

SOUTHERN CALIFORNIA EDISON'S FALCON RIDGE SUBSTATION PROJECT

CPUC A.10-12-017
SCH NO. 2011041009

Final Environmental Impact Report

Prepared for
California Public Utilities Commission

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TABLE OF CONTENTS

SCE's Falcon Ridge Substation Project Final Environmental Impact Report

	<u>Page</u>
1. Introduction	1-1
1.1 Purpose of this Document	1-1
1.2 Project Overview.....	1-1
1.3 Organization of the Final EIR.....	1-2
2. Comments and Responses	2-1
2.1 Opportunities for Public Comment on the Draft EIR	2-1
2.2 Comments on the Draft EIR.....	2-2
2.3 Responses to Comments	2-2
2.4 List of Commenters.....	2-3
2.5 Master Responses.....	2-5
2.5.1 MR1: Alternative 1/Environmentally Superior Alternative and the Portion of the B.F. Goodrich Superfund Site Now Occupied by Rialto Concrete Products.....	2-5
2.5.2 MR2: Flood Control District ROW Alternative (New Alternative).....	2-16
2.5.3 MR3: Underground vs. Overhead Lines	2-33
2.5.4 MR4: Additional Staging Areas.....	2-38
2.6 Individual Responses.....	2-33
Comment Letter A-1: Southern California Edison, Thomas Diaz.....	2-43
Comment Letter B-1: California Department of Transportation, Daniel Kopulsky, Office Chief	2-138
Comment Letter B-2: California Department of Toxic Substances Control, Greg Holmes, Unit Chief	2-140
Comment Letter B-3: California Department of Fish and Game, Jeff Brandt, Senior Environmental Scientist	2-147
Comment Letter B-4 South Coast Air Quality Management District, Ian MacMillan, Program Supervisor.....	2-155
Comment Letter B-5: City of Fontana, Charles D. Fahie, Senior Planner ..	2-158
Comment Letter B-6: City of Rialto, Gina M. Gibson, Senior Planner.....	2-189
Comment Letter B-7: Fontana Unified School District, Robert Copeland, Director of Facilities Planning, Design, Construction, Maintenance and Operations	2-193
Comment Letter C-1: Lewis Operating Corporation, LLC, Garth Chambers.....	2-197
Comment Letter C-2: Hall & Foreman, Inc., John Hogan, CEO/Principal..	2-201
Comment Letter C-3: Gresham, Savage, Nolan & Tilden, John C. Nolan, on behalf of the J. W. Mitchell Company, LLC	2-205
Comment Letter C-4: The KTI Group of Companies and Rialto Concrete Products.....	2-259
Comment Letter D-1: Oswald Realegeno	2-263

	<u>Page</u>
2. Comments and Responses (continued)	
2.6 Individual Responses (continued)	
Comment Letter D-2: John C. Hogan, CEO/Principal, Hall & Foreman, Inc.....	2-265
Comment Letter D-3: Greg Lanz, City of Rialto	2-267
Comment Letter D-4: Charles Fahie, City of Fontana.....	2-269
3. Revisions to the Draft EIR	3-1
3.1 Introduction	3-1
3.2 Text Changes	3-1

Final EIR Figures

2-1	B.F. Goodrich Superfund 160-acre Site Boundary.....	2-9
2-2	Flood Control District ROW Alternative.....	2-17
2-3a	Proposed Falcon Ridge Substation 66kV Corridor Acquisition Status Map	2-231
2-3b	Proposed Falcon Ridge Substation 66kV Corridor Acquisition Status Map	2-232
2-3c	Proposed Falcon Ridge Substation 66kV Corridor Acquisition Status Map	2-233

Final EIR Tables

2-1	Commenters on the Falcon Ridge Substation Project Draft Environmental Impact Report	2-4
-----	---	-----

Appendices

A.	Notice of Availability.....	A-1
B.	Draft EIR Newspaper Legal Advertisements.....	B-1
C.	CPUC Project Website.....	C-1
D.	Public Meeting Sign-in Sheets and Speaker Cards	D-1
E.	Public Meeting Presentation	E-1
F.	Final Remedial Investigative Report, B.F. Goodrich Site	F-1
G.	Revised Draft EIR Figures	G-1
H.	Mitigation Monitoring, Reporting, and Compliance Program.....	H-1
I.	Falcon Ridge Substation Project Intex Alternative	I-1

January 2012 Draft EIR (located on CD inside front cover)

CHAPTER 1

Introduction

1.1 Purpose of this Document

The California Public Utilities Commission (CPUC) has prepared this Final Environmental Impact Report (Final EIR) to document its analysis of the potential environmental impacts of the Falcon Ridge Substation Project (Project) proposed by Southern California Edison (SCE, or Applicant). The Final EIR consists of this Response to Comments document and the January 2012 Falcon Ridge Substation Project Draft EIR (SCH No. 2011041009). The CPUC will use this Final EIR in conjunction with other information developed in its formal record when considering whether to approve the application for a Permit to Construct Electrical Facilities with Voltages between 50 kV and 200 kV that the Applicant submitted on December 29, 2010.

The Draft EIR published in January 2012 detailed the Project, evaluated and described the potential direct, indirect, and cumulative environmental impacts associated with the construction, operation, and maintenance of the Project, identified those impacts that could be significant, and presented mitigation measures, which, if adopted by the CPUC or other responsible agencies, could avoid or minimize these impacts. The Draft EIR also evaluated alternatives to the Project, including the No Project Alternative, as required by CEQA. A digital copy of the Draft EIR is included on a CD inside the front cover of this document. A digital copy of this Final EIR is included on the same CD.

1.2 Project Overview

SCE proposes to construct, operate, and maintain a 66/12 kV unattended, automated, 56 megavolt-ampere low-profile substation (the Falcon Ridge Substation) on an approximately 2.7 acres located just south of Casa Grande Avenue, east of Sierra Avenue, north of Summit Avenue and adjacent to SCE's existing transmission right-of-way (ROW), in the City of Fontana, California. SCE would establish vehicular access to the proposed substation site from Sierra Avenue. In addition to the proposed substation, the Project would include the installation of two subtransmission source line segments; construction of new underground vaults, which also are referred to as "distribution getaways"; telecommunications (fiber-optic) infrastructure work; and upgrades to existing optical communications equipment at Etiwanda, Alder, and Randall substations.

Two independent 66 kV subtransmission source line segments would be installed to connect the proposed Falcon Ridge Substation to the existing Alder and Etiwanda substations. One segment would be approximately 3 miles in length to form the new Alder 66 kV Subtransmission Source

Line; the other would be approximately 9 miles in length to form the new Etiwanda 66 kV Subtransmission Source Line.

Within the substation site, distribution circuits would be placed in an underground conduit system. Outside the substation walls, three new underground 12 kV distribution “getaways” would be constructed. The first getaway would exit the substation property boundary to the west for approximately 600 feet where a new vault would be installed. It would continue approximately 530 feet and then terminate in a new vault located within Sierra Avenue. The second getaway would exit the substation property boundary to the west for approximately 600 feet where a new vault would be installed. It would continue for approximately 635 feet and terminate by being capped for future use. The third getaway would exit north from the substation approximately 200 feet where a new vault would be installed. It would continue approximately 540 feet and terminate in a new vault located within the future Casa Grande Avenue.

Telecommunications infrastructure work (overhead and underground) would connect the proposed substation to nearby substations. One new fiber-optic cable route would connect the Falcon Ridge Substation to the existing Alder Substation and one new fiber-optic cable route would connect the Falcon Ridge Substation to the existing Etiwanda Substation. New fiber-optic equipment would be installed at the proposed substation. Upgrades to existing fiber-optic communications equipment would occur at the existing Etiwanda, Alder, and Randall substations. All communications equipment installations and upgrades would occur within the proposed Mechanical and Electrical Equipment Room at the Falcon Ridge Substation or within existing structures at the existing Etiwanda, Alder, and Randall substations.

The purposes of the Project are to improve the reliability and system operational flexibility of the existing electrical system serving the portions of the cities of Rancho Cucamonga, Fontana, and Rialto, as well as adjacent areas of San Bernardino County (the “electrical needs area”) that are shown in Draft EIR Figure 2-1 (page 2-2). Two existing substations (the Alder and Randall substations) currently provide electrical service to approximately 46,000 metered customers and are presently at or near their operating capacity. Therefore, SCE is proposing to construct a new 66/16 kV substation to meet the electrical needs and be operational by the Summer of 2014.

1.3 Organization of the Final EIR

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

- (a) The Draft EIR or a revision of the draft;
- (b) Comments received on the Draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies that commented on the Draft EIR;
- (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 Project contains information in response to concerns that were raised during the public comment period (January 26, 2012 through March 12, 2012). In addition to the Draft EIR, which is contained on the CD located inside the front cover of hard copies of this document, the Final EIR contains three chapters and several appendices:

- **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 Project.
- **Chapter 2** describes the organization of the comment letters and summary of the oral comments made at the public meeting, as well as the coding system used to identify individual comments. It also describes the organization of the responses to the comments received on the Draft EIR, and includes a list of all agencies, organizations, and individuals that submitted comments.
- **Chapter 3** contains all text changes to the Draft EIR which include both (1) changes to correct errors or to clarify information presented in the Draft EIR, and (2) text changes as a result of responding to comments.
- **Appendices** that provide supporting documentation for information presented in the Final EIR.

CHAPTER 2

Comments and Responses

This chapter lists the public agencies, organizations, and individuals who provided comments on the Draft EIR, provides copies of written comments received, and responds to those comments. As required by CEQA, these responses to comments address significant environmental issues raised (Pub. Res. Code §21091(d); CEQA Guidelines §§15088(a), 15132).

2.1 Opportunities for Public Comment on the Draft EIR

2.1.1 Notification

On January 26, 2012, 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 Project. The NOA solicited both written and oral comments on the Draft EIR during a 45-day comment period (January 26, 2012 through March 12, 2012), and provided information on a forthcoming public comment meeting. Additionally, the NOA presented the background, purpose, description, and location of the Project, as well as the contact name to request additional information about the Project.

In addition to the NOA, the CPUC notified the public about the public comment meeting through multiple newspaper legal advertisements and the Project website. The CPUC published legal advertisements in the Inland Valley Daily Bulletin on January 30, 2012 and February 6, 2012; and in the Fontana Herald News on February 3, 2012. The Inland Valley Daily Bulletin and the Fontana Herald News are daily newspapers 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/falconridge/index.html>. The NOA, newspaper legal advertisements, and the Project website are provided in Appendices A, B, and C, respectively. Notifications provided basic Project information, the date, time, and location of the public comment meeting, and a brief explanation of the public meeting process. The public was encouraged to submit written comments and concerns regarding the Project and the adequacy of the Draft EIR by mail, facsimile, or email to the CPUC.

2.1.2 Public Comment Meeting

The CPUC conducted a public comment meeting on February 16, 2012, at 6:00 p.m. at Summit High School, 15551 Summit Avenue, Fontana, California. Members of the public and representatives of the CPUC and its environmental consultant, ESA, attended the public comment

meeting. Meeting attendees were encouraged to sign in, and materials including presentation slides, a comment card, copies of the NOA, and a speaker card were made available.

A presentation was given at the meeting that included an overview of the CPUC's decision-making process, including the environmental review process; the regional context, Project background, Project objectives, Project description, Project alternatives, and role of the public comments. Following the presentation, public comments were taken. All attendees were encouraged to submit written comments.

2.2 Comments on the Draft EIR

2.2.1 Written Comments

Twelve (12) comment letters were received during and after the Draft EIR review period, including one from the applicant, seven from public agencies, and four from organizations and individuals. The comment letters received on the Draft EIR are listed below in Section 2.4. Each comment letter has been assigned an alphabet letter and a comment number designating order of receipt within each of the categories identified above. The letter from the applicant is designated with a capital "A," agency letters are designated with the letter "B," and organizations' and individuals' letters are designated by the letter "C." For example, the third letter received from an agency was from the California Department of Fish and Game (CDFG), and is identified as letter B-3. Individual comments within letters are marked sequentially with numbers, such as B-3.1, B-3.2, etc. Copies of all letters received are provided below.

2.2.2 Public Meeting Comments

As noted above, a public meeting was held on Thursday, February 16, 2012, at 6:00 p.m. at Summit High School. Notes summarizing oral comments made by the four individuals who spoke at the public meeting are provided below. Oral comments are designated by the letter "D." Comments of the first speaker are designated D-1, the second speaker's comments are designated D-2, and so on. 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 Responses to Comments

As required by CEQA, the responses to comments provided in this chapter address significant environmental issues raised during the review period (Pub. Res. Code §21091(d); CEQA Guidelines §§15088(a), 15132). They are intended to provide clarification and refinement of information presented in the Draft EIR and, in some cases, to correct or update information in the Draft EIR. In some instances, the text of the Draft EIR has been revised in response to a comment, and the revised text is included as part of the response. Where responses have resulted in changes to the text of the Draft EIR, these changes are shown within the Draft EIR text using the following conventions:

- 1) Text added to the wording in the Draft EIR is shown in underline,
- 2) Text deleted from the wording in the Draft EIR is shown in ~~strikeout~~, and
- 3) Text changes are shown in indented paragraphs.

These text changes also appear in Chapter 3, *Revisions to the Draft EIR*, of this document.

Some of the comments received on the Draft EIR did not address the adequacy or accuracy of the environmental analysis or did not identify any other significant environmental issue requiring a response; rather, these comments were directed toward the perceived merits or demerits of the Project, provided information, or expressed an opinion without specifying why the Draft EIR analysis was inadequate. The CPUC, as the CEQA lead agency, acknowledges the receipt of these types of comments; however, limited responses are provided to these comments as they do not relate to the adequacy or accuracy of the Draft EIR or otherwise raise significant environmental issues.

A number of written comments submitted on the Draft EIR raised the same or similar questions. Rather than repeat responses to such comments, the CPUC is providing a comprehensive discussion of the issues and related topics as Master Responses in Section 2.5. Individual responses to each of the comments received are provided in Section 2.6 and refer to the Master Responses for further detailed discussion and technical information as appropriate. The Master Response topics are summarized briefly below:

- Master Response 1 (MR1): Alternative 1/Environmentally Superior Alternative and the Portion of the B.F. Goodrich Superfund Site Now Occupied by Rialto Concrete Products
- MR2: Flood Control District ROW Alternative (New Alternative)
- MR3: Underground vs. Overhead Lines
- MR4: Project Design Change: New Staging Areas

2.4 List of Commenters

Table 2-1 lists all who provided written or oral comments on the Draft EIR.

**TABLE 2-1
COMMENTERS ON THE FALCON RIDGE SUBSTATION PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT**

Comment Letter	Commenter	Date
Applicant – Written Comments		
A-1	Southern California Edison	February 29, 2012
Agencies – Written Comments		
B-1	California Department of Transportation, Daniel Kopulsky, Office Chief, Community Planning/IGR-CEQA	February 1, 2012
B-2	California Department of Toxic Substances Control, Greg Holmes, Unit Chief, Brownfields and Environmental Restoration Program	February 15, 2012
B-3	California Department of Fish and Game, Jeff Brandt, Senior Environmental Scientist	March 12, 2012
B-4	South Coast Air Quality Management District, Ian MacMillan, Program Supervisor, CEQA Inter-Governmental Review	March 9, 2012
B-5	City of Fontana, Charles D. Fahie, Senior Planner	March 9, 2012
B-6	City of Rialto, Gina M. Gibson, Senior Planner	March 12, 2012
B-7	Fontana Unified School District, Robert Copeland, Director-Facilities Planning, Design, Construction, Maintenance and Operations	January 27, 2012
Organizations and Individuals – Written Comments		
C-1	Lewis Operating Corporation, LLC, Garth Chambers	February 7, 2012
C-2	Hall & Foreman, Inc., John Hogan, CEO/Principal	February 24, 2012
C-3	Gresham, Savage, Nolan & Tilden, John. C. Nolan, on behalf of the J.W. Mitchell Company, LLC	March 9, 2012
C-4	The KTI Group of Companies and Rialto Concrete Products, Jerry Cowden	March 9, 2012
Public Meeting Comments		
D-1	Oswald Realegeno	February 16, 2012
D-2	John Hogan, CEO/Principal, Hall & Foreman, Inc.	February 16, 2012
D-3	Greg Lanz, City of Rialto	February 16, 2012
D-4	Charles Fahie, City of Fontana	February 16, 2012

2.5 Master Responses

2.5.1 MR1: Alternative 1/Environmentally Superior Alternative and the Portion of the B.F. Goodrich Superfund Site Now Occupied by Rialto Concrete Products

Commenters and Comments Addressed by MR1

Commenter	Comments Addressed by MR1
SCE	A-1.1 through A-1.9, A-1.21, A-1.64 through A-1.67, A-1.100, A-1.122, A-1.123, A-1.129, A-1.176 through A-1.180
City of Fontana	B-5.4
City of Rialto	B-6.3
KTI Pipe Group (Rialto Concrete Products)	C-4.1 through C-4.6
Greg Lanz, City of Rialto	D-3.1

Summary of Issues Raised

- A. Whether the fact that the B.F. Goodrich Superfund Site underlies rather than is adjacent to the Rialto Concrete Products site materially affects the Draft EIR's analysis of the environmental effects of Alternative 1.
- B. Whether the Environmentally Superior Alternative is feasible under CEQA

Response

A. The fact that the B.F. Goodrich Superfund Site underlies the Rialto Concrete Products site does not materially affect the Draft EIR's analysis of the environmental effects of Alternative 1.

The B.F. Goodrich Superfund Site (EPA ID. #: CAN000905945) (the "Goodrich site") is described in Draft EIR Section 4.9, *Hazards and Hazardous Materials* (p. 4.9-2 et seq.) as a 160-acre area in an industrial area of Rialto that includes groundwater and soil contaminated primarily with the perchlorate anion and the volatile organic compound (VOC) trichloroethene (TCE). The perchlorate anion and TCE may cause adverse effects on human health (see, e.g., 76 FR 7762-01 relating to perchlorate; and EPA, 2007, relating to TCE).¹ The Goodrich site is bound by West Casa Grande Avenue to the north, Locust Avenue to the east, Alder Avenue to the west, and an extension of Summit Avenue to the south. The Goodrich site also is located in the Rialto-Colton Groundwater Basin, which in recent years has supplied more than 8 million gallons of drinking water per day in and near the Project Area (EPA, 2012).²

¹ EPA, 2007. Trichloroethylene (TCE) TEACH Chemical Summary. Available online: http://www.epa.gov/teach/chem_summ/TCE_summary.pdf (September 20, 2007).

² EPA, 2012. U.S. EPA Pacific Southwest, Region 9: Superfund, 2012. B.F. Goodrich. Available online: <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dec8ba3252368428825742600743733/7919062634654eee8825757400661412!OpenDocument> (Jan. 24, 2012).

A portion of the Goodrich site now is occupied by Rialto Concrete Products, whose property would be crossed by Alternative 1. To clarify the location of the Goodrich site relative to Alternative 1, three changes have been made to the text of the Draft EIR. First, the second sentence of the second paragraph on page 3-12 of the Draft EIR has been revised as follows:

It also has the potential to cross areas of higher fire hazard classification than the Project alignment and would cross the Rialto Concrete Products site, which occupies a portion of the area that is the subject of the B.F. Goodrich Superfund Site cleanup plan ~~be adjacent to three sites listed on the USEPA's CERCLIS database of contaminated sites.~~

Second, the last sentence of the bullet point at the bottom of page 4.9-2 in Draft EIR Section 4.9.1 has been revised as follows:

This site is located approximately 0.75 mile east of the proposed Falcon Ridge Substation, 0.9 mile north of the proposed Alder Subtransmission Source Line Route, and would be crossed by ~~adjacent to~~ the Alternative Source Line Route.

Third, the second sentence under the subheading “Alternative 1: Lowell Street Realignment Alternative” at the top of page 4.9-27 in Draft EIR Section 4.9.5 has been revised as follows:

The alternative alignment of the Alder Subtransmission Source Line and Fiber Optic Cable Route would cross the Rialto Concrete Products site, which occupies a portion of border on three sides the 160-acre contaminated area that is the subject of the B.F. Goodrich Superfund Site cleanup plan (Figure 4.9-1).

Since 2002, the Santa Ana Regional Water Quality Control Board, EPA, and the Department of Toxic Substances Control have been involved in efforts toward remediation of the Goodrich site. EPA added the site to the Superfund National Priorities List in September 2009 and, in September 2010, adopted a plan (an “Interim Record of Decision”) to begin cleanup of contaminated groundwater (EPA, 2010).³

The EPA’s Interim Record of Decision is focused solely on the remediation of contaminated groundwater, which is the initial priority for the cleanup of the Goodrich site. Nonetheless, as discussed below, soil and soil gas testing has occurred on the portion of the Goodrich site that would be crossed by Alternative 1. For example, ENVIRON International Corporation (Environ) completed a *Final Remedial Investigation Report* for the Goodrich site in February 2010 (Environ, 2010) that documents investigations of study areas where perchlorate and/or TCE use was known or suspected to have occurred. Environ’s report is included in this Final EIR as Appendix F, *B.F. Final Remedial Investigative Report, B.F. Goodrich Site*.

³ U.S. EPA (EPA), 2010. USEPA Superfund Interim Action Record of Decision [for] Source Area Operable Unit B.F. Goodrich Superfund Site San Bernardino County, CA EPA ID: CAN000905945. Available online: [http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/f03db7a027c1e568882577b4006a02fc/\\$FILE/EPA_BF%20Goodrich%20Superfund%20Site%20Record%20of%20Decison.pdf](http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/f03db7a027c1e568882577b4006a02fc/$FILE/EPA_BF%20Goodrich%20Superfund%20Site%20Record%20of%20Decison.pdf) (Sept. 30, 2010).

Two Goodrich Site Study Areas would be crossed by Alternative 1.

As shown on Draft EIR Figure 4.9-1 (p. 4.9-3), Rialto Concrete Products currently occupies a portion of the Goodrich site. As clarified in Final EIR Figure 2-1, *B.F. Goodrich Superfund 160-acre Site Boundary*, Alternative 1's subtransmission line would cross the portion of the Rialto Concrete Products property that is referred to in the *Final Remedial Investigation Report* prepared for the Goodrich site (Environ, 2010)⁴ as Study Areas 47 and 48 (the "Southwest Disposal Pits").

The Southwest Disposal Pits are believed to have been used for waste disposal. Study Area 47, the northern-most pit, was sampled in 2004 and again in 2006. In 2004, no perchlorate or TCE was detected in soil samples collected from four boring locations, and no TCE was detected in soil gas analyzed at 17 locations (Environ, 2010, Table 1). Most of these soil and soil gas samples were collected outside the footprint of the disposal pit (Environ, 2010). In 2006, samples were collected from a trench within the footprint of the disposal pit. Perchlorate was detected in all 12 samples at depths ranging between 3.5 and 15 feet below ground surface and at concentrations ranging between 1,700 and 9,000 ppb (Environ, 2010, Table 1; Environ, 2010). Although four of those samples also were tested for TCE, no TCE was detected (Environ, 2010).

