIR project alternatives Section 3.4.4.1 has been revised as shown below.

The Alternative D1 battery storage facility site would be immediately northwest of and adjacent to the proposed Circle City Substation site on the same property along Leeson Lane (refer to **Figure 3-3**, *Alternative D1: 12 kV Distribution-Level Battery Storage Conceptual Layout*). The ~~fenced-walled~~ area of the site would be up to 2 acres. The batteries would be contained in up

to ten pad mounted 53-foot by 8-foot enclosures that would be 9 feet and 7 inches tall (plus a 2-foot pedestal) organized in four battery storage systems on the site. Battery Storage Systems 1 and 2 would be on the west side of the site and Battery Storage Systems 3 and 4 would be on the east side of the site. Each battery storage system would have two to three battery storage enclosures, a 12-foot-tall pad-mounted inverter, 6-foot 10-inch pad-mounted transformers, 9-foot-tall switchgear, a 6-foot 10-inch communications cabinet, and an auxiliary panel (refer to **Figure 3-4, Alternative D1: 12 kV Distribution-Level Battery Storage Alternative Conceptual Plot Plan**). The site would be accessed by a 26-foot-wide driveway from Leeson Lane that would enter the site from the northeast. The site would be secured with an at least 8-foot-high chain link fence-tan-colored wall similar to that SCE has proposed for the Circle City Substation site and 26-foot-wide sliding gate for driveway access.

- A16-21 The comment expresses the City of Corona’s disappointment that the Draft EIR does not identify significant aesthetics impacts along the River Road segment of the proposed Mira Loma-Jefferson subtransmission line. The Mira Loma-Jefferson 66 kV Subtransmission Line discussion in Draft EIR aesthetics Impact 4.1-3, acknowledges changes to existing aesthetic conditions in this area, but concludes that they would not result in a substantial degradation and would therefore not result in a significant impact. This approach is consistent with CEQA. (See *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 899 [“A less than significant impact does not necessarily mean no impact at all.”].) For responses to the City’s individual comments regarding the aesthetic impacts associated with the proposed Mira Loma-Jefferson subtransmission line, refer to response to Comments A16-23 through A16-35.

The comment correctly notes that Alternative C1 is identical to the proposed Project regarding the portion of the proposed Mira Loma-Jefferson subtransmission line that would be located within the City of Corona.

- A16-22 The comment describes the existing and proposed subtransmission line and poles along River Road; no response required.
- A16-23 The commenter requests analysis of additional viewpoints. As discussed under CEQA Guidelines Section 15204(a), “reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.” As also noted under CEQA Guidelines Section 15151, “an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of the EIR is reviewed in light of what is reasonably feasible.”

The proposed Project includes approximately 15.6 miles of subtransmission and source lines. Consistent with the CEQA Guidelines referenced above, the CPUC selected key observation points that are representative of the surroundings, as outlined in greater detail below. However, given the 15.6-mile geographic scope of the subtransmission and source line components of the Project, it is not reasonably feasible to provide visual simulations for multiple poles located within a one-block area (approximately 0.25 miles).

The Draft EIR acknowledges schools and recreational uses in the Project area. For example, the second paragraph of the *Mira Loma-Jefferson 66 kV Subtransmission Line (Photographs 21 through 38)* discussion in Draft EIR Section 4.1.1.2, *Existing Visual Quality of the Region*, expressly notes that “Auburndale Intermediate School, which is shown in photograph 27, also has open views toward the proposed Mira Loma-Jefferson Subtransmission Line (see Figure 4.1-4n).” (See also Section 4.1.1.3 noting “recreational users”].) Furthermore, the YMCA and the George Washington Elementary School are located immediately adjacent to the Auburndale Intermediate School (although George Washington Elementary is located further away from the proposed project’s alignment).

As stated in third paragraph of Draft EIR aesthetics Section 4.1.2.2, *Visual Simulations*, “The simulation images portray the location, scale, and appearance of the Project as seen from publicly accessible KOPs within the Project area. The key observation points (KOP) locations were selected *to represent views seen by the largest number of viewers, primarily within residential or public recreation areas and along scenic routes or other public roadways.*” (Emphasis added.)

The visual simulation shown in Draft EIR Figure 4.1-10 was chosen because it depicts the proposed Project from an outdoor public park and would be directly visible from users of the park (River Road Park). The KOP in this figure is intended to be representative of views of the proposed Project in the area of River Road. The comment is correct that the proposed Project would also be visible from the schools and YMCA located further down River Road. However, all three facilities are within 0.5-mile of the KOP depicted in Figure 4.1-10. The visual sensitivity of viewers from these facilities would be similar to those from River Road Park (moderate to high) and the overall visual change would also be similar (low to moderate). Therefore, since the visual impact would be similar to that shown in Figure 4.1-10 for these locations, resulting in a less-than-significant impact, the CPUC disagrees with the City that the aesthetic impact analysis determination associated with the Project along River Road is in error.

The comment focuses exclusively upon the increased height of the subtransmission line and ignores the other aspects of the aesthetics analysis. More specifically, “The lighter color and simpler form of the new poles would be less noticeable against the sky when compared with the existing reddish-brown colored poles. The new poles more closely resemble the color of existing streetlights, resulting in a more unified

streetscape.” (See the fourth paragraph of the *Mira Loma-Jefferson 66 kV Subtransmission Line* discussion in Draft EIR aesthetics Impact 4.1-3,)

- A16-24 Please see Response to Comment A16-23. Furthermore, the Draft EIR expressly noted that it assumed the visual sensitivity was “Moderate to High” for uses along River Road (see Draft EIR Table 4.1-3). The uses referenced by the commenter were represented by the visual sensitivity of the Park/Recreation uses in these tables. Furthermore, the schools do not rise to the same level of visual sensitivity, as these are focused upon educational activities, with intermittent outdoor recreation. (Draft EIR
- A16-25 The comment indicates that use of the visual simulation included in Draft EIR Figure 4.1-10 is problematic. The commenter elaborates on this point in Comments A16-26 through A16-31. See responses to Comments A16-23, and A16-26 through A16-31.
- A16-26 The CPUC disagrees that the visual simulation in Draft EIR Figure 4.1-10 is misleading. Due to the location of both the existing poles and proposed poles relative to the angle of the sun when the existing photograph was taken, as shown in Draft EIR Figure 4.1-10, shadows from the existing and proposed poles fall to the right of the pole locations (i.e. away from the street) and would not be prominently visible from the photo viewpoint due to the wall and fencing on the east side of River Road. However, because the color of the existing streetlight and proposed poles are similar, the shadowing to the right of those structures is also similar. The existing wood poles are shown with greater contrast to the blue sky due to their darker color. Shadows do not play a predominant role in this visual character analysis because (1) shadows are currently associated with the existing poles (the increased height would only slightly affect the duration of a shadow), (2) shadows typically do not play a large role in a visual character analysis. This is also generally consistent with the City of Corona’s own EIR aesthetic analyses.

The EIRs prepared and certified by the City of Corona follow similar aesthetic methodology. More specifically, the visual character analysis for the City of Corona’s Arantine Hills Specific Plan EIR concluded that impacts to visual character would be less than significant despite development of up to 1,621 residential units, 745,300 square feet of commercial/industrial space, including structures up to 70 feet high in an area described as “currently undeveloped and previously supported a citrus orchard.” (City of Corona Arantine Hills Specific Plan Draft EIR, page 4.1-19.)

City of Corona Arantine Hills Specific Plan EIR (2013): <https://www.coronaca.gov/home/showdocument?id=4595>

- A16-27 The comment states that the lightweight steel poles presented in the visual simulation of Figure 4.1-10 would stand out from the background far more than the

figure suggests. The comment also includes an image of existing poles along Railroad Street. Please see Response to Comment A16-30.

- A16-28 The comment consists of an image of existing poles near the intersection of Railroad Street and Cota Street; no response required.
- A16-29 The comment consists of an image of existing poles along Railroad Street; no response required.
- A16-30 As noted in the fourth paragraph of the *Mira Loma-Jefferson 66 kV Subtransmission Line* discussion in Draft EIR aesthetics Impact 4.1-3, the proposed poles shown in Figure 4.1-10 “would be less noticeable against the sky when compared with the existing reddish-brown colored poles.” While the new proposed poles would be taller than the existing poles, the new poles would carry the same number of lines as the existing poles. Same as the existing poles, the new poles would include a double-circuit configuration with underbuilt distribution and telephone lines. The level of visual change attributable to the proposed Project along River Road is more appropriately shown by a direct comparison of the existing lines with the simulation of the proposed lines, as provided in Figure 4.1-10, rather than a comparison to a photograph of a different line segment along Railroad Avenue under different lighting conditions and from a different viewing angle.
- A16-31 Alternative C1 has not been changed to have all of the existing lines and the proposed Mira Loma-Jefferson subtransmission line installed underground along River Road because a Project-related significant aesthetics impact along this segment has not been identified. Therefore, there is no nexus to change Alternative C1 as requested; however, same as the Project, Alternative C1 includes undergrounding the existing 33 kV distribution circuit along River Road between Corydon Avenue and North Cota Street. Refer to responses to Comments A16-23, A16-24, and A16-30. Also see Master Response 1: Underground versus Overhead Subtransmission Lines.
- A16-32 The comment requests that at a minimum Alternative C1 be modified to require that the section of the proposed Mira Loma-Jefferson subtransmission line along River Road between Second Street and North Lincoln Avenue be undergrounded. Please see Responses to Comments A16-23, A20-30, and A16-31 as well as Master Response 1: Underground versus Overhead Subtransmission Lines. In exercising its discretion to approve or deny the Project, the Commission will consider and evaluate all relevant evidence in the administrative record during the Formal Proceeding process for Application A.15-12-007, including all of the alternatives presented in the Draft EIR and factors warranting adoption of those alternatives, or potential modification of those alternatives.
- A16-33 The comment requests that Alternative C1 also be modified to require that the other sections of the proposed Mira Loma-Jefferson subtransmission line located on River Road north of Second Street and south of North Lincoln Avenue use poles no taller than 60 feet in order to reduce the overall aesthetic impact. As noted in the

fourth paragraph of the *Mira Loma-Jefferson 66 kV Subtransmission Line* discussion in Draft EIR aesthetics Impact 4.1-3, the visual impact that would be associated with the proposed Project along River Road was determined to be less than significant. Therefore, the suggested change to Alternative C1 is not necessary to reduce a significant impact to a less-than-significant level. However, as noted above in Response to Comment A16-32, the Commission retains the discretion to modify alternatives as part of the Formal Proceeding process for Application A.15-12-007 to approve or deny the Project.

A16-34 The comment requests that Alternative C1 also be modified to require that all the existing distribution and telecommunication lines along River Road be undergrounded. As stated in the fourth paragraph of the *Mira Loma-Jefferson 66 kV Subtransmission Line* discussion in Draft EIR aesthetics Impact 4.1-3As n, the visual impact that would be associated with the proposed Project along River Road was determined to be less than significant. Furthermore, the existing telecommunications and distribution lines are part of the baseline conditions and transferring these lines to the proposed LWS poles would result in a minor change relative to the baseline conditions, Therefore, the suggested change to Alternative C1 is not necessary to reduce a significant impact to a less than significant level. However, as noted above in Response to Comment A16-32, the Commission retains the discretion to modify alternatives as part of the Formal Proceeding process for Application A.15-12-007 to approve or deny the Project.

A16-35 The comment is a closing statement that requests modifications to the Draft EIR, as requested in the other comments, be included in the Final EIR. As described in responses to Comments A16-21 through A16-34, the requested revisions to the Draft EIR are not warranted and are not included in the Final EIR.

Comment Letter A17



Corona Chamber of Commerce
904 E.6th St. | Corona, CA 92879
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July 20, 2018

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Petaluma, CA 94954

SUBJECT: COMMENTS ON THE DEIR FOR THE CIRCLE CITY PROJECT (APPLICATION 15-12-007)

The purpose of this correspondence is to provide comments on the Draft Environmental Impact Report ("DEIR") for Southern California Edison's proposed Circle City Project (Application 15-12-007) ("Project") **and to register my strong support for Alternative D1 as the environmentally superior alternative for the Project.**

Support for Alternative D1 is based on the following:

- Alternative D1, which will be less damaging and intrusive, will still satisfy the Project objectives articulated in the DEIR.
- With the elimination of the Pedley and Databank Source Lines, Alternative D1 will diminish the substantial negative aesthetic impacts that the Project would have on the community. The elimination of the 24 poles along East 3rd Street and the installation of a battery storage facility with a much smaller footprint than the proposed Circle City Substation, would considerably reduce the Project's impact on the visual character of our community.
- The elimination of the Pedley and Databank Source Lines would also eliminate the need for major construction along Sixth Street and Magnolia Avenue, two heavily traveled thoroughfares within the City.
- Perhaps most importantly, Alternative D1 would help address the community's significant concern that the Project unfairly imposes substantial environmental impacts on one of the most disadvantaged areas of our community. The proposed Project would place significant air quality, noise, traffic and aesthetic burdens on sensitive populations in the City that are already experiencing adverse effects. The proposed Project could reduce property values in the area and obstruct opportunities for new development and economic growth. Alternative D1 eliminates these impacts.

Additionally, the Commission should require SCE to install similar tan colored walls or other aesthetic measures to shield the battery installation proposed as part of Alternative D1 from public view and to plant trees and other native vegetation in the area to further reduce aesthetic and noise impacts.

Finally, I urge the Commission to require that the Mira-Loma Jefferson Subtransmission Line along River Road be installed underground.

Signed,

John Weyhgandt, Chairman of the Board

Dean Seif, Legislative Action Chairman

Via email: CircleCityEIR@esassoc.com

The Corona Chamber of Commerce is proud to be the recipient of the California Chamber of Commerce Presidents' Award (2010-2015, 2017-2018)

A17-1

A17-2

A17-3

A17-4

A17-5

A17-6

A17-7

A17-8

3.2.17 Letter A17 – Responses to Comments from Corona Chamber of Commerce

- A17-1 The comment is an introductory statement. No response is necessary.
- A17-2 The comment offers support for Draft EIR Alternative D1. Comment noted.
- A17-3 Refer to response to Comment A16-20.
- A17-4 Comment noted.
- A17-5 For the revised environmental justice discussion associated with the proposed Project, refer to Chapter 7, Other CEQA Considerations in Final EIR Chapter 4, *Revisions to the Draft EIR*.
- A17-6 For discussion of potential Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.
- A17-7 Refer to response to Comment A11-6.
- A17-8 The commenter urges the Commission to require that the Mira Loma-Jefferson subtransmission line be installed underground along River Road. This comment does not address the adequacy of the Draft EIR. The decision to require that the line be installed underground in this segment will be considered by the decision makers before they make a final decision on SCE's application.

EUNICE M. ULLOA
Mayor

TOM HAUGHEY
Mayor Pro Tem



EARL C. ELROD
GARY GEORGE
PAUL A. RODRIGUEZ, Ed.D.
Council Members

MATTHEW C. BALLANTYNE
City Manager

CITY of CHINO

July 20, 2018

Mr. Robert Peterson
Circle City Project
c/o Matthew Fagundes, Environmental Science Associates
1425 N. McDowell Blvd, Ste 200
Petaluma, CA 94954

Re: Notice of Availability of a Draft EIR: Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

Dear Mr. Peterson:

This letter is in response to the letter the City of Chino received on June 4, 2018 related to the Notice of Availability of a draft EIR for the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project.

A18-1

Outlined below are our comments:

1. The project proposes to install/relocate SCE infrastructure (poles, vaults, underground conduit, etc.) along the west side of Hellman, south of Pine/Schleisman Avenue within the Preserve Specific Plan area of the City of Chino. This area is designated for future residential development. Provide information on how this project won't impact future/existing access to property owners and developers in the area. Additionally, provide details on the locations of poles and equipment related to the ultimate improvements along Hellman Avenue.

A18-2

A18-3

2. Page 2-29: A approximate 5 acre staging yard (#4) is proposed to be located on a property adjacent to Hellman Avenue. It is unclear where the proposed yard would be located. A temporary construction yard may require the approval of an Administrative Application depending on its location and distance from the project area. Additionally any staging yards in this area could have potential impacts on future development and impacts to local traffic.

A18-4

3. Page 2-43: Indicates that vaults will be installed in various locations along the route. Provide details on how vaults will be designed to able to be lowered if located within future roadways. Also, vaults should be located outside of future driveways, streets, landscaped areas, etc. as to not impact future developments, primarily along the west side of Hellman Avenue.

A18-5

4. Add a photo(s) on Hellman Avenue looking south from Pine Avenue to provide clearer representation of the existing condition in the area.

A18-6



Comment Letter A18

5. Page 4.1-31 indicates that the Subtransmission Line would travel 5 miles on the western edge of the City of Eastvale. The plans indicate that the Mira-Loma Jefferson Subtransmission line would travel north on the westside of Hellman Avenue in the City of Chino and cross the street at Pine/Schleisman Avenue. Please revise accordingly. A18-7
6. Provide photo simulation looking south along Hellman Avenue for the ultimate design on the west side of Hellman Avenue in the City of Chino. A18-8
7. Page 4.1-50 discuss the use of staging yards. See comment 2 above. A18-9
8. Pages 4.11-9/10 Indicate the incorrect land use designations. The southwest corner of Pine and Hellman Avenues is no longer designated as NC-Neighborhood Commercial (General Plan)/CN-Neighborhood Commercial (Zoning). The corners current land use designation is MDR-Medium Density Residential (both General Plan). See the current General Plan map on the City of Chino's website. A18-10
9. Page 4.11-14 the City of Chino General Plan section indicates that the project will be with "Agriculture, Neighborhood Commercial and Open Space". It does not mention that it is adjacent to existing and future residential land uses. Additionally, the section should be revised to reflect comment 8 above. A18-11
10. Page 4.16-2 The list may not contain all of the parks in the vicinity, particularly those in the Preserve Specific Plan areas. It also does not include the location of future parks which are shown in the Preserve Specific Plan. Please coordinate with the City, the Master Developer on the location of all existing and future parks that are within 1 mile of the project area. A18-12
11. Sections 2.5-2.6 – There should be a description in this section about how the location of these proposed facilities shall not interfere with the City's ability to do any street widening in the future. Please refer to the ultimate street sections shown in the Preserve Specific Plan Roadway Sections D, E1, E2, and H. Design plans for these proposed facilities should be forwarded to the City for review and comment when available. A18-13

If you have any questions, please contact me by email at kle@cityofchino.org, or you can call me at (909) 334-3330.

Sincerely,



Kim Le
Associate Planner

cc: Michael Hitz, Principal Planner
Michael Bhatanawin, Associate Engineer

3.2.18 Letter A18 – Responses to Comments from City of Chino

- A18-1 The comment is an introductory statement. No response is necessary.
- A18-2 Residential development and public utility infrastructure has been developed on numerous overlapping sites throughout the state of California. Prior to placement of poles and other infrastructure, SCE would conduct final engineering, including an evaluation of existing and approved features along the Hellman Avenue right-of-way, including but not limited to, existing and planned drive ways, street light poles, underground utilities, and other features. Exact pole locations would be planned to minimize any conflict with these features (SCE, 2018b). This is consistent with Corona’s EIR, which expressly stated that “The increased level of service to the project area will require implementation of new [electrical] service lines and support facilities... The City will provide Southern California Edison with copies of any City Council-adopted plans for Subarea 2, and will coordinate with Southern California Edison Company to identify specific facilities required related to costs, and responsibility for finalizing of services.” (City of Corona Preserve Specific Plan EIR, Section 5.12.) Furthermore, the purpose of CEQA is to analyze impacts to existing conditions, not hypothetical future conditions. (CEQA Guidelines §§ 15125 and 15126.2.)
- A18-3 The proposed poles along Hellman Avenue would be placed within approximately 5 to 15 feet of the existing poles (the majority being on the lower side of the range), and installed approximately 1.5 feet behind the street curb face. The exact location of the poles to be constructed would be determined during final engineering of the Project (SCE, 2018b). The proposed underground vault for the existing Archibald-Chino-Corona 66 kV line in Hellman Avenue would be located approximately 350 feet south of Outback Way adjacent to the center line in the north bound lane of the roadway (SCE, 2018b).
- A18-4 Refer to Draft EIR Figure 2-9, *Potential Staging Yard Locations*, for the mapped location of the proposed potential staging yard on the Hellman Avenue property. As stated in Draft EIR introduction Section 1.4.2, *Other Agencies*, SCE would not be required to obtain local discretionary (e.g., use) permits since the CPUC has preemptive jurisdiction over the construction, operation, and maintenance of SCE facilities in California; however, SCE would still have to obtain all ministerial building and encroachment permits from local jurisdictions, and the CPUC’s GO 131-D requires SCE to comply with local building, design, and safety standards to the greatest degree feasible to minimize project conflicts with local conditions. Furthermore, General Order 131-D also states that local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction.”

As stated in Draft EIR proposed project Section 2.6.2, *Staging Yards and Work Areas*, any land that may be disturbed at the staging yard would be restored to near pre-construction conditions or to the landowner's requirements following the completion of construction. Therefore, the staging yard would not be expected to adversely affect future development at the site. For discussion of the local traffic impacts that would result due to construction of the Project, including use of the staging yards, refer to Draft EIR transportation and traffic Impact 4.17-1: Construction could adversely affect traffic and transportation conditions.

While specific entitlements are a separate and distinct issue from CEQA, Staging Yard Number 4 is on land in the City of Chino zoned as agricultural. The City of Chino's Administrative Review process is governed by Municipal Code Section 20.23.120, which states that it is applicable to all land uses "designated with an "A" in Tables...20.07-1. This table of agricultural uses does not include an "A" for utilities.

A18-5 The proposed underground vault in Hellman Avenue would be 10 feet by 20 feet by 9.5 feet and would be placed several feet below existing street grade, and pre-cast vault grade rings would sit above the vault enclosure to place the vault lid to the existing street level. The use of grade rings would provide the ability to adjust the vault lid elevation should the grade be changed in the future within a range of approximately plus or minus 1 foot. It would also be possible to make small adjustments to the installed depth of the vault (deeper or shallower) in order to accommodate future planned adjustments in the street grade, but these adjustments would be limited by the structural capabilities of the vault. The exact locations of the underground facilities (e.g., ducts and vault) would be determined during final engineering, which would include evaluation of existing and approved features along the Hellman Avenue right-of-way, including but not limited to, existing and planned drive ways, street light poles, underground utilities, and other features. Underground facilities would be planned in order to not conflict with these features (SCE, 2018c).

A18-6 The commenter requests additional viewpoints in the Draft EIR aesthetics section. As discussed under CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." As also noted under CEQA Guidelines Section 15151, "an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of the EIR is reviewed in light of what is reasonably feasible."

The proposed Project includes approximately 15.6 miles of subtransmission and source lines. Consistent with the CEQA Guidelines referenced above, the CPUC

selected key observation points, which are representative of the surroundings, as outlined in greater detail below. However, given the 15.6-mile geographic scope of the subtransmission and source line components of the Project, it is not reasonably feasible to provide simulations for multiple poles located within a one block area.

As stated in third paragraph of Draft EIR aesthetics Section 4.1.2.2, *Visual Simulations*, “The simulation images portray the location, scale, and appearance of the Project as seen from publicly accessible KOPs within the Project area. The KOP locations were selected *to represent views seen by the largest number of viewers, primarily within residential or public recreation areas and along scenic routes or other public roadways.*” (Emphasis added.) Photographs 30, 31, and 32 in Draft EIR Figures 4.1-4o and 4.1-4p show existing conditions along Hellman Avenue. Photograph 31, while looking north, includes views of the west side of Hellman Avenue very close to its intersection with Pine Avenue. A new photo to represent existing conditions along Hellman Avenue is not warranted.

- A18-7 The first sentence of the fifth paragraph of the Mira Loma-Jefferson 66 kV Subtransmission Line (Photographs 21 through 38) discussion in Draft EIR aesthetics Section 4.1.1.2, *Existing Visual Quality of the Region*, has been revised as follows to correctly note the local jurisdictions along the proposed alignment.

The proposed subtransmission line would then extend north for approximately 5.2 miles along the ~~western~~ eastern edge of ~~suburban residential areas in the City of Eastvale-Chino~~, and travel north along Hellman Avenue through a mixture of open, agricultural areas and single-family residential neighborhoods before crossing back to the western edge of the City of Corona, as shown in Photographs 30, 31, and 32 (see **Figures 4.1-4o** and **4.1-4p**).

- A18-8 Please see response to Comment A18-6. Although a photo simulation of a view looking south on Hellman Avenue was not included in the Draft EIR, the simulation of Viewpoint 26 shown in Draft EIR aesthetics Figure 4.1-10 is representative of the visual change that would occur along the proposed Mira Loma-Jefferson subtransmission line alignment whereby existing wood poles would be replaced with new light weight steel poles. The inclusion of an additional photo simulation at the requested location would not change the analysis or conclusions of the Draft EIR.

- A18-9 Refer to response to Comment A18-4.

- A18-10 The comment indicates that the Draft EIR includes reference to an incorrect land use designation. The first two sentences in the *City of Chino General Plan* discussion in Draft EIR land use and planning Section 4.11.1.2, *Regulatory Setting*, have been revised as follows to correct this error.

The Mira Loma-Jefferson subtransmission line would cross *Agriculture*-, ~~*Neighborhood Commercial*~~, and *Open Space/Recreation Buffer Trail* land use designations. In addition, it would cross the following residential land

use designations: Medium Density Residential, High Density Residential, Residential Development (RD) 2, RD4.5 and RD8 (City of Chino, 2017 2015a).

The first sentence in the *City of Chino Zoning* discussion in Draft EIR land use and planning Section 4.11.1.2, *Regulatory Setting*, has been revised as follows.

The Mira Loma-Jefferson subtransmission line and the potential staging area site along Hellman Avenue would be located within the following zoning designations in The Preserve Specific Plan area: *Agriculture/Open Space-Natural (AG/OS-N)*, ~~*Neighborhood Commercial (CN)*~~, *Estate Residential Zone (ER)*, *Low Density Residential (LDR)*, and *Medium Density Residential (MDR)* (City of Chino, 2015b).

These revisions do not change the analysis or conclusions in the EIR.

- A18-11 The comment indicates that the Draft EIR does not mention some of the land use designations that the proposed Project alignment passes through. The first sentence in the *City of Chino Zoning* discussion under impact criterion b) in the Draft EIR land use and planning Section 4.11.4, *Impacts and Mitigation Measures*, has been revised as follows to mention all applicable land uses.

The Mira Loma-Jefferson subtransmission line would be located within The Preserve Specific Plan within Medium Density Residential, High Density Residential, Residential Development (RD) 2, RD4.5, RD8, Agriculture, Neighborhood Commercial, and Open Space/Recreation Buffer Trail land use designations.

- A18-12 The comment indicates that all City of Chino parks in the area may not be included in Draft EIR recreation Table 4.16-1, but does not identify any specific parks that should be added to the table. Although there may be other City of Chino parks within 1 mile of the Project in addition to the five listed in Table 4.16-1, adding additional parks to the table would not alter the less-than-significant conclusion for recreation Impact 4.16-1. The proposed Project would not increase the use of existing parks such that substantial physical deterioration would occur or be accelerated. Likewise, the “No Impact” determination would remain unchanged regarding the inclusion of recreational facilities that might have an adverse physical effect on the environment. As discussed in the Draft EIR recreation Section 4.16, operational maintenance activities are not anticipated to adversely change. Existing operational maintenance activities would decrease in certain portions of the proposed Project alignment due to the lower maintenance requirements of the tubular steel poles and light-weight steel (LWS) poles that would replace existing wood and LWS poles along the proposed Mira Loma-Jefferson 66 kV Subtransmission Line in the City of Chino. Furthermore, construction workers are expected to commute from within Riverside and San Bernardino counties rather

than relocate to the Project area, and would not adversely affect recreational facilities.

- A18-13 The following sentence has been added to the last sentence of Draft EIR Project description Section 2.5.2.1, *Overview*, to state that exact pole and infrastructure locations would be planned to minimize any conflict with existing and planned features in the public right-of-way.

Prior to placement of poles and other subtransmission infrastructure, SCE would conduct an evaluation of existing and approved features along the public rights-of-way, including but not limited to, existing and planned drive ways, street light poles, underground utilities, and other features. Exact pole and infrastructure locations would be planned to minimize any conflict with these features.

Chino Preserve Development Corporation

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July 20, 2018

Mr. Robert Peterson Circle City Project
c/o Matthew Fagundes, Environmental Science Associates
1425 N McDowell Blvd, Suite 200
Petaluma, Ca 94954

Via Email CircleCityEIR@esassoc.com

Re: Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project Draft EIR

Dear Mr. Peterson,

Please consider this comment to the Draft EIR (DEIR) prepared for the Circle City Substation and Mira-Loma Jefferson Subtransmission Line Project (Circle City Project). Chino Preserve Development Corporation (CPDC) has substantial land holdings in the City of Chino under development that is impacted by the proposed Circle City Project. CPDC has been working collaboratively with Southern California Edison (SCE) for over 2 years on a proposed relocation of a 66 KV overhead line which crosses CPDC property west of Hellman Avenue. This overhead line is identified in the Circle City Project DEIR as the Archibald-Chino-Corona 66KV Subtransmission line which runs perpendicular to the new Circle City Project line on Hellman Avenue. See attached exhibit showing this location. The Circle City Project will impact CPDC's proposed relocation.

A19-1

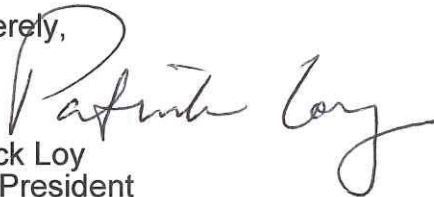
As we understand the proposed Circle City Project, there will be a 420' conversion to underground of a portion of the Archibald-Chino-Corona 66KV Subtransmission Line shown on Figure 2-6 as a 420-Foot Duct Bank. We see an opportunity to consolidate efforts and work cooperatively on our respective projects to the mutual benefit of each project. We request more information on the Circle City Project showing the specific details of the underground relocation and how it impacts CPDC's property frontage on the west side of Hellman Avenue.

A19-2

We appreciate the opportunity to comment on the Circle City Project DEIR. We welcome the opportunity to work collaboratively on these important projects. Please call me with so that we may discuss 909-946-7513.

A19-3

Sincerely,



Patrick Loy
Vice President
Regional Project Manager



SOURCE: SCE, 2015

Circle City Substation and Mira Loma-Jefferson 66 kV Line Project . 207584.14
Figure 2-6
 Mira Loma-Jefferson 66 kV Subtransmission Line Route

3.2.19 Letter A19 – Responses to Comments from Chino Preserve Development Corporation

A19-1 The comment is a summary statement that explains the commenter has land holdings in the City of Chino and states that they would be impacted by the Project and that the commenter has been working collaboratively with SCE regarding the relocation of the Archibald-Chino-Corona subtransmission line west of Hellman Avenue. Comment noted. Also refer to response to Comment A19-2.

A19-2 The comment also asserts that the Project will “impact CPDC’s proposed relocation” of the “Archibald-Chino-Corona 66 KV Subtransmission line.”

Refer to Draft EIR project description Figure 2-15 for additional details regarding the location of the underground re-location of the 420-foot segment of the Archibald-Chino-Corona subtransmission line. The two new light-weight steel (LWS) poles to the northeast and west of the subtransmission line underground crossing represent the endpoints of the underground segment. Prior to placement of those poles and duct bank, SCE would conduct final engineering, including an evaluation of existing and approved features along the Hellman Avenue right-of-way, including but not limited to, existing and planned drive ways, street light poles, underground utilities, and other features. Exact pole and duct bank locations would be planned to minimize any conflict with these features (SCE, 2018b).

A19-3 The comment is a closing statement indicating the Chino Preserve Development Corporation welcomes the opportunity to work collaboratively with SCE on the issues discussed in Comments A19-1 and A19-2.



Tammy Jones, Senior Attorney
Real Property, Local Government
Affairs and Licensing
Tammy.Jones@sce.com

July 20, 2018

VIA E-MAIL AND U.S. MAIL

Mr. Robert Peterson
Circle City Project
c/o Matthew Fagundes, Environmental Science Associates
1425 N. McDowell Blvd., Ste. 200
Petaluma, CA 94954
CircleCityEIR@esassoc.com

RE: Circle City and Mira Loma-Jefferson Project

Re: Southern California Edison’s Comments to the Draft Environmental Impact Report for the Circle City and Mira Loma-Jefferson 66 kV Subtransmission Line Project

Dear Robert:

Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Report (DEIR) published by the California Public Utilities Commission (CPUC) on June 4, 2018. On behalf of Southern California Edison (SCE), the proponent of the Circle City and Mira Loma-Jefferson 66 kV Subtransmission Line Project (Proposed Project) that is the subject of the DEIR, this comment letter and the enclosed table address issues that apply to the entire DEIR, with a primary focus on project objectives and alternatives.

A20-1

While SCE is supportive of battery storage, and is actively pursuing battery energy storage integration into SCE’s system generally, SCE remains concerned that the battery storage solution selected as the Environmentally Superior Alternative (ESA) may not be the appropriate long-term solution, nor is its performance certain for the challenges faced in the Electrical Needs Area (ENA) of the Proposed Project. Rather, SCE maintains that the Proposed Project is the best solution to achieve the project objectives set forth in its Proponents Environmental Assessment (PEA).

A20-2

SCE does support the integration of batteries and other energy storage systems in its service territory where appropriate, and in this particular application, SCE believes the ENA may be able to rely on some type of battery storage solution (the details of which will be resolved in the Formal Proceeding, as stated in the DEIR) through approximately 2031. However, in the specific case of the needs of the ENA of the Proposed Project, SCE believes it is necessary to include the construction of a substation as a designated backup to the integration of batteries in order to satisfy SCE’s stated project objectives and to assure adequate reliability and operational flexibility in both the short term and the long term. Consequently, the Final Environmental Impact Report (FEIR) should move forward Alternative D3 which includes the construction of a substation in the future, in the event the batteries do not perform as needed and/or capacity needs for the ENA exceed the

A20-3

A20-4

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forecasted need. This will ensure SCE can provide reliable electrical service to its customers in the ENA, as well as ensure there is an efficient and streamlined environmental review, and eliminate the need for SCE to refile an application for a substation in the near future, which would only serve to duplicate efforts and expend unnecessary resources. SCE remains confident that SCE’s proposed Circle City Substation provides the greatest operational flexibility and is the most reliable and cost-effective solution, all to the benefit of SCE’s customers. Alternatively, in light of the information provided in this letter, SCE requests that the CPUC prepare a Final EIR that contains an appropriate analysis of the environmental impacts associated with Alternative D3.

A20-4
cont.

I. Overview of SCE’s comments on the DEIR

In particular, this letter explains how: 1) the DEIR erroneously establishes objectives that differ from those advanced by SCE; 2) the Proposed Project is the only proven alternative that meets the objectives of enhancing electrical system reliability and increasing operational flexibility during peak demand conditions; and 3) the DEIR improperly carries through for analysis an alternative that does not reduce significant and unavoidable impacts beyond that of the Proposed Project.

A20-5

First, the DEIR erroneously sets forth objectives for the Project that are different from those established by SCE. Modifying SCE’s asserted Project objectives gives inadequate attention to issues that are critically important to SCE’s provision of electrical service to its customers, including issues that would affect system reliability and operational flexibility.

A20-6

Because the DEIR sets forth different project objectives, a project other than the Proposed Project was found to be the environmentally superior alternative. However, SCE selected the Proposed Project because it is a proven solution that would increase system reliability and operational flexibility, as well as increase capacity at peak demand times. The alternatives set forth in the DEIR may not meet these two primary objectives at all times and to the same extent as the Proposed Project, and accordingly, should be dismissed from further analysis.

A20-7

Finally, the DEIR improperly carries Alternative C3 (66 kV Subtransmission-Level Battery Storage) through for further analysis. Because the DEIR concludes that this alternative would not reduce significant and unavoidable impacts related to air quality and noise beyond that of the Proposed Project, Alternative C3 should not be carried forward in the DEIR.

A20-8

II. Legal Standards Governing The Analysis Of Alternatives In A DEIR

As noted in the DEIR, the California Environmental Quality Act (Pub. Resources Code § 21000 *et seq.*, and its implementing Guidelines (14 CCR § 15000 *et seq.*) require that an EIR describe “a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project...” (14 CCR § 15126.6(a); DEIR, at p. 3-1.)

A20-9

However, an EIR’s treatment of alternatives may be inadequate if the objectives sought to be achieved by the project are not adequately defined. (*City of Santee v. County of San Diego* (1989) 214 Cal. App. 3d 1438, 1455.)

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CEQA does not establish a stringent limitation on the factors which a lead agency may consider when determining whether an alternative is feasible. Rather, CEQA provides that such a decision may rest on “economic, legal, social, technological, or other considerations.” (Pub. Resources Code § 21081 (a)(3).) Similarly, the CEQA Guidelines define “feasible” as: “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” (Pub. Resources Code § 20161.1; 14 CCR § 15364.)

A20-9
cont.

III. The DEIR Erroneously Sets Forth Project Objectives That Are Different From Those Established By SCE.

The PEA submitted by SCE with its Application for a Permit to Construct (PTC) the Proposed Project set forth SCE’s basic Project objectives. (See DEIR, at ES-2.) As originally proposed by SCE, those Project objectives are:

- Serve current and long-term peak electrical demand requirements in the electrical needs area (ENA) as soon as possible after receipt of applicable permits;
- Enhance electrical system reliability by adding transformation and circuitry to serve increased electrical demand and by increasing operational flexibility;
- Construct the new electrical facilities in close proximity to the electrical demand to effectively and efficiently serve the ENA;
- Meet the proposed Project need while minimizing environmental impacts;
- Meet the proposed Project need in a cost-effective manner; and
- Design and construct the proposed Project in conformance with SCE’s current engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects.

A20-10

The DEIR however, substitutes a set of basic project objectives for SCE’s Project objectives. As stated in the DEIR, the purported explanation is that the CPUC “considers these two CEQA objectives to be the underlying purpose for the proposed Project.” (DEIR p. ES-2.) The redefined Project objectives state, in their entirety:

- Subtransmission Service Objective: Maintain electrical system reliability by addressing overloads on the Mira Loma-Corona-Jefferson and Mira Loma-Corona 66 kV subtransmission lines that could occur under peak electrical demand conditions during the 2017 to 2026 forecast period; and
- Distribution Service Objective – Ensure that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.

A20-11

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By eliminating certain fundamental objectives from further consideration in the DEIR, the DEIR fails to capture important factors that SCE took into account in developing the project alternatives and selecting the Proposed Project. Among other things, the revised objectives detract from SCE’s goals of providing for load transfers among various substations within the ENA, minimizing environmental impacts and meeting need in a cost-effective manner. As discussed in further detail below, these revisions result in an analysis which erroneously advances some alternatives ahead of others, even though the alternatives designated as superior: 1) may not be capable of achieving basic and fundamental project objectives to the same extent as the Proposed Project; 2) may not reduce environmental impacts; and 3) may in fact be less cost effective, resulting in higher capital costs over the project lifecycle.

A20-12

As a result, the DEIR favors alternatives that do not appear to be operationally superior to the Proposed Project. SCE’s project objectives therefore should be restored and adopted by the CPUC, and the analysis of alternatives, including Alternative D3, should be revised to discuss whether each alternative in the DEIR could feasibly attain SCE’s project objectives and then accurately identify the environmentally superior alternative.

A20-13

IV. The Circle City Substation, Or In The Alternative, D3, Are The Only Solutions That Provide Operational Flexibility, Reduced Risk, And Reliability In A Cost Effective Manner.

SCE believes the ENA may be able to rely on a battery storage solution through approximately 2031. However, in the specific case of the needs of the ENA of the Proposed Project, it is necessary to include the construction of a substation as a designated backup to the integration of batteries. This is necessary in order to mitigate the uncertainties with the performance of batteries for the specific needs of this project, to satisfy SCE’s stated Project objectives, and to assure adequate reliability and operational flexibility in both the short term and the longer term. SCE remains confident that, of the alternatives considered in the DEIR, SCE’s proposed Circle City Substation, or in the alternative, Alternative D3, are the only solutions that would provide the operational flexibility needed to offload capacity from the other substations in the ENA during peak conditions, add the required additional capacity, and to increase reliability in a cost-effective manner, all to the benefit of SCE’s customers.

A20-14

A. SCE’s Proposed Project provides operational flexibility and enhances the reliability of electrical service to SCE’s customers.

The substation component of SCE’s Proposed Project is designed to not only address the electrical demands within the immediate area surrounding the proposed Circle City Substation, but also to support offsetting load demands from substations adjacent to it as well. Specifically, the proposed Circle City Substation is expected to offset electrical demand by transferring load between and among the adjacent substations. At any given time, the substation would provide sufficient capacity to allow for permanent load transfers to balance loading between the

A20-15

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substations within the Project’s ENA but would also allow for temporary load transfers during planned outages of distribution facilities (*e.g.*, maintenance, repairs, *etc.*), as well as capacity to restore electrical service during unplanned outages of distribution facilities.

↑
A20-15
cont.

The battery solution, identified as the Environmentally Superior Alternative in the DEIR, is unable to perform this reliability function. While batteries are expected to alleviate loads on particular circuits in the ENA, they require downtime to recharge. Unlike a substation where multiple substation sources (*i.e.*, subtransmission lines) provide a constant source of power to the substation allowing it to be available all of the time (increasing reliability and operational flexibility), batteries are unable to alleviate electrical demands outside of the immediate circuits they are connected to, and the existing substation which serves those circuits, nor are they available all of the time. Further, because batteries do not have their own source of constant independent power (*e.g.*, 66 kV source line and 66/12 kV transformers), they are unable to operate and serve load separately from the electrical facilities surrounding them; rather their function would be to *supplement* existing electrical facilities. These shortcomings will become especially important after 2031, or once it is determined that the battery solution can no longer support the ENA. Accordingly, it is imperative that a substation alternative be included in order to provide the operational flexibility SCE needs to balance electrical loads among multiple substations in the ENA, and enhance the reliability of electrical service to SCE’s customers.

A20-16

B. SCE’s Proposed Project Subjects Customers To Less Risk Than The Battery Alternative Included In The ESA.

Based on what is known today, the demands of the ENA for the Proposed Project can be more reliably served through the construction of the proposed Circle City Substation. However, SCE believes an SCE-owned battery storage solution (along the lines of SCE’s analysis as communicated to the CPUC during the discovery process prior to issuance of the DEIR) could provide benefit to the ENA until 2031, and thereby defer construction of a substation, so long as the Circle City Substation, or Alternative D3, is at least considered as a designated backup solution in the event the batteries do not perform as needed and/or capacity needs for the ENA exceed the forecast need.

A20-17

Having a substation as a designated backup is necessary because it inherently entails less risk than the batteries component of the ESA. SCE’s breadth of experience with substations is significant. Substation equipment has a greater life expectancy than batteries and consists of standardized equipment that can be replaced quickly following a failure. Substations are a proven and reliable commodity supporting SCE’s provision of reliable electrical service to its customers.

A20-18

In contrast, it is unknown how the batteries will perform in this application during all of the various system conditions, system configurations, and loading conditions (*e.g.*, prolonged or consecutive heat storms) that may occur and for which SCE has extensive experience addressing with substation facilities. It is also unknown whether the batteries will deliver the MWh of power

A20-19
↓

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anticipated consistently throughout their useful life. Consequently, the battery solution included in the ESA presents a risk to SCE’s ability to provide reliable service to its customers. The risks associated with batteries are only mitigated by SCE’s ability to construct the Circle City Substation in an expeditious manner at some future date should the batteries not perform as anticipated.

A20-19
cont.

Moreover, construction of the substation at a future date would have minimal incremental environmental impacts as a portion of the substation site will already have been graded, *etc.* to accommodate the installation(s) of the battery storage solution as it would only require the installation of additional equipment adjacent to the installed batteries, similar to a substation modification.

A20-20

C. SCE’s Proposed Project presents a more cost-effective solution for SCE’s customers than the battery alternative endorsed by the ESA

Lastly, the proposed Circle City Substation is the most cost-effective solution for SCE’s customers. The costs associated with the repeated prescription of batteries to incrementally address demand over time, along with the anticipated costs to replace the batteries at the end of their useful life, are expected to eventually equal and then surpass the costs of the Substation.

A20-21

Unfortunately for SCE’s customers, at the time when the costs of the batteries may surpass the costs of the Substation, the installed batteries will still only be capable of providing 20 MW of power. This is contrasted against the 72 MW of capacity (the planned operating limit of the two substation transformers that would be initially installed¹) the Circle City Substation will immediately provide. Moreover, while the proposed substation is expected to address all long-term capacity demands of the ENA, the installed batteries may only serve demand for a defined period and will still require the Substation, thus adding additional costs.

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While the construction of the ESA is expected to address the near-term (*i.e.*, 10 year) capacity needs in the ENA, SCE fears that it may do so in a manner which is less reliable and less cost-effective than the proposed Circle City Substation. While SCE expects batteries to complement its provision of reliable electrical service to its customers, SCE asserts that the Circle City Substation as proposed is the better solution in this instance.

V. The DEIR Improperly Carries Alternative C3 Forward In The DEIR For Analysis

Alternative C3 (66 kV Subtransmission-Level Battery Storage) “would involve constructing up to three subtransmission-level (66 kV) battery storage and substation facilities instead of the Mira Loma-Jefferson 66 kV line component of the Project.” It is described in detail on DEIR pgs. 3-17 to 3-20. Evidenced by this description, as well as the environmental analysis of this Alternative C3 at DEIR Sections 4.1 to 4.18 and summarized in Table 5-2, Alternative C3 is

A20-23

¹ PEA at p. 1-9; 3-2.

Robert Peterson c/o Matthew Fagundes
July 20, 2018
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expected to increase significant environmental impacts compared against both SCE’s Proposed Project, as well as the identified environmentally superior project alternative (Alternative C1) with respect to air quality (e.g., VOC emissions), aesthetics, and noise. As such, SCE requests that Alternative C3 be removed from further consideration.

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Further consideration of Alternative C3 is inconsistent with the principles guiding the consideration and discussion of alternatives under the California Environmental Quality Act (CEQA). CEQA clearly provides that the “...discussion of alternatives shall focus on alternatives to the project...*which are capable of avoiding or substantially lessening any significant effects...*” (CEQA Guidelines § 15126.6(b) (emphasis added)). Indeed, “public agencies should not approve projects ... if there are feasible alternatives ...available which would substantially lessen the significant environmental effects of such projects...” (CA. Pub. Res. Code § 21002).

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Because Alternative C3 increases environmental impacts associated with the Project, it should not be considered further. SCE requests that any language in the DEIR referencing “Alternative C3” be revised to make clear that it has not been carried forward for further consideration.

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VI. Conclusion

SCE appreciates the CPUC’s work and the opportunity to provide comments on the DEIR.² SCE looks forward to the CPUC’s preparation of the Final EIR and consideration of approval of the Proposed Project, or in the alternative, Alternative D3.

A20-26

Sincerely,

/s/ Tammy Jones
Tammy Jones

cc: Robert Peterson (CPUC email only)
Michael Bass (SCE email only)

Attachments: 1 (SCE Comments Table)
2 (Telecommunications Route, Map 1)
3 (Telecommunications Route, Map 2)

² SCE’s comments on specific portions of the DEIR are reflected in the comments table in Attachment 1. As shown in that table, SCE’s suggested deletions from the DEIR are shown in ~~strikeout~~ format, and SCE’s suggested additions to the DEIR are shown in underline format.

Attachment 1
SCE Comments Table

Mira Loma-Jefferson 66kV Line and Circle City Substation Project
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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
ES.1	ES-1	At the end of the second paragraph the text states: Therefore, SCE proposes development of a new subtransmission/distribution substation in the City of Corona referred to as Circle City Substation that would address the forecasted electrical maximum operating limit shortfall in the ENA. The proposed Project and alternatives are considered in light of this information.	Please add text regarding the need for the Mira Loma-Jefferson 66 kV Line as follows: Therefore, SCE proposes development of a new subtransmission/distribution substation in the City of Corona referred to as Circle City Substation that would address the forecasted electrical maximum operating limit shortfall in the ENA. <u>SCE also proposes new 66 kV line construction and reconfiguration of the existing Mira Loma-Corona-Jefferson 66 kV Line which would result in the Mira Loma-Jefferson and Mira Loma-Corona #2 66 kV lines to address subtransmission capacity issues. The resulting Mira Loma-Jefferson and Mira Loma-Corona #2 lines are collectively referred to as the Mira Loma-Jefferson 66 kV Subtransmission Line.</u> The proposed Project and alternatives are considered in light of this information.	Proposed edits are intended for technical accuracy and to complete missing information regarding the Mira Loma-Jefferson 66 kV Subtransmission line component of the project.
ES.2	ES-2	The Distribution Service Objective bullet states: Distribution Service Objective - Ensure that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.	Please revise as follows: Distribution Service Objective - <u>Maintain electrical system reliability by ensuring</u> Ensure that the Corona, Jefferson, and Chase substations do not exceed their combined capacity under peak electrical demand conditions through the 2017 to 2026 forecast period <u>and by increasing operational flexibility.</u>	Reliability and operational flexibility must be included as a component of both Project Objectives. Maintaining sufficient capacity to avoid exceeding capacity limits is a component of reliability.
ES.3	ES-2 ES-3	In the third sentence of Project Components section, it states: It would include a steel 66 kV switchrack, two 28 MVA 66/12 kV transformers, a 12 kV low-profile steel switchrack, two 12 kV 4.8 MVA reactive capacitor banks, a prefabricated steel Mechanical and Electrical Equipment Room, a permanent restroom, and a new road providing access from Leeson Lane.	Please revise as follows: It would include a steel 66 kV <u>steel</u> switchrack, two 28 MVA 66/12 kV transformers, a 12 kV low-profile steel switchrack, two 12 kV 4.8 MVA reactive capacitor banks, a prefabricated steel Mechanical and Electrical Equipment Room (<u>MEER</u>), a permanent restroom, and a new road providing access from Leeson Lane.	Proposed edits are intended for clarity as “low profile” pertains to how the electrical rack is designed. The 66 kV rack can be designed as low profile, but 12kV distribution racks are not designed to be low profile. MEER buildings are commonly built from materials other than steel.
ES.4	ES-4	The fourth bullet under Subtransmission Service Objective Alternatives states: Alternative C3: 66 kV Subtransmission-Level Battery Storage.	Please revise as follows: Alternative C3: 66 kV Subtransmission-Level Battery Storage.	SCE suggests that Alternative C3 be removed from further consideration. Alternative C3 is expected to increase significant environmental impacts compared against both SCE’s proposed project, as well as the identified environmentally superior project alternative (Alternative C1) with respect to air quality (e.g., VOC emissions), aesthetics, and noise. Carrying Alternative C3 forward for consideration is

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Mira Loma-Jefferson 66kV Line and Circle City Substation Project
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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
				<p>inconsistent with the purposes of the consideration and discussion of alternatives under CEQA. <i>See CA. Pub. Res. Code § 21002</i> (“...public agencies should not approve projects ... if there are feasible alternatives ...available which would substantially lessen the significant environmental effects of such projects...”); CEQA Guidelines § 15126.6(b) (“...discussion of alternatives shall focus on alternatives to the project...which are capable of avoiding or substantially lessening any significant effects...”).</p> <p>Accordingly, please revise any language in the DEIR referencing “Alternative C3” to make clear that said Alternative has not been carried forward for further consideration.</p>
Table ES-1	ES-7	<p>The third bullet of Mitigation Measure 4.3-2b states:</p> <p>Graded and/or excavated inactive areas of the construction site shall be monitored by SCAQMD air district or approved third party at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust;</p>	<p>Please revise as follows:</p> <p>Graded and/or excavated inactive areas of the construction site shall be monitored by SCAQMD air district or approved third party at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust;</p>	<p>Proposed edits are intended for technical accuracy as SCAQMD does not provide services such as weekly on-site dust monitoring. Further, a monitor hired by SCE can ensure implementation of this measure and provide status reports to the CPUC.</p>
Table ES-1	ES-8	<p>Mitigation Measure 4.3-2b states:</p> <p>Mitigation Measure 4.3-2b: Construction Equipment Exhaust Reductions. For all diesel-fueled off-road construction equipment, SCE shall make a good faith effort to use available construction equipment that meets Tier 4, the highest USEPA-certified tiered emission standard. An Exhaust Emissions Control Plan that identifies each off-road unit’s certified tier specification and Best Available Control Technology (BACT) shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities. Construction activities cannot commence until the Plan has been approved. For all pieces of equipment that would not meet Tier 4 emission standards, the Exhaust Emissions Control Plan shall include recent documentation from at least two local heavy construction equipment rental companies that indicates that the</p>	<p>Please revise as follows:</p> <p>Mitigation Measure 4.3-2b: Construction Equipment Exhaust Reductions. For all diesel-fueled off-road construction equipment, SCE shall make a good faith effort to use available construction equipment that meets Tier 4, the highest USEPA-certified tiered emission standard. An Exhaust Emissions Control Plan that identifies <u>requirements to maintain a log of</u> each off-road unit’s certified tier specification and Best Available Control Technology (BACT) shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities. Construction activities cannot commence until the Plan has been approved. For all pieces of equipment that would not meet Tier 4 emission standards, the Exhaust Emissions Control Plan shall include <u>requirements to provide</u> recent documentation from at least two local heavy construction equipment</p>	<p>Proposed edits are intended for technical accuracy as SCE may not know the exact equipment that will be utilized 30 days prior to commencement of construction activities. SCE will however be capable of maintaining a log of equipment that may be reviewed by the CPUC.</p>

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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
		companies do not have access to higher-tiered equipment for the given class of equipment.	rental companies that indicates that the companies do not have access to higher-tiered equipment for the given class of equipment. <u>SCE shall make available to the CPUC a copy of the certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit for each piece of construction equipment, as applicable, at the time the equipment is mobilized.</u>	
Table ES-1	ES-12 Through ES-13	<p>Mitigation Measure 4.4-3b states:</p> <p>Mitigation Measure 4.4-3b: If vernal pool fairy shrimp or Riverside fairy shrimp are identified in the Project area and impacts to occupied pools cannot be avoided, SCE shall mitigate for impacts to vernal pool fairy shrimp habitat and comply with the requirements of the FESA through one or more of the following steps to provide compensatory habitat: (a) participation in the MSHCP to obtain take coverage for identified species, (b) salvage of cysts and creation of replacement pool habitat in the local area at a replacement ratio of at least 3:1, (c) restoration of affected pools onsite after the completion of construction, or (d) acquisition of credits from an approved mitigation bank within the Project region.</p> <p>If occupied habitat for the above species is encountered at a Project site, to mitigate for temporary or permanent loss of aquatic sites, SCE shall implement the following measures:</p> <ul style="list-style-type: none"> SCE shall mitigate for the loss of branchiopod habitat that will be filled or otherwise directly affected by the project by providing compensatory habitat. SCE shall develop and implement a mitigation, monitoring, and management plan, with input from regulatory agencies that shall outline long-term management strategies and performance standards to be attained to compensate for habitat losses resulting from the project. At a minimum, the plan shall include standards for mitigation site selection and construction specifications for mitigation sites, a description of site conditions including aerial maps, an analysis of local branchiopod habitat, and performance criteria by which site quality can be assessed over time (e.g., size, vegetation species present, date of initial ponding, ponding duration, and wildlife usage). A monitoring program will be established to track the development of habitat conditions that are conducive to the establishment of vernal pool branchiopods. To the greatest practicable extent, SCE or its contractors shall construct compensation habitat (i.e., replacement pools) before habitat disturbances are incurred; or directly within the project 	<p>Please revise as follows:</p> <p>Mitigation Measure 4.4-3b: If vernal pool fairy shrimp or Riverside fairy shrimp are identified in the Project area and impacts to occupied pools cannot be avoided, SCE shall mitigate for impacts to vernal pool fairy shrimp habitat and comply with the requirements of the FESA through one or more of the following steps to provide compensatory habitat: (a) participation in the MSHCP to obtain take coverage for identified species, (b) salvage of cysts and creation of replacement pool habitat in the local area at a replacement ratio of at least 3:1, (c) restoration of affected pools onsite after the completion of construction, or (d) acquisition of credits from an approved mitigation bank within the Project region.</p> <p>If occupied habitat for the above species is encountered at a Project site, to mitigate for temporary or permanent loss of aquatic sites, SCE shall implement the following measures: <u>Compensatory or Restoration</u></p> <ul style="list-style-type: none"> SCE shall mitigate for the loss of branchiopod habitat that will be filled or otherwise directly affected by the project by providing compensatory habitat; <u>or</u>, SCE shall develop and implement a mitigation, monitoring, and management plan, with input from regulatory agencies that shall outline long-term management strategies and performance standards to be attained to compensate for habitat losses resulting from the project. At a minimum, the plan shall include standards for mitigation site selection and construction specifications for mitigation sites, a description of site conditions including aerial maps, an analysis of local branchiopod habitat, and performance criteria by which site quality can be assessed over time (e.g., size, vegetation species present, date of initial ponding, ponding duration, and wildlife usage). A monitoring program will be established to track the development of habitat conditions that are conducive to the establishment of vernal pool branchiopods. To the greatest practicable extent, SCE or its contractors shall construct compensation habitat (i.e., replacement pools) before 	<p>Proposed edits are intended for technical accuracy and to clarify the requirements listed in the bullets between construction activities and compensation activities. Further, it appeared that both onsite restoration and compensatory mitigation would be required.</p>

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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
		<p>footprint after construction. A qualified biologist shall ensure that ponds are functioning as designed.</p> <ul style="list-style-type: none"> SCE shall submit the name and credentials of a biologist qualified to act as construction monitor to USFWS for approval at least 15 days before construction work begins. With concurrence from the USFWS, a USFWS-approved biologist shall salvage soils from sites that are known to support vernal pool branchiopods at least 2 weeks before the onset of construction, or during the preceding dry season if pools are anticipated to hold water when construction begins. The salvaged soil samples will be stored and used to inoculate created pools once minimum performance standards are met at these locations. A USFWS-approved biologist shall be present at each active work site within 0.5-mile of potential fairy shrimp habitat until habitat disturbance has been completed. Thereafter, the contractor or SCE shall designate a person to monitor onsite compliance with all minimization measures. A USFWS-approved biologist shall ensure that this individual receives training consistent with USFWS requirements. A USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of fairy shrimp and their habitat, the importance of these species and their habitat, the general measures that are being implemented to conserve fairy shrimp as they relate to the project, and the boundaries within which the project construction shall occur. <p>All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any fairy shrimp habitat.</p>	<p>habitat disturbances are incurred; or directly within the project footprint after construction. A qualified biologist shall ensure that ponds are functioning as designed.</p> <p><u>Construction Activities</u></p> <ul style="list-style-type: none"> SCE shall submit the name and credentials of a biologist qualified to act as construction monitor to USFWS for approval at least 15 days before construction work begins. <u>If restoration is proposed to compensate for habitat loss,</u> wWith concurrence from the USFWS, a USFWS-approved biologist shall salvage soils from sites that are known to support vernal pool branchiopods at least 2 weeks before the onset of construction, or during the preceding dry season if pools are anticipated to hold water when construction begins. The salvaged soil samples will be stored and used to inoculate created pools once minimum performance standards are met at these locations. A USFWS-approved biologist shall be present at each active work site within 0.5-mile of potential fairy shrimp habitat until habitat disturbance has been completed. Thereafter, the contractor or SCE shall designate a person to monitor onsite compliance with all minimization measures. A USFWS-approved biologist shall ensure that this individual receives training consistent with USFWS requirements. A USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of fairy shrimp and their habitat, the importance of these species and their habitat, the general measures that are being implemented to conserve fairy shrimp as they relate to the project, and the boundaries within which the project construction shall occur. <p>All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any fairy shrimp habitat.</p>	
Table ES-1	ES-16	<p>Mitigation Measure 4.4-9a states:</p> <p>Mitigation Measure 4.4-9a: Apply Restoration Planning Methodology identified in Mitigation Measure 4.4-5c to Non-riparian Special-status Vegetation, which includes Riversidean Sage Scrub.</p>	<p>Please revise as follows:</p> <p>Mitigation Measure 4.4-9a: <u>Should SCE opt to participate in the MSHCP,</u> Apply Restoration Planning Methodology identified in Mitigation Measure 4.4-5c to Non-riparian Special-status Vegetation that is not fully covered under the MSHCP, which includes Riversidean Sage Scrub.</p>	<p>Proposed edits are intended for technical accuracy as some special-status vegetation, including Riversidean Sage Scrub would be fully mitigated through payment of mitigation fees and would not require additional mitigation. If SCE impacts vegetation that is not fully covered by the MSHCP, a DBESP would be developed.</p>
Table ES-1	ES-17	<p>Mitigation Measure 4.4-12 states:</p>	<p>Please revise as follows:</p>	<p>Proposed edits are intended for technical accuracy and to clarify that the 100 foot no-disturbance buffer only applies to active maternity roosts. This change is</p>

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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
		"Mitigation Measure 4.4-12: SCE shall ensure that a preconstruction survey for roosting bats shall be conducted by a qualified biologist prior to construction activities to characterize potential bat habitat and identify active roost sites. Surveys shall be conducted within 100 feet of construction activities. If an active bat roost being used for maternity is found within 100 feet of the construction activities, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active by the qualified biologist. Should potential roosting habitat or active bat roosts be found in trees to be removed or trimmed or poles to be replaced under the Project, SCE shall implement the following measures:	Mitigation Measure 4.4-12: SCE shall ensure that a preconstruction survey for roosting bats shall be conducted by a qualified biologist prior to construction activities to characterize potential bat habitat and identify active roost sites. Surveys shall be conducted within 100 feet of construction activities. If an active bat roost being used for maternity is found within 100 feet of the construction activities, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active <u>maternity roosts</u> by the qualified biologist. Should potential roosting habitat or active <u>non-maternity</u> bat roosts be found in trees to be removed or trimmed or poles to be replaced under the Project, SCE shall implement the following measures:	consistent with the mitigation approach described in the last sentence of the paragraph and the detailed measures in MM 4.4-12 bullets 1 – 5 which pertain to "potential roosting habitat or active bat roosts".
Table ES-1	ES-18	Mitigation Measure 4.5-1 states: Mitigation Measure 4.5-1: Prior to commencing Project-related construction activities associated with the Pedley Source Lines or the Alternative E4 telecommunication line, an architectural historian meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History shall assist Project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444 located in or adjacent to the Project Area – these contributing elements to the District shall subsequently be avoided during Project implementation.	Please revise as follows; Mitigation Measure 4.5-1: Prior to commencing Project-related construction activities associated with the Pedley Source Lines or the Alternative E4 telecommunication line, an architectural historian meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History shall assist Project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444 located in or adjacent to the Project Area – these contributing elements to the District shall subsequently be avoided during Project implementation. <u>Management of this resource will be captured in the Cultural Resources Management Plan (CRMP). The CRMP would include all management recommendations to avoid impacts to the District, including steps taken if changes during construction result in impacts to the contributing elements or character defining features of the District, and plotting the District’s contributing elements on construction plans.</u>	Proposed edits are intended to specify a more robust plan (the referenced CRMP) for managing this resource during construction. Plans change, and a certain amount of flexibility in the avoidance/minimization/mitigation for this resource is warranted. How resources like this are managed are traditionally captured in the project’s CRMP.
Table ES-1	ES-18 through ES-19	Mitigation Measure 4.5-2 states: Mitigation Measure 4.5-2: If prehistoric or historic-era archaeological resources are encountered during Project implementation, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance. The CPUC and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or	SCE proposes replacing Mitigation Measure 4.5-2 as follows: Mitigation Measure 4.5-2: If prehistoric or historic-era archaeological resources are encountered during Project implementation, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance. The CPUC and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or	In place of MM 4.5-2 as written, SCE proposes that a Cultural Resource Management Plan (CRMP) be created, which would reduce the risk of construction delays and potential disruptions to the impacted communities, while addressing all aspects of a project’s cultural resource requirements as they pertain to unanticipated discoveries, defining work stoppage, field methods, timelines, resource management and treatment, monitoring plans, data reporting, and tribal engagement prior to construction.

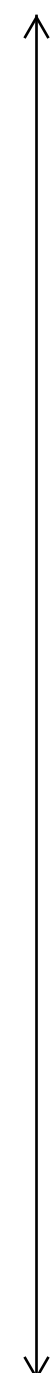
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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
		<p>toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.</p> <p>If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC §21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.</p> <p>If avoidance is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American-related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). This shall include documentation of the resource and may include data recovery or other measures. Any treatment other than preservation in place must be approved by the CPUC and the appropriate tribe if applicable. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource. The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of approved treatment and under the direction of the qualified archaeologist</p>	<p>toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.</p> <p>If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC §21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.</p> <p>If avoidance is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American-related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). This shall include documentation of the resource and may include data recovery or other measures. Any treatment other than preservation in place must be approved by the CPUC and the appropriate tribe if applicable. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource. The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of approved treatment and under the direction of the qualified archaeologist.</p> <p><u>Develop Cultural Resource Management Plan (CRMP) – SCE shall prepare and submit for approval a Cultural Resource Management Plan (CRMP) to guide all cultural resource management activities during project construction. Management of cultural resources shall follow the state standards and guidelines established in California Public Resources Code Sections 21083.2, 21084.1-3, and California Environmental Quality Act Section 15064.5, and Appendix G. The CRMP shall be submitted to the CPUC for review and approval at least 30 days prior to the start of construction. The CRMP shall include, but not be limited to, the following sections:</u></p> <ol style="list-style-type: none"> <u>Cultural Resource Monitoring and Field Reporting: Detail procedures for archaeological monitoring, reporting matrix, and when monitoring is no longer necessary. Include guidelines for monitoring in Areas of High Sensitivity for discovery of buried</u> 	



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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
			<p><u>NRHP and/or CRHR eligible cultural resources, including burials, cremations, or sacred sites.</u></p> <p>2. <u>Unanticipated Discovery Protocol: Detail procedures for halting construction, defining work stoppage zones, notifying stakeholders (e.g. agencies, Native Americans, utilities), and assessing NRHP and/or CRHR eligibility in the event unanticipated discoveries are encountered during construction. Include methods, timelines for assessing NRHP and/or CRHR eligibility, formulating mitigation plans, and implementing treatment. Mitigation and treatment plans for unanticipated discoveries shall be reviewed by appropriate Native American tribes and approved by the CPUC, prior to implementation.</u></p> <p><u>Data Analysis and Reporting: Detail methods for data analysis in a regional context, reporting of results within one year of completion of field studies, curation of artifacts and data (maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by the CPUC, and dissemination of reports to appropriate repositories.</u></p>	
Table ES-1	ES-20	<p>The second bullet under Mitigation Measure 4.5-4 states:</p> <p>Qualified personnel shall monitor excavations in areas identified as having moderate to high sensitivity for paleontological resources, and in areas mapped as Qaf, Qw, Qf, Qyw, Qyf, Qya, or Qye but which include excavations greater than 10 feet deep.</p>	<p>SCE recommends the following edits:</p> <p>1. Qualified personnel shall monitor excavations <u>(except drilling activities)</u> in areas identified as having moderate to high sensitivity for paleontological resources, and in areas mapped as Qaf, Qw, Qf, Qyw, Qyf, Qya, or Qye but which include excavations greater than 10 feet deep.</p>	<p>Proposed edits are intended for technical accuracy as the likelihood of observing and recovering significant fossils from drilling and augering activities is low.</p>
Table ES-1	ES-21	<p>Mitigation Measure 4.6-1 states:</p> <p>Mitigation Measure 4.6-1: SCE shall contract a qualified professional (i.e., construction planner/energy efficiency expert) to prepare a Construction Equipment Efficiency Plan that identifies the specific measures that SCE (and its construction contractors) will implement as part of Project construction to increase the efficient use of construction equipment to the maximum extent feasible. Such measures shall include, but not necessarily be limited to: procedures to ensure that all construction equipment is properly tuned and maintained at all times; a commitment to utilize existing electricity sources where feasible rather than portable diesel-powered generators; and identification of procedures (including the routing of haul trips) that shall be followed to ensure that all materials and debris hauling is conducted in a fuel-efficient manner. The plan shall be submitted to CPUC for review and approval at least 30 days prior to the beginning of construction activities.</p>	<p>Please revise as follows:</p> <p>Mitigation Measure 4.6-1: SCE shall contract a qualified professional (i.e., e.g., construction planner/energy efficiency expert, <u>Air Quality specialist, etc.</u>) to prepare a Construction Equipment Efficiency Plan that identifies the specific measures that SCE (and its construction contractors) will implement as part of Project construction to increase the efficient use of construction equipment to the maximum extent feasible. Such measures shall include, but not necessarily be limited to: procedures to ensure that all construction equipment is properly tuned and maintained at all times; a commitment to utilize existing electricity sources where feasible rather than portable diesel-powered generators; and identification of procedures (including the routing of haul trips) that shall be followed to ensure that all materials and debris hauling is conducted in a fuel-efficient manner. The plan shall be submitted to CPUC for review and approval at least 30 days prior to the beginning of construction activities.</p>	<p>SCE provides these edits to make clear that the types of “qualified professionals” that could serve to develop the energy efficiency plan are not limited to construction planners and/or “energy efficiency experts.”</p>

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Mira Loma-Jefferson 66kV Line and Circle City Substation Project

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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
Table ES-1	ES-26	Mitigation Measure 4.9-8 states: Mitigation Measure 4.9-8: As part of the siting and construction process, SCE shall identify objects, such as fences, metal buildings, pipelines, etc. that are within the ROW that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with Cal/OSHA Electrical Safety Orders at 8 CCR 2739. The identification of objects shall be provided to the CPUC at least 30 days prior to the commencement of construction, and shall document the thresholds of electric field strength and metallic object size at which grounding becomes necessary.	Please revise as follows: Mitigation Measure 4.9-8: As part of the siting and construction process, SCE shall identify objects, such as fences, metal buildings, pipelines, etc. that are within the <u>500 kV</u> ROW that have the potential for induced voltages <u>that would likely lead to static-like electrical shock</u> and shall implement electrical grounding of <u>those</u> metallic objects in accordance with Cal/OSHA Electrical Safety Orders at 8 CCR 2739. The identification of objects shall be provided to the CPUC at least 30 days prior to the commencement of construction, and shall document the thresholds of electric field strength and metallic object size at which grounding becomes necessary.	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
Table ES-1	ES-30	The first paragraph of Mitigation Measure 4.17-1 states: Mitigation Measure 4.17-1: SCE shall prepare and implement a Traffic Management Plan subject to approval of Caltrans and/or the applicable local government(s), including agencies that operate alternative modes of transportation (e.g., North Main Corona Metrolink Station, the Corona Cruiser/RTA bus route, and the Metrolink Rail path). The approved Traffic Management Plan and documentation of agency approvals shall be submitted to the CPUC prior to the commencement of construction activities. At a minimum, the plan shall:	Please revise as follows: Mitigation Measure 4.17-1: <u>As part of any required encroachment permit</u> , SCE shall prepare and implement a Traffic Management Plan subject to approval of Caltrans and/or the applicable local government(s), including agencies that operate alternative modes of transportation (e.g., North Main Corona Metrolink Station, the Corona Cruiser/RTA bus route, and the Metrolink Rail path). The approved Traffic Management Plan and documentation of agency approvals shall be submitted to the CPUC prior to the commencement of construction activities. At a minimum, the plan shall:	Traffic management plans as mitigation measures should only be required where encroachment permits are required.
1.2	1-2	First sentence on this page, it states: “In addition to the switchrack positions necessary for a 56 MVA substation, the site would be built with two additional (open) 66 kV switchrack positions that would allow for a potential future capacity upgrade to 112 MVA.”	Please revise as follows: In addition to the switchrack positions necessary for a 56 MVA substation, the site would be built <u>to accommodate with</u> two additional (open) 66 kV switchrack positions that would allow for a potential future <u>66kV network growth, and/or capacity upgrades, at Circle City Substation allowing for an ultimate capacity of 112 MVS (consistent with SCE’s standard substation design) to serve and electrical demand. to 112 MVA.</u>	Proposed edits are intended for technical accuracy and to clarify substation electrical needs.
1.3.1.2	1-4	First sentence of paragraph states: The 66 kV subtransmission lines that currently serve the ENA have operating limits of 125 MVA under normal system conditions and 168 MVA under contingency or abnormal system conditions referred to as an N-1 contingency.	Please revise as follows: The 66 kV subtransmission lines that currently serve the ENA have operating limits of 125 MVA under normal system conditions and <u>up to</u> 168 MVA under contingency or abnormal system conditions referred to as an N-1 contingency.	Proposed edits are intended for technical accuracy.
1.3.1.2	1-4	The second sentence from end of paragraph states:	Please revise as follows:	Proposed edits are intended for technical accuracy and better reflect the impacts of the proposed project on the line configuration.

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Mira Loma-Jefferson 66kV Line and Circle City Substation Project

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		To address this subtransmission line capacity issue, SCE proposes to replace the existing Mira Loma–Corona–Jefferson 66 kV Line with the Mira Loma-Jefferson and Mira Loma–Corona #2 66 kV lines.	To address this subtransmission line capacity issue, SCE proposes to <u>reconfigure</u> replace the existing Mira Loma–Corona–Jefferson 66 kV Line to <u>become</u> with the Mira Loma-Jefferson and Mira Loma–Corona #2 66 kV lines.	
1.3.2	1-4	<p>Entire section states:</p> <p>“SCE identified its objectives for the proposed Project in its PEA (SCE, 2015) as follows:</p> <ul style="list-style-type: none"> • Serve current and long-term peak electrical demand requirements in the electrical needs area (ENA) as soon as possible after receipt of applicable permits; • Enhance electrical system reliability by adding transformation and circuitry to serve increased electrical demand and by increasing operational flexibility; • Construct the new electrical facilities in close proximity to the electrical demand to effectively and efficiently serve the ENA; • Meet the proposed Project need while minimizing environmental impacts; • Meet the proposed Project need in a cost-effective manner; and • Design and construct the proposed Project in conformance with SCE's current engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects. <p>Upon consideration of the Applicant’s objectives, electrical demand projections, and other laws and regulations, this EIR identifies the following as the CPUC’s basic CEQA Project objectives:</p> <ul style="list-style-type: none"> • Subtransmission Service Objective – Maintain electrical system reliability by addressing overloads on the Mira Loma-Corona-Jefferson and Mira Loma-Corona 66 kV subtransmission lines that could occur under peak electrical demand conditions during the 2017 to 2026 forecast period; and • Distribution Service Objective – Ensure that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period. <p>The CPUC considers these two CEQA objectives to be the underlying purpose for the proposed Project. Under the proposed Project, the Subtransmission Service Objective would be addressed</p>	<p>Please revise as follows:</p> <p>“SCE identified its The objectives for the proposed Project, <u>as stated in SCE’s in its</u> PEA (SCE, 2015) <u>are</u> as follows:</p> <ul style="list-style-type: none"> • Serve current and long-term peak electrical demand requirements in the electrical needs area (ENA) as soon as possible after receipt of applicable permits; • Enhance electrical system reliability by adding transformation and circuitry to serve increased electrical demand and by increasing operational flexibility; • Construct the new electrical facilities in close proximity to the electrical demand to effectively and efficiently serve the ENA; • Meet the proposed Project need while minimizing environmental impacts; • Meet the proposed Project need in a cost-effective manner; and • Design and construct the proposed Project in conformance with SCE's current engineering, design, and construction standards for substation, transmission, subtransmission, and distribution system projects. <p>Upon consideration of the Applicant’s objectives, electrical demand projections, and other laws and regulations, this EIR identifies the following as the CPUC’s basic CEQA Project objectives:</p> <ul style="list-style-type: none"> • Subtransmission Service Objective – Maintain electrical system reliability by addressing overloads on the Mira Loma-Corona-Jefferson and Mira Loma-Corona 66 kV subtransmission lines that could occur under peak electrical demand conditions during the 2017 to 2026 forecast period; and • Distribution Service Objective – Ensure that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period. <p>The CPUC considers these two CEQA objectives to be the underlying purpose for the proposed Project. Under the proposed Project, the Subtransmission Service Objective would be addressed by constructing the proposed Mira Loma-Jefferson subtransmission line and associated</p>	<p>SCE disagrees with, and objects to, the revision made to the SCE project objectives as articulated in SCE’s PEA dated December 4, 2015. SCE requests that the project objectives associated with Circle City remain as stated in the December 4, 2015 dated PEA.</p> <p>To the extent the CPUC insists on changing SCE’s stated project objectives, SCE asserts that reliability and operational flexibility must be included as a component of both Project Objectives. Maintaining sufficient capacity to avoid exceeding capacity limits is a component of reliability. To this end, SCE suggests the following alternative edits should those proposed at left be rejected by the CPUC:</p> <p>“Upon consideration of the Applicant’s objectives, electrical demand projections, and other laws and regulations, this EIR identifies the following as the CPUC’s basic CEQA Project objectives:</p> <ul style="list-style-type: none"> • Subtransmission Service Objective – Maintain electrical system reliability by addressing overloads on the Mira Loma-Corona-Jefferson and Mira Loma-Corona 66 kV subtransmission lines that could occur under peak electrical demand conditions during the 2017 to 2026 forecast period; and • Distribution Service Objective - <u>Maintain electrical system reliability by ensuring</u> Ensure that the Corona, Jefferson, and Chase substations do not exceed their combined capacity under peak electrical demand conditions through the 2017 to 2026 forecast period <u>and by increasing operational flexibility.</u> <p>The CPUC considers these two CEQA objectives to be the underlying purpose for the proposed Project.</p>

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		by constructing the proposed Mira Loma-Jefferson subtransmission line and associated facilities; and the Distribution Service Objective would be addressed by the construction of the Circle City Substation, its source lines, and other associated facilities.”	facilities; and the Distribution Service Objective would be addressed by the construction of the Circle City Substation, its source lines, and other associated facilities.”	Under the proposed Project, the Subtransmission Service Objective would be addressed by constructing the proposed Mira Loma-Jefferson subtransmission line and associated facilities; and the Distribution Service Objective would be addressed by the construction of the Circle City Substation, its source lines, and other associated facilities.”						
Table 1-2	1-6	Under the heading “State”, the third row states: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;">Encroachment Permit</td> <td style="width:33%;">California Department of Transportation (Caltrans)</td> <td style="width:33%;">Construction operation, and maintenance within, under, or over state highway (State Route 118) ROW</td> </tr> </table>	Encroachment Permit	California Department of Transportation (Caltrans)	Construction operation, and maintenance within, under, or over state highway (State Route 118) ROW	Please revise as follows: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;">Encroachment Permit</td> <td style="width:33%;">California Department of Transportation (Caltrans)</td> <td style="width:33%;">Construction operation, and maintenance within, under, or over state highway (State Route <u>91, Interstate 15+118</u>) ROW</td> </tr> </table>	Encroachment Permit	California Department of Transportation (Caltrans)	Construction operation, and maintenance within, under, or over state highway (State Route <u>91, Interstate 15+118</u>) ROW	Proposed edits are intended for technical accuracy and correct the articulated state highways impacted by proposed project.
Encroachment Permit	California Department of Transportation (Caltrans)	Construction operation, and maintenance within, under, or over state highway (State Route 118) ROW								
Encroachment Permit	California Department of Transportation (Caltrans)	Construction operation, and maintenance within, under, or over state highway (State Route <u>91, Interstate 15+118</u>) ROW								
Table 1-2	1-7	N/A	Please added the following row to Table 1.2 under “Local”: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;"><u>Western Riverside Multiple Species Habitat (MSHCP) Conservation Plan Certificate of Inclusion</u></td> <td style="width:33%;"><u>Western Riverside County Regional Conservation Authority</u></td> <td style="width:33%;"><u>Implements the Riverside County MSHCP</u></td> </tr> </table>	<u>Western Riverside Multiple Species Habitat (MSHCP) Conservation Plan Certificate of Inclusion</u>	<u>Western Riverside County Regional Conservation Authority</u>	<u>Implements the Riverside County MSHCP</u>	The summary of potential permit requirements does not include the potential Western Riverside Multiple Species Habitat Conservation Plan. The proposed edits are intended to correct this oversight.			
<u>Western Riverside Multiple Species Habitat (MSHCP) Conservation Plan Certificate of Inclusion</u>	<u>Western Riverside County Regional Conservation Authority</u>	<u>Implements the Riverside County MSHCP</u>								
2.5.1.2	2-7 2-17 Should be 2-7	The first sentence states: The substation would include a steel 66 kV switchrack, approximately 45 feet tall, 156 feet long and 120 feet wide.	Please revise as follows: “The substation would include a steel 66 kV <u>steel</u> switchrack approximately 45 feet tall, 156 feet long, and 120 feet wide.”	Proposed edits are intended for technical accuracy as “steel” is the adjective which describes the switchrack’s characteristics.						

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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR																												
2.5.2.1	2-13	The second to last sentence in this section states: "The numbers and locations of proposed vaults and duct banks also are indicated. See also Figure 2-7, <i>Subtransmission Structures</i> , which illustrates single-circuit and double-circuit configurations with and without underbuild for the different types of poles and other structures proposed for installation."	Please revise as follows: "The numbers and locations of proposed vaults and duct banks also are indicated. See also Figure 2-7, <i>Subtransmission Structures</i> , which illustrates single-circuit and double-circuit configurations with and without underbuild (i.e. additional wires, cables, and other facilities below the subtransmission conductor position on the structures)"	Proposed edits are intended for clarity as "underbuild" had not been defined up to this point.																												
2.5.2.3	2-14	In the second paragraph, second to last sentence it states: "The lines would continue northeasterly along the south side of Magnolia Avenue to Leeson Lane, where they would continue northeast along Leeson Lane,"	Please revise as follows: "The lines would continue northeasterly along the south side of Magnolia Avenue to Leeson Lane, where they would continue northeast along <u>the south side of</u> Leeson Lane,"	Proposed edits are intended for technical accuracy and identify the correct side of street.																												
Figure 2-6	2-16	Call out near Santa Ana River states: "Remove: 2 H-Frame Hybrid Poles, 1 Wood Pole Install: 2 H-Frame Hybrid Poles, 1 LWS 3,440 Circuit Feet Conductor on Existing Structures"	For consistency with Section 2.5.2.4, page 2-20, please revise as follows: Remove: 2 H-Frame Hybrid Poles, 4 <u>2</u> Wood Poles, <u>11</u> LWS Install: 2 H-Frame Hybrid Poles, 4 <u>13</u> LWS 3,440 Circuit Feet Conductor on Existing Structures	In response to CPUC Data Request No. 3, Question No. 2, SCE stated that it plans to utilize 23 existing LWS poles. However, most recent engineering suggests these existing poles may not meet revised pole loading requirements. Therefore, for purposes of the EIR analysis, SCE asked the CPUC to analyze those poles as replacement poles. The proposed edits make that change and are intended for technical accuracy.																												
Table 2-1	2-21	The Pole/Structure Type and Approximate Quantity Columns state: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Pole/Structure Type</th> <th>Approximate Quantity</th> </tr> </thead> <tbody> <tr> <td>Wood Pole</td> <td>2</td> </tr> <tr> <td>LWS Pole</td> <td>338</td> </tr> <tr> <td>TSP</td> <td>48</td> </tr> <tr> <td>TSP Concrete Foundation</td> <td>48</td> </tr> <tr> <td>H-Frame Hybrid</td> <td>2</td> </tr> <tr> <td>Wood Guy Stub</td> <td>2</td> </tr> </tbody> </table>	Pole/Structure Type	Approximate Quantity	Wood Pole	2	LWS Pole	338	TSP	48	TSP Concrete Foundation	48	H-Frame Hybrid	2	Wood Guy Stub	2	Please revise these two columns as follows: <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Pole/Structure Type</th> <th>Approximate Quantity¹</th> </tr> </thead> <tbody> <tr> <td>Wood Pole</td> <td>2</td> </tr> <tr> <td>LWS Pole</td> <td>338</td> </tr> <tr> <td>TSP</td> <td>48</td> </tr> <tr> <td>TSP Concrete Foundation</td> <td>48</td> </tr> <tr> <td>H-Frame Hybrid</td> <td>2</td> </tr> <tr> <td>Wood Guy Stub</td> <td>2</td> </tr> </tbody> </table> ¹ <u>The precise design of this Project's facilities, including the number and type of structures, is subject to change following completion of final engineering, identification and/or verification of field conditions, completion of underground surveys, availability of labor, material, and equipment, compliance with applicable environmental and permitting requirements, and other factors.</u>	Pole/Structure Type	Approximate Quantity ¹	Wood Pole	2	LWS Pole	338	TSP	48	TSP Concrete Foundation	48	H-Frame Hybrid	2	Wood Guy Stub	2	Proposed edits are intended for technical accuracy and to indicate that project design, including number and type of structures, is subject to final engineering.
Pole/Structure Type	Approximate Quantity																															
Wood Pole	2																															
LWS Pole	338																															
TSP	48																															
TSP Concrete Foundation	48																															
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Wood Guy Stub	2																															
Table 2-1	2-21	Note 1 states:	Please revise as follows:	Proposed edits are intended for technical accuracy and clarity given final pole heights and spacing will																												

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		"Specific pole height and spacing would be determined upon final engineering and would be constructed in compliance with CPUC General Order (GO) 95."	"Specific pole height and spacing would be determined upon final engineering and would be constructed in compliance with CPUC General Order (GO) 95 <u>and SCE standards.</u> "	be determined consistent with SCE standards, as well as GO 95.
Table 2-1	2-21	Note 2 states: "Wood poles would consist of a wood pole with a steel wire known as a "down guy," which attaches to a 1-inch-diameter anchor at ground level located at the back side of the wood pole and a steel span guy that attaches to the top of the wood pole and the subtransmission poles (wood and LWS).	Please revise as follows: Wood poles would consist of a wood pole with a steel wire known as a "down guy," which attaches to a 1-inch-diameter anchor at ground level located at the back side of the wood pole and a steel span guy that attaches to the top of the wood pole and the subtransmission poles (wood and LWS).	Proposed edits are intended for technical accuracy as not all wood poles will be guyed.
2.5.4.1	2-23	In second paragraph it states: Location 2: One distribution pole would be removed at the end of Quarry Street, east of the Temescal Wash flood control channel. Existing distribution facilities would be transferred to a new proposed TSP. In addition, an existing underground distribution duct bank would be extended approximately 100 feet to the new TSP.	Please revise as follows: Location 2: One distribution pole would be removed at the end of Quarry Street, east of the Temescal Wash flood control channel. Existing distribution facilities would be transferred to a new proposed TSP <u>distribution structure (wood pole, LWS, etc.)</u> . In addition, an existing underground distribution duct bank would be extended approximately 100 feet to the new TSP <u>distribution structure (wood pole, LWS, etc.)</u> .	Proposed edits are intended for technical accuracy as distribution lines are not permitted to rise on a subtransmission TSPs and therefore additional distribution structures (wood pole, LWS, etc.) will be required at this location.
2.5.5	2-27	The fourth sentence of the second paragraph states: "At Joy Street, the fiber optic cable would convert to overhead at the proposed LWS pole that would be associated with the Paley Lines."	Please revise as follows: "At Joy Street, the fiber optic cable would convert to overhead at the proposed LWS pole that would be associated with the Paley <u>Pedley</u> Lines."	Proposed edits are intended for technical accuracy as the name of line is incorrectly designated.
2.6.1	2-28	The first sentence of this section states: "Access for construction and ongoing maintenance of the proposed subtransmission lines would be accomplished by utilizing a network of existing and proposed temporary and permanent roads within existing SCE ROW..."	Please revise as follows: "Access for construction and ongoing maintenance of the proposed subtransmission lines would be accomplished by utilizing a network of existing and proposed temporary and permanent roads within existing SCE <u>right-of-way (ROW)</u> ..."	Proposed edits are intended for clarity as "ROW" had not been defined up to this point.
2.6.3	2-30	The last sentence of this section states: "Debris would be mulched on site or removed to a permitted disposal location."	Please revise as follows: "Debris would be mulched <u>and spread</u> on site or removed to a permitted disposal location"	Proposed edits are intended for technical accuracy regarding mulching of debris.
2.6.4.1	2-30	The first paragraph of this section states: "The substation pad would be graded to maintain a minimum of 1-percent slope to drain toward the north. If required by the City of Corona, an approximately 700-foot extension of the existing storm drain system may be constructed to accept site flow onto Leeson Lane."	Please revise as follows: "The substation pad would be graded to maintain a minimum of 1-percent slope to drain toward the north. <u>The existing watershed area includes properties to the southeast and passes through the substation property; this water would drain to the north on surface swales through both the eastern</u>	Proposed edits are intended for clarity and to include description of the swales.

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			and western corridors, discharging onto Leeson Lane. If required by the City of Corona, an approximately 700-foot extension of the existing storm drain system may be constructed to accept site flow onto Leeson Lane.”													
Table 2-4	2-34	In eleventh row under Mira Loma-Jefferson 66kV Subtransmission Line <table border="1"> <tr> <td>Install new underground duct bank (6, 7, 16)</td> <td>420</td> <td>Linear feet by 15 feet wide</td> <td>0.1</td> <td>0.1</td> <td>0.0</td> </tr> </table>	Install new underground duct bank (6, 7, 16)	420	Linear feet by 15 feet wide	0.1	0.1	0.0	Please revise as follows: <table border="1"> <tr> <td>Install new underground duct bank (6, 7, 16)</td> <td>420</td> <td><u>Linear</u> feet by 15 feet wide</td> <td>0.1</td> <td>0.1</td> <td>0.0</td> </tr> </table>	Install new underground duct bank (6, 7, 16)	420	<u>Linear</u> feet by 15 feet wide	0.1	0.1	0.0	Proposed edits are intended for clarity and for consistency.
Install new underground duct bank (6, 7, 16)	420	Linear feet by 15 feet wide	0.1	0.1	0.0											
Install new underground duct bank (6, 7, 16)	420	<u>Linear</u> feet by 15 feet wide	0.1	0.1	0.0											
2.6.6.3	2-39	The second sentence in this section states: “To ensure the safety of workers and the public, safety devices such as guard structures, radio-equipped public safety roving vehicles, and linemen would be in place prior to the initiation of wire stringing activities.”	Please revise as follows: “To ensure the safety of workers and the public, safety devices such as <u>traveling grounds, electrical-shock prevention mat</u> , guard structures, radio-equipped public safety roving vehicles, and linemen would be in place prior to the initiation of wire stringing activities.”	Proposed edits are intended to clarify safety devices commonly employed.												
2.6.6.3	2-40	The second sentence in Step 5 states: “Once this is complete, spacers would be attached between the bundled conductors of each phase to keep uniform separation between each conductor.”	Please revise as follows: Once this is complete, spacers would be attached between the bundled conductors of each phase to keep uniform separation between each conductor.	Proposed edits are intended for technical accuracy as there are no bundled conductors for subtransmission facilities.												
2.6.6.4	2-41	The second sentence in this section states: "Temporary netting could be required to be installed by the California Highway Patrol or other jurisdictional agency"	Please revise as follows: "Temporary netting could be required to be installed by the California Highway Patrol, <u>California Department of Transportation (Caltrans)</u> or other jurisdictional agency"	Proposed edits are intended for technical accuracy as Caltrans will likely be the agency requiring netting.												
2.6.7.2	2-41	The first sentence in this section: “The Project includes a total of approximately 4,980 feet of new underground 66 kV subtransmission lines and associated transition and support structures.”	Please revise as follows: “The Project includes a total of approximately 4,980 <u>4,910</u> feet of new underground 66 kV subtransmission lines and associated transition and support structures.”	Proposed edits are intended for technical accuracy and consistency with disturbance table 2-4.												
2.6.7.2	2-42	The first sentence of the second paragraph of this section states: "The trench for underground construction would be widened and shored where appropriate to meet California Occupation and Safety Health Administration requirements."	Please revise as follows: "The trench for underground construction would be widened and shored where appropriate to meet California Occupation and Safety Health Administration (<u>Cal OSHA</u>) requirements."	Proposed edits are intended for clarity as the first instance where “Cal OSHA” could be employed as an acronym.												

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2.6.7.4	2-42	The third sentence in section states: “Duct banks would consist of six or eight 6-inch-diameter polyvinyl chloride (PVC) conduits fully encased with a minimum of 3 inches of concrete all around.”	Please revise as follows: “Duct banks would consist of six or eight 56-inch-diameter polyvinyl chloride (PVC) conduits fully encased with a minimum of 3 inches of concrete all around.”	Proposed edits are intended for technical accuracy and consistency with Figure 2-10.
2.6.7.5	2-43	The third sentence in section states: “The vaults would be placed approximately 300 to 800 feet apart along the underground portion of the subtransmission lines.”	Please revise as follows: “The vaults would be placed approximately <u>50 to 1,500</u> 300 to 800 feet apart along the underground portion of the subtransmission lines.”	Proposed edits are intended for technical accuracy consistent with SCE standards for 66kV construction.
2.6.8	2-46	The last sentence in this section states: “To reduce the need for electrical service interruption, de-energize and re-energizing the existing subtransmission lines would occur at night when electrical demand is low or otherwise in accordance with California Independent System Operator’s requirements.”	Please revise as follows: “To reduce the need for electrical service interruption, de-energize and re-energizing the existing subtransmission lines would occur at night when electrical demand is low or otherwise in accordance with California Independent System Operator’s requirements.”	Proposed edits are intended for technical accuracy as night work may actually not be the best time or when load is the lowest, per se.
2.6.9	2-46	The first sentence in the second paragraph states: “Overhead fiber optic cable would be installed on overhead structures, as described in Section 2.6.5.3, <i>Conductor Stringing</i> .”	Please revise as follows: “Overhead fiber optic cable would be installed on overhead structures, as described in Section 2.6. 5 <u>6</u> .3, <i>Conductor Stringing</i> .”	Proposed edits are intended for clarity and to identify Section 2.6.6.3 as the correct section for Conductor Stringing.
2.6.9	2-47	Last sentence in third paragraph of this section states: "The manhole or pull box would be lowered into place, connected to the conduits, and backfilled with concrete slurry."	Please revise as follows: "The manhole or pull box would be lowered into place, connected to the conduits, and <u>the area surrounding the manhole or pull box would be</u> backfilled with concrete slurry."	Proposed edits are intended for technical accuracy and to clarify that the area <i>surrounding</i> the manhole (but <i>not</i> the manhole itself) would be backfilled.
2.6.15	2-58	The first sentence of the second paragraph states: “Construction activities would adhere to the allowable construction work hours specified in the noise ordinances of local jurisdictions, including as allowed by variance if necessary.”	Please revise as follows: “Construction activities would adhere to the allowable construction work hours specified in the noise ordinances of local jurisdictions <u>where feasible, including as allowed by variance if necessary.</u> <u>In the event construction activities are necessary on days or hours outside of what is specified by ordinance (for example, if existing electricity lines must be taken out of service for the work to be performed safely and the line outage must be taken at night for system reliability reasons, or if construction needs require continuous work), SCE would provide 5-day advanced notification, including a general description of the work to be performed, location, and hours of construction anticipated, to the CPUC, any applicable/impacted local jurisdiction, and residents within 300 feet of</u>	Certain SCE construction activities require work to be performed outside of locally regulated construction hours. Variances are discretionary approvals and, consistent with G.O. 131-D, the CPUC is the only governmental agency with discretionary authority regarding SCE’s projects. It would inconsistent with the CPUC’s jurisdiction for SCE to seek discretionary approvals from local municipalities. In lieu of a variance, SCE has specifically described what actions would be taken in the relatively rare and limited circumstances under which SCE construction activities are required outside of the construction hours prescribed by local ordinance.

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			<u>the anticipated work, as well as route all after-hours construction traffic away from residences, schools, and recreational facilities to the maximum extent feasible. These requirements may be waived in the event that emergency and/or potentially unsafe work conditions would be created by limiting construction activities to those hours specified by ordinance. SCE would report any such events to the CPUC within five (5) business days.</u>		A20-71 cont.
2.7	2-60	The first sentence of the second paragraph states: "Maintenance of some pole locations and associated lay down areas could result in ground and/or vegetation disturbance, though attempts would be made to utilize previously disturbed areas to the greatest extent possible."	Please revise as follows: "Maintenance of some pole locations and associated lay down areas could result in ground and/or vegetation disturbance, though attempts would be made to utilize previously disturbed areas to the greatest extent possible. <u>In some cases new access would be created to remove and replace an existing pole.</u> "	Proposed edits are intended for technical accuracy as not every pole has drivable access.	A20-72
2.9	2-62	Under Subtransmission bullet, the last sentence states: "however, approximately 110 private properties would require new or upgraded land rights and agency permits (87 private property and 23 agency) based on final engineering."	Please revise as follows: "however, approximately 110 private properties would require new or upgraded <u>amended</u> land rights and agency permits (87 private property and 23 agency) based on final engineering."	Proposed edits are intended for clarity and to avoid inadvertent misunderstandings regarding the use of the term "upgraded" in the context of land rights.	A20-73
2.9	2-63	Last sentence of this section states: "Upgrading easements may include adding land rights, adding width to existing easements, improving or clarifying access or maintenance rights."	Please revise as follows: "Upgrading easements may include <u>amending existing</u> adding land rights, <u>by</u> adding width to existing easements, improving or clarifying access or maintenance rights."	Proposed edits are intended for clarity and to avoid inadvertent misunderstandings regarding the use of the term "adding" in the context of land rights.	A20-74
3.2.2	3-3	In the Distribution Service Objective bullet, it states: "Ensure that the Corona, Jefferson, and Chase substations do not exceed their combined capacity under peak electrical demand conditions through the 2017 to 2026 forecast period."	Please revise as follows: " <u>Maintain electrical system reliability by ensuring</u> Ensure that the Corona, Jefferson, and Chase substations do not exceed their combined capacity under peak electrical demand conditions through the 2017 to 2026 forecast period <u>and by increasing operational flexibility.</u> "	Reliability and operational flexibility must be included as a component of both Project Objectives. Maintaining sufficient capacity to avoid exceeding capacity limits is a component of reliability.	A20-75
3.2.2	3-4	The first sentence on this page states: "In order to assess the ability of alternatives to meet forecasted electrical demand and maintain sufficient voltage, the following factors were considered:"	Please revise as follows: "In order to assess the ability of alternatives to meet forecasted electrical demand and maintain sufficient voltage <u>and reliability</u> , the following factors were considered:"	Reliability must be included as a component of both Project Objectives.	A20-76
3.2.4	3-5	The first sentence in the second paragraph states:	For consistency with Table 3-1, please revise as follows:	Proposed edits are intended for clarity and consistency with Table 3-1.	A20-77

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		"The Project would result in significant and unavoidable environmental effects on aesthetics, air quality, hazards, and noise."	"The Project would result in significant and unavoidable environmental effects on aesthetics, air quality, hazards , and noise."									
Table 3-2	3-7	The last bullet in Hazards and Hazardous Materials states: "Induced currents associated with operation of the Project could generate electrical shocks."	Please revise as follows; "Induced currents associated with operation of the Project could generate <u>static-like</u> electrical shocks."	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish "electric shock," which could cause serious injury or death from the "static-like electric shocks," which are not harmful.								
Table 3-3	3-9	Under Substation Source Line Alternative heading, the third row states: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;">Alternative E3: Southern 66 kV Source Lines Alignment. This alternative would replace the Databank Source Lines. Alternative E3 also includes construction of Circle City Substation, Databank Source Lines, and the Mira Loma Subtransmission line (and/or associated alternatives).</td> <td style="width:16.5%;">Meets Project Distribution Service Objective.</td> <td style="width:16.5%;">Meets feasibility criteria.</td> <td style="width:34%;">Increases significant aesthetics and noise impacts.</td> </tr> </table>	Alternative E3: Southern 66 kV Source Lines Alignment. This alternative would replace the Databank Source Lines. Alternative E3 also includes construction of Circle City Substation, Databank Source Lines, and the Mira Loma Subtransmission line (and/or associated alternatives).	Meets Project Distribution Service Objective.	Meets feasibility criteria.	Increases significant aesthetics and noise impacts.	Please revise as follows: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;">Alternative E3: Southern 66 kV Source Lines Alignment. This alternative would replace the Databank Source Lines. Alternative E3 also includes construction of Circle City Substation, Databank <u>Pedley</u> Source Lines, and the Mira Loma-<u>Jefferson 66kV</u> subtransmission line (and/or associated alternatives).</td> <td style="width:16.5%;">Meets Project Distribution Service Objective.</td> <td style="width:16.5%;">Meets feasibility criteria.</td> <td style="width:34%;">Increases significant aesthetics and noise impacts.</td> </tr> </table>	Alternative E3: Southern 66 kV Source Lines Alignment. This alternative would replace the Databank Source Lines. Alternative E3 also includes construction of Circle City Substation, Databank <u>Pedley</u> Source Lines, and the Mira Loma- <u>Jefferson 66kV</u> subtransmission line (and/or associated alternatives).	Meets Project Distribution Service Objective.	Meets feasibility criteria.	Increases significant aesthetics and noise impacts.	Proposed edits are intended for technical accuracy as Alternative E3 is an alternate alignment for Databank Source Lines. Therefore, E3 would include Pedley Source Lines. In addition, the proposed edits correct the actual name of the referenced Mira Loma-Jefferson line.
Alternative E3: Southern 66 kV Source Lines Alignment. This alternative would replace the Databank Source Lines. Alternative E3 also includes construction of Circle City Substation, Databank Source Lines, and the Mira Loma Subtransmission line (and/or associated alternatives).	Meets Project Distribution Service Objective.	Meets feasibility criteria.	Increases significant aesthetics and noise impacts.									
Alternative E3: Southern 66 kV Source Lines Alignment. This alternative would replace the Databank Source Lines. Alternative E3 also includes construction of Circle City Substation, Databank <u>Pedley</u> Source Lines, and the Mira Loma- <u>Jefferson 66kV</u> subtransmission line (and/or associated alternatives).	Meets Project Distribution Service Objective.	Meets feasibility criteria.	Increases significant aesthetics and noise impacts.									
Table 3-3	3-9	Under Substation Source Line Alternative heading, the fourth row states:	Please revise as follows: <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;">Alternative E4 Databank 66 kV Source Lines Only. This alternative would eliminate the</td> <td style="width:16.5%;">Meets Project Distribution Service Objective.</td> <td style="width:16.5%;">Meets feasibility criteria.</td> <td style="width:34%;">Increases significant aesthetics and noise impacts.</td> </tr> </table>	Alternative E4 Databank 66 kV Source Lines Only. This alternative would eliminate the	Meets Project Distribution Service Objective.	Meets feasibility criteria.	Increases significant aesthetics and noise impacts.	Proposed edits are intended for clarity and to correct the actual name of the referenced Mira Loma-Jefferson line.				
Alternative E4 Databank 66 kV Source Lines Only. This alternative would eliminate the	Meets Project Distribution Service Objective.	Meets feasibility criteria.	Increases significant aesthetics and noise impacts.									

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Section	Page	DEIR Language				SCE Recommended Language				Reason for Change in DEIR	
		Alternative E4 Databank 66 kV Source Lines Only. This alternative would eliminate the Pedley Source lines component of the Project. Alternative E4 also includes construction of Circle City Substation, Circle City to Corona fiber line, and the Mira Loma subtransmission line (and/or associated alternatives	Meets Project Distribution Service Objective.	Meets feasibility criteria.	Increases significant aesthetics and noise impacts.		Pedley Source lines component of the Project. Alternative E4 also includes construction of Circle City Substation, Circle City to Corona fiber line, and the <u>Mira Loma-Jefferson 66kV</u> subtransmission line (and/or associated alternatives				
Figure 3-1	3-12	Under Substation Source Lines, the last box states: <p align="center">“One or Both of the Following: Alternative E3: Southern 66 kV Source Lines Alignment and/or Alternative E4: Databank 66 kV Source Lines Only”</p>				For clarification, please revise as follows: <p align="center">One or Both of the Following: Alternative E3: Southern 66 kV Source Lines Alignment and/or Alternative E4: Databank 66 kV Source Lines Only</p>				Proposed edits are intended for technical accuracy as Alternative E3 is an alternate alignment for the Databank lines. As such, both alternatives would not be chosen.	
3.4.1	3-13	The second sentence of the fourth paragraph states: "Operating procedures to relieve base case thermal overloads of the subtransmission system forecasted as early as 2018 would include transferring load between the substations via distribution circuits, load dropping on one or more distribution circuits, or disconnecting entire substations from the Loma Vista System."				Please revise as follows: "Operating procedures to relieve base case thermal overloads of the subtransmission system forecasted as early as 2018 would include transferring load between the substations via distribution circuits, load dropping on one or more distribution circuits, or disconnecting entire substations from the <u>Mira Loma Vista</u> System."				Proposed edits are intended for technical accuracy and to identify the correct name of the system at issue.	

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Figure 3-2b	3-15	The figure does not show the required telecom routes for this alternative.	Please revise to include the telecom routes shown on <u>Attachment 2</u> hereto.	Proposed edits are intended for clarity as the figure does not show the required telecom routes for this alternative.	A20-83
3.4.3.3	3-17	The second to last sentence in the second paragraph states: "The analysis of Alternative C3 assumes construction of three battery storage and substation facilities with a combined capacity of 132 MW connected to Corona Substation, Jefferson Substation, and Chase Substation."	Please revise as follows "The analysis of Alternative C3 assumes construction of three battery storage and substation facilities with a combined capacity of 132 MW. <u>These sites would be connected to the subtransmission system through 66 kV subtransmission lines which supply</u> Corona Substation, Jefferson Substation, and Chase Substations."	Proposed edits are intended for technical accuracy as the batteries would be integrated by connecting to the 66 kV lines and not at the substations.	A20-84
3.4.3.3	3-18	Under the 50 MW Connected to Corona Substation heading, the second paragraph states: "The facility would connect to Corona Substation via a new approximately 0.5-mile double circuit 66 kV subtransmission line that would loop into the existing Corona-Chase-Databank 66 kV subtransmission line. The new double-circuit 66 kV subtransmission line would be supported by tubular steel poles (TSPs) along the north side of W. 6th Street from the site to the existing Corona-Chase-Databank 66 kV subtransmission line at S. Lincoln Avenue."	Please revise the description as follows: "The facility would connect to Corona Substation via a new approximately 0.5-mile double circuit 66 kV subtransmission line that would loop into the existing Corona-Chase-Databank 66 kV subtransmission line. The new double-circuit 66 kV subtransmission line would be supported by tubular steel poles (TSPs) along the north side of W. 6th Street from the site to the existing Corona-Chase-Databank 66 kV subtransmission line at S. Lincoln Avenue. <u>In addition, two telecommunications lines would be required to connect the facility to SCE's existing telecommunications system. One telecommunications line would exit the battery storage substation site in an underground configuration for approximately 100 feet to the north side of West 6th Street. The telecommunication line would rise to an overhead position and follow the same alignment as the new double-circuit 66 kV subtransmission line to S. Lincoln Avenue where it would tap into the existing Mira Loma-Corona Fiber Optic Cable. The second telecommunications line would exit the battery storage facility and install approximately 1,100 feet of new underground conduit and cable along the north side of W. 6th Street to an existing pole on South Sherman Street, where it would rise and tap into the existing Corona-Pedley Fiber Optic Cable.</u> "	Proposed edits are intended for technical accuracy as two diverse telecommunications lines would be required to connect the facility to SCE existing telecommunications system. <u>Attachment 2</u> hereto includes a map of the telecommunications route.	A20-85
3.4.3.3	3-18	Under the 42 MW Connected to Jefferson Substation heading, the second paragraph states: "To connect the facility to Jefferson Substation, a 1.0-mile segment of the existing single-circuit Corona-Jefferson 66 kV subtransmission line would be converted to double circuit from the site to Jefferson Substation. The existing subtransmission line wood poles would be replaced with taller TSPs along the west side of the drainage canal that borders the east side of the site from the site to the north side of Ontario Avenue, where the line	Please revise the description as follows: "To connect the facility to Jefferson Substation, a 1.0-mile segment of the existing single-circuit Corona-Jefferson 66 kV subtransmission line would be converted to double circuit from the site to Jefferson Substation. The existing subtransmission line wood poles would be replaced with taller TSPs along the west side of the drainage canal that borders the east side of the site from the site to the north side of Ontario Avenue, where the line would turn east before crossing Ontario Avenue to enter Jefferson	Proposed edits are intended for technical accuracy as two diverse telecommunications lines would be required to connect the facility to SCE existing telecommunications system. <u>Attachment 2</u> hereto includes a map of the telecommunications route.	A20-86

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		would turn east before crossing Ontario Avenue to enter Jefferson Substation. Minor upgrades to Jefferson Substation also would occur to accommodate the new subtransmission line circuit.”	Substation. Minor upgrades to Jefferson Substation also would occur to accommodate the new subtransmission line circuit. <u>In addition, two telecommunications lines would be required to connect the facility to SCE’s existing telecommunications system. One telecommunications line would exit the battery storage substation site in an underground configuration for approximately 150 feet to the west side of the drainage canal that borders the east side of the site. The telecommunication line would rise to an overhead position and follow the same alignment as the double-circuit 66 kV subtransmission line to a pole just north of Jefferson Substation. The telecommunications line would then convert to an underground configuration and continue into Jefferson Substation in approximately 520 feet of new underground conduit to the existing MEER building. The second telecommunications line would exit the battery storage facility in an underground configuration for approximately 150 feet to the west side of the drainage canal that borders the east side of the site. The telecommunications line would rise to an overhead position and continue north along an existing pole line for approximately 1,700 feet to the south side of Tenth Street, where it would convert to an underground position. The telecommunications line would continue easterly approximately 1,500 feet in new underground conduit to an existing pole on S. Lincoln Avenue and rise to an overhead position. The telecommunications line would then continue south along the existing pole line for approximately 5,700 feet to the northeast corner of W. Ontario Avenue and S. Lincoln Avenue where it would convert to an underground position and continue into Jefferson Substation in approximately 260 feet of new underground conduit to the existing MEER.”</u>	
3.4.3.3	3-19	Under the 40 MW Facility Connected to Chase Substation, the first paragraph states: “The battery storage and substation site would be located off the south side of Leeson Lane, just northwest of the proposed Circle City Substation site. This undeveloped site has an area of approximately 4.5 acres and its fenced area would be approximately 4.0 acres. It would be accessed by a 26-foot-wide driveway from Lesson Lane that would enter the site from the northeast. To connect the facility to Chase Substation, a new double-circuit 66 kV subtransmission line 1.2 miles in length would be constructed to loop the facility into the existing Chase-Corona-Databank 66 kV Subtransmission Line from a point just west of Rimpau Avenue on the south side of Magnolia Avenue to the facility site. This 66 kV subtransmission connection would be the same as the Databank Source Lines that would be required for the proposed Circle City Substation. If this site is selected and both Alternative C3 and the proposed Circle City	Please revise the description as follows: “The Databank Source Lines are described in greater detail in Section 2.5.2.3, <u>In addition, a telecommunications line would be required to connect the facility to SCE’s existing telecommunications system. One telecommunications line would be along Magnolia Avenue and would tap the battery storage facility to the existing Corona-Jefferson fiber line. The proposed 5,500-foot telecommunications line (referred to here as the Battery Storage Tap to Corona-Jefferson fiber route) would consist of approximately 2,500 feet of new underground conduit and approximately 3,000 feet in existing underground conduit. The second telecommunications line would be 18,000 feet long and would consist of approximately 5,200 feet of new underground conduit, approximately 5,000 feet of new fiber placed in existing underground conduit, and approximately 7,800 feet of the line would be attached to existing distribution poles. Refer to Figure 3-6, for an illustration of the alternative fiber alignment and where it would be installed in underground conduit and where it would be installed overhead</u>	Proposed edits are intended for technical accuracy as a telecommunications lines would be required to connect the facility to SCE existing telecommunications system. <u>Attachment 2</u> hereto includes a map of the telecommunications route.

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		Substation are approved, both facilities would utilize these lines. The Databank Source Lines are described in greater detail in Section 2.5.2.3,”	on existing distribution poles. The new conduit would exit the substation on Leeson Lane, turn north on Magnolia Avenue, and then west on East 6th Street to a location west of El Camino Avenue and the railroad. There would also be short segments of conduit installed along East 3rd Street, South Belle Street, and North Sheridan Street. The minimum width and depth requirements for the trenches that would be used to install the telecommunications fiber conduit are 18 to 24 inches and 36 inches, respectively. A drawing of the telecommunications conduit is provided in Figure 3-5, <i>Communications Conduit Trench Detail</i> . The majority of the new conduit would be installed using a backhoe (SCE, 2018i); however, directional boring would be used for the telecommunication fiber to cross under the existing Burlington Northern Santa Fe (BNSF) railroad tracks that run north/south, approximately 50 feet east of El Camino Avenue. The directional boring would take place approximately 40 feet east of El Camino Avenue in an east/west direction. The bore (tunnel) would be approximately 80 feet in length, 12 inches in diameter, and 3 feet deep. Entrance and exit pits would be approximately 4 feet wide, 8 feet long, and 4 feet deep. The duration of boring activities to cross under the railroad tracks would take approximately 2 days. Site preparation and restoration for the bore pits on 6th Street would include saw-cutting the required area and removing asphalt, excavating the necessary depth for boring, backfilling, and repaving the street to City of Corona standards (SCE, 2018j). The overhead segments of the telecommunication line would be installed on 39 existing wood distribution poles primarily along East 3rd Street, Quarry Street, and West 2nd.”	
3.4.3.3	3-19	The third sentence under subheading 40 MW Facility Connected to Chase Substation states: “It would be accessed by a 26-foot-wide driveway from Lesson Lane that would enter the site from the northeast.”	Please revise as follows: “It would be accessed by a 26-foot-wide driveway from Lesson Leeson Lane that would enter the site from the northeast.”	Proposed edits are intended for clarity and correct the spelling of “Leeson Lane.”
3.4.4.1	3-20	"Based on analysis conducted by SCE, a 10 MW battery storage facility (referred to as Option 2A by SCE), comprised of two 5 MW installations (with a corresponding energy capacity of approximately 24 megawatt hours (MWh)) that would be connected to two existing distribution circuits near the site, would be sufficient to satisfy the Project’s Distribution Service Objective."	""Based on analysis conducted by SCE, a 10 MW battery storage facility (referred to as Option 2A by SCE), comprised of two 5 MW installations (with a corresponding <u>total</u> energy capacity of approximately 24 megawatt hours (MWh)) that would be connected to two existing distribution circuits near the site, would be <u>anticipated sufficient</u> to satisfy the Project’s Distribution Service Objective <u>through 2027</u> ."	Proposed edits are intended for clarity that the total energy capacity is approximately 24 MWh, and not the amount for each battery installation. Further these installations are only expected to satisfy the referenced Project Objective through 2027.
3.4.4.1	3-21	"SCE has stated that construction would occur over the following three phases: phase 1 would include an initial installation of 10 MW (Option 2A) for operation by 2021"	"SCE has stated that construction would occur over the following three phases: phase 1 would include an initial installation of 10 MW (Option 2A) for operation by 2021" [insert footnote after "2021"]	Proposed edits are intended for clarity and to explain why the 2021 operating date precedes the 2024 need date.

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			<u>[Footnote text:] "Installation of phase 1 for operation by 2021 would allow SCE to operate the battery storage installation for several years in advance of the projected capacity shortfall in 2024. This would provide SCE the opportunity to gain operational experience with the battery installation and to evaluate its performance under a variety of system conditions prior to the anticipated capacity shortfall addressed by the batteries."</u>	
Figure 3-3	3-22	The figure does not show the second telecom route required for this alternative.	Please revise the figure to show the second telecom route as shown on <u>Attachment 3</u> .	Proposed edits are intended for technical accuracy as a second telecommunications line (in addition to the Magnolia route depicted) would be required to connect the facility to SCE existing telecommunications system. <u>Attachment 3</u> hereto includes a map of the telecommunications route.
3.4.4.1	3-24 to 3-25	Under the heading, Telecommunication Connection, the first paragraph states: "Alternative D1 would require installation of a new telecommunications line to connect the battery storage facilities to SCE's existing telecommunications system. The new telecommunications line would be along Magnolia Avenue and would tap the battery storage facility to the existing Corona-Jefferson fiber line. The proposed 5,500-foot telecommunications line (referred to here as the Battery Storage Tap to Corona-Jefferson fiber route) would consist of approximately 2,500 feet of new underground conduit and approximately 3,000 feet in existing underground conduit. Refer to Figure 3-3 for an illustration of Alternative D1's Battery Storage Tap to Corona-Jefferson fiber route. The figure also shows where the new underground conduit installations would be required and where the line would be installed within existing underground conduit."	Two communication paths are required for the battery storage facility. Please add the following language after the third paragraph to describe the second communication path within the description of Alternative D1. <u>"In addition, a telecommunications line would be required to connect the facility to SCE's existing telecommunications system. One telecommunications line would be along Magnolia Avenue and would tap the battery storage facility to the existing Corona-Jefferson fiber line. The proposed 5,500-foot telecommunications line (referred to here as the Battery Storage Tap to Corona-Jefferson fiber route) would consist of approximately 2,500 feet of new underground conduit and approximately 3,000 feet in existing underground conduit. The second telecommunications line would be 18,000 feet long and would consist of approximately 5,200 feet of new underground conduit, approximately 5,000 feet of new fiber placed in existing underground conduit, and approximately 7,800 feet of the line would be attached to existing distribution poles. Refer to Figure 3-6, for an illustration of the alternative fiber alignment and where it would be installed in underground conduit and where it would be installed overhead on existing distribution poles. The new conduit would exit the substation on Lesson Lane, turn north on Magnolia Avenue, and then west on East 6th Street to a location west of El Camino Avenue and the railroad. There would also be short segments of conduit installed along East 3rd Street, South Belle Street, and North Sheridan Street. The minimum width and depth requirements for the trenches that would be used to install the telecommunications fiber conduit are 18 to 24 inches and 36 inches, respectively. A drawing of the telecommunications conduit is provided in Figure 3-5, Communications Conduit Trench Detail. The majority of the new conduit would be installed using a backhoe (SCE, 2018i); however, directional boring would be used for the telecommunication fiber to cross</u>	Proposed edits are intended for technical accuracy as Alternative D1 requires two telecommunication paths. Alternative E4 includes the description of the second telecommunication path.

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			<u>under the existing Burlington Northern Santa Fe (BNSF) railroad tracks that run north/south, approximately 50 feet east of El Camino Avenue. The directional boring would take place approximately 40 feet east of El Camino Avenue in an east/west direction. The bore (tunnel) would be approximately 80 feet in length, 12 inches in diameter, and 3 feet deep. Entrance and exit pits would be approximately 4 feet wide, 8 feet long, and 4 feet deep. The duration of boring activities to cross under the railroad tracks would take approximately 2 days. Site preparation and restoration for the bore pits on 6th Street would include saw-cutting the required area and removing asphalt, excavating the necessary depth for boring, backfilling, and repaving the street to City of Corona standards (SCE, 2018j). The overhead segments of the telecommunication line would be installed on 39 existing wood distribution poles primarily along East 3rd Street, Quarry Street, and West 2nd."</u>	
3.4.5.4	3-30	In the first sentence of the third paragraph it states: "The new conduit would exit the substation on Lesson Lane,..."	Please revise as follows: "The new conduit would exit the substation on <u>Leeson</u> Lesson Lane,..."	Proposed edits are intended for clarity and correct the spelling of "Leeson Lane."
Figure 3-6	3-25	The legend is missing the second telecommunication line required for Alternative D1	To be consistent with SCE's comment on Section 3.4.4.1 Page 3-24 and 3-25, please add Alternative E4 overhead telecommunication line and underground telecommunication line to Alternative D1 in the legend	Proposed edits are intended for technical accuracy as a second telecommunications line (in addition to the Magnolia route depicted) would be required to connect the facility to SCE existing telecommunications system. <u>Attachment 3</u> hereto includes a map of the telecommunications route.
Table 4.1-1	4.1-4	Under the Scenic Status Column, the first row states: "Portion south of State Route 91 is an Eligible State Scenic Highway within Riverside County."	The description for I-15 was swapped with the description for SR-91. Please swap the two descriptions as follows: Portion south of State Route 91 is an Eligible State Scenic Highway within Riverside County. <u>Portion east of I-15 is an Eligible State Scenic Highway within San Bernardino and Riverside Counties.</u>	Proposed edits are intended for technical accuracy as it appears that the description for I-15 is actually that of SR-91.
Table 4.1-1	4.1-4	Under the Scenic Status Column, the second row states: "Portion east of I-15 is an Eligible State Scenic Highway within San Bernardino and Riverside Counties."	The description for SR-91 was swapped with the description for I-15. Please swap the two descriptions as follows: Portion east of I-15 is an Eligible State Scenic Highway within San Bernardino and Riverside Counties. <u>Portion south of State Route 91 is an Eligible State Scenic Highway within Riverside County.</u>	Proposed edits are intended for technical accuracy as it appears that the description for SR-91 is actually that of the I-15.
4.1.1.2	4.1-28	Under the Circle City Substation (Photographs 1 through 6) heading, the sixth sentence of the first paragraph states:	For clarification, please revise as follows:	Proposed edits are intended for technical accuracy as the existing line at the substation site is a distribution line.

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		"An open field with stockpiled soil and oak trees can be seen in the middleground along with an existing subtransmission line."	An open field with stockpiled soil and oak trees can be seen in the middleground along with an existing subtransmission <u>distribution</u> line.	
4.3.1.4	4.3-5	The last sentence of the last paragraph states: With regard to Alternative C3 (Subtransmission-Level Battery Storage), the 50 MW subtransmission-level battery storage facility would be located approximately 270 feet eastnortheast of the Christian Heritage School and approximately 50 feet south of residences along Pleasant View Avenue; the 42 MW subtransmission-level battery storage facility would be located approximately 500 southwest of the closest building associated with Corona High School	Please revise as follows: With regard to Alternative C3 (Subtransmission-Level Battery Storage), the 50 MW subtransmission-level battery storage facility would be located approximately 270 feet eastnortheast of the Christian Heritage School and approximately 50 feet south of residences along Pleasant View Avenue; the 42 MW subtransmission-level battery storage facility would be located approximately 500 <u>feet</u> southwest of the closest building associated with Corona High School	Proposed edits are intended for clarity, denoting the unit of measure expressing the distance.
4.3.1.5	4.3-6	Under the heading Alternative Source Lines, the paragraph does not mention Alternative E4.	Please include a statement regarding Alternative E4 akin to the following: <u>Alternative E4 (Databank Source Lines Only) would expose the same sensitive receptors as the Project along Magnolia Avenue.</u>	Proposed edits are intended for clarity as this discussion of Alternative E4 does not currently include a description of sensitive receptors.
Impact 4.3-1	4.3-13	The first sentence of the third paragraph states: As described under Impacts 4.3-2, 4.6-3, and 4.3-6, the Project would result in significant impacts associated with construction emissions of criteria pollutants.	Please revise as follows: As described under Impacts 4.3-2, 4.3-4 4.6-3 , and 4.3-6, the Project would result in significant impacts associated with construction emissions of criteria pollutants.	Proposed edits are intended for clarity and to correct the reference to, what SCE presumes should be, Impact 4.3-4.
Impact 4.3-2	4.3-17	The third bullet of Mitigation Measure 4.3-2a states: Graded and/or excavated inactive areas of the construction site shall be monitored by SCAQMD air district or approved third party at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust;	Please revise as follows: Graded and/or excavated inactive areas of the construction site shall be monitored by SCAQMD air district or approved third party at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust;	Proposed edits are intended for technical accuracy as the SCAQMD does not provide services such as weekly on-site dust monitoring. Further, a monitor hired by SCE can ensure implementation of this measure and provide status reports to the CPUC.
4.3.4.1	4.3-17	The sixth bullet under Mitigation Measure 4.3-2a Fugitive Dust Controls, it states: All trucks hauling dirt, sand, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of at least 12 inches:	Please revise language as follows: All trucks hauling dirt, sand, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of at least 12 inches <u>with an exception for trucks not designed to be tarped, in which case, prior to transporting, applying water to the load to prevent fugitive dust shall be acceptable.</u>	Proposed edits are intended for technical accuracy as certain trucks (e.g., Belly Dumps) are not designed to be tarped and may cause a safety issue for personnel climbing on top of loads and risk a fall.
Impact 4.3-2	4.3-18	Mitigation Measure 4.3-2b states:	Please revise as follows:	Proposed edits are intended for technical accuracy as SCE may not know the exact equipment that will be

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		Mitigation Measure 4.3-2b: Construction Equipment Exhaust Reductions. For all diesel-fueled off-road construction equipment, SCE shall make a good faith effort to use available construction equipment that meets Tier 4, the highest USEPA-certified tiered emission standard. An Exhaust Emissions Control Plan that identifies each off-road unit’s certified tier specification and Best Available Control Technology (BACT) shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities. Construction activities cannot commence until the Plan has been approved. For all pieces of equipment that would not meet Tier 4 emission standards, the Exhaust Emissions Control Plan shall include recent documentation from at least two local heavy construction equipment rental companies that indicates that the companies do not have access to higher-tiered equipment for the given class of equipment.	Mitigation Measure 4.3-2b: Construction Equipment Exhaust Reductions. For all diesel-fueled off-road construction equipment, SCE shall make a good faith effort to use available construction equipment that meets Tier 4, the highest USEPA-certified tiered emission standard. An Exhaust Emissions Control Plan that identifies <u>requirements to maintain a log of</u> each off-road unit’s certified tier specification and Best Available Control Technology (BACT) shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities. Construction activities cannot commence until the Plan has been approved. For all pieces of equipment that would not meet Tier 4 emission standards, the Exhaust Emissions Control Plan shall include <u>requirements to provide</u> recent documentation from at least two local heavy construction equipment rental companies that indicates that the companies do not have access to higher-tiered equipment for the given class of equipment. <u>SCE shall make available to the CPUC a copy of the certified tier specification, BACT documentation, and/or CARB or SCAQMD operating permit for each piece of construction equipment, as applicable, at the time the equipment is mobilized.</u>	utilized 30 days prior to commencement of construction activities. SCE will however be capable of maintaining a log of equipment that may be reviewed by the CPUC.
Table 4.3-10	4.3-32	Under the “VOC” column, the “Threshold Exceeded?” row states: “Yes”	Please revise as follows: Yes -No	Proposed edits are intended for technical accuracy as the numbers show that the threshold is not exceeded.
Impact 4.8-1	4.8-10	The first sentence of the second paragraph states: “The short-term construction emissions estimates provided by SCE do not include indirect emissions estimates associated with the proposed use of 58 acre-feet of water for dust suppression, cleanup, crew member consumption, and hand washing (SCE, 2015; p. 4.17-10).”	SCE adjusted the water use estimate in response to Data Request No.2, Question 31A; please revise as follows: “The short-term construction emissions estimates provided by SCE do not include indirect emissions estimates associated with the proposed use of <u>107</u> 58 acre-feet of water for dust suppression, cleanup, crew member consumption, and hand washing (SCE, 2015; p. 4.17-10).”	Proposed edits are intended for technical accuracy consistent with SCE response to CPUC Data Request No. 2, Question 31A.
4.4.1.2	4.4-11	Under the Freshwater Marsh heading, the second sentence states: “Two patches of freshwater marsh occur within the study area—one along the proposed Mira Loma-Jefferson subtransmission line routes in the Prado Flood Control Basin and one along the alternative source line corridors around the quarry lake.”	For clarity, please revise as follows: “Two patches of freshwater marsh occur within the study area—one along the proposed Mira Loma-Jefferson subtransmission line routes in the Prado Flood Control Basin and one along the <u>Alternative E3 alignment near source line corridors</u> around the quarry lake.”	Proposed edit intended to clearly specify the names of the referenced Alternative.
4.4.1.7	4.4-29	The first sentence of the second paragraph states: Portions of the proposed Circle City Substation site, the Substation Site Alternative, and the Source Route Alternative 3 occur within the MSHCP Proposed Constrained Linkage 4.	Please revise as follows: Portions of the proposed Circle City Substation site, the <u>Alternative D2 Substation Site Alternative</u> , and the Source Route <u>Alternative E3</u> occur within the MSHCP Proposed Constrained Linkage 4.	Proposed edit intended to clearly specify the names of the referenced Alternative.

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Impact 4.4-3	4.4-49 through 4.4-50	<p>Mitigation Measure 4.4-3b states:</p> <p>Mitigation Measure 4.4-3b: If vernal pool fairy shrimp or Riverside fairy shrimp are identified in the Project area and impacts to occupied pools cannot be avoided, SCE shall mitigate for impacts to vernal pool fairy shrimp habitat and comply with the requirements of the FESA through one or more of the following steps to provide compensatory habitat: (a) participation in the MSHCP to obtain take coverage for identified species, (b) salvage of cysts and creation of replacement pool habitat in the local area at a replacement ratio of at least 3:1, (c) restoration of affected pools onsite after the completion of construction, or (d) acquisition of credits from an approved mitigation bank within the Project region.</p> <p>If occupied habitat for the above species is encountered at a Project site, to mitigate for temporary or permanent loss of aquatic sites, SCE shall implement the following measures:</p> <ul style="list-style-type: none"> SCE shall mitigate for the loss of branchiopod habitat that will be filled or otherwise directly affected by the project by providing compensatory habitat. SCE shall develop and implement a mitigation, monitoring, and management plan, with input from regulatory agencies that shall outline long-term management strategies and performance standards to be attained to compensate for habitat losses resulting from the project. At a minimum, the plan shall include standards for mitigation site selection and construction specifications for mitigation sites, a description of site conditions including aerial maps, an analysis of local branchiopod habitat, and performance criteria by which site quality can be assessed over time (e.g., size, vegetation species present, date of initial ponding, ponding duration, and wildlife usage). A monitoring program will be established to track the development of habitat conditions that are conducive to the establishment of vernal pool branchiopods. To the greatest practicable extent, SCE or its contractors shall construct compensation habitat (i.e., replacement pools) before habitat disturbances are incurred; or directly within the project footprint after construction. A qualified biologist shall ensure that ponds are functioning as designed. SCE shall submit the name and credentials of a biologist qualified to act as construction monitor to USFWS for approval at least 15 days before construction work begins. With concurrence from the USFWS, a USFWS-approved biologist shall salvage soils from sites that are known to support vernal pool 	<p>Please revise as follows:</p> <p>Mitigation Measure 4.4-3b: If vernal pool fairy shrimp or Riverside fairy shrimp are identified in the Project area and impacts to occupied pools cannot be avoided, SCE shall mitigate for impacts to vernal pool fairy shrimp habitat and comply with the requirements of the FESA through one or more of the following steps to provide compensatory habitat: (a) participation in the MSHCP to obtain take coverage for identified species, (b) salvage of cysts and creation of replacement pool habitat in the local area at a replacement ratio of at least 3:1, (c) restoration of affected pools onsite after the completion of construction, or (d) acquisition of credits from an approved mitigation bank within the Project region.</p> <p>If occupied habitat for the above species is encountered at a Project site, to mitigate for temporary or permanent loss of aquatic sites, SCE shall implement the following measures:</p> <p><u>Compensatory or Restoration</u></p> <ul style="list-style-type: none"> SCE shall mitigate for the loss of branchiopod habitat that will be filled or otherwise directly affected by the project by providing compensatory habitat; <u>or</u>, SCE shall develop and implement a mitigation, monitoring, and management plan, with input from regulatory agencies that shall outline long-term management strategies and performance standards to be attained to compensate for habitat losses resulting from the project. At a minimum, the plan shall include standards for mitigation site selection and construction specifications for mitigation sites, a description of site conditions including aerial maps, an analysis of local branchiopod habitat, and performance criteria by which site quality can be assessed over time (e.g., size, vegetation species present, date of initial ponding, ponding duration, and wildlife usage). A monitoring program will be established to track the development of habitat conditions that are conducive to the establishment of vernal pool branchiopods. To the greatest practicable extent, SCE or its contractors shall construct compensation habitat (i.e., replacement pools) before habitat disturbances are incurred; or directly within the project footprint after construction. A qualified biologist shall ensure that ponds are functioning as designed. <p><u>Construction Activities</u></p> <ul style="list-style-type: none"> SCE shall submit the name and credentials of a biologist qualified to act as construction monitor to USFWS for approval at least 15 days before construction work begins. 	<p>Proposed edits are intended for technical accuracy and to clarify the requirements listed in the bullets between construction activities and compensation activities. Further, it appeared that both onsite restoration and compensatory mitigation would be required.</p>



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		<p>branchiopods at least 2 weeks before the onset of construction, or during the preceding dry season if pools are anticipated to hold water when construction begins. The salvaged soil samples will be stored and used to inoculate created pools once minimum performance standards are met at these locations.</p> <ul style="list-style-type: none"> A USFWS-approved biologist shall be present at each active work site within 0.5-mile of potential fairy shrimp habitat until habitat disturbance has been completed. Thereafter, the contractor or SCE shall designate a person to monitor onsite compliance with all minimization measures. A USFWS-approved biologist shall ensure that this individual receives training consistent with USFWS requirements. A USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of fairy shrimp and their habitat, the importance of these species and their habitat, the general measures that are being implemented to conserve fairy shrimp as they relate to the project, and the boundaries within which the project construction shall occur. <p>All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any fairy shrimp habitat.</p>	<ul style="list-style-type: none"> If restoration is proposed to compensate for habitat loss, wWith concurrence from the USFWS, a USFWS-approved biologist shall salvage soils from sites that are known to support vernal pool branchiopods at least 2 weeks before the onset of construction, or during the preceding dry season if pools are anticipated to hold water when construction begins. The salvaged soil samples will be stored and used to inoculate created pools once minimum performance standards are met at these locations. A USFWS-approved biologist shall be present at each active work site within 0.5-mile of potential fairy shrimp habitat until habitat disturbance has been completed. Thereafter, the contractor or SCE shall designate a person to monitor onsite compliance with all minimization measures. A USFWS-approved biologist shall ensure that this individual receives training consistent with USFWS requirements. A USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of fairy shrimp and their habitat, the importance of these species and their habitat, the general measures that are being implemented to conserve fairy shrimp as they relate to the project, and the boundaries within which the project construction shall occur. <p>All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any fairy shrimp habitat.</p>	
Impact 4.4-5	4.4-53	<p>The third sentence in the fourth paragraph states:</p> <p>"Impacts to critical habitat within San Bernardino County are unlikely since the Project alignments avoid riparian vegetation and poles other structures are placed within developed areas."</p>	<p>Please revise as follows:</p> <p>"Impacts to critical habitat within San Bernardino County are unlikely since the Project alignments avoid riparian vegetation and poles <u>and</u> other structures are placed within developed areas."</p>	Proposed edits are intended for clarity.
Impact 4.4-9	4.4-58	<p>Mitigation Measure 4.4-9a states:</p> <p>Mitigation Measure 4.4-9a: Apply Restoration Planning Methodology identified in Mitigation Measure 4.4-5c to Non-riparian Special-status Vegetation, which includes Riversidean Sage Scrub.</p>	<p>Please revise as follows:</p> <p>Mitigation Measure 4.4-9a: <u>Should SCE opt to participate in the MSHCP, a</u>Apply Restoration Planning Methodology identified in Mitigation Measure 4.4-5c to Non-riparian Special-status Vegetation <u>that is not fully covered under the MSHCP, which includes Riversidean Sage Scrub.</u></p>	Proposed edits are intended for technical accuracy as some special-status vegetation, including Riversidean Sage Scrub would be fully mitigated through payment of mitigation fees and would not require additional mitigation. If SCE impacts vegetation that is not fully covered by the MSHCP, a DBESP would be developed.
Impact 4.4-12	4.4-61	<p>Mitigation Measure 4.4-12 states:</p> <p>"Mitigation Measure 4.4-12: SCE shall ensure that a preconstruction survey for roosting bats shall be conducted by a qualified biologist prior to construction activities to characterize potential bat habitat and identify</p>	<p>Please revise as follows:</p> <p>Mitigation Measure 4.4-12: SCE shall ensure that a preconstruction survey for roosting bats shall be conducted by a qualified biologist prior to construction activities to characterize potential bat habitat and identify</p>	Proposed edits are intended for technical accuracy and to clarify that the 100 foot no-disturbance buffer only applies to active maternity roosts. This change is consistent with the mitigation approach described in the last sentence of the paragraph and the detailed

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		active roost sites. Surveys shall be conducted within 100 feet of construction activities. If an active bat roost being used for maternity is found within 100 feet of the construction activities, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active by the qualified biologist. Should potential roosting habitat or active bat roosts be found in trees to be removed or trimmed or poles to be replaced under the Project, SCE shall implement the following measures:	active roost sites. Surveys shall be conducted within 100 feet of construction activities. If an active bat roost being used for maternity is found within 100 feet of the construction activities, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active <u>maternity roosts</u> by the qualified biologist. Should potential roosting habitat or active <u>non-maternity</u> bat roosts be found in trees to be removed or trimmed or poles to be replaced under the Project, SCE shall implement the following measures:	measures in MM 4.4-12 bullets 1 – 5 which pertain to "potential roosting habitat or active bat roosts".
MM 4.5-1	4.5-26	Mitigation Measure 4.5-1 states: Mitigation Measure 4.5-1: Prior to commencing Project-related construction activities associated with the Pedley Source Lines or the Alternative E4 telecommunication line, an architectural historian meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History shall assist Project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444) located in or adjacent to the Project Area – these contributing elements to the District shall subsequently be avoided during Project implementation.	Please revise as follows: Mitigation Measure 4.5-1: Prior to commencing Project-related construction activities associated with the Pedley Source Lines or the Alternative E4 telecommunication line, an architectural historian meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History shall assist Project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444) located in or adjacent to the Project Area – these contributing elements to the District shall subsequently be avoided during Project implementation. <u>Management of this resource will be captured in the Cultural Resources Management Plan (CRMP). The CRMP would include all management recommendations to avoid impacts to the District, including steps taken if changes during construction result in impacts to the contributing elements or character defining features of the District, and plotting the District’s contributing elements on construction plans.</u>	Proposed edits are intended to specify a more robust plan (the referenced CRMP) for managing this resource during construction. Plans change, and a certain amount of flexibility in the avoidance/minimization/ mitigation for this resource is warranted. Resources like this are traditionally managed and/or captured in the project’s CRMP.
4.5.5.2 Impact 4.5-2	4.5-27	The second to last sentence of the paragraph states: Such significant impacts would be reduced to a less-than-significant level by implementing Mitigation Measure 4.5-2, which would require, in the event of an inadvertent discovery of archaeological resources, a qualified archaeologist to assess any previously undiscovered archaeological resources and, if determined to potentially be an historical resource, avoid the resource if feasible, or, if avoidance is not feasible, consult with Native American tribes (if the resource is Native American-related) and determine treatment measures, which may include conducting data recovery of the resource.	Please revise as follows: Such significant impacts would be reduced to a less-than-significant level by implementing Mitigation Measure 4.5-2, which would require, <u>the development of a CRMP that would describe cultural resource requirements as they pertain to unanticipated discoveries, defining work stoppage, field methods, timelines, resource management and treatment, monitoring plans, data reporting, and tribal engagement in the event of an inadvertent</u> discovery of archaeological resources, a qualified archaeologist to assess any previously undiscovered archaeological resources and, if determined to potentially be an historical resource, avoid the resource if feasible, or, if avoidance is not feasible, consult with Native American tribes (if the resource is Native American-related) and determine treatment measures, which may include conducting data recovery of the resource.	Proposed edits are intended for consistency and to capture proposed revisions to MM 4.5-2, discussed below.