Fireworks manufacturers previously disposed of waste in Study Area 48, which is located in the middle and southern end of the Southwest Disposal Pits. In 2006, 27 soil samples were collected from three trenches and two borings; perchlorate was detected in 22 of the samples at depths ranging between 5 and 25 feet below ground surface and at concentrations ranging between 22 and 3,900 ppb (Environ, 2010, Table 1; Environ, 2010). Of the 27 soil samples, 17 were analyzed for TCE; no TCE was detected (Environ, 2010). In sum, perchlorate (but no TCE) has been detected in the Southwest Disposal Pits.

Existing perchlorate contamination underlying the Rialto Concrete Products site does not materially affect the Draft EIR's analysis of the environmental effects of Alternative 1 related to hydrology and water quality.

There are no surface waters, such as perennial streams, rivers, or natural wetlands within the Goodrich site (EPA, 2010). The depth to contaminated groundwater in the area is approximately 400 to 450 feet below the surface of the ground (EPA, 2010). As explained in Draft EIR Section 4.9.4 (p. 4.9-19), "because local groundwater is more than 400 feet deep, the potential to encounter contaminants migrating in groundwater during the near-surface Project excavations would be low." Because of the absence of surface waters and significant depth to groundwater in the area that would be affected by Alternative 1, no incremental increase in the potential for hydrology and water quality impacts would occur as a result of encountering contaminated soils during construction.

⁴ ENVIRON International Corporation (Environ), 2010. Final Remedial Investigation Report, B.F. Goodrich Site, Rialto, California. Available online: [http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/1d0cb63e1db6b233882576fe005e4cf9/\\$FILE/2009%20RI%20\(Unsecured\).pdf](http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/1d0cb63e1db6b233882576fe005e4cf9/$FILE/2009%20RI%20(Unsecured).pdf) (February 2010).

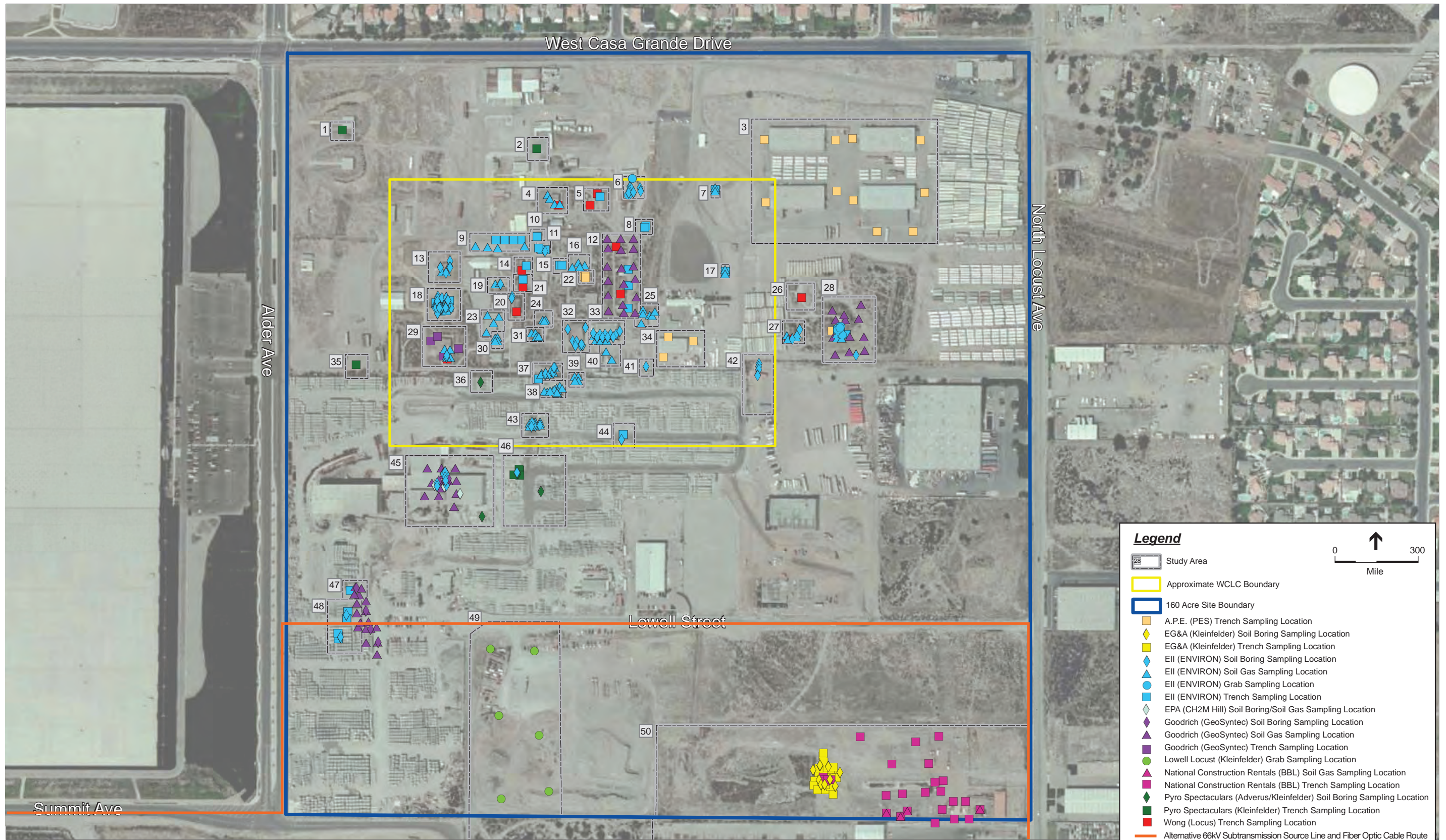
As stated in Draft EIR Section 4.10.2 (p. 4.10-15), the evaluation of significance criterion a) would determine that a significant hydrology- or water quality-related environmental effect would occur if the Project or an alternative (such as Alternative 1) would “violate any water quality standards or waste discharge requirements.” As analyzed in Draft EIR Section 4.10.5 (p. 4.10-21), the implementation of Alternative 1, prior to the implementation of mitigation measures, could result in increased potential hydrology and water quality impacts; however, following the implementation of mitigation measures and regulatory controls independently required of Alternative 1 by the existing, equally applicable regulatory framework described in Section 4.10.1, the residual impacts of Alternative 1 to hydrology and water quality would be the same as the Project.⁵ The presence of existing groundwater contamination at 400 to 450 feet below ground surface would not substantially affect Alternative 1’s potential to violate water quality standards or waste discharge requirements.

Existing perchlorate contamination underlying the Rialto Concrete Products site does not materially affect the Draft EIR’s analysis of the environmental effects of Alternative 1 related to Hazards and Hazardous Materials.

The Remedial Investigation/Feasibility Investigation prepared by the EPA for the Goodrich site that was cited and relied upon in the Draft EIR (see, e.g., p. 4.9-19) suggests that residual soil contamination caused by historical use of the area by the U.S. Army could be encountered during construction of the proposed substation and Alder Subtransmission Source Line Route. The potential to encounter contaminated soil during Project construction excavation and grading was determined to be “relatively low” (Draft EIR Section 4.9.4, p. 4.9-19). In any event, construction workers would be instructed as part of the Worker Environmental Awareness Program (WEAP) described in Draft EIR Section 2.8.3 (p. 2-17) about the procedures to follow in the event unanticipated soil contamination is encountered. Suspect soil would need to be segregated, sampled, and disposed of in accordance with all applicable regulations. Further, Mitigation Measure 4.9-1 would require that a site-specific Health and Safety Plan be prepared and implemented that addresses the potential to encounter hazardous materials in soil. With implementation of this measure, the Draft EIR concluded that the potential impact of the Project to public health or the environment would be less than significant (Draft EIR Section 4.9.4, p. 4.9-19).

Alternative 1 is the same as the proposed Project except for the alignment of the Alder Subtransmission Source Line route (see, Draft EIR Section 3.4.1, p. 3-11). Unlike the proposed Project, the Alternative 1 subtransmission source line route would cross Goodrich site Study Areas 47 and 48, which are located within the Rialto Concrete Products property boundary. The Goodrich site, including the portion now occupied by Rialto Concrete Products, is listed pursuant to Government Code section 65962.5.

⁵ See Draft EIR page 4.10-18 for a summary of how the existing regulatory regime would minimize or eliminate the potential water quality impacts associated with construction activities in the context of the proposed Project. The rationale applies equally in the context of Alternative 1.



SOURCE: Environ, 2010

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Draft EIR Section 4.9.5 (p. 4.9-27) analyzes whether the construction, operation, and maintenance of Alternative 1 would create a significant hazard to the public or the environment because of its listing status pursuant to Government Code section 65962.5. It would not. The construction and maintenance of Alternative 1 would result in a low risk of worker exposure to perchlorate. Workers in contaminated areas generally may be exposed to, and thereby affected by, the contamination in three primary ways, depending on the nature of the contamination: by ingestion (eating or drinking), inhalation (breathing), or adsorption through the skin. For perchlorate, exposure to contaminated potable water is the primary concern. As explained by the Agency for Toxic Substances and Disease Registry, perchlorate is not volatile, meaning that it does not become a gas, and so is not considered an inhalation hazard (ATSDR, 2009).⁶ Also, because it is an inorganic ion, perchlorate is not readily absorbed by the skin (Id.). As disclosed in Draft EIR Section 2.9.15 (p. 2-38), water to be used during construction for drinking, hand washing, and clean up would be brought to the site. There are no surface waters within the Goodrich site that possibly could be used for domestic purposes (EPA, 2010), and drinking water would not be supplied by contaminated wells. No other pathways of exposure are likely given the nature of perchlorate. Consequently, the potential risk of worker exposure to perchlorate contamination during the construction or maintenance of Alternative 1 would be low.

The construction and maintenance of Alternative 1 also would result in very low risk of worker exposure to TCE. No TCE has been detected within the footprint of Alternative 1, work would occur within the Goodrich site segment of Alternative 1 for a relatively short portion of the overall 12-month construction schedule, and the implementation of Mitigation Measure 4.9-1 would reduce the potential effect to exposure to existing contamination to a less-than-significant level. No data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts is offered to refute the EIR's conclusion that the implementation of the Health and Safety Plan that would be required by Mitigation Measure 4.9-1 would reduce the potential effect of exposure to contaminated soil to a less-than-significant level whether Alternative 1 crosses over or is adjacent to the Government Code section 65962.5-listed site. As detailed in Mitigation Measure 4.9-1, the Health and Safety Plan would have to be prepared in accordance with applicable regulations before the Applicant and/or its contractors could be authorized to proceed with construction: "The health and safety plan shall identify the chemicals potentially present in soil, health and safety hazards associated with those chemicals, monitoring to be performed during site activities, soil handling methods required to minimize the potential for harmful exposures, appropriate personnel protective equipment, and emergency response procedures." Any plan that meets these basic requirements would be sufficiently protective of human health and the environment. Consequently, no substantially greater impact would result from the implementation of Alternative 1 within, rather than adjacent to, the Goodrich site.

⁶ Agency for Toxic Substances and Disease Registry (ATSDR), 2009. Public Health Assessments & Health Consultation: Perchlorate Contamination in the Citizens Utilities' Suburban and Security Park Water Service Areas, Aerojet-General Corporation Rancho Cordova, Sacramento County, California. Available online: <http://www.atsdr.cdc.gov/hac/pha/PHA.asp?pg=2&docid=4>. (September 23, 2009).

Existing contamination underlying the Rialto Concrete Products site does not materially affect the Draft EIR's analysis of the environmental effects of Alternative 1 related to Air Quality.

Volatile organic compounds volatilize (e.g., evaporate or sublimate) from groundwater and soils and enter the surrounding air where they can affect human health and air quality. The specific VOCs at issue within the Goodrich site as a whole include TCE and tetrachloroethene, which have been identified by the State of California as carcinogenic TACs. Recent soil vapor remedial investigations at the site have focused on TCE because it is the VOC that has been detected most frequently and at the highest concentrations in groundwater at the site (Environ, 2010). As noted above, TCE has not been detected in the area of the Goodrich site that would be crossed by Alternative 1. However, as disclosed in the Draft EIR Section 4.9.5 (p. 4.9-27), there is a greater likelihood of encountering soil contamination during construction activities of Alternative 1 compared to the Project. Any effects that could result from the volatilization of contaminants present in Goodrich site soils would be addressed by appropriate management of the soils. Implementation of Mitigation Measure 4.9-1 also would address potential air quality-related impacts of soil disturbance associated with Alternative 1 because it would require a site-specific Health and Safety Plan to be prepared and implemented that addresses the potential to encounter hazardous materials in soil.

The Draft EIR analyzes potential effects to air quality of the Project and alternatives, including Alternative 1, in Section 4.3 (p. 4.3-1 et seq.). As described in Draft EIR Section 4.3.1 (p. 4.3-6), the sensitive receptors identified for purposes of analyzing impacts of the Alder Subtransmission Source Line Route of Alternative 1 include a residence south of West Bohnert Avenue that would be approximately 100 feet from the route, residences north of West Bohnert Avenue and south of Persimmon Avenue that would range between 350 to 650 feet from the route, and a residential development along Locust Avenue north of Persimmon Avenue would be approximately 650 feet from the route. However, it should be noted that the closest sensitive receptors to the portion of Alternative 1 that would cross the Goodrich site are approximately 0.5 mile to the east, just west of Maple Avenue. At this distance, any short-term exposure to volatilized contaminants during construction activities at the Goodrich site would be negligible.

Remediation of the Goodrich site is ongoing.

Since the adoption of the Interim Record of Decision, additional cleanup work has occurred. More recently, the EPA installed two 900-foot multi-level groundwater monitoring wells. Initial results were expected in February or March 2012 (EPA, 2012).

Comments suggest that the development, adoption, and implementation of a final Record of Decision for the Goodrich site at some point in the future could include new or modified Remedial Action Objectives relative to those presented in the interim decision. However, none of the comments received on the Draft EIR provides any evidence that the construction, operation and maintenance of a subtransmission source line segment across a portion of the Goodrich site would cause additional impacts associated with a final decision about remediation of the superfund site, and CEQA precludes the CPUC from speculating in this regard.

B. Information learned subsequent to issuance of the Draft EIR may raise feasibility concerns regarding the Environmentally Superior Alternative 1 identified in the Draft EIR.

Based on the analysis in the Draft EIR, Alternative 1 was determined to be the Environmentally Superior Alternative (see, Draft EIR Section ES.1, p. ES-1; Section ES.5, p. ES-7 et seq.; Section 5.3, p. 5-3 et seq.; and Section 5.4, p. 5-5 et seq.). The route that would be taken by Alternative 1 is described in Draft EIR Table 3-2 (p. 3-6) as extending north from the Alder Substation, spanning I-210 and paralleling Locust Avenue until Lowell Street. At that point, the route would extend west along Lowell Street and continue past the end of Lowell Street to N. Alder Avenue. From there, it would extend south along N. Alder Avenue to Summit Avenue, west along Summit Avenue to Mango Avenue, and then north along the future Mango Avenue ROW until it reaches the proposed substation site. This route is shown in Draft EIR Figure 3-1 (p. 3-14).

Comments and concerns have been raised about whether the Lowell Street portion of the route is feasible. Although Alternative 1 (including the Lowell Street portion of the route) was determined in the Draft EIR to be potentially feasible, broader considerations come into play when a decision-making body is considering actual feasibility. For example, in *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000, the court held that the City was legally justified in rejecting environmentally superior alternatives identified in a Draft EIR as infeasible based on its determination that they were undesirable from a policy perspective.

“Feasible” is defined for purposes of CEQA as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (Pub. Res. Code §21061.1; 14 Cal. Code Regs. §15364). A determination of infeasibility may be based on specific technological, social, economic, environmental, or legal considerations. Other considerations, such as practicality, policy, or the provision of employment opportunities for highly trained workers, also may provide a basis to find that an alternative is infeasible (Pub. Res. Code §21081(a)(3); 14 Cal. Code Regs. §15091(a)(3)). Further, the courts have explained that the CEQA concept of feasibility encompasses “‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors” (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998).

As noted above, the Lowell Street portion of Alternative 1 would cross a portion of the Goodrich site now privately owned, operated, and controlled by Rialto Concrete Products and the KTI Pipe Group of Companies (collectively, “Rialto Concrete Products” or “Company”). The CPUC consulted with Rialto Concrete Products regarding potential impacts of Alternative 1 on its business on May 1, 2012. Information learned from the Company and other sources subsequent to the publication of the Draft EIR may raise issues for CPUC consideration outside of this CEQA document.

Before 2008, there were approximately five suppliers of precast pipe products in Southern California. Following the economic downturn, only two remain: Rialto Concrete Products and Rinker Materials Corporation in Corona. The next closest supplier of the types of highly

specialized precast pipe products manufactured and sold by Rialto Concrete Products is in Las Vegas, Nevada. Approximately 90 percent of Rialto Concrete Products' current customers are branches of the government, including the state, counties, cities, and flood control districts; commercial entities make up the remaining approximately 10 percent. If Rialto Concrete Products ceased to operate, it may be difficult for its government agency customers to locally source necessary building materials without having to go through the additional procedural requirements necessary to contract sole source. Any resulting delays could affect the duration of infrastructure projects and local employment. Any increase in the transport distance of such materials (e.g., from Nevada) could result in substantial increased fuel use, air emissions, noise, and traffic impacts within California that could be avoided by maintaining local competitive sourcing options.

In order to accommodate existing demands for its specialized pipe products, the Company needs to have access to and use of its entire site at ground level and overhead. See, e.g., Comment C-4.1, which states: "Our operations require every inch of land currently in use." Construction, operation, and maintenance of an overhead subtransmission line that, under Alternative 1, would bisect the property with 9.5 acres on one side of the line and 12 acres on the other effectively would remove some portion of Rialto Concrete Products' site from active business use. Forklifts, mobile cranes, and other equipment would have to maneuver around obstacles (poles) and negotiate clearance from overhead wires. Having to maintain the necessary clear area around poles would reduce the area that otherwise would be used for materials storage. As stated in Comment C-4.3, mobile cranes essential to Rialto Concrete Products' business require 40 to 60 feet of overhead clearance. Alternative 1's subtransmission source line would be in the way. Construction underground of the Lowell Street segment also would not be a viable option (see MR3 regarding undergrounding, and Comment C-4.5 regarding the weight-bearing load requirements to place the line underground beneath Rialto Concrete Products' operations).

If it is found that Rialto Concrete Products provides a substantial contribution to the local economy, and that a contribution that could be put at risk if Alternative 1 were implemented, this could provide a basis to determine that Alternative 1 is infeasible (Pub. Res. Code §21081(a)(3); 14 Cal. Code Regs. §15091(a)(3)). Rialto Concrete Products has been listed one of the City of Rialto's "25 largest sales tax generators" (City of Rialto, 2011)⁷ and as one of the City's "top employers" (City of Rialto, 2008)⁸. Rialto Concrete Products generates between 1 and 2.5 million dollars of revenue for the city annually, and employs approximately 100 people. Based on data from the U.S. Bureau of Labor Statistics, the unemployment rate in the City of Rialto was 15.2 percent in May 2012 (U.S. Bureau of Labor Statistics, 2012)⁹. By comparison, the unemployment rate statewide that month was 10.4 percent (California Employment Development

⁷ City of Rialto, 2011. 25 Largest Sales Tax Generators. Available online: http://www.rialtoca.gov/finance_608.php (rev. May 10, 2011).

⁸ City of Rialto, 2008. Top Employers in the City of Rialto. Available online: http://www.rialtoca.gov/redevelopment_794.php (rev. December 10, 2008).

⁹ U.S. Bureau of Labor Statistics, 2012. Unemployment Rate – Not Seasonally Adjusted [sorted for City of Rialto]. Provided by Google Public Data Explorer. Available online: http://www.google.com/publicdata/explore?ds=z1ebjgk2654c1_&met_y=unemployment_rate&idim=city:CT064900&fdim_y=seasonality:U&dl=en&hl=en&q=unemployment+rate+in+city+of+rialto,+ca (July 11, 2012)

Department, 2012)¹⁰. The mortgage crisis being felt nationwide is particularly acute in San Bernardino County, where 43.4 percent of homeowners have a mortgage that is underwater; the City of Fontana is particularly hard hit (Wall Street Journal, 2012)¹¹. A loss of jobs at Rialto Concrete Products' manufacturing plant and storage facility could take a serious toll on the already struggling economy in the Project Area. Because it is appropriate to consider "social and economic realities in the region" in evaluating whether to reject a project alternative as infeasible, the Commission could conclude that Alternative 1 is infeasible. See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417, where the court found that San Diego properly considered and reasonably rejected as infeasible Del Mar's proposed project alternatives based on regional social and economic realities.

Rialto Concrete Products provides employment opportunities for highly trained workers, the potential loss of which could provide a basis to determine that Alternative 1 is infeasible (Pub. Res. Code §21081(a)(3); 14 Cal. Code Regs. §15091(a)(3)). Positions at Rialto Concrete Products require specialized training and particular expertise. For example, it requires years of in-house training to become an appropriately skilled pipe machine operator or fork lift operator. Technical schools and similar positions in other industries do not prepare such equipment operators to address the Company's typical load demands. Forklift operators at Rialto Concrete Products typically move loads that weigh up to 80,000 lbs. By comparison, forklift operators who move pallets of bricks transfer loads weighing closer to 2,000 lbs. (532 bricks to a pallet multiplied by approximately 4.5 lbs per brick equals 2,394 lbs). A pallet of concrete blocks weighs approximately 3,600 lbs (assuming 90 8x8x16 blocks at 40 lbs each). Crane operators in other industrial situations typically operate 3- to 5-ton cranes; by comparison, crane operators at Rialto Concrete Products operate 25- to 50- ton cranes and frequently do so to accomplish very heavy overhead carries. The specialized training required to work at Rialto Concrete Products makes this segment of the workforce particularly valuable to the region as well as the Company.

As a practical matter, implementation of Alternative 1 could be enough to put Rialto Concrete Products out of business.

In summary, comments and concerns raised since the Draft EIR was issued call into question the feasibility of Alternative 1 for a variety of socioeconomic and policy reasons. The Commission could rely on these reasons separately or collectively to determine that Alternative 1 is not feasible. Such a decision would leave an equally environmentally superior alternative (the Flood Control District ROW Alternative), the Project, and the No Project alternatives available for consideration and decision.

¹⁰ California Employment Development Department, 2012. Historical Civilian Labor Force, California (June 15, 2012). Report generated via link from the Department's website: <http://www.labormarketinfo.edd.ca.gov/Content.asp?pageid=164>.

¹¹ Wall Street Journal, 2012. California Mortgage Seizures Could Affect \$7 Billion in Bonds, Fitch Says. (July 9, 2012).

2.5.2 MR2: Flood Control District ROW Alternative (New Alternative)

Commenters and Comments Addressed by MR2

Commenter	Comments Addressed by MR2
Hall & Foreman, Inc., John Hogan, CEO/Principal	C-2.1
Hall & Foreman, Inc., John Hogan, CEO/Principal	D-2.1

Summary of Issues Raised

- A. Whether a new alternative could be feasible that would reduce potential environmental effects relative to the Project.
- B. If so, what environmental effects could result from the construction, operation, and maintenance of the new alternative?
- C. How would the potential environmental effects of the new alternative compare to those of the proposed Project?
- D. Would consideration of the new alternative require circulation for agency and public comment?

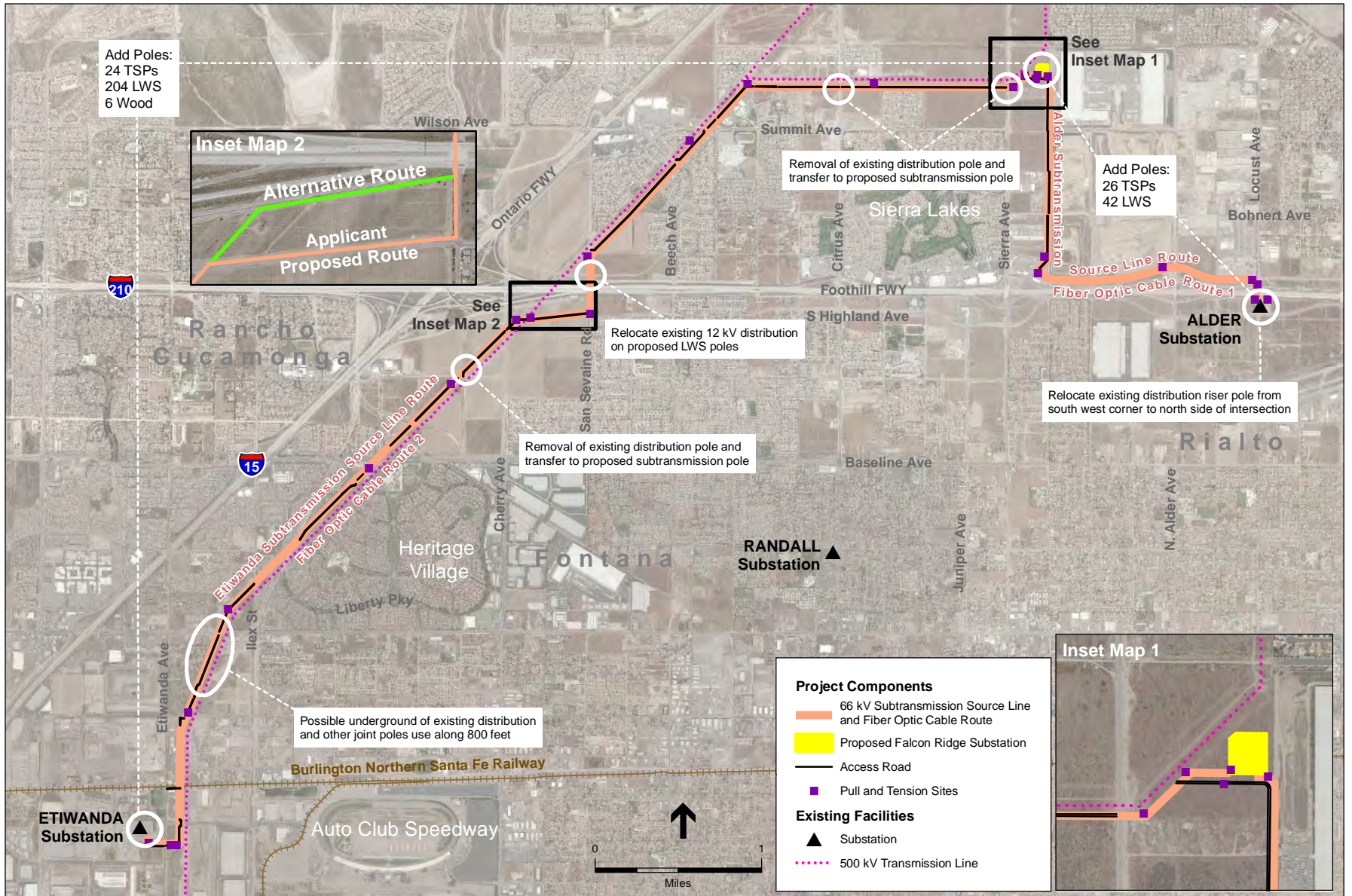
Response

A. A new alternative – the Flood Control District ROW Alternative – has been identified and could be feasible.

Introduction

The CEQA Guidelines recognize that comments on a Draft EIR are “most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects” (14 Cal. Code Regs. §15204(a)). In its oral and written comments on the Draft EIR, Hall & Foreman Inc. and Intex Properties Inland Empire Corporation (collectively, “Intex”) proposed a variation of the alignment for the proposed 66 kV subtransmission line in the vicinity of South Highland Avenue and San Sevaine Road in Fontana. The suggested variation, referred to as “Alternative 15” or the “Flood Control District ROW Alternative” in this Final EIR, is described in more detail in Section 2.5.2(B) and shown in Final EIR Figure 2-2, *Flood Control District ROW Alternative*.

Briefly, as proposed by the Applicant, the new 66 kV subtransmission source line and fiber optic cable route 2 would exit the Etiwanda Substation and extend northeast within SCE’s existing 500 kV transmission ROW until it intersects with the north side of South Highland Avenue. At this point, the route would deviate from the existing ROW in order to cross I-210 perpendicularly. From the point of demarcation from the existing ROW, the proposed 66 kV subtransmission line would continue east, paralleling South Highland Avenue until it intersects San Sevaine Road,



where it would turn north and eventually re-join the existing 500 kV ROW north of the I-210 Freeway. The Applicant-proposed route is shown in the Draft EIR Figure 2-2.

By contrast, the variation suggested by Intex (the “Alternative Route”) would have the 66 kV subtransmission line continue within the existing 500 kV ROW until it reaches a right-of-way owned and maintained by the San Bernardino County Flood Control District (SBFCD) for flood control purposes (the “SBFCD ROW”). From there, the Alternative Route would continue eastward, parallel to and within the SBFCD ROW to the intersection of San Sevaine Road, where it would reconnect with the Applicant-proposed route before crossing I-210 in the perpendicular configuration preferred by Caltrans. In so doing, the Alternative Route would cross the back of the Intex property near the existing flood control channel and freeway rather than along South Highland Avenue in an area that is proposed for business park use as part of the West Gate Specific Plan. The Flood Control District ROW Alternative otherwise would be the same as the Project described in Draft EIR Chapter 2.

The Alternative Route described in Section 2.5.2(B) would result in reduced environmental impacts relative to the Project. Based on discussions with SBFCD and Caltrans, and Intex’s offer to grant SCE an easement for purposes of developing an alternative to the Applicant-proposed route, development of the Flood Control District ROW Alternative also could be feasible. Accordingly, the CPUC has evaluated the potential direct, indirect, and cumulative effects of the Flood Control District ROW Alternative on a resource-by-resource basis and has documented its conclusions below in Section 2.5.2(C). For the reasons summarized in Section 2.5.2(D), CEQA does not require circulation of the Flood Control District ROW Alternative for separate agency and public review.

Description of the Flood Control District ROW Alternative

The Alternative Route would be the same as the Project described in Draft EIR Chapter 2 except, as described in more detail below, it would:

- Be approximately 380 feet shorter than the Applicant-proposed route;
- Require one fewer TSP and one fewer LWS pole compared to the Applicant-proposed route;
- Result in approximately 31,250 square feet less temporary land disturbance and approximately 3,060 square feet less permanent disturbance than the Applicant-proposed route;
- Require the construction and maintenance of approximately 2,000 feet less new access road than the Applicant-proposed route; and
- Necessitate that SCE obtain new easement rights from the SBFCD and Intex.

The Alternative Route would be shorter than the Applicant-proposed route. The total length of the Alternative Route would be approximately 380 feet shorter than the Applicant-proposed route (2,520 feet for the alternative compared to the Project’s approximately 2,900 feet). Under the Flood Control District ROW Alternative, the 66 kV subtransmission line required to serve the

Project would exit the Etiwanda Substation and continue northeastwardly within (and along the western portion of) the Applicant's existing 500 kV transmission line ROW for approximately 660 feet until reaching the point of intersection with the SBFCROW.

Once within the SBFCROW, the Alternative Route would turn to the east and be placed underground within the SBFCROW for approximately 300 feet to maintain clearance with the existing 500 kV transmission line.¹² The Alternative Route then would rise to an overhead position within the SBFCROW and continue east parallel to the flood control channel for approximately 1,560 feet to the intersection of San Sevaine Road. Within the SBFCROW, the Alternative Route would be constructed in the vacant area between an existing access road on the southern side of the flood control channel and the southern boundary of the SBFCROW that is delineated by a chain link fence.

The last approximately 500 feet of the Alternative Route prior to the intersection with San Sevaine Road would be located outside the SBFCROW on property owned by Intex and within the proposed Westgate Specific Plan area.¹³ The Alternative Route would rejoin the Applicant-proposed route approximately 80 feet east of the point where the flood control channel is undergrounded to cross beneath the I-210 Freeway to the north.

The Alternative Route would require two fewer subtransmission line poles than the Applicant-proposed route. The Alternative Route would require one fewer TSP and one fewer LWS pole compared to the Applicant-proposed route, for a total of 13 new poles compared to the Project's approximately 15 new poles in this area. While specific locations of new subtransmission poles are not available for either the Applicant-proposed route or the Alternative Route, the total number and types of poles can be estimated for each based on the distances and alignments. The Applicant-proposed route would require one TSP on the north side of South Highland Avenue where the subtransmission line turns to the east and transitions from an overhead line to an underground line to cross beneath the existing 500 kV transmission line. A second TSP would be located approximately 300 feet east as the line transitions from underground to overhead. The Applicant-proposed route would require another TSP at the intersection of South Highland Avenue and San Sevaine Road where the line turns to the north. A fourth TSP would be constructed just south of the I-210 Freeway in order to span the freeway to the north. Approximately 11 LWS poles would be required for the Applicant-proposed alignment in this area: 9 along South Highland Avenue and 2 along San Sevaine Road. The Alternative Route would require one TSP where the subtransmission line intersects the SBFCROW. This is where the line turns to the east and transitions underground beneath the 500 kV transmission line. A second TSP would be located approximately 300 feet east as the line transitions from underground to overhead. A third TSP would be constructed just south of the I-210 Freeway in

¹² This underground segment would be of a similar length as for the Applicant-proposed alignment, just in a different location.

¹³ The City of Fontana describes the West Gate Specific Plan as a proposed approximately 954-acre master-planned community that would integrate business park, commercial retail, office, and residential uses at the juncture of the Interstate 15/I-210 (City of Fontana, 2012. *West Gate Specific Plan*. Available online: <http://www.fontana.org/index.aspx?NID=1304> (visited May 30, 2012)). As shown in the figure provided with Comment C-2.1, a major portion of the West Gate Specific Plan would be developed north of Baseline Avenue and west of San Sevaine Road and Highland Avenue.

order to span the freeway to the north. Approximately 10 LWS poles would be required for the Alternative Route: 3 along the segment extending northeast from South Highland Avenue and 7 adjacent to the Highland Channel and extending to San Sevaine Road.

The Alternative Route would require less disturbance (temporary and permanent) than the proposed route. The Alternative Route would require approximately 31,250 square feet (0.7 acre) less temporary land disturbance and approximately 3,060 square feet (0.07 acre) less permanent disturbance than the Applicant-proposed route. As described in Draft EIR Section 2.6.3 (p. 2-12), the estimated land disturbance for construction of new poles is 200 feet by 100 feet (20,000 square feet) per TSP and 150 feet by 75 feet (11,250 square feet) per LWS pole. Areas temporarily disturbed during construction would be restored to within 25 feet of a TSP foundation or 10 feet of a LWS pole, resulting in approximately 2,642 square feet or 0.06 acre of permanent disturbance per TSP and 416 square feet or 0.01 acre of permanent disturbance per LWS pole. The permanently disturbed areas would be maintained in a condition cleared of vegetation. During construction of the Alternative Route, it would be necessary to remove temporarily the existing chain link fence demarcating the southern boundary of the SBFCROW for purposes of pole installation and line stringing.

The Alternative Route would require less road construction and maintenance than the Applicant-proposed route. The Alternative Route would require the construction and maintenance of approximately 2,000 feet less of new access road than the Applicant-proposed route. Access to the Alternative Route would occur via existing access roads within SCE's 500 kV transmission ROW and the SBFCROW. The existing SBFCROW access road is located adjacent to the southern side of the flood control channel. Approximately 500 feet of new access road would be required to maintain the portion of the Alternative Route that would be developed between the SBFCROW and San Sevaine Road. The new access road would be substantially similar to other proposed access roads along the subtransmission corridor. The road would have a minimum drivable width of 14 feet with 2 feet of shoulder on each side. The gradient would be leveled so that any sustained grade does not exceed 14 percent. By contrast, the Applicant has proposed to construct approximately 2,500 feet of new access road along South Highland Avenue (Draft EIR Section 2.9.1, p. 2-20).

The Alternative Route would require new easement rights to be obtained. New easement rights would be required to construct the Alternative Route that would not be required for the Applicant-proposed route. That portion of the Alternative Route located within the SBFCROW would require a utility easement from the SBFCROW for a parallel alignment. The SBFCROW also would require submission of plans and a permit application so that a Letter of Non-Objection (LON) could be issued upon determination that a minimum clearance of 35 feet is maintained over SBFCROW for any electrical line and 25 feet for all other types of lines. (County of San Bernardino Department of Public Works, 2012).

New easement rights also would be required to construct, operate, and maintain the Alternative Route to span the approximately 500 feet between the end of the SBFCROW and San Sevaine Road. The property owner of that portion of the route (Intex) has offered to grant SCE a 10-foot

easement to facilitate the construction and operation of an alternative 66 kV subtransmission line alignment. Intex's proposed easement would parallel the SBFCROW from the existing SCE transmission ROW until the terminus of the SBFCROW, where it curves slightly to the north and proceeds along the property boundary to San Sevaine Road.

The Alternative Route differs slightly from the one proposed by Intex in that the Alternative Route avoids bending the 66 kV line between the end of the SBFCROW and San Sevaine Road. By straightening this curve, the Alternative Route not only avoids requiring an additional TSP in this location (which could be required by the Intex proposal to make the turn) but also would be slightly shorter in length. As a result, the Alternative Route would require an adjustment in both the location and width of the proposed Intex easement in order to provide access to the subtransmission line in this area.

B. Analysis of Potential Impacts Created by the Flood Control District ROW Alternative

Aesthetics

As described above, the Flood Control District ROW Alternative would be the same as the Project described in Draft EIR Chapter 2, with the exception of the portion of the Etiwanda Subtransmission Source Line Route in the vicinity of South Highland Avenue and San Sevaine Road. Therefore, impacts from the construction, operation, and maintenance of all other portions of the Alternative would be the same as the Project; adverse visual impacts to scenic vistas would be less than significant or less than significant with mitigation for Baseline, Beech, Cherry, Citrus, Etiwanda, Sierra, and Wilson avenues; Foothill Boulevard; and Interstate 15. The Flood Control District ROW Alternative would not be located in the vicinity of any state-designated or eligible scenic highways in the study area (no impact), would not substantially degrade the existing visual character or quality of the site and its surroundings (less than significant), nor would this Alternative introduce new sources of substantial light or glare that would adversely affect day or nighttime views in the area (less than significant).

Compared to the Project, the Flood Control District ROW Alternative would result in reduced impacts to viewers on South Highland Avenue, a roadway with moderate to high visual sensitivity that provides views of scenic vistas to the north. While the Project would result in significant and unavoidable impacts to viewers on South Highland Avenue, this Alternative would not be located along South Highland Avenue: instead, it would cross South Highland Avenue to extend northeast within the existing 500 kV ROW until it reached SBFCROW. As described above in Section 2.5.2 (A), from there, the Alternative Route would continue eastward, parallel to and within the SBFCROW to the intersection of San Sevaine Road, where it would reconnect with the Applicant-proposed route before crossing I-210. In so doing, the Alternative Route would be located on property near the existing flood control channel and freeway rather than along South Highland Avenue in an area that is proposed for business park use. To viewers on South Highland Avenue the Alternative would appear to the north, against a backdrop of open space and SR 210 in the foreground, and distant mountains in the background. Motorists would

pass under the subtransmission line as it crossed the roadway in existing SCE ROW. The addition of new subtransmission poles and conductor would cause a perceptible increase in structure prominence and industrial character within the landscape. However, motorists already traverse SCE ROW east of the Cherry Avenue, and for the portion of the Alternative that parallels South Highland Avenue, the increased distance between the viewer and the subtransmission line would be enough that project components would not demand attention, and would be co-dominant with other features in the viewshed including existing utility infrastructure and mountains in the background. Visual contrast would be low to moderate. The new features would not block views of the San Bernardino and San Gabriel Mountains in the background to the north, and the overall visual change would be low to moderate. Per Draft EIR Table 4.1-2, given South Highland Avenue's moderate to high visual sensitivity, the resulting visual impact would be adverse but not significant.

Compared to the Project, the Flood Control District ROW Alternative would result in minor increased impacts to viewers on SR 210, a roadway with high visual sensitivity that provides views of scenic vistas to the north; the portion of the Alternative in the SBFCD ROW and in the Intex property would be located closer to SR 210 than the commensurate portion of the Project, by approximately 0.1 mile. However, the Alternative alignment would be located to the south of SR 210, and therefore would not impact scenic views of the San Bernardino and San Gabriel Mountains to the north. This alternative would traverse SR 210 at the same location as the Project. For viewers looking north towards the mountains (i.e., the scenic views), the visual change would be experienced only very briefly, while approaching and crossing under the subtransmission source line. Like the Project, under this Alternative, actual impacts at this KOP would be adverse but less than significant.

Agriculture and Forestry Resources

The Applicant-proposed route would result in the temporary disturbance of approximately 1.6 acres and the permanent conversion of approximately 3.39 acres of *Unique Farmland* to non-agricultural use. The Alternative Route also would be partially located on land that is designated as *Unique Farmland*. However, the amount of temporary disturbance and permanent conversion would be slightly less with the Alternative Route due to the shorter route; reduced access road construction; and placement of part of the subtransmission line within the SBFCD ROW, which is outside the area designated as *Unique Farmland*. Similar to the Project, this farmland conversion previously was analyzed in the City of Fontana General Plan Update EIR, which concluded that the conversion was a significant and unavoidable impact, and so required the adoption of a Statement of Overriding Considerations for the loss of agricultural land. The Alternate Route is not zoned for agricultural use nor is it subject to a Williamson Act contract. It is not located on land zoned as forest land or timberland. Therefore, construction, operation, and maintenance of the Alternative Route would result in the same impact conclusions as the Project (see Draft EIR Section 4.2, *Agriculture and Forestry Resources*) for significance criteria a) through e), but would have a slightly reduced impact related to the conversion of *Unique Farmland*.

Air Quality

The construction of the Alternative Route would not require additional construction equipment beyond that already included in the air quality analysis (see Draft EIR Appendix C); consequently, there would be no new or different criteria air pollutants or toxic air contaminants emitted during the construction of the Alternative Route than already were analyzed in the Draft EIR. Although the Alternative Route would result in slightly lower annual emissions compared to the Applicant-proposed route due to the construction of approximately 380 fewer feet of subtransmission source line and approximately 2,000 fewer feet of new access road, on a daily basis, the construction emissions associated with the Alternative Route would be expected to be the same as those identified in Draft EIR Table 4.3-6 for the Project. Therefore, although the impact conclusions relating to regional air quality associated with NO_x and PM₁₀ would remain the same as the Project (i.e., temporarily significant and unavoidable), implementation of the Alternative Route would cause a slightly reduced impact relative to the Project in this regard.

Implementation of the Alternative Route would increase the distance from the route to the closest sensitive receptors (i.e., the condominium complex at the corner of South Highland Avenue and San Sevaine Road) by approximately 500 feet compared to the Applicant-proposed route. This would result in additional dilution of construction equipment diesel exhaust emissions at the condominium complex. Therefore, the air quality and odor-related impacts on sensitive receptors under the Alternative Route would be slightly reduced compared to the Project, although the impact conclusions would be the same (i.e., less than significant).

Finally, operations associated with the Alternative Route would not result in the release of any air emissions, and any vehicle trips required for periodic maintenance would be indistinguishable from the infrequent trips that would be required for maintenance of the Applicant-proposed route. Therefore, operations and maintenance-related impacts associated with the Alternative Route would be the same as the Project's impacts in these respects (i.e., less than significant).

Biological Resources

The Alternative Route would traverse disturbed habitat that is similar to the comparable portions of the Applicant-proposed route. The Alternative Route is within the ruderal (disturbed) fringe surrounding vineyard lands, and appears to support several small, remnant stands of undisturbed grassland habitat, though no evidence of Riversidean sage scrub, a CDFG sensitive vegetation community, is noted in the alignment. Habitat types in the alignment appear to include ruderal habitat, disturbed annual grassland, vineyard, and disturbed habitat. It is noteworthy that the defunct vineyard located adjacent to the Alternative Route is gradually being recolonized by non-native grasses and native herbaceous species.

CEQA Guidelines biological resource-related significance criterion a) relates to potential impacts to species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS. Portions of the Alternative Route could potentially support special-status plants or wildlife species; however, given the level of disturbance, the overall likelihood is considered low. Focused, USFWS protocol-level biological surveys were performed for the Applicant-proposed route and comparable survey data is not

available for the Alternative Route; therefore, this estimate of potential biological resources that may be encountered on the Alternative Route would require separate surveys to confirm impact conclusions. The route is within the occupied range of the coast horned lizard, coast patch-nosed snake, burrowing owl, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, American badger, and Los Angeles pocket mouse. Thus, these species would be presumed present similar to the comparable portion of the Applicant-proposed route. Therefore, Mitigation Measure 4.4-2 identified for the Applicant-proposed route also would be required for Alternative 15. In the absence of focused surveys of the Alternative Route to demonstrate absence of burrowing owl (a California species of special concern) and San Bernardino kangaroo rat (federally listed endangered), it is possible that these species could occur within the alignment. The Applicant-proposed route is not within designated critical habitat for San Bernardino kangaroo rat, which occurs north of I-210. Plummer's mariposa lily and Parry's spineflower were identified in portions of the Alternative Route (though not near the modified alignment) and in the absence of focused surveys, there is a low likelihood that these or other special-status plant species may occur in the Alternative Route.

Because protocol-level surveys demonstrated the absence of San Bernardino kangaroo rat in the Applicant-proposed route, additional kangaroo rat surveys were not required to mitigate project impacts. Additional surveys would be required for the Alternative Route to identify the potential presence or absence of San Bernardino kangaroo rat and special-status plants in the alignment (see Mitigation Measure Alternative 15-BIO-1 and BIO-2, respectively, below). If the San Bernardino kangaroo rat were identified during surveys, additional protective measures would be required, such as avoiding occupied habitat by siting towers to avoid occupied habitat or using an alternate route such as the Applicant-proposed route. Due to the high degree of ground disturbance of habitat within the Alternative Route and surrounding intensive land uses (I-210 to the north and vineyards to the south), the likelihood of encountering San Bernardino kangaroo rat and/or special-status plants in the alignment is considered low.