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MM 4.5-2	4.5-27 through 4.5-28	<p>Mitigation Measure 4.5-2 states:</p> <p>Mitigation Measure 4.5-2: If prehistoric or historic-era archaeological resources are encountered during Project implementation, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance. The CPUC and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.</p> <p>If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC §21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.</p> <p>If avoidance is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American-related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). This shall include documentation of the resource and may include data recovery or other measures. Any treatment other than preservation in place must be approved by the CPUC and the appropriate tribe if applicable. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource. The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of approved treatment and under the direction of the qualified archaeologist.</p>	<p>SCE proposes to replace Mitigation Measure 4.5-2 as follows:</p> <p>Mitigation Measure 4.5-2: If prehistoric or historic-era archaeological resources are encountered during Project implementation, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance. The CPUC and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.</p> <p>If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC §21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.</p> <p>If avoidance is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American-related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). This shall include documentation of the resource and may include data recovery or other measures. Any treatment other than preservation in place must be approved by the CPUC and the appropriate tribe if applicable. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource. The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of approved treatment and under the direction of the qualified archaeologist.</p> <p><u>Develop Cultural Resource Management Plan (CRMP) – SCE shall prepare and submit for approval a Cultural Resource Management Plan (CRMP) to guide all</u></p>	<p>In place of MM 4.5-2 as written, SCE proposes that a Cultural Resource Management Plan (CRMP) be created, which would reduce the risk of construction delays and potential disruptions to the impacted communities, while addressing all aspects of a project’s cultural resource requirements as they pertain to unanticipated discoveries, defining work stoppage, field methods, timelines, resource management and treatment, monitoring plans, data reporting, and tribal engagement prior to construction.</p>

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			<p><u>cultural resource management activities during project construction. Management of cultural resources shall follow the state standards and guidelines established in California Public Resources Code Sections 21083.2, 21084.1-.3, and California Environmental Quality Act Section 15064.5, and Appendix G. The CRMP shall be submitted to the CPUC for review and approval at least 30 days prior to the start of construction. The CRMP shall include, but not be limited to, the following sections:</u></p> <ol style="list-style-type: none"> 1. <u>Cultural Resource Monitoring and Field Reporting: Detail procedures for archaeological monitoring, reporting matrix, and when monitoring is no longer necessary. Include guidelines for monitoring in Areas of High Sensitivity for discovery of buried NRHP and/or CRHR eligible cultural resources, including burials, cremations, or sacred sites.</u> 2. <u>Unanticipated Discovery Protocol: Detail procedures for halting construction, defining work stoppage zones, notifying stakeholders (e.g. agencies, Native Americans, utilities), and assessing NRHP and/or CRHR eligibility in the event unanticipated discoveries are encountered during construction. Include methods, timelines for assessing NRHP and/or CRHR eligibility, formulating mitigation plans, and implementing treatment. Mitigation and treatment plans for unanticipated discoveries shall be reviewed by appropriate Native American tribes and approved by the CPUC, prior to implementation.</u> 3. <u>Data Analysis and Reporting: Detail methods for data analysis in a regional context, reporting of results within one year of completion of field studies, curation of artifacts and data (maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by the CPUC, and dissemination of reports to appropriate repositories.</u> 	
MM 4.5-4	4.5-30	<p>The second bullet under Mitigation Measure 4.5-4 states:</p> <p>Qualified personnel shall monitor excavations in areas identified as having moderate to high sensitivity for paleontological resources, and in areas mapped as Qaf, Qw, Qf, Qyw, Qyf, Qya, or Qye but which include excavations greater than 10 feet deep.</p>	<p>SCE recommends the following edits:</p> <p>Qualified personnel shall monitor excavations (<u>except drilling activities</u>) in areas identified as having moderate to high sensitivity for paleontological resources, and in areas mapped as Qaf, Qw, Qf, Qyw, Qyf, Qya, or Qye but which include excavations greater than 10 feet deep.</p>	<p>Proposed edits are intended for technical accuracy as the likelihood of observing and recovering significant fossils from drilling and augering activities is low.</p>

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4.5.6.3	4.5-39	<p>The second paragraph under Alternative D1 states:</p> <p>In contrast to the proposed Project, Alternative D1 would not impact the Grand Boulevard Historic District (P-33-006444), an historical resource. Alternative D1 does not include any construction, operation, or maintenance-related activities in or in the immediate vicinity of the District. Therefore, under Alternative D1, Impact 4.5-1 would be less than significant, and no mitigation would be required.</p>	<p>Alternative D1 would include the construction of a second telecommunications route as described for Alternative E4. SCE recommends that this paragraph be replaced with the analysis provided under Alternative E4.</p> <p>In contrast to the proposed Project, Alternative D1 would not impact the Grand Boulevard Historic District (P-33-006444), an historical resource. Alternative D1 does not include any construction, operation, or maintenance-related activities in or in the immediate vicinity of the District. Therefore, under Alternative D1, Impact 4.5-1 would be less than significant, and no mitigation would be required.</p> <p><u>Although the impact on the Grand Boulevard Historic District (P-33-006444) would be avoided under this alternative due to the removal of the Pedley Source Lines, a portion of the Grand Boulevard Historic District (P-33-006444), as defined in CEQA Guidelines Section 15064.5, could be impacted to a lesser extent by the Alternative D1 telecommunications line, which would include the addition of overhead telecommunication lines on 39 existing wood distribution poles primarily along East 3rd Street, Quarry Street, West 2nd Street, and W Grand Boulevard. This would not result in the addition of a new visual change to the historic setting of the District, and no resultant indirect visual impacts to cultural resources would occur. The majority of the underground construction component of the telecommunications line would include installation within an existing underground duct bank system in Grand Boulevard and West 3rd Street, with only approximately 1,300 feet of new underground duct bank required within the District. Alternative D1 would result in similar potential impacts to sidewalks, curbs and gutters, and historic period landscaping and trees. However, it could still result in a substantial adverse change to the significance of the District, a significant impact that would be reduced to a less-than significant level through implementation of Mitigation Measure 4.5-1 (Impact 4.5-1; Class II).</u></p>	<p>Proposed edits are intended for technical accuracy as the description is missing analysis of second telecommunications route.</p>
4.5.6.3	4.5-39	<p>Under the heading Alternative D1:12 kV Distribution-Level Battery Storage, the text states:</p> <p>Because this alternative would include substantially less underground trenching, and overall ground-disturbance, when compared to the proposed Project,</p>	<p>Please revise as follows:</p> <p>Because this alternative would include substantially less underground trenching, and overall ground-disturbance, when compared to the proposed Project,</p>	<p>Proposed edits are intended for technical accuracy as the second telecom line required for the alternative does not have substantially less ground disturbance.</p>
Impact 4.6-1	4.6-7	<p>Mitigation Measure 4.6-1 states:</p>	<p>Please revise as follows:</p>	<p>SCE provides these edits to make clear that the types of “qualified professionals” that could serve to</p>

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		Mitigation Measure 4.6-1: SCE shall contract a qualified professional (i.e., construction planner/energy efficiency expert) to prepare a Construction Equipment Efficiency Plan that identifies the specific measures that SCE (and its construction contractors) will implement as part of Project construction to increase the efficient use of construction equipment to the maximum extent feasible. Such measures shall include, but not necessarily be limited to: procedures to ensure that all construction equipment is properly tuned and maintained at all times; a commitment to utilize existing electricity sources where feasible rather than portable diesel-powered generators; and identification of procedures (including the routing of haul trips) that shall be followed to ensure that all materials and debris hauling is conducted in a fuel-efficient manner. The plan shall be submitted to CPUC for review and approval at least 30 days prior to the beginning of construction activities.	Mitigation Measure 4.6-1: SCE shall contract a qualified professional (i.e. , e.g., construction planner/energy efficiency expert, <u>Air Quality specialist, etc.</u>) to prepare a Construction Equipment Efficiency Plan that identifies the specific measures that SCE (and its construction contractors) will implement as part of Project construction to increase the efficient use of construction equipment to the maximum extent feasible. Such measures shall include, but not necessarily be limited to: procedures to ensure that all construction equipment is properly tuned and maintained at all times; a commitment to utilize existing electricity sources where feasible rather than portable diesel-powered generators; and identification of procedures (including the routing of haul trips) that shall be followed to ensure that all materials and debris hauling is conducted in a fuel-efficient manner. The plan shall be submitted to CPUC for review and approval at least 30 days prior to the beginning of construction activities.	develop the energy efficiency plan are not limited to construction planners and/or “energy efficiency experts.”
4.7.1.1	4.7-1	Under Regional Geology, a sentence in the 2 nd paragraph states: "The Circle City Substation site is underlain by young alluvial channel deposits of the Temescal Wash, which range from fine grained mixtures of silt, sand, and some gravel, to coarse alluvium containing sand, gravel, cobbles and boulders (TDBU, 2012)."	Please change sentence to clarify geology underlying site (per referenced report) as: "The Circle City Substation site is underlain by <u>a thin mantle of un-compacted fill overlying</u> young alluvial channel deposits of the Temescal Wash, which range from fine grained mixtures of silt, sand, and some gravel, to coarse <u>granular</u> alluvium containing sand, gravel, cobbles and boulders <u>mixtures</u> (TDBU, 2012)."	Proposed edits are intended for technical accuracy and to clarify the nature of the geologic conditions, consistent with the referenced report.
4.7.1.2	4.7-1	Under Faults, the 2 nd sentence states: "Figure 4.7-1 provides an illustration of mapped faults in the area of the proposed Project."	Please change sentence to clarify the faults shown on the figure as: "Figure 4.7-1 provides an illustration of <u>the major</u> mapped <u>earthquake</u> faults in the area of the proposed Project."	Proposed edits are intended for technical accuracy as Figure 4.7.1 only shows the major Alquist Priolo (AP) faults and associated zones, i.e., not all mapped faults are shown.
4.7.1.2	4.7-2	Figure 4.7-1 is titled "Earthquake Faults and Hazard in the Project Vicinity"	Please revise title as follows: "Earthquake Faults and Hazard <u>Zones</u> in the Project Vicinity"	Proposed edits are intended for technical accuracy and to make clear that the figure refers to the AP Earthquake Fault Zones.
4.7.1.3	4.7-4	Under Soils, the first sentence states: "Overlying the geologic units described above is a layer of soil."	Please revise sentence to correctly reference the geologic units sections as: " <u>Soils overlying</u> Overlying the geologic units described <u>in Section 4.7.1.1, Regional Geology, within the Project Area.</u> above is a layer of soil. "	Proposed edits are intended for technical accuracy and clarity as the previous section discusses Faulting.
4.7.1.3	4.7-4	Under Soils, within the 4 th paragraph, it states: "It was determined that the Circle City Substation site is in an area underlain by a thin mantle of un-compacted fill overlying young alluvial channel deposits of the Temescal Wash. Uncompacted fill was encountered	Please revise the sentence to match the previous soil description from Section 4.7.1.1: " <u>It was determined that the Circle City Substation site is underlain by a thin mantle of un-compacted fill overlying young alluvial channel deposits of the</u>	Proposed edits are intended for technical accuracy and to consistently address the onsite soil descriptions.

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		to a depth of about 2 feet, under which lay approximately 4 feet of generally fine grained, silt, sand, and gravel mixtures. Coarsely granular alluvium consisting of sand, gravel, cobble, and boulder mixtures to a depth of 28 feet were encountered below the top 6 feet (TDBU, 2012)."	Temescal Wash, which range from fine grained mixtures of silt, sand, and some gravel, to coarse granular alluvium containing sand, gravel, cobbles and boulders mixtures (TDBU, 2012).that the Circle City Substation site is in an area underlain by a thin mantle of un-compacted fill overlying young alluvial channel deposits of the Temescal Wash. Uncompacted fill was encountered to a depth of about 2 feet, under which lay approximately 4 feet of generally fine grained, silt, sand, and gravel mixtures. Coarsely granular alluvium consisting of sand, gravel, cobble, and boulder mixtures to a depth of 28 feet were encountered below the top 6 feet (TDBU, 2012). "	
4.7.1.3	4.7-13	Under Soils, last paragraph of Section, it states: "Testing indicated the site soils have very low expansion potential, and no geotechnical recommendations were made (TDBU, 2012)."	Please revise sentence to clarify as: "Testing indicated the site soils have very low expansion potential, and <u>therefore</u> no mitigation measures geotechnical recommendations were <u>required</u> made (TDBU, 2012)."	Proposed edits are intended for clarity and consistency with the referenced report.
4.7.1.4	4.7-17	Under Landslides, last sentence in Section, it states: Also, the site topography is relatively level and the absence of nearby slopes precludes any slope stability hazards; the potential for seismically-induced landslides at any of the Project alignments or sites is considered low (TBDU Geotechnical Engineering Group, 2012).	Please revise sentence to clarify the reference to the Circle City Substation report as: "Also, the site topography is relatively level and the absence of nearby slopes precludes any slope stability hazards; the potential for seismically-induced landslides at any of the Project <u>subtransmission</u> alignments or sites is considered low. <u>In addition, the potential for seismically-induced landslides within the Circle City Substation site is also considered low</u> (TBDU Geotechnical Engineering Group, 2012)."	Proposed edits are intended for technical accuracy and to make clear that the referenced report covers the substation site and not the project alignments.
4.17	4.17-1	First sentence in Section Regional Roadways states: Riverside County is linked to Los Angeles and Orange counties primarily by State Route 60 (SR 60), Interstate 10 (I-10), SR 91, and SR 74.	Please revise as follows: Riverside County is linked to Los Angeles and Orange counties primarily by State Route 60 (SR 60), Interstate 10 (I-10), SR 91, and SR 74 <u>71</u> .	Proposed edits are intended for correct erroneous reference to SR 71.
Impact 4.17-1	4.17-12	The first paragraph of Mitigation Measure 4.17-1 states: Mitigation Measure 4.17-1: SCE shall prepare and implement a Traffic Management Plan subject to approval of Caltrans and/or the applicable local government(s), including agencies that operate alternative modes of transportation (e.g., North Main Corona Metrolink Station, the Corona Cruiser/RTA bus route, and the Metrolink Rail path). The approved Traffic Management Plan and documentation of agency approvals shall be submitted to the CPUC prior to the commencement of construction activities. At a minimum, the plan shall:	Please revise as follows: Mitigation Measure 4.17-1: <u>As part of any required encroachment permit</u> , SCE shall prepare and implement a Traffic Management Plan subject to approval of Caltrans and/or the applicable local government(s), including agencies that operate alternative modes of transportation (e.g., North Main Corona Metrolink Station, the Corona Cruiser/RTA bus route, and the Metrolink Rail path). The approved Traffic Management Plan and documentation of agency approvals shall be submitted to the CPUC prior to the commencement of construction activities. At a minimum, the plan shall:	Traffic management plans as mitigation measures should only be required where encroachment permits are required.

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4.9.5	4.9-33	<p>Last sentence in subheading Alternative B: Mira Loma-Jefferson 66 kV Subtransmission Line without Substation states:</p> <p>“In addition, potential impacts related to electric shocks would be decreased under this alternative and would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects.”</p>	<p>Please revise as follows:</p> <p>“In addition, potential impacts related to <u>static-like</u> electric shocks would be decreased under this alternative and would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects <u>within the 500 kV ROW.</u>”</p>	<p>Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.</p>
4.9.5	4.9-34	<p>The last two sentences in subheading Alternative C1: Underground 66kV Subtransmission Line along Hellman Avenue states:</p> <p>“In addition, potential impacts related to electric shocks would be decreased under this alternative due to the line being installed underground. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects.”</p>	<p>Please revise as follows:</p> <p>“In addition, potential impacts related to <u>static-like</u> electric shocks would be decreased under this alternative due to the line being installed underground. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects <u>within the 500 kV ROW.</u>”</p>	<p>Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.</p>
4.9.5	4.9-37	<p>The last two sentences in subheading Alternative C2: 66kV Subtransmission Line along Archibald Avenue states:</p> <p>“In addition, potential impacts related to electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects.”</p>	<p>Please revise as follows:</p> <p>“In addition, potential impacts related to <u>static-like</u> electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects <u>within the 500 kV ROW.</u>”</p>	<p>Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.</p>
4.9.5	4.9-39	<p>The last paragraph in subheading Alternative C3: 66kV Subtransmission-Level Battery Storage states:</p> <p>“In addition, potential impacts related to electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact</p>	<p>Please revise as follows:</p> <p>“In addition, potential impacts related to <u>static-like</u> electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact</p>	<p>Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately</p>

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		4.9-8; Class II), which would require electrical grounding of metallic objects.”	4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects <u>within the 500 kV ROW.</u> ”	adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
4.9.5	4.9-40	The last paragraph in subheading Alternative D1: 12kV Distribution-Level Battery Storage states: “In addition, potential impacts related to electric shocks would be decreased under this alternative due to the reduce amount of overhead lines that would be installed compared to the proposed Project. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects.”	Please revise as follows: “In addition, potential impacts related to <u>static-like</u> electric shocks would be decreased under this alternative due to the reduce amount of overhead lines that would be installed compared to the proposed Project. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects <u>within the 500 kV ROW.</u> ”	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
4.9.5	4.9-41	The last sentence subheading Alternative D2: 66kV Substation Site Alternative states: “Potential impacts related to electric shocks would be the same as the Project with implementation of Mitigation Measure 4.9-8 (Class II), which would require electrical grounding of metallic objects.”	Please revise as follows: “Potential impacts related to <u>e static-like</u> electric shocks would be the same as the Project with implementation of Mitigation Measure 4.9-8 (Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects.”	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
4.9.5	4.9-43	The last two sentences in subheading Alternative E1: Quarry Street 66 kV Source Line Segment states : “In addition, although there would be no potential impacts related to electric shocks associated with the underground segment, the overall impact associated with the overhead segments of the source lines and the Mira Loma-Jefferson subtransmission line would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects.”	Please revise as follows: “In addition, although there would be no potential impacts related to <u>static-like</u> electric shocks associated with the underground segment, the overall impact associated with the overhead segments of the source lines and the Mira Loma-Jefferson subtransmission line would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects.”	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
4.9.5	4.9-44	The last paragraph in subheading Alternative E2: Underground Pedley 66 kV Source Line from I-15 to Circle City Substation states:	Please revise as follows:	Proposed edits are intended for clarity and to more accurately characterize the type and severity of

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		“In addition, although there would be no potential impacts related to electric shocks associated with the underground segment, the overall impact associated with the overhead segments of the source lines and the Mira Loma-Jefferson subtransmission line would be mitigated to a less-than significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects.”	“In addition, although there would be no potential impacts related to <u>static-like</u> electric shocks associated with the underground segment, the overall impact associated with the overhead segments of the source lines and the Mira Loma-Jefferson subtransmission line would be mitigated to a less-than significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects.”	electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
4.9.5	4.9-45, 46	The last paragraph in subheading Alternative E3: Southern 66 kV Source Line Alignment states: “In addition, the potential for impacts related to electric shocks associated with Alternative E3 would be increased compared to the Project given the longer length of overhead line compared to the proposed Databank Source Lines. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects.”	Please revise as follows: “In addition, the potential for impacts related to <u>static-like</u> electric shocks associated with Alternative E3 would be increased compared to the Project given the longer length of overhead line compared to the proposed Databank Source Lines. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects.”	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
4.9.5	4.9-47	The last two sentences in subheading Alternative E4: Databank 66 kV Source Lines Only states: “In addition, potential impacts related to electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects.”	Please revise as follows: “In addition, potential impacts related to <u>static-like</u> electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of <u>large or long paralleling</u> metallic objects.”	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
Impact 4.9-8	4.9-30	Third sentence in this paragraph states: When a person or animal comes in contact with a conductive object a perceptible current or small electric shock may occur.	Please revise as follows: When a person or animal comes in contact with a conductive object a perceptible current or small <u>static-like</u> electric shock may occur.	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful.
4.9.4	4.9-31	Entire section states:	Please revise as follows:	Proposed edits are intended for clarity and to more accurately characterize the type and severity of

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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
		Mitigation Measure 4.9-8: As part of the siting and construction process, SCE shall identify objects, such as fences, metal buildings, pipelines, etc. that are within the ROW that have the potential for induced voltages and shall implement electrical grounding of metallic objects in accordance with Cal/OSHA Electrical Safety Orders at 8 CCR 2739. The identification of objects shall be provided to the CPUC at least 30 days prior to the commencement of construction, and shall document the thresholds of electric field strength and metallic object size at which grounding becomes necessary.	Mitigation Measure 4.9-8: As part of the siting and construction process, SCE shall identify objects, such as fences, metal buildings, pipelines, etc. that are within the <u>500 kV</u> ROW that have the potential for induced voltages <u>that would likely lead to static-like electrical shock</u> and shall implement electrical grounding of <u>those</u> metallic objects in accordance with Cal/OSHA Electrical Safety Orders at 8 CCR 2739. The identification of objects shall be provided to the CPUC at least 30 days prior to the commencement of construction, and shall document the thresholds of electric field strength and metallic object size at which grounding becomes necessary.	electrical shocks potentially at issue. Edits distinguish “electric shock,” which could cause serious injury or death from the “static-like electric shocks,” which are not harmful. Further, only large size or long paralleling metallic objects within or immediately adjacent to the 500 kV ROW would need to be grounded. There is no significant static-like electric shock issue with 66 kV line outside of the 500 kV ROW.
4.9.1.5	4.9-6 and 4.9-8	Entire section on Electric and Magnetic Fields 4.9.1.5 Electric and Magnetic Fields Electromagnetic fields (EMFs) are associated with electromagnetic radiation, which is energy in the form of photons. Radiation energy spreads as it travels and has many natural and human-made sources. The electromagnetic spectrum, the scientific name given to radiation energy, includes light, radio waves, and x-rays, among other energy forms. Electric and magnetic fields are common throughout nature and are produced by all living organisms. Concern over EMF exposure, however, generally pertains to human-made sources of electromagnetism and the degree to which they may have adverse biological effects or interfere with other electromagnetic systems. Commonly known human-made sources of EMF are electrical systems, such as electronics and telecommunications, as well as electric motors and other electrically powered devices. Radiation from these sources is invisible, non-ionizing, and of low frequency. Generally, in most environments, the levels of such radiation added to natural background sources are low. Electric voltage (electric field) and electric current (magnetic field) from transmission lines create EMFs. Power frequency EMF is a natural consequence of electrical circuits and can be either directly measured using the appropriate measuring instruments or calculated using appropriate information. On January 15, 1991, the California Public Utilities Commission (CPUC) initiated an investigation to consider its role in mitigating the health effects, if any, of electric and magnetic fields from utility facilities and power lines. A working group of interested parties, the California EMF Consensus Group, was created by the CPUC to advise it on this issue. The California EMF Consensus Group’s fact-finding process was open to the public, and	Please delete Section 4.9.1.5 Electric and Magnetic Fields in its entirety. 4.9.1.5 Electric and Magnetic Fields Electromagnetic fields (EMFs) are associated with electromagnetic radiation, which is energy in the form of photons. Radiation energy spreads as it travels and has many natural and human-made sources. The electromagnetic spectrum, the scientific name given to radiation energy, includes light, radio waves, and x-rays, among other energy forms. Electric and magnetic fields are common throughout nature and are produced by all living organisms. Concern over EMF exposure, however, generally pertains to human-made sources of electromagnetism and the degree to which they may have adverse biological effects or interfere with other electromagnetic systems. Commonly known human-made sources of EMF are electrical systems, such as electronics and telecommunications, as well as electric motors and other electrically powered devices. Radiation from these sources is invisible, non-ionizing, and of low frequency. Generally, in most environments, the levels of such radiation added to natural background sources are low. Electric voltage (electric field) and electric current (magnetic field) from transmission lines create EMFs. Power frequency EMF is a natural consequence of electrical circuits and can be either directly measured using the appropriate measuring instruments or calculated using appropriate information. On January 15, 1991, the California Public Utilities Commission (CPUC) initiated an investigation to consider its role in mitigating the health effects, if any, of electric and magnetic fields from utility facilities and power lines. A working group of interested parties, the California EMF Consensus Group, was created by the CPUC to advise it on this issue. The California EMF Consensus Group’s fact-finding process was open to the public, and its report incorporated public concerns. Its recommendations were filed with	Proposed edits are intended for technical accuracy as there is no established evidence that environmental exposure of EMF is harmful to human beings. Furthermore, EMF is already addressed in Section 2 (Project Description), as well as the Field Management Plan for this project included in the Appendix to the DEIR. An overhead 66kV circuit is unlikely to interfere with any implanted medical device, including pacemakers.

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A20-140

Mira Loma-Jefferson 66kV Line and Circle City Substation Project
DRAFT ENVIRONMENTAL IMPACT REPORT ~ SCE COMMENTS

Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
		<p>its report incorporated public concerns. Its recommendations were filed with the CPUC in March 1992. Based on the work of the California EMF Consensus Group, written testimony, and evidentiary hearings, CPUC’s decision (93-11-013) was issued on November 2, 1993, to address public concern about possible EMF health effects from electric utility facilities. In August of 2004, the CPUC opened an Order Instituting Rulemaking to update the Commission’s policies and procedures related to electric and magnetic fields emanating from regulated utility facilities. The final decision, D.06-01-042, was issued in January 2006. The conclusions and findings included the following:</p> <p>“We find that the body of scientific evidence continues to evolve. However, it is recognized that public concern and scientific uncertainty remain regarding the potential health effects of EMF exposure. We do not find it appropriate to adopt any specific numerical standard in association with EMF until we have a firm scientific basis for adopting any particular value.”</p> <p>This continues to be the stance of the CPUC regarding standards for EMF exposure. Since the decision was issued, the State has not determined that any risk would merit adoption of any specific limits or regulations regarding EMF levels from electric power facilities. In the interim, the CPUC Decision 06-01-042 requires that no-cost and low-cost steps be incorporated into project design to reduce EMF. The decision directs that no-cost mitigation measures be undertaken, and that low-cost options be implemented through the project certification process. Four percent of total project budgeted cost is the benchmark in developing EMF mitigation guidelines, and mitigation measures should achieve some noticeable reductions.</p> <p>With regard to indirect effects on health, EMF of sufficient magnitude can impact operation of a few older model pacemakers, thus causing the pacemaker to revert to asynchronous pacing. However, asynchronous pacing can occur associated with exposure to transmission line voltages of 400 kV or higher (St. Jude Medical, 2012). Given that the proposed Project would include subtransmission facilities rated at 66 kV and less, the issue of asynchronous pacing is not addressed further in this EIR.</p>	<p>the CPUC in March 1992. Based on the work of the California EMF Consensus Group, written testimony, and evidentiary hearings, CPUC’s decision (93-11-013) was issued on November 2, 1993, to address public concern about possible EMF health effects from electric utility facilities. In August of 2004, the CPUC opened an Order Instituting Rulemaking to update the Commission’s policies and procedures related to electric and magnetic fields emanating from regulated utility facilities. The final decision, D.06-01-042, was issued in January 2006. The conclusions and findings included the following:</p> <p>“We find that the body of scientific evidence continues to evolve. However, it is recognized that public concern and scientific uncertainty remain regarding the potential health effects of EMF exposure. We do not find it appropriate to adopt any specific numerical standard in association with EMF until we have a firm scientific basis for adopting any particular value.”</p> <p>This continues to be the stance of the CPUC regarding standards for EMF exposure. Since the decision was issued, the State has not determined that any risk would merit adoption of any specific limits or regulations regarding EMF levels from electric power facilities. In the interim, the CPUC Decision 06-01-042 requires that no-cost and low-cost steps be incorporated into project design to reduce EMF. The decision directs that no-cost mitigation measures be undertaken, and that low-cost options be implemented through the project certification process. Four percent of total project budgeted cost is the benchmark in developing EMF mitigation guidelines, and mitigation measures should achieve some noticeable reductions.</p> <p>With regard to indirect effects on health, EMF of sufficient magnitude can impact operation of a few older model pacemakers, thus causing the pacemaker to revert to asynchronous pacing. However, asynchronous pacing can occur associated with exposure to transmission line voltages of 400 kV or higher (St. Jude Medical, 2012). Given that the proposed Project would include subtransmission facilities rated at 66 kV and less, the issue of asynchronous pacing is not addressed further in this EIR.</p>	
Impact 4.10-3	4.10-22	<p>The first sentence under the Linear Facilities heading states:</p> <p>Construction of the proposed linear Project facilities, such as the source lines, Mira Loma-Jefferson subtransmission line, and distribution getaways, would temporarily alter drainage patterns across the construction areas, including activity in the Santa Ana River corridor during</p>	<p>For consistency with the Project description, please revise as follows:</p> <p>Construction of the proposed linear Project facilities, such as the source lines, Mira Loma-Jefferson subtransmission line, and distribution getaways, would temporarily alter drainage patterns across the construction areas,</p>	<p>Proposed edits are intended for technical accuracy and consistency with the Project Description.</p>

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Mira Loma-Jefferson 66kV Line and Circle City Substation Project
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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
		construction and installation of two H-frames and one light-weight steel (LWS) pole.	including activity in the Santa Ana River corridor during construction and installation of two H-frames and one <u>eleven</u> light-weight steel (LWS) poles.	
4.13.1.3	4.13-8	Under the heading Summary of Sensitive Receptors – Subtransmission Line Alignment Alternatives, the first four sentences state: "Alternative C1 (Underground Hellman Avenue) would expose the same sensitive receptors as the Project along the proposed Mira-Loma Jefferson subtransmission line alignment. Alternative C2 (Archibald Avenue) would occur adjacent to residential receptors along Archibald Avenue between Belgrave Avenue and the Santa Ana River. The route would occur in a southeasterly direction along the Mir Loma-Jefferson subtransmission line alignment exposing the same receptors as described for the Project. With regard to Alternative 3C (Subtransmission-Level Battery Storage), the 50 MW subtransmission-level battery storage facility would be located..."	For clarification, please revise as follows: "Alternative C1 (Underground Hellman Avenue) would expose the same sensitive receptors as the Project along the proposed Mira_Loma_Jefferson subtransmission line alignment. Alternative C2 (Archibald Avenue) would occur adjacent to residential receptors along Archibald Avenue between Belgrave Avenue and the Santa Ana River. The route would occur in a southeasterly direction along the Mira Loma-Jefferson subtransmission line alignment exposing the same receptors as described for the Project. With regard to Alternative C3 (Subtransmission-Level Battery Storage), the 50 MW subtransmission-level battery storage facility would be located..."	Proposed edits are intended for clarity and to correct the name of the subtransmission line.
4.13.1.3	4.13-9	Under the heading Summary of Sensitive Receptors – Alternative Source Lines, the paragraph does not mention Alternative E4.	Please include the following statement regarding Alternative E4: <u>"Alternative E4 (Databank Source Lines Only) would expose the same sensitive receptors as the Project along Magnolia Avenue."</u>	Proposed edits are intended for technical accuracy as the Alternative E4 sensitive receptors are not described.
Impact 4.13-2	4.13-25 through 4.13-26	The last paragraph states: "Significance after Mitigation: Although several components of Mitigation Measures 4.13-2a and 4.13-2b would likely reduce the annoyance that would be associated with increased ambient noise levels associated with loud construction activities, it is not possible to firmly substantiate that implementation of Mitigation Measures 4.13-2a and 4.13-2b would achieve the noise level reductions needed to mitigate the impact to a less than-significant level. Therefore, even with these mitigation measures, some daytime construction activities would likely exceed the construction noise threshold criterion, and nearly all nighttime construction activities within 400 feet of sensitive receptors would continue to exceed the construction noise threshold criteria. Therefore, the impact would be significant and unavoidable."	Please revise as follows: Significance after Mitigation: Although several components of Mitigation Measures 4.13-2a and 4.13-2b would likely reduce the annoyance that would be associated with increased ambient noise levels associated with loud construction activities, it is <u>unlikely not possible to firmly substantiate</u> that implementation of Mitigation Measures 4.13-2a and 4.13-2b would achieve the noise level reductions needed to mitigate the impact to a less than-significant level. Therefore, even with these mitigation measures, some daytime construction activities would likely exceed the construction noise threshold criterion, and nearly all nighttime construction activities within 400 feet of sensitive receptors would continue to exceed the construction noise threshold criteria. Therefore, the impact would be significant and unavoidable.	SCE agrees with the conclusions stated for Impact 4.13-2 and the finding that noise impacts would remain significant and unavoidable despite mitigation. However, SCE disagrees with the DEIR's suggestion that reasonable estimates of noise reductions resulting from the implementation of mitigation measures 4.13-2a and 2b are not possible. For example, the Federal Highway Administration (FHWA) has found that a noise barrier can achieve a 5 dB noise level reduction when it is tall enough to break the line-of-sight. A reasonable assumption can be made that implementation of Mitigation Measure 4.13-2a would reduce construction impacts by 5 dBA. Nevertheless, as the DEIR concludes, construction noise levels are expected to be as high as 87 dBA and thus implementation of MM 4.13-2a would not mitigate the impact to a less-than-significant level.
4.13.5.2	4.13-31	The mitigation measure for Alternative C3 states:	Please revise as follows:	Proposed edits are intended for technical accuracy as expected construction practices would involve

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A20-142

A20-143

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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR
		"Mitigation Measure 4.13-1: Should Alternative C3 be selected as part of the approved project, prior to commencement of construction activities, an 8-foot-high block wall shall be installed along the perimeter of the 50 MW and 42 MW subtransmission-level battery storage and substation sites. The wall shall attenuate construction and operational noise levels. SCE shall retain an acoustical engineer to perform noise measures in the vicinity of the residences to verify that the 50 MW and 42 MW subtransmission-level battery storage and substation operational noise levels comply with the City's nighttime exterior noise level limit of 50 dBA. Documentation of compliance shall be submitted to the CPUC no later than 60 days after the start of operations. In the event the facility noise levels violate the standards, additional noise control techniques shall be initiated to connect the violation."	"Mitigation Measure 4.13-1: Should Alternative C3 be selected as part of the approved project, prior to commencement of construction activities , an 8-foot-high block wall shall be installed along the perimeter of the 50 MW and 42 MW subtransmission-level battery storage and substation sites. <u>During grading activities, until the wall is constructed, a temporary construction noise barrier shall be utilized.</u> The temporary construction noise barrier and permanent wall shall attenuate construction and operational noise levels. SCE shall retain an acoustical engineer to perform noise measures in the vicinity of the residences to verify that the 50 MW and 42 MW subtransmission-level battery storage and substation operational noise levels comply with the City's nighttime exterior noise level limit of 50 dBA. Documentation of compliance shall be submitted to the CPUC no later than 60 days after the start of operations. In the event the facility noise levels violate the standards, additional noise control techniques shall be initiated to connect the violation."	finishing grading prior to construction of the block wall.
4.13.5.3	4.13-33	The mitigation measure for Alternative D2 states: "Mitigation Measure 4.13-2c: Should Alternative D2 be selected as part of the approved project, the 8-foot-high block wall that is part of the alternative shall be installed along the perimeter of the substation site prior to the commencement of substation construction activities."	Please revise the mitigation measure as follows: Mitigation Measure 4.13-2c: Should Alternative D2 be selected as part of the approved project, the 8-foot-high block wall that is part of the alternative shall be installed along the perimeter of the substation site <u>following grading activities, prior to the commencement of substation construction activities</u> prior to the commencement of substation construction activities . <u>During grading activities, until the wall is constructed, a temporary construction noise barrier shall be utilized.</u>	Proposed edits are intended for technical accuracy as expected construction practices would involve finishing grading prior to construction of the block wall.
Table 5-2	5-8	In the third row first column under Section 4.9 it states: "Impact 4.9-8: Induced currents associated with operation of the Project could generate electrical shocks."	Please revise as follows: Impact 4.9-8: Induced currents associated with operation of the Project could generate <u>static-like</u> electrical shocks.	Proposed edits are intended for clarity and to more accurately characterize the type and severity of electrical shocks potentially at issue. Edits distinguish "electric shock," which could cause serious injury or death from the "static-like electric shocks," which are not harmful.
5.2	5-2	The Distribution Service Objective states: Distribution Service Objective. Ensure that the Corona, Jefferson, and Chase substations do not exceed their combined capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.	Please revise as follows: <u>Maintain electrical system reliability by ensuring</u> Ensure that the Corona, Jefferson, and Chase substations do not exceed their combined capacity under peak electrical demand conditions through the 2017 to 2026 forecast period <u>and by increasing operational flexibility.</u>	Proposed edits are intended for clarity and consistency with comments made regarding DEIR Chapter 1.

A20-145 cont.

A20-146

A20-147

A20-148

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Section	Page	DEIR Language	SCE Recommended Language	Reason for Change in DEIR												
Table 5-3	5-14	<p>Table 5-3 states:</p> <table border="1"> <thead> <tr> <th>Alternative</th> <th>Applicant's Construction Cost Estimate</th> </tr> </thead> <tbody> <tr> <td>Proposed Project</td> <td>\$140 million</td> </tr> <tr> <td>Alternatives C1 and D1*</td> <td>\$100 to \$120 million (depending on battery storage facility size as determined during the Formal Proceeding for A. 15-12-007)</td> </tr> </tbody> </table> <p>NOTE: * Includes battery revenues from estimated energy arbitrage opportunities, and assumes that the proposed substation would not be constructed. Also includes \$1.7 million in additional costs for the underground segment of Alternative C1.</p>	Alternative	Applicant's Construction Cost Estimate	Proposed Project	\$140 million	Alternatives C1 and D1*	\$100 to \$120 million (depending on battery storage facility size as determined during the Formal Proceeding for A. 15-12-007)	<p>Please revise as follows:</p> <table border="1"> <thead> <tr> <th>Alternative</th> <th>Applicant's Construction Cost Estimate</th> </tr> </thead> <tbody> <tr> <td>Proposed Project</td> <td>\$140 million</td> </tr> <tr> <td>Alternatives C1 and D1*</td> <td>\$100 to \$120 to \$150 million (depending on battery storage facility size as determined during the Formal Proceeding for A. 15-12-007)</td> </tr> </tbody> </table> <p>NOTE: * <u>Battery revenues would be earned for the three options during the project cycle, depending on size of battery storage facility.</u> Includes battery revenues from estimated energy arbitrage opportunities, and <u>Assumes that the proposed substation would not be constructed.</u> Also includes \$2 million in additional costs for the underground segment of Alternative C1.</p> <p><u>The proposed project's substation would provide for operational flexibility by enabling the ability to reconfigure the distribution system and to transfer load from the area served by a substation to areas typically served by adjacent substations. Alternative D1 does not propose a substation and the battery installations would only offset load values in a very localized area and only for a short duration where it would then become a load while charging. This functionality would not provide for operational flexibility due to inability to transfer load and reconfigure the distribution as needed.</u></p> <p><u>Based on SCE's estimate of a \$140M (in 2018 constant \$) for SCE's proposed project, SCE's proposed project would be the most cost-effective to SCE ratepayers. SCE proposed substation has a useful life of 45 years whereas comparable battery projects equivalent in size to Options 2A and 2C would range from approximately \$160M to \$240M.</u></p>	Alternative	Applicant's Construction Cost Estimate	Proposed Project	\$140 million	Alternatives C1 and D1*	\$100 to \$120 to \$150 million (depending on battery storage facility size as determined during the Formal Proceeding for A. 15-12-007)	<p>Proposed edits are intended for technical accuracy and meant to correct the Construction Cost Estimate based on scope of CPUC Environmentally Superior Alternative and SCE subject matter expert cost estimates.</p>
Alternative	Applicant's Construction Cost Estimate															
Proposed Project	\$140 million															
Alternatives C1 and D1*	\$100 to \$120 million (depending on battery storage facility size as determined during the Formal Proceeding for A. 15-12-007)															
Alternative	Applicant's Construction Cost Estimate															
Proposed Project	\$140 million															
Alternatives C1 and D1*	\$100 to \$120 to \$150 million (depending on battery storage facility size as determined during the Formal Proceeding for A. 15-12-007)															

A20-149

Attachment 2

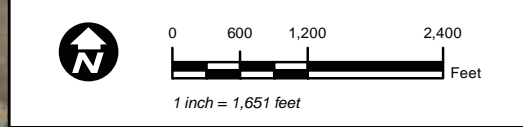
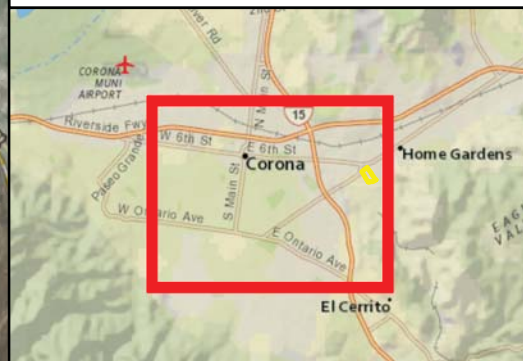
Telecommunications Route, Map 1

CIRCLE CITY SUBSTATION PROJECT

FIGURE 3-2B



- ▲ Existing Substation
- * Battery Storage
- Telecom**
- Existing, OH
- - - New Underground Fiber Alignment
- - - Existing Underground Fiber Alignment
- 50 MW-Corona Sub Tap 1 OH
- 50 MW-Corona Sub Tap 2 UG
- 50 MW-Corona Sub Tap 1 UG
- 42 MW-Jefferson Sub Route Tap 2 OH
- 42 MW-Jefferson Sub Route Tap 2 UG
- 42 MW-Jefferson Sub Tap 1 OH
- 42 MW-Jefferson Sub Tap 1 UG
- Electrical**
- Existing Single-Circuit Line
- Replaced with Double-Circuit Line
- New Double-Circuit 66kV Line



Date: 6/26/2018
 File Name: CCSP_DEIR_Figures3-2B_20180626.mxd
 Version #: 1
 Created By: J. Le
Real Properties Geospatial Analysis

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Attachment 3

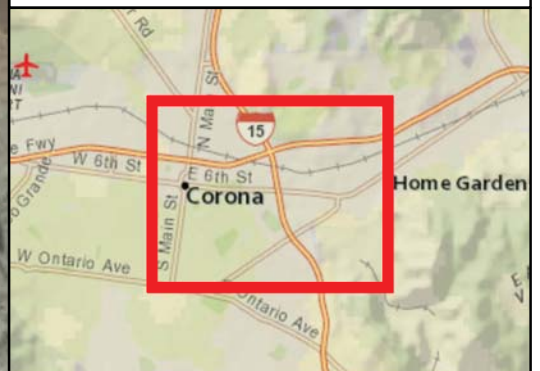
Telecommunications Route, Map 2

CIRCLE CITY SUBSTATION PROJECT

FIGURE 3-3



- New Vault
- Existing Overhead 12kV Pole
- Telecom**
- Existing, OH
- - - New Underground Fiber Alignment
- - - Existing Underground Fiber Alignment
- Electrical**
- Existing Overhead 12kV Line
- - - Existing Underground 12kV Line
- New Underground 12kV Line
- New Battery Storage Site
- Proposed Substation Site
- Property Line



Date: 6/26/2018
 File Name: CCSP_DEIR_Figure3-3_20180626.mxd
 Version #: 1
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3.2.20 Letter A20 – Responses to Comments from Southern California Edison

A20-1 The comment is an introductory paragraph that acknowledges the commenter is SCE, the Applicant of the Project, and that its Draft EIR comments are included in its comment letter and accompanied table. Comment noted.

A20-2 The commenter indicates that Alternative D1, 12 kV Distribution-Level Battery Storage, may not be an appropriate solution to the proposed Project, and that the proposed Project is the best solution to meet the project objectives set forth in SCE's Proponent's Environmental Assessment (PEA).

Refer to responses to Comments A20-10 through A20-13.

A20-3 SCE acknowledges that some sort of battery storage solution may be satisfactory to serve the distribution need in the electrical needs area (ENA) through 2031, but suggests that the Circle City Substation should also be constructed to serve as back-up.

Refer to response to Comment A20-10 through A20-13.

A20-4 SCE requests that the Final EIR “move forward” Alternative D3, which includes construction of both the 12 kV Distribution-Level Battery Storage facility with Circle City Substation, and that the Final EIR contain an appropriate analysis of its environmental impacts.

Alternative D3 was considered in the alternatives development and screening processes conducted for the Draft EIR; however, as discussed in Draft EIR Project Alternatives Section 3.5.2.2, *Rational for Elimination*, Alternative D3 would not reduce any of the significant short-term construction (i.e., air quality and noise) or long-term aesthetics impacts that would be associated with the proposed Project, and due to the extra electrical infrastructure that would be required, the scope of construction activities under Alternative D3 would be increased compared to the Project, as would the associated short-term significant air quality impacts.

For these reasons, this alternative was eliminated from further consideration in the Draft EIR and has not been moved forward for detailed analysis in the Final EIR.

For discussion relative to operational flexibility, reliability, and cost effectiveness of the proposed Project versus Alternatives D1 or D3, refer to responses to Comments A20-15 through A20-17, A20-19, and A20-22.

A20-5 This comment is a summary statement of an overview of SCE's comments on the Draft EIR. For discussion of the Project Objectives, refer to responses to Comments A20-10 through A20-13; and for discussion relative to Alternative C3

being evaluated in detail in the Draft EIR, refer to responses to Comments A20-23 through A20-25.

- A20-6 This comment is a summary statement of SCE’s comments regarding the Project Objectives. Please see responses to Comments A20-10 through A20-13 for a response to SCE’s substantive comments.

For discussion relative to operational flexibility and reliability of the proposed Project versus Alternatives D1, refer to responses to Comments A20-15 through A20-17 and A20-19.

- A20-7 The commenter suggests that the Draft EIR alternatives may not increase system reliability or operational flexibility, as well as increase capacity at peak demand times; and therefore should be dismissed as viable alternatives.

CEQA Guidelines Section 15126.6(a) requires that an “EIR shall describe a range of reasonable alternatives to the project [...] which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” In this comment, SCE claims the alternatives may not meet the primary objectives at all times; however, CPUC’s basic CEQA Project objectives are discussed in Comment A20-6 above, and the *Consistency with Project Purposes and Objectives* discussion provided in Section 3.2.2 of the Draft EIR specified that “each project alternative would have to meet at least one of the two objectives [identified by the CPUC].” The Draft EIR considered a reasonable range of potentially feasible alternatives discussed in Draft EIR Section 3.2.3. The CPUC’s approach of analyzing feasible alternatives that meet one of the two objectives satisfies CEQA Guidelines Section 15126.6(a) requirements of feasibly attaining most of the basic objectives of the project.

These issues are addressed in response to Comments A20-15 through A20-17 and A20-19.

- A20-8 The comment states the Draft EIR improperly carries Alternative C3 through further analysis and that because the Draft EIR concludes that this alternative would not reduce significant and unavoidable impacts related to air quality and noise beyond that of the proposed Project, this alternative should not be carried forward. Please see response to Comments A20-23 through A20-25 for detailed responses related to these issues.

- A20-9 The comment is a summary of legal standards governing the analysis of alternatives in draft environmental impact reports. The CPUC concurs with the summary and has conducted its alternatives screening process for the Draft EIR consistent with the identified legal standards.

- A20-10 The CPUC acknowledges SCE’s project objectives as identified in its PEA in support of its Application for a Permit to Construct (PTC) the proposed Project.

- A20-11 CEQA Guidelines Section 15124 requires that an EIR contain a “statement of the objectives sought by the proposed project [...] The statement of objectives should include the underlying purpose of the project.” It is within the discretion of the Lead Agency to select objectives for the project. As stated in *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.App.4th 1143, 1163, “The process of selecting the alternatives to be included in the EIR begins with the establishment of project objectives by the lead agency.” The CPUC’s consideration of SCE’s objectives is discussed in Section 1.3.2 of the Draft EIR, *Project Objectives*. In Section 1.3.2 the Draft EIR explains that the CPUC considered “the Applicant’s objectives, electrical demand projections, and other laws and regulations” to identify CPUC’s basic CEQA Project objectives. It is acknowledged that the Project objectives used in the Draft EIR alternatives screening analysis are not those identified by SCE, but rather were developed by the CPUC to represent the underlying purpose of the proposed Project.
- A20-12 The comment states the Draft EIR Project objectives detract from SCE’s goals of providing for load transfers among various substations within the ENA, minimizing environmental impacts, and meeting need in a cost-effective manner. SCE’s Comments A20-15 through A20-17 and A20-19 provide further detail regarding this issue (see response to Comments A20-15 through A20-17 and A20-19). Additionally, the Draft EIR does not serve to “advance” any particular alternative. The Draft EIR analyzes and compares the environmental impacts of the various alternatives and the proposed Project. The Commission will consider the conclusions in the EIR, along with other evidence in the record, prior to making a final decision on SCE’s application.
- A20-13 The Draft EIR does not favor one alternative over another or over the proposed Project. Rather, based on the environmental analysis presented in Draft EIR Chapter 4, *Environmental Analysis*, Draft EIR Chapter 5, *Comparison of Alternatives*, identifies the environmentally superior alternative, which is based solely on a comparison of environmental impacts of the alternatives and the proposed Project. At the time of project approval, the CPUC will consider the environmental analysis in the EIR, along with other evidence in the record before it regarding the operational attributes and cost-effectiveness of the proposed Project and the Alternatives.
- The CPUC does not consider the project objectives identified in SCE’s PEA to be appropriate CEQA objectives for the Project. Therefore, the alternatives analysis has not been revised as requested. Refer to response to Comments A20-10 through A20-12.
- A20-14 The comment is an introductory statement that suggests the proposed Circle City Substation, or Alternative D3, are the only solutions that would provide operational flexibility needed to offload capacity from the other substations in the ENA during peak conditions, would reduce risk, and would be reliable in a cost effective

manner. For responses to SCE's detailed comments regarding these issues, refer to responses to Comments A20-15 through A20-17, A20-19, and A20-22.

- A20-15 The commenter states that the proposed Circle City Substation design would allow for offsetting electrical demand by transferring load between and among the adjacent substations at any given time to balance loading between the substations within the Project's ENA and would allow for temporary load transfers during planned outages of distribution facilities (e.g., maintenance, repairs, etc.), as well as provide capacity to restore electrical service during unplanned outages of distribution facilities. The capabilities of the proposed Circle City Substation are noted.
- A20-16 It is acknowledged that battery storage facilities, such as would be developed under Alternative D1, have certain limitations compared to distribution substations; however, they can also provide a number of services that distribution substations cannot. Based on the comment received, it remains unclear how the limitations discussed by the Applicant would in any way limit the ability of Alternative D1 to ensure the distribution project objective is met for at least the 10 year planning horizon.

In the case of Alternative D1, the circuits that would connect the battery storage facility to the 12 kV distribution electrical grid are served by Chase Substation, one of the three ENA substations that are connected to each other with 66 kV subtransmission lines. The battery storage facility would allow SCE to directly transfer distribution load from Chase Substation through the use of existing 12 kV distribution circuits, because the Chase, Jefferson, and Corona substations are connected by 66 kV subtransmission lines. The transferred load from Chase Substation would have the capability to benefit the other ENA substations through load transfers between Jefferson or Corona substations and Chase Substation to balance the load.

Subsequent to providing its comment letter on the Draft EIR, SCE provided additional information at the request of the CPUC regarding the benefits of a system that can perform continuous (i.e., permanent) load transfers, such as would occur with the Circle City Substation under the proposed Project, versus temporary load transfers, such as those that would occur under Alternative D1 (SCE, 2018d). SCE explained that when load would be permanently re-allocated in the electrical needs area due to the proposed Circle City Substation and its distribution circuits, the process would systematically reshape the coverage areas of the existing substations through use of permanent cascading load transfers. Because these load transfers would take significant time to plan, model, scope, permit, and construct, SCE considers the proposed load transfers to be permanent for normal operating conditions (SCE, 2018d).

Although the battery storage facilities would not be able to continuously transfer load between the ENA substations, which is neither an SCE-identified Project objective nor an EIR Project objective, the facility would be available to alleviate load for up to several hours a day during off-peak periods as well as during peak periods. Therefore, in addition to addressing peak load demands associated with the EIR Distribution Service Objective, it is reasonable to conclude the battery storage facilities could also be used to allow for temporary load transfers during planned outages of distribution facilities, as well as provide limited capacity to restore electrical service during unplanned outages.

However, SCE has explained that it considers a limitation of a battery storage facility to be that if for any reason the batteries connected to a circuit are not available after the load transfers due to performance or maintenance issues, battery failure, or an outage that cuts off the batteries from the grid, the peak load on that circuit would be higher than intended and would be overloaded. For example, a contingency event could occur, such as a car accident taking a distribution pole out of service that could cause an outage to two or more of the connected battery installations. This could remove much of the installed battery storage capacity from service at both the circuit level and at the Chase Substation level causing circuit overloads, substation overloads, and possible load shedding. During such an event, it would be typical for the adjacent circuits to be used to assist in restoring electrical service to the circuit(s) that experienced the unplanned outage, but this may not be possible due to high loading values on the adjacent circuits or may result in the inability to operate all of the battery resources during the abnormal condition (SCE, 2018d).

Another issue identified by SCE in its subsequent communication to the CPUC is that if the adjacent circuits could be used to assist in restoring electrical service to a portion of the affected circuit while repairs were being made, and the adjacent circuit is also connected to batteries, this single distribution circuit may have up to 10 megawatts (MW) of battery storage capacity connected to it. Large amounts of distributed energy resources on a circuit can result in high voltage conditions for the customers served by the circuit, and the capacity would likely have to be reduced to ensure SCE could maintain voltage to its customers within the acceptable ranges as required by its Rule 2 filing 5 with the CPUC (SCE, 2018d).

With permanent load transfers from a substation that would occur within the broader ENA, SCE contends that similar issues associated with serving the load during fairly common distribution circuit outages, such as discussed above, would not be expected to occur. This is because the capacity resources (substation transformers) would be within the substation itself and would be subject to far less exposure to outages than the battery installations connected to distribution circuits, whose availability are subject to circuit related outages. Additionally, SCE contends that with a substation solution, loading on the distribution circuits would be expected to remain a consistent value, and would maintain the necessary electrical “headroom” to provide assistance and operational flexibility (SCE, 2018a).

SCE indicates that the battery storage shortcomings identified above would become especially important after 2031, which is the date SCE has identified when the Alternative D1 battery storage facility would be expected to no longer defer the need for the substation, and that it is imperative that a substation alternative be included. Based on SCE's battery storage analysis and its power flow forecast studies conducted for the project (see Draft EIR Section 3.4.4.1, Alternative D1: 12 kV Distribution-Level Battery Storage), the CPUC does not dispute that Alternative D1 may no longer be effective in its reliability function after 2031 and that a separate long-term solution such as a substation, may be needed at that time. However, given the unknown variables beyond the current 10-year forecast period of 2018 through 2027 (e.g., specific growth-inducing projects and local economic conditions), load forecasting for years beyond 2027, including year 2031, is considered to be speculative. Therefore, it is not possible to state with certainty whether or not Alternative D1 would continue to be a viable alternative to the proposed substation beyond year 2031.

Although the battery storage facilities under Alternative D1 would be unable to perform the reliability functions described by SCE above, the CPUC does not view these reliability functions as an essential underlying purpose of the proposed Project. For example, it is unlikely that SCE would propose the Project to address the reliability functions described above if the peak electrical capacity of the ENA substations would not be exceeded during the forecast period.

- A20-17 The commenter indicates that although the proposed Project would have greater reliability function than Alternative D1, the alternative could defer the need for a substation until 2031 as long as capacity needs for the ENA do not exceed the forecasted need, but SCE prefers that the proposed Circle City Substation at least be considered as a designated backup solution in the event the batteries do not perform as needed. Comment noted.
- A20-18 Refer to responses to Comments A20-17 and A20-19.
- A20-19 SCE's comment states that Alternative D1 would subject its customers in the ENA to a risk that SCE would not be able to provide them with reliable electricity service because it is unsure how the Alternative D1 distribution-level battery storage facility would perform under the various possible conditions it would face and whether the batteries would function consistently throughout their useful life because SCE has limited operational experience with battery storage facilities.

Upon request, SCE provided additional information subsequent to the submittal of its Draft EIR comments stating, "SCE would expect to gain invaluable and unprecedented operational experience through deployment of the battery storage" facility under Alternative D1 once it would be integrated into the distribution grid and functioning together with existing facilities to address capacity needs under peak and off-peak periods as well as during normal and abnormal system

conditions, but SCE contends that it is currently too speculative to quantify the battery-associated risk until some level of that experience is gained (SCE, 2018e). However, SCE also indicated that the risk of operational uncertainties would be minimal in the initial years, under the assumption that the battery storage facilities would be installed prior to the anticipated date when a capacity deficit is forecasted. For example, if the battery storage facilities were installed in 2021 and the first year of a capacity deficit was 2023, SCE would have approximately 2 years of operational experience with little-to-no risk of load being unserved should the batteries not perform as expected, if unaccounted for system operational conditions were to occur, or if there were only moderate variations in the current peak load forecast (SCE, 2018e).

Additionally, SCE responded in data requests that it currently owns and operates twelve battery storage facilities similar in technology and circumstance to that described for Alternative D1 (Table 3.3-1). The combined size of these storage facilities is about 60 MWs, and they provide a storage capacity of more than 140 MWh. Since at least 2011, SCE has continuously gained operational experience and knowledge associated with battery storage facilities. As shown in Table 3.3-1, SCE gained experience from early battery storage projects that had operations and maintenance issues, but operations and maintenance of the more recently installed (e.g., 2016) battery storage facilities have been “routine” (SCE, 2018f).

In addition, Table 3.3-1 does not list the hundreds of additional energy storage facilities operating within SCE’s service territory, which amount to more than 350 MWs and a much larger total energy capacity (megawatt hours), although total energy capacity was not provided by SCE in response to CPUC Energy Division data requests. SCE does not own many of these additional facilities, but they have been operating within SCE’s electric system and are connected both in-front-of-the-meter and behind-the-meter at the customer, distribution, and transmission domains (*grid domains*).¹ Facilities that SCE does not own still provide SCE with important operational experience. Among the additional 350 MWs of energy storage facilities in operation are those connected pursuant to SCE’s *Rule 21*² obligations.

According to SCE’s public data, the first energy storage facility for which an interconnection agreement was executed with SCE was a 2 MW facility in Orange County. This occurred in 2008 (SCE Rule 21/WDAT interconnection que as of 10/2/2018). By approximately 2022, SCE’s public data indicates that about

¹ The term, “grid domains,” refers to the three levels of the electric system at which an energy storage device may be interconnected—behind the *customer* meter, on the utility *distribution* system, or on the *transmission* system (Decision D.18-01-003).

² Electric Rule 21 describes the interconnection, operating, and metering requirements for generation facilities to be connected to a utility’s distribution system over which the CPUC has jurisdiction. Interconnected generation may be classified as *non-export* under the CPUC/SCE Electric Rule 21 tariff or *export* under the Federal Energy Regulatory Commission WDAT—Wholesale Distribution Access Tariff (<https://www.sce.com/wps/portal/home/business/generating-your-own-power/Grid-Interconnections/Interconnecting-Generation-under-Rule-21>).

**TABLE 3.3-1
SCE OWNED AND OPERATED BATTERY STORAGE FACILITIES SIMILAR IN TECHNOLOGY AND CIRCUMSTANCE TO ALTERNATIVE D1**

Project Name	City Location	Functional Purpose	Facility Size		Commercial Operation Date	Summary of Maintenance and/or Operational Issues or Comments
			MW	MWh		
Large Storage Test	Westminster	Other Grid Reliability	2.00	0.50	2011	Early first generation of containerized Lithium-ion energy storage (both containers built in approximately 2009). There were several issues including: Power Conversion System (PCS) was a motor drive unit adapted to energy storage application and there were several AC filtering capacitor failures, several power stage failures, several battery rack DC component failures, and several Battery Management System (BMS) failures. Several battery submodule/weak cell failures required submodule replacement. System is nearing 10 years old and some BMS and PCS parts are becoming scarce affecting ability to maintain and/or repair. Multiple chiller unit failures occurred; multiple failures of variable speed drives of fans. Several failures of compressor units, water temperature sensors, and control boards were experienced too.
Catalina Island Battery Storage	Avalon	Other Grid Reliability	1.00	7.20	2012	None.
Irvine Smart Grid-Community Energy Storage	Irvine	Other Grid Reliability	0.03	0.05	2013	No major issues with unit in field. Some stability issues occurred with dedicated manufacturer-provided back-office controller.
Irvine Smart Grid-Residential Energy Storage Unit	Irvine	Other Grid Reliability	0.06	0.18	2013	First ever in industry UL-listed Lithium-ion residential energy storage. There were several issues including: network interface issues requiring frequent restarts to keep network connections; multiple human machine interface (HMI) touchscreen failures; several battery module and other hardware replacements.
Tehachapi Storage Project	Tehachapi	Other Grid Reliability	8.00	32.00	2014	SCE's first large-scale Lithium-ion battery energy storage system (BESS) as well as the BESS manufacturer's first deployment. Several issues were observed: Multiple BMS bugs identified and addressed in SCE's test lab (prior to field deployment). Custom 12,000/480 Volt transformers arrived with a design flaw and required redesign and replacement. Some early issues with PCS air filtration system in dusty environment required more frequent filter changes. Many battery rack DC component (non-battery) failures affected reliability. Some battery module replacements were required. Network connection stability issues occurred between BESS system and SCE corporate SCADA systems.
Irvine Smart Grid-Containerized Energy Storage	Irvine	Other Grid Reliability	2.00	0.50	2014	Early first generation of containerized Lithium-ion energy storage (both containers built in approximately 2009). There were several issues including: PCS was a motor drive unit adapted to energy storage application and there were several AC filtering capacitor failures, several power stage failures, several battery rack DC component failures, and several BMS failures. Several battery submodule/weak cell failures required submodule replacement. System is nearing 10 years old and some BMS and PCS parts are becoming scarce affecting ability to maintain and/or repair. Multiple chiller unit failures occurred; multiple failures of variable speed drives of fans. Several failures of compressor units, water temperature sensors, and control boards were experienced too.
Distribution Energy Storage Integration 1	Orange	Capital Deferral	2.40	3.90	2015	There were several issues including: liquid-cooled PCS leaks requiring multiple attempts by PCS manufacturer to modify design and then fix; custom PCS enclosure had initial dust infiltration issues requiring a retrofit.

**TABLE 3.3-1 (CONTINUED)
 SCE OWNED AND OPERATED BATTERY STORAGE FACILITIES SIMILAR IN TECHNOLOGY AND CIRCUMSTANCE TO ALTERNATIVE D1**

Project Name	City Location	Functional Purpose	Facility Size		Commercial Operation Date	Summary of Maintenance and/or Operational Issues or Comments
			MW	MWh		
Mira Loma (Tesla)	Ontario	Market	20.00	80.00	2016	To date, the maintenance on this site has been routine. Most non-routine problems have been communications related. SCE is working with the vendors to assess the issue.
SCE Center EGT	Norwalk	Market	10.00	4.30	2016	To date, the maintenance on this sites has been routine. Most non routine problems have been communications related. SCE is working with our vendors to assess the issue.
SCE Grapeland EGT	Rancho Cucamonga	Market	10.00	4.30	2016	To date, the maintenance on this sites has been routine. Most non routine problems have been communications related. SCE is working with our vendors to assess the issue.
Distribution Energy Storage Integration 2	Santa Ana	Other Grid Reliability	1.40	3.70	2018	Expected in-service date is Third Quarter 2018.
Mercury 4	Lancaster	Other Grid Reliability	2.80	5.60	2018	Expected in-service date is Third Quarter 2018.
Mercury 1	Pico Rivera	Capital Deferral	3.00	9.00	TBD	Not yet operational.
Mercury 2	Pico Rivera	Capital Deferral	3.50	8.75	TBD	Not yet operational.
Mercury 3	NP	Other Grid Reliability	2.50	4.50	TBD	Not yet operational.
Gemini 1	NP	Other Grid Reliability	3.60	3.78	TBD	Not yet operational.
Gemini 2	NP	Other Grid Reliability	3.60	3.78	TBD	Not yet operational.
Gemini 3	Bridgeport	Other Grid Reliability	3.50	3.70	TBD	Not yet operational.
Apollo 1	NP	Other Grid Reliability	3.60	3.78	TBD	Not yet operational.
Apollo 2	NP	Other Grid Reliability	3.60	3.78	TBD	Not yet operational.

NOTES:

TBD = to be determined as one or more of the following apply: not yet approved via 2018 SCE General Rate Case filed with the CPUC or commercial operation date otherwise not yet determined.

NP = not provided by SCE.

All of the identified projects use lithium-ion battery storage technology except for the Catalina Island Battery Storage Project, which uses Sodium Sulfur (NaS) Battery technology.

SOURCE: SCE, 2018f.

3.2 gigawatts³ of energy storage will be operating within their service territory, and more than 3.0 gigawatts of the total will be lithium-ion technology. The majority of the storage facilities through 2022 will be behind-the-meter, but about 135 MWs of the behind-the-meter storage will be under SCE operational control, and SCE uses behind-the-meter resources to meet its obligations for *Resource Adequacy*—adequate generation resources available to reliably meet forecast load (see <http://www.cpuc.ca.gov/RA>). SCE will own or contract for about 500 MWs of the 3.2 gigawatt total, and about 220 MWs of the 500 MWs is expected to be under SCE operational control (SCE, 2018f).⁴

A20-20 To clarify, Alternative D1 would not include any grading at the proposed Circle City Substation site. The only grading that would be associated with Alternative D1 would be the first approximately 700 feet of the access driveway from Leeson Lane along the northeastern perimeter of the property, which would also benefit the proposed Circle City Substation, should the substation be constructed at a later date. For this reason, and the fact that the proposed Circle City Substation would include construction of overhead 66 kV source lines, which would result in long-term significant aesthetics impacts, the CPUC does not agree that minimal incremental environmental impacts would occur should the substation be constructed after the Alternative D1 facilities are constructed.

A20-21 The comment is a summary statement that suggests the costs associated with Alternative D1 would eventually surpass the costs that would be associated with the proposed substation. For the response relative to SCE’s concerns on costs, refer to responses to Comments A20-22 and A20-149. Additionally, at the time of project approval, the CPUC will consider the evidence in the record before it regarding the cost-effectiveness of the proposed Project and the Alternatives.

A20-22 SCE indicates that costs of the batteries may surpass the costs of the substation, and that the installed batteries would still only be capable of providing 20 MW of power capacity versus the 72 MW of power capacity that would be available from Circle City Substation, and that the proposed substation would be expected to address all long-term capacity demands of the ENA, while the batteries would only serve demand for a defined period, after which time the substation would still be required. SCE contends that this dynamic would make the alternative less cost-effective compared to the proposed Project.

The comment does not include a quantification of the expected costs that would be associated with Alternative D1 versus the proposed Project. The cost efficiency of

³ SCE stated that “projects which have not proceeded beyond an interconnection request are considered speculative, so they are not included” with the data describing the 3.2 gigawatts of storage to be operational through approximately 2022 within SCE’s service territory (SCE, 2018f). Hence, the total amount of storage that may be operational in the timeframe may be greater than 3.2 gigawatts.

⁴ At this time, SCE defines “operational control” as applicable to projects for which SCE is either bidding into the CAISO market and/or performing distribution deferral dispatches or testing.

the proposed Project in terms of dollars per MW capacity is not relevant to the EIR's conclusions relative to the identification of the environmentally superior alternative. However, at the time of project approval, the CPUC will consider the evidence in the record before it regarding the cost-effectiveness of the proposed Project and the Alternatives.

For additional discussion relative to costs, refer to response to Comment A20-149.

- A20-23 The comment states that Alternative C3 increases significant environmental impacts compared to both SCE's proposed Project and Alternative C1, and requests that Alternative C3 be removed from further consideration.

As stated in Draft EIR Section 3.4.3.3, *Alternative C3: 66 kV Subtransmission-Level Battery Storage*, Alternative C3 was selected as one of the alternatives to be analyzed in detail in the Draft EIR because it would address the Subtransmission Service Objective, it would avoid environmental impacts along the proposed Mira Loma-Jefferson subtransmission line alignment, and because it is potentially feasible. The Draft EIR impact analyses for Alternative C3 concluded that although Alternative C3 would avoid the significant aesthetics impact along Hellman Avenue associated with the proposed Project, it would result in its own new, more severe long-term aesthetics and noise impacts (see Draft EIR Sections 4.1.5.2 and 4.13.5.2). For these reasons, as well as those explained in response to Comments A20-24 and A20-25 below, the CPUC declines to remove Alternative C3 from consideration at this point.

- A20-24 The comment claims that further consideration of Alternative C3 is inconsistent with CEQA Public Resources Code Section 21002 and CEQA Guidelines Section 15126.6(b) that state alternatives should avoid or reduce significant impacts of the project. This is incorrect. Although Alternative C3 would result in certain significant impacts, it would avoid the significant aesthetics impact associated with the proposed Project along Hellman Avenue. Nothing in CEQA prohibits evaluation of an alternative that has greater impacts than the proposed Project, especially where that alternative would reduce one or more of the proposed Project's significant impacts.

- A20-25 As explained in responses to Comment A20-23 and A20-24, the Draft EIR appropriately considered Alternative C3. The Draft EIR will not be revised to remove Alternative C3 from further consideration. At the time of project approval, the CPUC will consider all of the information in the EIR, as well as SCE's comments and other evidence in the record, prior to making a final decision on the project.

- A20-26 SCE's preference for Commission approval of the proposed Project or Alternative D3 is noted and will be shared with the Commission prior to its final consideration of SCE's application.

A20-27 The following sentences have been added to the second paragraph of the Draft EIR Executive Summary as follows to address the need associated with the Mira Loma-Jefferson 66 kV Line portion of the proposed Project.

Therefore, SCE proposes development of a new subtransmission/distribution substation in the City of Corona referred to as Circle City Substation that would address the forecasted electrical maximum operating limit shortfall in the ENA. SCE also proposes new 66 kV line construction and reconfiguration of the existing Mira Loma-Corona-Jefferson 66 kV Line, which would create the Mira Loma-Jefferson and Mira Loma-Corona #2 66 kV lines to address subtransmission capacity issues. The resulting Mira Loma-Jefferson and Mira Loma-Corona #2 lines are collectively referred to as the Mira Loma-Jefferson 66 kV Subtransmission Line. The proposed Project and alternatives are considered in light of this information.

A20-28 The Distribution Service Objective identified in Draft EIR Section ES.2, *Project Objectives*, has been revised as follows to acknowledge that maintaining electrical system reliability is part of the underlying purpose of the proposed Project. The same revision to the Distribution Service Objective has been made to Draft EIR Sections 1.3.2, 3.3.3, and 5.2.

- **Distribution Service Objective** – Maintain electrical system reliability by ensuring ~~Ensure~~ that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.

The CPUC does not consider “increasing operational flexibility” to be part of the underlying purpose of the proposed Project; therefore, those requested edits to the Distribution Service Objective have not been made. For more discussion about the Project objectives, refer to responses to Comments A20-7, A20-11, A20-15 through A20-17, and A20-19.

A20-29 The third sentence in the first paragraph of Draft EIR Section ES.3, *Project Description*, has been revised as follows to clarify that the proposed Circle City Substation 66 kV switchrack would be low profile and the 12 kV switchrack would not be low profile. The sentence has also been revised to clarify that the proposed Mechanical and Electrical Equipment Room may be built from materials other than steel.

It would include a ~~steel~~ low-profile 66 kV steel switchrack, two 28 MVA 66/12 kV transformers, a 12 kV ~~low-profile~~ steel switchrack, two 12 kV 4.8 MVA reactive capacitor banks, a prefabricated ~~steel~~ Mechanical and Electrical Equipment Room, a permanent restroom, and a new road providing access from Leeson Lane.

A20-30 Refer to response to Comment A20-8.

A20-31 The first sentence of the third bullet of air quality Mitigation Measure 4.3-2a in Draft EIR Table ES-1 has been revised as follows to clarify that dust stabilization monitoring would be conducted by a third party hired by SCE, not by the South Coast Air Quality Management District.

Graded and/or excavated inactive areas of the construction site shall be monitored by ~~SCAQMD air district or approved~~ a third party hired by SCE at least weekly for dust stabilization.

A20-32 Mitigation Measure 4.3-2b in Draft EIR Table ES-1 has been revised as follows to allow for flexibility in the event that SCE is not able to identify each piece of equipment 30 days before commencement of construction activities due to unforeseeable construction equipment availability, while retaining the intent of the mitigation measure.

Mitigation Measure 4.3-2b: Construction Equipment Exhaust

Reductions. For all diesel-fueled off-road construction equipment, SCE shall make a good faith effort to use available construction equipment that meets Tier 4, the highest USEPA-certified tiered emission standard. An Exhaust Emissions Control Plan that identifies each off-road unit's certified tier specification and Best Available Control Technology (BACT) shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities. Construction activities cannot commence until the Plan has been approved. For all pieces of equipment that would not meet Tier 4 emission standards, the Exhaust Emissions Control Plan shall include recent documentation from at least two local heavy construction equipment rental companies that indicates that the companies do not have access to higher-tiered equipment for the given class of equipment.

In the event that SCE is not able to identify each piece of equipment 30 days before commencement of construction activities due to unforeseeable construction equipment availability, SCE shall maintain an equipment log that lists the equipment identification number, certified tier and BACT specification, California Air Resources Board (CARB) or South Coast Air Quality Management District (SCAQMD) operating permit specifications, and documents availability of Tier 4 equipment from rental companies, as applicable, for each piece of diesel-fueled off-road construction equipment that is not identified in the Exhaust Emissions Control Plan due to unforeseeable availability issues. The log shall be submitted to the CPUC for review and approval at least 1 week before the commencement of construction activities. Construction shall not commence until SCE confirms that all diesel equipment are included in the Exhaust Emissions Control Plan or until CPUC approves the equipment log. An updated log shall be submitted to the CPUC at least 2 days prior to when any new equipment is brought to or removed from a project work site. New equipment cannot operate at the site until the updated equipment log has been approved by the CPUC.

A20-33 The suggested clarification to Draft EIR biological resources Mitigation Measure 4.4-3b in Table ES-1 has been incorporated. If listed fairy shrimp are present, SCE

shall be required to implement habitat compensation or perform site restoration, but not both actions. This revision is as follows.

Mitigation Measure 4.4-3b: If vernal pool fairy shrimp or Riverside fairy shrimp are identified in the Project area and impacts to occupied pools cannot be avoided, SCE shall mitigate for impacts to vernal pool fairy shrimp habitat and comply with the requirements of the FESA through one or more of the following steps to provide compensatory habitat: (a) participation in the MSHCP to obtain take coverage for identified species, (b) salvage of cysts and creation of replacement pool habitat in the local area at a replacement ratio of at least 3:1, (c) restoration of affected pools onsite after the completion of construction, or (d) acquisition of credits from an approved mitigation bank within the Project region.

If occupied habitat for the above species is encountered at a Project site, to mitigate for temporary or permanent loss of aquatic sites, SCE shall implement the following measures:

Habitat Compensation or Restoration

- SCE shall mitigate for the loss of branchiopod habitat that will be filled or otherwise directly affected by the project by providing compensatory habitat; or,
- SCE shall develop and implement a mitigation, monitoring, and management plan, with input from regulatory agencies that shall outline long-term management strategies and performance standards to be attained to compensate for habitat losses resulting from the project. At a minimum, the plan shall include standards for mitigation site selection and construction specifications for mitigation sites, a description of site conditions including aerial maps, an analysis of local branchiopod habitat, and performance criteria by which site quality can be assessed over time (e.g., size, vegetation species present, date of initial ponding, ponding duration, and wildlife usage). A monitoring program will be established to track the development of habitat conditions that are conducive to the establishment of vernal pool branchiopods.
- To the greatest practicable extent, SCE or its contractors shall construct compensation habitat (i.e., replacement pools) before habitat disturbances are incurred; or directly within the project footprint after construction. A qualified biologist shall ensure that ponds are functioning as designed.

Species Protection During Construction

- SCE shall submit the name and credentials of a biologist qualified to act as construction monitor to USFWS for approval at least 15 days before construction work begins.
- If restoration is proposed to compensate for habitat loss, wWith concurrence from the USFWS, a USFWS-approved biologist shall salvage soils from sites that are known to support vernal pool

branchiopods at least 2 weeks before the onset of construction, or during the preceding dry season if pools are anticipated to hold water when construction begins. The salvaged soil samples will be stored and used to inoculate created pools once minimum performance standards are met at these locations.

- A USFWS-approved biologist shall be present at each active work site within 0.5-mile of potential fairy shrimp habitat until habitat disturbance has been completed. Thereafter, the contractor or SCE shall designate a person to monitor onsite compliance with all minimization measures. A USFWS-approved biologist shall ensure that this individual receives training consistent with USFWS requirements.
- A USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of fairy shrimp and their habitat, the importance of these species and their habitat, the general measures that are being implemented to conserve fairy shrimp as they relate to the project, and the boundaries within which the project construction shall occur.
- All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any fairy shrimp habitat.

A20-34 The suggested clarification to Draft EIR biological resources Mitigation Measure 4.4-9a in Draft EIR Table ES-1 has been incorporated. The revision is as follows.

Mitigation Measure 4.4-9a: Should SCE opt to participate in the MSHCP, apply Restoration Planning Methodology identified in Mitigation Measure 4.4-5c to Non-riparian Special-status Vegetation that is not fully covered in the MSHCP, which includes Riversidean Sage Scrub.

A20-35 The suggested clarification to Mitigation Measure 4.4-12 in Draft EIR Table ES-1 has been made, as follows:

Mitigation Measure 4.4-12: SCE shall ensure that a preconstruction survey for roosting bats shall be conducted by a qualified biologist prior to construction activities to characterize potential bat habitat and identify active roost sites. Surveys shall be conducted within 100 feet of construction activities. If an active bat roost being used for maternity is found within 100 feet of the construction activities, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active maternity roosts by the qualified biologist. Should potential roosting habitat or active non-maternity bat roosts be found in trees to be removed or trimmed or poles to be replaced under the Project, SCE shall implement the following measures:

A20-36 The commenter requests that Draft EIR cultural resources Mitigation Measure 4.5-1 be revised in order to require a Cultural Resources Management Plan (CRMP) that would include cultural resources-related management activities of project construction activities within the Grand Boulevard Historic District. The following

revisions have been made to Mitigation Measure 4.5-1 of the Draft EIR Table ES-1 to clarify that a CRMP would be developed and implemented to manage project-related construction activities within the District. The revisions also reflect other requirements associated with unanticipated discovery of archaeological resources, including human remains (see response to Comment A20-37).

~~**Mitigation Measure 4.5-1: Prior to commencing Project related construction activities associated with the Pedley Source Lines or the Alternative E4 telecommunication line, an architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards for Architectural History shall assist Project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444) located in or adjacent to the Project Area—these contributing elements to the District shall subsequently be avoided during Project implementation.**~~

SCE shall prepare a Cultural Resource Management Plan (CRMP) to guide all cultural resource management activities during project construction. Management of cultural resources shall follow the State standards and guidelines established in Public Resources Code (PRC) Sections 21083.2 and 21084.1 through 21084.3, as well as CEQA Guidelines Section 15064.5 and Appendix G. The CRMP shall be submitted to the CPUC for review and approval at least 30 days prior to the start of construction. The CRMP shall require, but not be limited to, the following:

1. Construction Plan Review/Markup: An architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards for Architectural History shall assist project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444) located in or adjacent to the project construction area.
2. Cultural Resource Monitoring and Field Reporting: Detailed procedures shall be followed for archaeological monitoring and reporting, and for determining when monitoring is no longer necessary. Such procedures shall include, but not necessarily be limited to: archaeological monitoring – the monitor shall meet the Secretary of the Interior's Professional Qualifications for Archeology, mapping of areas to be monitored (i.e., areas of moderate potential for archaeological resources that are in previously undisturbed sediment), and implementation of Unanticipated Discovery Protocol in the event of any identified archaeological deposits, including human remains and potential tribal cultural resources (see below); determining when monitoring is no longer necessary – confirmation that ground-disturbing work is complete in areas of moderate potential for archaeological resources that are in previously undisturbed sediment before the determination is made that monitoring is complete; reporting – submission of an archaeological monitoring report to the CPUC upon completion of construction monitoring and subsequent submission to the California Historical Resources Information System (CHRIS) upon approval by the CPUC.

3. Unanticipated Discovery Protocol: Detailed procedures for halting construction, defining work stoppage zones, notifying stakeholders (e.g. agencies, Native American tribes, utilities), and assessing California Register-eligibility of cultural resources, including human remains and potential tribal cultural resources in the event that any such resources are encountered during construction. Such procedures shall include, but not necessarily be limited to the following:
 - a. If prehistoric or historic-era archaeological resources are encountered during construction, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance.
 - b. The CPUC shall be immediately informed of the discovery.
 - c. A qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology, shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment.
 - d. If human remains are uncovered during construction, SCE and/or its contractors shall immediately halt all work within 100 feet of the discovery, contact the appropriate county coroner to evaluate the remains, and follow the procedures and protocols set forth in CEQA Guidelines Section 15064.5 (e)(1). If the county coroner determines that the remains are Native American, the county coroner shall contact the NAHC within 24 hours, in accordance with California Health and Safety Code Section 7050.5(c), and PRC Section 5097.98 (as amended by Assembly Bill 2641). SCE shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further construction activities until SCE and the CPUC have discussed and conferred, as prescribed in PRC Section 5097.98, with the most likely descendants regarding their recommendations for treatment of the human remains, including, if applicable, taking into account the possibility of multiple human remains.
 - e. If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC § 21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.
4. Treatment Measures: If avoidance of a resource that may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC § 21074), is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American-related), and other

appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). Treatment shall include documentation of the resource and may include data recovery or other measures. Treatment for most resources would consist of (but not necessarily be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the resource. The CRMP shall detail methods for data recovery, including analysis in a regional context, reporting of results within 1 year of completion of field studies, curation of artifacts and data (e.g., maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by the CPUC, and dissemination of reports to appropriate repositories, including the CHRIS.

A20-37 The commenter asks that Draft EIR cultural resources Mitigation Measure 4.5-2 be revised in order to require a Cultural Resources Management Plan (CRMP) that would reduce the risk of construction delays and potential disruptions to the impacted communities, while addressing all aspects of the project's cultural resource requirements associated with unanticipated discovery of archaeological resources, including human remains. Mitigation Measure 4.5-1 has been revised (see response to comment A20-36) to require such a CRMP for the project. Therefore, the Draft EIR cultural resources Impact 4.35-2 discussion has been revised as follows and Mitigation Measure 4.5-2 has been removed.

Such significant impacts would be reduced to a less-than-significant level by implementing Mitigation Measure 4.5-2~~1~~, which would require, in the event of an inadvertent discovery of archaeological resources, a qualified archaeologist to assess any previously undiscovered archaeological resources and, if determined to potentially be an historical resource, avoid the resource if feasible, or, if avoidance is not feasible, consult with Native American tribes (if the resource is Native American-related) and determine treatment measures, which may include conducting data recovery of the resource. The potential impact to previously undiscovered historical resources, and the associated Mitigation Measure 4.5-2~~1~~, applies to all components of the proposed Project.

Mitigation: Implement Mitigation Measure 4.5-1 (see above).

~~**Mitigation Measure 4.5-2:** If prehistoric or historic-era archaeological resources are encountered during Project implementation, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance. The CPUC and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior's Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris;~~

~~culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.~~

~~If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC §21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.~~

~~If avoidance is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). This shall include documentation of the resource and may include data recovery or other measures. Any treatment other than preservation in place must be approved by the CPUC and the appropriate tribe if applicable. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource. The resource and treatment method shall be documented in a professional-level technical report to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of approved treatment and under the direction of the qualified archaeologist.~~

- A20-38 The commenter recommends an addition to the second bullet of Draft EIR cultural resources Mitigation Measure 4.5-4 regarding monitoring of excavations for paleontological resources. No revisions have been made to the Draft EIR in response to this comment. Drilling can bring up salvageable fossils, depending on the diameter of the auger and the types of fossils.
- A20-39 The CPUC does not believe that an air quality specialist would necessarily have the expertise required to prepare the Construction Equipment Efficiency Plan as specified by Draft EIR energy conservation Mitigation Measure 4.6-1. The requested revision has not been incorporated.
- A20-40 As stated in the Draft EIR Impact 4.9-8 discussion on induced currents that could generate electrical shocks (see Section 4.9, *Hazards and Hazardous Materials*), any electrical shocks that would be associated with operation of the Project would be small and would cause no physiological harm; however, they could present nuisance-related impacts. The impact discussion presents an accurate characterization of the type and severity of electrical shocks that could occur during operation of the Project. Nonetheless, Mitigation Measure 4.9-8 in Draft EIR Table ES-1 has been revised as

follows to clarify that its intent is to reduce the potential nuisance associated with people perceiving currents or experiencing small electric shocks. In addition, it is acknowledged that there would be no Project-related electric shock nuisance outside of the existing 500 kilovolt (kV) right-of-way (ROW). Therefore, the following revisions have been made to Mitigation Measure 4.9-8.

Mitigation Measure 4.9-8: As part of the siting and construction process, SCE shall identify objects, such as fences, metal buildings, pipelines, etc. that are within the 500 kV ROW that have the potential for induced voltages to cause a perceptible current or small electrical shock and shall implement electrical grounding of those metallic objects in accordance with Cal/OSHA Electrical Safety Orders at 8 CCR 2739. The identification of objects shall be provided to the CPUC at least 30 days prior to the commencement of construction, and shall document the thresholds of electric field strength and metallic object size at which grounding becomes necessary.

A20-41 As acknowledged in the sixth paragraph of the Draft EIR traffic and transportation Impact 4.17-1 discussion, Traffic Management Plans are prepared as part of the applicable jurisdiction encroachment permit requirements. Therefore, for clarification the first sentence of Mitigation Measure 4.17-1 in Draft EIR Table ES-1 has been revised as shown below:

Mitigation Measure 4.17-1: As part of any encroachment permit, SCE shall prepare and implement a Traffic Management Plan subject to approval of Caltrans and/or the applicable local government(s), including agencies that operate alternative modes of transportation (e.g., North Main Corona Metrolink Station, the Corona Cruiser/RTA bus route, and the Metrolink Rail path).

A20-42 The first sentence of the third paragraph in Draft EIR Section 1.2 has been revised as follows to clarify that the proposed substation switchrack would be built to accommodate two additional 66 kV switchrack positions.

In addition to the switchrack positions necessary for a 56 MVA substation, the site would be built to accommodate with two additional (open)-66 kV switchrack positions that would allow for a potential future 66 kV network growth, and/or substation capacity upgrades to 112 MVA.

A20-43 The referenced values discussed in the first sentence of Draft EIR project description Section 1.2.1.2, *Subtransmission*, are relative to operating limits, which inherently means that the limits are up to the stated values. The suggested revision has not been incorporated because it would add unnecessary redundancy.

A20-44 The CPUC agrees that the second to last sentence in Draft EIR project description Section 1.2.1.2, *Subtransmission*, should be revised to indicate that the existing Mira Loma-Corona-Jefferson 66 kV Line would be reconfigured to become the Mira Loma-Jefferson and Mira Loma-Corona #2 66 kV lines; however, the

sentence should also be revised to indicate that to do so a new 66 kV circuit would need to be installed between Mira Loma and Corona substations. To this effect, the following revisions have been made to the sentence:

To address this subtransmission line capacity issue, SCE proposes to ~~replace~~ reconfigure the existing Mira Loma-Corona-Jefferson 66 kV Line to become ~~with the Mira Loma-Jefferson and Mira Loma-Corona #2 66 kV lines by~~ adding a new 66 kV circuit between Mira Loma and Corona substations.

A20-45 See response to Comment A20-28.

A20-46 The Encroachment Permit row and Jurisdictional/Purpose column under the State heading in Draft EIR Table 1-2 has been revised as follows to accurately reflect the State highways that would be impacted by the Project.

Construction, operation, and maintenance within, under, or over state highway (State Route 448-91 and Interstate 15) ROW

A20-47 As stated in the Draft EIR biological resources Section 4.4.1.8, discussion under the *Regional* heading, the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is used to allow the participating jurisdictions to authorize “take” of plant and wildlife species identified within the plan area. Under the MSHCP, the wildlife agencies (i.e., the USFWS and the CDFW) would grant “Take Authorization” for otherwise lawful actions. SCE is given the option of utilizing the MSHCP as a Participating Special Entity (PSE); however, SCE has not committed to participate in the MSHCP relative to the Project (refer to Applicant Proposed Measures BIO-2 through BIO-8). To clarify that there would be a potential that the MSHCP requirements would apply to the Project, an additional row has been added to Draft EIR introduction Table 1-2 as follows:

<u>Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Certificate of Inclusion</u>	<u>Western Riverside County Regional Conservation Authority</u>	<u>If SCE decides to participate in the MSHCP, it would be required to implement the MSHCP as a Participating Special Entity (PSE)</u>
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A20-48 The following revision has been made as requested to the first sentence of Draft EIR project description Section 2.5.1.2, *66 kV Switchrack*:

The substation would include a ~~steel~~ 66 kV steel switchrack, approximately 5 feet tall, 156 feet long and 120 feet wide.

A20-49 The second to last sentence in Draft EIR project description Section 2.5.2.1 has been revised as follows to clarify the meaning of “underbuild:”

See also **Figure 2-7, *Subtransmission Structures***, which illustrates single-circuit and double-circuit configurations with and without underbuild (i.e. additional wires, cables, and other facilities below the subtransmission

conductor position on the structures) for the different types of poles and other structures proposed for installation.

- A20-50 The second to last sentence in Draft EIR project description Section 2.5.2.3 has been revised as follows to clarify the lines would continue along the south side of Leeson Lane:

The lines would continue northeasterly along the south side of Magnolia Avenue to Leeson Lane, where they would continue northeast along the south side of Leeson Lane, and then turn and travel southeast onto private property to the proposed Circle City Substation site (see Figure 2-20).

- A20-51 The proposed poles to be replaced and the poles to be installed that would be associated with the Mira Loma-Jefferson 66 kV Line in the vicinity of the Santa Ana River crossing, as discussed in the Draft EIR Section 2.5.2.4 text and as illustrated in Figure 2-17, correctly reflect the revised pole information provided by SCE in its response to CPUC Data Request No. 2, Question 2. The correct pole information was considered in the Draft EIR environmental analysis; however, the commenter correctly points out that the call-out text box in the vicinity of the Santa Ana River crossing in Draft EIR Figure 2-6 includes outdated pole information. Therefore, Draft EIR Figure 2-6 has been revised to reflect the correct amount of poles to be removed and installed in the vicinity of Santa Ana River. Refer to the revisions to *Chapter 2, Project Description*, in Final EIR Chapter 4, *Revisions to the Draft EIR*, for the updated Figure 2-6.

- A20-52 Draft EIR project description Table 2-1 note 1 has been revised as follows to acknowledge that exact pole/structure type and quantity are subject to final engineering and other factors. See response to Comment A20-53 for other revisions to the table note.

¹ Specific pole/structure type, quantity, height, and spacing would be determined upon final engineering and other factors, and would be constructed in compliance with CPUC General Order (GO) 95 and SCE standards.

- A20-53 Draft EIR project description Table 2-1 note 1 has been revised as indicated above in response to Comment A20-52 to acknowledge that subtransmission poles/structures would be constructed in compliance with SCE standards.

- A20-54 Draft EIR project description Table 2-1 note 2 has been revised as follows to acknowledge that not all wood poles would be guyed.

² Wood poles ~~would~~could consist of a wood pole with a steel wire known as a "down guy," which attaches to a 1-inch-diameter anchor at ground level located at the back side of the wood pole and a steel span guy that attaches to the top of the wood pole and the subtransmission poles (wood and LWS).

- A20-55 The second paragraph of Draft EIR project description Section 2.5.4.1, *Pedley Source Lines*, has been revised as follows to indicate that existing distribution facilities on the pole to be removed would be transferred to a new distribution

structure (i.e., wood or light-weight steel (LWS) pole), not the new proposed tubular steel pole (TSP).

Location 2: One distribution pole would be removed at the end of Quarry Street, east of the Temescal Wash flood control channel. Existing distribution facilities would be transferred to a new proposed TSP distribution structure (i.e., wood or LWS pole). In addition, an existing underground distribution duct bank would be extended approximately 100 feet to the new TSP distribution structure (i.e., wood or LWS pole).

A20-56 The fourth sentence in the fifth paragraph of Draft EIR project description Section 2.5.5, Telecommunication Facilities, has been revised as shown below to correct a misspelling of “Pedley.”

At Joy Street, the fiber optic cable would convert to overhead at the proposed LWS pole that would be associated with the ~~Paley~~-Pedley Lines.

A20-57 The acronym for “right-of-way” is defined in Draft EIR project description Section 2.5.3, *Distribution Getaway Duct Bank Systems*, which precedes the use of the acronym in Section 2.6.1. There is no need to define it again in Chapter 2. The suggested revision has not been incorporated.

A20-58 The last sentence in Draft EIR project description Section 2.6.3, *Vegetation Clearance*, has been revised as shown below to clarify that any mulched debris would be spread on site.

Debris would be mulched and spread on site or it would be removed to a permitted disposal location.

A20-59 The following revisions have been added to Draft EIR project description Section 2.6.4.1, Grading and Drainage, to include description of the on-site swales.

The substation pad would be graded to maintain a minimum of 1-percent slope to drain toward the north. Surface runoff at the site would drain to the north on surface swales through both the eastern and western site corridors, discharging at Leeson Lane. If required by the City of Corona, an approximately 700-foot extension of the existing storm drain system may be constructed to accept site flow onto Leeson Lane.

A20-60 The fifteenth row in Draft EIR project description Table 2-4, *Estimated Temporary and Permanent Land Disturbances*, under the Mira Loma-Jefferson 66 kV Subtransmission Line heading has been revised as follows to clarify the units of the 420 value.

Install new underground duct bank (6, 7, 16)	420 <u>linear feet</u>	Linear feet by 15 feet wide	0.1	0.1	0.0
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A20-61 The second sentence in Draft EIR project description Section 2.6.6.3, *Conductor Stringing*, has been supplemented as shown below to identify additional safety devices SCE indicates would be used during conductor stringing.

To ensure the safety of workers and the public, safety devices such as traveling grounds, electrical-shock prevention mat, guard structures, radio-equipped public safety roving vehicles, and linemen would be in place prior to the initiation of wire stringing activities.

A20-62 The second sentence in “Step 5” in Draft EIR project description Section 2.6.6.3, *Wire Stringing*, has been deleted as shown below to clarify that the proposed subtransmission line conductors would not be bundled.

- **Step 5 – Clipping-In:** After the conductor is dead-ended, the conductors would be secured to all tangent structures using a process called “clipping in.” ~~Once this is complete, spacers would be attached between the bundled conductors of each phase to keep uniform separation between each conductor.~~

A20-63 The second sentence in Draft EIR project description Section 2.6.6.4, *Guard Structures*, has been supplemented as follows to acknowledge that the California Department of Transportation may be the State agency that would require netting over State roadways.

Temporary netting could be required to be installed by the California Highway Patrol, California Department of Transportation, or other jurisdictional agency to protect under-built infrastructure such as highway, railroad, and open channel water crossings.

A20-64 The first sentence in Draft EIR project description Section 2.6.6.4 has been revised as follows to accurately reflect the total length of new underground 66 kV line that would be associated with the proposed Project.

The Project includes a total of approximately ~~4,980~~ 4,910 feet of new underground 66 kV subtransmission lines and associated transition and support structures.

A20-65 The instance of “California Occupation and Safety Health Administration” in Draft EIR project description Section 2.6.7.2, *Trenching*, is the only reference to the agency in Chapter 2, *Project Description*; therefore, there is no need to include the acronym here. The suggested revision has not been incorporated.

A20-66 The third sentence in Draft EIR project description Section 2.6.7.4, *Duct Bank Installation*, has been revised as follows to accurately reflect the duct bank components.

Duct banks would consist of six ~~or eight~~ 6-5-inch-diameter polyvinyl chloride (PVC) conduits fully encased with a minimum of 3 inches of concrete all around.

- A20-67 The third sentence in Draft EIR project description Section 2.6.7.5, *Vault Installation*, has been revised as follows to accurately reflect SCE's standards for subtransmission line vault spacing.

The vaults would be placed approximately ~~300 to 800~~ 50 to 1,500 feet apart along the underground portion of the subtransmission lines.

- A20-68 The third sentence in Draft EIR project description Section 2.6.8, *Energizing 66 kV Subtransmission Lines*, has been revised as follows to acknowledge that de-energizing and re-energizing the existing subtransmission lines may not occur at night.

To reduce the need for electric service interruption, de-energizing and re-energizing the existing subtransmission lines would occur ~~at night~~ when electrical demand is low or otherwise in accordance with California Independent System Operator's requirements.

- A20-69 The first sentence in the second paragraph of Draft EIR project description Section 2.6.9, *Telecommunications Construction*, has been revised as follows to reference the correct section for conductor stringing.

Overhead fiber optic cable would be installed on overhead structures, as described in Section ~~2.6.6.3-2.6.5.3~~, Conductor Stringing.

- A20-70 The last sentence in the third paragraph of Draft EIR project description Section 2.6.9 has been supplemented as shown below to clarify that the manholes or pull boxes themselves would not be backfilled.

The manhole or pull box would be lowered into place, connected to the conduits, and the area surrounding the manhole or pull box would be backfilled with concrete slurry.

- A20-71 The second paragraph in Draft EIR project description Section 2.6.15, *Construction Schedule*, has been revised as follows to clarify that per General Order 131-D, SCE would not be required to obtain discretionary approvals, such as variances, from local jurisdictions for work that would be required to be conducted outside allowed hours and days as specified by ordinance.

Construction activities would adhere to the allowable construction work hours specified in the noise ordinances of local jurisdictions, ~~including as allowed by variance if necessary~~ with the possible exception of some construction activities. ~~Work may be necessary outside generally allowed periods,~~ for

example, to deliver the transformer, fill substation transformers, or to effect or respond to outages (planned or unplanned) during nighttime hours.

In the event construction activities are necessary on days or hours outside of what is specified by ordinance (for example, if existing electricity lines must be taken out of service for the work to be performed safely and the line outage must be taken at night for system reliability reasons, or if construction needs require continuous work), SCE would provide 5-day advanced notification, including a general description of the work to be performed, location, and hours of construction anticipated, to the CPUC, any applicable/impacted local jurisdiction, and residents within 300 feet of the anticipated work, as well as route all after-hours construction traffic away from residences, schools, and recreational facilities to the maximum extent feasible. These requirements may be waived in the event that emergency and/or potentially unsafe work conditions would be created by limiting construction activities to those hours specified by ordinance. SCE would report any such events to the CPUC within 5 business days.

- A20-72 A new sentence has been added after the first sentence in the sixth paragraph of Draft EIR project description Section 2.7, *Operation and Maintenance*, as shown below to clarify that SCE may need to develop new access in some cases to maintain poles.

Maintenance of some pole locations and associated lay down areas could result in ground and/or vegetation disturbance, though attempts would be made to utilize previously disturbed areas to the greatest extent possible. In some cases, new access may be created to remove and replace an existing pole.

- A20-73 The last sentence of the *Subtransmission* bullet in Draft EIR project description Section 2.9, *Land Rights*, has been revised as follows to clarify that the private properties would require new or amended land rights.

SCE would install the proposed subtransmission facilities within existing SCE fee-owned ROW, easements, and public ROW where SCE is in franchise; however, approximately 110 private properties would require new or ~~upgraded~~ amended land rights and agency permits (87 private property and 23 agency) based on final engineering.

- A20-74 The last sentence in Draft EIR project description Section 2.9 has been revised as follows to clarify that upgraded easements may include amending existing land rights.

Upgrading easements may include amending existing ~~adding~~ land rights, by adding width to existing easements; and improving or clarifying access or maintenance rights.

A20-75 See response to comment A20-28.

A20-76 The first sentence in the third to last paragraph in Draft EIR project alternatives Section 3.2.2, *Consistency with Project Purpose and Objectives*, has been revised as shown below to clarify that maintaining electric reliability is part of the Project objectives.

In order to assess the ability of alternatives to maintain electric reliability by meeting forecasted electrical demand and maintaining sufficient voltage, the following factors were considered:

A20-77 The first sentence in the second paragraph of Draft EIR project alternatives Section 3.2.4, *Potential to Eliminate Significant Environmental Effects*, has been revised as follows to accurately reflect the significant and unavoidable environmental impacts of the Project.

The Project would result in significant and unavoidable environmental effects on aesthetics, air quality, ~~hazards~~, and noise.

A20-78 The last bullet under Hazards and Hazardous Materials in Draft EIR project alternatives Table 3-2, *Summary of Less than Significant with Mitigation (Class II) Environmental Impacts of the Project*, has been revised as follows to clarify that the subject impact is associated with the potential for nuisance associated with people perceiving currents or experiencing small electric shocks.

- Induced currents associated with operation of the Project could generate perceptible currents or small electrical shocks.

A20-79 The first column of the Alternative E3 row in Draft EIR project alternatives Table 3-3, *Summary of Alternatives Screening Analysis*, has been revised as follows to correctly indicate that the alternative also includes the Pedley Source Lines and the Mira Loma-Jefferson subtransmission line.

Alternative E3: *Southern 66 kV Source Lines Alignment*. This alternative would replace the Databank Source Lines. Alternative E3 also includes construction of Circle City Substation, ~~Databank~~ Pedley Source Lines, and the Mira Loma-Jefferson subtransmission line (and/or associated alternatives).

A20-80 The first column of the Alternative E4 row in Draft EIR project alternatives Table 3-3 has been revised as follows to correctly indicate that the alternative also includes the Mira Loma-Jefferson subtransmission line.

Alternative E4: *Databank 66 kV Source Lines Only*. This alternative would eliminate the Pedley Source Lines component of the Project. Alternative E4 also includes construction of Circle City Substation, Circle City to Corona fiber line, and the Mira Loma-Jefferson subtransmission line (and/or associated alternatives).

A20-81 To clarify, the intent of the last box under Substation Source Lines in Draft EIR project alternatives Table 3-1, *Project Alternatives Options*, is to indicate that for

the Databank Source Lines, either Alternative E3 (the Southern 66 kV Source Lines alignment) can be selected, Alternative E4 (Databank 66 kV Source Lines Only) can be selected, or both alternatives could be selected that would result in the Databank 66 kV Source Lines being constructed in the Southern 66 kV Source Lines alignment with the Pedley Source Lines not being constructed. The suggested revisions have not been incorporated.

- A20-82 The second sentence of the fourth paragraph in Draft EIR project alternatives Section 3.4.1, *Alternative A: No Project*, has been revised as follows to correctly reference the Mira Loma System.

Operating procedures to relieve base case thermal overloads of the subtransmission system forecasted as early as 2018 would include transferring load between the substations via distribution circuits, load dropping on one or more distribution circuits, or disconnecting entire substations from the Mira Loma Vista-System.

- A20-83 Draft EIR project alternatives Figure 3-2b has been updated to identify the existing and new fiber alignments that would be used/constructed under Alternative C3 to connect the 40 MW battery storage facility to SCE's telecommunications system consistent with Attachment 2 of SCE's comment letter. Refer to the revisions to *Chapter 3, Project Alternatives*, in Final EIR Chapter 4, *Revisions to the Draft EIR*, for the updated Figure 3-2b.

- A20-84 It is correct that the 50 MW and 40 MW battery storage facilities under Alternative C3 would be integrated onto the electrical grid by connecting to existing 66 kV lines and not directly to the substations they would be connected to; however, the 42 MW battery storage facility would be connected directly to Jefferson Substation. Therefore, the requested revisions would be inaccurate. Since the referenced Draft EIR language is accurate and subsequent discussions of the 50 MW, 42 MW, and 40 MW facilities provide more detailed information about how the facilities are connected to the substations, the requested revisions have not been incorporated.

- A20-85 The *50 MW Connected to Corona Substation* discussion in Draft EIR project alternatives Section 3.4.3.3, *Alternative C3: 66 kV Subtransmission-Level Battery Storage*, has been supplemented with an additional third paragraph as shown below to include information about the telecommunication lines SCE states would be required to connect the 50 MW facility to SCE's existing telecommunications system.

In addition, two telecommunications lines would be required to connect the facility to SCE's existing telecommunications system. One telecommunications line would exit the battery storage substation site in an underground configuration for approximately 100 feet to the north side of West 6th Street. The telecommunication line would rise to an overhead position and follow

the same alignment as the new double-circuit 66 kV subtransmission line to S. Lincoln Avenue where it would tap into the existing Mira Loma-Corona Fiber Optic Cable. The second telecommunications line would exit the battery storage facility and be installed approximately 1,100 feet of new underground conduit and cable along the north side of W. 6th Street to an existing pole on South Sherman Street, where it would rise and tap into the existing Corona-Pedley Fiber Optic Cable.

Construction and operation of the telecommunication lines to connect the 50 MW facility to SCE's existing telecommunications system would not result in additional significant environmental impacts associated with Alternative C3 beyond those discussed in Draft EIR Chapter 4, *Environmental Analysis*. As discussed in Chapter 4, *Revisions to the Draft EIR*, of this Final EIR, Alternative C3 is already ranked last among the proposed Project and Subtransmission Service Objective alternatives relative to its environmental impacts. As a result of Comments A20-85 through A20-87, the telecommunication lines have been considered and Alternative C3 continues to rank last among the proposed Project and Subtransmission Service Objective alternatives. The Draft EIR Alternative C3 environmental impact analyses have been revised as follows to include consideration of the telecommunication lines.

The following sentence was added to the end of the first paragraph of the Alternative C3 aesthetics impact analysis discussion in Draft EIR Section 4.1.5.2, *Subtransmission Service Objectives Alternatives*, to include consideration of the telecommunication lines.

Visual impacts associated with the Alternative C3 telecommunication lines would result in similar or reduced impacts as discussed above for the 66 kV connection lines because the lines would be installed on the new 66 kV connection line poles, in new underground alignments, and on existing poles.

There would be no agricultural and forestry resources impacts associated with the Alternative C3 telecommunication lines. No revisions to Draft EIR Section 4.2, *Agricultural and Forestry Resources*, are necessary.

With regard to air quality, it is assumed that the Alternative C3 telecommunication lines would not be constructed on the peak day of construction activity; therefore, there are no changes to the peak day emissions presented in air quality Draft EIR Table 4.3-9, *Alternative C3 Peak Daily Construction Emissions*. However, the following sentences in the seventh paragraph of the Alternative C3 air quality impact analysis discussion in Draft EIR Section 4.3.5.2, *Subtransmission Service Objectives Alternatives*, have been revised to include consideration of the telecommunication lines:

Construction along new subtransmission line and telecommunication line alignments would proceed at a linear pace and would not be expected to

expose any one receptor along the corridors for longer than 2 to 3 weeks. The total emissions and duration of exposure at any one sensitive receptor location for the subtransmission line or telecommunication line construction would be relatively minor compared to the exposure periods used in health risk assessments.

The following sentence in the seventh paragraph of the Alternative C3 biological resources impact analysis discussion in Draft EIR Section 4.4.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

Alternative C3 includes three proposed subtransmission-level battery storage and substation locations, new subtransmission lines, telecommunication lines, and line reconductoring that was not included in the Project analysis.

The second paragraph of the Alternative C3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

Archival review indicates that no previously documented architectural resources are located within or adjacent to the footprint of the Alternative C3 sites. Due to the developed and urban nature of the Alternative C3 surroundings, the addition of the proposed substations, ~~and~~ subtransmission lines, and telecommunication lines would not result in any direct or indirect impacts to architectural resources. The telecommunication lines for the Alternative C3 40 MW facility would ~~does not~~ include ~~any~~ construction, operation, or maintenance-related activities in ~~or in the immediate vicinity of~~ the Grand Boulevard Historic District (P-33-006444); ~~and however~~, since Alternative C3 may include construction of the proposed Pedley Source Lines, it could result in the same impact to the Grand Boulevard Historic District (P-33-006444), an historical resource, as the proposed Project (Impact 4.5-1; Class II).

The first sentence of the Alternative C3 energy conservation impact analysis discussion in Draft EIR Section 4.6.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

Under Alternative C3, up to three subtransmission-level (66 kV) battery storage and substation facilities, associated subtransmission and telecommunication lines, and upgrades to existing Jefferson Substation, would be constructed and operated instead of the Mira Loma-Jefferson 66 kV line component of the Project.

The second paragraph of the Alternative C3 geology and soils impact analysis discussion in Draft EIR Section 4.7.6.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

Although the subtransmission line that would be required for the 42 MW battery storage facility and substation would traverse within 0.6 mile of the Elsinore Fault Zone, Glen Ivy Section, no faults zoned under the Alquist-Priolo Earthquake Fault Zoning Act, or any other Holocene-active faults would be traversed by this alternative. In addition, existing subtransmission line and telecommunication line poles would be replaced with new poles built according to modern, up-to-date building codes. For these reasons, the ground shaking risk to people or structures associated with this alternative would be less than significant (4.7-1; Class III). The battery storage and substation facilities would be constructed in areas of very low liquefaction hazard, and the 40 MW facility would be constructed near the proposed Circle City Substation, an area with low liquefaction potential due to deep groundwater and dense soils. This alternative would require a smaller number of poles compared to the project, but like the proposed Project would result in construction of the subtransmission line and telecommunication line connections in areas mapped as being susceptible to liquefaction, resulting in new seismic hazard risks. Implementation of Mitigation Measure 4.7-2 would reduce this impact to less than significant by ensuring that appropriate engineering recommendations are implemented to reduce the risk of substantial adverse liquefaction effects (Impact 4.7-2; Class II).

The first paragraph of the Alternative C3 greenhouse gas emissions impact analysis discussion in Draft EIR Section 4.8.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

Under Alternative C3, up to three subtransmission-level (66 kV) battery storage and substation facilities, associated subtransmission lines and telecommunication lines, and upgrades to existing Jefferson Substation, would be constructed and operated instead of the Mira Loma-Jefferson 66 kV line component of the Project.

The third paragraph of the Alternative C3 greenhouse gas emissions impact analysis discussion in Draft EIR Section 4.8.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

Using these assumptions, and the assumption that construction of the telecommunication lines would result in about half of the emissions as construction of the 66 kV connection lines, it is estimated that the total

annual amortized emissions under Alternative C3, would be approximately ~~296~~ 292-metric tons CO₂e per year (see Appendix D for calculations), which would be approximately two and a half times more emissions than generated under the proposed Project, but still substantially less than the significance threshold of 10,000 metric tons.

The fifth and sixth paragraphs of the Alternative C3 hazards and hazardous materials impact analysis discussion in Draft EIR Section 4.9.5.2, *Subtransmission Service Objectives Alternatives*, have been revised as follows to include consideration of the telecommunication lines.

The Alternative C3 subtransmission line connection and telecommunication line alignments are not within the boundaries of the Riverside County Airport Land Use Commission's Airport Land Use Compatibility Plans for Chino Airport or Corona Municipal Airport, and the poles and conductor would be outside of the 100-to-1 surface ratio relative to the airports runways. Unlike the proposed Mira Loma-Jefferson subtransmission line, there would be no aviation safety impact under this alternative.

Temporary lane closures during construction activities associated with the subtransmission line connection and telecommunication line alignments along West 6th Street, Ontario Avenue, S. Lincoln Avenue, W. Grand Boulevard, 10th Street, and Magnolia Avenue, etc., could affect emergency vehicle access to and through construction areas. Given the reduced mileage of subtransmission line under this alternative compared to the proposed Mira Loma-Jefferson subtransmission line, this impact would be the reduced compared to the Project. Implementation of Mitigation Measure 4.17-1 would ensure that potential impacts associated with temporary effects on emergency service provider access would be mitigated to less-than-significant levels (Impact 4.9-5; Class II).

The fourth sentence of the last paragraph of the Alternative C3 hydrology and water quality impact analysis discussion in Draft EIR Section 4.10.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

This alternative would result in fewer workers being exposed to flooding because the Mira Loma-Jefferson subtransmission line would not be constructed; however, workers along the subtransmission line and telecommunication line alignments for the 40 MW battery storage and substation facility in the vicinity of the Temescal Wash would be exposed to flooding and mudflow in the event that a dam on Lake Mathews fails.

There would be no land use and planning impacts associated with the Alternative C3 telecommunication lines. No revisions to Draft EIR Section 4.11, *Land Use and Planning*, are necessary.

No revisions to Draft EIR Section 4.12, *Mineral Resources*, are necessary for the consideration of the telecommunication lines.

The first paragraph of the Alternative C3 noise impact analysis discussion in Draft EIR Section 4.13.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

Under Alternative C3, up to three subtransmission-level (66 kV) battery storage and substation facilities, associated subtransmission and telecommunication lines, and upgrades to existing Jefferson Substation, would be constructed and operated instead of the Mira Loma-Jefferson 66 kV line component of the Project. With the exception of the 40 MW subtransmission-level battery storage and substation site off Leeson Lane near the proposed Circle City Substation site, which is approximately 800 feet from the closest residences, each of the other two subtransmission-level battery storage and substation sites and associated subtransmission and telecommunication line alignments are in the immediate vicinity (i.e., within 50 feet) of receptors that are sensitive to noise. All components associated with Alternative C3 would be within the City of Corona.

The third paragraph of the Alternative C3 noise impact analysis discussion in Draft EIR Section 4.13.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

It is assumed that construction activities associated with the battery storage and substation facilities would be similar to those that would be associated with Circle City Substation and that construction activities associated with the subtransmission and telecommunication line connections would be similar to those that would be associated with the proposed source lines and Mira Loma-Jefferson subtransmission line. Therefore, the construction noise levels would be similar.

No revisions to Draft EIR Section 4.14, *Population and Housing*, are necessary for the consideration of the telecommunication lines.

There would be no impacts to public services associated with the Alternative C3 telecommunication lines. No revisions to Draft EIR Section 4.15, *Public Services*, are necessary.

The Alternative C3 recreation impact analysis discussion in Draft EIR Section 4.16.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

~~The Alternative C3 battery storage and substation sites and 66 kV subtransmission line alignments are not in the immediate vicinity of parks or other recreational facilities. Therefore, Alternative C3 would have no effect~~

~~on existing recreational facilities. Alternative C3 would avoid the less than significant construction related impacts at the City of Eastvale's American Heroes Park because the Mira Loma Jefferson 66 kV subtransmission line would not be constructed under this alternative. Similar to the temporary construction-related impacts to American Heroes Park that would occur associated with the proposed Mira Loma-Jefferson subtransmission line (see *Construction* discussion for the Project in Impact 4.16-1), the Alternative C3 telecommunication alignments for the 42 MW and 40 MW facilities would be located adjacent to Lincoln Park along S. Lincoln Avenue, and City Park along Quarry Street, respectively, which may result in temporary lane closures and park access restrictions, which would be a less-than-significant impact (Impact 4.16-1; Class III). As under the Project, Alternative C3 would not include recreational facilities or require the construction or expansion of such facilities that could result in adverse physical effects on the environment; therefore, no impact would occur (No Impact).~~

The first sentence of the Alternative C3 transportation and traffic impact analysis discussion in Draft EIR Section 4.17.5.2, *Subtransmission Service Objectives Alternatives*, has been revised as follows to include consideration of the telecommunication lines.

Under Alternative C3, up to three subtransmission-level (66 kV) battery storage and substation facilities, associated subtransmission and telecommunication lines, and upgrades to existing Jefferson Substation, would be constructed and operated instead of the Mira Loma-Jefferson 66 kV line component of the Project.

No revisions to Draft EIR Section 4.18, *Utilities and Service Systems*, are necessary for the consideration of the telecommunication lines.

A20-86 The *42 MW Facility Connected to Jefferson Substation* discussion in Draft EIR project alternatives Section 3.4.3.3 has been supplemented with an additional paragraph as shown below to include information about the telecommunication lines SCE states would be required to connect the 42 MW facility to SCE's existing telecommunications system.

In addition, two telecommunications lines would be required to connect the 42 MW facility to SCE's existing telecommunications system. One telecommunications line would exit the battery storage substation site in an underground configuration for approximately 150 feet to the west side of the drainage canal that borders the east side of the site. The telecommunication line would rise to an overhead position and follow the same alignment as the double-circuit 66 kV subtransmission line to a pole just north of Jefferson Substation. The telecommunications line would then convert to an underground configuration and continue into Jefferson Substation in

approximately 520 feet of new underground conduit to the existing Mechanical and Electrical Equipment Room (MEER) building. The second telecommunications line would exit the battery storage facility in an underground configuration for approximately 150 feet to the west side of the drainage canal that borders the east side of the site. The telecommunications line would rise to an overhead position and continue north along existing poles for approximately 1,700 feet to the south side of Tenth Street, where it would convert to an underground position. The telecommunications line would continue easterly approximately 1,500 feet in new underground conduit to an existing pole on S. Lincoln Avenue and would rise to an overhead position. The telecommunications line would then continue south along the existing pole line for approximately 5,700 feet to the northeast corner of W. Ontario Avenue and S. Lincoln Avenue where it would convert to an underground position and continue into Jefferson Substation in approximately 260 feet of new underground conduit to the existing MEER.

Construction and operation of the telecommunication lines to connect the 42 MW facility to SCE's existing telecommunications system would not result in significant environmental impacts associated with Alternative C3 beyond those discussed in Draft EIR Chapter 4, *Environmental Analysis*. For the revisions to the Draft EIR Alternative C3 environmental impact analyses to include consideration of the telecommunication lines, refer to response to Comment A20-85.

A20-87 The *40 MW Facility Connected to Chase Substation* discussion in Draft EIR project alternatives Section 3.4.3.3 has been supplemented with an additional paragraph as shown below to include information about the telecommunication lines SCE states would be required to connect the 40 MW facility to SCE's existing telecommunications system.

In addition, two telecommunications lines would be required to connect the 40 MW facility to SCE's existing telecommunications system. One telecommunications line would be along Magnolia Avenue and would tap the battery storage facility to the existing Corona-Jefferson fiber line. The proposed 5,500-foot telecommunications line (referred to here as the Battery Storage Tap to Corona-Jefferson fiber route) would consist of approximately 2,500 feet of new underground conduit and approximately 3,000 feet in existing underground conduit. The second telecommunications line would be 18,000 feet long and would consist of approximately 5,200 feet of new underground conduit, approximately 5,000 feet of new fiber placed in existing underground conduit, and approximately 7,800 feet of the line would be attached to existing distribution poles. Refer to Figure 3-2b, for an illustration of the alternative fiber alignment and where it would be installed in underground conduit and where it would be installed overhead on existing distribution poles. The new conduit would exit the 40 MW facility on Leeson Lane, turn north on Magnolia Avenue, and then west on East 6th Street to a

location west of El Camino Avenue and the railroad. There would also be short segments of conduit installed along East 3rd Street, South Belle Street, and North Sheridan Street. The majority of the new conduit would be installed using a backhoe (SCE, 2018i); however, directional boring would be used for the telecommunication fiber to cross under the existing Burlington Northern Santa Fe (BNSF) railroad tracks that run north/south, approximately 50 feet east of El Camino Avenue. The directional boring would take place approximately 40 feet east of El Camino Avenue in an east/west direction. The bore (tunnel) would be approximately 80 feet in length, 12 inches in diameter, and 3 feet deep. Entrance and exit pits would be approximately 4 feet wide, 8 feet long, and 4 feet deep. The duration of boring activities to cross under the railroad tracks would take approximately 2 days. Site preparation and restoration for the bore pits on 6th Street would include saw-cutting the required area and removing asphalt, excavating the necessary depth for boring, backfilling, and repaving the street to City of Corona standards (SCE, 2018j). The overhead segments of the telecommunication line would be installed on 39 existing wood distribution poles primarily along East 3rd Street, Quarry Street, and West 2nd.

Construction and operation of the telecommunication lines to connect the 40 MW facility to SCE's existing telecommunications system would not result in significant environmental impacts associated with Alternative C3 beyond those already discussed in Draft EIR Chapter 4, *Environmental Analysis*. For the revisions to the Draft EIR Alternative C3 environmental impact analyses to include consideration of the telecommunication lines, refer to response to Comment A20-85.

- A20-88 The third sentence in the *40 MW Facility Connected to Chase Substation* discussion in Draft EIR project alternatives Section 3.4.3.3 has been revised as follows to show the correct spelling of Leeson Lane.

It would be accessed by a 26-foot-wide driveway from ~~Lesson~~ Leeson Lane that would enter the site from the northeast.

- A20-89 The third sentence in Draft EIR project alternatives Section 3.4.4.1, *Alternative D1: 12 kV Distribution-Level Battery Storage*, has been revised to clarify that the total energy capacity would be approximately 24 MWh, as opposed to the each of the facilities having a capacity of 24 MWh. There is no need to add "through 2027" to the sentence since the Distribution Service Objective is by definition applicable through the 2027 (see *Clarifications to the Draft EIR* for information regarding the latest (i.e., 2018 through 2017) peak energy load forecast and associated revisions to the Project objectives.

Based on analysis conducted by SCE, a 10 MW battery storage facility (referred to as Option 2A by SCE), comprised of two 5 MW installations (with a corresponding total energy capacity of approximately 24 megawatt

hours (MWh)) that would be connected to two existing distribution circuits near the site, would be sufficient to satisfy the Project's Distribution Service Objective.

A20-90 The following footnote has been added to the end of the first paragraph in Draft EIR project alternatives Section 3.4.4.1, *Alternative D1: 12 kV Distribution-Level Battery Storage* to clarify that phase 1 of the Alternative D1 battery storage facility would be scheduled to commence operation by 2021.

³ Installation of phase 1 for operation by 2021 would allow SCE to operate the battery storage installation for several years in advance of the projected capacity shortfall in 2024. This would provide SCE the opportunity to gain operational experience with the battery installation and to evaluate its performance under a variety of system conditions prior to the anticipated capacity shortfall addressed by the batteries.

A20-91 Draft EIR Figure 3-3 has been updated to identify the second telecommunications route, with existing and new fiber alignments, that would be used/constructed under Alternative D1 consistent with Attachment 2 to the SCE's comment letter. Refer to the revisions to *Chapter 3, Project Alternatives*, in Final EIR Chapter 4, *Revisions to the Draft EIR*, for the updated Figure 3-3.

A20-92 The Draft EIR description of telecommunications facilities that would be associated with Alternative D1 are based on SCE's response to CPUC Data Request 5, Question 4 provided on November 30th, 2017, and briefing materials provided to CPUC Energy Division staff on December 20th, 2017, which indicate SCE would require installation of one fiber optic line associated with Alternative D1 and for that line SCE recommended the use of the proposed 5,500-foot Source Line route from the proposed Circle City Substation site to tap into the existing Corona-Jefferson Fiber Optic Line near the intersection of Magnolia Avenue and Rimpau Avenue.

To be consistent with SCE's new description of the required telecommunication facilities for Alternative D1, the first paragraph of the *Telecommunication Connection* discussion in Draft EIR project alternatives Section 3.4.4.1 has been revised as shown below. Revisions to the Draft EIR Alternative D1 environmental impact analyses are also identified below to include consideration of the new telecommunication line. Construction and operation of the new telecommunication line to connect the Alternative D1 battery storage facility to SCE's existing telecommunications system would not trigger significant environmental impacts.

Alternative D1 would require installation of ~~a two~~ two new telecommunications lines to connect the battery storage facilities to SCE's existing telecommunications system. The first new telecommunications line would be along Magnolia Avenue and would tap the battery storage facility to the existing Corona-Jefferson fiber line. The proposed 5,500-foot telecommunications line (referred to here as the Battery Storage Tap to Corona-Jefferson fiber route) would consist of approximately 2,500 feet of

new underground conduit and approximately 3,000 feet in existing underground conduit. The second telecommunications line would be 18,000 feet long and would consist of approximately 5,200 feet of new underground conduit, approximately 5,000 feet of new fiber placed in existing underground conduit, and approximately 7,800 feet of the line would be attached to existing distribution poles. This second line would be the same as the Circle City Substation to Corona Substation telecommunications line described for Alternative E4. See Section 3.4.5.4, *Alternative E4: Databank 66 kV Source Lines Only*, for a detailed description of this line. Refer to Figure 3-3 for an illustration of Alternative D1's Battery Storage Tap to Corona-Jefferson and Battery Storage Tap to Corona Substation fiber routes. The figure also shows where the new underground conduit installations would be required and where the line would be installed within existing underground conduit.

Construction and operation of the second telecommunication line to connect the Alternative D1 battery storage facility to SCE's existing telecommunications system would not trigger significant environmental impacts, and the environmentally superior alternative identified in Draft EIR Chapter 5, *Comparison of Alternatives*, remains unchanged. Below are revisions to Draft EIR aesthetic resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, and transportation and traffic relative to the second telecommunication line to connect the Alternative D1 battery storage facility to SCE's existing telecommunications system. No changes were necessary for the other Draft EIR environmental issue areas.

The last two sentences in the last paragraph of the *Alternative D1: 12 kV Distribution-Level Battery Storage* discussion in Draft EIR aesthetics Section 4.1.5.3, *Distribution Service Objectives Alternatives*, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Alternative D1's Battery Storage Tap to Corona-Jefferson telecommunication line would be installed completely underground, resulting in no long-term visual impacts (No Impact). Alternative D1's Battery Storage Tap to Corona Substation telecommunication line would be constructed mostly underground, but approximately 7,800 feet of the line would be aboveground, attached to existing distribution poles. The overhead line attached to existing distribution poles would result in a less-than-significant impact (Impact 4.1-3; Class III). Significant and unavoidable visual impacts related to the proposed Mira Loma-Jefferson subtransmission line or the facilities under Alternative C3 could still occur under this scenario, depending on the combination of alternatives selected.

The seventh sentence in the *Alternative D1: 12 kV Distribution-Level Battery Storage* discussion in Draft EIR biological resources Section 4.4.5.3, *Distribution Service Objectives Alternatives*, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

The construction of distribution connections on Leeson Lane and the telecommunication connections along Magnolia Avenue, 2nd Street, 6th Street, etc., would occur within urban alignments where protected trees, nesting birds, or roosting bats may be encountered.

For revisions to the cultural resources impact analysis to reflect the second telecommunications lines required for Alternative D1, refer to response to Comment A20-116.

The first and third sentences in the *Alternative D1: 12 kV Distribution-Level Battery Storage* discussion in Draft EIR geology and soils Section 4.7.5.3, *Distribution Service Objectives Alternatives*, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Alternative D1 would construct a battery storage facility, distribution connections, and a two telecommunication connections instead of the proposed Circle City Substation and associated source lines components of the Project. The battery storage facility would be constructed immediately adjacent to the proposed Circle City Substation site. The new telecommunication line connections similarly would be installed along the same alignment as the proposed Databank Source Lines and the same alignment as the proposed Circle City Substation site to the existing Corona Substation described for Alternative E4.

The first and second sentences in the *Alternative D1: 12 kV Distribution-Level Battery Storage* discussion in Draft EIR hydrology and water quality Section 4.10.5.3, *Distribution Service Objectives Alternatives*, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Alternative D1 would result in the construction of a battery storage facility, distribution connections, and a two telecommunication connections instead of the proposed Circle City Substation and associated source lines components of the Project. The battery storage facility would be constructed immediately adjacent to the proposed Circle City Substation site and the telecommunications lines would be constructed ~~on~~ along the same alignments as the proposed Databank Source Lines and the proposed Circle City Substation site to the existing Corona Substation telecommunication line described for Alternative E4.

The first sentence of the third paragraph in the *Alternative D1: 12 kV Distribution-Level Battery Storage* discussion in Draft EIR hazards and hazardous materials Section 4.9.5.3, *Distribution Service Objectives Alternatives*, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Temporary lane closures along Magnolia Avenue, Railroad Street, Grand Avenue, Quarry Street, 6th Street, and other streets during construction activities associated with the distribution and/or telecommunications connections could affect emergency vehicle access to and through construction areas.

The first sentence in the *Alternative D1: 12 kV Distribution-Level Battery Storage* discussion in Draft EIR minerals resources Section 4.12.5.3, *Distribution Service Objectives Alternatives*, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Alternative D1 would result in the construction of a battery storage facility, distribution connections, and ~~a~~ telecommunication connections instead of the proposed Circle City Substation and associated source lines components of the Project.

The third sentence in the *Alternative D1: 12 kV Distribution-Level Battery Storage* discussion in Draft EIR transportation and traffic Section 4.17.5.3, *Distribution Service Objectives Alternatives*, has been revised as follows to reflect the telecommunications lines required for Alternative D1.

Although, some limited construction in Leeson Lane would be required to connect distribution circuits, and construction would be required in or along Magnolia Avenue, Railroad Street, Grand Avenue, Quarry Street, 6th Street, and other streets to connect the telecommunication lines, the overall construction-related impacts would be reduced compared to the proposed Project, and impacts would be less than significant with implementation of Mitigation Measure 4.17-1 (Impacts 4.17-1, 4.17-6, and 4.17-7; Class II).

- A20-93 The first sentence in the third paragraph of the *Telecommunication Connection* discussion in Draft EIR project alternatives Section 3.4.5.4 has been revised as follows to show the correct spelling of Leeson Lane.

The new conduit would exit the substation on ~~Lesson~~ Leeson Lane, turn north on Magnolia Avenue, and then west on East 6th Street to a location west of El Camino Avenue and the railroad.

- A20-94 Draft EIR Figure 3-2b has been revised to reflect SCE's revised description of the required telecommunication facilities for Alternative D1. Refer to the revisions to *Chapter 3, Project Alternatives*, in Final EIR Chapter 4, *Revisions to the Draft EIR*, for revised Figure 3-2b.

A20-95 As shown on the California Department of Transportation Scenic Highway map for Riverside County (identified as Draft EIR reference Caltrans, 2016a), the portion of Interstate 15 (I-15) located south of State Route 91 is an Eligible State Scenic Highway. Therefore, the requested change to the Draft EIR would not be accurate and has not been made.

A20-96 As shown on the California Department of Transportation Scenic Highway map for Riverside County (identified as Draft EIR reference Caltrans, 2016a), it is confirmed that the portion of State Route 91 located west of I-15 is an Eligible State Scenic Highway. Draft EIR Table 4.1-1, second row, second column has been revised as follows to correct this error.

Portion ~~west-east~~ of I-15 is an Eligible State Scenic Highway within San Bernardino and Riverside counties.

A20-97 The second to last sentence of the first paragraph in the *Circle City Substation (Photographs 1 through 6)* discussion in Draft EIR aesthetics Section 4.1.1.2, *Existing Visual Quality of the Region*, has been revised as follows to correctly refer to the line as a distribution line.

An open field with stockpiled soil and oak trees can be seen in the middleground along with an existing ~~distribution-subtransmission~~ line.

A20-98 The fifth sentence of the third paragraph of Draft EIR air quality Section 4.3.1.5, *Sensitive Receptors*, has been revised as follows to show the unit of measure for the number 500.

With regard to Alternative C3 (Subtransmission-Level Battery Storage), the 50 MW subtransmission-level battery storage facility would be located approximately 270 feet east-northeast of the Christian Heritage School and approximately 50 feet south of residences along Pleasant View Avenue; the 42 MW subtransmission-level battery storage facility would be located approximately 500 feet southwest of the closest building associated with Corona High School and approximately 50 feet north, east, and west of residence along Fairmont Drive, Border Avenue, and Zircon Street, respectively.

A20-99 Since Alternative E4 would result in construction of only the Databank Source Lines and not the Pedley Source Lines to connect to Circle City Substation, and the sensitive receptors along the Databank Source Lines alignment are disclosed in the *Proposed Project* discussion of Draft EIR air quality Section 4.3.1.5, *Sensitive Receptors*, a specific reference to Alternative E4 is not required in the *Alternative Source Lines* discussion of that section.

A20-100 The first sentence of the third paragraph in the Draft EIR air quality Impact 4.3-1 discussion has been revised as follows to reference the correct impact number.

As described under Impacts 4.3-2, ~~4.6-3, 4.6-4,~~ and 4.3-6, the Project would result in significant impacts associated with construction emissions of criteria pollutants.

A20-101 See response to Comment A20-31.

A20-102 The sixth bullet in air quality Mitigation Measure 4.3-2a, *Fugitive Dust Controls*, has been revised as follows to allow for an effective option to reduce fugitive dust emissions associated with loose-material hauling for trucks that are not designed to be tarped.

- All trucks hauling dirt, sand, or other loose materials are to be tarped with a fabric cover, with the exception of trucks that are not designed to be tarped, such as belly dumps, and maintain a freeboard height of at least 12 inches. Water shall be applied to the truck loads hauling dirt, sand, or other loose materials that are not designed to be tarped prior to leaving the site;

A20-103 See response to Comment A20-32.

A20-104 The Threshold Exceeded row of the VOC column in Draft EIR air quality Table 4.3-10, *Alternative D1 Peak Construction Emissions*, has been changed from “Yes” to “No” to accurately reflect the impact determination relative to volatile organic compounds.

A20-105 The following revisions have been made to the Impact 4.8-1 discussion in Draft EIR Section 4.8, *Greenhouse Gas Emissions*, to reflect SCE’s revised construction water use estimate.

The first sentence of the second paragraph has been revised as follows:

The short-term construction emissions estimates provided by SCE do not include indirect emissions estimates associated with the proposed use of ~~58~~ 107 acre-feet of water for dust suppression, cleanup, crew member consumption, and hand washing (~~SCE, 2015, p. 4.17-10~~).

The last paragraph and Table 4.8-2 of the *Construction Emissions* discussion has been revised as follows:

Table 4.8-2, *Project Construction GHG Emissions*, presents the total estimated GHG construction emissions that would be associated with the Project generated by off-road construction equipment, on-road vehicles, and water use. Approximately ~~2,711~~ 2,759 metric tons of CO₂e would be generated during the Project’s 18-month construction phase.

**TABLE 4.8-2
 PROJECT CONSTRUCTION GHG EMISSIONS**

Emissions Source	CO₂e metric tons
Off-road Construction Equipment	1,522
On-road Vehicles	1,132
Water Use Indirect Emissions	57 <u>105</u>
Total	2,711<u>2,759</u>

SOURCE: SCE, 2015; 2016; see Appendix D for all emissions estimates.

The Draft EIR GHG *Construction Emissions* discussion and Table 4.8-3 have been revised as follows. These revisions do not change the less-than-significant GHG impact determination identified in the Draft EIR.

Total Amortized Annual Emissions

As indicated in Table 4.8-2, *Project Construction GHG Emissions*, total GHG construction emissions would be approximately ~~2,711~~2,759 metric tons CO₂e. These emissions amortized over a 30-year period equal approximately ~~90~~92 metric tons per year. As presented in **Table 4.8-3**, *Project Amortized Annual Emissions*, adding ~~90~~92 metric tons of CO₂e to the operational emissions of 26 metric tons CO₂e per year equals a total Project GHG emissions rate of approximately ~~116~~118 metric tons CO₂e per year, which would be substantially less than the significance threshold of 10,000 metric tons CO₂e per year.

**TABLE 4.8-3
 PROJECT AMORTIZED ANNUAL EMISSIONS**

Emissions Source	CO₂e metric tons/year
Construction emissions: total amortized (30 year period)	90 <u>92</u>
Maintenance and operations	2
SF ₆ Circuit Breaker Emissions	24
Total	116<u>118</u>
Significance threshold	10,000
Significant impact?	No

SOURCE: SCE, 2015; 2016; see Appendix D for all emissions estimates.

A20-106 The second sentence of the Freshwater Marsh discussion in Draft EIR biological resources Section 4.4.1.2, *Natural Communities and Wildlife Habitat*, has been revised as follows to correctly state the associated alternative name.

Two patches of freshwater marsh occur within the study area—one along the proposed Mira Loma-Jefferson subtransmission line routes in the Prado Flood Control Basin and one along the Alternative E3~~alternative source~~ line corridors around the quarry lake.

A20-107 The first sentence of the second paragraph in Draft EIR biological resources Section 4.4.1.7, *Wildlife Movement*, has been revised as shown below to use the correct alternative names.

Portions of the proposed Circle City Substation site, ~~the Substation Site Alternative D2~~, and ~~the Source Route Alternative E3~~ occur within the MSHCP Proposed Constrained Linkage 4.

A20-108 The suggested revision to Mitigation Measure 4.4-3b has been incorporated, as summarized in the response to Comment A20-33.

A20-109 The suggested clarification to the fifth paragraph of Draft EIR biological resources Impact 4.4-5 has been made, as follows:

The Project area overlaps designated critical habitat for the least Bell's vireo and proposed critical habitat for western yellow-billed cuckoo in both Riverside County and San Bernardino County. Construction in San Bernardino County would occur within developed roadways along Hellman Avenue and not within suitable habitat for least Bell's vireo or western yellow-billed cuckoo. Impacts to critical habitat within San Bernardino County are unlikely since the Project alignments avoid riparian vegetation, and poles and other structures are placed within developed areas. However, if placement of structures causes the loss or modification of habitat with critical habitat features, coordination with the USFWS may be required. Construction that is either adjacent to or in critical habitat in the Prado Flood Control Basin in Riverside County would consist of new LWS poles, hybrid H-frames, and conductor pulling sites. Construction and removal of these structures would occur within the Santa Ana River corridor, in suitable habitat for least Bell's vireo and western yellow-billed cuckoo.

A20-110 The suggested revision to Draft EIR biological resources Mitigation Measure 4.4-9a has been incorporated, as summarized in the response to Comment A20-34.

A20-111 The suggested revision to Draft EIR biological resources Mitigation Measure 4.4-12 has been incorporated, as summarized in the response to Comment A20-35.

A20-112 See response to Comment A20-36.

A20-113 See response to Comment A20-37.

A20-114 See response to Comment A20-37.

A20-115 This comment is a duplicate of Comment A20-38. Please refer to Response A20-38 for a response to this comment.

- A20-116 The commenter asks that the second paragraph under the cultural resources impact discussion for Alternative D1 be revised to include analysis of the second telecommunications route that SCE now states would be required for Alternative D1 (see Comment A20-92). The following revisions have been made to the second paragraph under the Draft EIR cultural resources impact discussion for Alternative D1.

In contrast to the proposed Project, Alternative D1 would not impact the Grand Boulevard Historic District (P-33-006444), an historical resource. Alternative D1 does not include any construction, operation, or maintenance-related activities in or in the immediate vicinity of the District. Therefore, under Alternative D1, Impact 4.5-1 would be less than significant, and no mitigation would be required. Alternative D1 has the potential to impact the Grand Boulevard Historic District (P-33-006444), an historical resource, as defined in CEQA Guidelines Section 15064.5. This potential impact would result from the Alternative D1 telecommunications line, which would include the addition of overhead telecommunication lines on 39 existing wood distribution poles primarily along East 3rd Street, Quarry Street, West 2nd Street, and W Grand Boulevard. The telecommunications line would not result in the addition of a new visual change to the historic setting of the District; therefore, no resulting indirect visual impacts to the District would occur. However, the majority of the underground construction component of the telecommunications line would involve installation within an existing underground duct bank system in Grand Boulevard and West 3rd Street, including 1,300 feet of new underground duct bank required within the District. This underground component of the Alternative D1 telecommunications line would result in similar potential impacts to sidewalks, curbs and gutters, and historic period landscaping and trees associated with the District as those for the proposed Project. These potential impacts could still result in a substantial adverse change to the significance of the District, a significant impact that would be reduced to a less-than significant level through implementation of Mitigation Measure 4.5-1 (Impact 4.5-1; Class II).

- A20-117 As shown in Draft EIR Project Description Table 2-4, *Estimated Temporary and Permanent Land Disturbance*, construction of the proposed Pedley and Databank Source Lines alone, which would not be required under Alternative D1, would result in a total approximately area of disturbance of 111 acres. The same table shows that 1,200 feet of underground telecommunications conduit installation would result in 0.7 acres of disturbance. Assuming Alternative D1 would result in a total of 7,300 feet of underground telecommunications conduit installation, the associated ground disturbance would be approximately 6 acres. Even without consideration of the disturbance that would be associated with the proposed substation versus the battery storage facility under Alternative D1, which would be considerably higher associated with the proposed substation, the comparison of the

ground disturbance associated with construction of the proposed sources lines (i.e., 111 acres) compared to that of the underground telecommunications conduit that would be constructed under Alternative D1 is enough evidence to substantiate that Alternative D1 would require substantially less ground disturbance than the proposed Project. The suggested revision has not been incorporated.

A20-118 See response to Comment A20-39.

A20-119 The comment requests that additional information from the geotechnical report be added to the Draft EIR text. The following sentence in the second paragraph of Draft EIR geology and soils Section 4.7.1.1, *Regional Geology*, has been revised as follows to clarify the nature of geologic conditions at the Circle City Substation site.

The Circle City Substation site is underlain by a thin mantle of un-compacted fill overlying young alluvial channel deposits of the Temescal Wash, which range from fine grained mixtures of silt, sand, and some gravel, to coarse granular alluvium containing sand, gravel, cobbles and boulders mixtures (TDBU, 2012).

A20-120 The commenter suggests additions to clarify the Draft EIR text. The following sentence in the last paragraph in Draft EIR geology and soils Section 4.7.1.1 has been revised as follows to clarify what is shown in Figure 4.7-1.

Figure 4.7-1 provides an illustration of the major mapped earthquake faults in the area of the proposed Project.

A20-121 The commenter suggests additions to clarify the Draft EIR. The title of Draft EIR Figure 4.7-1 has been revised to “Earthquake Faults and Hazard Zones in the Project Vicinity” in response to this comment. The revisions to this figure do not result in any changes to the environmental analysis included in the Draft EIR.

A20-122 The commenter suggests revisions to clarify the Draft EIR text regarding existing soils conditions. The first sentence in Draft EIR Section 4.7.1.3, *Soils*, has been revised in response to this comment.

Soils overlie ~~Overlying~~ the geologic units described in Section 4.7.1.1, Regional Geology, within the Project area ~~above is a layer of soil~~.

A20-123 The commenter suggests revisions to clarify the contents of Temescal Wash deposits in the Draft EIR text. In response to this comment, the fourth paragraph in Draft EIR geology and soils Section 4.7.1.3, *Soils*, has been revised to read:

Detailed soil information was collected at the Circle City Substation site during a geotechnical investigation conducted for the Project. It was determined that the Circle City Substation site is in an area underlain by a thin mantle of un-compacted fill overlying young alluvial channel deposits of

the Temescal Wash, which range from fine grained mixtures of silt, sand, and some gravel, to coarse granular alluvium containing sand, gravel, cobbles and boulders mixtures. Uncompacted fill was encountered to a depth of about 2 feet, under which lay approximately 4 feet of generally fine grained, silt, sand, and gravel mixtures. Coarsely granular alluvium consisting of sand, gravel, cobble, and boulder mixtures to a depth of 28 feet were encountered below the top 6 feet (TDBU, 2012).

A20-124 The commenter suggests revisions to the Draft EIR text regarding expansive soils at the Circle City Substation site. In response to this comment, the second sentence in the last paragraph of Draft EIR geology and soils Section 4.7.1.3 has been revised as follows.

Testing indicated the site soils have very low expansion potential, and therefore no measures to treat expansive soils ~~geotechnical recommendations~~ were identified ~~made~~ (TDBU, 2012).

A20-125 The commenter suggests revisions to the Draft EIR text regarding existing landslide hazard in the Project area. Text describing the existing landslide hazard in the last sentence of Draft EIR geology and soils Section 4.7.1.4, *Geologic Hazards*, has been revised as follows:

Also, the site topography is relatively level and the absence of nearby slopes precludes any slope stability hazards; the potential for seismically-induced landslides at any of the Project subtransmission alignments ~~or sites~~ is considered low. In addition, the potential for seismically-induced landslides within the Circle City Substation site is also considered low (TBDU Geotechnical Engineering Group, 2012).