Similar to the Applicant-proposed route, the Alternative Route would have comparable potential impacts to common or protected nesting migratory birds, and similar hazards to raptors as a result of electrocution or collision. Therefore, APMs identified for the Applicant-proposed route, and Mitigation Measure 4.4-4 identified for the Applicant-proposed route would also be required for the Alternative Route.

Mitigation Measure Alternative 15-BIO-1: A habitat assessment for San Bernardino kangaroo rat shall be conducted by a qualified biologist within the Flood Control District ROW Alternative if this route is approved. If no potential occupied habitat is found during this assessment, then no further action would be necessary. If potential or occupied habitat is identified, USFWS protocol-level trapping surveys shall be performed. Based on survey findings, two potential outcomes are possible:

- If San Bernardino kangaroo rats are not identified during trapping, no impact would occur and no further action would be required.
- If San Bernardino kangaroo rats are detected during surveys, an alternate alignment could be selected or the route altered to completely avoid all potential or occupied

habitat for this species. If complete avoidance is not feasible, minimization measures shall be implemented to reduce potential project impacts within occupied habitat to the maximum extent feasible. Such measures could include minimizing that portion of the project footprint that could encroach on an occupied habitat area, surveying and establishing exclusionary perimeter fencing around such areas, and staging materials and work so as not to encroach into them. The presence of a Biological Monitor during Project construction shall be required to further ensure that any potential impacts to special-status wildlife species are avoided and minimized. For those impacts that cannot feasibly be avoided or further minimized, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.

Significance after Mitigation: Less than Significant.

Mitigation Measure Alternative 15-BIO-2: If the Flood Control District ROW Alternative is selected, portions of the proposed alignment that have not been surveyed to determine the potential presence or absence of special-status plants shall be surveyed following the most recent CDFG rare plant survey protocol (CDFG, 2009). Following surveys, two potential outcomes are possible:

- If special-status plants are not identified during focused surveys, impacts would not be anticipated and no further action would be required.
- If special-status plants are identified during surveys, the implementation of Mitigation Measure 4.4-1 would reduce potential impacts to a less-than-significant level.

CEQA Guidelines biological resource-related significance criteria b) and c) relate to potential impacts to riparian habitat, sensitive natural communities, or federally protected wetlands. The Alternative Route would not impact wetlands, riparian habitat or other sensitive natural community, as they do not occur in the alignment.

CEQA Guidelines biological resource-related significance criterion d) relates to movement of any native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or use of native wildlife nursery sites. The Alternative Route would not interfere with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No such sites occur in the local vicinity of the Alternative Route, which abuts a freeway and degraded agricultural lands.

CEQA Guidelines biological resource-related significance criterion e) relates to whether a proposed project or alternative would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The Alternative Route would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Following the implementation of protective measures, the construction, operation, and maintenance of the Alternative Route is expected to result in the same impact conclusions as the Project (see Draft EIR Section 4.4, *Biological Resources*) for significance criteria a) through e). The Alternative Route traverses disturbed habitat similar to that which occurs on the proposed route and the likelihood of encountering sensitive resources in this alignment, which has not been fully studied for biological resources, is estimated to be low.

Cultural Resources

The Alternative Route would result in the construction of approximately 380 fewer feet of subtransmission line and approximately 2,000 fewer feet of new access road, but overall it would not substantially change the size, location or type of facilities to be constructed. Therefore, the facts, analysis and significance conclusions presented for the Applicant-proposed route generally hold true for the Alternative Route, with one exception. Focused cultural resources surveys were performed for the Applicant-proposed route, but comparable survey data is not available for all of the Alternative Route. Because the Alternative Route, where it diverges from the Applicant-proposed route, has not been subject to cultural resources survey, the presence or absence of cultural resources within this portion of the Alternative Route is unknown, and therefore it is possible that there are previously undocumented cultural resources within these unsurveyed areas. However, because Mitigation Measure Alternative 1-CUL-1 would require additional archaeological survey of unsurveyed areas, the potential cultural resource-related impact of the Alternative Route would be the same as the Project (i.e., less than significant impact with mitigation incorporated).

With respect to paleontological resources, the Alternative Route would result in similar impacts to paleontological resources as the Project because the two alignments are underlain by the same geologic units.

Potential impacts to cultural resources under this alternative would be similar to the Applicant-proposed route. Mitigation Measures 4.5-1, 4.5-2, 4.5-3, and Alternative 1-CUL-1 also would be required for the Alternative 15. The significance conclusions in Draft EIR Section 4.5, *Cultural Resources*, with regard to significance criteria a) through d) would be the same for Alternative 15 as for the Project.

Energy Conservation

Construction of the Alternative Route would result in incrementally less energy consumption for construction equipment and construction-related transportation compared to the Applicant-proposed route because of the shorter route resulting in less land disturbance, fewer subtransmission line poles, and reduced access road construction. As with the Project, the Alternative Route would not interrupt existing local SCE service and construction-related energy demands are not expected to have a significant adverse effect on energy resources. Like the Project, the Alternative Route would contribute to meeting projected local peak demand electricity needs and would have no impact on local or regional energy supplies or capacity, nor would it impact electricity generation facilities' ability to provide and maintain existing levels of service during peak and base period demands. Therefore, the impact conclusions related to the

construction, operation, and maintenance of the Alternative Route would be the same as for the Project in Draft EIR Section 4.6, *Energy Conservation*, with regard to criteria a) through f).

Geology, Soils, and Seismicity

The Alternative Route would not substantially change the size or type of facilities to be constructed. The Alternative Route would be slightly shorter, require less access road construction and maintenance, and result in less overall land disturbance. Because the Alternative Route, like the Applicant-proposed route, would cross mostly flat terrain underlain by similar earth materials, it would result in similar potential impacts with respect to seismic ground shaking and/or seismic-related ground failure, soil erosion, unstable geologic units or soils, and expansive soils. While SCE has not yet prepared a geotechnical investigation of the subtransmission source line route, associated facilities, or telecommunications system, one would be prepared if necessary as part of pre-construction activities. Likewise, review of all geotechnical reports and their incorporation into Project plans would occur prior to issuance of a grading or building permit by the agency with jurisdiction over the construction activity. Design recommendations from existing geotechnical reports also would be relevant and applied to the design of the Alternative Route. For example, for underground sections of the subtransmission source line (e.g., the 300 foot section of the Alternative Route that would be underground), the trench would be backfilled with a slurry mix that is non-expansive. Therefore, the significance conclusions with respect to each of the criteria in Draft EIR Section 4.7, *Geology, Soils, and Seismicity*, would be the same for the Alternative Route as they are for the Project.

Greenhouse Gas Emissions

Implementation of the Alternative Route would result in slightly lower construction emissions compared to the Applicant-proposed route due to the construction of approximately 380 fewer feet of subtransmission line and approximately 2,000 fewer feet of new access road. As identified in Draft EIR Section 4.8, *Greenhouse Gas Emissions*, estimated total emissions of GHGs that would be generated during construction of the Project is 1,404 metric tons CO₂e. When compared to the subtransmission source line and roadwork emissions estimated for the Project (see Draft EIR Appendix C), which includes approximately 12 miles of subtransmission source line and 7 miles of new access road, it is estimated that construction of the Alternative Route would result in approximately 10 fewer metric tons of CO₂e compared to the Project. Amortized over a 30-year project lifetime, the difference between the Project and the Alternative Route would be approximately 0.3 metric tons per year. In addition, GHG emissions generated during operation and maintenance of the Alternative Route would be the same as those described for the Project. Therefore, the Alternative Route would cause incrementally (but inconsequentially) fewer GHG emissions than the Project and the significance conclusions reached in Draft EIR Section 4.8, *Greenhouse Gas Emissions*, for the Project would be the same for the Alternative Route.

Hazards and Hazardous Materials

The Flood Control District ROW Alternative is within the regulatory agency database search area reviewed for identification of hazardous materials sites in the vicinity of the Project. No hazardous materials sites are identified in this area; therefore, the impact determinations related to

location on a hazardous materials site and the potential to encounter hazardous materials in soil or groundwater during Project construction would be the same for the Alternative Route as they would be for the Project. Further, the location of the Alternative Route would not change the impact determinations related to hazards in proximity to schools or airports, wildland fires, and potential to interfere with an adopted emergency response or evacuation plan. Although the total length of the Alternative Route would be shorter and fewer roads would need to be constructed, the Alternative Route would not substantially lessen the kinds and amounts of hazardous materials associated with Project construction or operation and, as such, impact conclusions for the Alternative Route would be the same as the Project pertaining to the routine transport, use or disposal of hazardous materials or hazards to the public or the environment through reasonably foreseeable upset and accident conditions. In summary, the Flood Control District ROW Alternative would not change the impact conclusions in Section 4.9, *Hazards and Hazardous Materials*, related to significance criteria a) through h).

Hydrology and Water Quality

The Alternative Route would not substantially change the size or type of facilities to be constructed. The Alternative Route would be slightly shorter, require less access road construction and maintenance, and result in less overall land disturbance. Because the Alternative Route, like the Applicant-proposed route, would cross mostly flat terrain, and differ from the Applicant-proposed route only over a relatively short section, it would result in similar potential impacts with respect to existing water quality standards and the potential for increasing erosion and/or flooding. Similar to the Applicant-proposed route, the construction, operation, and maintenance of the Alternative Route would generally pose a low threat to water quality due to the level terrain, high rate of soil infiltration, and the regulatory controls that would apply. The mitigation measures that would be required to avoid or reduce the significance of Project impacts also would be required for Alternative 15 (e.g., preparation and implementation of a SWPPP, a WQMP, and, if required, coverage under a water quality certification, and/or WDR). These mitigation measures would be sufficient to reduce potential water quality impacts to a less-than-significant level. Therefore, there would be no change to the conclusions in Draft EIR Section 4.10, *Hydrology and Water Quality*, with regard to hydrology and water quality.

Land Use and Planning

The Alternative Route would be located within the Project Area analyzed in the Draft EIR; it would not change the land uses proposed by the Project; physically divide a community; be located within a land use or zoning designation not analyzed in Draft EIR Section 4.11; or conflict with any with applicable land use plans, policies, or regulations. Although the Alternative Route would be located on land within the as-yet undeveloped West Gate Specific Plan area, this alternative would relocate the subtransmission line and access road from South Highland Avenue to the back of the property along the SBFCO ROW, thereby reducing any potential access restrictions that could occur once this area is developed. New easement rights and submittal of plans and a permit application to the SBFCO would be required to construct the Alternative Route for the segment located within the SBFCO ROW. The Alternative Route also would require an adjustment in both the location and width of the proposed Intex easement in order to

provide access to the subtransmission line between San Sevaine Road and the SBFCD ROW. The Flood Control District ROW Alternative would result in the same impact conclusions as the Project with respect to the significance criteria considered in Draft EIR Section 4.11, *Land Use and Planning*.

Mineral Resources

The Alternative Route would not substantially change the size or type of facilities to be constructed. While portions of the Project area do intersect some aggregate resource sectors, the Alternative Route alignment would not be within an area currently available for extraction of mineral resources. It would be along streets and a portion of a flood control channel, bounded on either side by existing land uses. Therefore, the impact significance conclusions would be the same for the Flood Control District ROW Alternative as they are for the Project in Draft EIR Section 4.12, *Mineral Resources*.

Noise

Implementation of the Alternative Route would increase the distance from the route to the closest sensitive receptors (i.e., the condominium complex at the corner of South Highland Avenue and San Sevaine Road) by approximately 500 feet compared to the Applicant-proposed route. This would result in additional attenuation of construction equipment and corona discharge noise levels at the condominium complex. Therefore, although the significance conclusion regarding noise and vibration impacts on those sensitive receptors would be the same as for the Project (i.e., less than significant) the Alternative Route would cause incrementally less noise than the Project. Mitigation Measure 4.13-5 would apply to Alternative 15 just as it would to the Project in the event that nighttime construction activities would occur near San Sevaine Road south of I-210 because that area would continue to within 1,000 feet of the condominium complex.

The segment of the Etiwanda Subtransmission Source Line Route that would be within the City of Rancho Cucamonga is shared by the Alternative Route and the Applicant-proposed route; therefore, the Draft EIR significant and unavoidable Impact 4.13-1 conclusion associated with construction activities violating City of Rancho Cucamonga exterior noise standards would be the same. Similarly, the Alder Subtransmission Source Line Route would be implemented under both the Alternative Route and the Applicant-proposed route; therefore, Impact 4.13-6 associated with Rialto Municipal Airport noise would be the same.

In summary, the construction, operation, and maintenance of the Alternative Route would have an incrementally less significant impact than the Project; however, since the reductions would be so slight, the impact conclusions would be the same for the Alternative Route as those reached for the Project in Draft EIR Section 4.13, *Noise*.

Population and Housing

Although the construction-related effects of the Alternative Route would be less than the Applicant-proposed route due to the shorter subtransmission line length, the overall number of workers required for construction of the entire Project is not expected to change. The Alternative Route would not propose new homes or businesses nor displace any housing or people. Operation

of the Alternative Route would not indirectly induce substantial population growth or encourage new development as the Project is designed to meet forecasted demand projections for electrical service. Therefore, construction, operation, and maintenance of the Alternative Route would have the same population and housing-related effects as the Project (see Draft EIR Section 4.14, *Population and Housing*).

Public Services

Construction of the Alternative Route would not change the number of workers required for Project construction discussed in the Draft EIR, nor would it cause an increased demand or need for fire protection, police protection, school facilities, parks, or other public facilities. Therefore, it would not result in the construction of new or expanded existing government facilities for public services. Consequently, the impacts of the Flood Control District ROW Alternative would be the same as the conclusions reached for the Project in Draft EIR Section 4.15, *Public Services*.

Recreation

The Alternative Route does not propose any recreational facilities, nor would it change the number of workers required for Project construction described in the Draft EIR. Therefore, it would not cause physical deterioration of existing facilities, or indirectly require construction or expansion of recreational facilities. Therefore, implementation of the Flood Control District ROW Alternative would cause the same impacts and result in the same impact significance conclusions as were reached for the Project in Draft EIR Section 4.16, *Recreation*.

Transportation and Traffic

The Alternative Route would alter and shorten the Applicant-proposed route by approximately 380 feet and would require the construction and maintenance of approximately 2,000 feet less of new access road than the Applicant-proposed route. The Alternative Route would not substantially change the size or type of facilities to be constructed and would not require a workforce or equipment above and beyond what is described in the Draft EIR Chapter 2, *Project Description*, and analyzed in Section 4.17, *Transportation and Traffic*. Because the Alternative Route would generate either similar or slightly lower levels of construction traffic along the similar roadways as the Applicant-proposed route, potential impacts to transportation and traffic under this alternative would be substantially similar to the Applicant-proposed route. Therefore, Mitigation Measures 4.17-1 and 4.17-2 identified for the Applicant-proposed route also would be required for Alternative 15. In addition, traffic related to operation and maintenance of Alternative 15 would be the same as for the Applicant-proposed route because the same number of staff and maintenance activities would be required, so impacts would be the same. Therefore, the impact significance conclusions for Alternative 15 would be the same as those reached for the Project in Draft EIR Section 4.17, *Transportation and Traffic*.

Utilities and Service Systems

The Alternative Route would result in incrementally less water consumption and wastewater and solid waste generation due to the slightly reduced subtransmission source line route length and corresponding reduced construction effects. However, the decrease would not substantially

change wastewater treatment needs, wastewater treatment facility capacity, water supply needs, or solid waste disposal needs relative to the Project. Consequently, the impact significance conclusions would be the same as those reached for the Flood Control District ROW Alternative in Draft EIR Section 4.18, *Utilities and Service Systems*.

C. The Flood Control District ROW Alternative is Environmentally Superior to the Project

As summarized in Draft EIR Section ES.7 (p. ES-9) and analyzed throughout Draft EIR Chapter 4 (p. 4-1 et seq.), the proposed Project would cause no adverse impact related to Agriculture and Forest Resources and Public Services and a less-than-significant impact to the following resources: Energy Conservation, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, and Utilities and Service Systems. With the implementation of identified mitigation measures, the Project also would cause a less-than-significant impact to: Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Recreation, and Transportation and Traffic. By contrast, it was determined that development of the Project would cause significant and unavoidable impacts to three resource areas: Aesthetics, Air Quality, and Noise.

As analyzed in Section 2.5.2(C), the Flood Control District ROW Alternative generally would result in the same impact conclusions as the Project with one exception: The Project's significant and unavoidable Aesthetics impact relative to South Highland Avenue would be reduced to a less than significant level. The Flood Control District ROW Alternative would result in a less than significant (rather than significant unavoidable) impact to viewers on South Highland Avenue, which provides views of scenic vistas to the north, because it would remove the subtransmission line route from South Highland Avenue and, instead, would locate it slightly further north, and thereby would increase the distance between viewers and the subtransmission line. The Alternative Route would not block views of the San Bernardino and San Gabriel Mountains in the background to the north. In addition, the Flood Control District ROW Alternative would cause incrementally reduced impacts to noise and air quality relative to the Project because the Alternative Route would be located farther away from sensitive receptors than the Project. For these reasons, the Flood Control District ROW Alternative is environmentally superior to the Project.

D. The Flood Control District ROW Alternative Does Not Require Circulation for Agency and Public Review under CEQA Guidelines Section 15088.5.

CEQA requires a lead agency to circulate new information added to an EIR after the Draft EIR has been issued for review but before certification only when the new information is "significant" (Pub. Res. Code §21092.1; 14 Cal. Code Regs. §15088.5). See, for example, *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 547, where the court determined that the inclusion of a new alternative, indeed any new material in a final EIR, "is not fatal, since the final version must respond to comments on the draft EIR, with the result that the final EIR will almost always contain information not included in the draft EIR. What matters is whether significant new information is added after the public comment period closes." While the Flood Control District ROW Alternative is new information, it is not "significant new information" for purposes of CEQA.

The California Supreme Court clarified in *Laurel Heights Improvement Association v. Regents of University of California* (1993) 6 Cal.4th 1112 (Laurel Heights II) that new information added to an EIR after the Draft EIR has been issued but before certification has occurred is not “significant” unless the EIR is changed in a way that “deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” Examples of “significant new information” include: (i) A new significant environmental impact; (ii) a substantial increase in the severity of an environmental impact the significance of which cannot be reduced below established thresholds (i.e., to a less-than-significant level); and (iii) a feasible project alternative considerably different from ones analyzed in the Draft EIR would clearly lessen the proposed project’s significant environmental impacts, but the project proponent refuses to adopt it (*Laurel Heights II*, 6 Cal.4th at pp. 1129–1130; 14 Cal. Code Regs. §15088.5(a)).

As analyzed in Section 2.5.2(C), none of the information added to the EIR in Section 2.5.2(B) discloses “a new substantial environmental impact,” or a “substantial increase in the severity” of an impact of the Project. In fact, overall, the new alternative substantially reduces the Aesthetic impact of the Project relative to South Highland Avenue (resulting in a less than significant, rather than the Project’s significant and unavoidable, impact to views in this area) and incrementally reduces impacts in several other resource areas even if the ultimate conclusions remain the same: Because the Flood Control District ROW Alternative would be shorter than the Applicant-proposed route, constructed farther from sensitive receptors, require fewer poles, less temporary and less permanent disturbance, and less road construction and maintenance work, fewer or incrementally less severe environmental impacts would result. Accordingly, CEQA does not require the Lead Agency to circulate this new alternative for comment before certifying the Final EIR.

Based on communications with San Bernardino County, which has jurisdiction over the flood control channel ROW, and with Caltrans, which would oversee the crossing of I-210 just as it would under the Project, it appears that the Flood Control District ROW Alternative would be feasible (see County of San Bernardino Department of Public Works, 2012¹⁴; and Caltrans, 2012¹⁵). Further, as described in Section 2.5.2(B) and shown in Figure 2-2 *Flood Control District ROW Alternative*, the new alternative is not considerably different from the alternatives analyzed in the Draft EIR. To the contrary, the Alternative Route would be the same as the Project except that it would be approximately 380 feet shorter than the Applicant-proposed route; would require one fewer TSP and one fewer LWS pole; would result in approximately 31,250 square feet less temporary land disturbance and approximately 3,060 square feet less permanent disturbance; would require the construction and maintenance of approximately 2,000 feet less new access road; and would require SCE to obtain new easement rights from the SBFCD and Intex. The difference between the alternative route and the Project is only 1.7 percent when measured in

¹⁴ San Bernardino County, 2012. Marty Mish, Flood Control Permit Coordinator, Department of Public Works, email communication with Cory Barringhaus, Environmental Science Associates. May 8, 2012.

¹⁵ California Department of Transportation (Caltrans), 2012. Daniel Kopulsky and Harish Rastogi, P.E., email communication with Cory Barringhaus, Environmental Science Associates. April 25 and May 9, 2012.

terms of the permanent disturbance that each would cause. Stated differently, the alternative alignment (by itself) would affect less than 5 percent of the total proposed length of new subtransmission source line (a total length of 12 miles is proposed). These minor modifications to the Project do not make the new alternative “considerably different” for purposes of CEQA Guidelines section 15088.5.

In the present situation, not circulating the new alternative and the analysis of its potential environmental effects does not deprive the public of a meaningful opportunity to comment on the analysis and conclusions. As shown in *Neighbors for Smart Rail v. Exposition Metro Line Const. Authority* (2012) 205 Cal.App.4th 552, this is not the standard for recirculation of an EIR. Instead, “the question is whether the new information disclosed a substantial adverse effect (or increase in severity), in which case the public should have an opportunity to comment” (Id.). The new alternative was identified in a public comment on the Draft EIR and was analyzed in response to the community’s environmental concerns. The analysis supports a conclusion that development of the new alternative would be substantially better with respect to views related to South Highland Avenue relative to the Project, and incrementally better for other resources as well. Under these circumstances, circulation of the new information is not required.

2.5.3 MR3: Underground vs. Overhead Lines

Commenters and Comments Addressed by MR3

Commenter	Comments Addressed by MR2
City of Fontana	B-5.3, B-5.6
City of Rialto	B-6.2
Lewis Operating Corporation	C-1.3, C-1.6
Hall & Foreman, Inc., John Hogan, CEO/Principal	C-2.1
J. W. Mitchell Company, LLC (Gresham Savage)	C-3.15, C-3.18, C-3.25
Hall & Foreman, Inc., John Hogan, CEO/Principal	D-2.1
Greg Lanz, City of Rialto	D-3.2
Charles Fahie, City of Fontana	D-4.3

Summary of Issues Raised

- A. Allowing new overhead lines would be incompatibility with local jurisdictions’ development standards;
- B. New lines should be placed underground along view corridors, including South Highland Avenue;
- C. New lines should be placed underground at other specific locations; and
- D. The range of alternatives analyzed in the Draft EIR should have included an undergrounding component.