A20-126 The first sentence in Draft EIR Section 4.17.1.1, *Regional Roadways*, has been revised as shown below to reference State Route 71, not State Route 74.

Riverside County is linked to Los Angeles and Orange counties primarily by State Route 60 (SR 60), Interstate 10 (I-10), SR 91, and SR ~~74~~71.

A20-127 See response to Comment A20-41.

A20-128 The last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative B in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, since small electric shocks are associated with voltage, a 500 kV transmission line would have a much higher electric field than a 66 kV line, and for a 66 kV line outside of a 500 kV right-of-way the electric field at the ground level is not high enough to create nuisance shock, the sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be

applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative and would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-129 The last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative C1 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative and would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-130 The second to last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative C2 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the last sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-131 The second to last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative C3 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the last sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be applicable

to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-132 The second to last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative D1 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the last sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative due to the reduced amount of overhead lines that would be installed compared to the proposed Project. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-133 The last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative D2 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

Potential impacts related to perceptible currents or small electric shocks would be the same as the Project with implementation of Mitigation Measure 4.9-8 (Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-134 The last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative E1 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal

structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, although there would be no potential impacts related to perceptible currents or small electric shocks associated with the underground segment, the overall impact associated with the overhead segments of the source lines and the Mira Loma-Jefferson subtransmission line would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-135 The last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative E2 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, although there would be no potential impacts related to perceptible currents or small electric shocks associated with the underground segment, the overall impact associated with the overhead segments of the source lines and the Mira Loma-Jefferson subtransmission line would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-136 The second to last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative E3 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the last sentence has also been revised to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, the potential for impacts related to perceptible currents or small electric shocks associated with Alternative E3 would be increased compared to the Project given the longer length of overhead line compared to the proposed Databank Source Lines. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-137 The second to last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative E4 in Section 4.9.5, *Alternatives*, has been revised to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks. In addition, the last sentence has also been revised to acknowledge that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

A20-138 As stated in the Draft EIR hazards and hazardous materials Impact 4.9-8 discussion on induced currents that could generate electrical shocks (see Section 4.9, *Hazards and Hazardous Materials*), any electrical shocks that would be associated with operation of the Project would be small and would cause no physiological harm. The impact discussion presents an accurate characterization of the type and severity of electrical shocks that could occur during operation of the Project. The recommended revision has not been incorporated.

A20-139 See response to Comment A20-40.

A20-140 Electric and magnetic fields (EMF) tend to raise high public concern relative to electric transmission projects, such as the proposed Project. The intent of Draft EIR hazards and hazardous materials Section 4.9.1.5, *Electric and Magnetic Fields*, is to provide the public with information relative to the investigations and studies that have been conducted by CPUC relative to potential health effects associated with EMF, and to describe the CPUC's position on evaluating health effects of EMF when there are currently no specific numerical standards available to evaluate such impacts. The discussion is for informational purposes only, and the suggested deletion has not been incorporated.

A20-141 The first sentence under the *Linear Facilities* heading in the Draft EIR hydrology and water quality Impact 4.10-3 discussion has been revised as follows to reflect the correct amount of light-weight steel (LWS) poles that would be located in the Santa Ana River corridor. This revision does not change the impact determination.

Construction of the proposed linear Project facilities, such as the source lines, Mira Loma-Jefferson subtransmission line, and distribution getaways, would temporarily alter drainage patterns across the construction areas, including activity in the Santa Ana River corridor during construction and installation of two H-frames and ~~one~~ eleven light-weight steel (LWS) poles.

A20-142 The *Summary of Sensitive Receptors - Subtransmission Line Alignment Alternatives* discussion in Draft EIR noise Section 4.13.1.3, *Sensitive Receptors*, has been revised as follows to show the correct names for the Mira Loma-Jefferson subtransmission line and Alternative C3.

Alternative C1 (Underground Hellman Avenue) would expose the same sensitive receptors as the Project along the proposed Mira_Loma_Jefferson subtransmission line alignment. Alternative C2 (Archibald Avenue) would occur adjacent to residential receptors along Archibald Avenue between Belgrave Avenue and the Santa Ana River. The route would occur in a southeasterly direction along the Mira Loma-Jefferson subtransmission line alignment exposing the same receptors as described for the Project. With regard to Alternative ~~C2~~ C3 (Subtransmission-Level Battery Storage), the 50 MW subtransmission-level battery storage facility would be located approximately 270 feet east-northeast of the Christian Heritage School and approximately 50 feet south of residences along Pleasant View Avenue;

A20-143 Since Alternative E4 would result in only the Databank Source Lines and not the Pedley Source Lines to connect to Circle City Substation, and the sensitive receptors along the Databank Source Lines alignment are disclosed in the *Summary of Sensitive Receptors - Proposed Project* discussion of Draft EIR Section 4.13.1.3, *Sensitive Receptors*, the sensitive receptors associated with all the project alternatives are identified and a specific reference to Alternative E4 is not required in that discussion.

A20-144 The commenter states that a reasonable assumption is that construction noise levels associated with implementation of Draft EIR noise Mitigation Measures 4.13-2a and 4.13-2b would be reduced by 5 dBA due to the use of a noise barrier. However, Mitigation Measure 4.13-2a only requires noise control barriers for stationary equipment, and would have little to no effect in reducing noise levels from mobile sources, such as the backhoes, dozers, and loaders that would be required to construct the Project. In addition, there are several other components of Mitigation Measures 4.13-2a and 4.13-2b that could reduce construction-related noise at sensitive receptor locations, but not enough information is currently known to quantify their effectiveness in reducing noise levels. For example, it is not clear how much practical maximum physical separation could be maintained between the activities and sensitive receptors, or if “quit” stationary construction equipment would be available.

The CPUC maintains that it is not possible to firmly substantiate that implementation of Mitigation Measures 4.13-2a and 4.13-2b would achieve the noise level reductions needed to mitigate the impact to a less-than-significant level. The recommended revision has not been incorporated.

A20-145 Draft EIR Mitigation Measure 4.13-1 has been revised as follows to allow for site grading associated with Alternative C3 before installation of the permanent block

wall at the sites, while reducing grading-related noise levels through installation of a temporary construction noise barrier. The revision to the measure has no effect relative to the with-mitigation significance; i.e., less than significant for operations, and significant and unavoidable for construction.

Mitigation Measure 4.13-1: Should Alternative C3 be selected as part of the approved project, ~~prior to commencement of construction activities~~, an 8-foot-high block wall shall be installed along the perimeter of the 50 MW and 42 MW subtransmission-level battery storage and substation sites immediately following the conclusion of grading activities at the sites. Until the permanent walls are constructed, temporary construction noise barriers that feature a solid panel and a weather-protected, sound-absorptive material on the construction activity side of the barrier shall be installed that shall block the line of sight between near-by sensitive receptors and the construction sites. The temporary construction noise barriers and permanent walls shall attenuate construction and operational noise levels. SCE shall retain an acoustical engineer to perform noise measures in the vicinity of the residences to verify that the 50 MW and 42 MW subtransmission-level battery storage and substation operational noise levels comply with the City's nighttime exterior noise level limit of 50 dBA. Documentation of compliance shall be submitted to the CPUC no later than 60 days after the start of operations. In the event the facility noise levels violate the standards, additional noise control techniques shall be initiated to correct the violation.

A20-146 Draft EIR noise Mitigation Measure 4.13-2c has been revised as follows to allow for site grading associated with Alternative D2 before installation of the permanent block wall at the site, while reducing grading-related noise levels through installation of a temporary construction noise barrier. The revision to the measure has no effect relative to the with-mitigation significance; i.e., less than significant for operations, and significant and unavoidable for construction.

Mitigation Measure 4.13-2c: Should Alternative D2 be selected as part of the approved project, the 8-foot-high block wall that is part of the alternative shall be installed along the perimeter of the substation site ~~prior to the commencement of substation construction activities~~ immediately following the conclusion of grading activities at the site. Until the permanent wall is constructed, a temporary construction noise barrier that feature a solid panel and a weather-protected, sound-absorptive material on the construction activity side of the barrier shall be installed that shall block the line of sight between near-by sensitive receptors and the construction site shall be installed.

A20-147 The eighth row of the first column in Chapter 5 Table 5-2 under *Section 4.9, Hazards and Hazardous Materials*, has been revised as follows to clarify that the nuisance induced current impact would be associated with perceiving currents or small electric shocks.

Impact 4.9-8: Induced currents associated with operation of the Project could generate <u>perceivable currents or small</u> electrical shocks.
--

A20-148 See response to Comment A20-28.

A20-149 SCE recommends changing the costs for Alternatives C1 and D1 identified in Draft EIR comparison of alternatives Table 5-3 from \$100 to \$120 million to \$120 to \$150 million. The cost amounts presented in Draft EIR Table 5-3 are based on the direct costs with contingencies from SCE's response to CPUC Data Request 16, Question 10 (Attachment 1 of 1) with battery revenue amounts identified in SCE's response to CPUC Data Request 16, Question 12 (Attachment 2 of 2), subtracted from the total amounts, plus an addition of \$1.7 million to represent the undergrounding that would be associated with Alternative C1. The comment includes no discussion of how the costs were quantified and it is not clear if or how energy revenues that would result from the battery storage facility are handled in the cost estimates.

In addition, it appears that the total cost for the proposed Project identified in CPUC Data Request 16, Question 10 (Attachment 1 of 1) does not include the cost that would be associated with construction of the Pedley Sources Lines (referred to as Corona-Circle under the Subtransmission heading). Due to the uncertainty of the costs associated with the proposed Project versus the cost associated with the environmentally superior alternative, the suggested change has not been incorporated; however, issues associated with cost may be addressed by the Commission during the Formal Proceeding process for Application A.15-12-007.

The Draft EIR analyzes and compares the environmental impacts of the various alternatives and the proposed Project. The Commission will consider the conclusions in the EIR, along with other evidence in the record, prior to making a final decision on SCE's application.

References

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- Corona Historic Preservation Society (CHPS), 2018. Electronic mail communication between Corona Historic Preservation Society and Environmental Science Associates, June 18, 2018.
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- Southern California Edison (SCE), 2018a. Response to CPUC Data Request 18, Question 7. Provided to CPUC August 28, 2018.
- SCE, 2018b. Southern California Edison Response to California Public Utilities Commission (CPUC) Data Request No. 18, Question 8 for the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, August 2018.
- SCE, 2018c. Southern California Edison Response to California Public Utilities Commission (CPUC) Data Request No. 18, Question 9 for the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, August 2018.
- SCE, 2018d. Southern California Edison Response to California Public Utilities Commission (CPUC) Data Request No. 18, Question 1 for the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, March 2018.
- SCE, 2018e. Southern California Edison Response to California Public Utilities Commission (CPUC) Data Request No. 18, Question 2 for the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, March 2018.
- SCE, 2018f. Southern California Edison CONFIDENTIAL Response to California Public Utilities Commission (CPUC) Data Request No. 18, Question 3 for the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, November 2018.

3.3 Individuals Comments and Responses

This section includes the letters received from individuals, with individual comments delineated as indicated above, followed by responses to each comment.

Matthew Fagundes

From: Baxter Miller [REDACTED]
Sent: Monday, June 18, 2018 1:52 PM
To: CircleCityEIR
Subject: Circle City substation EIR

I own the building on the South West Corner of Joy Street and Blaine Street. I would like to know how this proposal will impact my business and property.
Please send me a digital copy of the technical reports and mitigation recommendations so that I can go over them and prepare myself for the public meeting on June 27th.

| B1-1
| B1-2

Thank you in advance.

I can be reached via the contact information below.

Baxter Miller, RLA, ASLA
President
bmla
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310 North Joy Street
Corona, Ca 92879



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3.3.1 Letter B1 – Responses to Comments from Baxter Miller

- B1-1 The commenter’s concerns about the economic effects of the Project are outside the scope of CEQA. (CEQA Guidelines §§ 15064, 15131 (“Economic or social effects of a project shall not be treated as significant effects on the environment.... The focus of the analysis shall be on the physical changes.”) Refer to Draft EIR Chapter 4, *Environmental Analysis*, for discussion of the environmental impacts that would be associated with the proposed Project, and for discussion of potential Project effects associated with economic impacts, including loss of property value, refer to Master Response 2: Non-CEQA Issues.
- B1-2 The commenter requested that a digital copy of technical reports and mitigation recommendations be provided in order to prepare for the public meeting on June 27, 2018. The Draft EIR and technical appendices were made available online through out the Draft EIR comment period. On June 20, 2018, Environmental Science Associates sent the commenter an electronic mail with a link to CPUC’s webpage for the Project where the Environmental Impact Report, which includes the technical environmental analyses and the recommended mitigation requirements for the Project and alternatives, are available for download.

June 27, 2018

To Whom it may concern,

Although I am unable to attend the Circle City Substation & Mira Loma-Jefferson Subtransmission Line Project planning meeting, I am writing this letter to express my feelings regarding the project. I am strongly against Edison's proposed expansion project on Hellman Avenue, as presented in the photos. Not only are the additional lines an eyesore, but could have longterm health effects as well. However, I understand Edison's need to expand in order to keep up with demand & therefore support the alternative below ground option. Thank you for your time & consideration.

B2-1

B2-2

B2-3

B2-4

Sincerely,

Kristina Quin

14971 Oakvale Cir.
Eastvale, CA 92880

3.3.2 Letter B2 – Responses to Comments from Kristina Jovin

- B2-1 The commenter’s opposition to the proposed Project along Hellman Avenue is acknowledged. The commenters concerns are not related to environmental issues and are outside the scope of the EIR; therefore, no further response is required.
- B2-2 The commenter states that the additional lines associated with the Project would be an eyesore. For discussion of the visual analysis conducted for the Project, refer to Draft EIR aesthetics Section 4.1, *Aesthetics*.
- B2-3 Potential health and safety impacts of the proposed Project are discussed in Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- B2-4 The commenter expresses support for the alternative underground option. It is assumed the commenter is referring to Alternative C1, which is a 0.4-mile underground segment along Hellman Avenue for the Mira Loma-Jefferson subtransmission line. Comment noted.

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

SCH No.3016021012

Attn: Robert Peterson

Dear Mr. Peterson

I reside at 2282 Santa Anita Rd, Norco. My property is adjacent to River Road and is portioned by a deeded utility right of way the full width on the River Road side.

When we moved here 30 years ago, sheep were yearly driven down River Road for weed control grazing. We were surrounded on 3 sides by cattle farming.

Selection of this location was driven by job related access to Ontario Airport.

That being said, my participation in communications and specifically Amateur Radio Emergency Disaster operations has been an endeavor since 1954.

B3-1

Much to my dismay I found that the noise interference emanating from back yard transmission lines was not only radio but included television. My family could not watch television at various times due to the spark noise, at times audible in the yard.

B3-2

Quality of Life.

The present wooden poles are causing issues with property values. Sale of a home is negatively impacted by two elements. The Public perception of health impacts attributed to EMF exposure. Number 2 is the physical poles location and cabling, resulting in comments from prospective buyers of not wanting this in their yard.

B3-3

The wooden poles were accepted then, now they represent a major failure of SCE to provide it's residential customers with infrastructure that is appropriate for half million dollar homes on that of right of way property. 100 foot steel towers in place of underground transmission fails to bring our residential area any benefit.

B3-4

Richard Monroe



3.3.3 Letter B3 – Responses to Comments from Richard Monroe

- B3-1 The comment consists of introductory sentences that describe the location of the commenter’s property and his participation in Amateur Radio Emergency Disaster operations. Comment noted.
- B3-2 The commenter discusses how “spark noise” associated with the nearby existing transmission lines interfere with his family’s use of the radio and television. It is not clear if the commenter is referring to the actual corona discharge noise at the conductor, or referring to electrical interference that can be caused by corona or gap discharges.

With regard to impacts associated with corona discharge noise at the conductor, which is the breakdown of air into charged particles caused by the electric field at the surface of a conductor, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1.

There are two potential sources for interference: corona and gap discharges. As described above, corona discharges can sometimes generate unwanted electrical signals. Corona-generated electrical noise decreases with distance from a transmission line and also decreases with higher frequencies (when it is a problem, it is usually for lower frequencies, such as AM radio and not the higher frequencies, such as those associated with TV signals). Corona interference to radio and television reception is usually not a design problem for subtransmission lines rated at 66 kV. The resulting signal-to-noise ratio will meet the reception guidelines of the Federal Communications Commission.

Gap discharges are different from corona. Gap discharges can develop on power lines at any voltage. They can take place at tiny electrical separations (gaps) that can develop between mechanically connected metal parts. A small electric spark discharges across the gap and can create unwanted electrical noise. The severity of gap discharge interference depends on the strength and quality of the transmitted radio or TV signal, the quality of the radio or TV set and antenna system, and the distance between the receiver and power line. (The large majority of interference complaints are found to be attributable to sources other than power lines: poor signal quality, poor antenna, door bells, and appliances such as heating pads, sewing machines, freezers, ignition systems, aquarium thermostats, fluorescent lights, etc.).

Gap discharges can occur on broken or poorly fitting line hardware, such as insulators, clamps, or brackets. In addition, tiny electrical arcs can develop on the surface of dirty or contaminated insulators, but this interference source is less than gap discharge. Hardware is designed to be problem-free, but corrosion, wind motion, vandalism damage, and insufficient maintenance contribute to gap formation. Generally, interference due to gap discharges is less frequent for high-voltage transmission and subtransmission lines than lower-voltage lines. The reasons that subtransmission lines

have fewer problems include: predominate use of steel structures, fewer structures, greater mechanical load on hardware, and different design and maintenance standards. Gap discharge interference can be avoided or minimized by proper design of the subtransmission line hardware parts, use of electrical bonding where necessary, and by careful tightening of fastenings during construction. Individual sources of gap discharge noise can be readily located and corrected. Arcing on contaminated insulators can be prevented by increasing the insulation in high contamination areas and with periodic washing of insulator strings. If existing gap discharge interference is caused by these conditions, the gap discharge interference should be reduced with the installation of the new subtransmission line and hardware and the undergrounding of the existing 33 kV distribution line.

- B3-3 For discussion of potential Project effects associated with economic impacts, including loss of property value, and how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- B3-4 The commenter states 100-foot steel towers instead of underground transmission provides no benefit to the residential area. This comment is acknowledged; however, to clarify, the light-weight steel (LST) poles that would be installed in the area of the commenter's residence would be 60 to 85 feet tall.

Public Comment Card

Submitted 6/28/18
Eastvale Comm Ctr



SCE's Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project
Comment Period: June 4, 2018 – July 20, 2018

Committer Name/Affiliation: Dickie Simmons

Address: 7091 Ginko Ct Eastvale

Comment: WE purchased our dream home

with all utility wires underground

Now SCE wants to put lines above

our homes marring our landscaping

views and

with the wild fires this past

year

B4-1

B4-2

3.3.4 Letter B4 – Responses to Comments from Dickie Simmons

- B4-1 This comment is noted. Because the comment is not related to environmental issues, no further response is required under CEQA. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B4-2 This comment is noted. Because the comment is not related to environmental issues, no further response is required under CEQA. For discussion of wildfire impacts that would be associated with the Project, refer to the Impact 4.9-6 and 4.9-7 discussions in Draft EIR Section 4.9, *Hazards and Hazardous Materials*.

Matthew Fagundes

From: Kai Liu [REDACTED]
Sent: Friday, June 29, 2018 4:14 PM
To: CircleCityEIR
Subject: For the power poles

Dear city manager,

My name is Kai and I have been living in 7447 SILVER SADDLE CT, EASTVALE CA 92880 with my wife and 2 daughters since 2014. [REDACTED] B5-1

We are 100% understand the importance of adding the extra electric wire, and my whole family will agree with this project if **the wire goes underground**. Eastvale is a very nice and new city, and we need to protect everything of the city. We have big concerns with the overhead electric wire. Why don't we just put the wire underground? We pay more than 10,000 dollars a year for the property tax to the city so that we have the responsibility to take care the environment of the city. It will have security issues if the wire is overhead along the street whenever it is winding and earthquake. It will also decrease our property's value if we just add the power pole along the street. [REDACTED] B5-2
[REDACTED] B5-3
[REDACTED] B5-4
[REDACTED] B5-5

We highly recommend to put the wire underground, I believe all the residents in the city do not want a power pole standing near their house. Please consider our suggestion. [REDACTED] B5-6

Thank you so much.

Best regards,

Kai Liu
7447 SILVER SADDLE CT, EASTVALE CA 92880.
[REDACTED]

3.3.5 Letter B5 – Responses to Comments from Kai Liu

- B5-1 The commenter provides an introductory statement. The comment is acknowledged.
- B5-2 The comment expresses concern about the overhead electric wires and asks why they cannot be put underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.
- B5-3 This comment discusses city property tax and associated responsibility to the environment. This comment does not address any concern or issue specifically related to the accuracy or adequacy of the Draft EIR.
- B5-4 As presented in the Draft EIR hazards and hazardous materials Impact 4.9-7 discussion, distribution and subtransmission line systems are designed to withstand high winds, and it is extremely rare for higher-voltage transmission structures to blow over. If this rare event does occur, the protection system on a subtransmission line is designed to detect faults, such as arching that would occur from debris contacting the line or if the line is severed, and shut off power flow in a fraction of a second. The proposed subtransmission line pole design would also be adequate to withstand the expected seismic loading (see geology and soils Draft EIR Impact 4.7-1 discussion). In addition, where new steel poles would replace old wood or steel poles, the structural integrity of the proposed new poles would be expected to be higher than the existing old poles, resulting in less of a potential for pole failure compared to baseline conditions.
- B5-5 The commenter’s concerns about the economic effects of the Project are outside the scope of CEQA. (CEQA Guidelines §§ 15064, 15131 (“Economic or social effects of a project shall not be treated as significant effects on the environment.... The focus of the analysis shall be on the physical changes.”)). For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.
- B5-6 The commenter recommends that the wires be put underground. The comment is noted. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Public Comment Card

SCE's Circle City Substation and Mira Loma-Jefferson 66 kV Subtransmission Line Project
Comment Period: June 4, 2018 - July 20, 2018



Commenter Name/Affiliation: Jane Anderson
Address: 6454 DAFFODIL CT EASTVALE CA 92880

Comment: _____

I have Lived in Eastvale Since 1999.
Underground Utilities was something I
Liked about this Community, NOT HAVING
to look AT Electric poles.

B6-1

I have Also observed many Accidents
over the years with Car versus poles
in this Area and Surrounding Areas.

B6-2

I will NOT Support Any decision
of overhead Lines, Put the Lines under
Ground so as not to burden our Area
with unnecessary overhead Lines, especially
since it has no benefit to Eastvale.

B6-3

3.3.6 Letter B6 – Responses to Comments from Jane Anderson

- B6-1 The comment expresses the dislike for looking at electrical poles. Comment noted. Because the comment is not related to environmental issues, no further response is required under CEQA. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B6-2 The commenter has observed car accidents involving poles. Comment noted. For discussion of traffic safety hazards that would be associated with the Project, refer to transportation and traffic Draft EIR Impact 4.17-5.
- B6-3 The comment requests that the overhead lines be put underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Maggie wang [REDACTED]
Sent: Wednesday, July 11, 2018 11:27 AM
To: CircleCityEIR
Subject: COMMENT ON THE DRAFT EIR

I am residents living in Eastvale, I don't approve of establishing high pole project, it would influence community environment is very beautiful, hope to established in the form of from underground embedded wire pole project, we live in here, this is our home, I very love our home, we hope that our community can have a beautiful environment, thank you very much

]

3.3.7 Letter B7 – Responses to Comments from Maggie Wang

- B7-1 The commenter expresses disapproval of the Project and appears to request underground lines. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines. The comment is noted, but does not address the adequacy or accuracy of the Draft EIR; therefore, no further response is required. The commenter’s overall concerns regarding the Project are noted and will be provided to the decisionmakers for their consideration prior to project approval.

Matthew Fagundes

From: Andy Diaz [REDACTED]
Sent: Sunday, July 15, 2018 4:28 PM
To: CircleCityEIR
Subject: Robert Peterson Circle City Project

Dear Mr. Peterson,
I live on Santa Anita rd. in Norco CA and I back up to the River Road portion of the Circle City Project between 2nd street and Corydon. The power poles and lines are physically in my backyard. I oppose to having the new larger poles and additional power lines installed for this project. My property value, children safety and my view are already at risk and the new upgrade would make it worst. I would like to see Edison install and place any new power lines and all of the existing lines underground along this portion of River Road instead. Please help us all in getting this done.

| B8-1
| B8-2
| B8-3

Sincerely,

Andy Diaz
[REDACTED]

3.3.8 Letter B8 – Responses to Comments from Andy Diaz

- B8-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B8-2 The comment expresses opposition to the Project based on risks to property value, children safety, and views. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality* and Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B8-3 The comment requests that the existing and proposed overhead lines along River Road be put underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: lauren pavlock [REDACTED]
Sent: Monday, July 16, 2018 7:49 PM
To: CircleCityEIR
Subject: ATTN:Robert Peterson Circle City Project

Dear Mr Peterson,

I live on Santa Anita rd in Norco, CA and i back up to the River Road portion of Circle City Project between 2nd st and Corydon. The power poles and lines are physically in my backyard. I oppose to having the new LARGER poles and additional power lines installed for this project. My property value, safety and my view are already at risk and the new upgrade will only make this worse. I propose Edison to install and place any new power lines and all of the existing lines underground along this portion of River Road instead. Please help us all on getting this done!

| B9-1
| B9-2
| B9-3

Sincerely,
Laura and Lauren Pavlock

3.3.9 Letter B9 – Responses to Comments from Lauren Pavloc

- B9-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B9-2 The comment expresses opposition to the Project based on risks to property value, safety, and views. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality* and Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B9-3 The comment proposes that the existing and proposed overhead lines along River Road be put underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Robert Peak [REDACTED]
Sent: Monday, July 16, 2018 1:59 PM
To: CircleCityEIR
Subject: River Road 66Kva Project

I live on Santa Anita Rd and back up to River Road. I currently have a power pole in the middle of my back yard. It buzzes on occasion, forces me to have cable TV for the first time in my life, and is generally an eyesore. After reviewing the parts of the eir related to the River Road portion of the project, I see that trenching and burying some of the new lines is already planned along River Road. I feel it would not be a tremendous hardship on the project to increase the size and depth of the trenches and put all the lines underground. The new steel poles will further depress the value of my property as they will host more lines and probably be taller. We have on occasion had Santa Ana winds strong enough to blow my 10' by 20' canopy off the ground over a fence and into my pool. The additional lines above ground will also increase the negative electromagnetic effects as, I believe, they are increasing the number and voltage of the lines. Please consider the property impact, safety and esthetics for the residents along this portion of the project and put all new and existing services underground.

B10-1
B10-2
B10-3
B10-4
B10-5

Sincerely

Robert D Peak
2110 Santa Anita Rd

3.3.10 Letter B10 – Responses to Comments from Robert Peak

- B10-1 The comment is an introductory statement that describes the location of the commenter’s property, and indicates that the existing lines along River Road buzzes and is an eyesore. This comment is noted. Because the comment is not related to environmental issues, no further response is required under CEQA. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B10-2 The commenter states that some of the new lines are proposed to be undergrounded in River Road. To clarify, the existing 33 kV distribution line along River Road would be converted to underground between Corydon Avenue and North Cota Street to accommodate the proposed new subtransmission line (see the seventh paragraph in Draft EIR project description Section 2.5.2.4, Mira Loma-Jefferson 66 kV Subtransmission Line).
- B10-3 The comment suggests that the existing and proposed overhead lines along River Road should be put underground and that overhead lines would depress property values. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines and for discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.
- B10-4 As presented in the Draft EIR hazards and hazardous materials Impact 4.9-7 discussion, distribution and subtransmission line systems are designed to withstand high winds, and it is extremely rare for higher-voltage transmission structures to blow over. In addition, the structural integrity and strength of the proposed new light-weight steel poles would be stronger than the existing old wood poles, resulting in less of a potential for pole failure compared to baseline conditions. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- B10-5 The comment requests consideration of property, safety, and aesthetics and states the new and existing lines should be installed underground. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality* and Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*. Also, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Comment Letter B11

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

SCH No. 2016021012

Needs to be sent in by July 20th

Email To: circlecityeir@esassoc.com

Attn: Robert Peterson Circle City Project

Sample email:

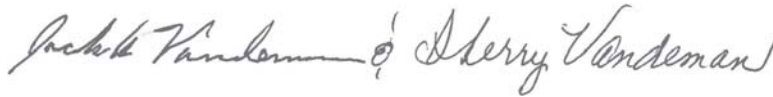
Dear Mr. Peterson, I live on Santa Anita RD. in Norco CA. and I back up to the River Road portion of the Circle City Project between 2nd street and Corydon. The power poles and lines are physically in my backyard. I oppose to having the new larger poles and additional power lines installed for this project. My property value, safety and my view are already at risk and the new upgrade will only make this e Edison install and place any new power lines and all of the existing lines underground along this portion of River Road instead. Please help us all on getting this done.

B11-1

B11-2

Sincerely

"your name here"



3.3.11 Letter B11 – Responses to Comments from Jack and Sherry Vandeman

- B11-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B11-2 The comment expresses opposition to the Project based on risks to property value, safety, and views, and suggests that the existing and new lines along River Road should be installed underground. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality* and Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*. Also, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Scott Detki [REDACTED]
Sent: Wednesday, July 18, 2018 6:59 PM
To: CircleCityEIR
Subject: Power lines in Norco

Dear Mr. Peterson,

I live on Santa Anita Rd. in Norco, CA and my residence backs up to the River Road portion of the Circle City Project between [2nd street](#) and Corydon. The power poles and lines are physically in my backyard and I OPPOSE to having the new larger poles and additional power lines installed for this project. Norco is nicknamed “Horsetown USA” and is a rural town. Most people that move to Norco like the small town-rural environment. My property value, safety and my view are already at risk and the new upgrade will only make it worse. I am asking you to please place all NEW and EXISITING lines underground along this portion of River Road instead. Please help us on getting this accomplished.

| B12-1
|
| B12-2
|
| B12-3

Sincerely,

Scott Detki

Sent from my iPhone

3.3.12 Letter B12 – Responses to Comments from Scott Detki

- B12-1 The comment is an introductory statement that describes the location of the commenter’s property and expresses opposition to the Project. Comment noted.
- B12-2 The comment suggests that the Project would result in risks to property value, safety, and views. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, and Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B12-3 The comment proposes that the existing and proposed overhead lines along River Road be put underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Detki, Brittney [REDACTED]
Sent: Wednesday, July 18, 2018 6:30 AM
To: CircleCityEIR
Subject: Attn:Robert Peterson Circle City Project

Dear Mr. Peterson,
I live on Santa Anita Rd. in Norco, CA and my residence backs up to the River Road portion of the Circle City Project between 2nd street and Corydon. The power poles and lines are physically in my backyard and I OPPOSE to having the new larger poles and additional power lines installed for this project. Norco is nicknamed "Horsetown USA" and is a rural town. Most people that move to Norco like the small town-rural environment. My property value, safety and my view are already at risk and the new upgrade will only make it worse. I am asking you to please place all NEW and EXISTING lines underground along this portion of River Road instead. Please help us on getting this accomplished.

| B13-1
| B13-2
| B13-3

Sincerley,
Brittney Detki

3.3.13 Letter B13 – Responses to Comments from Brittney Detki

- B13-1 The comment is an introductory statement that describes the location of the commenter’s property and expresses opposition to the Project. Comment noted.
- B13-2 The comment suggests that the Project would result in risks to property value, safety, and views. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B13-3 The comment proposes that the existing and proposed overhead lines along River Road be put underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Sayeh Koetsier [REDACTED]
Sent: Wednesday, July 18, 2018 12:02 PM
To: CircleCityEIR
Cc: aokoro@ci.norco.ca.us; citycouncil@ci.norco.ca.us
Subject: Re: Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

Re: Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

Attn: Robert Peterson, Circle City Project and Matthew Fagundes, Environmental Science Associates

CC: Andy Okoro, Norco City Manager and City Council, Norco

SCH No. 2016021012

To whom it may concern,

I live on Santa Anita Road in Norco, CA and will be one of the residents impacted by the Circle City Project between 2nd Street and Corydon. Since we were first notified of the plans to put in these new power poles and lines, I became very concerned not only for the health and safety of my family but also the negative outcome to our property. | B14-1
| B14-2

As you are aware, the current power poles and lines already obstruct the views of those of us living on the path. One of the benefits of our homes is the gorgeous view of the mountains and sunsets. And these proposed power poles and lines would make the views even more undesirable as they ultimately decrease property value. Let's be honest, who wants to look at tall metal poles everyday. | B14-3

Most people who live in Norco have animals such as horses, chickens, goats, etc. And as a resident who has animals I'm very concerned for their safety near these proposed poles and lines. Additionally what ill effects will these power poles and lines have on our garden, trees, fruits, and vegetables as well as the soil? | B14-4
| B14-5

Furthermore, in the event of a major natural disaster such as an earthquake these power poles and lines would have life-threatening consequences on those of us living near it. Having lived through a major quake when I resided in Northern California, I cannot stress to you how frightening such an event is especially when you're near such structures. And despite all efforts in safety, Mother Nature always wins.

B14-6

One major concern that I have is on human health especially those of us who have young children. What are the effects of these new poles and lines? What happens to those who have compromised immune systems or chronic health issues? What are the long-term effects of living near these poles and lines? I don't believe we really know these answers nor do we fully understand the effects. And I would hate to find out a few years from now that these power poles and lines have catastrophic consequences on human health and well-being.

B14-7

While I understand the need for this upgrade, I do not agree or support the idea of the proposed power poles and lines for the reasons I have stated above. And I'm certain that if you and other city members lived in the same path, you too would be very concerned and against this plan.

B14-8

I do however support an underground installation that would ultimately be the best solution at this time. I urge you to please think about those of us who are being negatively impacted as well as future residents. And mostly, the negative consequences to our cities.

B14-9

I look forward to your response. Please feel free to contact me at anytime should you need to further discuss this matter.

B14-10

Thank you for your time.

- Sayeh Koetsier -



3.3.14 Letter B14 – Responses to Comments from Sayeh Koetsier

- B14-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B14-2 The commenter expresses concern relative to the Project associated with safety and negative outcome to property. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.
- B14-3 The comment suggests that the Project would make the views along the Project alignments more undesirable and would ultimately decrease property value. Comment noted. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.
- B14-4 The commenter expressed concern for the safety of horses, chickens, goats, etc., living near the proposed poles and lines. Although the Draft EIR does not specifically evaluate Project-related safety concerns relative to horses, chickens, goats, etc., it is assumed that the Project safety-related impacts identified in Draft EIR would also apply to animals. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, and for the hazard impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*.
- B14-5 For the evaluation of the Project’s effects on soils, refer to the Draft EIR geology and soils Impact 4.7-3 through 4.7-5 discussions, as well as hazards and hazardous materials Impact 4.9-1. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues. With the exception of the possible need for trimming large trees, there is no evidence or reason to suggest that the Project could have an impact on the commenter’s garden, trees, fruits, and/or vegetables.
- B14-6 As discussed in the geology and soils Draft EIR Impact 4.7-1 discussion, the subtransmission line poles would be designed consistent with CPUC GO 95, Rules for Overhead Line Construction, to withstand wind, temperature, and wire tension loads. Accounting for these factors would result in a design that would be adequate to withstand expected seismic loading. In addition, the subtransmission line poles would be required to comply with California Building Code Chapter 16, a process which would include identifying the seismic design category of Project structures (factoring in

the occupancy category of the structure, site class, soil classifications, and various seismic coefficients), determining the associated seismic design specifications, conducting any required site investigations, and incorporating any ground-stabilizing measures into Project design. Also, the structural integrity and strength of the proposed new light-weight steel poles would be stronger than the existing old wood poles, resulting in less of a potential for pole failure compared to baseline conditions. Therefore, the EIR determined that the impact associated with risk to people due to a pole failure during an earthquake is less than significant.

- B14-7 Potential health and safety impacts of the proposed Project are discussed in Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- B14-8 The comment expresses lack of support for the Project due to the issues discussed in Comments B14-2 through B.14-7. Comment noted.
- B14-9 The comment proposes an underground solution to the proposed overhead poles. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.
- B14-10 The comment is a conclusion statement. No response is necessary.

Matthew Fagundes

From: Norene Eifler [REDACTED]
Sent: Wednesday, July 18, 2018 3:27 PM
To: CircleCityEIR
Subject: Attn: Mr. Robert Peterson Circle City Project

Dear Mr Peterson, I live on Santa Anita RD in Norco, CA and I back up to the River Road portion of the Circle City Project between Second street and Corydon. The power poles and lines are physically in my backyard. I am not opposed to Edison's proposed project but I am opposed to the installation of the new larger poles and more higher voltage lines above ground, above my property. The existing poles and lines already have a negative impact on my property value, safety, aesthetics and my privacy are also at risk. I have horrible migraines that I contribute to the EMF's that radiate from these lines not to mention the humming I can hear coming from them. The new poles and lines will make all of this even worse. I am asking and begging the CPUC and Edison to make the right decision and place the existing and any new lines underground along this stretch. Edison is always talking in their commercials about how proud they are to be a part of the communities they serve and how hard they work to constantly improve those communities. It is time they prove it to us by placing this project underground along this stretch of River Road in Norco.

B15-1
B15-2
B15-3

Sincerely
Norene Eifler

3.3.15 Letter B15 – Responses to Comments from Norene Eiffler

- B15-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B15-2 The comment expresses opposition to the Project based on risks to property value, safety, views, health effects of electric and magnetic fields (EMF), and humming. For discussion of Project effects associated with economic impacts, including loss of property values, and how EMF is addressed in this EIR, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*. For discussion of impacts that would be associated with corona discharge noise, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1. The privacy concerns are noted; social issues are beyond the scope of the EIR’s environmental analysis (see CEQA Guidelines § 15131(a)).
- B15-3 The comment requests that the existing and proposed lines along River Road be placed underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: James Alderson [REDACTED]
Sent: Thursday, July 19, 2018 2:17 PM
To: CircleCityEIR
Subject: Attn: Robert Peterson - Circle City Project

Edisons Cirde City Substation and Mira Loma-Jefferson Subtransmission Line
ProjectAi.542007)
SCH No. 20160Z101.2

Dear Mr. Peterson:

I live on Santa Anita RD. in Norco and my property backs up to the River Road portion of the Circle City Project between 2nd street and Corydon. The power poles and lines are physically in my backyard. I oppose to having the new larger poles and additional power lines installed for this project. This project would devalue my property, put my property and safety at risk and ruin my already blighted view. The safest and .best alternative to this proposed project is the installation of underground power lines. Cost is the only reason Edison is proposing the installation of these monstrous power lines in a residential community. Mr. Peterson, do what is right for the citizens of Norco and vote for safety and the beautification of our City. Do not approve of these power poles. If this project goes forward, the residents will be forced to used legal remedies to resist its installation.

B16-1
B16-2
B16-3

Sincerely,

JAMES ALDERSON DVM, MBA

[REDACTED]

JAMES ALDERSON

[REDACTED]

3.3.16 Letter B16 – Responses to Comments from James Alderson

- B16-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B16-2 The comment expresses opposition to the Project based on issues associated property devaluation, risk to property and safety, and views. For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B16-3 The comment states that the best alternative is to install the proposed lines underground within River Road. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

As a point of clarification, approval or rejection of an alternative, set of alternatives, or the Project will be decided by the five-member Commission during the Formal Proceeding process for Application A.15-12-007. Energy Division staff are responsible for preparing the environmental documentation for proposed power line projects under CPUC jurisdiction, but do not have a say in the approval, or outcome, of projects.

Matthew Fagundes

From: Steve Tuthill [REDACTED]
Sent: Thursday, July 19, 2018 8:05 AM
To: CircleCityEIR; CircleCityEIR
Cc: CLorimore@Eastvaleca.gov; JTessari@EastvaleCA.gov
Subject: Overhead Power Lines Risks

Mr. Robert Peterson Circle City Project c/o Matthew Fagundes, Environmental Science Associates:

I am sending this email in opposition to placing overhead powerlines in Eastvale. In addition to obvious eyesore issues, there is credible research on health hazards associated with overhead powerlines. Eastvale is a new and modern city that should reflect its popular standing as a resident safety concerned city as well.

| B17-1

Steve Tuthill
13731 Hidden River
Eastvale, CA 92880
[REDACTED]

Below are a few articles that relate overhead power lines to increased cancer risks:

1. Lower cost & simplified siting process in urban locales

Siting transmission projects in urban, metropolitan areas can be challenging — overhead line requires land acquisition in the right-of-way for support structures like towers, poles and overhead conductors. Land acquisition comes with inherent challenges like removal of structures for electrical clearances in the line’s path, and often, a large price tag.

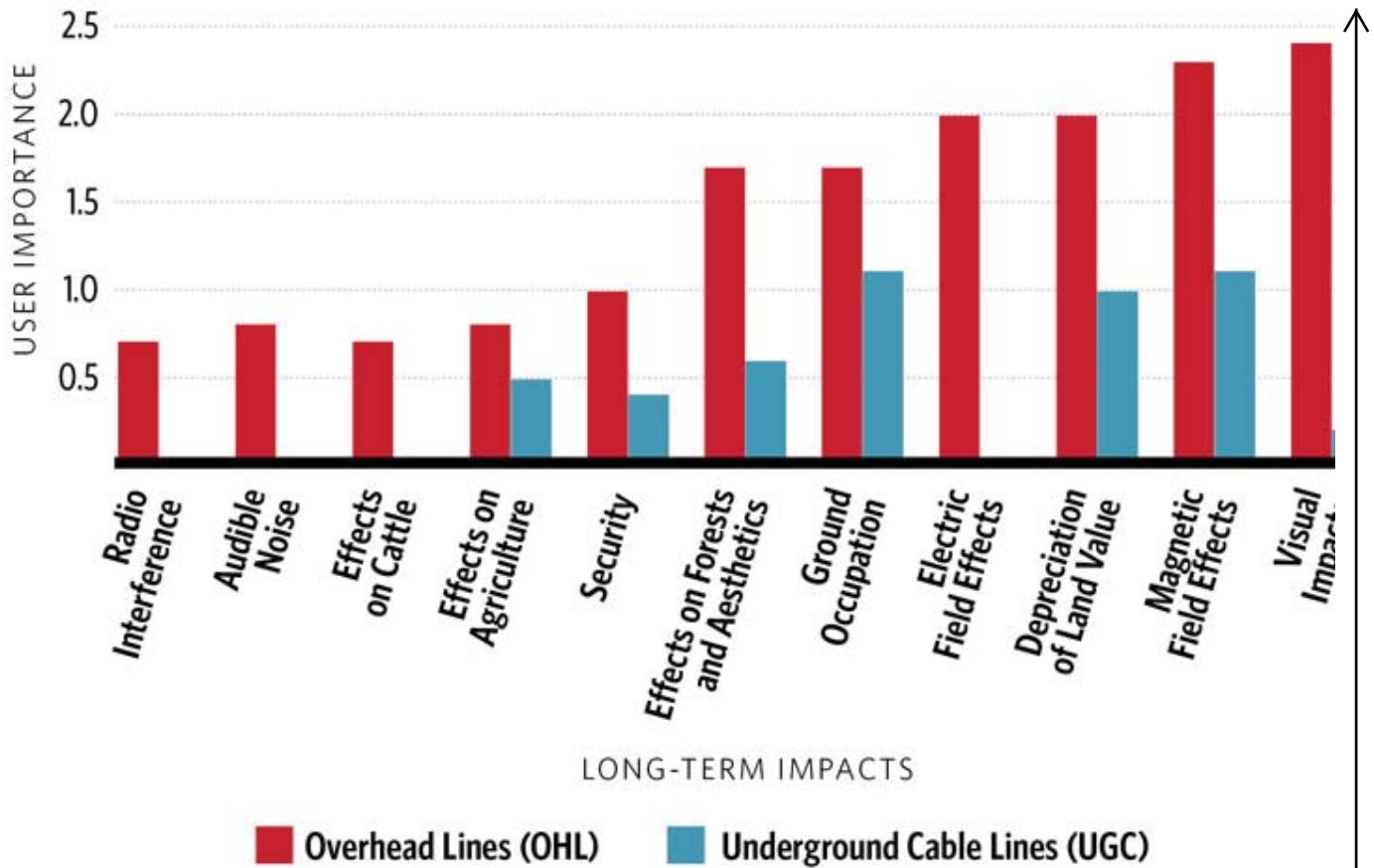
Enter underground transmission. Underground lines can be installed in dedicated public thoroughfares with dense population, and don’t require right-of-way acquisition. Since land acquisition can be a major cost for transmission projects, underground lines are often more economical.

| B17-2

2. Minimal impact to the surrounding visual environment

Underground transmission preserves natural beauty and land value. The lines are out of sight, which answers one of the main concerns for overhead lines—esthetic impact. While impacts vary per location, by nature overhead lines permanently alter the look of residential neighborhoods, scenic areas and historical sites.

While esthetic impact isn’t the only transmission line concern, it tops the list of long-term impacts that can’t be mitigated. The International Council on Large Electrical Systems, or CIGRÉ, compared the impacts of greatest environmental concern for overhead lines (OHL) and underground cable lines (UGC) in its technical brochure 110.



B17-2
cont.

Source: CIGRÉ

3. System hardiness & reliability

Cable systems constructed underground have minimal impact from atmospheric conditions, with the exception of end points where cables and terminations are exposed on poles, substations and compounds. At a time where system reliability is top-of-mind for most utilities, underground transmission is a dependable solution.

Underground lines survive in the face of extreme conditions including:

- Atmospheric conditions including hurricanes, typhoons, tornadoes, wind and ice storms
- Human activities like vandalism and terrorism
- Natural disasters including landslides, floods, and in some cases, even seismic activity

4. Safety

Burying transmission lines is inherently safe. Underground cables are insulated, electrically shielded, and out of the way. Outside of the limited points where cable accessories like terminations are exposed at poles, terminal towers and substations, underground transmission poses very little risk:

- No electrocution hazard for people or wildlife
- No collision or entanglement hazards for small planes or helicopters

- No risk of line exposure from traffic collisions
- No fire risk to people, wildlife, nature or homes from arching lines during windy conditions

Underground transmission is safely out of reach.

5. Public Support

Stakeholders from the community, including residents, businesses, land owners and environmental groups rally behind underground transmission because it minimizes impacts to the community, while reliably delivering power. In Chino Hills, California, Southern California Edison is building out a 500 kilovolt underground line backed by the community after [opposition to an overhead line](#) was voiced, spurring a ruling for underground transmission by the California Public Utility Commission.

New evidence links power lines and cancer

By Andrew Alderson, Chief Reporter

12:01AM BST 06 Oct 2002

Overhead power lines and household electrical appliances increase the risk of developing cancer, according to the findings of an eight-year study into the effects of electromagnetic fields (EMFs).

The £4.5 million study, the largest held into the effects of EMFs on health, suggests that hundreds of thousands of Britons, particularly children, are at risk from life-threatening illnesses linked to the emissions. Pregnant women are also at greater risk of miscarrying.

Its findings will be seized on by campaigners who argue that EMFs from overhead power lines and mobile phone masts are responsible for cancer and leukaemia "clusters" across Britain.

The National Radiological Protection Board, the Government watchdog on radiation, reported last year that its studies into the effect of EMFs had been inconclusive.

The latest study was commissioned by the California Public Utilities Commission, which is expected to publish the full report in the next few months. Scientists reviewed scores of previous studies from all over the world, including Britain, and carried out new research in the San Francisco area.

The researchers told The Telegraph that they believe that EMFs increase the risks of life-threatening illnesses including childhood leukaemia, adult brain cancer and amyotrophic lateral sclerosis, a degenerative disease that attacks nerve cells in the brain and spinal cord.

Dr Raymond Neutra of the California Department of Health Services, who led the research, said: "In Britain, hundreds of thousands of homes are exposed to levels [of EMFs] that mean they could be at risk."

Dr Vincent DelPizzo, a senior member of the research team, said: "People have a right to be warned but whether a major effort to reduce EMFs is appropriate must still be decided."



B17-2
cont.

The first suspected link between overhead power lines and cancer was made in America in 1979. Some reports, however, have dismissed a connection, while others have said that evidence is inconclusive. Until now, those considering long and costly legal action have been advised that it would probably fail because of lack of proof.

John Scott, the Conservative MSP for Ayr who led an unsuccessful campaign to stop the erection of more than 200 pylons in South Ayrshire, said yesterday: "The implications of this [study] could be enormous for the power-generating companies."

If the report bolsters demands for the burying of all power cables, the cost will run into billions of pounds. A spokesman for the Electricity Association said: "If the Government ever decreed that power lines had to be placed underground then the costs would be passed straight on to the consumer."

Every mile of underground cabling costs nearly £16 million to install, whereas overhead cables cost about £800,000 over the same distance.

The power companies could face a string of lawsuits from families who claim to have been affected by EMFs, as could manufacturers of domestic appliances.

Martyn Day, a solicitor representing a dozen families who are considering legal action against power companies they claim were negligent, said: "The evidence has been accumulating over the past 23 years and this sounds a very significant piece of additional information."

Among those who claim to have been affected are Ray and Denise Studholme, who believe that their son Simon would still be alive if he had not been subjected to a strong electromagnetic field in his bedroom.

As Simon slept, his head was less than 3ft from an electricity meter and a burglar alarm in a hall cupboard. According to the family, tests after their son's death revealed that the two appliances gave off an EMF more than six times the recommended safe limit.

Simon was diagnosed with leukaemia in November 1990, nearly two years after the family moved to their three-bedroom home near Bolton, Greater Manchester. He died in September 1992, aged 13.

The family hopes to use the study's findings to resume a test case against Norweb, their electricity supplier. They dropped a civil case five years ago after losing their right to legal aid.

"We faced an uphill battle all the way to win compensation," said Mr Studholme, 54, who has retired from his job as a financial adviser because of his poor health.

"If I had known about the electromagnetic fields Simon would not have been sleeping there. Within six months of moving here he used to get up in the morning complaining of headaches and feeling light-headed," said Mr Studholme.

In America up to five per cent of homes have EMF levels considered potentially dangerous. It is estimated that the same percentage of homes in Britain could be at risk, either because of nearby power lines, internal wiring or electrical equipment.

Dr Michael Clark, the scientific spokesman for the National Radiological Protection Board, said yesterday that the board welcomed new research into the effect of EMFs but would not comment on the findings from California until it had studied the full report.

B17-2
cont.

Roger Coghill, who runs an independent science laboratory in Pontypool, Gwent, and who has studied the effect of EMFs on people's health for more than a decade, said that he was impressed by the latest research project.

"This is a huge, well-conducted study and people must pay attention to its results. Some power companies have deliberately suppressed research in this field. But in the end the truth will out and here it is.

"We are all on the same side: we all want electricity but none of us wants brain tumours."

Exactly how cancer could be caused by such exposure remains a mystery, however. The strength of the magnetic fields falls away rapidly from overhead power lines - just a few dozen yards from a pylon registers well below the natural magnetic field level of the Earth. Studies of living cells and animals exposed to such weak fields have hitherto failed to reveal any changes normally linked to cancer.

Living near overhead high voltage transmission power lines as a risk factor for childhood acute lymphoblastic leukemia: a case-control study.

[Sohrabi MR¹, Tarjoman T, Abadi A, Yavari P.](#)

[Author information](#)

Abstract

This study aimed to investigate association of living near high voltage power lines with occurrence of childhood acute lymphoblastic leukemia (ALL). Through a case-control study 300 children aged 1-18 years with confirmed ALL were selected from all referral teaching centers for cancer. They interviewed for history of living near overhead high voltage power lines during at least past two years and compared with 300 controls which were individually matched for sex and approximate age. Logistic regression, chi square and paired t-tests were used for analysis when appropriate. The case group were living significantly closer to power lines (P<0.001). More than half of the cases were exposed to two or three types of power lines (P<0.02). Using logistic regression, odds ratio of 2.61 (95%CI: 1.73 to 3.94) calculated for less than 600 meters far from the nearest lines against more than 600 meters. This ratio estimated as 9.93 (95%CI: 3.47 to 28.5) for 123 KV, 10.78 (95%CI: 3.75 to 31) for 230 KV and 2.98 (95%CI: 0.93 to 9.54) for 400 KV lines. Odds of ALL decreased 0.61 for every 600 meters from the nearest power line. This study emphasizes that living close to high voltage power lines is a risk for ALL.

Living too close to overhead power lines could increase the risk of childhood leukemia according to a major study.

The research carried out at Oxford University discovered that children who had lived within 200m of high voltage lines at birth had a 70% higher risk of leukaemia than those 600m or more away.

Regards,

Steve Tuthil

Knowledge is knowing a tomato is a fruit ... Wisdom is not putting it in a fruit salad.



B17-2
cont.

3.3.17 Letter B17 – Responses to Comments from Steve Tuthill

- B17-1 The comment expresses opposition to the Project based on eyesore issues and health hazards. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- B17-2 The commenter provided articles that relate overhead power lines to increased cancer risk. The articles are acknowledged. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.

Matthew Fagundes

From: Jay Ballesteros [REDACTED]
Sent: Friday, July 20, 2018 9:25 PM
To: CircleCityEIR
Subject: New proposed power lines in Eastvale

To whom it may concern,

I have been a resident of the City of Eastvale for 8 years and live on the east border of Hellman where you are proposing additional power lines be added. Additional power lines on the existing power poles would create an eyesore not only for the residents of Eastvale but for the residents of Chino as well. I do not understand how a company that promotes

| B18-1

“Our Commitment to Clean Energy

From healthier air to stronger communities, we believe that clean, reliable energy makes life better for all Southern California.”

| B18-2

would consider a project that will have an adverse effect on the community. I have spoken to several of my neighbors and have yet to speak to one that supports your proposal. The negative health effects caused by power lines too close to homes are my greatest concern. I have a child and want him to grow up in a healthy environment. There are many parents in the neighborhood that share my concerns.

| B18-3

There have been many construction projects on Hellman for the past several years. The road has been dug up several times and the lines could have been run underground. I’ve worked in Orange County and can’t help but notice that “master planned” communities in Irvine and Tustin have buried their power lines. Why should we be any different? I take pride in my community and am asking you to consider burying the power lines to “make life better for all Southern California.”

Please feel free to contact me.

Deeply concerned,

Jay Ballesteros
14911 Brooktree St.
Eastvale, Ca. 92880
[REDACTED]

3.3.18 Letter B18 – Responses to Comments from Jay Ballesteros

- B18-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B18-2 The commenter states that the Project would create an eyesore for the residents of Eastvale and Chino. Comment noted. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B18-3 This comment expresses concern regarding negative health effects of the proposed power lines. Comment noted. Potential health and safety impacts of the proposed Project are discussed in the Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality* and Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*.

The comment requests that the power lines be placed underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Brandon Plott [REDACTED]
Sent: Friday, July 20, 2018 9:19 AM
To: CircleCityEIR
Subject: Circle City Project

Good Morning Mr. Peterson,

The purpose of this email is to send my opposition of the Proposed Above Ground Power Lines at the City Circle Project. As our current City Councilman for the City of Eastvale, I would like to address some of my concerns and the concerns of our Citizens: [B19-1

- Our property values will be negatively affected. [B19-2

- The net benefit of these lines is NOT for Eastvale yet the burden is ours. [B19-3

- Potential fire and safety concern with the winds we have in Eastvale. [B19-4

Let's continue to look and address other alternatives to a safer and more aesthetic approach to these Power Lines. [B19-5

Best Regards,

Brandon Plott
Councilmember
City of Eastvale
12363 Limonite Ave., Suite 910
Eastvale, CA 91752

[REDACTED]
[REDACTED]
[REDACTED]

3.3.19 Letter B19 – Responses to Comment from Brandon Plott

- B19-1 The comment is an introductory statement expressing opposition to the Project. The commenter’s concerns are addressed in responses to Comments B19-2 through B19-5.
- B19-2 For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.
- B19-3 The comment suggests that the City of Eastvale would bear the burden of lines, while the net benefit would not be for the City. Comment noted.
- B19-4 As presented in the Draft EIR hazards and hazardous materials Impact 4.9-7 discussion, distribution and subtransmission line systems are designed to withstand high winds, and it is extremely rare for higher-voltage transmission structures to blow over. If this rare event does occur, the protection system on a subtransmission line is designed to shut off power flow in a fraction of a second. In addition, where new steel poles would replace old wood or steel poles, the structural integrity of the proposed new poles would be expected to be higher than the existing old poles, resulting in less of a potential for pole failure compared to baseline conditions. For discussion of wildfire impacts that would be associated with the Project, refer to the Impact 4.9-6 and 4.9-7 discussions in Draft EIR Section 4.9, *Hazards and Hazardous Materials*.
- B19-5 The comment is a conclusion statement recommending consideration of other alternatives, generally, but does not identify any specific alternatives beyond those addressed and analyzed in the Draft EIR. As described in Draft EIR Chapter 3, *Project Alternatives*, the EIR considered a reasonable range of potentially feasible alternatives that focus of avoiding or substantially lessening the significant effects of the Project.

Matthew Fagundes

From: Colleen Powers [REDACTED]
Sent: Friday, July 20, 2018 8:05 AM
To: CircleCityEIR
Subject: COMMENTS on Circle City Substation & Mira Loma-Jefferson Subtransmission Line Project

To Whom It May Concern,

My husband Larry and I have grave concerns about the health and safety of our neighborhood not to mention the increased obstruction of our views the constructing of more above ground power lines would cause. I have attached a picture from the sidewalk in front of our home showing just one set of the power lines that already surround our neighborhood. Adding additional powers lines would double the chance for safety issues to arise. Also the very top of our neighborhood contains huge electrical towers in the American Heritage Park. When you walk through the park you can hear the power lines buzzing because of the amount of power surging through them. And this is within less than a block of homes! These are NOT minor concerns. This is a large neighborhood that is already surrounded by a significant electrical power! As well, none of this even broaches the issue of the high winds we consistently have in this area. There are several another points I could mention, such as the lawsuits when health issues begin to surface and the public relations nightmare when the news outlets find out about it, things which will cost more in the long run that the extra expense of placing the powers line elsewhere. There are still plenty of other open spaces in this area to place powers lines. Eastvale is one of the few newer areas that has allowed above ground power lines. We do not want any more! SCE was not allowed to add more in Chino Hills and they should not be allowed to do so in Eastvale!

B20-1

B20-2

B20-3

B20-4

Sincerely,
Larry & Colleen Powers
14930 Murwood Lane
Eastvale, CA 92880
[REDACTED]



3.3.20 Letter B20 – Responses to Comment from Colleen Powers

- B20-1 The comment expresses health and safety and view obstruction concerns associated with the Project. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*, and for discussion of how EMF is addressed in this EIR, refer to Master Response 2: Non-CEQA Issues. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B20-2 The large towers in the vicinity of American Heritage Park support 500 kilovolt (kV) transmission lines. The buzzing of these lines, referred to as corona discharge noise in the Draft EIR, is much louder than would occur under the proposed Mira Loma-Jefferson 66 kV subtransmission line. For discussion of the corona discharge noise that would be associated with the proposed Project, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1.
- B20-3 The commenter references high winds and health concerns associated with the Project. Refer to response to comments B19-4 and B20-1.
- B20-4 The commenter requests that the power lines be placed in open spaces, but does not provide a suggested route for consideration. Comment noted. As described in Draft EIR Chapter 3, *Project Alternatives*, the EIR considered a reasonable range of potentially feasible alternatives that focus on avoiding or substantially lessening the significant effects of the Project.

Matthew Fagundes

From: Natalie George [REDACTED]
Sent: Friday, July 20, 2018 3:54 PM
To: CircleCityEIR
Subject: SCH No. 2016021012

Edison’s Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)
SCH No. 2016021012

Attn: Robert Peterson Circle City Project

Dear Mr. Peterson,

My name is Natalie George and I live on Santa Anita Rd. in Norco CA. My home backs up to River Rd., which is a portion of the Circle City Project between 2nd Street and Corydon. The power poles and lines are physically in my backyard. I am completely opposed to having the new larger poles and additional power lines installed for this project. This will not only affect my property value, my view, but also puts the safety and well-being of my family and animals at risk. I am not opposed to the project but feel the best solution for all involved is that the lines be placed underground.

B21-1
B21-2

Thank you,

Natalie George

3.3.21 Letter B21 – Responses to Comments from Natalie George

- B21-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B21-2 The comment expresses opposition to the Project based effects on property value, views, and safety. For discussion of Project effects associated with economic impacts, including loss of property values, and how the Draft EIR handles issues associated with electric and magnetic fields (EMF), refer to Master Response 2: Non-CEQA Issues. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*.

The comment requests that the existing and proposed overhead lines along River Road be put underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Tom Eifler [REDACTED]
Sent: Friday, July 20, 2018 12:38 PM
To: CircleCityEIR
Subject: Rob Peterson CPUC, c/o Matt Fagundes "Circle City Project"

Dear Mr. Peterson and Fagundes

I am writing to you in regards to the Circle City Project. I live on Santa Anita rd in Norco and back up to the River Road leg of this project between Second street and Corydon. My home is directly impacted by this project because the power poles are physically in my backyard. The existing lines and poles already have a negative effect on our property values, our health, safety and aesthetics as well. The new lines and poles will only make these matters worse. I am not against Edison's project but I do oppose it being above ground. I would like to see the existing poles and lines and any and all new lines be placed underground. Please help us make this project go underground thru our neighborhood.

| B22-1
| B22-2
| B22-3

Sincerely

Tom Eifler

3.3.22 Letter B22 – Responses to Comments from Tom Eifler

- B22-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B22-2 The comment expresses opposition to the Project based effects on property value, health and safety, and aesthetics. For discussion of Project effects associated with economic impacts, including loss of property values, and how the Draft EIR handles issues associated with electric and magnetic fields (EMF), refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Section 4.3, *Air Quality*, Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B22-3 The comment requests that the existing and proposed overhead lines along River Road be put underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Fidencio Zepeda [REDACTED]
Sent: Friday, July 20, 2018 6:10 AM
To: CircleCityEIR
Subject: So Cal Edison power lines

To whom it may concern,

I have been a resident of the City of Eastvale for 10 years and live on the east border of Hellman where you are proposing additional power lines be added. Additional power lines on the existing power poles would create an eyesore not only for the residents of Eastvale but for the residents of Chino as well. I do not understand how a company that promotes

B23-1
B23-2

“Our Commitment to Clean Energy

From healthier air to stronger communities, we believe that clean, reliable energy makes life better for all Southern California.”

B23-3

would consider a project that will have an adverse effect on the community. I have spoken to several of my neighbors and have yet to speak to one that supports your proposal. The negative health effects caused by power lines too close to homes are my greatest concern. I have children and want them to grow up in a healthy environment. There are many parents in the neighborhood that share my concerns.

There have been many construction projects on Hellman for the past several years. The road has been dug up several times and the lines could have been run underground. I work in Orange County and can't help but notice that “master planned” communities in Irvine have buried their power lines. Why should we be any different? I take pride in my community and am asking you to consider burring the power lines to “make life better for all Southern California.”

B23-4

Please feel free to contact me.

Deeply concerned,

Fidencio Zepeda
14950 Brooktree St.
Eastvale, Ca. 92880
[REDACTED]

3.3.23 Letter B23 – Responses to Comments from Fidencio Zapeda

- B23-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B23-2 The commenter states that the Project would create an eyesore for the residents of Eastvale and Chino. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B23-3 This comment expresses concern regarding negative health effects of the proposed power lines. Potential health and safety impacts of the proposed Project are discussed in the Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- B23-4 The comment requests that the power lines be placed underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: Rushabh Shah [REDACTED]
Sent: Friday, July 20, 2018 9:07 PM
To: CircleCityEIR
Subject: Regarding the power lines on Hellman Ave

To whom it may concern,

I have been a resident of the City of Eastvale for 10 years and live on the east border of Hellman where you are proposing additional power lines be added. Additional power lines on the existing power poles would create an eyesore not only for the residents of Eastvale but for the residents of Chino as well. I do not understand how a company that promotes

B24-1
B24-2

Our Commitment to Clean Energy

From healthier air to stronger communities, we believe that clean, reliable energy makes life better for all Southern California.

B24-3

would consider a project that will have an adverse effect on the community. I have spoken to several of my neighbors and have yet to speak to one that supports your proposal. The negative health effects caused by power lines too close to homes are my greatest concern. I have children and want them to grow up in a healthy environment. There are many parents in the neighborhood that share my concerns.

There have been many construction projects on Hellman for the past several years. The road has been dug up several times and the lines could have been run underground. I work in Orange County and can't help but notice that master planned communities in Irvine have buried their power lines. Why should we be any different? I take pride in my community and am asking you to consider burying the power lines to make life better for all Southern California.

B24-4

Please feel free to contact me.

Deeply concerned,

Rushabh Shah
14971 Brooktree St.
Eastvale, Ca. 92880

3.3.24 Letter B24 – Responses to Comments from Rushabh Shah

- B24-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B24-2 The commenter states that the Project would create an eyesore for the residents of Eastvale and Chino. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B24-3 This comment expresses concern regarding negative health effects of the proposed power lines. Potential health and safety impacts of the proposed Project are discussed in the Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- B24-4 The comment requests that the power lines be placed underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

Matthew Fagundes

From: [REDACTED]
Sent: Friday, July 20, 2018 12:20 PM
To: CircleCityEIR
Subject: Rob Peterson, CPUC c/o Matt Fagundes "Circle City Project"
Attachments: Edison city letter and petition20180720_12020956.pdf

Dear Mr. Peterson and Fagundes

The attached file is a petition pertaining to the Circle City Edison Project and is signed by the homeowners and residents that will be directly impacted by this project. A copy of a letter from the Norco city Mayor and counsel members and the city manager. is also included. You will receive the original copies of the letter and the signed petition in the mail today Fri July 20th. Please take some time to read it over. We all have no problem with the project as long as it is placed underground thru our location. If you have any questions or need anything else from us please let me know. Thank you for your time and considerations on this project. We really need your help to make this go underground.

B25-1

B25-2

Sincerely
Tom Eifler and the citizens of Norco

[REDACTED]



CITY OF NORCO

CITY HALL • 2870 CLARK AVENUE • NORCO CA 92860 • (951) 735-3900 • www.norco.ca.us •



July 19, 2018

Mr. Robert Peterson
Circle City Project
c/o Matthew Fagundes, Environmental Science Associates
1425 N. McDowell Blvd, Suite 200
Petaluma, California 94954

Subject: Opposition to the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

Dear Mr. Peterson:

On June 20, 2018, the City Council of the City of Norco unanimously voted to oppose the Circle City Project. The City Council's opposition to the project is based on the negative impacts the project will have on the City of Norco and its residents and visitors as currently proposed.

Replacement of the existing power poles with larger poles through the City of Norco, with the capacity of more overhead transmission lines, is aesthetically unacceptable to the residents of Norco because of the negative impact on property values. The transmission lines are disruptive to scenic views and the visual character of the rural, animal-keeping, open space lifestyle of Horsetown USA. This project will substantially degrade the quality of the neighborhood and its surroundings.

Based on the City Council's review of the project as well as public comments received, the Council has strong concerns about the health and safety of residents and animals in that area resulting from the proposed higher voltage transmission lines. The City Council firmly believes these negative impacts can be mitigated by undergrounding the transmission lines.

The Norco City Council hopes that you will consider these concerns in your final project proposals and decisions.

Sincerely,

Ted Hoffman, Mayor
City of Norco

cc: Norco City Council Members
Norco City Manager

Attachment: Petition by the Citizens and Homeowners of Santa Anita Road, Norco, CA

CITY COUNCIL

TED HOFFMAN
Mayor

ROBIN GRUNDMEYER
Mayor Pro Tem

KEVIN BASH
Council Member
3.3-59

BERWIN HANNA
Council Member

GREG NEWTON
Council Member

B25-3

Petition Pertaining to;

Edison’s Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007)

SCH No. 2016021012

The following petition is in regards to the Edison’s Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, precisely the 4/10ths of a mile leg along River Road in the city of Norco between 2nd street and Corydon. The proposed plan by Edison is to replace the existing power poles with larger metal poles and to add twice as many transmission lines.

B25-4

We the undersigned are not petitioning against the project that is being proposed by Edison but we are petitioning against the design of the project. This petition is more like a list of demands and is written in regards to protect and express the concerns of the 25 homes and the property owners that are located along the River Road leg and are directly involved with the poles and lines running thru our properties. Our concerns and worries are that this design will leave us with many negative impacts to our properties without giving us any positive benefits. The existing poles and power lines are already having a negative impact on our property values. The last 3 homes that sold with the power lines running thru their properties ended up taking much longer to sell and sold for a lot less then the comparable homes in the area without any poles and lines in the yard. The larger poles and higher voltage lines will have even a bigger negative impact on our property values. The safety issues also increase tremendously with the risk of down power lines and/or poles from natural disasters. There is also an underground high-pressure gas line running along the same path that raises concerns if it was to ever fail due to a natural disaster or other causes that if it ever came in contact with a power pole arc it would be catastrophic like in Porter Ranch and San Francisco. There are health concerns like cancers, tumors, migraines and more, involved from the EMF’s (Electromagnetic Field) being increased by over 100%. The noise level (humming and crackling) from the existing lines are already unbearable at times depending on the weather and/or amount of power going thru the lines. The EMF’s also have a negative effect on our electronics like our WIFI’s, dish tv, ham radio’s and wireless devices. There will be a negative impact on the aesthetics of our properties also, plus there will be privacy issues with the repairs and regular maintenance cleaning (water jetting) of the contacts. Many of us have livestock under or near these lines that become very stressed whenever there is maintenance or repairs being done to these lines. Another concern is that the new poles will be able to handle even more power lines in the future than what is being proposed to us now.

B25-5

B25-6

B25-7

B25-8

B25-9

B25-10

B25-11

We the undersigned feel as though there is a very simple solution to address the concerns listed above and a solution that will benefit both Edison and the homeowners. The solution will be to place any and all new lines and all of the existing lines underground thru this 4/10's of a mile stretch of River Road. The CPUC explained to us that all of the existing lower level power lines and the telecommunication lines will be placed underground per Edison's proposal. That means for at least this section of the project they will be digging a trench for the conduit for all of the smaller lines. With that being said the cost difference of adding more conduit in the same trench verses the cost of larger poles should offset any additional costs. The trench will already be dug and that is probably one of the largest cost. If Edison plans it correctly they can even add large enough or an extra conduit for any future upgrades that may be needed so as to avoid any future impact reports and/or protest.