Response

A. Incompatibility with local jurisdictions' development standards does not rise to the level of a significant effect under CEQA because such standards are preempted by CPUC General Order-131-D.

As discussed on Draft EIR pages 4.1-12 and 4.11-2, the CPUC has exclusive jurisdiction under CPUC General Order No. 131-D over Project siting and design. Because the Project is regulated by this General Order, it is generally exempt from local land use and zoning regulations and discretionary permitting. The permitting and regulation of transmission lines is a matter of statewide concern. Therefore, the Project is not subject to local regulations regarding the undergrounding of the proposed subtransmission line.

B. Undergrounding has not been required along view corridors, including South Highland Avenue, for a variety of environmental reasons.

The Draft EIR acknowledges on page 4.1-10 under “Scenic Vistas” that the cities of Fontana, Rialto, and Rancho Cucamonga generally define major north-south arterial roads as view corridors, reflecting the importance and value of northerly views of the mountains. The Draft EIR considers scenic vistas in the study area as including those scenic view corridors discussed under “Motorists on Major or Scenic Travel Routes” on page 4.1-9.

Simulations for four of the identified scenic corridors, including two north-south routes (Sierra Avenue and Citrus Avenue), and two east-west routes (Baseline Avenue and Highland Avenues) are provided in the Draft EIR. Views depicted in the simulations for these scenic corridors are representative of views from other scenic corridors. For example, visual changes to scenic views from the Beech Avenue and Cherry Avenue scenic corridors would be similar to those shown for Citrus Avenue (Draft EIR Figure 4.1-5, p. 4.1-19), and the visual change to viewers on Foothill Boulevard and Wilson Avenue would be similar to those shown for Baseline Avenue (Draft EIR Figure 4.1-6, p. 4.1-20).

The methodology used to evaluate impacts to visual resources is described on Draft EIR pages 4.1-14 through 4.1-16. Definitions related to visual resources, including metrics used to define overall visual sensitivity of the Project area, are provided on pages 4.1-1 and 4.1-2. The determination of impact significance is based on the combined factors of overall visual sensitivity and the degree of overall visual change.

Impacts to scenic vistas, which include the key view corridors described above, are discussed under Impact 4.1-1 beginning on Draft EIR page 4.1-25. Upon implementation of Mitigation Measure 4.1-1 to reduce the impact of glare, the Draft EIR considered: 1) the numerous individual factors that influence visual contrast, 2) their contribution to the overall visual change created by construction of the Project, and 3) the visual sensitivity of the viewsheds. Weighing these factors, the Draft EIR then concluded that impacts to scenic vistas and scenic roadways would be less than significant, with the exception of that portion of the subtransmission line proposed near the intersection of South Highland Avenue and San Sevaine Road.

As discussed on Draft EIR page 3-1, CEQA requires analysis of a reasonable range of alternatives to a proposed project that could feasibly attain most of the project objectives while substantially reducing or eliminating any significant effects. Two alternatives, Alternative 8 (Parallel to 500 kV Transmission Line [Overhead]) and Alternative 9 (Parallel to 500 kV Transmission Line [Underground]), were considered in order to reduce the significant visual impact near South Highland Avenue and San Sevaine Road. Alternative 8 was eliminated from detailed consideration because the diagonal angle at which the subtransmission line would traverse I-210 would be infeasible from a regulatory perspective as Caltrans requires utility lines to cross at a right angle to a highway. Alternative 9 was found to be technically infeasible due to the existing infrastructure in the location of the existing ROW spanning I-210. Although the impact in the vicinity of South Highland Avenue and San Sevaine Road was determined to be significant and unavoidable in the Draft EIR, comments received on the Draft EIR identified a variation of the alignment for the subtransmission line in this area that would reduce the aesthetic impact to a less-than-significant level. See MR2 for discussion of this alternative to the Project.

Although there may be aesthetic benefits to placing a subtransmission line underground, the installation underground of all or portions of the subtransmission 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 days required to complete the trenching work would not be required for the proposed overhead construction, would result in greater impacts related to air quality, erosion, biological resources, and noise, and could result in greater impacts to cultural resources and traffic 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 not required at all or required in lesser amounts than for overhead installations: concrete, steel, precast reinforced concrete structures and pull ropes, conduits, fittings and risers, handholes and pull boxes, manholes and vaults (poured and precast), semi-buried structures, frames, covers, and accessories (SCE, 2012).¹⁶

Undergrounding also would result in the need for large transition structures to conduct the 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 impacts related to air quality, erosion, biological resources, and noise; and could result in greater impacts to traffic compared to the proposed construction of overhead lines. Even if repair and maintenance of a subsurface line

¹⁶ 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).

could be accomplished without surface disturbance, i.e., by manipulating the line via underground access points, working in vaults or other accessways would require lighting and attention to 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 before power is restored after an interruption.¹⁷

C. Other new segments of the lines proposed by the Project are not required to be placed underground.

Potential visual impacts regarding the Project's subtransmission source line routes are discussed in Draft EIR Section 4.1, *Aesthetics*. The methodology used to evaluate impacts to visual resources is described on pages 4.1-14 through 4.1-16. Definitions relating to the analysis of visual resources, including metrics used to define overall visual sensitivity of the Project area, are provided on Draft EIR pages 4.1-1 and 4.1-2. The determination of impact significance is based on the combined factors of overall visual sensitivity and the degree of overall visual change.

Analysis documented in Draft EIR Section 4.1.4 (p. 4.1-25 et seq.) determined that the Project and alternatives would cause a less-than-significant impact with the implementation of Mitigation Measure 4.1-1 on all scenic vistas but one: South Highland Avenue at San Sevaine Road, looking west, where it was determined that the proposed subtransmission line would cause significant and unavoidable aesthetic effects. As discussed and analyzed in MR2, Intex proposed a variation of the alignment for the proposed 66 kV subtransmission line in the vicinity of South Highland Avenue and San Sevaine Road that, if approved, would cause a less than significant impact relative to all scenic vistas, including the one at South Highland Avenue at San Sevaine Road. See also MR3(B), which provides additional reasons why undergrounding at this location is not recommended.

The analysis of aesthetic impacts documented in Draft EIR Section 4.1 also does not support a recommendation that any of the other subtransmission line segments in the Project area be installed underground. The analysis of potential impacts of the Project and alternatives determined that the visual impact of portions of the subtransmission lines would be perceived as negative and adverse primarily because the existing, baseline aesthetic conditions in that area are degraded (see, e.g., Setting Photos A through H, pp. 4.1-4 and 4.1-5). Further, based on the balancing of significance considerations *with the ameliorating effects of Mitigation Measure 4.1-1*, the Project and alternatives would result in less-than-significant impacts with respect to the remaining key observation points. Under these circumstances, CEQA does not provide a basis for the lead agency to impose undergrounding (or indeed any other) mitigation measure to further reduce potential effects. Consequently, the proposed new subtransmission lines are recommended to be placed above ground.

¹⁷ Other, non-environmental factors also affect whether to install power lines underground. For example, as a state-regulated utility, the Applicant 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 (see, e.g., SCE, 2008. Frequently Asked Questions Presidential 66/16 Kilovolt Substation Project (Oct. 2008)).

D. Lack of undergrounding alternatives.

As discussed on page 3-1 of the Draft EIR, CEQA requires analysis of alternatives to a proposed project that could feasibly attain most of the basic project objectives while substantially reducing or eliminating any significant effects. CEQA does not require that an EIR consider every conceivable alternative to a project, but rather that it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation (CEQA Guidelines §15126.6(a)).

Several alternatives were considered in the Draft EIR that featured more undergrounding of the subtransmission line than was proposed by the Applicant. Specifically, Alternative 5 (Draft EIR, p. 3-7) and Alternative 7 (Draft EIR, p. 3-8) were considered to reduce visual impacts along Casa Grande Drive, and Alternative 9 (Draft EIR, p. 3-8) was considered to reduce visual impacts in the vicinity of South Highland Avenue and San Sevaine Road. Alternative 5 would underground the segment of the Alder Subtransmission Source Line Route along Casa Grande Drive between Locust Avenue and North Alder Avenue. This alternative would reduce potential visual impacts, but would result in an increase in construction NOx emissions and locate construction activities closer to residential and other receptors. Alternative 7 was developed to reduce aesthetic impacts along the Alder Subtransmission Source Line Route, but was found to have higher construction-related air quality emissions than both the Project and Alternative 1. While the potential aesthetic impacts along the proposed Alder Subtransmission Source Line Route were found to be less than significant, the air quality impacts were found to be significant and unavoidable. This alternative was eliminated from further evaluation because it although it would reduce an already less-than-significant aesthetic impact, it would substantially worsen an already significant and unavoidable impact with respect to air quality. Alternative 9 was developed to avoid the significant unavoidable aesthetic impacts associated with a portion of the Etiwanda Subtransmission Source Line Route in the vicinity of South Highland Avenue and San Sevaine Road. As discussed in MR3(B), this alternative was found to be technically infeasible due to the existing infrastructure in the location of the existing ROW spanning I-210. Although the impact in the vicinity of South Highland Avenue and San Sevaine Road was determined to be significant and unavoidable in the Draft EIR, comments received on the Draft EIR identified a variation of the alignment for the subtransmission line in this area that would reduce the impact to less-than-significant (see MR2). Accordingly, for the reasons provided in Draft EIR Table 3-2 (p. 3-6 et seq.) and Section 3.5 (p. 3-12 et seq.), none of these three potential alternatives was carried forward for more detailed analysis in the EIR.

As explained in MR3(B), undergrounding all or additional portions of the proposed subtransmission lines would result in greater environmental impacts compared to overhead construction during construction, operation, and maintenance of the Project. For this reason, additional potential alternatives that would require more of the proposed subtransmission line to be installed underground are not considered.

2.5.4 MR4: Additional Staging Area Locations

Summary of Issues Raised

- A. Following publication of the Draft EIR, the Applicant identified two additional potential temporary staging areas that could be used to support Project-related construction activities.¹⁸ Where are they in relation to other Project components?
- B. What environmental effects could result from the preparation, temporary use, and restoration of these areas?

Response

A. Description and Location of the Two New Potential Staging Areas

The Applicant initially identified six potential temporary staging areas, which are described in Draft EIR Section 2.9.2 (p. 2-22 et seq.) and shown in Draft EIR Figure 2-2 (p. 2-23). As described in Draft EIR Section 2.9.2 (p. 2-22), the preparation of these areas for the proposed use “would include the application of road base or crushed rock, depending on existing ground conditions, and installation of perimeter fencing.” These areas would be “restored to preconstruction conditions or the landowner’s requirements following completion of construction for the Project” (Id.).

To supplement the six potential locations initially identified, the Applicant proposed two additional potential temporary staging area locations after the Draft EIR had been issued: Potential Staging Area No. 7 and Potential Staging Area No. 8. The Applicant subsequently withdrew its request to include Staging Area No. 7 in the Project.¹⁹ Potential Staging Area No. 8 would be located on approximately 8 acres situated northeast of Etiwanda Avenue at Napa Street in Rancho Cucamonga. Figure 2-6, *Potential Staging Area Locations* (see Appendix G), has been revised to show Potential Staging Area No. 8, and the first paragraph on Draft EIR page 2-22 and Table 2-2 are revised as follows:

Construction staging for the Project would require temporary staging areas. The following locations are expected to be used as staging areas for the Project: south of Foothill Boulevard at Pepper Avenue, Rialto; the Etiwanda Substation; the Falcon Ridge Substation; northwest corner of Etiwanda Avenue at Foothill Boulevard; northeast corner of South Highland Avenue at San Sevaine Road; ~~and the Foothill Service Center; and the northeast corner of Etiwanda Avenue at Napa Street~~ (see **Figure 2-6, Potential Staging Area Locations**). The potential staging area locations offer from 0.5 to 8 ~~up to 5~~ acres of space.

The preparation, use, and restoration of Potential Staging Area No. 8 would be identical to the staging areas described and analyzed in Section 2.9.2 of the Draft EIR.

¹⁸ SCE provided details about Potential Staging Area Nos. 7 and 8 in its June 27, 2012, response to Data Request No. 6.

¹⁹ SCE Response to Data Request No. 7, August 30, 2012.

**TABLE 2-2
POTENTIAL STAGING AREA LOCATIONS**

Name	Location	Condition	Approximate Area	Project Component
No. 1	South of Foothill Boulevard at Pepper Avenue, Rialto	Previously Disturbed	0.5 acre	Subtransmission
No. 2	Etiwanda Substation, Rancho Cucamonga	Previously Disturbed	3 acres	Subtransmission/ Telecommunications
No. 3	Proposed Falcon Ridge Substation, Fontana	Undisturbed	2 acres	Substation
No. 4	Northwest corner of Etiwanda Avenue at Foothill Boulevard, Rancho Cucamonga	Previously Disturbed	4 acres	Subtransmission
No. 5	Northeast corner of South Highland Avenue at San Sevaine Road, Fontana	Previously Disturbed	5 acres	Subtransmission
No. 6	Foothill Service Center, Fontana	Previously Disturbed	0.5 acre	Telecommunications
<u>No. 7</u>	<u>(Withdrawn by Applicant)</u>			
<u>No. 8</u>	<u>Northeast corner of Etiwanda Avenue at Napa Street, Rancho Cucamonga</u>	<u>Previously Disturbed</u>	<u>8 acres</u>	<u>Subtransmission</u>

SOURCE: SCE, 2010a; SCE Response to Data Request No. 7, August 30, 2012.

B. Environmental Effects of Additional Potential Staging Area No. 8

The preparation, use, and restoration of Potential Staging Area No. 8 would not cause new significant adverse impacts or more intense significant adverse impacts than were analyzed in the Draft EIR. Of the resource areas contemplated in the Draft EIR and CEQA Guidelines Appendix G, the newly identified potential staging area is most likely to affect biological resources and cultural resources. As discussed below, new or more intense potential significant effects to geology and soils, water resources, and other environmental considerations are not expected to occur.

Biological Resources

The additional staging area could potentially support special-status plants or wildlife species; however, given the level of prior disturbance, the overall likelihood is considered low. Focused, USFWS protocol-level biological surveys were performed for the Project; however, comparable survey data is not available for Potential Staging Area No. 8. Follow-up biological surveys of Potential Staging Area No. 8 indicate that the site supports disturbed ruderal and partially developed habitat. The area is fenced and bordered by Napa Street to the south, Etiwanda Avenue to the west, a developed (industrial use) area to the north, and disturbed sage scrub habitat to the east. The site shows evidence of recent grading, with moderate growth of the invasive Russian thistle (*Salsola tragus*).

The potential staging area is within the occupied range of the coast horned lizard, coast patch-nosed snake, burrowing owl, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, American badger, and Los Angeles pocket mouse. However, habitat on the site is only conducive to the more disturbance-adapted of these species; namely, San Diego black-tailed jackrabbit and burrowing owl. For purposes of this analysis, these species are presumed present. This is consistent with assumptions made in the analysis of potential Project impacts. Therefore, APM-BIO-01 and Mitigation Measure 4.4-2 (Draft EIR, p. 4.4-35) identified for the Project also would be required for Potential Staging Area No.8. Based on a review of site conditions, the site does not support habitat for San Bernardino kangaroo rat, coastal California gnatcatcher, or Delhi sands flower-loving fly. Preconstruction surveys would be required, if the Project or an alternative is approved, to identify the potential presence of special-status plants.

Mitigation Measure Staging Area-BIO-1: Potential Staging Area No. 8 shall be surveyed prior to the commencement of any activities that may modify vegetation, such as clearing or ground-breaking activities, following the most recent CDFG rare plant survey protocol (CDFG, 2009).²⁰ Following surveys, two potential outcomes are possible:

- If special-status plants are not identified during focused surveys or surveys indicate that special-status plant habitat does not occur on-site, impacts would not be anticipated and no further action would be required.
- If special-status plants are identified during surveys, compensation for the losses shall be required by implementing Mitigation Measure 4.4-1, which would result in habitat creation and enhancement, and long-term preservation for temporary and permanent impacts.

Significance after Mitigation: Less than Significant.

Cultural Resources

The cultural records search conducted for the Project included a review of previous studies conducted within a 0.5-mile radius and previously recorded sites within a 0.25-mile radius (Draft EIR, p. 4.5-6). The new staging area is within 0.25 mile of the Project area and no resources were identified in the records search as being within the proposed boundary. In addition, no prehistoric resources have been recorded within 0.25 mile of the Project area (p. 4.5-6).

Focused cultural resources surveys were performed for the Project; however, comparable survey data is not available for Potential Staging Area No. 8. The presence or absence of cultural resources within this area is unknown: it is possible that such resources exist within the unsurveyed area. However, implementation of Mitigation Measure Alternative 1-CUL-1, which would require additional archaeological survey of unsurveyed areas, also would apply to the new potential staging area. With respect to paleontological resources, the staging area would result in the same potential impacts to paleontological resources as the Project because the area is

²⁰ CDFG, 2009. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Available online: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/Protocols_for_Surveying_and_Evaluating_Impacts.pdf (November 24, 2009).

underlain by the same geologic units. Accordingly, Mitigation Measures 4.5-1, 4.5-2, and 4.5-3 (Draft EIR Section 4.5.4, p. 4.5-19 et seq.) also would be required for Potential Staging Area No.8.

Geology and Soils

Because the staging area would be located on flat terrain underlain by similar earth materials, it would result in similar potential impacts with respect to seismic ground shaking and/or seismic-related ground failure, soil erosion, unstable geologic units or soils, and expansive soils. While SCE has not yet prepared a geotechnical investigation of the subtransmission source line route, associated facilities, or telecommunications system, one would be prepared if necessary as part of pre-construction activities. Likewise, review of all geotechnical reports and their incorporation into Project plans would occur prior to issuance of a grading or building permit by the agency with jurisdiction over the construction activity. Design recommendations from existing geotechnical reports also would be relevant and applied to the staging area.

Water Resources

Preparation, use, and restoration of Potential Staging Area No.8 would result in similar potential impacts with respect to existing water quality standards and the potential for increasing erosion and/or flooding. Similar to the Project, the construction, operation, and maintenance of the staging area would generally pose a low threat to water quality due to the level terrain, high rate of soil infiltration, and the regulatory controls that would apply. The mitigation measures that would be required to avoid or reduce the significance of Project impacts also would be required for the staging area (e.g., preparation and implementation of a SWPPP, a WQMP, and, if required, coverage under a water quality certification, and/or WDR). These mitigation measures would be sufficient to reduce potential water quality impacts to a less-than-significant level.

Other Environmental Resources

Potential impacts to other resource topics resulting from the use of Potential Staging Area No. 8 would be similar to impacts analyzed, and mitigated where applicable, as those for the other staging areas discussed in the Draft EIR. Regarding aesthetics, agriculture and forestry resources, and land use, the staging area would only result in the temporary degradation of visual character or quality during the construction period; new sources of substantial light or glare would not adversely affect day or nighttime views in the vicinity. The staging area would not be located on important farmland; would not change any land uses or physically divide a community; nor would it conflict with any applicable land use plans, policies, or regulations.

Use of the staging area would not require additional construction equipment beyond that already described in the Draft EIR. The overall number of workers required for Project construction also would be the same. Therefore, construction-related impacts regarding air quality, greenhouse gas emissions, and noise would be the same as for the Project.

Potential hazardous materials impacts would be mitigated as would the Project through preparation and implementation of a Health and Safety Plan required by Mitigation Measure 4.9-1; fire hazards

would be mitigated through preparation and implementation of a Fire Prevention and Emergency Response Plan required by Mitigation Measure 4.9-6.

No homes or people would be displaced by locating Potential Staging Area No. 8 on a previously disturbed and vacant site. As the number of workers would remain the same as the Project, use of the staging area would not result in increased demand or need for fire protection, police protection, school facilities, parks or recreational facilities, or any other public facilities. There would be no change in wastewater treatment needs, water supply needs, solid waste disposal needs, or stormwater drainage relative to the Project. Implementation of Mitigation Measure 4.17-1, which requires preparation and implementation of a traffic control plan, would reduce any short-term construction traffic and transportation impacts associated with use of the new staging area to a less-than-significant level.

2.6 Individual Responses

This section includes the letters received, with individual comments delineated as indicated above, followed by responses to each comment.

February 29, 2012

Mr. John Boccio
Falcon ridge Substation Project
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San Francisco, CA 94104
E-mail: FalconRidge@esaassoc.com

Re: SCE's Comments on the Draft Environmental Impact Report (DEIR) for the Falcon Ridge Substation Project

Thank you for the opportunity to comment on the above-referenced DEIR. On behalf of Southern California Edison ("SCE"), the proponent of the Falcon Ridge Substation Project ("Proposed Project") that is the subject of the DEIR, SCE appreciates the CPUC's work on the document, and is confident that the project will provide much needed benefits in the designated Electrical Needs Area.

Notwithstanding the above, however, SCE has concerns about some of the analyses contained in the DEIR. This comment letter and the enclosed table of specific comments set forth SCE comments, with a particular focus on the DEIR's analysis of proposed Alternative 1: Lowell Street Realignment Alternative (hereinafter referred to as "Alternative 1"), and its designation as the "environmentally superior alternative" in the DEIR. More specifically, SCE's comments provide additional evidence critical to an accurate analysis of Alternative 1, and explain why impacts associated with the alternative are currently understated in the document. This evidence supports the conclusion that when all impacts are appropriately and realistically accounted for, Alternative 1 would not be environmentally superior to SCE's Proposed Project.

In short, and as explained in further detail below, based on the information known to SCE to date, Alternative 1 has the potential to result in air quality, hazards, and hydrology and water quality impacts that were not adequately discussed, and as a result, were understated, in the DEIR. Moreover, the need for additional remediation at the B.F. Goodrich Superfund Site necessarily dictates that additional environmental impacts may ultimately stem from conflicts between Alternative 1 and ongoing remediation activities intended to address soil and groundwater contamination at the B.F. Goodrich Superfund Site. In light of these additional impacts associated with Alternative 1, the conclusions contained in the DEIR should be revised in the Final EIR ("FEIR") to state that the Proposed Project is in fact the "environmentally superior alternative."

This letter is intended to provide an overview of the SCE's concerns as they relate to this issue. Additional detailed comments on these and other DEIR issues are provided in the table enclosed as with this letter.

I. Overview Of SCE's Comments On The Draft EIR

Under Alternative 1 as analyzed in the DEIR, all aspects of the Proposed Project would remain as described in Chapter 2, *Project Description*, except for the alignment of the Alder Subtransmission Source Line route. This component of Alternative 1 would extend north from Alder Substation, span the

A-1.1

210 Freeway and follow Locust Avenue until its intersection with Lowell Street. It then would extend west along Lowell Street and continue past the end of Lowell Street to N. Alder Avenue. It then would extend south along N. Alder Avenue to Summit Avenue and west along Summit Avenue to Mango Avenue. It then would extend north along the future Mango Avenue ROW until it enters the proposed substation site. The DEIR acknowledges in several places that changing the alignment of the Alder Subtransmission Source Line Route dictates that Alternative 1: “has the potential to cross areas of higher fire hazard classification than the Project alignment and would be adjacent to three sites listed on the USEPA’s CERCLIS database of contaminated sites.” (See, e.g. DEIR p. 3-11). However, the DEIR fails to acknowledge that Alternative 1 requires construction not only “adjacent to,” but also within at least one of the USEPA CERCLIS sites mentioned (i.e., The B.F. Goodrich Superfund Site), and therefore, the DEIR grossly underestimates the potential for environmental impacts associated with constructing Alternative 1.