B25-12

B25-13

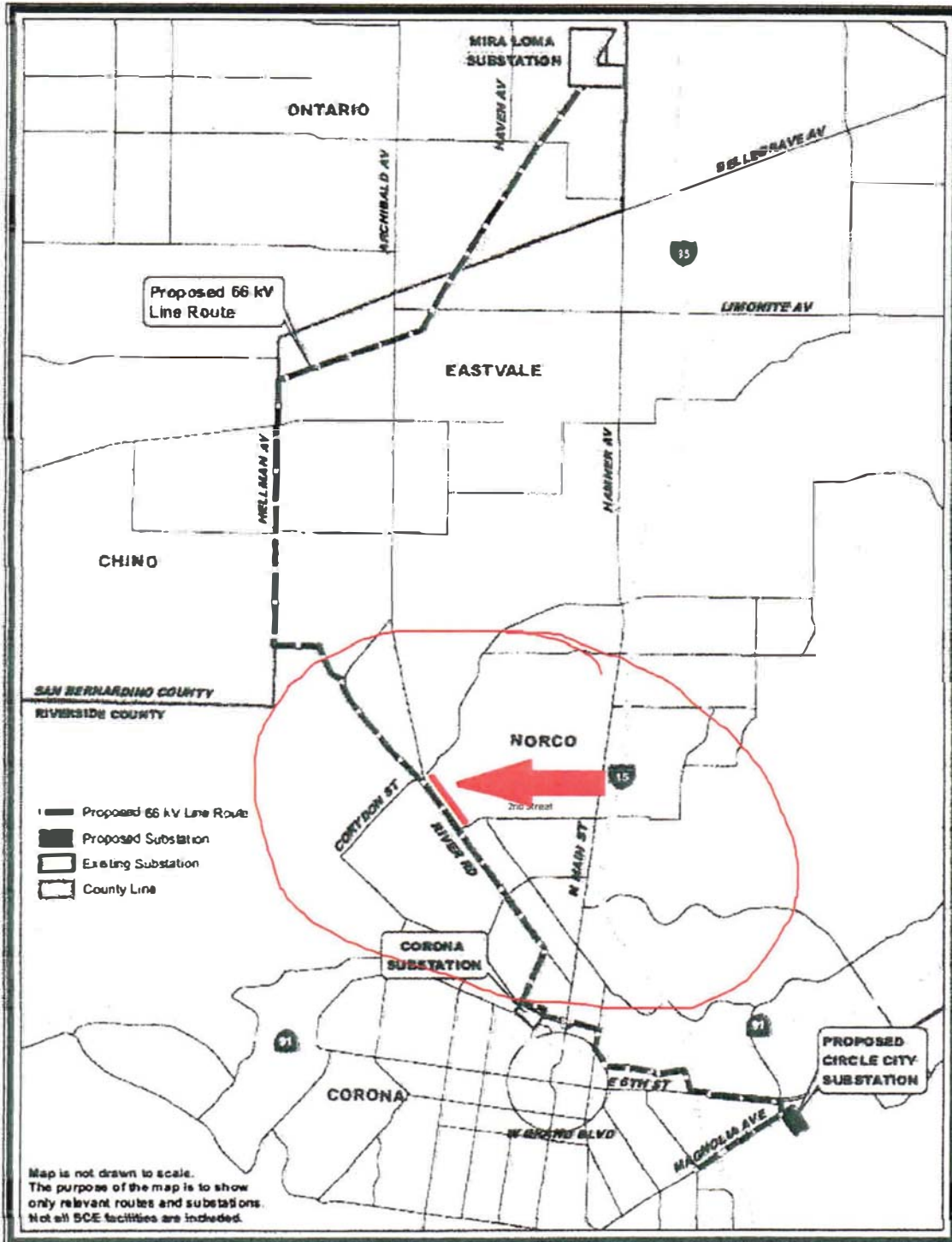
Edison's commercial's and public relations department is always boasting about how proud they are to serve and improve the communities they are a part of. We believe it is time for them to prove it to us by altering their plans to include our demands. We think it would be nice for a change that when the name Edison is mentioned they hear positive words and see smiles from their customers instead of hearing negative things and seeing frowns. Just because they have an easement does not mean they should abuse it.

B25-14

Sincerely

The citizens and homeowners of Santa Anita Rd. Norco, CA.

Figure 1

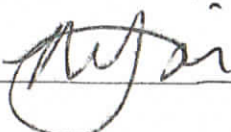
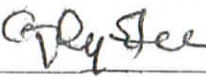

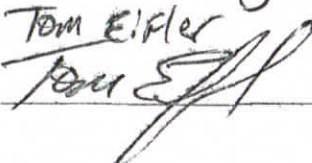
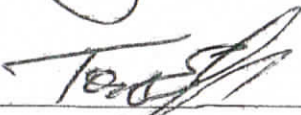

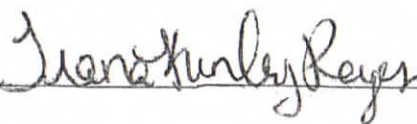

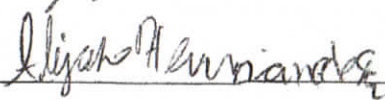


Source: Based on Southern California Edison, 2015. Application of Southern California Edison Company (U 338-E) for a Permit to Construct Electrical Facilities with Voltages between 50 kV and 200 kV: Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project. December 4, 2015.

Petition Pertaining to;

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007) SCH No. 2016021012

Signatures of Property owners and resident's proposal and demands to place all new and all existing power lines underground.

Name (print)	Address	Sign	Date
NICOLE JIRSA	2242 Santa Anita Rd		7/10/18
GORDY & SUSIE	2272 SANTA ANITA RD.		7/10/18
Todd Longbrak	2279 Santa Anita RD		7/10/2018
Tom Eifler 	2190 SANTA ANITA RD		7/10/18
JERRY FURES	2212 SANTA ANITA RD		7/10/18
Tiana Kinley Reyes	2384 Santa Anita Rd.		7/11/18
Francisco Reyes	2384 Santa Anita Rd		7/11/18
Aliyah Hernandez	2394 Santa Anita Rd		7/11/18

951-751-4090

Petition Pertaining to;

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007) SCH No. 2016021012

Signatures of Property owners and resident's proposal and demands to place all new and all existing power lines underground.

<u>Name (print)</u>	<u>Address</u>	<u>Sign</u>	<u>Date</u>
Lisa Boschma	2211 Santa Anita Rd, Norco CA	<i>[Signature]</i>	7-12-18
Shane Porter	2161 Santa Anita Norco Ca	<i>[Signature]</i>	7-12-18
Andy Diaz	2102 Santa Anita Rd Norco CA	<i>[Signature]</i>	7/12/18
Sheila Schulte	2107 SANTA ANITA RD NORCO CA	<i>[Signature]</i>	
ROBERT PEAK	2110 SANTA ANITA RD NORCO CA	<i>[Signature]</i>	
Robert Fletcher	2239 Santa Anita Rd Norco, CA 92860	<i>[Signature]</i>	
Edgar Rodriguez	2191 Santa Anita Rd Norco CA	<i>[Signature]</i>	
Angla Halford	2171 Santa Anita Rd Norco Ca	<i>[Signature]</i>	

Petition Pertaining to;

Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007) SCH No. 2016021012

Signatures of Property owners and resident's proposal and demands to place all new and all existing power lines underground.

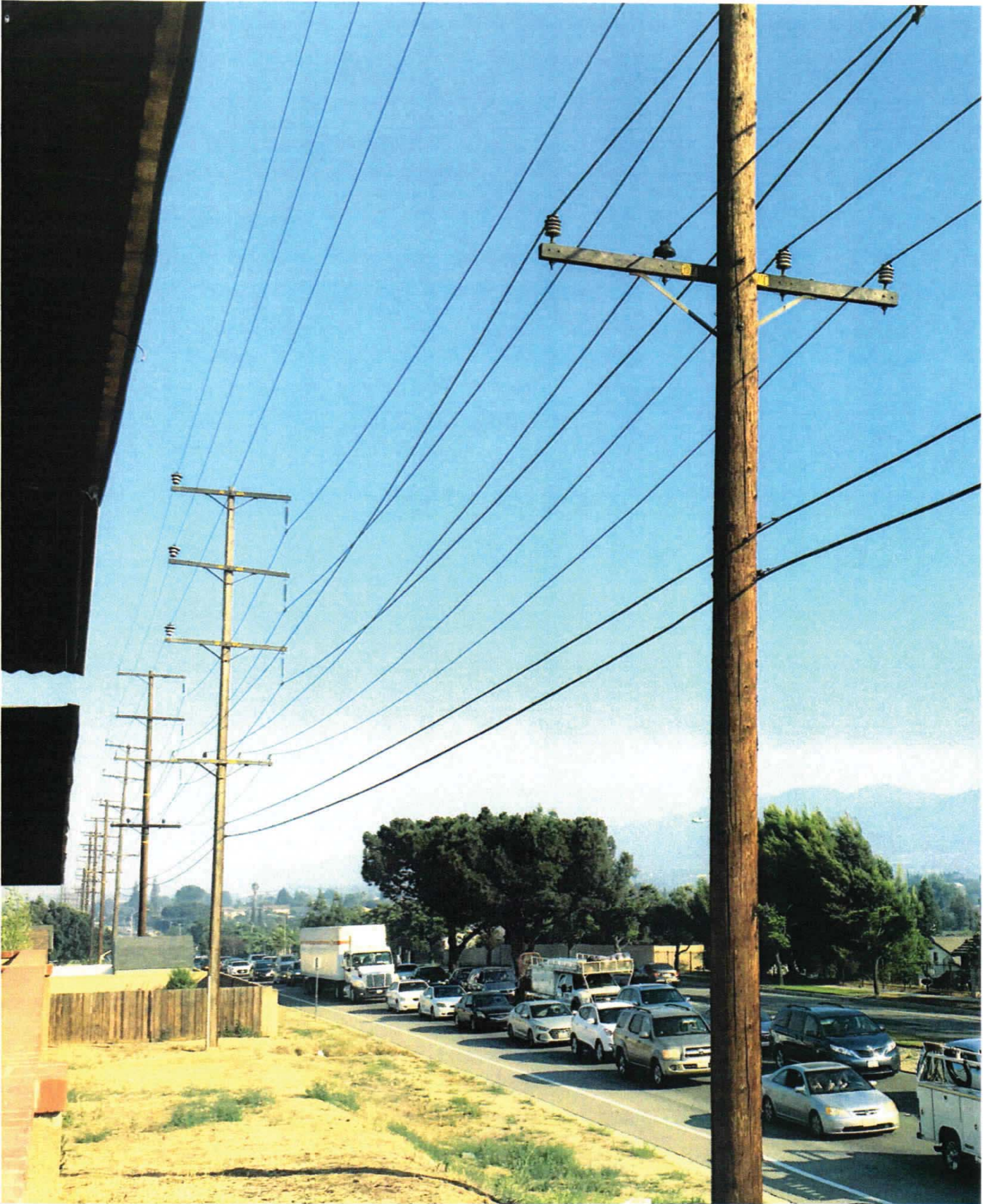
<u>Name (print)</u>	<u>Address</u>	<u>Sign</u>	<u>Date</u>
MARK ADLER	Nonco CA 92860 2130 SANTA ANITA	Mark Adler	7-14-18
JACK SHERRY VANDEMAN	2120 SANTA ANITA		7-14-18
Maria Espinoza	2131 Santa Anita Rd		9-14-18
JIM & PATT POLLARD	2180 SANTA ANITA RD.	Jim & Patt Pollard	7-16-18
Mary Pat Bokht	2160 Santa Anita Rd.		7-16-18
James Alderson	2170 Santa Anita Rd.		7-16-18
SAYEH + ESMO KOETSIER	2262 SANTA ANITA RD.		7/16/18
RICHARD MORBOE	2282 SANTA ANITA RD		7/16/18

Petition Pertaining to;

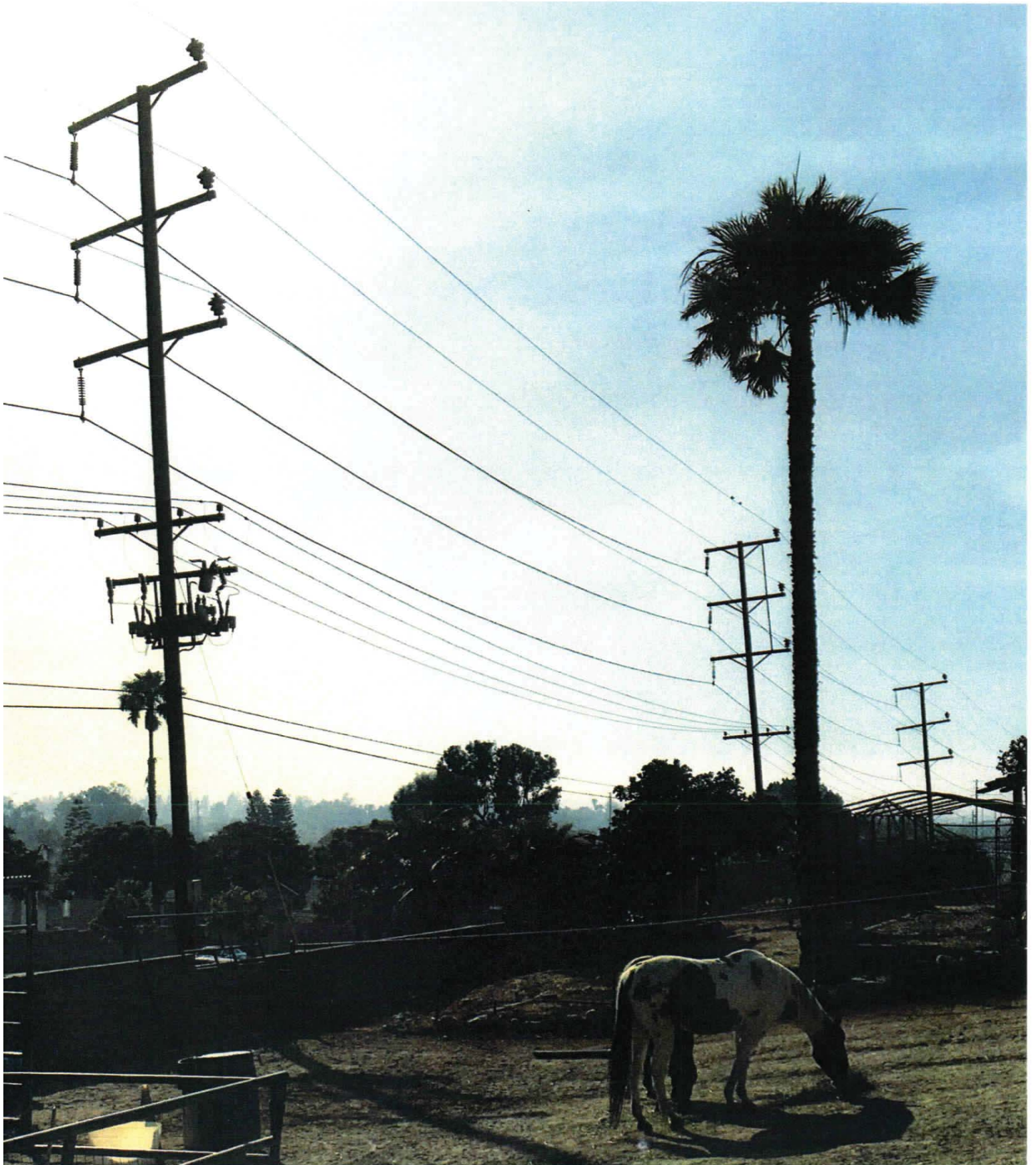
Edison's Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (A.15-12-007) SCH No. 2016021012

Signatures of Property owners and resident's proposal and demands to place all new and all existing power lines underground.

Name (print)	Address	Sign	Date
Cesar Valdez	2354 Santa Anita Rd Norco CA	<i>Cesar Valdez</i>	7-16-2018
Stephen Boone	2344 Santa Anita Rd, Norco, CA	<i>Step D. Boone</i>	7-16-2018
Tim HAGEN	2140 SANTA ANITA RD Norco, CA	<i>Tim Hagen</i>	7-16-2018
Troy Hall	2364 SANTA ANITA RD	<i>Troy Hall</i>	7-17-18
ANDY SANTO'S	2334 Santa Anita	<i>Andy Santo</i>	7/17/2018
Kathy Wilson	2249 Santa Anita Rd	<i>Kathy Wilson</i>	7-17-18
Kim Kuhn	2269 Santa Anita Rd	<i>Kim Kuhn</i>	7-17-18



RIVER ROAD ^{3.3-67} JUNE 2018



3.3.25 Letter B25 – Responses to Comments from Tom Eifler and Citizens of Norco Petition

- B25-1 The comment introduces the attached petition with 31 signers pertaining to the Project and the City of Norco comment letter and that the originals are in the mail. Comment noted. See responses to B25-3 through B25-14.
- B25-2 The comment requests that the power lines be placed underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.
- B25-3 For responses to the City of Norco letter, refer to responses to Comments A13-1 through A13-5.
- B25-4 The comment is an introductory statement that describes the Project and the location of the focus of the petition. Comment noted.
- B25-5 The comment describes the petition as a list of demands to protect and express concerns of homes and property owners along the River Road segment of the Project. Comment noted.
- B25-6 For discussion of potential Project effects associated with economic impacts, including loss of property value, refer to Master Response 2: Non-CEQA Issues.
- B25-7 As presented in the Draft EIR hazards and hazardous materials Impact 4.9-7 discussion, subtransmission line systems are designed to withstand high winds, and it is extremely rare for higher-voltage transmission structures to blow over. If this rare event does occur, the protection system on a subtransmission line is designed to detect faults, such as arcing that would occur from debris contacting the line or if the line is severed, and shut off power flow in a fraction of a second. The proposed subtransmission line pole design would also be adequate to withstand the expected seismic loading (see geology and soils Draft EIR Impact 4.7-1 discussion). In addition, along River Road the new steel poles would replace old wood poles, and the structural integrity of the proposed new poles would be expected to be higher than the existing old poles, resulting in less of a potential for pole failure compared to baseline conditions.
- The comment also expresses concern that a failure of the natural gas pipeline along River Road due to a natural disaster or other cause could be catastrophic if it would contact a power pole arc. For discussion of the potential for Project-related arcing to cause wildfire impacts, refer to the Impact 4.9-6 and 4.9-7 discussions in Draft EIR Section 4.9, *Hazards and Hazardous Materials*. Furthermore, as noted above, the proposed subtransmission lines would be on taller poles and therefore the lines would be moved further away from the existing pipelines in comparison to existing conditions.
- B25-8 The commenter notes health concerns and effects on electronics caused by electric and magnetic fields. For discussion of how electric and magnetic fields (EMF) are addressed

in this EIR, refer to Master Response 2: Non-CEQA Issues. For discussion of power line interference caused by electronics, refer to response to Comment B3-2.

B25-9 The comment states that there would be a negative impact on aesthetics. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*. Regarding privacy issues, it is acknowledged that insulators could require periodic washing with water to prevent the buildup of contaminants (dust, salts, droppings, smog, condensation, etc.) and reduce the possibility of electrical arcing, which can result in circuit outages and potential fire. The privacy concerns that would be associated with workers performing these maintenance activities are noted.

B25-10 It is acknowledged that livestock and pets may become stressed during maintenance activities that would be conducted on the proposed subtransmission line, but the comment does not address the adequacy or accuracy of the Draft EIR.

B25-11 The proposed new poles along River Road would not be designed to accommodate additional power lines in the future. In fact, as described in the last paragraph of Draft EIR project description Section 2.5.2.4, *Mira Loma-Jefferson 66 kV Subtransmission Line*, the existing 33 kV distribution line would be converted to underground along River Road between Corydon Avenue and North Cota Street to accommodate the proposed subtransmission line. There would be no room to add additional power lines to the proposed poles in the future.

B25-12 The comment indicates that a solution to the issues described in Comments B25-3 through B25-11 is to install the existing and proposed lines along the 0.4-mile stretch of River Road. For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

To clarify, only the 33 kV distribution line would be converted to underground as described in response to Comment B25-11, and the existing 12 kV distribution line and the telecommunications line would remain above ground on the proposed poles.

B25-13 The comment indicates that the cost of adding additional conduit to the trench in River Road to support the existing and proposed lines would be offset by not needed the larger poles for the proposed Project. For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

B25-14 The comment is a closing statement indicating that SCE should alter their plans to include the petitioner's demands. This comment is noted.

Matthew Fagundes

From: Wendy Lacambra [REDACTED]
Sent: Sunday, July 22, 2018 11:09 AM
To: CircleCityEIR
Subject: So Cal Edison Power Lunes

To whom it may concern,

I have been a resident of the City of Eastvale for 5 years and live on the east border of Hellman where you are proposing additional power lines be added. Additional power lines on the existing power poles would create an eyesore not only for the residents of Eastvale but for the residents of Chino as well. I do not understand how a company that promotes

B26-1
B26-2

“Our Commitment to Clean Energy

From healthier air to stronger communities, we believe that clean, reliable energy makes life better for all Southern California.”

B26-3

would consider a project that will have an adverse effect on the community. I have spoken to several of my neighbors and have yet to speak to one that supports your proposal. The negative health effects caused by power lines too close to homes are my greatest concern. I have children and want them to grow up in a healthy environment. There are many parents in the neighborhood that share my concerns.

There have been many construction projects on Hellman for the past several years. The road has been dug up several times and the lines could have been run underground. I work in Orange County and can't help but notice that “master planned” communities in Irvine have buried their power lines. Why should we be any different? I take pride in my community and am asking you to consider burying the power lines to “make life better for all Southern California.”

B26-4

Please feel free to contact me.

Deeply concerned,

Wendy Lacambra
14984 Franklin Ln

Eastvale, CA 92880
[REDACTED]

Sent from my iPhone

3.3.26 Letter B26 – Responses to Comments from Wendy Lacambra

- B26-1 The comment is an introductory statement that describes the location of the commenter’s property. Comment noted.
- B26-2 The commenter states that the Project would create an eyesore for the residents of Eastvale and Chino. For discussion of the visual impacts that would be associated with the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- B26-3 This comment expresses concern regarding negative health effects of the proposed power lines. Potential health and safety impacts of the proposed Project are discussed in the Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of how electric and magnetic fields (EMF) are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- B26-4 The comment requests that the power lines be placed underground. Refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

3.4 Public Meeting Oral Comment Responses

This section includes the transcripts from the public meetings with individual comments delineated, followed by responses to each comment.

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California Public Utilities Commission

Draft EIR Public Meeting

Circle City Substation and Mira Loma-Jefferson

66 kV Subtransmission Line Project

365 North Main Street
Corona, California 92880

June 27, 2018

6:30 p.m.

Keisha Robinson, CSR 14214

1 RUSS TITSWARTH: My first question, is a copy
2 of this presentation available.

3 ROBERT: So this will be made available on our
4 project website. We have two slides towards the end
5 with that address. We probably have some handouts with
6 the project URL.

7 RUSS TITSWARTH: Are the documents referenced
8 on this sheet available for our review?

9 ROBERT: Yes. So the graph environmental
10 report is already posted, and when the final is
11 prepared, it will also be posted so you can download it
12 in an electronic format. The draft that you want to
13 comment on within this comment period by July 20th is
14 already in there.

15 (Discussion off the record.)

16 RUSS TITSWARTH: Quick question, you said there
17 are two components. I didn't catch what the first one
18 was; a data component, before that you said something
19 else?

20 MATT: I believe I was mentioning the source
21 lines?

22 RUSS TITSWARTH: Yes.

23 MATT: Two sets of source lines. Two sets of
24 source lines, that's two circuits on one set of pole.

25 RUSS TITSWARTH: Two different types of source

1 lines.

2 MATT: Coming from different directions.

3 RUSS TITSWARTH: I got it now.

4 (Discussion off the record.)

5 RUSS TITSWARTH: Are these the total
6 environmental criteria that you evaluated in your
7 studies? Are there any others?

8 MATT: Right, these 18 right here, correct.

9 RUSS TITSWARTH: Are they here in the
10 presentation or are they on the website somewhere?

11 MIKE: They are on the website in the document.
12 There is an 18 CEQA issue areas.

13 RUSS TITSWARTH: CEQA?

14 MIKE: So CEQA is California Environmental
15 Quality Act Law has an appendix guidelines which list 18
16 areas that need to be considered when analyzing
17 environmental impacts. Those are the 18 areas that
18 we're giving you.

19 RUSS TITSWARTH: And those will be referenced
20 in the document?

21 MATT: Yes.

22 ROBERT: Do you want to see that slide again to
23 see the area?

24 RUSS TITSWARTH: No, I'm okay.

25 (Discussion off the record.)

1 RUSS TITSWARTH: Just clarification, I don't
2 understand all of your terminology, is there a
3 difference between the word "underground" and
4 "subtransmission" in this context?

5 MATT: Subtransmission could be overhead or
6 underground -- either on poles or underground.

7 MIKE: The term subtransmission relates to the
8 voltage. Edison defines transmission as, I think, 230
9 kilovolts and higher. Subtransmission is between about
10 50 and 230. When we say "subtransmission," we are just
11 talking about 66 kilovolt transmission line.

12 MATT: And distribution is the lower 12 kV.

13 RUSS TITSWARTH: When you say
14 "subtransmission," you are not specifying whether it is
15 above ground or underground at all? When you say
16 "underground," you're specifying it's underground?

17 MIKE: Correct. We will either say "overhead"
18 and "underground" to make that distinction.

19 (Discussion off the record.)

20 RUSS TITSWARTH: Quick question, the
21 availability, is that going to be mailed to all of the
22 affected residents?

23 MATT: It's mailed within 2- or 300 feet of the
24 line -- the proposed line.

25 RUSS TITSWARTH: Is there a possibility to get

1 a replacement. I don't recall I've received it.

2 MIKE: We have copies right in the back.

3 (Discussion off the record.)

4 RUSS TITSWARTH: Just to clarify, that URL that
5 I can't read, is that on a piece of paper?

6 MATT: It is.

7 Okay. We are ready to receive your comments,
8 and there is just a few guidelines that are pretty easy
9 to adhere. I don't think we are going to have any --

10 MIKE: Can I say something really quick? There
11 were speaker cards available when you came in. If you
12 like to speak, all we ask is that you give us those
13 speaker cards with your names on them.

14 We have a court reporter here to record the
15 comments so that we can translate them into written
16 comments for the conclusion in the final EIR.

17 I know there was -- we did consider a lot of
18 alternatives for this project. I totally understand
19 that it's not really easy to get at a snapshot, so I
20 encourage you to look at the boards and ask questions
21 after.

22 This phase of the meeting right now. We really
23 want to hear from you. We want to hear what your
24 concerns are, what your interests are related to the
25 project so that we can factor that into the preparation

1 of the final EIR. So that information is available to
2 the commission and the ALJ when they are making a
3 proposed decision and voting on the decision.

4 So if anybody needs a speaker card, if you want
5 to hold your hand up so we can pass them out; or if you
6 have one filled out, we will collect them. We have time
7 today because we have the room until 8:00 o'clock. So
8 if you would like to come up, we have the cards.

9 What I will do is, I will read off the name of
10 the speaker, and I will let you know who the next person
11 is, and Keisha is here to record your comments.

12 So the first card we have here is Tom Rifler
13 and then Richard Monroe is the next one. If you want to
14 come up, there is a microphone here for you to use.

15 TOM RIFLER: I understand progress. Edison
16 provides the air conditioning, lighting and all of that.
17 I do understand progress. I think the simple solution,
18 which is very improbable, is just stop building homes,
19 but that's improbable. That's just not going to happen.

20 I think the battery idea is a very short term
21 solution because the more and more houses are coming in
22 so they're getting more and more power and batteries
23 only provide so much power source.

24 What I am upset about is how the homes that are
25 directly impacted -- which I am one of them, the

C1-1
C1-2
C1-3

1 lines -- the poles are in my background, the lines are
 2 going right over my property. I am real upset on how I
 3 got notified. I got an occupant letter. If it's from
 4 California, Edison, whatever. I don't know about the
 5 rest of you but I throw those in the trash because it's
 6 solicitation as far as I am concerned.

7 I think the proper way to handle this, as far
 8 as notification, would have been certified letters to
 9 the property owners. Because on my street, several of
 10 the homes are rentals. So now, the renter gets it, they
 11 just think it's garbage, throw it in the trash. The
 12 home owner might be living in Idaho, and they don't know
 13 anything about their property value being impacted this,
 14 so I think that was a big mistake.

15 As far as the environmental impact reports go,
 16 sure, they are not going to kill off some sort of
 17 species; I get all of that. But there was no property
 18 value impact report done. There was no health impact
 19 report done that was provided to us home owners, and
 20 there was no aesthetic report done. Those are very
 21 important things to home owners like myself.

22 Right now, certain days, depending on weather
 23 or how much power are going through these lines, you are
 24 going to hear them humming. I don't know -- it sounds
 25 to me that they are going to be increasing at least a



C1-3
cont.

C1-4

C1-5

C1-6

1 hundred percent on the power that going to go above my
2 house. When I bought this house in 2000, I dealt with
3 the lines that were there. I accepted that.

↑
C1-6
cont.

4 But now there is more lines in the 18 years I
5 have been there. There are more lines that have been
6 added, more -- I don't know -- transformers or whatever
7 that have been added. So now, I am concerned about my
8 health risks -- for me, my families, my animals --
9 because of all of the EMFs that are going to be
10 bombarding us with now.

↑
C1-7
↑
C1-8

11 And then the noise level -- you talked about
12 the noise possibility, but you didn't talk about the
13 constant humming and buzzing that will give people
14 migraines and tumors and cancer and all of that stuff.

15 I understand progress. I just truly believe
16 that for aesthetic reasons, health reasons, make
17 everybody happy reasons; people -- I don't know this
18 whole line. I am being incentive to everybody else, but
19 I am looking at my four tenths of a mile, 25 homes that
20 I live that is being impacted on. I just feel that to
21 make everybody happy, none of these 25 homes that I know
22 of are going to benefit from this project. In fact, we
23 are going to get even worse off as far as the aesthetics
24 and everything else I mentioned before.

↑
C1-9
↑
C1-10

25 I just believe that if you are going to do this

1 project, somebody is benefitting at the other end. It's
 2 not us, so why not wherever there is a home that is
 3 actually impacted by this project, whether it's poles in
 4 their backyard or lines going over their property, I
 5 believe those areas should be put underground. I am
 6 happy with that. I am not here to fight Edison. I like
 7 my air conditioner when I use it. I like my lights on
 8 at night. I don't like rolling blackouts.

9 But I think to benefit us, to compromise -- I
 10 believe in compromises, and I think putting the existing
 11 lines and the new power lines underground where it
 12 impacts these homes, I mean directly, is fair. I think
 13 that's the only fair thing you guys can do. Somebody at
 14 the other end wants this power; add it into the project.
 15 I don't know how much that costs. I was told million
 16 dollars a mile. I don't know how accurate that is. As
 17 far as I am concerned, my area, it's four tenths of a
 18 mile. I don't know how many more houses are affected
 19 that way.

20 I would be very happy with the compromise of
 21 taking the existing lines, put them underground with the
 22 new lines, take the poles out, and it will help us
 23 aesthetically. It will help us health-wise. It will
 24 help us with noise, and everything else that is involved
 25 with this project. That is really -- I think that will



C1-10
cont.

1 make a lot of people satisfied.

2 You have to factor in future law suits. I said
3 it one of our counsel meetings in Norco. Good money is
4 thrown away on lawyers and courts. So how many court
5 cases are there going to be with health issues down the
6 road. I think that's going to be the worst one.

7 Property values, my property values are going to go up
8 because bigger poles and more -- I know there is less
9 lines, but there is more power. There is going to be
10 bigger pole. It's not going to help my property value
11 any. It's definitely not helping my view any and it's
12 definitely not helping my wife's migraines any.

13 I just think Edison is a big company, they can
14 afford to eat the cost of putting it underground, and
15 that's all I really have to say.

16 MIKE: Thank you very much. So the next person
17 is Richard Monroe, and after that is Jim Pollard.

18 RICHARD MONROE: Good evening. Thank you for
19 the opportunity to speak. I come from a unique
20 perspective of this issue because during my life of
21 employment, I was a communication consultant for Duke,
22 Virginia Electric Power, Florida Electric Power, and
23 some other places.

24 My background as a FCC licensed person with the
25 capability of maintaining international and broadcast

↑ C1-10
| cont.
|
| C1-11
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| C1-12
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| C1-13
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| C1-14
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1 communications and my hobby is amateur radio. And in
 2 amateur radio and officer of the Corona Norco Club, we
 3 strive to be available and provide urgency
 4 communications. The biggest one that I remember is the
 5 Good Friday earthquake in Alaska where I spent three,
 6 four days of handling teletype traffic from my own
 7 personal location to support health and welfare --
 8 people looking for people, people on the other end
 9 looking to get the message out.

C1-14
cont.

10 I registered with the Utility
 11 Telecommunications Counsel because my activities and
 12 proximity to the lines and the back of my yard. My
 13 background line is River Road at 2282 Santa Anita. The
 14 present distribution lines that are there, I've been
 15 told, only the 33 kV line, the lower voltage one is
 16 active. The others are inactive according to the
 17 information that I was given.

18 Since those lines create an interesting
 19 situation to me, I am extremely worried about what the
 20 future brings.

21 Number one, the 33 kV lines permit me to use my
 22 radios approximately five days either side of a
 23 rainstorm. The rest of the time, the noise level from
 24 those insulators and that 33 kV line, varies signals
 25 from around the world to the point that it's quite

C1-15

1 unable to operate and quite annoying.

2 The other thing was that when channel 2, 3 --
3 3 was in Santa Barbara -- 2, 4, and 5 disappeared from
4 my antenna on the roof because of the white spots and
5 unlocking of my receiver because my antenna is pointed
6 right through those lines on Willson. I had to buy an
7 alternative. Direct TV costs me a hundred bucks a
8 months just to be able -- so my wife could watch
9 television comfortably.

10 The noise is a real problem, and underground it
11 disappears, of course. I would support -- with my
12 background, everything he said makes sense here. It's
13 going to come. It's just a matter of -- excuse me. I
14 am monitoring earthquakes out in Hawaii. It's going to
15 come. We are going to end up with what they need to
16 provide a service. And in that vein, I don't dispute
17 anything that they have to do. I do realize that there
18 are some alteratives that are to our benefit.

19 You mentioned noise, ionizing radiation. Power
20 lines don't provide ionizing radiation. There is no
21 health hazard related to power lines except noise. And
22 I can go out in my background and I can listen to those
23 power lines talking in the middle of the afternoon on a
24 hot dry day.

25 But exposure, I lived in Washington for three

↑ C1-15
| cont.

C1-16

C1-17

C1-18
↓

1 years underneath a million volt Bonneville power line,
 2 kids stood under it in the morning for the school bus,
 3 and you could walk out with a four-foot fluorescent tube
 4 in your hand and hold it up and light it, standing there
 5 from the arcing from those million volt lines. I don't
 6 think that at 80 years of age I am showing any of those
 7 problems that might have occurred from physical -- maybe
 8 mental but not physical.

C1-18
cont.

9 The other line going off the insulator is
 10 extremely aggravating. The construction of that line
 11 down, specifically River Road, has a second impact.
 12 Those of you that remember an incident that occurred up
 13 in the Bay Area a few years ago where a gas line -- and
 14 I am sure SCE realizes that there is a
 15 900-pound-high-pressure gas line within the right-of-way
 16 that you own on the back of my property.

C1-19

17 Construction bothers me because I have lived in
 18 (inaudible) season where the major communication
 19 facilities were taken out because someone was digging a
 20 trench. Second thing that bothers me is a hundred-foot
 21 tower when my back door is 100 feet from that line. We
 22 have an earthquake, I may have a 66-foot kV liner
 23 sitting in my back door or electrifying the fence along
 24 my property.

C1-20

25 All of this says to me is that it's going to

1 happen. Let it happen in a way that improves our
 2 quality of life here in Norco. Do it underground. It's
 3 going to cost money. We pay for those things all of the
 4 time with our bill, spread it out, but do it. Take it
 5 underground. We don't need this in the air anymore.
 6 And with that, thank you for your time.

C1-21

7 MIKE: Thank you very much. So Jim Pollard is
 8 next, and then Karen Spiegall. And then if anybody else
 9 would still like to speak, we still have more speaker
 10 cards. You are welcome to come up.

11 JIM POLLARD: Good evening. My name is Jim
 12 Pollard, and I live on Santa Anita with my backyard
 13 going up to River Road, which this project is key to.

C1-22

14 I am not against the project to continue, but I
 15 do have some issues and a lot of them have already been
 16 mentioned. When I moved there in the '70s, River Road
 17 was a two-lane road, and I was told then that when River
 18 Road got widened that Edison had plans to put those
 19 lines underground. That hasn't happened. We had fewer
 20 lines at that time and over the years more lines have
 21 been added and equipment put on the poles.

C1-23

22 Let's see, I am trying to cut it down because
 23 some of the things have already been said.

C1-24

24 I am concerned about the pole heights -- the
 25 new pole heights that are going to be installed, if

1 that's the way they are going to go, and pole locations
 2 on the right-away easement. I am concerned about health
 3 issues and the noise impact that we already have; that's
 4 going to increase, and did I mention my property value.
 5 If somebody comes to look at my house with my backyard,
 6 my views of the Santa Ana Canyon and the sunsets in
 7 Norco, those lines, even though they are higher and they
 8 say, I believe -- is it only six lines?

↑ C1-24
cont.

C1-25

9 MIKE: Yeah, in some of the areas that it's
 10 going from. A single circuit is kind of a standard pole
 11 with three lines on it. Generally, if it's a single
 12 circuit, there is two lines on one side and one on the
 13 other. When they take those down and put up the double
 14 circuit, it ends up with kind of three lines of each
 15 side, so a total of six lines.

C1-26

16 JIM POLLARD: So this project, they tell us
 17 that it's good until 2026. That's no guarantee that
 18 those six lines will stay those those six lines, I don't
 19 believe. And now with communication and doing away with
 20 some of the -- senior moment here.

C1-27

21 Anyway, Edison can put other equipment from
 22 other companies on their poles for transmission of
 23 cellphone distribution. How much of this pole is going
 24 to be littered with other objects over the years. I
 25 don't feel that anybody is giving us a guarantee on

1 that. I would like to see it underground between Second
 2 and the Santa Ana River. I am not against that part.
 3 And nobody has told us about pole locations or how many
 4 poles will be added or replaced; and the biggest thing,
 5 I think is our property values all along Corona and
 6 Norco will be severely affected. Thank you.

C1-28

C1-29

7 MIKE: Thank you. Karen Spiegal.

8 KAREN SPIEGAL: Seems that all of us that are
 9 speaking have the same purpose. Two years ago I
 10 addressed -- the audience that was here two years ago --
 11 the same issues.

12 More importantly, I had to addressed the fact
 13 that we in Corona -- I am the Mayor of Corona. We asked
 14 that we participate. There is so much overhead in
 15 industrial areas and then the -- no, the underground is
 16 in the industrial areas, and the overhead is communities
 17 where the houses are. And there is a way where we could
 18 work together to make it where it's more efficient and
 19 that our residents aren't as affected as the businesses,
 20 which is more aesthetically acceptable.

C1-30

21 And we didn't -- we went through some of the
 22 areas that have lines that would be going through
 23 people's yard, like your background. We went to the
 24 point where it was even on the news, if anybody
 25 remembers back a couple years ago. We were fighting

1 just to communicate, just talk to us, and I never once
 2 received a phone call on that issue. I've had some on
 3 many other things, but on that particular issue. It's a
 4 discussion. I think it's really important that they
 5 involve the local cities, that we can help work through
 6 some of these so we wouldn't have gotten to this point.

↑
 C1-30
 cont.

7 I'm just really frustrated, and I really
 8 believe that there is a better way of the underground
 9 and overhead. It's a cost factor and I understand that,
 10 but we can be more efficient and work together so that
 11 we have the areas that should be underground addressed,
 12 as well as those that could be overhead could be more
 13 acceptable. That's it.

↑
 C1-31

14 MIKE: Thank you very much.

15 Robert, did you have anything that you wanted
 16 to say in closing?

17 First, let me ask is there anybody else that
 18 would like to make a comment? Like I said, we really do
 19 encourage you to submit those written comments. You
 20 don't have to use that form. You can write a letter,
 21 send an e-mail. It all goes into the same record and
 22 will get factored into the final EIR.

23 JIM POLLARD: The verbal comments that we gave
 24 right now, are they going to be presented too?

↑
 C1-32

25 MIKE: Yes. We're having the -- the transcript

1 with the comments will be included in the final EIR, so
2 they will show up in the final documents.

3 JIM POLLARD: And those are given to the final
4 commissioners to be read?

C1-33

5 MIKE: Yes, it will all be part of that final
6 EIR document.

7 JIM POLLARD: And then when might they have the
8 report complete on the results on this?

C1-34

9 MIKE: What's the schedule?

10 MATT: It's fall of this year.

11 ROBERT: That's for the environmental document.
12 A proceeding will take place after that, so probably,
13 well into next year before we have a determination on
14 this project.

15 JIM POLLARD: So maybe the project wouldn't
16 start until '19 or '20?

C1-35

17 MIKE: I can't remember what the construction's
18 proposed schedule was -- '20 or '21.

19 ROBERT: It is hard to predict how long the
20 proceeding and judge will take.

21 JIM POLLARD: Your report shows it is only good
22 until 2026. That's only three or four years and then
23 everything is going to be outdated at that time.

C1-36

24 MIKE: Well, I was going to clarify that. When
25 we are talking about the forecast period of the

1 document, that's just -- so Southern California Edison
2 provides a forecast -- a ten-year forecast, and that's
3 what they use to decide which projects they need to
4 apply for to build. The forecast period does not mean
5 that that's the end of the useful life of the project.

6 It's a little -- I can totally see where you
7 are coming from. The 2026 isn't the end date. It
8 doesn't mean that they have to build something else by
9 2026 to meet the next need. It just means that's the
10 periods that they use to estimate when they might have
11 to build the project.

12 And Matt, you can talk a little bit more about
13 that after if you would like.

14 Well, if there is no more comments, we would
15 like to end the public comment portion of the meeting,
16 and we will be here standing by the posters. We will be
17 happy to walk you through the different alternatives,
18 the different parts of the projects.

19 Thank you very much. We are really glad that
20 you are here to participate. Your comments really are
21 important to us.

22 (The EIR Pubic Meeting concluded at 8:00 p.m.)

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REPORTER'S CERTIFICATION

I, Keisha Robinson, a Certified Shorthand Reporter
in and for the State of California, do hereby certify:

That the foregoing witness was by me duly sworn;
that the deposition was then taken before me at the time
and place herein set forth; that the testimony and
proceedings were reported stenographically by me and
later transcribed into typewriting under my direction;
that the foregoing is a true record of the testimony and
proceedings taken at that time.

IN WITNESS WHEREOF, I have subscribed my name this
10th day of July, 2018.



Keisha Robinson, CSR No. 14214

3.4.1 C1 – Responses to Oral Comments from June 27, 2018, Public Meeting

- C1-1 Comment noted. This comment does not address environmental issues, and is therefore outside the scope of CEQA. No further response is required.
- C1-2 Comment noted. As stated at the end of the first paragraph of Draft EIR alternatives Section 3.4.4.1, *Alternative D1: 12 kV Distribution-Level Battery Storage*, a 20 MW battery storage facility would defer the need for a substation until 2031.
- C1-3 The comment indicates that the Draft EIR notices were improperly handled because they were “occupant” letters. To clarify, the Notice of Availability (NOA) of the Draft EIR was sent via First-Class Mail by the U.S. Postal Service to owners of properties within 300 feet of the proposed Project alignments and sites. As shown in Draft EIR Appendix B, *Mailing List and Certificate of Service*, several of the notices were sent to property owners outside of California.
- C1-4 For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. The commenter’s concerns about the economic effects of the Project are outside the scope of CEQA.
- C1-5 Comment noted. For the health risk assessment conducted for the Project, refer to Draft EIR Appendix D.2, *Health Risk Assessment*. For the public health impacts that would be associated with the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. The aesthetics analysis conducted for the Project is presented in Draft EIR Section 4.1, *Aesthetics*. The NOA provided to property owners contained information on how to download an electronic copy of the Draft EIR and where hard copies of the document are available for review.
- C1-6 For discussion of impacts that would be associated with humming of the subtransmission lines, known as corona discharge noise, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1.
- C1-7 The comment expresses concern about the health effects of Project-related electric and magnetic fields (EMF). For discussion of how EMF is addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- C1-8 For discussion of noise impacts that would be associated with humming and buzzing of the subtransmission lines, known as corona discharge noise, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1. For discussion of how EMF is addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- C1-9 Refer to responses to Comment C1-4 through C1-8.

- C1-10 The comment indicates that a solution to the issues described in Comments C1-4 through C1-8 is to install the existing and proposed lines underground along the 0.4-mile stretch of River Road. For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.
- C1-11 The comment does not address the accuracy or adequacy of the Draft EIR. For the health risk assessment conducted for the Project, refer to Draft EIR Appendix D.2, *Health Risk Assessment*. For the public health impacts that would be associated with the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*.
- C1-12 For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. Also, refer to response to Comment C1-11.
- C1-13 For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.
- C1-14 The comment provides a summary of the commenter's background and his hobby of amateur radio, and discusses the distribution lines along River Road behind his house, including a reference that one of the distribution lines may be inactive. To clarify, according to SCE, both the 33 kV and 12 kV distribution lines in this area are active (SCE, 2018).
- C1-15 The commenter states that the noise levels from the insulators and 33 kV line behind his home affects operation of his radios. Comment noted. Also, refer to response to Comment B3-2 for additional information about disturbance to electronics that can be caused by corona and gap discharge from power lines.
- C1-16 The commenter indicates that he had to purchase cable because his reception was affected by white spots and the lines on Wilson. Comment noted.
- C1-17 The commenter suggests that undergrounding the lines would eliminate the problems described in Comments C1-14 through C1-16. Comment noted. As disclosed in the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.12-1, corona discharge noise that would be associated with the Project would be less than significant and as discussed in response to Comment B3-2, gap discharge interference can be avoided or minimized by proper design of the subtransmission line hardware parts, use of electrical bonding where necessary, and by careful tightening of fastenings during construction. Individual sources of gap discharge noise can be readily located and corrected. Arcing on contaminated insulators can be prevented by increasing the insulation in high contamination areas and with periodic washing of insulator strings. From a CEQA perspective, there is not a sufficient reason to underground the lines for the purpose of avoiding corona and gap discharge interference because no associated significant impact has been identified.

Also, for discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

- C1-18 For discussion of electric and magnetic fields (EMF) and how they are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues.
- C1-19 The commenter appears to express concern that proposed construction activities in River Road could cause an accident associated with an existing gas line in the road. As described in Draft EIR Project description Section 2.6.7.1, *Survey*, construction activities associated with undergrounding the existing 33 kV line within River Road would begin with a survey of underground utilities to avoid damaging existing utilities.
- C1-20 Refer to response to Comment C1-19 regarding surveys that would be conducted prior to trenching to avoid utilities. Refer to response to Comment B5-4 regarding the potential for an earthquake to result in pole failure.
- C1-21 For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.
- C1-22 The comment is an introductory statement that describes the location of the commenter's property. Comment noted.
- C1-23 The commenter states that more and more lines have been added to the poles along River Road since the 1970s. Comment noted.
- C1-24 The comment expresses concern about the proposed pole heights along River Road. Comment noted, but it does not address the accuracy or adequacy of the Draft EIR.
- C1-25 The comment expresses concern regarding health issues and noise that would be associated with the proposed subtransmission line along River Road. Comment noted. For discussion of electric and magnetic fields (EMF) and how they are addressed in this EIR, refer to Master Response 2: Non-CEQA Issues. For the health risk assessment conducted for the Project, refer to Draft EIR Appendix D.2, *Health Risk Assessment*, and for the public health impact analysis conducted for the Project, refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*. For discussion of impacts that would be associated with corona discharge noise, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1.
- C1-26 For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. The commenter's concerns about the economic effects of the Project are outside the scope of CEQA.

As discussed in Draft EIR Project description Section 2.5.2.4, *Mira Loma-Jefferson 66 kV Subtransmission Line*, the same amount of wires would be attached to the proposed new poles along River Road; however, the six conductors at the top of the poles would be

66 kV (i.e., the three 33 kV conductors that would be installed underground would be replaced with three 66 kV conductors).

C1-27 The commenter expresses concern that additional equipment may be added to the poles over the years. Comment noted.

C1-28 For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

C1-29 For the approximate locations of the proposed poles along River Road, refer to Draft EIR Figures 2-19 and 2-20. For an illustration of how many light-weight steel and tubular steel poles would replace existing wood poles along River Road, refer to Draft EIR Figure 2-6.

For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. The commenter's concerns about the economic effects of the Project are outside the scope of CEQA.

C1-30 The commenter introduces herself as the Mayor of Corona and indicates that the City of Corona had previously asked to participate and work together on the Project to make it aesthetically acceptable but that did not happen.

The City of Corona has participated in the review of the Project. As stated in Section III.F.d, of SCE's Application for the Permit to Construct the Project, SCE conducted initial briefings about the Project with each member of the City Council and various members of city staff in the summer of 2009 while it was selecting its routes. Then City staff participated in SCE's March 2010 agency workshop, and SCE conducted additional briefings for the City in August 2012, after its preferred routes were selected. SCE has briefed City staff and elected officials on a regular basis, with the most recent briefing occurring in October 2015. After the CEQA environmental review began, Environmental Science Associates (ESA) conducted an agency meeting in Corona on behalf of the CPUC on February 3, 2016, with the City Manager, Community Development Director, and City Attorney, and on February 16, 2016, a City of Corona Planning Commissioner participated in the Public Scoping Meeting held for the Project (See Draft EIR Appendix A, *Scoping Report*).

C1-31 The commenter expresses frustration that more of the line would not be undergrounded. For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

C1-32 Yes, the verbal comments provided at the Draft EIR public meetings have been transcribed and are presented in this Final EIR Section 3.4, *Public Meetings Responses*.

C1-33 Yes, all comments received on the Draft EIR are included in Final EIR Chapter 3, and the Final EIR will be made available to the Commissioners for review.

- C1-34 The Final EIR is anticipated to be released in November 2018, and the ultimate decision whether or not to approve the Project or an alternative to the Project will likely occur sometime in 2019.
- C1-35 As stated in Draft EIR Section 2.6.15, *Construction Schedule*, construction of the Project is scheduled to begin during the third quarter of 2020.
- C1-36 It appears the commenter is referencing the 10-year power flow forecast. To clarify, each year SCE conducts power flow demand 10-year forecast studies for the electrical needs area (ENA), and the subtransmission lines that serve the ENA, to quantitatively estimate when the projected electrical demand is expected to exceed maximum operating limits. At the time the Draft EIR was published, the current 10-year forecast was for the period of 2017 through 2026. This does not mean the Project would be outdated after 2026. The reason the forecasts are limited to 10 years is because it would be speculative to estimate all the factors that go into the forecast beyond 10 years.

1 California Public Utilities Commission.

2 Draft EIR Public Meeting

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4
5 Circle City Substation and Mira Loma-Jefferson

6 66 kV Subtransmission Line Project

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18 13820 Schleisman Road
19 Eastvale, California 92882

20
21 June 28, 2018

22 6:30 p.m.

23
24
25 Keisha Robinson, CSR 14214

1 MATT: We're ready to hear your comments. We
2 just have a few guidelines that we ask you to follow.
3 There they are.

4 MIKE: We would like to begin with the oral
5 comments, and then we will be around afterwards to
6 answer questions by the posters and have conversations.
7 So the first speaker I have here is Todd Rigby and then
8 followed by Andrea Heve.

9 TODD RIGBY. I apologize for my kids and the
10 rowdiness of them. But at the same time, that's why I
11 am here is because I feel this is a very important
12 issue. I could have very well used that as an excuse to
13 stay at home because I didn't want to bring my rowdy
14 two-year-old that I can barely contain, but this is an
15 important issue to me and that's why I came. I wanted
16 to make sure that my concerns were shared, which leads
17 me right into a couple of my concerns.

C2-1

18 I believe -- one of my first ones is economic
19 analyst showed that the line should be underground
20 versus -- no, I'm sorry, the environmental analyst shows
21 that they should be underground. Economic obviously
22 shows that they would be above ground.

23 If we put them above ground, my concern is by
24 profession, I am in the real estate industry. Within
25 this area we do have a couple areas that have lines

C2-2

1 already and those do drastically hurt values, hurt
 2 resale. I have a listing right now that we're having a
 3 tough time selling. My most common remark on that is,
 4 you walk out the door and see power lines. If we add
 5 even more power lines, that is going to make things
 6 even a little bit more difficult with home values.
 7 That's something that we have pride within Eastvale;
 8 that we have strong-home values, that we have a great
 9 community.

C2-2
cont.

10 If this were in Orange County, I don't think we
 11 would be here. I don't think we would be discussing
 12 this. Orange County has done a great job making sure
 13 that all of their lines are underground. You don't see
 14 very many lines above ground in Orange County, and I
 15 hope that we can be treated the same way. That the CPUC
 16 listens to our community and what our community wants.

C2-3

17 And the last thing that I have is also safety.
 18 If we add more power lines, that means more power lines
 19 have the possibility of coming down. That means more
 20 poles are in the area, more accidents can happen.

C2-4

21 Once again, I was just thinking about this as
 22 my kids were just up there, trying to keep them still
 23 but they don't. They have very limited knowledge as to
 24 what is good, what is bad, what they can touch, what
 25 they can't happen. If something were to happen to one

C2-5

1 of those power lines for some reason it were to go down,
 2 that's more that we have. We have a young demographic
 3 here. We have a lot of kids, that's one more things
 4 that the kids can get in to and they can get hurt
 5 through.

↑
 C2-5
 cont.

6 So I think it just goes back to safety impacts.
 7 Safety impact of additional lines, above ground and
 8 additional poles above ground. So as you can tell, I am
 9 a strong advocate for putting them underground. That's
 10 what our community needs, and that's what our community
 11 deserves.

↑
 C2-6

12 ANDREA HEVE: I hate speaking in front of
 13 people. My name is Andrea Heve. I also believe in
 14 burying the lines. The above ground lines are not
 15 aesthetically appealing to our great city of Eastvale.
 16 Above ground lines are a blight on the community. They
 17 bring down property values. Most of the homes are
 18 already built and lived in, so to add the lines in now
 19 is not fair to the home owners.

↑
 C2-7

20 I have been here 16 years, and one of the lines
 21 they want to do is right behind my house. And I agree,
 22 if I have to look out and see those lines right there,
 23 it's going to bring down the property value of my home,
 24 and I have been here 16 years.

↑
 C2-8

25 Anywhere there are existing home, whether it is

↓
 C2-9

1 Jurupa Valley, Eastvale, Norco or Corona, it's a no for
 2 above ground lines. Burying the lines decreases any
 3 damage that can happened from the severe winds that we
 4 have in this area. Burying the lines would make it
 5 almost impossible to steal or make illegal connections
 6 or sabotage anything to do with the lines.

C2-9
cont.

C2-10

7 So no to any of the above ground lines in
 8 Eastvale from me, and I vote for Alternative A, No
 9 Project, because I don't think the options they provided
 10 were even anything that I would consider. Maybe go back
 11 to the table and come back with something else because
 12 the two options that you provided -- or that SCE
 13 provided were not any options that I would consider.

C2-11

C2-12

14 Thank you.

15 RALPH DILISIO, JR.: Good evening. My name is
 16 Ralph and my wife Cheryl. We just recently moved here
 17 about a year ago. One of the reasons we picked this
 18 area is because how nice it looks, and I have been in a
 19 lot of areas, took over a year to find my house, and
 20 Eastvale was it.

C2-13

21 Some questions that I have is, what makes one
 22 area any better for underground and overhead. It should
 23 look aesthetic. Like the other guy said, it's going to
 24 bring our property values down. We don't want to do
 25 that. The noise, I have recently become an avid bicycle

C2-14

C2-15

C2-16

1 rider. Every time I go by these power lines; noise,
 2 noise, noise. You can hear nothing but noise. It's
 3 actually disturbing, if these wires went down like up
 4 North, what could happen?

↑
 C2-16
 cont.

5 I was in law enforcement 30 years back in
 6 Connecticut. I have been to too many accident scenes
 7 where power lines went down, too many people were hurt.
 8 And like he said earlier, kids, something goes down,
 9 they will run to it. They will want to play with it.
 10 It's not fair. Like she also said too, the Santa Ana
 11 winds, wow, I am not used to all of this wind, but
 12 that's a major factor and something else has got to be
 13 -- take it back to the drawing board and figure out
 14 another way to do this. Thank you.

↑
 C2-17

↑
 C2-18

15 DICK SIMMONS: Hi, I am Dick Simmons, and I
 16 have been here 15 years, I think. As a resident and
 17 former counselman, now I am on the JCSD board; but I
 18 don't see a reason why all of these lines cannot go
 19 underground.

↑
 C2-19

20 I worked in LA County for many years and Edison
 21 has a program called Rule 20A program where they are
 22 providing funding to local communities to underground
 23 wires that are already up. It just doesn't make sense.
 24 Once you put them underground, they are there. You
 25 don't have to worry about them. The safety is another

↑
 C2-20

↓
 C2-21

1 important thing.

2 I just am curious of you guys hosting this
3 meeting, where is Chino Hills? Where is Chino? We have
4 a lot of residents on the other side of Helmsman that
5 aren't here tonight. Those apartments over there,
6 high-density housing over there and you are putting
7 these lines right along Chino. You should continue this
8 thing until you get full notification of all people
9 affected.

10 I don't see the school board here tonight. We
11 have a school that is going to go in right on Helmsman,
12 just off of Schleisman, and these lines are going to be
13 right on top of that school. They should be here
14 voicing their concerns about our children.

15 I don't see a reason why you can't put them
16 underground. The fires of last year, the fire storm
17 that just destroyed everything, Edison is now facing
18 lawsuits as a cause of factor for some of those fires.
19 Maybe not causing them, but also enhancing the
20 destruction of those fires, and we should just not play
21 with fire. We need to make ourselves aware, and the
22 CPUC should take that into consideration. If you put
23 them underground, you won't have to worry about them
24 anymore.

25 But I think we should do better notification.

↑ C2-21
cont.

C2-22

C2-23

C2-24

↓ C2-25

1 I don't know if we did mailing to the residences around
 2 the area, all around Helmsman, but they should be here,
 3 but nobody is here. I don't know if proper notification
 4 was made. That is my concern. I think this thing is
 5 trying to get through without public comment, but I will
 6 keep coming back to these meetings as long as you keep
 7 having them. Thank you very much.

C2-25
cont.

8 JIM POLLARD: Evening, everybody. My name is
 9 Jim Pollard. I live in Norco, and I was at the meeting
 10 last night.

11 All of the things you bring up are very
 12 concerning to the Corona people and the Norco people.
 13 As far as notification, it was two weeks ago I got
 14 notification of these meetings in the mail, and it was
 15 addressed to occupant and my address. A lot of my
 16 neighbors that I informed and talked about this project
 17 probably just threw it away not understanding it. With
 18 the word "occupant" addressed to them.

C2-26

19 Another thing, the project will go through
 20 probably but the underground -- Karen Spiegall, the mayor
 21 of Corona, voiced her opinion that everything along
 22 River Road should be underground. The same with the
 23 Norco people that talked last night, agree that it
 24 should be underground and the safety issues and the
 25 noise issues are also a concern.

C2-27

1 In Norco, it's a horse town. My backyard backs
 2 up to River Road. I have horses and when Edison comes
 3 to clean the insulators, the come through with a bucket
 4 truck, and they go up about 50 feet and turn on the
 5 insulators and it sprays in our yard. We are not
 6 notified when this happens and some of the animals get
 7 spooked.

C2-28

8 The new poles are going to be, what, 75 to
 9 80 feet tall, and aesthetically, they are not going to
 10 look very nice either. I thank you all for coming, and
 11 I thank you for your comments and continuing your search
 12 for a better answer and the right answer.

C2-29

C2-30

13 ENSWINS CORDERO: I am a resident of Eastvale
 14 and I have four young children. Biggest concern is
 15 safety, and I know that the 66 kVA lines are on the
 16 lower scale based on some of the lines that can run
 17 through some residences.

C2-31

18 But my bigger question, which I don't think has
 19 been answered, and concern, the property value thing
 20 that has been brought up, it's a real thing. It's not
 21 just for people that are in real estate, it's for actual
 22 home owners. It's for people who bought in Eastvale
 23 with a plan that once the (inaudible) come into our
 24 communities to have the prices go up -- for a lot of
 25 people, it's a plan for retirement. It's a plan for

C2-32

1 other things. It's real money. It's not just something
2 that's for a business transaction.

C2-32
cont.

3 My question was, the net benefit of these new
4 lines don't particular stay here in Eastvale. From what
5 I read, some of these -- the transmission lines are
6 going to go eventually to some development, maybe some
7 new businesses, expansions in other areas outside of
8 Eastvale, but the burden economically is also going to
9 be faced by residents here. I just don't find that
10 that's particularly fair.

C2-33

11 I have a young family. My goal is to stay here
12 in Eastvale for a very long time, and I think that
13 having these lines, of course, outside of aesthetically
14 not pleasing, hearing the buzz. I live right around the
15 Helmsman area as well. I am just concerned that
16 economically speaking, there is no (inaudible) to the
17 Eastvale community. Quite frankly, it's a burden to the
18 Eastvale community financially.

C2-34

19 So therefore, to you make it fair, it should be
20 some consideration for underground lines that would
21 obviously have higher cost but that cost should be
22 passed on to the burden of whoever is going to benefit
23 from those lines, and if that's not the city of
24 Eastvale, I just don't see how this is fair for anyone
25 who lives here, and that's all I have to say.

C2-35

1 MIKE: Would anybody else? Okay.

2 Well, with that, we will conclude the formal
3 public recording of the comments, but we will be around
4 until 8:00 o'clock, and you are welcome to take a look
5 at the posters here and ask questions. We would be
6 happy to answer your questions.

7 I would like to reiterate that we really do
8 encourage people to submit written comments. It's
9 really helpful for us. We will transcribe all of the
10 oral comments today and respond to them, but we do
11 really encourage written comments. Thank you very much
12 for coming to the meeting.

13 (The EIR Pubic Meeting concluded at 8:00 p.m.)

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REPORTER'S CERTIFICATION

I, Keisha Robinson, a Certified Shorthand Reporter
in and for the State of California, do hereby certify:

That the foregoing witness was by me duly sworn;
that the deposition was then taken before me at the time
and place herein set forth; that the testimony and
proceedings were reported stenographically by me and
later transcribed into typewriting under my direction;
that the foregoing is a true record of the testimony and
proceedings taken at that time.

IN WITNESS WHEREOF, I have subscribed my name this
11th day of July, 2018.



Keisha Robinson, CSR No. 14214

3.4.2 C2 – Responses to Oral Comments from June 28, 2018, Public Meeting

C2-1 The commenter suggests that the environmental analysis shows that the lines should be installed underground. To clarify, as discussed in Draft EIR aesthetics Section 4.1.4, *Impacts and Mitigation Measures*, discrete locations were identified along the proposed Mira Loma-Jefferson subtransmission line and source line alignments where significant Project long-term aesthetics impacts would occur. The Draft EIR also presents alternatives to the Project that would eliminate the significant long-term aesthetics impacts. It should be noted that not all of the proposed above ground alignments would result in significant long-term aesthetics impacts that require mitigation, such as undergrounding the line.

For additional discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

C2-2 For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues. The commenter's concerns about the economic effects of the Project are outside the scope of CEQA.

C2-3 The comment indicates that the community wants the lines to be installed underground. Comment noted.

C2-4 Refer to response to Comment B5-4 for discussion regarding the potential for pole failure to occur.

C2-5 Refer to response to Comment B5-4 for discussion regarding the potential for pole failure to occur.

C2-6 Refer to response to Comment B5-4. In addition, other potential health and safety impacts of the proposed Project are discussed in Draft EIR Section 4.9, *Hazards and Hazardous Materials*.

C2-7 For a discussion of the aesthetic impacts of the Project, refer to Draft EIR Section 4.1, *Aesthetics*. For discussion of Project effects associated with economic impacts, including loss of property values, see Master Response 2: Non-CEQA Issues.

C2-8 For discussion of Project effects associated with economic impacts, including loss of property values, see Master Response 2: Non-CEQA Issues.

C2-9 Refer to response to Comment B5-4 for discussion regarding the potential for wind to cause a proposed Project pole to be damaged and fall to the ground.

C2-10 The commenter states that burying the line would protect against theft, illegal connections, and sabotage. Comment noted.

- C2-11 The commenter expresses support for Alternative A, the No Action Alternative. Comment noted.
- C2-12 The commenter indicates that the options identified are not ones that the commenter would consider and that other options should be considered. A reasonable range of alternatives were identified in the Draft EIR. For the full range of alternatives considered, refer to Draft EIR Chapter 3, *Project Alternatives*.
- C2-13 The comment is an introductory statement that indicates the reason the commenter moved to Eastvale is because how nice it looks. Comment noted.
- C2-14 For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.
- C2-15 Comment noted. For a discussion of the aesthetic impacts of the Project, refer to Draft EIR Section 4.1, *Aesthetics*. For discussion of Project effects associated with economic impacts, including loss of property values, see Master Response 2: Non-CEQA Issues.
- C2-16 Comment noted. For discussion of impacts that would be associated with humming of the subtransmission lines, known as corona discharge noise, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1.
- C2-17 Comment noted. For discussion of traffic safety hazards that would be associated with the proposed Project, refer to Draft EIR traffic and transportation Impact 4.17-5.
- C2-18 Refer to response to Comment B5-4 for discussion regarding the potential for wind to cause a proposed Project pole to be damaged and fall to the ground.
- C2-19 The comment is an introductory statement that ponders why all of the lines cannot go underground. For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.
- C2-20 The CPUC Electric Tariff Rule 20A is applicable to distribution-level power lines (e.g., 33 kV and under); and is not applicable to subtransmission-level power lines as proposed for the Project (CPUC, 2017).
- C2-21 Potential public safety impacts of the proposed Project are discussed in Draft EIR Section 4.9, *Hazards and Hazardous Materials*.
- C2-22 The commenter asks why residents from Chino Hills are not at the meeting and suggests full notification of the Project has not occurred. As stated in Final EIR Section 2.1.1, *Notification*, the Notice of Availability for the Draft EIR, which included notification of the Draft EIR public meetings, was sent directly to property owners within 300 feet of the Project routes and the CPUC notified the public about the public meetings through multiple newspaper legal advertisements. Full notification for the Draft EIR public meetings has occurred.

- C2-23 The commenter expresses concern, although no specific concern, relative to a school that will go in on Hellman Avenue. This comment does not address the accuracy or adequacy of the Draft EIR.
- C2-24 For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines. For discussion of wildfire impacts that would be associated with the Project, refer to the Impact 4.9-6 and 4.9-7 discussions in Draft EIR Section 4.9, *Hazards and Hazardous Materials*.
- C2-25 Refer to response to Comment C2-22.
- C2-26 The commenter expresses concern that the Draft EIR notifications may have been thrown out by neighbors because of the word “occupant” on the envelope. Comment noted. Also, refer to response to Comment C1-3.
- C2-27 Comment noted. For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines. Potential public safety impacts of the proposed Project are discussed in Draft EIR Section 4.9, *Hazards and Hazardous Materials*, and for discussion of how EMF is addressed in this EIR, refer to Master Response 2: Non-CEQA Issues. For discussion of noise impacts that would be associated with humming and buzzing of the subtransmission lines, known as corona discharge noise, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1.
- C2-28 It is acknowledged that insulators require periodic washing with water. This is to prevent the buildup of contaminants (dust, salts, droppings, smog, condensation, etc.) and reduce the possibility of electrical arcing that can result in circuit outages and potential fire. The concern that animals have become scared when workers have performed maintenance activities on the existing lines is noted.
- C2-29 With the exemption of two 70- to 100-foot tubular steel poles (TSPs) that would be installed at the intersection of River Road and Corydon Avenue, the rest of the proposed poles that would be installed in the vicinity of Norco would be light-weight steel (LST) poles 60 to 85 feet tall. For the aesthetics analysis conducted for the Project, refer to Draft EIR Section 4.1, *Aesthetics*.
- C2-30 The comment is a conclusion statement. No response is necessary.
- C2-31 Refer to Draft EIR Section 4.9, *Hazards and Hazardous Materials*, for discussion of the potential public safety impacts of the proposed Project.
- C2-32 For discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.
- C2-33 The commenter indicates that it is not fair that the economic burden would fall on Eastvale while the Project would not benefit Eastvale. For discussion of Project effects

associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.

C2-34 Comment noted. For a discussion of the aesthetic impacts of the Project, refer to Draft EIR Section 4.1, *Aesthetics*, and for discussion of noise impacts that would be associated with buzzing of the subtransmission lines, known as corona discharge noise, refer to the *Subtransmission Line Corona Noise* discussion in Draft EIR noise Impact 4.13-1. Additionally, for discussion of Project effects associated with economic impacts, including loss of property values, refer to Master Response 2: Non-CEQA Issues.

C2-35 For discussion of issues associated with undergrounding the line, refer to Master Response 1: Underground versus Overhead Subtransmission Lines.

References

California Public Utilities Commission (CPUC), 2017. Order Instituting Rulemaking to Consider Revisions to Electric Rule 20 and Related Matters.

Southern California Edison (SCE), 2018. Electronic communication between Jack Horne, of SCE, and Matthew Fagundes, Environmental Science Associates (ESA) on October 23, 2018.

CHAPTER 4

Revisions to the Draft EIR

4.1 Introduction

Pursuant to CEQA Guidelines Section 15132, this section presents revisions to the Draft EIR to clarify or amplify its analysis and in response to received comments. Such revisions do not represent “significant new information” as that term is used in CEQA Guidelines Section 15088.5(a).

The changes are grouped by Draft EIR chapters and are then shown by page number in the Draft EIR and identified as to the location of the change in the body of the text or table.

For clarity purposes, Appendix F contains the Mitigation Monitoring and Reporting Program (MMRP). Consequently, clarification to mitigation measures is included in the MMRP in Appendix F.

Where changes are shown inserted in the existing Draft EIR text, revised or new language is underlined, deleted language is indicated by ~~strikethrough text~~, and the original text is shown without underline or strikethrough text.

4.2 Text Revisions

Executive Summary

The following sentences have been added to the second paragraph of the Draft EIR Executive Summary as follows to address the need associated with the Mira Loma-Jefferson 66 kV Line portion of the proposed Project.

Therefore, SCE proposes development of a new subtransmission/distribution substation in the City of Corona referred to as Circle City Substation that would address the forecasted electrical maximum operating limit shortfall in the ENA. SCE also proposes new 66 kV line construction and reconfiguration of the existing Mira Loma-Corona-Jefferson 66 kV Line, which would create the Mira Loma-Jefferson and Mira Loma-Corona #2 66 kV lines to address subtransmission capacity issues. The resulting Mira Loma-Jefferson and Mira Loma-Corona #2 lines are collectively referred to as the Mira Loma-Jefferson 66 kV Subtransmission Line. The proposed Project and alternatives are considered in light of this information.

The Distribution Service Objective identified in Draft EIR Section ES.2, Project Objectives, has been revised as follows to acknowledge that maintaining electrical system reliability is part of the underlying purpose of the proposed Project. The same revision to the Distribution Service Objective has been made to Draft EIR Sections 1.3.2, 3.2.2, and 5.2.

- Distribution Service Objective** – Maintain electrical system reliability by ensuring
~~Ensure~~ that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.

The third sentence in the first paragraph of Draft EIR Section ES.3, Project Description, has been revised as follows to clarify that the proposed Circle City Substation 66 kV switchrack would be low profile and the 12 kV switchrack would not be low profile. The sentence has also been revised to clarify that the proposed Mechanical and Electrical Equipment Room may be built from materials other than steel.

It would include a ~~steel~~ low-profile 66 kV steel switchrack, two 28 MVA 66/12 kV transformers, a 12 kV ~~low-profile~~ steel switchrack, two 12 kV 4.8 MVA reactive capacitor banks, a prefabricated ~~steel~~ Mechanical and Electrical Equipment Room, a permanent restroom, and a new road providing access from Leeson Lane.

The first sentence of the third bullet of air quality Mitigation Measure 4.3-2a in Table ES-1 has been revised as follows to clarify that dust stabilization monitoring would be conducted by a third party hired by SCE, not by the South Coast Air Quality Management District.

Graded and/or excavated inactive areas of the construction site shall be monitored by ~~SCAQMD air district or approved~~ a third party hired by SCE at least weekly for dust stabilization.

Mitigation Measure 4.3-2b in Table ES-1 has been revised as follows to allow for flexibility in the event that SCE is not able to identify each piece of equipment 30 days before commencement of construction activities due to unforeseeable construction equipment availability, while retaining the intent of the mitigation measure.

Mitigation Measure 4.3-2b: Construction Equipment Exhaust Reductions. For all diesel-fueled off-road construction equipment, SCE shall make a good faith effort to use available construction equipment that meets Tier 4, the highest USEPA-certified tiered emission standard. An Exhaust Emissions Control Plan that identifies each off-road unit's certified tier specification and Best Available Control Technology (BACT) shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities. Construction activities cannot commence until the Plan has been approved. For all pieces of equipment that would not meet Tier 4 emission standards, the Exhaust Emissions Control Plan shall include recent documentation from at least two local heavy construction equipment rental companies that indicates that the companies do not have access to higher-tiered equipment for the given class of equipment.

In the event that SCE is not able to identify each piece of equipment 30 days before commencement of construction activities due to unforeseeable construction equipment availability, SCE shall maintain an equipment log that lists the equipment identification

number, certified tier and BACT specification, California Air Resources Board (CARB) or South Coast Air Quality Management District (SCAQMD) operating permit specifications, and documents availability of Tier 4 equipment from rental companies, as applicable, for each piece of diesel-fueled off-road construction equipment that is not identified in the Exhaust Emissions Control Plan due to unforeseeable availability issues. The log shall be submitted to the CPUC for review and approval at least 1 week before the commencement of construction activities. Construction shall not commence until SCE confirms that all diesel equipment are included in the Exhaust Emissions Control Plan or until CPUC approves the equipment log. An updated log shall be submitted to the CPUC at least 2 days prior to when any new equipment is brought to or removed from a project work site. New equipment cannot operate at the site until the updated equipment log has been approved by the CPUC.

Draft EIR biological resources Mitigation Measure 4.4-3b in Table ES-1 has been revised as follows.

Mitigation Measure 4.4-3b: If vernal pool fairy shrimp or Riverside fairy shrimp are identified in the Project area and impacts to occupied pools cannot be avoided, SCE shall mitigate for impacts to vernal pool fairy shrimp habitat and comply with the requirements of the FESA through one or more of the following steps to provide compensatory habitat: (a) participation in the MSHCP to obtain take coverage for identified species, (b) salvage of cysts and creation of replacement pool habitat in the local area at a replacement ratio of at least 3:1, (c) restoration of affected pools onsite after the completion of construction, or (d) acquisition of credits from an approved mitigation bank within the Project region.

If occupied habitat for the above species is encountered at a Project site, to mitigate for temporary or permanent loss of aquatic sites, SCE shall implement the following measures:

Habitat Compensation or Restoration

- SCE shall mitigate for the loss of branchiopod habitat that will be filled or otherwise directly affected by the project by providing compensatory habitat; or,
- SCE shall develop and implement a mitigation, monitoring, and management plan, with input from regulatory agencies that shall outline long-term management strategies and performance standards to be attained to compensate for habitat losses resulting from the project. At a minimum, the plan shall include standards for mitigation site selection and construction specifications for mitigation sites, a description of site conditions including aerial maps, an analysis of local branchiopod habitat, and performance criteria by which site quality can be assessed over time (e.g., size, vegetation species present, date of initial ponding, ponding duration, and wildlife usage). A monitoring program will be established to track the development of habitat conditions that are conducive to the establishment of vernal pool branchiopods.
- To the greatest practicable extent, SCE or its contractors shall construct compensation habitat (i.e., replacement pools) before habitat disturbances are incurred; or directly within the project footprint after construction. A qualified biologist shall ensure that ponds are functioning as designed.

Species Protection During Construction

- SCE shall submit the name and credentials of a biologist qualified to act as construction monitor to USFWS for approval at least 15 days before construction work begins.
- If restoration is proposed to compensate for habitat loss, ~~w~~With concurrence from the USFWS, a USFWS-approved biologist shall salvage soils from sites that are known to support vernal pool branchiopods at least 2 weeks before the onset of construction, or during the preceding dry season if pools are anticipated to hold water when construction begins. The salvaged soil samples will be stored and used to inoculate created pools once minimum performance standards are met at these locations.
- A USFWS-approved biologist shall be present at each active work site within 0.5-mile of potential fairy shrimp habitat until habitat disturbance has been completed. Thereafter, the contractor or SCE shall designate a person to monitor onsite compliance with all minimization measures. A USFWS-approved biologist shall ensure that this individual receives training consistent with USFWS requirements.
- A USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of fairy shrimp and their habitat, the importance of these species and their habitat, the general measures that are being implemented to conserve fairy shrimp as they relate to the project, and the boundaries within which the project construction shall occur.
- All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any fairy shrimp habitat.

Draft EIR biological resources Mitigation Measure 4.4-9a in Table ES-1 has been revised as follows.

Mitigation Measure 4.4-9a: Should SCE opt to participate in the MSHCP, ~~a~~Apply Restoration Planning Methodology identified in Mitigation Measure 4.4-5c to Non-riparian Special-status Vegetation that is not fully covered in the MSHCP, ~~which includes Riversidean Sage Scrub.~~

The first paragraph of Mitigation Measure 4.4-12 in Table ES-1 has been revised as follows.

Mitigation Measure 4.4-12: SCE shall ensure that a preconstruction survey for roosting bats shall be conducted by a qualified biologist prior to construction activities to characterize potential bat habitat and identify active roost sites. Surveys shall be conducted within 100 feet of construction activities. If an active bat roost being used for maternity is found within 100 feet of the construction activities, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active maternity roosts by the qualified biologist. Should potential roosting habitat or active non-maternity bat roosts be found in trees to be removed or trimmed or poles to be replaced under the Project, SCE shall implement the following measures:

The following revisions have been made to Mitigation Measure 4.5-1 in Table ES-1 to clarify that a Cultural Resources Management Plan would be developed and implemented to manage project-related construction activities within the Grand Boulevard Historic District. The revisions also reflect other requirements associated with unanticipated discovery of archaeological resources, including human remains.

~~**Mitigation Measure 4.5-1:** Prior to commencing Project related construction activities associated with the Pedley Source Lines or the Alternative E4 telecommunication line, an architectural historian meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History shall assist Project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444) located in or adjacent to the Project Area— these contributing elements to the District shall subsequently be avoided during Project implementation.~~

SCE shall prepare a Cultural Resource Management Plan (CRMP) to guide all cultural resource management activities during project construction. Management of cultural resources shall follow the State standards and guidelines established in Public Resources Code (PRC) Sections 21083.2 and 21084.1 through 21084.3, as well as CEQA Guidelines Section 15064.5 and Appendix G. The CRMP shall be submitted to the CPUC for review and approval at least 30 days prior to the start of construction. The CRMP shall require, but not be limited to, the following:

1. *Construction Plan Review/Markup:* An architectural historian meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History shall assist project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444) located in or adjacent to the project construction area.
2. *Cultural Resource Monitoring and Field Reporting:* Detailed procedures shall be followed for archaeological monitoring and reporting, and for determining when monitoring is no longer necessary. Such procedures shall include, but not necessarily be limited to: archaeological monitoring – the monitor shall meet the Secretary of the Interior’s Professional Qualifications for Archeology, mapping of areas to be monitored (i.e., areas of moderate potential for archaeological resources that are in previously undisturbed sediment), and implementation of Unanticipated Discovery Protocol in the event of any identified archaeological deposits, including human remains and potential tribal cultural resources (see below); determining when monitoring is no longer necessary – confirmation that ground-disturbing work is complete in areas of moderate potential for archaeological resources that are in previously undisturbed sediment before the determination is made that monitoring is complete; reporting – submission of an archaeological monitoring report to the CPUC upon completion of construction monitoring and subsequent submission to the California Historical Resources Information System (CHRIS) upon approval by the CPUC.
3. *Unanticipated Discovery Protocol:* Detailed procedures for halting construction, defining work stoppage zones, notifying stakeholders (e.g. agencies, Native American tribes, utilities), and assessing California Register-eligibility of cultural resources, including human remains and potential tribal cultural resources in the

event that any such resources are encountered during construction. Such procedures shall include, but not necessarily be limited to the following:

- a. If prehistoric or historic-era archaeological resources are encountered during construction, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance.
 - b. The CPUC shall be immediately informed of the discovery.
 - c. A qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior's Professional Qualifications Standards for Archeology, shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment.
 - d. If human remains are uncovered during construction, SCE and/or its contractors shall immediately halt all work within 100 feet of the discovery, contact the appropriate county coroner to evaluate the remains, and follow the procedures and protocols set forth in CEQA Guidelines Section 15064.5 (e)(1). If the county coroner determines that the remains are Native American, the county coroner shall contact the NAHC within 24 hours, in accordance with California Health and Safety Code Section 7050.5(c), and PRC Section 5097.98 (as amended by Assembly Bill 2641). SCE shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further construction activities until SCE and the CPUC have discussed and conferred, as prescribed in PRC Section 5097.98, with the most likely descendants regarding their recommendations for treatment of the human remains, including, if applicable, taking into account the possibility of multiple human remains.
 - e. If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC § 21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.
4. Treatment Measures: If avoidance of a resource that may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC § 21074), is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American-related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). Treatment shall include documentation of the resource and may include data recovery or other measures. Treatment for most resources would consist of (but not necessarily be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the resource. The CRMP shall detail methods for data recovery, including analysis in a regional context, reporting of results within 1 year of completion of field studies, curation of artifacts and data (e.g., maps, field notes, archival materials, recordings, reports, photographs, and

analysts' data) at a facility that is approved by the CPUC, and dissemination of reports to appropriate repositories, including the CHRIS.

As described above, Mitigation Measure 4.5-1 has been revised to cover the intent of Mitigation Measure 4.5-2. Therefore, Draft EIR Mitigation Measure 4.5-2 is no longer needed and has been replaced in Table ES-1 with a reference to Mitigation Measure 4.5-1.

Implement Mitigation Measure 4.5-1 (see above).

~~**Mitigation Measure 4.5-2:** If prehistoric or historic era archaeological resources are encountered during Project implementation, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance. The CPUC and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior's Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment. Prehistoric archaeological materials might include obsidian and chert flaked stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic era materials might include building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.~~

~~If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC §21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.~~

~~If avoidance is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). This shall include documentation of the resource and may include data recovery or other measures. Any treatment other than preservation in place must be approved by the CPUC and the appropriate tribe if applicable. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource. The resource and treatment method shall be documented in a professional level technical report to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of approved treatment and under the direction of the qualified archaeologist.~~

Mitigation Measure 4.5-1 has been revised to cover the intent of Mitigation Measure 4.5-2. Therefore, Table ES has been revised as follows to clarify that Mitigation Measure 4.5-1 is now applicable to Impact 4.5-3.

Implement Mitigation Measure 4.5-~~2~~1 (see above).

The mitigation measure described for Impact 4.7-3 in Draft EIR Table ES-1 contains a typographic error. The name of the mitigation measure has been revised as follows.

Implement Mitigation Measure 4.3-~~1~~2a.

Mitigation Measure 4.9-8 in Draft EIR Table ES-1 has been revised as follows to clarify that its intent is to reduce the potential nuisance associated with people perceiving currents or experiencing small electric shocks and to acknowledge that there would be no Project-related electric shock nuisance outside of the existing 500 kilovolt (kV) right-of-way (ROW).

Mitigation Measure 4.9-8: As part of the siting and construction process, SCE shall identify objects, such as fences, metal buildings, pipelines, etc. that are within the 500 kV ROW that have the potential for induced voltages to cause a perceptible current or small electrical shock and shall implement electrical grounding of those metallic objects in accordance with Cal/OSHA Electrical Safety Orders at 8 CCR 2739. The identification of objects shall be provided to the CPUC at least 30 days prior to the commencement of construction, and shall document the thresholds of electric field strength and metallic object size at which grounding becomes necessary.

The first sentence of Mitigation Measure 4.17-1 in Draft EIR Table ES-1 has been revised as shown below.

Mitigation Measure 4.17-1: As part of any encroachment permit, SCE shall prepare and implement a Traffic Management Plan subject to approval of Caltrans and/or the applicable local government(s), including agencies that operate alternative modes of transportation (e.g., North Main Corona Metrolink Station, the Corona Cruiser/RTA bus route, and the Metrolink Rail path).

Chapter 1. Introduction

The first sentence of the third paragraph in Draft EIR Section 1.2 has been revised as follows to clarify that the proposed substation switchrack would be built to accommodate two additional 66 kV switchrack positions.

In addition to the switchrack positions necessary for a 56 MVA substation, the site would be built to accommodate ~~with~~ two additional ~~(open)~~ 66 kV switchrack positions that would allow for a potential future 66 kV network growth, and/or substation capacity upgrades to 112 MVA.

The second to last sentence in Draft EIR project description Section 1.3.1.2, Subtransmission, has been revised as follows to indicate that the existing Mira Loma-Corona-Jefferson 66 kV Line would be reconfigured to become the Mira Loma-Jefferson and Mira Loma-Corona #2 66 kV

lines and to indicate that to do so a new 66 kV circuit would need to be installed between Mira Loma and Corona substations.

To address this subtransmission line capacity issue, SCE proposes to ~~replace~~ reconfigure the existing Mira Loma-Corona-Jefferson 66 kV Line to become ~~with~~ the Mira Loma-Jefferson and Mira Loma-Corona #2 66 kV lines by adding a new 66 kV circuit between Mira Loma and Corona substations.

The revisions to Draft EIR Section 1.3.1, Project Purpose, identified below have been made to present SCE's 2018 10-year power flow forecast. The information suggests that the forecasted electrical maximum operating limit for the electrical needs area (ENA) would be exceeded in 2023, which would be 1 year earlier than identified in the Draft EIR, and that the operating limit of the Mira Loma-Corona-Jefferson subtransmission line would be exceeded during an N-1 outage to the Mira Loma-Corona-Jefferson subtransmission line in 2020 under peak electrical demand conditions and abnormal system configurations, which would be 2 years later than identified in the Draft EIR. This new SCE information does not result in the identification of any new significant impacts, and does not change the Draft EIR's conclusions about the feasibility of the alternatives, or ability of the various alternatives analyzed or dismissed to meet the Project objectives (see text revisions to Draft EIR Chapter 3, Alternatives, below).

1.3.1 Project Purpose

1.3.1.1 Subtransmission (66 kV) / Distribution (12 kV) Substation

SCE conducts annual power flow demand 10-year forecast studies for the electrical needs area (ENA). The current combined operating capacity of the Corona, Jefferson, and Chase substations that serve the ENA for the proposed Project is 434.6 MVA under a normal system configuration.

Table 1-1a, *Electrical Needs Area Substation Capacity and Peak Demand by Year, Historical Data and the 2017 – 2026 Forecasts for the 2017 – 2026*, provides the ~~current~~ historical and forecasted load values associated with the 2017 through 2026 forecast for the substations located in the ENA, including Corona, Jefferson, and Chase substations. As shown in the table, the projected electrical demand is expected to exceed the maximum operating limits by 2024, which would affect SCE's ability to safely and reliably serve the electrical demand within the ENA. Therefore, SCE proposes development of a new subtransmission/distribution substation in the City of Corona referred to as Circle City Substation that would address the forecasted electrical maximum operating limit shortfall in the ENA.

Subsequent to the release of the Draft EIR, SCE finalized its 2018 through 2027 power flow forecast for the ENA. **Table 1-1b**, *Electrical Needs Area Substation Capacity and Peak Demand by Year, Historical Data and Forecast for 2018 – 2027*, provides the historical and forecasted load values associated with the 2018 through 2027 forecast for

TABLE 1-1a
ELECTRICAL NEEDS AREA SUBSTATION CAPACITY AND PEAK DEMAND BY YEAR, HISTORIC DATA AND FORECASTS FOR 2017 - 2026

Load Data for the Electrical Needs Area	Historic Data					Forecasts									
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
Maximum Operating Limit (MVA)	435	435	435	435	435	435	435	435	435	435	435	435	435	435	435
Peak Demand - Normal Weather (MVA)	364	369	364	371	366	371	379	385	389	394	396	398	400	402	404
Peak Demand – Extreme Heat (MVA)	399	404	397	404	398	404	413	419	424	429	431	433	436	438	441
Reserve (Maximum Operating Limit – Extreme Heat) (MVA)	36	31	38	31	37	31	22	16	11	6	4	2	-1	-3	-6
Percent Utilization (Extreme Heat + Maximum Operating Limit)	92%	93%	91%	93%	91%	93%	95%	96%	97%	99%	99%	100%	100%	101%	101%

SOURCE: Based on SCE, 2017a, with forecast based in part on 10 years of historical load data.

TABLE 1-1b
ELECTRICAL NEEDS AREA SUBSTATION CAPACITY AND PEAK DEMAND BY YEAR, HISTORIC DATA AND FORECASTS FOR 2018 - 2027

Load Data for the Electrical Needs Area	Historic Data					Forecasts									
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
Maximum Operating Limit (MVA)	435	435	435	435	435	435	435	435	435	435	435	435	435	435	435
Peak Demand - Normal Weather (MVA)	369	364	371	366	373	382	383	392	395	401	405	409	411	414	416
Peak Demand – Extreme Heat (MVA)	404	397	404	398	406	411	414	423	427	432	437	441	445	448	451
Reserve (Maximum Operating Limit – Extreme Heat) (MVA)	31	38	31	37	29	24	21	12	8	3	-2	-6	-10	-13	-16
Percent Utilization (Extreme Heat + Maximum Operating Limit)	93%	91%	93%	92%	93%	95%	95%	97%	98%	99%	101%	101%	102%	103%	104%

SOURCE: Based on SCE, 2018a, with forecast based in part on 10 years of historical load data.

the ENA substations. SCE's updated forecast indicates the projected need date of the Circle City Substation has changed to 2023 from 2024 (SCE, 2018a). SCE has provided the following two reasons for the changed need date:

- 1) Actual demand in 2017 exceeded SCE's forecast. Specifically, in 2017 the normal weather peak demand value was projected to be 404 MVA and the recorded value was 406 MVA, 2 MVA higher than projected;
- 2) In 2019 and 2020 there will be additional load added to the 12 kV circuits in the ENA that was not included in the previous forecasts. This is a result of the planned conversion of approximately 5.6 MVA of load that is currently served by the 33/4 kV transformers at Corona Substation. These 4 kV facilities are scheduled for conversion to 12 kV as part of a long-term system-wide SCE program to eliminate (through conversion to higher and standardized distribution voltages) its antiquated 4 kV voltage system. Following the conversion process, the service voltage at 4 kV will be eliminated and the load will be integrated into the surrounding 12 kV system. As a result, it presents itself as new load on the 12 kV system.

The current 10-year forecast (2018 through 2027) for only new load growth (i.e., increases due to new customers and base load growth versus the 4 kV load that would be added to the 12 kV system) is slightly less than the previous 2017 through 2026 forecast (SCE, 2018a) continuing a decline in forecasted new load growth over recent years.

In addition to the need associated with projected load growth, SCE has indicated that providing the ENA with an additional substation and the associated distribution circuitry would provide the ability to relieve the existing substations and circuits of some of the electrical demand, thereby increasing the capacity margin across all three of the existing substations. This increased capacity margin would be useful in addressing the uncertainties caused by variables that effect capacity, such as human behavior and the corresponding electrical consumption, weather conditions, and the availability of routes for distribution circuits to adequately distribute the capacity of the substation transformers, that could result in a constrained local-area electrical system because of the limited capacity margin at the three existing substations for operations and planning (SCE, 2017e).

1.3.1.2 Subtransmission

The 66 kV subtransmission lines that currently serve the ENA have operating limits of 125 MVA under normal system conditions and 168 MVA under contingency or abnormal system conditions referred to as an N-1 contingency. An N-1 contingency is a scenario where a single subtransmission line in the ENA would be put out of service due to an outage, which would put more stress on the other subtransmission lines in the ENA. Based on SCE's modeling efforts conducted for the Project associated with the 2017 through 2026 forecast, the operating limit of the Mira Loma-Corona-Jefferson Subtransmission Line would be exceeded during an N-1 outage to the Mira Loma-Cleargen-Delgen subtransmission lines in 2018 under peak electrical demand conditions and abnormal system configurations, and the operating limit of the Mira Loma-Corona Subtransmission Line would be exceeded in 2020 under normal peak electrical demand

conditions (SCE, 2018). To address this subtransmission line capacity issue, SCE proposes to ~~replace~~ reconfigure the existing Mira Loma-Corona-Jefferson 66 kV Line to become with the Mira Loma-Jefferson and Mira Loma-Corona #2 66 kV lines by adding a new 66 kV circuit between Mira Loma and Corona substations. The Mira Loma-Jefferson and Mira Loma-Corona #2 lines are collectively referred to as the Mira Loma-Jefferson 66 kV Subtransmission Line.

Subsequent to the release of the Draft EIR, SCE finalized its 2018 through 2027 power flow forecast for the ENA. Based on SCE's revised forecast for 2018 through 2027, the operating limit of the Mira Loma-Corona-Jefferson Subtransmission Line would be exceeded during an N-1 outage to the Mira Loma-Corona-Jefferson subtransmission line in 2020 under peak electrical demand conditions and abnormal system configurations (see **Table 1-1c, N-1 Conditions: Mira Loma-Corona-Jefferson 66 kV Line (Outage of Mira Loma-Cleargen-Delgen 66 kV Line), Forecast for 2018 – 2027**), and the operating limit of the Mira Loma-Corona Subtransmission Line would be exceeded in 2022 under normal peak electrical demand conditions (see **Table 1-1d, Base Case Conditions: Mira Loma-Corona 66 kV Line, Forecast for 2018 – 2027**) (SCE, 2018a). SCE has provided no details as to why the revised forecast varies from the previous forecast.

TABLE 1-1c
N-1 CONDITIONS: MIRA LOMA-CORONA-JEFFERSON 66 kV LINE
(OUTAGE OF MIRA LOMA-CLEARGEN-DELGEN 66 kV LINE), FORECAST FOR 2018 – 2027

<u>N-1: Load Data for the Mira Loma-Corona-Jefferson 66 kV Line (outage of Mira Loma-Cleargen-Delgen 66 kV Line)</u>	<u>Forecast Data</u>									
	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>
<u>Maximum Operating Limit (MVA)¹</u>	<u>168</u>	<u>168</u>	<u>168</u>	<u>168</u>	<u>168</u>	<u>168</u>	<u>168</u>	<u>168</u>	<u>168</u>	<u>168</u>
<u>Peak Demand: Extreme Heat (MVA)²</u>	<u>164</u>	<u>168</u>	<u>170</u>	<u>172</u>	<u>175</u>	<u>178</u>	<u>181</u>	<u>183</u>	<u>186</u>	<u>189</u>
<u>Reserve (Maximum Operating Limit minus Peak Demand: Extreme Heat) (MVA)³</u>	<u>4</u>	<u>0</u>	<u>-2</u>	<u>-4</u>	<u>-7</u>	<u>-10</u>	<u>-13</u>	<u>-15</u>	<u>-18</u>	<u>-21</u>
<u>Percent Utilization (Peak Demand: Extreme Heat divided by Maximum Operating Limit)⁴</u>	<u>97.6%</u>	<u>100.0%</u>	<u>101.2%</u>	<u>102.4%</u>	<u>104.2%</u>	<u>106.0%</u>	<u>107.7%</u>	<u>108.9%</u>	<u>110.7%</u>	<u>112.5%</u>

¹ "Maximum Operating Limit" is the maximum operating capacity of Mira Loma-Corona-Jefferson 66 kV Line during **N-1 conditions**.

² "Peak Demand: Extreme Heat" is the forecast peak demand value expected at 1-in-5 year heat storm temperatures (4 deg. F above average).

³ "Reserve" is the amount of capacity remaining between the "Peak Demand: Extreme Heat" value and the "Maximum Operating Limit" value.

⁴ "Percent Utilization" is the "Peak Demand: Extreme Heat" value divided by the "Maximum Operating Limit" value.

SOURCE: Based on SCE, 2018a.

TABLE 1-1d
BASE CASE CONDITIONS: MIRA LOMA-CORONA 66 kV LINE, FORECAST FOR 2018 – 2027

Base Case: Load Data for the Mira Loma-Corona 66 kV Line	Forecast Data									
	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
Maximum Operating Limit (MVA) ¹	125	125	125	125	125	125	125	125	125	125
Peak Demand: Extreme Heat (MVA) ²	119	121	123	124	126	127	128	130	131	133
Reserve (Maximum Operating Limit minus Peak Demand: Extreme Heat) (MVA) ³	6	4	2	1	-1	-2	-3	-5	-6	-8
Percent Utilization (Peak Demand: Extreme Heat divided by Maximum Operating Limit) ⁴	95.2%	96.8%	98.4%	99.2%	100.8%	101.6%	102.4%	104.0%	104.8%	106.4%

¹ "Maximum Operating Limit" is the maximum operating capacity of Mira Loma-Corona 66 kV Line during **base case conditions**

² "Peak Demand: Extreme Heat" is the forecast peak demand value expected at 1-in-5 year heat storm temperatures (4 deg. F above average).

³ "Reserve" is the amount of capacity remaining between the "Peak Demand: Extreme Heat" value and the "Maximum Operating Limit" value.

⁴ "Percent Utilization" is the "Peak Demand: Extreme Heat" value divided by the "Maximum Operating Limit" value.

SOURCE: Based on SCE, 2018a.

The Distribution Service Objective in Draft EIR Section 1.3.2 has been revised as follows.

Distribution Service Objective – Maintain electrical system reliability by ensuring ~~Ensure~~ that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.

The Encroachment Permit row and Jurisdictional/Purpose column under the State heading in Draft EIR Table 1-2 has been revised as follows to accurately reflect the State highways that would be impacted by the Project.

Construction, operation, and maintenance within, under, or over state highway (State Route 448-91 and Interstate 15) ROW

To clarify that there would be a potential that the MSHCP requirements would apply to the Project, an additional row has been added to Draft EIR introduction Table 1-2 as follows.

<u>Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Certificate of Inclusion</u>	<u>Western Riverside County Regional Conservation Authority</u>	<u>If SCE decides to participate in the MSHCP, it would be required to implement the MSHCP as a Participating Special Entity (PSE)</u>
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The following reference has been added to the References – Introduction section at the end of Draft EIR Chapter 1, Introduction, has been revised as follows:

SCE, 2018a. Southern California Edison Response to California Public Utilities Commission (CPUC) Data Request No. 17, Questions 1 and 2 Responses for the

Circle City Substation and Mira Loma-Jefferson Substation Line Project,
August 15, 2018.

Chapter 2. Project Description

The following revision has been made to the first sentence of Draft EIR project description Section 2.5.1.2, 66 kV Switchrack.

The substation would include a ~~steel~~ 66 kV steel switchrack, approximately 5 feet tall, 156 feet long and 120 feet wide.

The third to last sentence in Draft EIR project description Section 2.5.2.1 has been revised as follows to clarify the meaning of “underbuild.”

See also **Figure 2-7, Subtransmission Structures**, which illustrates single-circuit and double-circuit configurations with and without underbuild (i.e. additional wires, cables, and other facilities below the subtransmission conductor position on the structures) for the different types of poles and other structures proposed for installation.

The following sentence has been added to the last sentence of Draft EIR Project description Section 2.5.2.1, Overview, to state that exact pole and infrastructure locations would be planned to minimize any conflict with existing and planned features in the public right-of-way.

Prior to placement of poles and other subtransmission infrastructure, SCE would conduct an evaluation of existing and approved features along the public rights-of-way, including but not limited to, existing and planned drive ways, street light poles, underground utilities, and other features. Exact pole and infrastructure locations would be planned to minimize any conflict with these features.

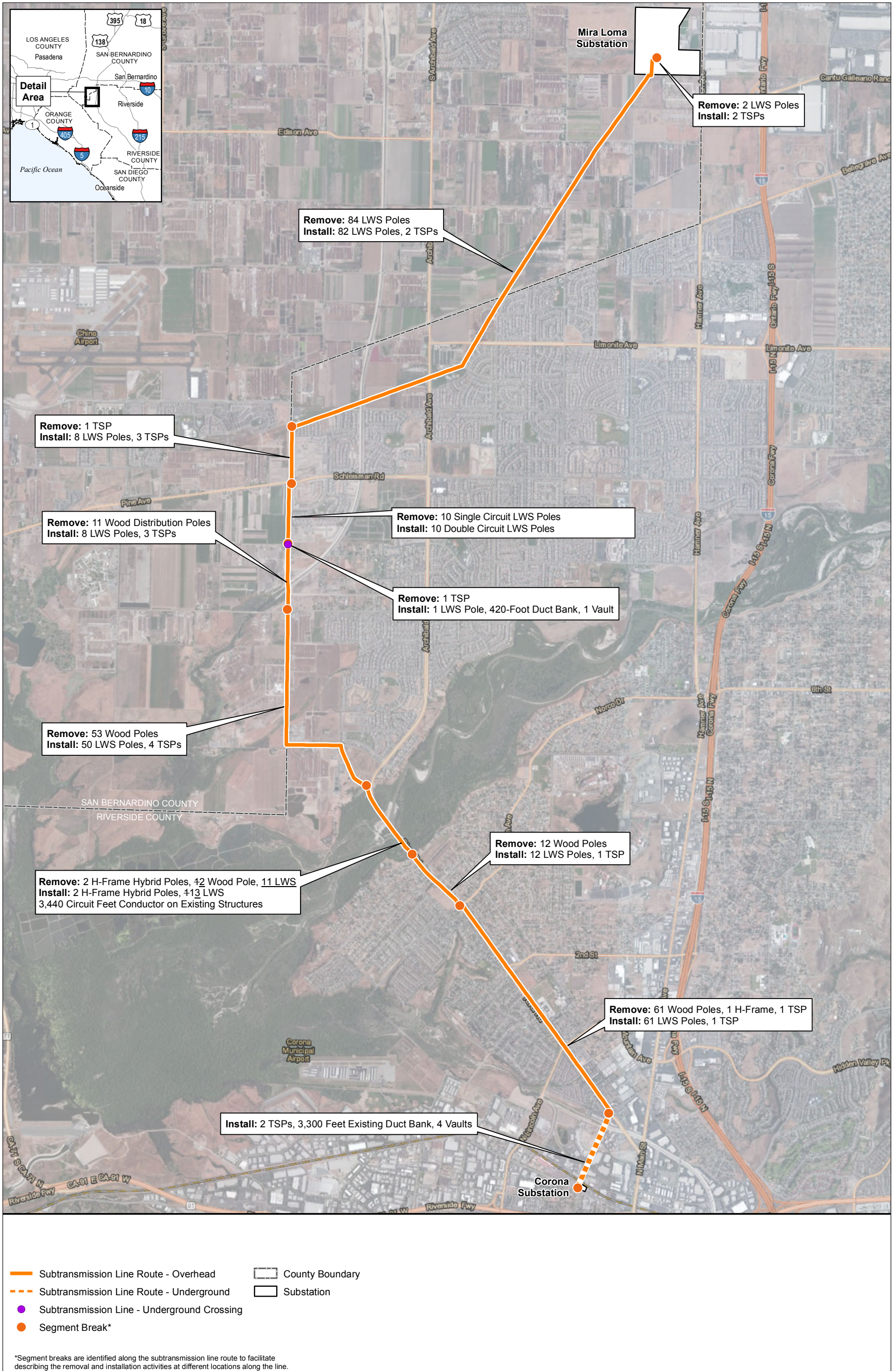
The second to last sentence in Draft EIR project description Section 2.5.2.3 has been revised as follows to clarify the lines would continue along the south side of Leeson Lane.

The lines would continue northeasterly along the south side of Magnolia Avenue to Leeson Lane, where they would continue northeast along the south side of Leeson Lane, and then turn and travel southeast onto private property to the proposed Circle City Substation site (see Figure 2-20).

Draft EIR Figure 2-6 has been revised as shown on the following page to reflect the correct amount of poles to be removed and installed in the vicinity of Santa Ana River.

Draft EIR project description Table 2-1 note 1 has been revised as follows to acknowledge that exact pole/structure type and quantity are subject to final engineering and other factors. See response to Comment A20-53 for other revisions to the table note.

¹ Specific pole/structure type, quantity, height, and spacing would be determined upon final engineering and other factors, and would be constructed in compliance with CPUC General Order (GO) 95 and SCE standards.



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Draft EIR project description Table 2-1 note 2 has been revised as follows to acknowledge that not all wood poles would be guyed.

- ² Wood poles ~~would~~could consist of a wood pole with a steel wire known as a "down guy," which attaches to a 1-inch-diameter anchor at ground level located at the back side of the wood pole and a steel span guy that attaches to the top of the wood pole and the subtransmission poles (wood and LWS).

The second paragraph of Draft EIR project description Section 2.5.4.1, Pedley Source Lines, has been revised as follows to indicate that existing distribution facilities on the pole to be removed would be transferred to a new distribution structure (i.e., wood or light-weight steel (LWS) pole), not the new proposed tubular steel pole (TSP).

Location 2: One distribution pole would be removed at the end of Quarry Street, east of the Temescal Wash flood control channel. Existing distribution facilities would be transferred to a new proposed TSP distribution structure (i.e., wood or LWS pole). In addition, an existing underground distribution duct bank would be extended approximately 100 feet to the new TSP distribution structure (i.e., wood or LWS pole).

The fourth sentence in the fifth paragraph of Draft EIR project description Section 2.5.5, Telecommunication Facilities, has been revised as shown below to correct a misspelling of "Pedley."

At Joy Street, the fiber optic cable would convert to overhead at the proposed LWS pole that would be associated with the ~~Paley~~Pedley Lines.

The last sentence in Draft EIR project description Section 2.6.3, Vegetation Clearance, has been revised as shown below to clarify that any mulched debris would be spread on site.

Debris would be mulched and spread on site or it would be removed to a permitted disposal location.

The following revisions have been added to Draft EIR project description Section 2.6.4.1, Grading and Drainage, to include description of the on-site swales.

The substation pad would be graded to maintain a minimum of 1-percent slope to drain toward the north. Surface runoff at the site would drain to the north on surface swales through both the eastern and western site corridors, discharging at Leeson Lane. If required by the City of Corona, an approximately 700-foot extension of the existing storm drain system may be constructed to accept site flow onto Leeson Lane.

The fifteenth row in Draft EIR project description Table 2-4, Estimated Temporary and Permanent Land Disturbances, under the Mira Loma-Jefferson 66 kV Subtransmission Line heading has been revised as follows to clarify the units of the 420 value.

Install new underground duct bank (6, 7, 16)	420 <u>linear feet</u>	Linear feet by 15 feet wide	0.1	0.1	0.0
--	------------------------	-----------------------------	-----	-----	-----

The second sentence in Draft EIR project description Section 2.6.6.3, Conductor Stringing, has been supplemented as shown below to identify additional safety devices SCE indicates would be used during conductor stringing.

To ensure the safety of workers and the public, safety devices such as traveling grounds, electrical-shock prevention mat, guard structures, radio-equipped public safety roving vehicles, and linemen would be in place prior to the initiation of wire stringing activities.

The second sentence in “Step 5” in Draft EIR project description Section 2.6.6.3, Wire Stringing, has been deleted as shown below to clarify that the proposed subtransmission line conductors would not be bundled.

Step 5 – Clipping-In: After the conductor is dead-ended, the conductors would be secured to all tangent structures using a process called “clipping in.” ~~Once this is complete, spacers would be attached between the bundled conductors of each phase to keep uniform separation between each conductor.~~

The second sentence in Draft EIR project description Section 2.6.6.4, Guard Structures, has been supplemented as follows to acknowledge that the California Department of Transportation may be the State agency that would require netting over State roadways.

Temporary netting could be required to be installed by the California Highway Patrol, California Department of Transportation, or other jurisdictional agency to protect under-built infrastructure such as highway, railroad, and open channel water crossings.

The first sentence in Draft EIR project description Section 2.6.7.2 has been revised as follows to accurately reflect the total length of new underground 66 kV line that would be associated with the proposed Project.

The Project includes a total of approximately ~~4,980~~ 4,910 feet of new underground 66 kV subtransmission lines and associated transition and support structures.

The third sentence in Draft EIR project description Section 2.6.7.4, Duct Bank Installation, has been revised as follows to accurately reflect the duct bank components.

Duct banks would consist of six ~~or eight~~ 6-5-inch-diameter polyvinyl chloride (PVC) conduits fully encased with a minimum of 3 inches of concrete all around.

The last sentence in the first paragraph of Draft EIR project description Section 2.6.7.5, Vault Installation, has been revised as follows to accurately reflect SCE’s standards for subtransmission line vault spacing.

The vaults would be placed approximately ~~300 to 800~~ 50 to 1,500 feet apart along the underground portion of the subtransmission lines.

The third sentence in Draft EIR project description Section 2.6.8, Energizing 66 kV Subtransmission Lines, has been revised as follows to acknowledge that de-energizing and re-energizing the existing subtransmission lines may not occur at night.

To reduce the need for electric service interruption, de-energizing and re-energizing the existing subtransmission lines would occur ~~at night~~ when electrical demand is low or otherwise in accordance with California Independent System Operator's requirements.

The first sentence in the second paragraph of Draft EIR project description Section 2.6.9, Telecommunications Construction, has been revised as follows to reference the correct section for conductor stringing.

Overhead fiber optic cable would be installed on overhead structures, as described in Section ~~2.6.6.3-2.6.5.3~~, **Error! Reference source not found.**

The last sentence in the third paragraph of Draft EIR project description Section 2.6.9 has been supplemented as shown below to clarify that the manholes or pull boxes themselves would not be backfilled.

The manhole or pull box would be lowered into place, connected to the conduits, and the area surrounding the manhole or pull box would be backfilled with concrete slurry.

The second paragraph in Draft EIR project description Section 2.6.15, Construction Schedule, has been revised as follows to clarify that per General Order 131-D, SCE would not be required to obtain discretionary approvals, such as variances, from local jurisdictions for work that would be required to be conducted outside allowed hours and days as specified by ordinance.

Construction activities would adhere to the allowable construction work hours specified in the noise ordinances of local jurisdictions, ~~including as allowed by variance if necessary with the possible exception of some construction activities. Work may be necessary outside generally allowed periods,~~ for example, to deliver the transformer, fill substation transformers, or to effect or respond to outages (planned or unplanned) during nighttime hours.

In the event construction activities are necessary on days or hours outside of what is specified by ordinance (for example, if existing electricity lines must be taken out of service for the work to be performed safely and the line outage must be taken at night for system reliability reasons, or if construction needs require continuous work), SCE would provide 5-day advanced notification, including a general description of the work to be performed, location, and hours of construction anticipated, to the CPUC, any applicable/impacted local jurisdiction, and residents within 300 feet of the anticipated work, as well as route all after-hours construction traffic away from residences, schools, and recreational facilities to the maximum extent feasible. These requirements may be waived in the event that emergency and/or potentially unsafe work conditions would be created by limiting construction activities to those hours specified by ordinance. SCE would report any such events to the CPUC within 5 business days.

A new sentence has been added after the first sentence in the sixth paragraph of Draft EIR project description Section 2.7, Operation and Maintenance, as shown below to clarify that SCE may need to develop new access in some cases to maintain poles.

Maintenance of some pole locations and associated lay down areas could result in ground and/or vegetation disturbance, though attempts would be made to utilize previously disturbed areas to the greatest extent possible. In some cases, new access may be created to remove and replace an existing pole.

The last sentence of the Subtransmission bullet in Draft EIR project description Section 2.9, Land Rights, has been revised as follows to clarify that the private properties would require new or amended land rights.

SCE would install the proposed subtransmission facilities within existing SCE fee-owned ROW, easements, and public ROW where SCE is in franchise; however, approximately 110 private properties would require new or ~~upgraded~~ amended land rights and agency permits (87 private property and 23 agency) based on final engineering.

The last sentence in Draft EIR project description Section 2.9 has been revised as follows to clarify that upgraded easements may include amending existing land rights.

Upgrading easements may include amending existing ~~adding~~ land rights; by adding width to existing easements; and improving or clarifying access or maintenance rights.

Chapter 3. Project Alternatives

The Distribution Service Objective in Draft EIR Section 3.2.2 has been revised as follows.

- **Distribution Service Objective** – Maintain electrical system reliability by ensuring ~~Ensure~~ that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.

The first sentence in the third to last paragraph in Draft EIR project alternatives Section 3.2.2, Consistency with Project Purpose and Objectives, has been revised as shown below to clarify that maintaining electric reliability is part of the Project objectives.

In order to assess the ability of alternatives to maintain electric reliability by meeting forecasted electrical demand and maintaining sufficient voltage, the following factors were considered:

The first sentence in the second paragraph of Draft EIR project alternatives Section 3.2.4, Potential to Eliminate Significant Environmental Effects, has been revised as follows to accurately reflect the significant and unavoidable environmental impacts of the Project.

The Project would result in significant and unavoidable environmental effects on aesthetics, air quality, ~~hazards~~, and noise.

The last bullet under Hazards and Hazardous Materials in Draft EIR project alternatives Table 3-2, Summary of Less than Significant with Mitigation (Class II) Environmental Impacts of the Project, has been revised as follows to clarify that the subject impact is associated with the potential for nuisance associated with people perceiving currents or experiencing small electric shocks.

- Induced currents associated with operation of the Project could generate perceptible currents or small electrical shocks.

The first column of the Alternative E3 row in Draft EIR project alternatives Table 3-3, Summary of Alternatives Screening Analysis, has been revised as follows to correctly indicate that the alternative also includes the Pedley Source Lines and the Mira Loma-Jefferson subtransmission line.

Alternative E3: Southern 66 kV Source Lines Alignment. This alternative would replace the Databank Source Lines. Alternative E3 also includes construction of Circle City Substation, ~~Databank-Pedley~~ Source Lines, and the Mira Loma-~~Jefferson~~ subtransmission line (and/or associated alternatives).

The first column of the Alternative E4 row in Draft EIR project alternatives Table 3-3 has been revised as follows to correctly indicate that the alternative also includes the Mira Loma-Jefferson subtransmission line.

Alternative E4: Databank 66 kV Source Lines Only. This alternative would eliminate the Pedley Source Lines component of the Project. Alternative E4 also includes construction of Circle City Substation, Circle City to Corona fiber line, and the Mira Loma-~~Jefferson~~ subtransmission line (and/or associated alternatives).

The second sentence of the fourth paragraph in Draft EIR project alternatives Section 3.4.1, Alternative A: No Project, has been revised as follows to correctly reference the Mira Loma System.

Operating procedures to relieve base case thermal overloads of the subtransmission system forecasted as early as 2018 would include transferring load between the substations via distribution circuits, load dropping on one or more distribution circuits, or disconnecting entire substations from the Mira Loma ~~Vista~~ System.

The first sentence of the second paragraph in Draft EIR Section 3.4.1, Alternative A: No Project, has been revised as follows to reflect new information relative to SCE's 2018 through 2027 power flow forecast (see text revisions to Chapter 1, Introduction).

Alternative A would fail to meet the Distribution Service Objective and as a result, the ENA would potentially experience a shortage of electricity and the electrical distribution system could become vulnerable to upset starting year ~~2024~~ 2023.

The second sentence of the fourth paragraph in Draft EIR Section 3.4.1, Alternative A: No Project, has been revised as follows to reflect new information relative to SCE's 2018 through 2027 power flow forecast (see text revisions to Chapter 1, Introduction).

Operating procedures to relieve base case thermal overloads of the subtransmission system forecasted as early as ~~2018~~ 2020 would include transferring load between the substations via distribution circuits, load dropping on one or more distribution circuits, or disconnecting entire substations from the Loma Vista System.

Draft EIR Figure 3-2b has been revised as shown on the following page to show the telecommunication lines that would be associated with Alternative C3.

The 50 MW Connected to Corona Substation discussion in Draft EIR project alternatives Section 3.4.3.3, Alternative C3: 66 kV Subtransmission-Level Battery Storage, has been supplemented with an additional third paragraph as shown below to include information about the telecommunication lines SCE states would be required to connect the 50 MW facility to SCE's existing telecommunications system.

In addition, two telecommunications lines would be required to connect the facility to SCE's existing telecommunications system. One telecommunications line would exit the battery storage substation site in an underground configuration for approximately 100 feet to the north side of West 6th Street. The telecommunication line would rise to an overhead position and follow the same alignment as the new double-circuit 66 kV subtransmission line to S. Lincoln Avenue where it would tap into the existing Mira Loma-Corona Fiber Optic Cable. The second telecommunications line would exit the battery storage facility and be installed approximately 1,100 feet of new underground conduit and cable along the north side of W. 6th Street to an existing pole on South Sherman Street, where it would rise and tap into the existing Corona-Pedley Fiber Optic Cable.

The 42 MW Facility Connected to Jefferson Substation discussion in Draft EIR project alternatives Section 3.4.3.3 has been supplemented with an additional paragraph as shown below to include information about the telecommunication lines SCE states would be required to connect the 42 MW facility to SCE's existing telecommunications system.

In addition, two telecommunications lines would be required to connect the 42 MW facility to SCE's existing telecommunications system. One telecommunications line would exit the battery storage substation site in an underground configuration for approximately 150 feet to the west side of the drainage canal that borders the east side of the site. The telecommunication line would rise to an overhead position and follow the same alignment as the double-circuit 66 kV subtransmission line to a pole just north of Jefferson Substation. The telecommunications line would then convert to an underground configuration and continue into Jefferson Substation in approximately 520 feet of new underground conduit to the existing Mechanical and Electrical Equipment Room (MEER) building. The second telecommunications line would exit the battery storage facility in an underground configuration for approximately 150 feet to the west side of the drainage canal that borders the east side of the site. The telecommunications line would rise to an overhead position and continue north along existing poles for approximately 1,700 feet to the south side of Tenth Street, where it would convert to an underground position. The telecommunications line would continue easterly approximately 1,500 feet in new underground conduit to an existing pole on S. Lincoln Avenue and would rise to an overhead position. The telecommunications line would then continue south along the existing pole line for approximately 5,700 feet to the northeast corner of W. Ontario Avenue and S. Lincoln Avenue where it would convert to an underground position and continue into Jefferson Substation in approximately 260 feet of new underground conduit to the existing MEER.



SOURCE: SCE, 2017c

Circle City Substation and Mira Loma-Jefferson 66 kV Line Project . 207584

Figure 3-2b

66 kV Subtransmission Line Alternative C3

The third sentence in the 40 MW Facility Connected to Chase Substation discussion in Draft EIR project alternatives Section 3.4.3.3 has been revised as follows to show the correct spelling of Leeson Lane.

It would be accessed by a 26-foot-wide driveway from ~~Lesson~~Leeson Lane that would enter the site from the northeast.

The 40 MW Facility Connected to Chase Substation discussion in Draft EIR project alternatives Section 3.4.3.3 has been supplemented with an additional paragraph as shown below to include information about the telecommunication lines SCE states would be required to connect the 40 MW facility to SCE's existing telecommunications system.

In addition, two telecommunications lines would be required to connect the 40 MW facility to SCE's existing telecommunications system. One telecommunications line would be along Magnolia Avenue and would tap the battery storage facility to the existing Corona-Jefferson fiber line. The proposed 5,500-foot telecommunications line (referred to here as the Battery Storage Tap to Corona-Jefferson fiber route) would consist of approximately 2,500 feet of new underground conduit and approximately 3,000 feet in existing underground conduit. The second telecommunications line would be 18,000 feet long and would consist of approximately 5,200 feet of new underground conduit, approximately 5,000 feet of new fiber placed in existing underground conduit, and approximately 7,800 feet of the line would be attached to existing distribution poles. Refer to Figure 3-2b, for an illustration of the alternative fiber alignment and where it would be installed in underground conduit and where it would be installed overhead on existing distribution poles. The new conduit would exit the 40 MW facility on Leeson Lane, turn north on Magnolia Avenue, and then west on East 6th Street to a location west of El Camino Avenue and the railroad. There would also be short segments of conduit installed along East 3rd Street, South Belle Street, and North Sheridan Street. The majority of the new conduit would be installed using a backhoe (SCE, 2018i); however, directional boring would be used for the telecommunication fiber to cross under the existing Burlington Northern Santa Fe (BNSF) railroad tracks that run north/south, approximately 50 feet east of El Camino Avenue. The directional boring would take place approximately 40 feet east of El Camino Avenue in an east/west direction. The bore (tunnel) would be approximately 80 feet in length, 12 inches in diameter, and 3 feet deep. Entrance and exit pits would be approximately 4 feet wide, 8 feet long, and 4 feet deep. The duration of boring activities to cross under the railroad tracks would take approximately 2 days. Site preparation and restoration for the bore pits on 6th Street would include saw-cutting the required area and removing asphalt, excavating the necessary depth for boring, backfilling, and repaving the street to City of Corona standards (SCE, 2018j). The overhead segments of the telecommunication line would be installed on 39 existing wood distribution poles primarily along East 3rd Street, Quarry Street, and West 2nd.

The third sentence in Draft EIR project alternatives Section 3.4.4.1, Alternative D1: 12 kV Distribution-Level Battery Storage, has been revised to clarify that the total energy capacity would be approximately 24 MWh, as opposed to the each of the facilities having a capacity of 24 MWh.

Based on analysis conducted by SCE, a 10 MW battery storage facility (referred to as Option 2A by SCE), comprised of two 5 MW installations (with a corresponding total energy capacity of approximately 24 megawatt hours (MWh)) that would be connected to two existing distribution circuits near the site, would be sufficient to satisfy the Project's Distribution Service Objective.

The following footnote and sentence has been added to the end of the first paragraph in Draft EIR Section 3.4.4.1, Alternative D1: 12 kV Distribution-Level Battery Storage, to clarify that phase 1 of the Alternative D1 battery storage facility would be scheduled to commence operation by 2021 and to reflect new information relative to SCE's 2018 through 2027 power flow forecast (see text revisions to Chapter 1, Introduction), respectively.

SCE's analysis found that a 15 MW battery storage facility would defer the need for the proposed substation until 2029, and a 20 MW battery storage facility would defer the need until 2031.² Based on new information relative to SCE's 2018 through 2027 power flow forecast, the battery storage facility for the various MW sizes may defer the need 1 year prior to the years identified above; therefore, the 20 MW facility may defer the need for a substation to 2030.

² Installation of phase 1 for operation by 2021 would allow SCE to operate the battery storage installation for several years in advance of the projected capacity shortfall in 2024. This would provide SCE the opportunity to gain operational experience with the battery installation and to evaluate its performance under a variety of system conditions prior to the anticipated capacity shortfall addressed by the batteries.

The fourth paragraph of Draft EIR project alternatives Section 3.4.4.1 has been revised as shown below acknowledge that a wall would be installed to secure the Alternative D1 site.

The Alternative D1 battery storage facility site would be immediately northwest of and adjacent to the proposed Circle City Substation site on the same property along Leeson Lane (refer to **Figure 3-3, Alternative D1: 12 kV Distribution-Level Battery Storage Conceptual Layout**). The ~~fenced~~-walled area of the site would be up to 2 acres. The batteries would be contained in up to ten pad mounted 53-foot by 8-foot enclosures that would be 9 feet and 7 inches tall (plus a 2-foot pedestal) organized in four battery storage systems on the site. Battery Storage Systems 1 and 2 would be on the west side of the site and Battery Storage Systems 3 and 4 would be on the east side of the site. Each battery storage system would have two to three battery storage enclosures, a 12-foot-tall pad-mounted inverter, 6-foot 10-inch pad-mounted transformers, 9-foot-tall switchgear, a 6-foot 10-inch communications cabinet, and an auxiliary panel (refer to **Figure 3-4, Alternative D1: 12 kV Distribution-Level Battery Storage Alternative Conceptual Plot Plan**). The site would be accessed by a 26-foot-wide driveway from Leeson Lane that would enter the site from the northeast. The site would be secured with an at least 8-foot-

high ~~chain-link fence~~ tan-colored wall similar to that SCE has proposed for the Circle City Substation site and 26-foot-wide sliding gate for driveway access.

Draft EIR Figure 3-3 has been updated as shown on the following page to identify the second telecommunication alignment for Alternative D1.

To be consistent with SCE's new description of the required telecommunication facilities for Alternative D1, the first paragraph of the Telecommunication Connection discussion in Draft EIR project alternatives Section 3.4.4.1 has been revised as shown below.

Alternative D1 would require installation of ~~a two~~ two new telecommunication lines to connect the battery storage facilities to SCE's existing telecommunication system. The first new telecommunication line would be along Magnolia Avenue and would tap the battery storage facility to the existing Corona-Jefferson fiber line. The proposed 5,500-foot telecommunication line (referred to here as the Battery Storage Tap to Corona-Jefferson fiber route) would consist of approximately 2,500 feet of new underground conduit and approximately 3,000 feet in existing underground conduit. The second telecommunication line would be 18,000 feet long and would consist of approximately 5,200 feet of new underground conduit, approximately 5,000 feet of new fiber placed in existing underground conduit, and approximately 7,800 feet of the line would be attached to existing distribution poles. This second line would be the same as the Circle City Substation to Corona Substation telecommunication line described for Alternative E4. See Section 3.4.5.4, Alternative E4: Databank 66 kV Source Lines Only, for a detailed description of this line. Refer to Figure 3-3 for an illustration of Alternative D1's Battery Storage Tap to Corona-Jefferson and Battery Storage Tap to Corona Substation fiber routes. The figure also shows where the new underground conduit installations would be required and where the line would be installed within existing underground conduit.

Draft EIR Figure 3-6 has been updated as shown on the following page to correct a typographic error and to accurately reflect the fiber alignments for the source line and substation alternatives.

The first sentence in the third paragraph of the Telecommunication Connection discussion in Draft EIR project alternatives Section 3.4.5.4 has been revised as follows to show the correct spelling of Leeson Lane.

The new conduit would exit the substation on ~~Lesson~~ Leeson Lane, turn north on Magnolia Avenue, and then west on East 6th Street to a location west of El Camino Avenue and the railroad.

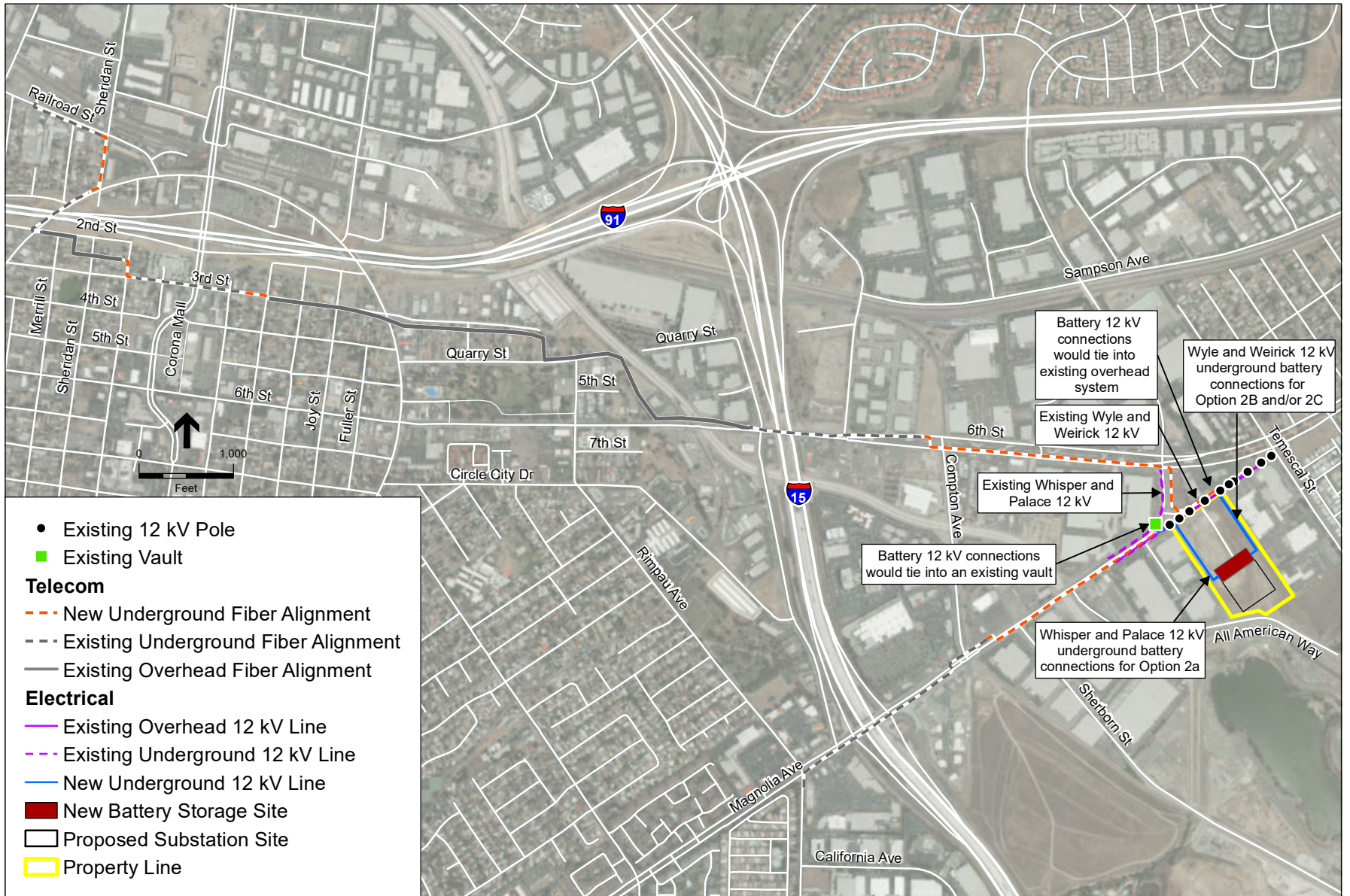
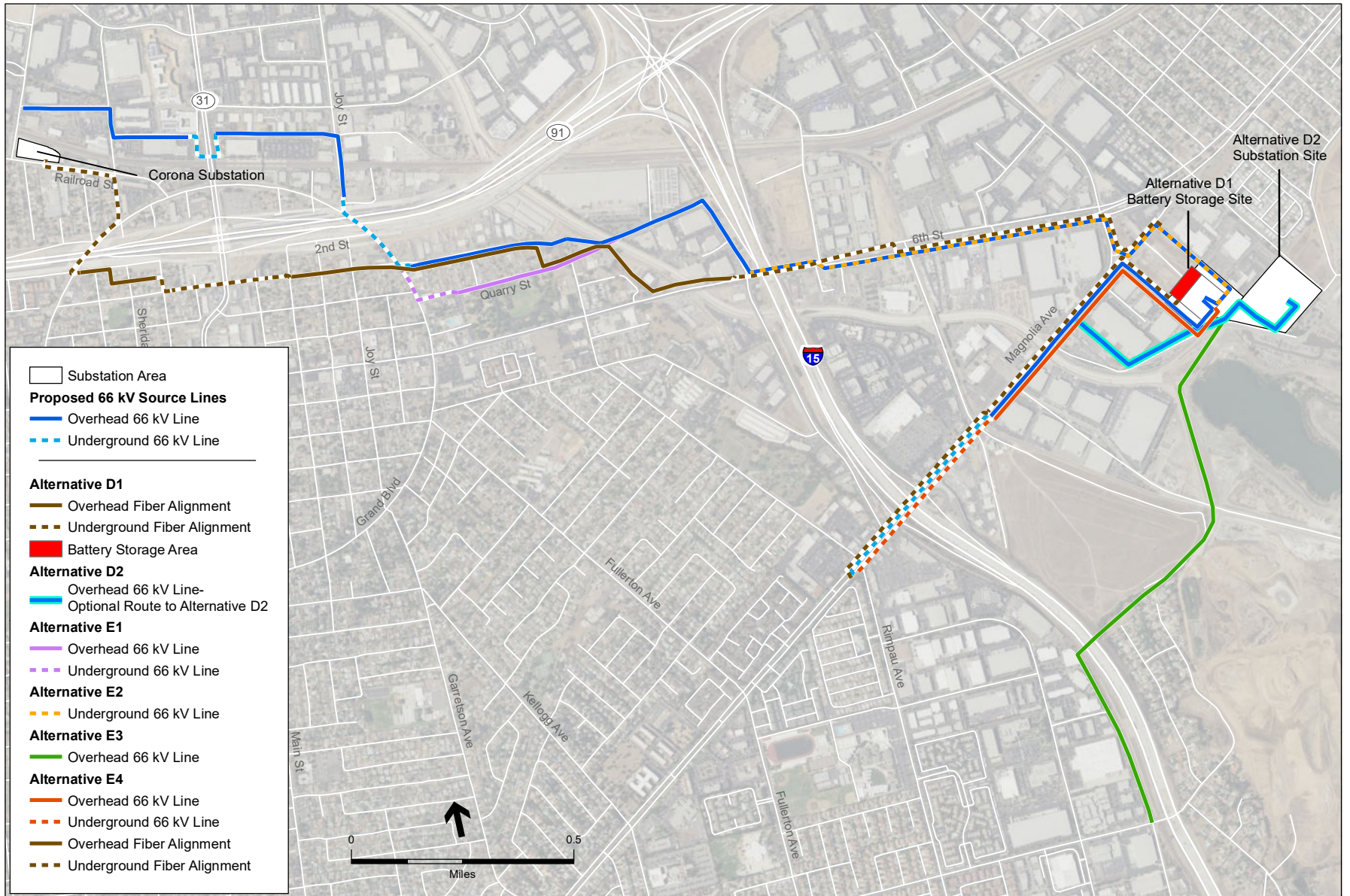


Figure 3-3
Alternative D1: 12 kV Distribution-Level Battery Storage Conceptual Layout



SOURCE: SCE, 2015 and 2018

Circle City Substation and Mira Loma-Jefferson 66 kV Line Project . 207584

Figure 3-6
66 kV Source Line and Substation Alternatives

Section 4.1, Aesthetics

Draft EIR Table 4.1-1, second row, second column has been revised as follows.

Portion ~~west-east~~ of I-15 is an Eligible State Scenic Highway within San Bernardino and Riverside counties.

The second to last sentence of the first paragraph in the Circle City Substation (Photographs 1 through 6) discussion in Draft EIR aesthetics Section 4.1.1.2, Existing Visual Quality of the Region, has been revised as follows to correctly refer to the line as a distribution line.

An open field with stockpiled soil and oak trees can be seen in the middleground along with an existing distribution-~~subtransmission~~ line.

The first sentence of the fifth paragraph of the Mira Loma-Jefferson 66 kV Subtransmission Line (Photographs 21 through 38) discussion in Draft EIR aesthetics Section 4.1.1.2, Existing Visual Quality of the Region, has been revised as follows to correctly note the local jurisdictions along the proposed alignment.

The proposed subtransmission line would then extend north for approximately ~~5-2~~ miles along the ~~western-eastern~~ edge of ~~suburban residential areas in the City of Eastvale-Chino,~~ and travel north along Hellman Avenue through a mixture of open, agricultural areas and single-family residential neighborhoods before crossing back to the western edge of the City of Corona, as shown in Photographs 30, 31, and 32 (see **Figures 4.1-4o** and **4.1-4p**).

The following sentence was added to the end of the first paragraph of the Alternative C3 aesthetics impact analysis discussion in Draft EIR Section 4.1.5.2, Subtransmission Service Objectives Alternatives, to include consideration of the telecommunication lines.

Visual impacts associated with the Alternative C3 telecommunication lines would result in similar or reduced impacts as discussed above for the 66 kV connection lines because the lines would be installed on the new 66 kV connection line poles, in new underground alignments, and on existing poles.

The last two sentences in the last paragraph of the Alternative D1: 12 kV Distribution-Level Battery Storage discussion in Draft EIR aesthetics Section 4.1.5.3, Distribution Service Objectives Alternatives, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Alternative D1's Battery Storage Tap to Corona-Jefferson telecommunication line would be installed completely underground, resulting in no long-term visual impacts (No Impact). Alternative D1's Battery Storage Tap to Corona Substation telecommunication line would be constructed mostly underground, but approximately 7,800 feet of the line would be aboveground, attached to existing distribution poles. The overhead line attached to existing distribution poles would result in a less-than-significant impact (Impact 4.1-3; Class III). Significant and unavoidable visual impacts related to the proposed Mira Loma-

Jefferson subtransmission line or the facilities under Alternative C3 could still occur under this scenario, depending on the combination of alternatives selected.

Section 4.2, Agricultural and Forestry Resources

No text revisions have been made to Section 4.2, *Agriculture and Forestry Resources*.

Section 4.3, Air Quality

The fifth sentence of the third paragraph of Draft EIR air quality Section 4.3.1.5, Sensitive Receptors, has been revised as follows to show the unit of measure for the number 500.

With regard to Alternative C3 (Subtransmission-Level Battery Storage), the 50 MW subtransmission-level battery storage facility would be located approximately 270 feet east-northeast of the Christian Heritage School and approximately 50 feet south of residences along Pleasant View Avenue; the 42 MW subtransmission-level battery storage facility would be located approximately 500 feet southwest of the closest building associated with Corona High School and approximately 50 feet north, east, and west of residence along Fairmont Drive, Border Avenue, and Zircon Street, respectively.

The first sentence of the third paragraph in the Draft EIR air quality Impact 4.3-1 discussion has been revised as follows to reference the correct impact number.

As described under Impacts 4.3-2, ~~4.6-3~~, ~~4.6-4~~, and 4.3-6, the Project would result in significant impacts associated with construction emissions of criteria pollutants.

The first sentence of the third bullet of air quality Mitigation Measure 4.3-2a has been revised as follows to clarify that dust stabilization monitoring would be conducted by a third party hired by SCE, not by the South Coast Air Quality Management District.

Graded and/or excavated inactive areas of the construction site shall be monitored by ~~SCAQMD air district or approved~~ a third party hired by SCE at least weekly for dust stabilization.

The sixth bullet in air quality Mitigation Measure 4.3-2a, Fugitive Dust Controls, has been revised as follows to allow for an effective option to reduce fugitive dust emissions associated with loose-material hauling for trucks that are not designed to be tarped.

All trucks hauling dirt, sand, or other loose materials are to be tarped with a fabric cover, with the exception of trucks that are not designed to be tarped, such as belly dumps, and maintain a freeboard height of at least 12 inches. Water shall be applied to the truck loads hauling dirt, sand, or other loose materials that are not designed to be tarped prior to leaving the site;

Mitigation Measure 4.3-2b has been revised as follows to allow for flexibility in the event that SCE is not able to identify each piece of equipment 30 days before commencement of construction activities due to unforeseeable construction equipment availability, while retaining the intent of the mitigation measure.

Mitigation Measure 4.3-2b: Construction Equipment Exhaust Reductions. For all diesel-fueled off-road construction equipment, SCE shall make a good faith effort to use available construction equipment that meets Tier 4, the highest USEPA-certified tiered emission standard. An Exhaust Emissions Control Plan that identifies each off-road unit's certified tier specification and Best Available Control Technology (BACT) shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities. Construction activities cannot commence until the Plan has been approved. For all pieces of equipment that would not meet Tier 4 emission standards, the Exhaust Emissions Control Plan shall include recent documentation from at least two local heavy construction equipment rental companies that indicates that the companies do not have access to higher-tiered equipment for the given class of equipment.

In the event that SCE is not able to identify each piece of equipment 30 days before commencement of construction activities due to unforeseeable construction equipment availability, SCE shall maintain an equipment log that lists the equipment identification number, certified tier and BACT specification, California Air Resources Board (CARB) or South Coast Air Quality Management District (SCAQMD) operating permit specifications, and documents availability of Tier 4 equipment from rental companies, as applicable, for each piece of diesel-fueled off-road construction equipment that is not identified in the Exhaust Emissions Control Plan due to unforeseeable availability issues. The log shall be submitted to the CPUC for review and approval at least 1 week before the commencement of construction activities. Construction shall not commence until SCE confirms that all diesel equipment are included in the Exhaust Emissions Control Plan or until CPUC approves the equipment log. An updated log shall be submitted to the CPUC at least 2 days prior to when any new equipment is brought to or removed from a project work site. New equipment cannot operate at the site until the updated equipment log has been approved by the CPUC.

The following sentences in the seventh paragraph of the Alternative C3 air quality impact analysis discussion in Draft EIR Section 4.3.5.2, Subtransmission Service Objectives Alternatives, have been revised to include consideration of the telecommunication lines:

Construction along new subtransmission line and telecommunication line alignments would proceed at a linear pace and would not be expected to expose any one receptor along the corridors for longer than 2 to 3 weeks. The total emissions and duration of exposure at any one sensitive receptor location for the subtransmission line or telecommunication line construction would be relatively minor compared to the exposure periods used in health risk assessments.

The Threshold Exceeded row of the VOC column in Draft EIR air quality Table 4.3-10, Alternative D1 Peak Construction Emissions, has been changed from “Yes” to “No” to accurately reflect the impact determination relative to volatile organic compounds.

Section 4.4, Biological Resources

The second sentence of the Freshwater Marsh discussion in Draft EIR biological resources Section 4.4.1.2, Natural Communities and Wildlife Habitat, has been revised as follows to correctly state the associated alternative name.

Two patches of freshwater marsh occur within the study area—one along the proposed Mira Loma-Jefferson subtransmission line routes in the Prado Flood Control Basin and one along the Alternative E3 ~~alternative source line~~ corridors around the quarry lake.