After considering the aforementioned differences, the DEIR concedes that both the Proposed Project and Alternative 1 would have significant and unavoidable aesthetics, air quality, and noise impacts. (See, e.g. DEIR at p. 5-3.) While Alternative 1 would have the same peak daily emissions of many criteria pollutants as the Proposed Project, during construction, the DEIR concludes, however, that peak daily emissions of PM10 would be reduced by approximately 16 percent per day when compared to emissions expected to be generated by the Proposed Project. (*Id.* at pp. 5-3 – 5-5.) Therefore, the DEIR’s ultimate conclusion is that Alternative 1 is the “environmentally superior alternative,” as between the two, because it would lessen short-term air quality impacts associated with construction of the Proposed Project. (*Id.*)

However, the need for construction within the B.F. Goodrich Superfund Site was not adequately considered in the DEIR. For this reason, the potential for both short-term and long-term impacts associated with air quality; hazards; and hydrology and water quality, were not adequately discussed in the document. When these impacts are appropriately analyzed and disclosed, the DEIR’s conclusions regarding the “environmentally superior alternative” must be revised.

II. Legal Standards and CPUC Policy Governing A Comparison Of Alternatives

As explained on p. 5-1 of the DEIR:

“CEQA does not provide specific direction regarding the methodology of alternatives comparison. Each project must be evaluated for the issues and impacts that are most important; this will vary depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those with long-term impacts (e.g., visual impacts and permanent loss of habitat or land use conflicts). Impacts associated with construction (i.e., temporary or short-term) or those that are easily mitigable to less-than-significant levels are generally considered to be less important.”

This comparison is designed to satisfy the requirements of CEQA Guidelines §15126.6(d), Evaluation of Alternatives, which states that:

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A-1.2

'The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the proposed project as proposed.'

... (emphasis added)."

As noted in the DEIR and above, Alternative 1 will lessen some of the short-term air quality impacts associated with construction of the Proposed Project. However, for the reasons set forth below it has a greater potential to result in new and different short-term and long-term air quality, hazards, and hydrology and water quality impacts, and may result in additional impacts associated with any changes necessitated by implementation of a final remedy at the B.F. Goodrich Superfund Site. Consistent with the DEIR language cited above, the potential long-term impacts should be considered more important for purposes of comparing alternatives. As a result, the Proposed Project, not Alternative 1, should be determined the "environmentally superior alternative" in the Final EIR.

III. Potential Air Quality, Hazards, and Hydrology and Water Quality Impacts Associated With Alternative 1 Dictate That It Should Not Be Designated the "Environmentally Superior Alternative."

As discussed above, portions of the Alder Subtransmission Line Route of Alternative 1 are **directly within** one of those sites, the 160-acre B.F. Goodrich Superfund site. (See Region 9 Superfund Fact Sheet for the B.F. Goodrich site, available at: <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/ViewByEPAID/CAN000905945>.)¹

¹ The USEPA's website for this cleanup operation describes the location as:

The B.F. Goodrich Site includes a 160-Acre Area in Rialto, California where volatile organic compounds (VOCs) and perchlorate have contaminated soil and groundwater. The Site also includes areas of groundwater contamination downgradient of the 160-Acre Area. The 160-Acre Area is bounded by West Casa Grande Drive on the north, Locust Avenue on the east, Alder Avenue on the west, and an extension of Summit Avenue on the south.

As such, under the DEIR's description of Alternative 1, the portion of the Alder Subtransmission Source Line Route that would "extend west along Lowell Street and continue past the end of Lowell Street to N. Alder Avenue" would fall directly within the 160-acre cleanup site.

As further indicated on that website:

The 160-Acre Area was part of a larger area acquired by the United States Army in 1942 to develop an inspection, consolidation, and storage facility for rail cars transporting ordnance to the Port of Los Angeles. Since the United States sold the Rialto property in 1946, a portion of the property has been used by defense

A-1.2
cont.

A-1.3

This failure is critical. Because the DEIR fails to acknowledge that this portion of the Alder Substation Source Line will be constructed within the BF Goodrich Superfund site under Alternative 1, it also fails to adequately analyze environmental impacts that will be associated with the potential for encountering contaminated soil during construction. More specifically, the DEIR fails to: (1) adequately disclose and consider the potential for Alternative 1 to generate emissions of Toxic Air Contaminants (TACs); (2) adequately disclose and consider that Alternative 1 will traverse a site which is included on the list of Hazardous Materials sites compiled pursuant to California Government Code section 65962.5 and appropriately analyze potential hazards impacts associated with the same; and (3) acknowledge that based on the high potential to encounter contaminated soils during construction of Alternative 1, there would likely be an incremental increase in the potential for hydrology and water quality impacts associated with Alternative 1. Each of these failures supports the conclusion that while Alternative 1 is likely to materially lessen short-term air quality impacts associated with PM10 emissions during construction, it has the potential to result in different and potentially more significant air quality, hazards, and hydrology and water quality impacts. As a result, it should not be considered the "environmentally superior alternative" in the Final EIR.

A-1.3
cont.

The Final EIR must address these comments. Specifically, its analysis as it pertains to these key issue areas must be revised and supplemented and Chapter 5, particularly Table 5-2, must be updated to reflect the fact that the Proposed Project is Preferred to Alternative 1, where each of these issue areas is concerned.

A. The DEIR Fails to Analyze TAC Emissions That Will Be Generated During Construction of the Portion of Alternative 1 That Will Run Directly Through The B.F. Goodrich Superfund Site.

As explained above, the DEIR does not acknowledge that Alternative 1 will traverse the B.F. Goodrich Superfund site and, therefore, fails to address the potential that construction of Alternative 1 might disturb contaminated soils and generate TAC emissions. For this reason, the DEIR's discussion of air quality impacts associated with Alternative 1 (*see* p. 4.3-22 in the DEIR) fails to appropriately account for potential air quality impacts under significance criterion d), which asks whether a project would "expose sensitive receptors to substantial pollutant concentrations."

The B.F. Goodrich Superfund site is known to contain soil and groundwater contaminated with trichloroethylene and tetrachloroethene, which are carcinogens that have been identified by the State of California as TACs. Based on the Final B.F. Goodrich Site Investigation, Soil Boring and Vapor Probe Installation Report prepared by CH2MHILL (November 2010), there is soil contamination at depths of 6

A-1.4

contractors, fireworks manufacturers, and other businesses that used perchlorate salts and/or solvents in their manufacturing processes or products. In 1956 and 1957, West Coast Loading Corporation manufactured and tested two products, photoflash flares and "ground-burst simulators," containing potassium perchlorate. From about 1957 to 1962, B.F. Goodrich Corporation conducted research, development, testing, and production of solid-fuel rocket propellant containing ammonium perchlorate, and used solvents in the manufacturing process. Since the 1960s, the 160-Acre Area has been used by a number of companies that manufactured or sold pyrotechnics, including Pyrotronics, Pyro Spectaculars, and American Promotional Events.



to 12 feet in the vicinity of the existing Rialto Concrete Products Inc. operation, located within the B.F. Goodrich site and adjacent to the portion of Alternative 1 at issue. (CH2MHILL report is available at: <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/3dc283e6c5d6056f88257426007417a2/7e612593d7174f24882578220064df6d!OpenDocument>.) For this reason, it is likely that contaminated soil will be encountered during construction of Alternative 1, and the potential short-term and long-term emissions impacts associated with Alternative 1 must be analyzed in greater detail in Section 4.3.5 of the DEIR. The additional analysis consistent with the aforementioned points will almost certainly support the conclusion that even considering the PM10 emission reductions associated with Alternative 1, the Proposed Project should be Preferred to Alternative 1 when air quality impacts, including those associated with potentially harmful TACs, are properly compared.

A-1.4
cont.

B. The DEIR Fails To Analyze Hazards Impacts That Will Be Associated With Constructing Alternative 1 Through The B.F. Goodrich Superfund Site.

The impacts associated with contaminated soil must also be further assessed in the Hazards section of the DEIR. Similar to the Air Quality section described above, the Hazards analysis for Alternative 1 (see p. 4.9-27 of the DEIR) fails to disclose the fact that the Alder Subtransmission Source Line portion of Alternative 1 would not only be adjacent to, but would be within and across, the B.F. Goodrich Superfund site. As a result, the DEIR fails to specifically disclose that for this reason, Alternative 1 would require construction within a site that is included on the list of Hazardous Materials sites compiled pursuant to California Government Code Section 65962.5. This fact requires further analysis pursuant to CEQA significance criterion d), which asks whether a project has the potential to “be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment.” Yet that additional analysis is missing from the DEIR.

While it is true that the DEIR’s analysis of hazards associated with Alternative 1 (see p. 4.9-27 in Section 4.9.5) briefly mentions the B.F. Goodrich Superfund site and notes a “greater likelihood of encountering soil contamination during construction activities of the alternative alignment than of the Project,” it does not describe Alternative 1 as actually traversing the site, does not describe how that implicates CEQA significance criterion d), and provides only a cursory analysis that does little to support a conclusion that Alternative 1 would not have the potential to result in substantially greater hazards-related impacts than the Proposed Project. In fact, that cursory analysis simply concludes that the exact same mitigation measure originally crafted for the Proposed Project – Mitigation Measure 4.1, requiring implementation of a Health and Safety Plan – would mitigate any impacts associated with Alternative 1.

A-1.5

Yet the DEIR fails to provide any justification for its conclusion that the simple implementation of a Health and Safety Plan would be sufficient to avoid any impacts resulting from these known hazards, particularly where an extensive remediation effort overseen by the USEPA is being implemented. The known presence of hazardous materials at the B.F. Goodrich Superfund site, and the fact that a substantial cleanup is ongoing, strongly suggest that additional measures to mitigate any hazards to construction crews, operations staff and the public would likely need to be taken. In contrast, the Alder Subtransmission Source Line portion of the Proposed Project would not be located on a site included on any list of sites known to contain hazardous materials, and no remediation activities are proposed within the construction footprint of the Proposed Project route. Given this

substantial difference between the two proposals, the FEIR should conclude that the Proposed Project is “environmentally superior” to Alternative 1 when hazards impacts are compared.

↑ A-1.5
| cont.

C. The DEIR Fails To Acknowledge The Potential For An Incremental Increase In Hydrology and Water Quality Impacts Associated With Alternative 1.

SCE also would urge the CPUC to consider how the aforementioned comments regarding the Alder Subtransmission Source Line portion of Alternative 1 affect the Hydrology and Water Quality analysis of Alternative 1 (contained on p. 4.10-21 in Section 4.10.5 of the DEIR). The potential for encountering contaminated soil during construction of Alternative 1, and how it might impact the potential for significant hydrology and water quality impacts, is not even disclosed or considered.

Among other things, the Final EIR should note that compared to the Proposed Project, Alternative 1 would result in an incremental increase in the potential for impacts associated with significance criterion a), which asks “whether a project has the potential to violate any water quality standards or waste discharge requirements.” For this reason, Section 4.10.5 must be revised to specifically address whether Alternative 1 might violate such standards or requirements given the hazardous materials known to exist in the soils and groundwater at locations in and around where Alternative 1 would be constructed. Given the existence of those materials, an appropriate analysis of hydrology and water quality impacts associated with Alternative 1, would likely support a conclusion that the Proposed Project is “environmentally superior” to Alternative 1.

A-1.6

IV. The Failure To Appropriately Analyze Alternative 1’s Connection To The B.F. Goodrich Site Results In A Failure To Analyze Impacts That May Be Associated With Accommodating Future Clean-Up Efforts That Are Inconsistent With Portions Of The Site Being Occupied By SCE Facilities.

Finally, SCE would request that the CPUC disclose and analyze the current status of the clean-up at the B.F. Goodrich Superfund Site in the Final EIR. In addition to comments raised above, it is important to note that clean-up at the site has been underway since 2003 and remains ongoing. While data from initial investigation efforts has been used to develop an initial groundwater cleanup plan, a comprehensive remedy for the site has yet to be approved.

Currently, there is insufficient information to determine if Alternative 1 would conflict with current and future remediation activities (e.g. pole locations could conflict with existing or future monitoring wells and/or other underground devices). As such, SCE is concerned that if the CPUC requires construction of Alternative 1: (1) a portion of the line may ultimately be determined infeasible because of the location of existing structures; or (2) that SCE might be required to remove and replace segments of the Alder Subtransmission Source Line when they are subsequently determined to conflict with the locations of future monitoring wells or other clean-up components.

A-1.7

In the event that inconsistencies between Alternative 1 and the B.F. Goodrich Superfund Site clean-up do require construction that is not currently contemplated in the DEIR, there would most likely be additional environmental impacts associated with that construction, impacts which are not analyzed in the DEIR. Most notably, there would likely be additional construction-related air quality impacts,

which may negate the reduction that is the basis for the DEIR's conclusion that Alternative 1 is "environmentally superior" to the Proposed Project.

A-1.7
cont.

V. Conclusion

Constructing Alternative 1 as described in the DEIR, would require traversing the B.F. Goodrich Superfund Site. The DEIR does not acknowledge this fact, and therefore understates potential air quality, hazards, and hydrology and water quality impacts that would be associated with Alternative 1. In turn, this underestimation results in an inaccurate comparison of Alternatives in Chapter 5 of the DEIR.

While the failure to adequately analyze these issues does not require recirculation of the DEIR², SCE urges the CPUC to re-visit the analysis of both the Proposed Project and Alternative 1 with the aforementioned comments in mind. After doing so, SCE requests that appropriate edits reflecting SCE's comments be incorporated into the Final EIR, and that the Comparison of Alternatives Chapter (Chapter 5) be revised to conclude that the Proposed Project, as opposed to Alternative 1, is the "environmentally superior alternative."

A-1.8

SCE appreciates the CPUC's work in analyzing the proposed Falcon Ridge Substation Project and selected alternatives, and the opportunity to provide these comments on the DEIR. SCE looks forward to the CPUC's preparation of a Final EIR and consideration of approval of the Falcon Ridge Substation Project.

Sincerely,



Thomas Diaz

cc:

Enclosures:

Comment Table
Revised Figures 2-2, 2-3 and 2-5

² See CEQA Guidelines § 15088.5 ("New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. . . . (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies. . ."). First, SCE's comments do not relate to the Proposed Project, but rather to an alternative, Alternative 1. In addition, the DEIR does disclose the fact that the B.F. Goodrich Superfund site is located in close proximity to the Alder Subtransmission Source Line portion of Alternative 1, and even a quick review of the figures in the DEIR (e.g. DEIR Figure 4.9-1) would provide the reader with a meaningful opportunity to comment on the proximity of the site to Alternative 1, as well as any impacts that might be associated with construction adjacent to or within the cleanup site.

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Executive Summary	ES-1	Under the heading ES.1 Introduction/Background , the text explains that Alternative 1: Lowell Street Realignment Alternative is the Environmentally Superior Alternative, however for reasons explained in SCE’s accompanying cover letter, the analysis of Alternative 1 in the DEIR is incomplete and omits information that demonstrates that SCE’s Proposed Project should be considered the Environmentally Superior Alternative.	[Please revise the conclusion accordingly.]
Executive Summary	ES-2	Under the heading ES.2 Project Objectives , the seventh bullet point contains the number 2 at the end of the sentence, however it is unclear if it is related to the footnote seen at the end of the page. Additionally, regarding the footnote 2, the contents of the referenced email are not clearly related to the text in the document.	[Please clarify whether the number 2 is related to the footnote and provide additional context for the email that is being referenced in the footnote.]
Executive Summary	ES-4	Under the heading Project Components , the text references 2.7 acres which is the substation footprint but it should be clarified that the entire parcel is 7.5 acres.	SCE proposes to construct, operate, and maintain a 66/12 kV unattended, automated, 56 megavoltampere (MVA) low-profile substation (the Falcon Ridge Substation) on an approximately 2.7 acres of an <u>approximately 7.5-acre parcel</u> located just south of Casa Grande Avenue, east of Sierra Avenue, north of Summit Avenue and adjacent to SCE’s existing transmission ROW, in the City of Fontana, California.
Executive Summary	ES-4	Under the heading Project Component , the text incorrectly references the underground vaults as distribution getaways. For reference, a vault is a component of a getaway.	In addition to the proposed substation, the Project would include the installation of two subtransmission source line segments; construction of <u>three new distribution getaways</u> five new underground vaults, which also are referred to as distribution getaways ; telecommunications (fiber-optic) infrastructure work; and upgrades to existing optical communications equipment at Etiwanda, Alder, and Randall Substations. “Construction of five <u>three</u> underground 12 kV distribution “getaways.”

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A-1.12

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FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Executive Summary	ES-4	Under the heading Project Components , the text incorrectly references 115 kV as the subtransmission source line voltage instead of 66 kV.	One segment would be approximately 3 miles in length to form the new Alder 115 <u>66</u> kV Subtransmission Source Line; the other would be approximately 9 miles in length to form the new Etiwanda 66 kV Subtransmission Source Line.
Executive Summary	ES-4	As currently written, “16- 12 kV distribution circuits” may inadvertently lead some readers to incorrectly conclude that both 16 kV and 12 kV circuits are being discussed when in fact sixteen separate 12 kV circuits are being discussed.	Within the substation site, distribution circuits would be placed in an underground conduit system. At ultimate build out, the Falcon Ridge Substation could accommodate 16 <u>sixteen separate</u> 12 kV distribution circuits.
Executive Summary	ES-4	Under the heading Project Components , please revise the discussion of underground components to accurately describe the underground conduit system(s). Please make the same edit in the Project Description discussion of the underground conduit system(s).	Within the substation site, distribution circuits would be placed in an underground conduit system, <u>also known as a “distribution getaway”</u> . <u>A distribution getaway consists of multiple vaults connected by one or more conduit systems (a conduit is also sometimes referred to as a duct).</u>
Executive Summary	ES-5	Under the heading Applicant Proposed Measures , the PEA did not identify any measures related to aesthetics as there were less than significant impacts.	These measures relate to aesthetics , biological resources and paleontological resources.
Executive Summary	ES-5	Under the heading Applicant Proposed Measures regarding APM BIO 01, the last sentence of the text is related to APM BIO 02 and should be removed.	If the Biologist finds an active nest within the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist will delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. The active site will be protected until nesting activity has ended to ensure compliance with the MBTA and California Fish and Game Code. Encroachment into the buffer area around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants. APM BIO 02: Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Sage Scrub, and Annual Grassland/Disturbed Riversidean Alluvial Fan Sage Scrub Project impacts on sage scrub vegetation.

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2-51

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Executive Summary	ES-6	APM-BIO-02 identifies that SCE will create a restoration program off-site for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub and annual grassland/disturbed Riversidean alluvial fan sage scrub. SCE would like to mitigate for these permanent impacts by paying into a local conservation bank such as the Cajon Creek Conservation Bank. SCE initially planned to mitigate near the Proposed Project area but any habitat improvements in this area would not fit into the City's General Plan which has the majority of undeveloped land zoned for residential and light industrial uses. Habitat purchased and improved locally by this mitigation measure may become isolated by future development and have little biological value for many species in the region. Payment of mitigation fees to a local conservation bank will help to improve or purchase contiguous habitat in areas of high biological value.	<p>...The site shall be monitored and maintained for a suitable number of years to ensure successful establishment of Riversidean alluvial fan sage scrub habitat within the restored and created areas, as determined by the resource agencies.</p> <p><u>In lieu of developing an offsite restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition and habitat types present are comparable to impacted habitat at the Proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable, local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.</u></p>
Executive Summary	ES-7	Please conform the description of the No Project Alternative contained in the Executive Summary to the descriptions provided in the remainder of the document.	[Please revise the text accordingly.]

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2-52

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Executive Summary	ES-7	The text incorrectly estimates the number of TSPs and the use of wood poles that would likely be necessary for Alternative 1: Lowell Street Realignment Alternative. Subsequent to the issuance of the DEIR, a preliminary engineering analysis indicated that the following overhead facilities may be required to accommodate Alternative 1: approximately 12 TSPs, 76 LWS poles, and 6 wood/LWS guy poles.	Three Approximately twelve tubular steel poles (TSPs) would be required, one at each of the proposed corners. Wood Approximately 76 light weight steel (LWS) poles and 6 wood/LWS guy poles would be installed along the extension of Summit Avenue, <u>Mango Avenue, North Alder Street, Lowell Street</u> and along Locust Avenue.
Executive Summary	ES-8	Under the heading ES.5 Environmentally Superior Alternative , the following statement does not recognize the potential environmental impacts associated with Alternative 1 as explained in SCE’s accompanying cover letter: “The remaining alternative to the Project, Alternative 1, would not result in any new significant impacts, but would result in a materially lessening of impact to air quality, specifically peak daily emissions of particulate matter less than 10 microns in diameter (PM10) and less than 2.5 microns in diameter (PM2.5) would be reduced by approximately 16 percent (i.e., PM10 would be reduced by approximately 40 pounds and PM2.5 would be reduced by approximately 2.5 pounds) when compared to the Project. Therefore, Alternative 1 is considered the environmentally superior alternative.”	[Please revise the text accordingly.]
Executive Summary	ES-11	Regarding Table ES-1 Summary of Impacts and Mitigation Measures for the Project , all comments relating to impact conclusions as well as mitigation measures can be found later in this comment table’s applicable resource section.	[Please revise the text accordingly.]

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2-53

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Executive Summary	ES-12	Revise Table ES-1 per the above explanation.	<u>As an alternative to developing an offsite restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would have the option to pay mitigation fees to a local conservation bank such as the Cajon Creek Conservation Bank under the guidance of the appropriate resource agencies.</u>
Executive Summary	ES-13	Regarding Table ES-1 Mitigation Measure 4.4-4, the fourth bullet point states that SCE will “shield wires to minimize the effects from bird collisions.” This statement is inaccurate. A shield wire is another term for a static wire. Flight diverters are added to the shield wire in areas that have bird migratory routes or water crossings. Flight diverters are not generally used in construction; only in areas that have high risk for collision. Therefore this bullet point is inapplicable.	<ul style="list-style-type: none"> • Shield wires to minimize the effects from bird collisions.
Executive Summary	ES-23	Regarding Table ES-2 , conclusions regarding preference for the Project and Alternative 1 are inconsistent with those conclusions represented in Table 5-2 . See Chapter 5 comments for additional concerns related to conclusions contained in this table.	[Please revise the text accordingly.]