The first sentence of the second paragraph in Draft EIR biological resources Section 4.4.1.7, *Wildlife Movement*, has been revised as shown below to use the correct alternative names.

Portions of the proposed Circle City Substation site, ~~the Substation Site~~ Alternative D2, and ~~the Source Route~~ Alternative E3 occur within the MSHCP Proposed Constrained Linkage 4.

Draft EIR biological resources Mitigation Measure 4.4-3b has been revised as follows.

Mitigation Measure 4.4-3b: If vernal pool fairy shrimp or Riverside fairy shrimp are identified in the Project area and impacts to occupied pools cannot be avoided, SCE shall mitigate for impacts to vernal pool fairy shrimp habitat and comply with the requirements of the FESA through one or more of the following steps to provide compensatory habitat: (a) participation in the MSHCP to obtain take coverage for identified species, (b) salvage of cysts and creation of replacement pool habitat in the local area at a replacement ratio of at least 3:1, (c) restoration of affected pools onsite after the completion of construction, or (d) acquisition of credits from an approved mitigation bank within the Project region.

If occupied habitat for the above species is encountered at a Project site, to mitigate for temporary or permanent loss of aquatic sites, SCE shall implement the following measures:

Habitat Compensation or Restoration

- SCE shall mitigate for the loss of branchiopod habitat that will be filled or otherwise directly affected by the project by providing compensatory habitat; or,
- SCE shall develop and implement a mitigation, monitoring, and management plan, with input from regulatory agencies that shall outline long-term management strategies and performance standards to be attained to compensate for habitat losses resulting from the project. At a minimum, the plan shall include standards for mitigation site selection and construction specifications for mitigation sites, a description of site conditions including aerial maps, an analysis of local branchiopod habitat, and performance criteria by which site quality can be assessed over time (e.g., size, vegetation species present, date of initial ponding, ponding duration, and wildlife usage). A monitoring program will be established to track the development of habitat conditions that are conducive to the establishment of vernal pool branchiopods.
- To the greatest practicable extent, SCE or its contractors shall construct compensation habitat (i.e., replacement pools) before habitat disturbances are incurred; or directly within the project footprint after construction. A qualified biologist shall ensure that ponds are functioning as designed.

Species Protection During Construction

- SCE shall submit the name and credentials of a biologist qualified to act as construction monitor to USFWS for approval at least 15 days before construction work begins.
- If restoration is proposed to compensate for habitat loss, wWith concurrence from the USFWS, a USFWS-approved biologist shall salvage soils from sites that are known to support vernal pool branchiopods at least 2 weeks before the onset of construction, or during the preceding dry season if pools are anticipated to hold water when construction begins. The salvaged soil samples will be stored and used to inoculate created pools once minimum performance standards are met at these locations.
- A USFWS-approved biologist shall be present at each active work site within 0.5-mile of potential fairy shrimp habitat until habitat disturbance has been completed. Thereafter, the contractor or SCE shall designate a person to monitor onsite compliance with all minimization measures. A USFWS-approved biologist shall ensure that this individual receives training consistent with USFWS requirements.
- A USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of fairy shrimp and their habitat, the importance of these species and their habitat, the general measures that are being implemented to conserve fairy shrimp as they relate to the project, and the boundaries within which the project construction shall occur.
- All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 100 feet from any fairy shrimp habitat.

The fifth paragraph of Draft EIR biological resources Impact 4.4-5 has been revised as follows:

The Project area overlaps designated critical habitat for the least Bell's vireo and proposed critical habitat for western yellow-billed cuckoo in both Riverside County and San Bernardino County. Construction in San Bernardino County would occur within developed roadways along Hellman Avenue and not within suitable habitat for least Bell's vireo or western yellow-billed cuckoo. Impacts to critical habitat within San Bernardino County are unlikely since the Project alignments avoid riparian vegetation, and poles and other structures are placed within developed areas. However, if placement of structures causes the loss or modification of habitat with critical habitat features, coordination with the USFWS may be required. Construction that is either adjacent to or in critical habitat in the Prado Flood Control Basin in Riverside County would consist of new LWS poles, hybrid H-frames, and conductor pulling sites. Construction and removal of these structures would occur within the Santa Ana River corridor, in suitable habitat for least Bell's vireo and western yellow-billed cuckoo.

Draft EIR biological resources Mitigation Measure 4.4-9a has been revised as follows.

Mitigation Measure 4.4-9a: Should SCE opt to participate in the MSHCP, aApply Restoration Planning Methodology identified in Mitigation Measure 4.4-5c to Non-riparian Special-status Vegetation that is not fully covered in the MSHCP,~~which includes Riversidean Sage Scrub.~~

The first paragraph of Mitigation Measure 4.4-12 has been revised as follows.

Mitigation Measure 4.4-12: SCE shall ensure that a preconstruction survey for roosting bats shall be conducted by a qualified biologist prior to construction activities to characterize potential bat habitat and identify active roost sites. Surveys shall be conducted within 100 feet of construction activities. If an active bat roost being used for maternity is found within 100 feet of the construction activities, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active maternity roosts by the qualified biologist. Should potential roosting habitat or active non-maternity bat roosts be found in trees to be removed or trimmed or poles to be replaced under the Project, SCE shall implement the following measures:

The following sentence in the seventh paragraph of the Alternative C3 biological resources impact analysis discussion in Draft EIR Section 4.4.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

Alternative C3 includes three proposed subtransmission-level battery storage and substation locations, new subtransmission lines, telecommunication lines, and line reconductoring that was not included in the Project analysis.

The seventh sentence in the Alternative D1: 12 kV Distribution-Level Battery Storage discussion in Draft EIR biological resources Section 4.4.5.3, Distribution Service Objectives Alternatives, has been revised as follows to reflect the second telecommunication lines required for Alternative D1.

The construction of distribution connections on Leeson Lane and the telecommunication connections along Magnolia Avenue, 2nd Street, 6th Street, etc., would occur within urban alignments where protected trees, nesting birds, or roosting bats may be encountered.

Section 4.5, Cultural Resources

The following revisions have been made to Mitigation Measure 4.5-1 to clarify that a Cultural Resources Management Plan would be developed and implemented to manage project-related construction activities within the Grand Boulevard Historic District. The revisions also reflect other requirements associated with unanticipated discovery of archaeological resources, including human remains.

Mitigation Measure 4.5-1: ~~Prior to commencing Project-related construction activities associated with the Pedley Source Lines or the Alternative E4 telecommunication line, an architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards for Architectural History shall assist Project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444) located in or adjacent to the Project Area—these contributing elements to the District shall subsequently be avoided during Project implementation.~~

SCE shall prepare a Cultural Resource Management Plan (CRMP) to guide all cultural resource management activities during project construction. Management of cultural resources shall follow the State standards and guidelines established in Public Resources

Code (PRC) Sections 21083.2 and 21084.1 through 21084.3, as well as CEQA Guidelines Section 15064.5 and Appendix G. The CRMP shall be submitted to the CPUC for review and approval at least 30 days prior to the start of construction. The CRMP shall require, but not be limited to, the following:

1. *Construction Plan Review/Markup:* An architectural historian meeting the Secretary of the Interior’s Professional Qualifications Standards for Architectural History shall assist project engineers in identifying and labeling for avoidance on construction plans all contributing elements of the Grand Boulevard Historic District (P-33-006444) located in or adjacent to the project construction area.
2. *Cultural Resource Monitoring and Field Reporting:* Detailed procedures shall be followed for archaeological monitoring and reporting, and for determining when monitoring is no longer necessary. Such procedures shall include, but not necessarily be limited to: archaeological monitoring – the monitor shall meet the Secretary of the Interior’s Professional Qualifications for Archeology, mapping of areas to be monitored (i.e., areas of moderate potential for archaeological resources that are in previously undisturbed sediment), and implementation of Unanticipated Discovery Protocol in the event of any identified archaeological deposits, including human remains and potential tribal cultural resources (see below); determining when monitoring is no longer necessary – confirmation that ground-disturbing work is complete in areas of moderate potential for archaeological resources that are in previously undisturbed sediment before the determination is made that monitoring is complete; reporting – submission of an archaeological monitoring report to the CPUC upon completion of construction monitoring and subsequent submission to the California Historical Resources Information System (CHRIS) upon approval by the CPUC.
3. *Unanticipated Discovery Protocol:* Detailed procedures for halting construction, defining work stoppage zones, notifying stakeholders (e.g. agencies, Native American tribes, utilities), and assessing California Register-eligibility of cultural resources, including human remains and potential tribal cultural resources in the event that any such resources are encountered during construction. Such procedures shall include, but not necessarily be limited to the following:
 - a. If prehistoric or historic-era archaeological resources are encountered during construction, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance.
 - b. The CPUC shall be immediately informed of the discovery.
 - c. A qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior’s Professional Qualifications Standards for Archeology, shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment.
 - d. If human remains are uncovered during construction, SCE and/or its contractors shall immediately halt all work within 100 feet of the discovery, contact the appropriate county coroner to evaluate the remains, and follow the procedures and protocols set forth in CEQA Guidelines Section 15064.5 (e)(1). If the county coroner determines that the remains are Native American, the county coroner shall contact the NAHC within 24 hours, in accordance with California Health and Safety Code Section 7050.5(c), and PRC Section 5097.98 (as amended by Assembly Bill 2641). SCE shall ensure that the immediate vicinity, according to

generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further construction activities until SCE and the CPUC have discussed and conferred, as prescribed in PRC Section 5097.98, with the most likely descendants regarding their recommendations for treatment of the human remains, including, if applicable, taking into account the possibility of multiple human remains.

- e. If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC § 21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.
4. Treatment Measures: If avoidance of a resource that may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC § 21074), is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American-related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). Treatment shall include documentation of the resource and may include data recovery or other measures. Treatment for most resources would consist of (but not necessarily be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the resource. The CRMP shall detail methods for data recovery, including analysis in a regional context, reporting of results within 1 year of completion of field studies, curation of artifacts and data (e.g., maps, field notes, archival materials, recordings, reports, photographs, and analysts' data) at a facility that is approved by the CPUC, and dissemination of reports to appropriate repositories, including the CHRIS.

As described above, Mitigation Measure 4.5-1 has been revised to cover the intent of Mitigation Measure 4.5-2. Therefore, the Draft EIR cultural resources Impact 4.5-2 discussion has been revised as follows and Mitigation Measure 4.5-2 is no longer needed and has been removed.

Such significant impacts would be reduced to a less-than-significant level by implementing Mitigation Measure 4.5-2~~1~~, which would require, in the event of an inadvertent discovery of archaeological resources, a qualified archaeologist to assess any previously undiscovered archaeological resources and, if determined to potentially be an historical resource, avoid the resource if feasible, or, if avoidance is not feasible, consult with Native American tribes (if the resource is Native American-related) and determine treatment measures, which may include conducting data recovery of the resource. The potential impact to previously undiscovered historical resources, and the associated Mitigation Measure 4.5-2~~1~~, applies to all components of the proposed Project.

Mitigation: Implement Mitigation Measure 4.5-1 (see above).

~~**Mitigation Measure 4.5-2:** If prehistoric or historic era archaeological resources are encountered during Project implementation, SCE and/or its contractors shall immediately cease all construction activity within 100 feet of the find and flag off the area for avoidance. The CPUC and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior's Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the find within 24 hours of discovery and notify the CPUC of their initial assessment. Prehistoric archaeological materials might include obsidian and chert flaked stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic era materials might include building or structure footings and walls, and deposits of metal, glass, and/or ceramic refuse.~~

~~If the CPUC determines, based on recommendations from the qualified archaeologist, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines §15064.5), or a tribal cultural resource (as defined in PRC §21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones.~~

~~If avoidance is not feasible, the CPUC shall consult with appropriate Native American tribes (if the resource is Native American related), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4(b). This shall include documentation of the resource and may include data recovery or other measures. Any treatment other than preservation in place must be approved by the CPUC and the appropriate tribe if applicable. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource. The resource and treatment method shall be documented in a professional level technical report to be filed with the California Historical Resources Information System (CHRIS). Work in the area may commence upon completion of approved treatment and under the direction of the qualified archaeologist.~~

As described above, Mitigation Measure 4.5-1 has been revised to cover the intent of Mitigation Measure 4.5-2. Therefore, the last paragraph of the Draft EIR cultural resources Impact 4.5-3 discussion has been revised as follows.

Implementation of Mitigation Measure 4.5-2~~1~~, which would require a qualified archaeologist to enact recovery measures in the event of an inadvertent discovery of archaeological resources, would reduce the impact to archaeological resources to less than significant.

Mitigation: Implement Mitigation Measure 4.5-2~~1~~ (see above).

Mitigation Measure 4.5-1 has been revised to cover the intent of Mitigation Measure 4.5-5. Therefore, the last sentence of the first paragraph of the Draft EIR cultural resources Impact 4.5-3 discussion has been revised as follows, and Mitigation Measure 4.5-5 has been replaced with a reference to Mitigation Measure 4.5-1 as shown below.

Such impacts would be reduced to a less-than-significant level by implementing Mitigation Measure 4.5-~~5~~1, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered.

~~**Mitigation Measure 4.5-5:** If human remains are uncovered during Project construction, SCE and/or its contractors shall immediately halt all work, contact the appropriate county coroner to evaluate the remains, and follow the procedures and protocols set forth in CEQA Guidelines Section 15064.5 (e)(1). If the county coroner determines that the remains are Native American, SCE and/or its contractors shall contact the NAHC, in accordance with HSC Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641). Per PRC Section 5097.98, SCE shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until SCE and/or its contractor has discussed and conferred, as prescribed in this section (PRC §5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. Implement Mitigation Measure 4.5-1 (see above).~~

Mitigation Measure 4.5-1 has been revised to cover the intent of Mitigation Measures 4.5-2 and 4.5-5. Therefore, the last sentence of the Draft EIR cultural resources Impact 4.5-6 discussion has been revised as follows, and the applicable mitigation has been revised to show Mitigation Measure 4.5-1 as shown below.

Impacts would be reduced to less-than-significant levels with implementation of Mitigation Measures 4.5-~~2~~1 and 4.5-5 (see discussions for Impacts 4.5-2 and 4.5-5, above).

Mitigation: Implement Mitigation Measures 4.5-~~2~~1 and 4.5-5.

The beginning of the second sentence in the third paragraph of the Alternative B cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2, Subtransmission Service Objectives Alternatives, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~2~~1, which would require, ...

The last sentence in the fifth paragraph of the Alternative B cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~5~~1, which would require construction workers in the area to

cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative B cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-2~~1~~ and 4.5-5 (Impact 4.5-6; Class II).

The beginning of the second sentence in the third paragraph of the Alternative C1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2, Subtransmission Service Objectives Alternatives, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-2~~1~~, which would require, ...

The last sentence in the fifth paragraph of the Alternative C1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-5~~1~~, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative C1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-2~~1~~ and 4.5-5 (Impact 4.5-6; Class II).

The beginning of the second sentence in the third paragraph of the Alternative C2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2, Subtransmission Service Objectives Alternatives, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-2~~1~~, which would require, ...

The last sentence in the fifth paragraph of the Alternative C2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-5~~1~~, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative C2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-2~~1~~ and 4.5-5 (Impact 4.5-6; Class II).

The second paragraph of the Alternative C3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

Archival review indicates that no previously documented architectural resources are located within or adjacent to the footprint of the Alternative C3 sites. Due to the developed and urban nature of the Alternative C3 surroundings, the addition of the proposed substations, ~~and~~ transmission lines, and telecommunication lines would not result in any direct or indirect impacts to architectural resources. The telecommunication lines for the Alternative C3 40 MW facility would ~~does not include any~~ construction, operation, or maintenance-related activities in ~~or in the immediate vicinity of~~ the Grand Boulevard Historic District (P-33-006444); and however, since Alternative C3 may include construction of the proposed Pedley Source Lines, it could result in the same impact to the Grand Boulevard Historic District (P-33-006444), an historical resource, as the proposed Project (Impact 4.5-1; Class II).

The fourth sentence in the third paragraph of the Alternative C3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2, Subtransmission Service Objectives Alternatives, has been revised as follows to reference the correct mitigation measures.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measures 4.5-2a and 4.5-2~~1~~ (Impacts 4.5-2 and 4.5-3; Class II).

The last sentence in the third paragraph of the Alternative C3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2, has been revised as follows to reference the correct mitigation measure.

Mitigation Measure 4.5-2~~1~~ would require, in the event of an inadvertent discovery of archaeological resources, a qualified archaeologist to assess any previously undiscovered archaeological resources and, if determined to potentially be an historical resource or unique archaeological resource, avoid the resource if feasible, or, if avoidance is not feasible, consult with Native American tribes (if the resource is Native American-related) and determine treatment measures, which may include conducting data recovery of the resource.

The third sentence in the fifth paragraph of the Alternative C3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant level by implementing Mitigation Measures 4.5-2a and 4.5-5~~1~~ (Impact 4.5-5; Class II).

The last sentence in the fifth paragraph of the Alternative C3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Mitigation Measure 4.5-5~~1~~ would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered.

The last sentence in the Alternative C3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.2 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-2a; and 4.5-1 ~~4.5-2, and 4.5-5~~ (Impact 4.5-6; Class II).

The following revisions have been made to the second paragraph under the Draft EIR cultural resources impact discussion in Draft EIR Section 4.5.6.3, Distribution Service Objective Alternatives, for Alternative D1.

~~In contrast to the proposed Project, Alternative D1 would not impact the Grand Boulevard Historic District (P-33-006444), an historical resource. Alternative D1 does not include any construction, operation, or maintenance related activities in or in the immediate vicinity of the District. Therefore, under Alternative D1, Impact 4.5-1 would be less than significant, and no mitigation would be required. Alternative D1 has the potential to impact the Grand Boulevard Historic District (P-33-006444), an historical resource, as defined in CEQA Guidelines Section 15064.5. This potential impact would result from the Alternative D1 telecommunications line, which would include the addition of overhead telecommunication lines on 39 existing wood distribution poles primarily along East 3rd Street, Quarry Street, West 2nd Street, and W Grand Boulevard. The telecommunications line would not result in the addition of a new visual change to the historic setting of the District; therefore, no resulting indirect visual impacts to the District would occur. However, the majority of the underground construction component of the telecommunications line would involve installation within an existing underground duct bank system in Grand Boulevard and West 3rd Street, including 1,300 feet of new underground duct bank required within the District. This underground component of the Alternative D1 telecommunications line would result in similar potential impacts to sidewalks, curbs and gutters, and historic period landscaping and trees associated with the District as those for the proposed Project. These potential impacts could still result in a substantial adverse change to the significance of the District, a significant impact that would be reduced to a less-than significant level through implementation of Mitigation Measure 4.5-1 (Impact 4.5-1; Class II).~~

The beginning of the third sentence in the third paragraph of the Alternative D1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-2~~1~~, which would require, ...

The last sentence in the fifth paragraph of the Alternative D1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~5~~1, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative D1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-~~2~~1 and 4.5-~~5~~ (Impact 4.5-6; Class II).

The beginning of the third sentence in the third paragraph of the Alternative D2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~2~~1, which would require, ...

The last sentence in the fifth paragraph of the Alternative D2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~5~~1, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative D2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-~~2~~1 and 4.5-~~5~~ (Impact 4.5-6; Class II).

The beginning of the third sentence in the fourth paragraph of the Alternative E1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~2~~1, which would require, ...

The last sentence in the sixth paragraph of the Alternative E1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~5~~1, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative E1 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-~~2~~1 and 4.5-~~5~~ (Impact 4.5-6; Class II).

The beginning of the third sentence in the third paragraph of the Alternative E2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~2~~1, which would require, ...

The last sentence in the fifth paragraph of the Alternative E2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~5~~1, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative E2 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-~~2~~1 and 4.5-~~5~~ (Impact 4.5-6; Class II).

The beginning of the third sentence in the third paragraph of the Alternative E3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~2~~1, which would require, ...

The last sentence in the fifth paragraph of the Alternative E3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~5~~1, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative E3 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-~~2~~1 and 4.5-~~5~~ (Impact 4.5-6; Class II).

The beginning of the third sentence in the third paragraph of the Alternative E4 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3, has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~2~~1, which would require, ...

The last sentence in the fifth paragraph of the Alternative E4 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to less-than-significant levels by implementing Mitigation Measure 4.5-~~5~~1, which would require construction workers in the area to cease work and follow appropriate State law if human remains are discovered (Impact 4.5-5; Class II).

The last sentence in the Alternative E4 cultural resources impact analysis discussion in Draft EIR Section 4.5.6.3 has been revised as follows to reference the correct mitigation measure.

Significant impacts would be reduced to a less-than-significant levels with implementation of Mitigation Measures 4.5-~~2~~1 and 4.5-~~5~~ (Impact 4.5-6; Class II).

Section 4.6, Energy Conservation

The first sentence of the Alternative C3 energy conservation impact analysis discussion in Draft EIR Section 4.6.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

Under Alternative C3, up to three subtransmission-level (66 kV) battery storage and substation facilities, associated subtransmission and telecommunication lines, and upgrades to existing Jefferson Substation, would be constructed and operated instead of the Mira Loma-Jefferson 66 kV line component of the Project.

Section 4.7, Geology and Soils

The following sentence in the second paragraph of Draft EIR geology and soils Section 4.7.1.1, Regional Geology, has been revised as follows to clarify the nature of geologic conditions at the Circle City Substation site.

The Circle City Substation site is underlain by a thin mantle of un-compacted fill overlying young alluvial channel deposits of the Temescal Wash, which range from fine grained mixtures of silt, sand, and some gravel, to coarse granular alluvium containing sand, gravel, cobbles and boulders mixtures (TDBU, 2012).

The following sentence in the first paragraph in Draft EIR geology and soils Section 4.7.1.2, Faults, has been revised as follows to clarify what is shown in Figure 4.7-1.

Figure 4.7-1 provides an illustration of the major mapped earthquake faults in the area of the proposed Project.

The title of Draft EIR Figure 4.7-1 has been revised as shown on the following page to “Earthquake Faults and Hazard Zones in the Project Vicinity” in response to this comment.

The first sentence in Draft EIR Section 4.7.1.3, Soils, has been revised as follows.

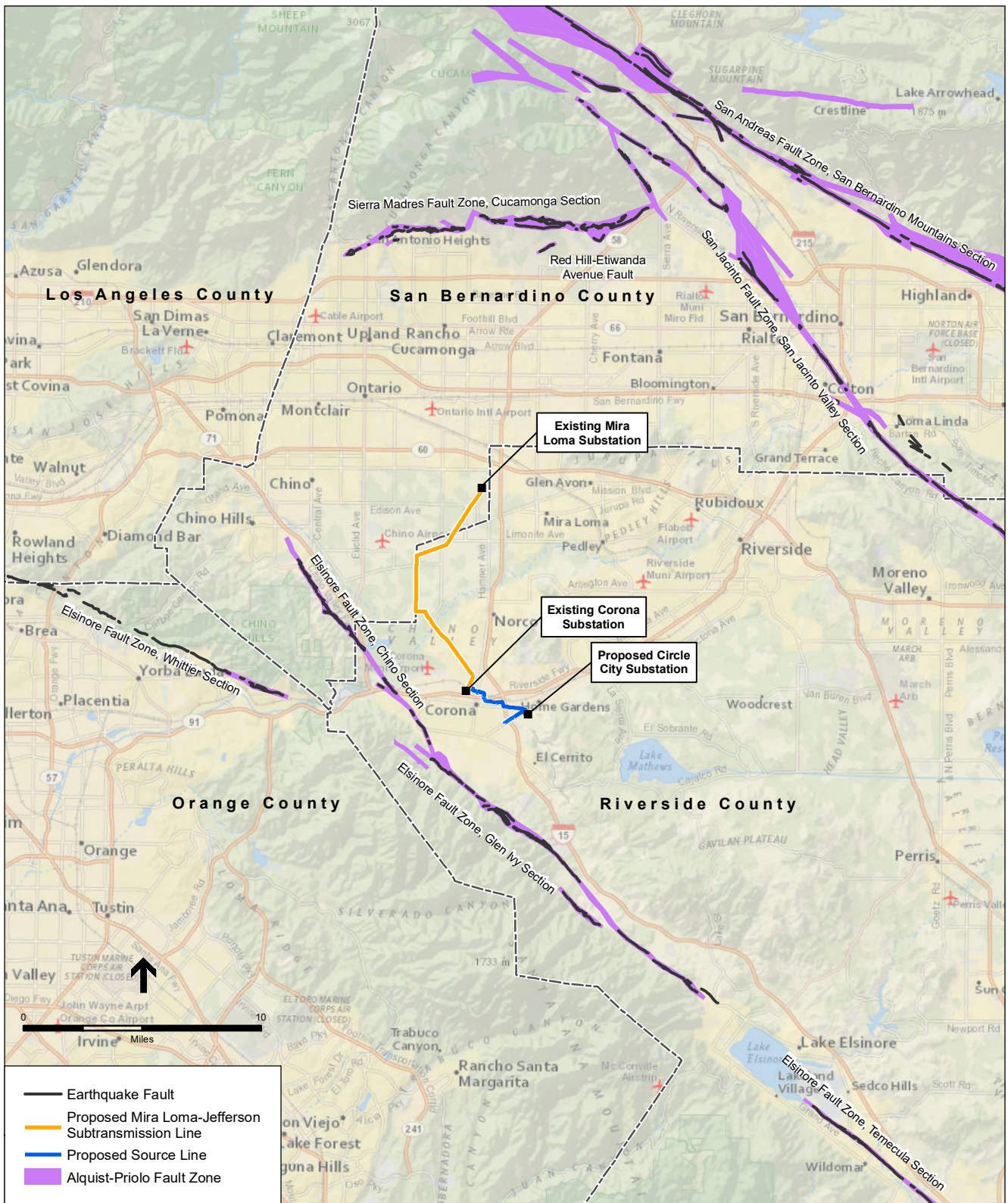
Soils overlie ~~Overlying~~ the geologic units described in Section 4.7.1.1, *Regional Geology*, within the Project area ~~above is a layer of soil.~~

The fourth paragraph in Draft EIR geology and soils Section 4.7.1.3, Soils, has been revised as follows.

Detailed soil information was collected at the Circle City Substation site during a geotechnical investigation conducted for the Project. It was determined that the Circle City Substation site is in an area underlain by a thin mantle of un-compacted fill overlying young alluvial channel deposits of the Temescal Wash, which range from fine grained mixtures of silt, sand, and some gravel, to coarse granular alluvium containing sand, gravel, cobbles and boulders mixtures. Uncompacted fill was encountered to a depth of about 2 feet, under which lay approximately 4 feet of generally fine grained, silt, sand, and gravel mixtures. Coarsely granular alluvium consisting of sand, gravel, cobble, and boulder mixtures to a depth of 28 feet were encountered below the top 6 feet (TDBU, 2012).

The second sentence in the last paragraph of Draft EIR geology and soils Section 4.7.1.3 has been revised as follows.

Testing indicated the site soils have very low expansion potential, and therefore no measures to treat expansive soils ~~geotechnical recommendations were identified made~~ (TDBU, 2012).



SOURCE: SCE, 2015; USGS, 2006

Circle City Substation and Mira Loma-Jefferson 66 kV Line Project . 207584.14

Figure 4.7-1
Earthquake Faults and Hazard Zones in the Project Vicinity

Text describing the existing landslide hazard in the last sentence of Draft EIR geology and soils Section 4.7.1.4, Geologic Hazards, has been revised as follows.

Also, the site topography is relatively level and the absence of nearby slopes precludes any slope stability hazards; the potential for seismically-induced landslides at any of the Project subtransmission alignments ~~or sites~~ is considered low. In addition, the potential for seismically-induced landslides within the Circle City Substation site is also considered low (TBDU Geotechnical Engineering Group, 2012).

The name of the mitigation measure described for Impact 4.7-3 contains a typographic error. The name of the mitigation measure has been revised as follows. The last two sentences of the fourth paragraph of the Impact 4.7-3 discussion have been revised as follows.

Because impacts may remain significant after application of APM AIR-01, implementation of Mitigation Measure 4.3-~~4~~2a would provide additional feasible fugitive dust controls beyond those required of APM AIR-01 (see Air Quality Sections 4.3.3 and 4.3.4 for descriptions of APM AIR-01 and Mitigation Measures 4.3-~~4~~2a, respectively). These measures would reduce the risk of soil loss due to wind erosion during Project construction activities to a less than significant impact.

The name of the mitigation measure identified for Impact 4.7-3 contains a typographic error. The name of the mitigation measure has been revised as follows.

Mitigation: Implement Mitigation Measure 4.3-~~4~~2a.

The second paragraph of the Alternative C3 geology and soils impact analysis discussion in Draft EIR Section 4.7.6.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

Although the subtransmission line that would be required for the 42 MW battery storage facility and substation would traverse within 0.6 mile of the Elsinore Fault Zone, Glen Ivy Section, no faults zoned under the Alquist-Priolo Earthquake Fault Zoning Act, or any other Holocene-active faults would be traversed by this alternative. In addition, existing subtransmission line and telecommunication line poles would be replaced with new poles built according to modern, up-to-date building codes. For these reasons, the ground shaking risk to people or structures associated with this alternative would be less than significant (4.7-1; Class III). The battery storage and substation facilities would be constructed in areas of very low liquefaction hazard, and the 40 MW facility would be constructed near the proposed Circle City Substation, an area with low liquefaction potential due to deep groundwater and dense soils. This alternative would require a smaller number of poles compared to the project, but like the proposed Project would result in construction of the subtransmission line and telecommunication line connections in areas mapped as being susceptible to liquefaction, resulting in new seismic hazard risks. Implementation of Mitigation Measure 4.7-2 would reduce this impact to less than significant by ensuring that appropriate engineering recommendations are implemented to reduce the risk of substantial adverse liquefaction effects (Impact 4.7-2; Class II).

The first and third sentences in the Alternative D1: 12 kV Distribution-Level Battery Storage discussion in Draft EIR geology and soils Section 4.7.5.3, Distribution Service Objectives Alternatives, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Alternative D1 would construct a battery storage facility, distribution connections, and a two telecommunication connections instead of the proposed Circle City Substation and associated source lines components of the Project. The battery storage facility would be constructed immediately adjacent to the proposed Circle City Substation site. The new telecommunication line connections similarly would be installed along the same alignment as the proposed Databank Source Lines and the same alignment as the proposed Circle City Substation site to the existing Corona Substation described for Alternative E4.

Section 4.8, Greenhouse Gas Emissions

The following revisions have been made to the Impact 4.8-1 discussion in Draft EIR Section 4.8, Greenhouse Gas Emissions, to reflect SCE's revised construction water use estimate. The first sentence of the second paragraph has been revised as follows:

The short-term construction emissions estimates provided by SCE do not include indirect emissions estimates associated with the proposed use of 58-107 acre-feet of water for dust suppression, cleanup, crew member consumption, and hand washing (SCE, 2015; p. 4.17-10).

The last paragraph and Table 4.8-2 of the Construction Emissions discussion has been revised as follows:

Table 4.8-2, Project Construction GHG Emissions, presents the total estimated GHG construction emissions that would be associated with the Project generated by off-road construction equipment, on-road vehicles, and water use. Approximately 2,711-2,759 metric tons of CO₂e would be generated during the Project's 18-month construction phase.

**TABLE 4.8-2
PROJECT CONSTRUCTION GHG EMISSIONS**

Emissions Source	CO₂e metric tons
Off-road Construction Equipment	1,522
On-road Vehicles	1,132
Water Use Indirect Emissions	<u>57-105</u>
Total	<u>2,744-2,759</u>

SOURCE: SCE, 2015; 2016; see Appendix D for all emissions estimates.

The Draft EIR GHG Construction Emissions discussion and Table 4.8-3 have been revised as follows. These revisions do not change the less-than-significant GHG impact determination identified in the Draft EIR.

Total Amortized Annual Emissions

As indicated in Table 4.8-2, *Project Construction GHG Emissions*, total GHG construction emissions would be approximately ~~2,711~~2,759 metric tons CO₂e. These emissions amortized over a 30-year period equal approximately ~~90~~92 metric tons per year. As presented in **Table 4.8-3**, *Project Amortized Annual Emissions*, adding ~~90~~92 metric tons of CO₂e to the operational emissions of 26 metric tons CO₂e per year equals a total Project GHG emissions rate of approximately ~~116~~118 metric tons CO₂e per year, which would be substantially less than the significance threshold of 10,000 metric tons CO₂e per year.

**TABLE 4.8-3
PROJECT AMORTIZED ANNUAL EMISSIONS**

Emissions Source	CO₂e metric tons/year
Construction emissions: total amortized (30 year period)	90 <u>92</u>
Maintenance and operations	2
SF ₆ Circuit Breaker Emissions	24
Total	116<u>118</u>
Significance threshold	10,000
Significant impact?	No

SOURCE: SCE, 2015; 2016; see Appendix D for all emissions estimates.

The first paragraph of the Alternative C3 greenhouse gas emissions impact analysis discussion in Draft EIR Section 4.8.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

Under Alternative C3, up to three subtransmission-level (66 kV) battery storage and substation facilities, associated subtransmission lines and telecommunication lines, and upgrades to existing Jefferson Substation, would be constructed and operated instead of the Mira Loma-Jefferson 66 kV line component of the Project.

The third paragraph of the Alternative C3 greenhouse gas emissions impact analysis discussion in Draft EIR Section 4.8.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

Using these assumptions, and the assumption that construction of the telecommunication lines would result in about half of the emissions as construction of the 66 kV connection lines, it is estimated that the total annual amortized emissions under Alternative C3, would be approximately ~~296~~292-metric tons CO₂e per year (see Appendix D for calculations), which would be approximately two and a half times more emissions than generated under the proposed Project, but still substantially less than the significance threshold of 10,000 metric tons.

Section 4.9, Hazards and Hazardous Materials

Mitigation Measure 4.9-8 in Impact 4.9-8 been revised as follows to clarify that its intent is to reduce the potential nuisance associated with people perceiving currents or experiencing small electric shocks and to acknowledge that there would be no Project-related electric shock nuisance outside of the existing 500 kilovolt (kV) right-of-way (ROW).

Mitigation Measure 4.9-8: As part of the siting and construction process, SCE shall identify objects, such as fences, metal buildings, pipelines, etc. that are within the 500 kV ROW that have the potential for induced voltages to cause a perceptible current or small electrical shock and shall implement electrical grounding of those metallic objects in accordance with Cal/OSHA Electrical Safety Orders at 8 CCR 2739. The identification of objects shall be provided to the CPUC at least 30 days prior to the commencement of construction, and shall document the thresholds of electric field strength and metallic object size at which grounding becomes necessary.

The last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative B in Section 4.9.5, Alternatives, has been revised as follows to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks and to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative and would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

Similarly, the last paragraph of the Draft EIR hazards and hazardous materials impact discussion for Alternative C1 in Section 4.9.5, Alternatives, has been revised as follows.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative and would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

Similarly, the last paragraph of the Draft EIR hazards and hazardous materials impact discussion for Alternative C2 in Section 4.9.5, Alternatives, has been revised as follows.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

The fifth and sixth paragraphs of the Alternative C3 hazards and hazardous materials impact analysis discussion in Draft EIR Section 4.9.5, Alternatives, have been revised as follows to include consideration of the telecommunication lines.

The Alternative C3 subtransmission line connection and telecommunication line alignments are not within the boundaries of the Riverside County Airport Land Use Commission's Airport Land Use Compatibility Plans for Chino Airport or Corona Municipal Airport, and the poles and conductor would be outside of the 100-to-1 surface ratio relative to the airports runways. Unlike the proposed Mira Loma-Jefferson subtransmission line, there would be no aviation safety impact under this alternative.

Temporary lane closures during construction activities associated with the subtransmission line connection and telecommunication line alignments along West 6th Street, Ontario Avenue, S. Lincoln Avenue, W. Grand Boulevard, 10th Street, and Magnolia Avenue, etc., could affect emergency vehicle access to and through construction areas. Given the reduced mileage of subtransmission line under this alternative compared to the proposed Mira Loma-Jefferson subtransmission line, this impact would be the reduced compared to the Project. Implementation of Mitigation Measure 4.17-1 would ensure that potential impacts associated with temporary effects on emergency service provider access would be mitigated to less-than-significant levels (Impact 4.9-5; Class II).

The last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative C3 in Section 4.9.5, Alternatives, has been revised as follows to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks and to acknowledged that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW. Below are the revisions to the sentence.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

The first sentence in the third paragraph of the Alternative D1: 12 kV Distribution-Level Battery Storage discussion in Draft EIR hazards and hazardous materials Section 4.9.5, Alternatives, has been revised as follows to reflect the second telecommunications line required for Alternative D1.

Temporary lane closures along Magnolia Avenue, Railroad Street, Grand Avenue, Quarry Street, 6th Street, and other streets during construction activities associated with the distribution and/or telecommunications connections could affect emergency vehicle access to and through construction areas.

The last sentence of the Draft EIR hazards and hazardous materials impact discussion for Alternative D1 in Section 4.9.5, Alternatives, has been revised as follows to clarify that the impact is associated with people perceiving currents or experiencing small electric shocks and to acknowledge that Mitigation Measures 4.9-8 would only be applicable to metal structures such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative due to the reduced amount of overhead lines that would be installed compared to the proposed Project. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

Similarly, the last paragraph of the Draft EIR hazards and hazardous materials impact discussion for Alternative D2 in Section 4.9.5, Alternatives, has been revised as follows.

Potential impacts related to perceptible currents or small electric shocks would be the same as the Project with implementation of Mitigation Measure 4.9-8 (Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

Similarly, the last paragraph of the Draft EIR hazards and hazardous materials impact discussion for Alternative E1 in Section 4.9.5, Alternatives, has been revised as follows.

In addition, although there would be no potential impacts related to perceptible currents or small electric shocks associated with the underground segment, the overall impact associated with the overhead segments of the source lines and the Mira Loma-Jefferson subtransmission line would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

Similarly, the last paragraph of the Draft EIR hazards and hazardous materials impact discussion for Alternative E2 in Section 4.9.5, Alternatives, has been revised as follows.

In addition, although there would be no potential impacts related to perceptible currents or small electric shocks associated with the underground segment, the overall impact associated with the overhead segments of the source lines and the Mira Loma-Jefferson subtransmission line would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

Similarly, the last paragraph of the Draft EIR hazards and hazardous materials impact discussion for Alternative E3 in Section 4.9.5, Alternatives, has been revised as follows.

In addition, the potential for impacts related to perceptible currents or small electric shocks associated with Alternative E3 would be increased compared to the Project given the longer length of overhead line compared to the proposed Databank Source Lines. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

Similarly, the last paragraph of Draft EIR hazards and hazardous materials impact discussion for Alternative E4 in Section 4.9.5, Alternatives, has been revised as follows.

In addition, potential impacts related to perceptible currents or small electric shocks would be decreased under this alternative due to reduced amount of overhead lines that would be installed. The impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure 4.9-8 (Impact 4.9-8; Class II), which would require electrical grounding of metallic objects, such as fences, metal buildings, pipelines, etc., within the 500 kV ROW.

Section 4.10, Hydrology and Water Quality

The following revisions have been made to the first two paragraphs of the NPDES Permit and Waste Discharge Requirements Applicable to the Project discussion in Draft EIR hydrology and water quality Section 4.10.1.4, Regulatory Setting, to include discussion of the San Bernardino County MS4 permit.

NPDES Permits and Waste Discharge Requirements Applicable to the Project

Order Nos. R8-2010-0033 (NPDES No. CAS 618033) and R8-2010-0036 (NPDES No. CAS 618036) requires co-permittees of ~~this-these~~ Orders to be responsible for managing the Urban Runoff program within ~~its~~ their jurisdiction. Co-permittees of R8-2010-0033 are local agencies, including the Riverside County Flood Control and Water Conservation District, the County of Riverside, and other incorporated cities of Riverside County within the Santa Ana Region, including the cities of Corona, Eastvale, and Norco. Co-permittees of R8-2010-0036 are also local agencies, including San Bernardino County Flood Control District and the cities of Chino and Ontario. Co-permittees to ~~this-these~~ Orders have multiple additional responsibilities, including maintaining adequate legal authority to control the contribution of pollutants to the MS4, implementing management programs and appropriate BMPs, seeking sufficient funding for urban runoff program management, and ensuring that applicants for encroachment permits for permanent connection to MS4 facilities are notified of their obligations to comply with Storm Water ordinances. Pursuant to ~~this-these~~ permits, projects with certain characteristics that must seek discretionary approval of maps or permits from the co-permittees are required to prepare a Water Quality Management Plan (WQMP). As noted below in the *Local* regulations discussion, local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the California Public Utilities Commission's (CPUC) jurisdiction. The Project would not

seek discretionary permits from local agencies; for this reason, the Project would not require preparation of a Water Quality Management Plan.

The co-permittees are also required to develop a Watershed Action Plan (~~RBF Consulting, 2012~~). One component of this Watershed Action Plan is the Hydromodification³ Management Plan, which includes delineation of existing unarmored or soft-armored stream channels in the Permit Area that are identified to be vulnerable to hydromodification from development projects (~~RBF Consulting, 2012~~). As described in this permit, if all downstream conveyance channels from a development site that drain to an adequate sump⁴ are engineered and regularly maintained⁵ to ensure design flow capacity, and no sensitive stream habitat areas will be affected, then the development would not result in significant effects to downstream channels and aquatic habitats (that is, would not cause a hydrologic condition of concern). As a means of streamlining management efforts, the Riverside County Flood Control and Water Conservation District (RCFCWCD) mapped areas that are not considered susceptible to hydromodification from development (RBF Consulting, 2012). The San Bernardino County Flood Control District has similarly mapped area not considered susceptible to hydromodification from development, and makes this information available on its Geodatabase.⁶

⁶ The Geodatabase (also called the Stormwater Facility Tracking Tool) is available online at <http://permitrack.sbcounty.gov/WAP/>.

The following revisions have been made to the third paragraph of the NPDES Permit and Waste Discharge Requirements Applicable to the Project discussion in Draft EIR hydrology and water quality Section 4.10.1.4 to include reference San Bernardino County's Geodatabase.

It is through the review and approval of project-specific WQMPs that the co-permittees ensure projects do not pose a hydrologic condition of concern. For this reason, SCE would not be required to determine whether a hydrologic conditions of concern would be created due to the Project. However, for purposes of this analysis, the hydromodification susceptibility information developed for the Watershed Action Plans is used to identify channels susceptible to hydromodification. Two segments of the proposed Mira Loma-Jefferson subtransmission line alignment traverse areas with potentially susceptible stream channels: one along River Road south of the Santa Ana River corridor, and another in the vicinity of Mill Creek along the border of Riverside and San Bernardino counties (RBF Consulting, 2012, RBF Consulting, 2011; San Bernardino County Department of Public Works, 2018).

The first sentence under the Linear Facilities heading in the Draft EIR hydrology and water quality Impact 4.10-3 discussion has been revised as follows to reflect the correct amount of light-weight steel (LWS) poles that would be located in the Santa Ana River corridor.

Construction of the proposed linear Project facilities, such as the source lines, Mira Loma-Jefferson subtransmission line, and distribution getaways, would temporarily alter drainage patterns across the construction areas, including activity in the Santa Ana River

corridor during construction and installation of two H-frames and ~~one~~eleven light-weight steel (LWS) poles.

The fourth sentence of the last paragraph of the Alternative C3 hydrology and water quality impact analysis discussion in Draft EIR Section 4.10.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

This alternative would result in fewer workers being exposed to flooding because the Mira Loma-Jefferson subtransmission line would not be constructed; however, workers along the subtransmission line and telecommunication line alignments for the 40 MW battery storage and substation facility in the vicinity of the Temescal Wash would be exposed to flooding and mudflow in the event that a dam on Lake Mathews fails.

The first and second sentences in the Alternative D1: 12 kV Distribution-Level Battery Storage discussion in Draft EIR hydrology and water quality Section 4.10.5.3, Distribution Service Objectives Alternatives, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Alternative D1 would result in the construction of a battery storage facility, distribution connections, and ~~a two~~telecommunication connections instead of the proposed Circle City Substation and associated source lines components of the Project. The battery storage facility would be constructed immediately adjacent to the proposed Circle City Substation site and the telecommunications lines would be constructed ~~on~~ along the same alignments as the proposed Databank Source Lines and the proposed Circle City Substation site to the existing Corona Substation telecommunication line described for Alternative E4.

Section 4.11, Land Use and Planning

The first two sentences in the City of Chino General Plan discussion in Draft EIR land use and planning Section 4.11.1.2, Regulatory Setting, have been revised as follows to correct this error.

The Mira Loma-Jefferson subtransmission line would cross *Agriculture*, ~~*Neighborhood Commercial*~~, and *Open Space/Recreation Buffer Trail* land use designations. In addition, it would cross the following residential land use designations: *Medium Density Residential*, *High Density Residential*, *Residential Development (RD) 2*, *RD4.5* and *RD8* (City of Chino, 2017 2015a).

The first sentence in the City of Chino Zoning discussion in Draft EIR land use and planning Section 4.11.1.2, Regulatory Setting, has been revised as follows.

The Mira Loma-Jefferson subtransmission line and the potential staging area site along Hellman Avenue would be located within the following zoning designations in The Preserve Specific Plan area: *Agriculture/Open Space-Natural (AG/OS-N)*, ~~*Neighborhood Commercial (CN)*~~, *Estate Residential Zone (ER)*, *Low Density Residential (LDR)*, and *Medium Density Residential (MDR)* (City of Chino, 2015b).

The first sentence in the City of Chino General Plan discussion under impact criterion b) in the Draft EIR land use and planning Section 4.11.4, Impacts and Mitigation Measures, has been revised as follows to mention all applicable land uses.

The Mira Loma-Jefferson subtransmission line would be located within The Preserve Specific Plan within Medium Density Residential, High Density Residential, Residential Development (RD) 2, RD4.5, RD8, Agriculture, ~~Neighborhood Commercial~~, and Open Space/Recreation Buffer Trail land use designations.

Section 4.12, Mineral Resources

The first sentence in the Alternative D1: 12 kV Distribution-Level Battery Storage discussion in Draft EIR minerals resources Section 4.12.5.3, Distribution Service Objectives Alternatives, has been revised as follows to reflect the second telecommunications lines required for Alternative D1.

Alternative D1 would result in the construction of a battery storage facility, distribution connections, and ~~a telecommunication connections~~ instead of the proposed Circle City Substation and associated source lines components of the Project.

Section 4.13, Noise

The Summary of Sensitive Receptors - Subtransmission Line Alignment Alternatives discussion in Draft EIR noise Section 4.13.1.3, Sensitive Receptors, has been revised as follows to show the correct names for the Mira Loma-Jefferson subtransmission line and Alternative C3.

Alternative C1 (Underground Hellman Avenue) would expose the same sensitive receptors as the Project along the proposed Mira_Loma_Jefferson subtransmission line alignment. Alternative C2 (Archibald Avenue) would occur adjacent to residential receptors along Archibald Avenue between Belgrave Avenue and the Santa Ana River. The route would occur in a southeasterly direction along the Mira Loma-Jefferson subtransmission line alignment exposing the same receptors as described for the Project. With regard to Alternative ~~C2~~ C3 (Subtransmission-Level Battery Storage), the 50 MW subtransmission-level battery storage facility would be located approximately 270 feet east-northeast of the Christian Heritage School and approximately 50 feet south of residences along Pleasant View Avenue;

The first paragraph of the Alternative C3 noise impact analysis discussion in Draft EIR Section 4.13.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

Under Alternative C3, up to three subtransmission-level (66 kV) battery storage and substation facilities, associated subtransmission and telecommunication lines, and upgrades to existing Jefferson Substation, would be constructed and operated instead of the Mira Loma-Jefferson 66 kV line component of the Project. With the exception of the 40 MW subtransmission-level battery storage and substation site off Leeson Lane near the proposed Circle City Substation site, which is approximately 800 feet from the closest residences,

each of the other two subtransmission-level battery storage and substation sites and associated subtransmission and telecommunication line alignments are in the immediate vicinity (i.e., within 50 feet) of receptors that are sensitive to noise. All components associated with Alternative C3 would be within the City of Corona.

The third paragraph of the Alternative C3 noise impact analysis discussion in Draft EIR Section 4.13.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

It is assumed that construction activities associated with the battery storage and substation facilities would be similar to those that would be associated with Circle City Substation and that construction activities associated with the subtransmission and telecommunication line connections would be similar to those that would be associated with the proposed source lines and Mira Loma-Jefferson subtransmission line. Therefore, the construction noise levels would be similar.

Draft EIR Mitigation Measure 4.13-1 has been revised as follows to allow for site grading associated with Alternative C3 before installation of the permanent block wall at the sites, while reducing grading-related noise levels through installation of a temporary construction noise barrier.

Mitigation Measure 4.13-1: Should Alternative C3 be selected as part of the approved project, ~~prior to commencement of construction activities~~, an 8-foot-high block wall shall be installed along the perimeter of the 50 MW and 42 MW subtransmission-level battery storage and substation sites immediately following the conclusion of grading activities at the sites. Until the permanent walls are constructed, temporary construction noise barriers that feature a solid panel and a weather-protected, sound-absorptive material on the construction activity side of the barrier shall be installed that shall block the line of sight between near-by sensitive receptors and the construction sites. The temporary construction noise barriers and permanent walls shall attenuate construction and operational noise levels. SCE shall retain an acoustical engineer to perform noise measures in the vicinity of the residences to verify that the 50 MW and 42 MW subtransmission-level battery storage and substation operational noise levels comply with the City's nighttime exterior noise level limit of 50 dBA. Documentation of compliance shall be submitted to the CPUC no later than 60 days after the start of operations. In the event the facility noise levels violate the standards, additional noise control techniques shall be initiated to connect the violation.

Draft EIR noise Mitigation Measure 4.13-2c has been revised as follows to allow for site grading associated with Alternative D2 before installation of the permanent block wall at the site, while reducing grading-related noise levels through installation of a temporary construction noise barrier.

Mitigation Measure 4.13-2c: Should Alternative D2 be selected as part of the approved project, the 8-foot-high block wall that is part of the alternative shall be installed along the perimeter of the substation site ~~prior to the commencement of substation construction activities~~ immediately following the conclusion of grading activities at the site. Until the permanent wall is constructed, a temporary construction noise barrier that feature a solid

panel and a weather-protected, sound-absorptive material on the construction activity side of the barrier shall be installed that shall block the line of sight between near-by sensitive receptors and the construction site shall be installed.

Section 4.14, Population and Housing

No text revisions have been made to Section 4.14, *Population and Housing*.

Section 4.15, Public Services

No text revisions have been made to Section 4.15, *Public Services*.

Section 4.16, Recreation

The Alternative C3 recreation impact analysis discussion in Draft EIR Section 4.16.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

~~The Alternative C3 battery storage and substation sites and 66 kV subtransmission line alignments are not in the immediate vicinity of parks or other recreational facilities. Therefore, Alternative C3 would have no effect on existing recreational facilities. Alternative C3 would avoid the less than significant construction related impacts at the City of Eastvale's American Heroes Park because the Mira Loma Jefferson 66 kV subtransmission line would not be constructed under this alternative. Similar to the temporary construction-related impacts to American Heroes Park that would occur associated with the proposed Mira Loma-Jefferson subtransmission line (see Construction discussion for the Project in Impact 4.16-1), the Alternative C3 telecommunication alignments for the 42 MW and 40 MW facilities would be located adjacent to Lincoln Park along S. Lincoln Avenue, and City Park along Quarry Street, respectively, which may result in temporary lane closures and park access restrictions, which would be a less-than-significant impact (Impact 4.16-1; Class III). As under the Project, Alternative C3 would not include recreational facilities or require the construction or expansion of such facilities that could result in adverse physical effects on the environment; therefore, no impact would occur (No Impact).~~

Section 4.17, Transportation and Traffic

The first sentence in Draft EIR Section 4.17.1.1, Regional Roadways, has been revised as shown below to reference State Route 71, not State Route 74.

Riverside County is linked to Los Angeles and Orange counties primarily by State Route 60 (SR 60), Interstate 10 (I-10), SR 91, and SR ~~74~~71.

The first sentence of Mitigation Measure 4.17-1 in Impact 4.17-1 has been revised as shown below.

Mitigation Measure 4.17-1: As part of any encroachment permit, SCE shall prepare and implement a Traffic Management Plan subject to approval of Caltrans and/or the

applicable local government(s), including agencies that operate alternative modes of transportation (e.g., North Main Corona Metrolink Station, the Corona Cruiser/RTA bus route, and the Metrolink Rail path).

The first sentence of the Alternative C3 transportation and traffic impact analysis discussion in Draft EIR Section 4.17.5.2, Subtransmission Service Objectives Alternatives, has been revised as follows to include consideration of the telecommunication lines.

Under Alternative C3, up to three subtransmission-level (66 kV) battery storage and substation facilities, associated subtransmission and telecommunication lines, and upgrades to existing Jefferson Substation, would be constructed and operated instead of the Mira Loma-Jefferson 66 kV line component of the Project.

The third sentence in the second paragraph of the Alternative D1: 12 kV Distribution-Level Battery Storage discussion in Draft EIR transportation and traffic Section 4.17.5.3, Distribution Service Objectives Alternatives, has been revised as follows to reflect the telecommunications lines required for Alternative D1.

Although, some limited construction in Leeson Lane would be required to connect distribution circuits, and construction would be required in or along Magnolia Avenue, Railroad Street, Grand Avenue, Quarry Street, 6th Street, and other streets to connect the telecommunication lines, the overall construction-related impacts would be reduced compared to the proposed Project, and impacts would be less than significant with implementation of Mitigation Measure 4.17-1 (Impacts 4.17-1, 4.17-6, and 4.17-7; Class II).

Section 4.18, Utilities and Service Systems

No text revisions have been made to Section 4.18, *Utilities and Service Systems*.

Chapter 5. Comparison of Alternatives

The Distribution Service Objective in Draft EIR Section 5.2 has been revised as follows.

- **Distribution Service Objective** – Maintain electrical system reliability by ensuring ~~Ensure~~ that the Corona, Jefferson, and Chase substations do not exceed capacity under peak electrical demand conditions through the 2017 to 2026 forecast period.

The eighth row of the first column in Chapter 5 Table 5-2 under Section 4.9, Hazards and Hazardous Materials, has been revised as follows to clarify that the nuisance induced current impact would be associated with perceiving currents or small electric shocks.

Impact 4.9-8: Induced currents associated with operation of the Project could generate <u>perceivable currents or small</u> electrical shocks.
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The following revisions to Draft EIR Section 5.3.1, Subtransmission Service Objective, have been made to clarify the environmental ranking of the Project and Subtransmission Service Objective alternatives:

5.3.1.1 Environmental Ranking of Subtransmission Service Objective Alternatives

As mentioned above, significant long-term aesthetics impacts are weighted more heavily in the comparison of alternatives than temporary construction-related significant air quality and noise impacts, and are therefore used as the primary basis in the environmental ranking of alternatives. Alternative B would result in a material reduction of adverse impacts compared to the proposed Project because it would eliminate construction and operation of the proposed Circle City Substation and its source lines or the construction and operation of an alternative that would address the Distribution Service Objective; however, the Distribution Service Objective would not be accomplished under Alternative B and as a result, the ENA would potentially experience a shortage of electricity and the electrical distribution system could become vulnerable to upset starting year 2024. Therefore, Alternative B is not included in the ranking of the Subtransmission Service Objective Alternatives.

The environmental ranking of Subtransmission Service Objective alternatives, with ranking No. 1 as the environmentally superior alternative, is presented in **Table 5-3**. One of these alternatives or the proposed Mira Loma-Jefferson subtransmission line would be paired with an alternative, a group of alternatives, the proposed Circle City Substation and source lines, or a combination thereof, that address the Distribution Service Objective (see Section 5.3.2, below).

**TABLE 5-3
SUBTRANSMISSION SERVICE OBJECTIVE RANKING OF ALTERNATIVES AND THE PROJECT**

Rank	Alternative	Rationale
Mira Loma-Jefferson Subtransmission Line Alternative		
1	Alternative C1: Underground 66 kV Subtransmission Line along Hellman Avenue	The significant aesthetics impact along Hellman Avenue associated with the Mira Loma-Jefferson subtransmission line would be avoided.
2	Alternative C2: 66 kV Subtransmission Line along Archibald Avenue	The significant aesthetics impact along Hellman Avenue associated with the Mira Loma-Jefferson subtransmission line would be avoided, but aside from that segment of the proposed subtransmission line, the visual impacts associated with the overhead portion of this alternative would generally be greater (but still less than significant) compared to the proposed Project because the overhead portions would be visible to substantially more motorists.
3	Proposed Project: Mira Loma-Jefferson 66 kV Subtransmission Line	The proposed Project would result in a significant aesthetics impact along Hellman Avenue associated with the Mira Loma-Jefferson subtransmission line.
4	Alternative C3: 66 kV Subtransmission-Level Battery Storage.	Alternative C3 would avoid the significant aesthetics impact along Hellman Avenue associated with the proposed subtransmission line, but it would result in additional significant aesthetic impacts in City of Corona.

NOTES: Blue text = Rank 1; Red text = Rank 2

As described in Table 5-3, Alternative C1, *Underground 66 kV Subtransmission Line along Hellman Avenue*, ranks first for the Subtransmission Service Objective, followed by Alternative C2, *66 kV Subtransmission Line along Archibald Avenue*, the proposed Mira Loma-Jefferson 66 kV Subtransmission Line, and Alternative C3, *66 kV Subtransmission-Level Battery Storage*, respectively.

The following revisions to Draft EIR Section 5.3.2, Distribution Service Objective, have been made to clarify the environmental ranking of the Project and Distribution Service Objective alternatives:

5.3.2.1 Environmental Ranking of Distribution Service Objective Alternatives

As mentioned above, significant long-term aesthetics impacts are weighted more heavily in the comparison of alternatives than temporary construction-related significant air quality and noise impacts, and are therefore used as the primary basis in the environmental ranking of alternatives. Where pairing of alternatives can achieve additional reduction of impacts, that pair is ranked as well. The environmental ranking of the Distribution Service Objective alternatives, with ranking No. 1 as the environmentally superior alternative, is presented in **Table 5-4**. Because some of the alternatives only address one of the Project components, the table is organized by header rows for each of the Project components proposed to meet the Distribution Service Objective. One of these alternatives, or group of alternatives/Project components, to address the proposed Circle City Substation, Pedley Source Lines, and Databank Source Lines would be paired with the proposed Mira Loma-Jefferson subtransmission line or an alternative that addresses the Subtransmission Service Objective (see Section 5.3.1, above).

As described in Table 5-4, Alternative D1, *112 kV Distribution-Level Battery Storage*, ranks first because it is the only alternative that reduces impacts associated with the proposed Circle City Substation, Pedley Source Lines, and Databank Source Lines. The group of alternatives/Project components to rank second are the proposed Circle City Substation combined with Alternative E4, *Databank 66 kV Source Lines Only*, and the proposed Databank Source Lines. Because the environmental impacts associated with the proposed Circle City Substation would be less than those associated with Alternative D2, *66/12 kV Substation Site Alternative*, and the environmental impacts associated with the proposed Databank Source Lines would be less than those associated with Alternative E3, *Southern 66 kV Source Lines Alignment*, the next highest ranked alternatives/Project components would be the proposed Circle City Substation and Databank Source Lines grouped with Alternative E1, *Quarry Street 66 kV Source Lines Segment*, and Alternative E2, *Underground Pedley 66 kV Source Lines from I-15 to Circle City Substation*, followed by the proposed Circle City Substation and Databank Source Lines grouped with only Alternative E2, and so on as described in Table 5-4.

TABLE 5-4
DISTRIBUTION SERVICE OBJECTIVE RANKING OF ALTERNATIVES AND THE PROJECT

Rank	Alternative	Rationale
Substation Alternatives		
<u>1</u>	Alternative D1: 12 kV Distribution-Level Battery Storage	The battery storage facility under Alternative D1 would reduce significant air quality impacts and less than significant aesthetic impacts associated with the proposed substation, while resulting in no new significant aesthetics impacts.
<u>2</u>	Proposed Project: Circle City Substation	The proposed Circle City Substation would result in less-than-significant aesthetics impacts and less-than-significant impacts with mitigation associated with health risk due to diesel particulate matter exposure and noise.
<u>3</u>	Alternative D2: 66/12 kV Substation Site Alternative	Significant health risk impacts from construction-related diesel particulate matter, and construction-related noise impacts would be increased under Alternative D2 and would be significant and unavoidable for nighttime construction and mitigated to less than significant for daytime construction.
Pedley Source Line Alternatives		
<u>1</u>	Alternative D1: 12 kV Distribution-Level Battery Storage	Same as above. Substation source lines would not be constructed because the proposed substation would not be constructed.
<u>2</u>	Alternative E4: Databank 66 kV Source Lines Only	The Pedley Source Lines would not be constructed. Alternative E4 would eliminate the significant aesthetic impacts and reduce the contribution to the significant air quality and noise impacts associated with the proposed Pedley Source Lines.
<u>3</u>	Alternative E2: Underground Pedley 66 kV Source Lines from I-15 to Circle City Substation paired with Alternative E1: Quarry Street 66 kV Source Lines Segment	These alternatives paired together would avoid the significant aesthetics impact associated with the proposed Pedley Source Lines in the vicinity of Interstate 15 and reduce the significant impact in the vicinity of Grand Boulevard; however, they would increase the significant air quality impacts due to increased emissions associated with undergrounding the two line segments.
<u>4</u>	Alternative E2: Underground Pedley 66 kV Source Lines from I-15 to Circle City Substation	Alternative E2 would avoid the significant aesthetics impact associated with the proposed Pedley Source Lines in the vicinity of Interstate 15 and East 6th Street, while increasing the significant air quality impact due to increased emissions associated with undergrounding the line. Significant aesthetics impacts would occur associated with the proposed Pedley Source Lines in the vicinity of Grand Avenue.
<u>5</u>	Alternative E1: Quarry Street 66 kV Source Lines Segment	Alternative E1 would reduce the significant impact associated with the Pedley Source Lines in the vicinity of Grand Boulevard, while increasing the significant air quality impact due to increased emissions associated with undergrounding the line. Significant aesthetics impacts would occur associated with the proposed Pedley Source Lines in the vicinity of Interstate 15 and East 6th Street.
<u>6</u>	Proposed Pedley Source Lines	The proposed Project would result in significant aesthetics impacts associated with the Pedley Source Lines in the vicinity of Grand Boulevard, Interstate 15, and East 6th Street.
Databank Source Line Alternatives		
<u>1</u>	Alternative D1: 12 kV Distribution-Level Battery Storage	Same as above.
<u>2</u>	Proposed Databank Source Lines	The proposed Project would result in significant aesthetics impacts associated with the Databank Source Lines along Magnolia Avenue.
<u>3</u>	Alternative E3: Southern 66 kV Source Lines Alignment.	Alternative E3 would result in the same significant aesthetics impacts associated with the Pedley Source Lines in the vicinity of Grand Boulevard, Interstate 15, and East 6th Street. Although the significant aesthetics impact associated with the Databank Source Lines would be avoided, this alternative would result in new significant aesthetics impacts to Interstate 15 motorists that would be more severe than the aesthetics impacts associated with the Databank Source Lines.

NOTES: Blue text = Rank 1; Red text = Rank 2

The original Draft EIR Table 5-3 has been renumbered Table 5-5.

Chapter 6. Cumulative Effects

The second sentence in the fourth paragraph of Draft EIR Section 6.2.5, *Cultural Resources*, has been revised as follows to reference the correct mitigation measure.

The significant construction impacts of the Project would be mitigated such that significant cultural resources are avoided if feasible, and that excavation would cease if a cultural or historical resource (including human remains) is uncovered during Project construction (Mitigation Measures ~~4.5-21~~ and ~~4.5-5~~, described in Section 4.5.4).

Chapter 7. Other CEQA Considerations

The following revisions have been made to Draft EIR environmental justice Section 7.4.2.1 to incorporate a summary of the alternatives impact analyses in Chapter 4 resource sections; no new information is added to the Final EIR that was not previously disclosed in the Draft EIR.

7.4.2.1 Impacts on Sensitive Receptors and Cumulative Environmental Burdens

The environmental impacts of the proposed Project and alternatives to the Project on sensitive receptors are analyzed in the EIR in the following sections: Section 4.3, *Air Quality*; Section 4.9, *Hazards and Hazardous Materials*; and Section 4.13, *Noise*. The proposed Project's impacts together with existing or foreseeable environmental burdens experienced by nearby communities are considered in Chapter 6, *Cumulative Effects*. Impacts of the proposed Project and alternatives on sensitive receptors include:

Air Quality

All of the conclusions below are explained in detail in in Draft EIR Sections 4.3.4 (for impacts of the proposed Project) and 4.3.5 (for impacts of the alternatives).

- *Proposed Project*: Construction activities would expose sensitive receptors to harmful pollutant concentrations of PM_{2.5} and PM₁₀. (Impact 4.3-6, significant and unavoidable)
 - Alternatives B, C1, C2, C3, D2, E1, E2, E3, and E4: Significant and unavoidable, approximately the same as for the proposed Project
 - Alternative D1: Less than significant, reduced compared to the proposed Project because emissions associated with construction of the distribution-level battery storage facility would be well below allowable emissions thresholds
- *Proposed Project*: Construction activities could expose local sensitive receptors to emissions of diesel particulate matter. (Impact 4.3-7, less than significant with mitigation)
 - Alternative B: Less than significant, reduced compared to the proposed Project because there would be no toxic air contaminants (TAC) emissions from construction of a substation, and the residents at the Corona La Linda Mobile

- Home Park would not be exposed to an incremental carcinogenic health risk impact
- Alternatives C1 and C2: Less than significant with mitigation, approximately the same as for the proposed Project
 - Alternative C3: Significant and unavoidable, increased compared to the proposed Project because if the 40 MW battery facility and the Circle City Substation both are approved and constructed adjacent to the each other, the maximum pre-mitigation incremental cancer risk at the nearest residences would increase to 24.0 in one million, and effectiveness of mitigation cannot be substantiated for this combination
 - Alternative D1: Less than significant, reduced compared to the proposed Project because the maximum incremental increase in carcinogenic risk associated with construction of the distribution-level battery storage facility would be roughly half that of the proposed substation
 - Alternative D2: Significant and unavoidable, with a substantially higher pre-mitigation maximum incremental construction-related increase in carcinogenic risk than 12 in one million at the closest sensitive receptors compared to the proposed Project
 - Alternatives E1, E2, E3, and E4: Less than significant with mitigation, approximately the same as for the proposed Project
 - Proposed Project: Construction activities could expose local sensitive receptors to *coccidioides immitis* (Valley fever-causing) spores. (Impact 4.3-8, less than significant with mitigation)
 - Alternatives B, D1, E3, and E4: Less than significant with mitigation, but slightly reduced compared to the proposed Project due to less ground disturbance
 - Alternatives C1, C2, C3, D2, E1, and E2: Less than significant with mitigation, but slightly increased compared to the proposed Project due to greater ground disturbance

Hazards and Hazardous Waste

All of the conclusions below are explained in detail in Draft EIR Sections 4.9.4 (for impacts of the proposed Project) and 4.9.5 (for impacts of the alternatives).

- Proposed Project: Construction activities could release hazardous materials within the vicinity of an existing school. (Impact 4.9-3, less than significant with mitigation)
 - Alternative B: Less than significant with mitigation, but slightly reduced compared to the proposed Project due to less construction
 - Alternative C1, D1, D2, E1, E2, E3, and E4: Less than significant with mitigation, approximately the same as for the proposed Project
 - Alternative C2: Less than significant with mitigation, but slightly increased compared to the proposed Project due to proximity to additional schools

- Alternative C3: Less than significant, reduced compared to the proposed Project due to greater distance from schools

Noise

All of the conclusions below are explained in detail in Draft EIR Sections 4.13.4 (for impacts of the proposed Project) and 4.13.5 (for impacts of the alternatives).

- *Proposed Project:* Construction activities would cause a substantial temporary increase in ambient noise levels at sensitive receptor locations. (Impact 4.13-32, significant and unavoidable)
 - Alternative B: Significant and unavoidable, but reduced compared to the proposed Project because the significant impacts associated with the proposed source lines would not occur
 - Alternative C1, E1, and E2: Significant and unavoidable, approximately the same as for the proposed Project
 - Alternative C2: Significant and unavoidable, but increased compared to the proposed Project because more residences would be exposed to significant noise levels due to the alternative's more densely populated area
 - Alternative C3: Significant and unavoidable, but increased compared to the proposed Project because the sensitive receptor noise exposure periods associated with construction of the battery storage facilities would be much longer (i.e., up to a year), compared to the exposure periods that would be experienced relative to construction of the Mira Loma-Jefferson subtransmission line (i.e., up to several weeks)
 - Alternative D1: Less than significant, reduced compared to the proposed Project given that construction of the substation source lines would not occur
 - Alternative D2: Significant and unavoidable for nighttime construction (increased compared to the proposed Project), mitigated to less than significant for daytime construction (reduced compared to the proposed Project)
 - Alternative E3: Significant and unavoidable, but increased compared to the proposed Project because there are more sensitive receptors adjacent the Alternative E3 alignment than the Databank Source Lines alignment
 - Alternative E4: Significant and unavoidable, but reduced compared to the proposed Project because the sensitive receptors along the proposed Pedley Source Lines alignment would not be exposed to construction noise

Summary

As described above, Alternative B would reduce TAC emissions, benefiting the residents at the Corona La Linda Mobile Home Park, and overall, less ground disturbance and construction would occur that could cause dust- and noise-related impacts.

Alternative D1 would reduce several impacts on sensitive receptors compared to the proposed Project. Emissions associated with construction of the distribution-level battery storage facility would be below allowable emissions thresholds, the maximum

incremental increase in carcinogenic risk associated with construction of the distribution-level battery storage facility would be roughly half that of the proposed substation, and overall, less ground disturbance and construction would occur that could cause dust- and noise-related impacts.

Alternatives C3, E3, and E4 would each reduce at least one impact.

From an environmental justice perspective, Alternatives B and D1 would provide the most substantial reductions in impacts on sensitive receptors compared to the proposed Project.

Chapter 8. Report Preparation

No text changes have been made to Chapter 8, *Report Preparation*.

Chapter 9. Mitigation Monitoring and Reporting Program

Chapter 9 has been revised as follows.

Draft EIR Chapter 9, *Mitigation Monitoring and Reporting Program*, is provided in full in Appendix F to the Final EIR. All revisions to the mitigation measures as presented in the Draft EIR are incorporated in Final EIR Appendix F. ~~The Mitigation Monitoring and Reporting Program will be included in the Final EIR.~~ For a consolidated list of the Draft EIR Mitigation Measures, refer to Executive Summary Table ES-1, *Summary of Impacts of and Mitigation Measures for the Project*.