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2-54

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Introduction	1-3	<p>Regarding Table 1-1 Summary of Potential Permit Requirements, as previously explained to the CPUC via a data request in February 2011, the following revisions should be made to the table:</p> <p>Under the heading State in Table 1-1, please add a Streambed Alteration Agreement (1600) from California Department of Fish and Game for construction, operation and maintenance which may modify the bed, bank, or channels of any streambeds.</p> <p>Under the heading State in Table 1-1, please remove the Aerial Utility Crossing Permit and place it under the heading Regional and Local in Table 1-1.</p> <p>Under the heading State in Table 1-1, SCE did not identify the need for a wire crossing permit from BNSF, but rather an Encroachment Permit or Agreement from the Southern California Regional Rail Authority (SCARRA) for work that would encroach upon a railroad ROW.</p> <p>Under the heading Regional and Local in Table 1-1, please revise the reference to National Pollution Discharge Elimination System Construction Stormwater Permit to National Pollution Discharge Elimination System Construction General Permit.</p>	<p align="center">[Please revise the text accordingly.]</p>

2-55

A-1.26

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-56

Section	Page	Comment	Suggested Revision
Introduction	1-4	Under the heading Regional and Local in Table 1-1 , please clarify that only a ministerial Grading Permit would be obtained from the local jurisdictions. Additionally, the SWPPP is separate from the grading permit is already described above. Under the heading Regional and Local in Table 1-1 , the SPCC is not a permit but rather a plan and should be removed from the table.	[Please revise the text accordingly.]
Project Description	2-3	Under the heading 2.2 Project Location , please revise this paragraph to accurately depict the full extension of the proposed 66 kV subtransmission lines within existing ROW and consistent with Figure 2-2 . In addition, please also revise this paragraph to account for the fact that not all subtransmission facilities would be located entirely within SCE’s existing transmission ROW.	The 66 kV subtransmission facilities would then again extend northeast within SCE’s existing transmission ROW until it intersects with <u>to a point approximately one-quarter mile north of</u> Summit Avenue. The 66 kV subtransmission facilities would then extend east <u>primarily</u> on SCE’s existing transmission ROW until it reaches the Falcon Ridge Substation.
Project Description	2-4	Under the heading 2.6.1.1 Falcon Ridge Substation , please add the term asphalt to the description of the type of concrete that would be used for the access road.	The Falcon Ridge Substation would include a 66 kV switchrack, a 66 kV Circuit Breakers and Disconnect Switches, two 28 MVA, 66/12 kV Transformers, one 12 kV Switchrack, capacitor banks, a Mechanical and Electrical Equipment Room (MEER), distribution getaways, a restroom facility, a <u>an asphalt</u> concrete access road, lighting, perimeter walls, gates, and drainage. Figure 2-3, Proposed Substation Layout , depicts the preliminary plan view of the Falcon Ridge Substation.
Project Description	2-4	Under the heading Substation Equipment and Associated Facilities (66 kV Switchrack) , please revise the text to accurately describe the dimensions of the switchrack.	One steel 66kV switchrack, up to 154 <u>196</u> feet long by 82 feet wide by 25 feet high would be installed. The switchrack would consist of eight 18 <u>22</u> -foot-wide positions (e.g., two for subtransmission source lines, two for transformer banks, one for a bus-tie between the operating and transfer buses; and three vacant for future use).
Project Description	2-5	Figure 2-2 is not inclusive of all the access roads as explained in Section 2.9.1 Access Roads .	Please utilize the attached revised Figure 2-2.

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FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Project Description	2-6	Please replace existing Figure 2-3 with the revised Figure 2-3 provided by SCE. In particular, please note the following changes: <ul style="list-style-type: none"> • The 2 TSPs and associated subtransmission lines would be moved outside of the substation wall (as shown in close up detail to the figure in the right). • The restroom has been relocated from the east side of the substation to the west side of the substation. • 66kV capacitors have been deleted from view as they are not part of the Falcon Ridge Substation Project. 	Please utilize the attached revised Figure 2-3.
Project Description	2-7	Under the heading Substation Equipment and Associated Facilities (66 kV Switchrack) , please revise the text to note the updated anticipated dimensions of the operating and transfer bus.	Each operating and transfer bus would be 144 <u>196</u> feet long and consist of two 1,590 kcmil (thousand circular mills) Aluminum Conductor Steel Reinforced (ACSR) for each of the three electrical phases.
Project Description	2-7	Under the heading Substation Equipment and Associated Facilities (Mechanical and Electrical Equipment Room (MEER)) , please revise the text to note the updated anticipated dimensions of the MEER building.	The MEER dimensions would be approximately 36 feet long by 20 <u>15</u> feet wide by 11 feet tall.

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2-57

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Project Description	2-8	Under the heading Substation Equipment and Associated Facilities (Restroom Facility) , please revise the restroom facility description as indicated to the right.	Currently, there is potable water service available at the site; however, no feasible sewer service option is available. Therefore, a portable chemical unit would be placed within the substation perimeter wall, and maintained by an outside service company. If at the time of final engineering, both sewer and water connections become available, a standalone prefabricated permanent restroom may be installed in close proximity to the MEER. <u>Additionally, another potential option could include a permanent restroom equipped with a self-contained waste disposal system installed within the substation perimeter near the entry gate.</u> The approximate dimensions of the restroom facility would be 10 feet long by 10 feet wide by 10 feet high.
Project Description	2-8	Under the heading Substation Equipment and Associated Facilities (Distribution Getaways) , please note that “16- 12 kV distribution circuits” may inadvertently lead some readers to incorrectly conclude that both 16 kV and 12 kV circuits are being discussed where in fact sixteen separate 12 kV circuits are being discussed.	Within the substation site, distribution circuits would be placed in an underground conduit system. At ultimate build out, the Falcon Ridge Substation could accommodate 16 <u>sixteen separate</u> 12 kV distribution circuits.
Project Description	2-8	Under the heading Substation Equipment and Associated Facilities (Distribution Getaways) , the following sentence is incorrect and should be updated, as the distribution circuits are not subject to supplemental CEQA analysis per General Order No. 131-D. “Supplemental CEQA analysis may be required before these circuits are constructed, operated, and maintained in the future.”	Supplemental CEQA analysis may be required before these circuits are constructed, operated, and maintained in the future. Under General Order No. 131-D, the future 12 kV distribution circuits would not be subject to additional CEQA analysis.

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2-58

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-59

Section	Page	Comment	Suggested Revision
Project Description	2-10	Under the heading Substation Equipment and Associated Facilities (Perimeter Wall) , it should be clarified that SCE would only apply for a ministerial grading permit (as explained in GO 131-D). Additionally, Fontana Ordinance 1625 does not contain specific information related to substation landscaping, therefore SCE would to the extent practicable be consistent with Fontana Ordinance 1625.	SCE would consult with the City of Fontana to develop an appropriate landscaping plan and perimeter wall design that would be submitted with the <u>ministerial</u> grading permit application for the Project. The landscaping plan, <u>to the extent practicable</u> , would be consistent with Fontana Ordinance 1625, Landscaping and Water Conservation.
Project Description	2-10	Under the heading Substation Equipment and Associated Facilities (Substation Drainage) , as explained in a prior comment, it should be clarified that SCE would only apply for a ministerial grading permit.	SCE would prepare final engineering drawings for grading and drainage, and submit these drawings to the City of Fontana to obtain a <u>ministerial</u> grading permit.
Project Description	2-10	Under the heading Substation Equipment and Associated Facilities (Substation Drainage) , please revise the text to state that an SPCC plan will be prepared if the Project meets the requirements as stated in 40 C.F.R. Parts 112.1-112.7.	<u>A Spill Prevention and Control Countermeasures (SPCC) Plan will be prepared if the project meets the requirements as stated in 40 C.F.R. Parts 112.1-112.7. Based on the anticipated volume of hazardous liquid materials, such as mineral oil, in use at the site being in excess of 1,320 gallons, a Spill Prevention and Control Countermeasures (SPCC) Plan would be required (40 C.F.R. Parts 112.1-112.7). Typical SPCC...</u>
Project Description	2-12	Under the heading 2.6.2 Subtransmission Source Lines , please revise this paragraph to accurately depict the full extension of the proposed 66 kV subtransmission lines within existing ROW and consistent with Figure 2-2 . In addition, please also revise this paragraph to account for the fact that not all subtransmission facilities would be located entirely within SCE's existing transmission ROW.	The 66 kV subtransmission line would then again extend northeast within SCE's existing transmission ROW, <u>to a point approximately one-quarter mile north of until it intersects with Summit Avenue</u> . The 66 kV subtransmission line would then extend east <u>primarily</u> on SCE's existing transmission ROW until it reaches the substation site.

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FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision																									
Project Description	2-12 & 2-14	Please revise the contents of Table 2-1 as well as the text on page 2-14 under the heading 2.6.3.2 Light Weight Steel Poles to correctly depict the potential measurement of LWS poles to account for some poles which may be shorter and narrower (some of which may be used as guy stub poles instead of wood poles) separate from LWS poles which would be used as conductor supporting structures. Please also note that the appearance of any LWS guy poles would be substantially similar to the appearance of a wood guy pole (as shown in Figure 2-5) in terms of size and shape.	LWS poles typically range from 65-35 to 100 feet ags with a base diameter of 2-1 to 3 feet tapering to approximately 1 foot diameter at the top of the pole. <div style="text-align: center;"> <p>TABLE 2-1 APPROXIMATE SUBTRANSMISSION STRUCTURE DIMENSIONS</p> <table border="1"> <thead> <tr> <th>Pole Type</th> <th>Approximate Diameter</th> <th>Approximate Height Above Ground</th> <th>Approximate Auger Hole Depth</th> <th>Approximate Auger Hole Diameter</th> </tr> </thead> <tbody> <tr> <td>Wood</td> <td>1 to 2 feet</td> <td>35 to 75 feet</td> <td>8 to 10 feet</td> <td>2 to 4 feet</td> </tr> <tr> <td>Light Weight Steel (LWS)</td> <td>2 to 3 feet</td> <td>65 to 100 feet</td> <td>8 to 11 feet</td> <td>2 to 4 feet</td> </tr> <tr> <td>Tubular Steel Pole (TSP)</td> <td>2 to 4 feet</td> <td>70 to 100 feet</td> <td>Not Applicable</td> <td>Not Applicable</td> </tr> <tr> <td>TSP Concrete Foundation</td> <td>5 to 8 feet</td> <td>2 to 4 feet</td> <td>20 to 30 feet</td> <td>5 to 8 feet</td> </tr> </tbody> </table> <p><small>SOURCE: SCE, 2010a</small></p> </div>	Pole Type	Approximate Diameter	Approximate Height Above Ground	Approximate Auger Hole Depth	Approximate Auger Hole Diameter	Wood	1 to 2 feet	35 to 75 feet	8 to 10 feet	2 to 4 feet	Light Weight Steel (LWS)	2 to 3 feet	65 to 100 feet	8 to 11 feet	2 to 4 feet	Tubular Steel Pole (TSP)	2 to 4 feet	70 to 100 feet	Not Applicable	Not Applicable	TSP Concrete Foundation	5 to 8 feet	2 to 4 feet	20 to 30 feet	5 to 8 feet
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TSP Concrete Foundation	5 to 8 feet	2 to 4 feet	20 to 30 feet	5 to 8 feet																								
Project Description	2-13	Please replace Figure 2-5 with the updated figure provided by SCE with these comments. Based on prior comment regarding the use of light weight steel (LWS) guy poles rather than wood guy stub poles. A footnote has been added to the figure.	Please utilize the attached revised Figure 2-5.																									
Project Description	2-14 & 15	Under the heading 2.6.3.4 Relocation of Existing Distribution Facilities , please revise the description of the locations where pole relocation activities would occur to include the removal of distribution poles and transferring of distribution lines and other third party lines to the proposed subtransmission poles along future Mango Avenue south of Summit Avenue. See revised Figure 2-2 .	The following modifications are based on preliminary engineering and the facilities as they currently exist in the field: <u>Location 7: In the area of future Mango Avenue south of Summit Avenue, approximately twelve distribution poles would be removed and the existing facilities transferred to the proposed subtransmission poles.</u>																									

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2-60

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-61

Section	Page	Comment	Suggested Revision
Project Description	2-16	Under the heading 2.7 Right-of-Way Requirements , SCE currently does not have the existing rights to install new subtransmission facilities along the existing 500 kV ROW. SCE would require easements on the 30-foot strip of land.	<p><u>SCE would need to upgrade existing rights for a strip of land approximately 30-foot wide by approximately 6 miles long located within the existing 250 foot wide ROW.</u></p> <p><u>SCE would also utilize a 30-foot-wide strip of land located within the existing 330-foot-wide ROW corridor extending approximately 2.5 miles in length. In addition, SCE would need to acquire rights for a 30-foot-wide strip of land located outside of the existing transmission ROW, extending approximately 1 mile.</u></p> <p><u>Finally, SCE would need to acquire approximately 13 acres of new ROW for the subtransmission source lines and access roads. SCE would acquire a 30-foot wide easement for the subtransmission source lines for a distance of approximately 3.6 miles. SCE would need to upgrade approximately 24 acres with a 30 foot wide strip of land located within the existing 250 foot wide ROW corridor which extends 7 miles along the</u> <u>SCE's existing transmission ROW. SCE would also utilize approximately 7.5 acres with a 30 foot wide strip of land located within the existing SCE fee owned 330 foot wide, 2 miles in length transmission ROW. Finally, SCE would need to acquire approximately 13 acres of new ROW for the subtransmission source lines and access roads. SCE would acquire a 30 foot wide easement for the subtransmission source lines for a distance of approximately 3.6 miles</u></p>
Project Description	2-17	Under the heading 2.8.1 Geotechnical Investigations , geotechnical investigation may be determined unnecessary based on a review of preliminary engineering.	SCE would <u>may</u> continue to conduct geotechnical investigations. The investigations would include an evaluation of the water table depth, evidence of faulting, liquefaction potential, physical properties of subsurface soils, soil resistivity, slope stability, and the presence of hazardous materials.
Project Description	2-18	Under the heading 2.9 Construction , the following sentence alludes to a type of order for construction activities, however multiple components could be under construction simultaneously: "Project construction would generally occur in the following manner:"	<u>Project construction would generally occur in the following manner consist of the following components:</u>

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FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-62

Section	Page	Comment	Suggested Revision
Project Description	2-19	Under the heading 2.9.1 Access Roads , please revise the text description of access roads to note that access road widths may vary depending on site specific conditions and roadway design criteria such as curve dimensions.	The graded road would have a minimum drivable width of 14 feet with 2 feet of shoulder on each side but may be wider depending upon field conditions <u>as well as at some individual curve locations.</u>
Project Description	2-20	Under the heading 2.9.1 Access Roads , please revise the text description of access roads to note that road gradients would not exceed 14 percent.	Additionally, for new access roads, road gradients would be leveled so that any sustained grade does not exceed 12 14 percent.
Project Description	2-21	Under the heading 2.9.1 Access Roads , please add the term asphalt to the description of the type of concrete that would be used for the access road.	A new 24-foot wide paved access road accessed via a <u>an asphalt</u> concrete driveway along Sierra Avenue would be utilized for both substation and subtransmission line access. It is described in Section 3.1.1 Falcon Ridge Substation Description, subsection Substation Access. New 14-foot stub roads extending from this paved access road would be constructed in order to provide access to any subtransmission structures between Sierra Avenue and Mango Avenue ROW. These stub roads would be approximately 1,100 feet in length.
Project Description	2-21	Under the heading 2.9.1 Access Roads , please revise the text to account for driveway aprons.	A concrete driveway <u>apron</u> would be provided for all access roads extending from major roads.
Project Description	2-22	Under the heading 2.9.2 Staging Area/Laydown Areas , please revise the description of staging areas to note that if one of the locations has become unavailable, SCE would seek a comparable location if necessary.	The following locations are expected to be used as staging areas for the Project: south of Foothill Boulevard at Pepper Avenue, Rialto; the Etiwanda Substation; the Falcon Ridge Substation; northwest corner of Etiwanda Avenue at Foothill Boulevard; northeast corner of South Highland Avenue at San Sevaine Road; and the Foothill Service Center (see Figure 2-6, Potential Staging Area Locations). <u>Please note that to the extent that a non-SCE owned location from this list has become unavailable and an additional staging area is determined to be necessary, SCE would seek a substantially similar and comparable location to be used as a staging area.</u>
Project Description	2-24	Under the heading 2.9.2 Staging Area/Laydown Areas , please revise the text to note that material delivery schedules would vary throughout the progress of the Project, with most occurring during off-peak hours.	Delivery <u>Generally, delivery</u> of materials and equipment by truck would occur during off-peak commute hours.

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A-1.53

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Project Description	2-26	Under the heading 2.9.4.1 Pole Installation (Wood and Light Weight Steel Poles) , please revise the text description of LWS poles to note that they consist of multiple sections.	Wood poles are single units while LWS poles consist of separate base and top <u>multiple</u> sections.
Project Description	2-26	Under the heading 2.9.4.1 Pole Installation (Wood and Light Weight Steel Poles) , please revise the text to note that the assembly of LWS poles may not necessarily require bolting or welding.	For LWS poles, after the base section is secured, the top <u>remaining</u> sections would be placed onto the base section and the two sections would be bolted together. The two sections may also be spot welded together for additional stability <u>set into place.</u>
Project Description	2-27	Under the heading 2.9.4.1 Pole Installation (Tubular Steel Poles) , please revise the text to note that mud slurry would be placed in the hole during drilling as required to prevent the sidewalls for sloughing.	Mud slurry would be placed in the hole after <u>during</u> drilling as required to prevent the sidewalls from sloughing.
Project Description	2-27	Under the heading 2.9.4.1 Pole Installation (Tubular Steel Poles) , please revise the text description of TSP to note that they consist of multiple sections.	TSPs consist of a separate base and top <u>multiple</u> sections.
Project Description	2-27	Under the heading 2.9.4.1 Pole Installation (Tubular Steel Poles) , please revise the text to note that the assembly of TSP may not necessarily require bolting or welding.	When the base section is secured, the top section of the TSP would be set into place onto the base section and the two sections would be bolted together. The two sections may also be spot welded together for additional stability <u>remaining sections would be set into place.</u>
Project Description	2-28	Under the heading 2.9.4.2 Underground Subtransmission Source Line Installation (Trenching) , until site specific and field conditions are adequately known, the exact dimensions of all subtransmission trenching cannot be known, however trenches are typically approximately 20 inches wide and 60 inches deep.	<u>Typically, a</u> A 20-inch wide by 60-inch deep trench would be required to place the 66 kV subtransmission line underground.

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2-63

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-64

Section	Page	Comment	Suggested Revision
Project Description	2-36	Under the heading 2.9.12 Storm Water Pollution Prevention Plan , Construction General Permit coverage is not obtained from the Santa Ana RWQCB. Rather, the application is submitted to the State Water Resources Control Board.	Construction of the Project would disturb a surface area greater than 1 acre; therefore, SCE would be required to obtain coverage under the Statewide Construction General Permit (Order No. 2009-0009-DWQ) from the Santa Ana RWQCB.
Project Description	2-44	Under the heading 2.12 Construction Schedule , please add a footnote that references the Rialto Municipal Code, which states that the construction of public utility projects subject to the regulatory jurisdiction of the California Public Utilities Commission is exempt from otherwise applicable noise regulations.	Work hours would be in accordance with local noise ordinance (Table 2-7) with variances to be obtained from the local jurisdiction as necessary in the event construction activities would occur on days or hours outside of what is specified by ordinance. [Please add footnote:] <u>Additionally, it should be noted that, for construction activities occurring within the City of Rialto, Rialto Municipal Code Section 9.50.060 exempts “[c]onstruction, operation, maintenance and repairs of equipment, apparatus or facilities ...including... those of public utilities subject to the regulatory jurisdiction of the California Public Utilities Commission.”</u>
Project Description	2-44	Under the heading 2.13 Applicant Proposed Measures , as previously explained, SCE did not provide APMs for aesthetics.	SCE identified a number of applicant proposed measures (APMs) that would avoid or reduce potential impacts of the Project related to aesthetics, biological resources and paleontological resources.
Project Description	2-45	Under the heading 2.13 Applicant Proposed Measures , as previously explained please update the language for APM-BIO-02.	[Please revise the text accordingly.]
Alternatives	3-6	Regarding Table 3-2 , for Alternative 1, the environmental criteria column should include a summary of impacts related to TAC emissions.	<u>Has potential to generate higher TAC emissions because it traverses a contaminated site that contains, among other things, the chemicals trichloroethylene and tetrachloroethene which are known carcinogens.</u>
Alternatives	3-6	Regarding Table 3-2 , for Alternative 1, the <u>Hazards</u> section of the environmental criteria column should be revised.	<u>Hazards:</u> Has potential to cross areas of higher fire hazard classification and would be adjacent to three <u>two</u> sites and <u>within one site</u> listed on the USEPA’s CERCLIS database of contaminated sites.

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A-1.65

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Alternatives	3-6	Regarding Table 3-2 , for Alternative 1, the environmental criteria column should include a summary of potential impacts related to <u>Hydrology and Water Quality</u> . These impacts will be discussed in further detail below.	<u>Hydrology and Water Quality: potential for incremental increase in Hydrology and Water Quality impacts because it would be adjacent to two sites and within one site listed on the USEPA's CERCLIS database of contaminated sites.</u>
Alternatives	3-6	Regarding Table 3-2 , for Alternative 1, the environmental criteria column should include a summary of impacts related to aesthetics and noise, if there is no difference from the Project that should be noted.	[Please revise the text accordingly.]
Alternatives	3-6	The text in Table 3-2 incorrectly estimated the number of TSPs and the use of wood poles for Alternative 1: Lowell Street Realignment Alternative. Subsequent to the issuance of the DEIR, a preliminary engineering analysis indicated that the following overhead facilities may be required to accommodate Alternative 1: Approximately 12TSPs, 76 LWS poles, and 6 wood/LWS guy poles.	Three <u>Approximately twelve</u> tubular steel poles (TSPs) would be required, one at each of the proposed corners. <u>Wood</u> Approximately 76 light weight steel (LWS) poles and 6 wood/LWS guy poles would be installed along the extension of Summit Avenue, Mango Avenue, North Alder Street, Lowell Street and along Locust Avenue.
Alternatives	3-6 & 3-13	Based on a preliminary analysis, SCE estimates that a one mile 12 kV distribution circuit will be needed at each of the substations under this alternative. Please revise Table 3-2 under Alternative 2: Phase Construction and text on page 3-13 under the heading 3.5.1 Alternative 2: Phased Construction Alternative (Rationale for Elimination) .	Modifications would include: <ul style="list-style-type: none"> • Replacement of two 22.4 MVA transformers with two 28 MVA transformers at the Randall Substation, extension of distribution switchrack, and construction of one 4-mile 12 kV distribution circuit <u>estimated to be approximately one mile in length</u>; and • Replacement of two 22.4 MVA transformers with two 28 MVA transformers at the Alder Substation, relocation of existing substation equipment, equipment upgrades, and construction of one 4-mile 12 kV distribution circuit <u>estimated to be approximately one mile in length</u> (SCE, 2011a).

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2-65

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Alternatives	3-11	Under the heading 3.4.1 Alternative 1: Lowell Street Realignment Alternative (Description) , the text incorrectly estimated the number of TSPs and the use of wood poles for Alternative 1. Subsequent to the issuance of the DEIR, a preliminary engineering analysis indicates that the following overhead facilities may be required to accommodate Alternative 1. Approximately 12 TSPs, 76 LWS poles, and 6 wood/LWS guy poles.	Three Approximately twelve tubular steel poles (TSPs) would be required, one at each of the proposed corners. Wood Approximately 76 light weight steel (LWS) poles and 6 wood/LWS guy poles would be installed along the extension of Summit Avenue, <u>Mango Avenue, North Alder Street, Lowell Street</u> and along Locust Avenue.

A-1.70

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Alternatives	3-11	Under the heading 3.4.1. Alternative 1: Lowell Street Realignment (Description) , while the DEIR included the major components of the alternatives, there is additional detail associated with Alternative 1 that should be included for reference in this section.	<p>[At the end of the section please include the following:]</p> <p>Additional detail regarding Alternative 1 is as follows:</p> <ul style="list-style-type: none"> • Removal of one existing LWS pole and replacement with one new TSP outside of Alder Substation. • Reconfiguring of several existing pole heads to accommodate the additional circuit from Alder Substation. • Removal of approximately 31 existing wood distribution poles along Locust Avenue that contain distribution facilities, SCE telecommunications cable and three third party (private) communication lines. Installation of new LWS poles and TSPs along Locust Avenue to accommodate the new 66 kV source line and the existing distribution facilities. The three third party (private) communication lines would have the option of attaching to the new subtransmission poles or relocating/re-routing due to the voltage increase. • Installation of a combination of LWS poles and TSPs along Lowell Street, N. Alder Avenue, Summit Avenue and Mango Avenue. • Installation of several wood/LWS guy poles at several locations along the route. • Existing sidewalks would need to be repaired and widened at several locations along the route. • New access roads would be required to construct and maintain the subtransmission facilities. • New fiber optic cable would be attached to the new subtransmission poles • The final alignment and configuration of the new 66 kV line crossing private property between the end of Lowell Street and Alder Avenue will be determined during negotiations for easements with the property owner. Easements will also be required along the future west side of Mango Avenue. Easements will be required on Lowell Street to allow the poles to be set behind the future curb. Easements rights will be required to be upgraded on Locust in addition to overhang easements at Locust Avenue and Lowell Street. Overhang and/or anchor guy easements may be required along Locust Avenue, and at the corner of Alder Avenue and Summit Avenue.

2-67

A-1.71

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Alternatives	3-11	Under the heading 3.4.1. Alternative 1: Lowell Street Realignment (Description) , additional information should be included to accurately reflect the description of the alternative.	This component of Alternative 1 would consist of the new 66 kV subtransmission facilities that would leave Alder Substation on existing structures (Etiwanda-Alder-Randall 66 KV Subtransmission Line) to the west for approximately 600 feet and would include removing one LWS pole, replacing it with one new TSP, and re-framing pole-heads to accommodate the second circuit. The new 66 KV subtransmission facilities on new structures would then extend north on Locust Avenue (spanning the 210 Freeway) and continue north along Locust Avenue (overbuilding an existing 12kv line) until it intersects with Lowell Street, extend north from Alder Substation, spanning the 210 Freeway and following Locust Avenue until its intersection with Lowell Street. It then would extend west along Lowell Street and continue past the end of Lowell Street to N. Alder Avenue. It then would extend south along N. Alder Avenue to Summit Avenue and west along Summit Avenue to Mango Avenue. It then would extend north along the future Mango Avenue ROW until entering the proposed substation site.
Alternatives	3-12	Under the heading 3.4.1 Alternative 1: Lowell Street Realignment Alternative (Potential New Impacts Created) please clarify that the Alternative would be adjacent to two sites and within one site listed on the USEPA’s CERCLIS database of contaminated sites.	Alternative 1 would locate construction activities near residential and other receptors east of Locust Avenue and south of Lowell Street. It also has the potential to cross areas of higher fire hazard classification than the Project alignment and would be adjacent to three two sites and within one site listed on the USEPA’s CERCLIS database of contaminated sites. Therefore, Alternative 1 could create new impacts related to air quality and hazards and hazardous materials compared to the Project.
Alternatives	3-14	Please revise Figure 3-1 to correct the numbers of new and replaced poles in the white boxes contained in Figure 3-1 to correctly reflect the scope of anticipated pole replacement and removal activities associated with Alternative 1.	[Please revise the text accordingly.]

A-1.72

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A-1.74

2-68

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Environmental	4-1	Under the heading Introduction to Environmental Analysis , regarding the second bullet point, the mileage referenced for the source line is incorrect and should be updated.	Installation of two <u>one</u> approximately 3-mile long <u>and one approximately 9-mile long</u> 66 kV subtransmission source lines segments to connect the Falcon Ridge Substation to the existing Alder and Etiwanda Substation, respectively.
Environmental	4-3	Under the heading Applicant Proposed Measures , as previously requested (Executive Summary) please update the language for APM-BIO-2.	Please update language for APM-BIO-2
Aesthetics	4.1-6	Under the heading Proposed Falcon Ridge Substation , the text explains that the substation site’s visual quality is representative of vacant and agricultural lands in the study area. The substation site has no agricultural uses on site and such a statement could be misleading for other resource analysis, therefore it is suggested that the sentence be revised.	The visual quality of the site is representative and characteristic of vacant and agricultural land in the study area.
Aesthetics	4.1-6	Under the heading Proposed Falcon Ridge Substation , it explains surface terrain is characterized undeveloped agricultural and open space land.	Surface terrain is characterized by undeveloped agricultural and open space land covered with grass and brush (see Figure 4.1-2a, Photo A).
Aesthetics	4.1-12	Under the heading City of San Bernardino County General Plan , the following statement should be clarified: “The following goals and policies identified in the San Bernardino County General Plan are relevant to the Project...”	The following <u>non-binding</u> goals and policies identified in the San Bernardino County General Plan are <u>would otherwise be</u> relevant to the Project (San Bernardino County, 2007):
Aesthetics	4.1-12	Under the heading City of Fontana General Plan , for the same reasons explained above the following statement should be clarified: “The following City of Fontana General Plan goals and policies are relevant to the Project...”	The following City of Fontana General Plan <u>non-binding</u> goals and policies are <u>would otherwise be</u> relevant to the Project (City of Fontana, 2003):

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A-1.78

A-1.79

A-1.80

2-69

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Aesthetics	4.1-13	Under the heading City of Rialto General Plan , for the same reasons explained above the following statement should be clarified: “The following City of Rialto General Plan goal and policy are relevant to the Project...”	The following City of Rialto General Plan <u>non-binding</u> goal and policy are <u>would otherwise be</u> relevant to the Project (City of Rialto, 2010):
Aesthetics	4.1-13	Under the heading City of Rancho Cucamonga General Plan , for the same reasons explained above the following statement should be clarified: “The following City of Rancho Cucamonga General Plan policies are relevant to the Project...”	The following City of Rancho Cucamonga General Plan <u>non-binding</u> policies are <u>would otherwise be</u> relevant to the Project (City of Rancho Cucamonga, 2010):
Aesthetics	4.1-25	Under the heading 4.1.4 Impacts Analysis , as noted elsewhere in the DEIR, CPUC General Order 131-D explains that local land use regulations would not apply to the Project. Local land use policies that describe local scenic preferences are preempted by the regulatory authority of the CPUC. As a result, local designations of local view corridors or scenic gateways do not qualify as scenic vistas or state scenic highways which are the triggers for CEQA analysis. Because scenic vistas are not located in the study area, the Project would have no impact on scenic vistas, under CEQA criterion a).	Impact 4.1-1: The project would have an adverse effect on a scenic vista. Significant Unavoidable No Impact
Aesthetics	4.1-26	Under the heading 4.1.4 Impacts Analysis (Sierra Avenue) , please clarify the location of the proposed Etiwanda Subtransmission Source Line Route.	Although not visible in the simulation, from this KOP viewers would also see the Etiwanda Subtransmission Source Line Route as it crossed Sierra Avenue and headed west within <u>adjacent to</u> existing ROW.

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2-70

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-71

Section	Page	Comment	Suggested Revision
Aesthetics	4.1-28	Under the heading 4.1.4 Impacts Analysis (Foothill Boulevard, Baseline Avenue, and Highland Avenue) , please revise the paragraph to account for a more representative description of all existing elements in the area on and around South Highland Avenue. Additionally, regarding the trees referenced in this description it is suggested that a footnote be added to explain that tree trimming and/or removal may be necessary in order to maintain required safe electrical clearances.	As seen from the simulation, to viewers on South Highland Avenue driving East, the Project would appear against a backdrop of trees, open space, street lights, a distribution line on wood poles, and the backs of residential homes partially screened by a block wall in the foreground and middleground, and distant mountains, open space, and sky in the background. Viewers on South Highland Avenue driving West would have similar views, with the addition of the I-210 freeway and 500 kV lattice steel towers in the middleground view.
Aesthetics	4.1-29	As noted above under the heading 4.1.4 Impacts Analysis (Foothill Boulevard, Baseline Avenue, and Highland Avenue) , please revise the discussion regarding the conclusion of analysis under CEQA criterion a) with respect to aesthetics on South Highland Avenue to reflect that South Highland Avenue is not a scenic vista and therefore there would be no impact under CEQA criterion a). To the extent that the analysis continues to consider impacts along South Highland Avenue under the other CEQA criteria, please also change references to significant and unavoidable conclusions to less than significant. Such conclusions are located at page 4.1-25, page 4.1-32, and page 4.1-34.	Despite Given the limited duration of time that a motorist would view the Project <u>and site-specific circumstances, such as the presence of other man-made features and infrastructure elements in the area, which include an elevated freeway, lattice towers and distribution lines, and implementation of Mitigation Measure 4.1-1, impacts would be less than significant with mitigation, and even with implementation of Mitigation Measure 4.1-1, impacts would be significant and unavoidable.</u> Mitigation Measure 4.1-1: SCE and/or its contractors shall use subtransmission line conductors that are non-specular and non-reflective and insulators that are non-reflective and non-refractive. Significance after Mitigation: <u>Less than significant with mitigation (Class II)</u> Significant and unavoidable (Class I).
Aesthetics	4.1-31	Under the heading Impact 4.1-4 , it should be clarified that the upgrades being referenced are specific to telecommunications equipment.	“ <u>All telecommunication equipment</u> upgrades at the existing substations would occur within the existing MEER <u>or within existing structures</u> ; therefore, no additional ground disturbance is associated with the proposed telecommunications work.”
Agriculture	4.2-2	Under the heading California Farmland Mapping and Monitoring Program , the definition of Prime Farmland should be updated to include additional language relevant to the definition.	[Please include the following sentence at the end of the existing definition:] <u>“Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.”</u>

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FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Agriculture	4.2-2	Under the heading California Farmland Mapping and Monitoring Program , the definition of Unique Farmland should be updated to include additional language relevant to the definition.	[Please include the following sentence at the end of the existing definition:] <u>“Land must have been cropped at some time during the four years prior to the mapping date.”</u>
Agriculture	4.2-2	Under the heading California Farmland Mapping and Monitoring Program , the definition of Farmland of Statewide Importance should be updated to include additional language relevant to the definition.	[Please include the following sentence at the end of the existing definition:] <u>“Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.”</u>
Agriculture	4.2-5	Under the heading San Bernardino County , although the text in the above paragraph explains that the goals and policies from the general plan are not applicable, it should be further clarified in the following statement as well: “The following policies contained within these elements are relevant to...”	The San Bernardino County General Plan Conservation, Open Space, and Economic Development elements govern the land use and agricultural resources of the county. The following <u>non-binding</u> policies contained within these elements are <u>would otherwise be</u> relevant to agricultural resources (San Bernardino County, 2007):
Agriculture	4.2-6	Under the heading City of Rancho Cucamonga , for the same reasons explained above the following statement should be clarified: “The following policies contained within the Land Use and Resource Conservation elements of the City of Rancho Cucamonga General Plan are relevant to...”	The following <u>non-binding</u> policies contained within the Land Use and Resource Conservation elements of the City of Rancho Cucamonga General Plan <u>would otherwise be</u> are relevant to agricultural resources (City of Rancho Cucamonga, 2010):

A-1.89

A-1.90

A-1.91

A-1.92

2-72

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision																								
Air Quality	4.3-9	Under the heading California’s Diesel Risk Reduction Plan and Diesel Fuel Regulations , second paragraph, please add the exemptions listed under Section 2449(d)(2) of the rule.	<p>CARB has also adopted a regulation for in-use off-road diesel vehicles that is designed to reduce emissions from diesel-powered construction and mining vehicles by imposing idling limitations on owners, operators, renters, or lessees of off-road diesel vehicles. The regulation requires an operator of applicable off-road vehicles (self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on-road) to limit idling to no more than 5 minutes. <u>However, the idling limit does not apply to the following activities:</u></p> <ol style="list-style-type: none"> <u>1. idling when queuing.</u> <u>2. idling to verify that the vehicle is in safe operating condition.</u> <u>3. idling for testing, servicing, repairing or diagnostic purposes.</u> <u>4. idling necessary to accomplish work for which the vehicle was designed (such as operating a crane).</u> <u>5. idling required to bring the machine system to operating temperature, and</u> <u>6. idling necessary to ensure safe operation of the vehicle.</u> 																								
Air Quality	4.3-10	Regarding Table 4.3-3 , according to page 403-13 of SCAQMD Rule 403 (http://www.aqmd.gov/rules/reg/reg04/r403.pdf), the constructor is only required to select one of the three available BACMs to control fugitive dust from clearing forms. Accordingly, please add the word “or” in between 03-1, 03-2, and 03-3 (clearing forms).	<p align="center">TABLE 4.3-3 SCAQMD FUGITIVE DUST BACM FOR ALL CONSTRUCTION ACTIVITY SOURCES</p> <table border="1"> <thead> <tr> <th>Source Category</th> <th>No.</th> <th>Control Measure</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Backfilling</td> <td>01-1</td> <td>Stabilize backfill material when not actively handling.</td> </tr> <tr> <td>01-2</td> <td>Stabilize backfill material during handling.</td> </tr> <tr> <td>01-3</td> <td>Stabilize soil at completion of activity.</td> </tr> <tr> <td rowspan="3">Clearing and Grubbing</td> <td>02-1</td> <td>Maintain stability of soil through pre-watering of site prior to clearing and grubbing.</td> </tr> <tr> <td>02-2</td> <td>Stabilize soil during clearing and grubbing activities.</td> </tr> <tr> <td>02-3</td> <td>Stabilize soil immediately after clearing and grubbing activities.</td> </tr> <tr> <td rowspan="3">Clearing forms</td> <td>03-1</td> <td>Use water spray to clear forms. or</td> </tr> <tr> <td>03-2</td> <td>Use sweeping and water spray to clear forms. or</td> </tr> <tr> <td>03-3</td> <td>Use vacuum system to clear forms.</td> </tr> </tbody> </table>	Source Category	No.	Control Measure	Backfilling	01-1	Stabilize backfill material when not actively handling.	01-2	Stabilize backfill material during handling.	01-3	Stabilize soil at completion of activity.	Clearing and Grubbing	02-1	Maintain stability of soil through pre-watering of site prior to clearing and grubbing.	02-2	Stabilize soil during clearing and grubbing activities.	02-3	Stabilize soil immediately after clearing and grubbing activities.	Clearing forms	03-1	Use water spray to clear forms. or	03-2	Use sweeping and water spray to clear forms. or	03-3	Use vacuum system to clear forms.
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Air Quality	4.3-11	Under the heading Local , clarification about the local land use regulations should be included in the following sentence:	<p>CPUC General Order No. 131-D explains that local land use regulations would not apply to the Project. However, for information purposes, the following <u>non-binding</u> policies identified in the San Bernardino County, City of Fontana, City of Rialto, and City of Rancho Cucamonga general plans would otherwise be relevant to the Project.</p>																								

A-1.93

A-1.94

A-1.95

2-73

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-74

Section	Page	Comment	Suggested Revision
Air Quality	4.3-17	For Mitigation Measure 4.3-1a , the requirement for submittal of Plan to CPUC is vague; suggested language for clarification is presented. In addition, the reductions in NOx and PM10 should be compared to the unmitigated emissions amounts listed in the DEIR as opposed to potentially changing CARB fleet averages in order to provide a constant basis for comparison.	For diesel-fueled off-road construction equipment of more than 50 horsepower and on-road diesel fueled vehicles , SCE shall ensure achievement of a Project-wide fleet-average 20 percent NOx reduction and 45 percent PM10 exhaust reduction compared to the most recent CARB fleet average <u>estimated unmitigated emissions, as presented in this DEIR.</u> An Exhaust Emissions Control Plan to achieve these reductions 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. Acceptable options for reducing emissions include the use of late newer model <u>meeting USEPA Tier 3 standards (or better), and a recordkeeping protocol demonstrating compliance with the average reductions,</u> low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and or/other options as such become available. <u>If compliant rental equipment cannot reasonably be obtained to reduce NOx or PM10 emissions in accordance with the Exhaust Emissions Control Plan, documentation shall be provided from two local rental companies stating that the rental company does not have the required diesel-fueled off-road construction equipment or that the vehicle is a specialized vehicle that is not available to rent.</u>
Air Quality	4.3-17	Under the heading Significance after Mitigation , 1 st paragraph, 2 nd sentence includes an incorrect reference to BAAQMD, which should be changed to SCAQMD.	As noted above, implementation of the BAAQMD-SCAQMD fugitive dust BACMs have been factored into the emission estimates presented in Table 4.3-6; therefore, further reductions in PM10 emissions through implementation of Mitigation Measure 4.3-1b (Fugitive Dust Control Plan)
Air Quality	4.3-21	Under Impact 4.3-5 , it states there would be no long-term mobile or stationary sources of DPM emissions. Please revise the sentence to acknowledge that, during operation and maintenance of the Project, a very small number of diesel operated vehicles may occasionally be used, however the small amount of diesel emissions from those vehicles would not contribute substantially to a degradation of regional air quality standards.	There would be no long-term mobile or stationary sources of DPM emissions associated with operation and maintenance of the Project <u>would be negligible and not contribute to regional air quality violations.</u>
Air Quality	4.3-22	Under the heading Alternative 1: Lowell Street Realignment Alternative , the analysis states that emissions under Alternative 1 would be reduced by approximately 16 percent, however no explanation is given as to why. Please explain what the 16 percent reduction is based upon.	[Please revise the text accordingly.]

A-1.96

A-1.97

A-1.98

A-1.99

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Air Quality	4.3-22	<p>Under the heading 4.3.5 Alternatives, Alternative 1 fails to address the potential to disturb contaminated soil and, therefore, generate emissions of Toxic Air Contaminants (TAC). Such an analysis should be incorporated to ensure that significance criterion d) is adequately addressed for Alternative 1. The disruption of contaminated soil is of concern for both construction and operation of the Project. Specifically, the BF Goodrich Superfund Site is known to have soil and groundwater primarily contaminated with trichloroethylene and tetrachloroethene which are carcinogens that have been identified by the State of California as a TAC. Thus, Alternative 1 would potentially generate TACs exposing sensitive receptors to harmful pollutant concentrations. Based on the reasoning provided above, Alternative 1 would not be considered environmentally superior to the Proposed Project.</p> <p>Please also see the accompanying cover letter prepared by SCE.</p>	<p>[Please revise the text accordingly.]</p>
Biology	4.4-28	<p>Under the heading Local, although the text in the above paragraph explains that the local land use regulations are not applicable, should be further clarified in the text as follows.</p>	<p>CPUC General Order No. 131-D explains that local land use regulations would not apply to the Project. However, CPUC staff considered the following local policies to inform the significance determination related to the protection of biological resources in the study area. <u>For informational purposes, the following non-binding land use regulations would otherwise be relevant to the project and alternatives.</u></p>

A-1.100

A-1.101

2-75

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Biology	4.4-31	<p>APM-BIO-02 identifies that SCE will create a restoration program off-site for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub and annual grassland/disturbed Riversidean alluvial fan sage scrub. SCE would like to mitigate for these permanent impacts by paying into a local conservation bank such as the Cajon Creek Conservation Bank. SCE initially planned to mitigate near the Proposed Project area but any habitat improvements in this area would not fit into the City’s general plan which has the majority of undeveloped land zoned for residential and light industrial. Habitat purchased and improved locally by this mitigation measure may become isolated by future development and have little biological value for many species in the region. Payment of mitigation fees to a local conservation bank will help to improve or purchase contiguous habitat in areas of high biological value.</p>	<p>...The site shall be monitored and maintained for a suitable number of years to ensure successful establishment of Riversidean alluvial fan sage scrub habitat within the restored and created areas, as determined by the resource agencies.</p> <p><u>In lieu of developing an offsite restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition and habitat types present are comparable to impacted habitat at the Proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable, local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.</u></p>
Biology	4.4-35	<p>Regarding Mitigation Measure 4.4-2, additional clarification regarding potential minimization of impacts to Los Angeles pocket mouse should be included in the mitigation measures.</p>	<p>Mitigation Measure 4.4-2: SCE and/or its contractors shall avoid impacts to occupied Los Angeles pocket mouse habitat to the maximum extent feasible in the final Project design. SCE shall define Los Angeles pocket mouse habitat as “off limits” in construction plans and specifications. The presence of a Biological Monitor during Project construction would further ensure that any potential impacts to special-status wildlife species are avoided and minimized. <u>Minimization could include SCE paying mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition and habitat types present are comparable to impacted habitat at the Proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable, local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.</u></p>

A-1.102

A-1.103

2-76

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Biology	4.4-37	Impact 4.4-5 states that proposed construction at the existing Etiwanda Substation would not impact riparian habitat. However, based on the results of Biological Technical Report, the underground subtransmission line coming out of Etiwanda substation may potentially temporarily impact a small amount of disturbed mule fat scrub and a small jurisdictional drainage.	Proposed construction at the existing Etiwanda Substation would not impact riparian habitat or other sensitive natural communities. <u>Construction of the subtransmission line from existing Etiwanda Substation would temporarily impact a small portion of disturbed mulefat scrub, a state protected vegetation community.</u>
Biology	4.4-37 & 38	Regarding the analysis for Impact 4.4-6 , additional information should be included to explain the infeasibility of avoiding jurisdictional features at Etiwanda Substation.	<u>Due to engineering restrictions and safety requirements regarding electrical clearances from adjacent power lines,</u> C construction at the existing Etiwanda Substation would temporarily impact two features totaling about 0.004 acre (180 sq. ft.) of waters of the U.S. and about 0.006 acre (260 sq. ft.) of waters of the state within the existing Etiwanda Substation (SCE, 2010, pg. 4.4-35; BonTerra, 2010e). <u>Avoidance of these features would not be feasible.</u> These features appear to be channels excavated in dry land that do not support wetland vegetation or soils; however, both convey urban runoff flows to Etiwanda Creek and meet federal and/or state criterion as jurisdictional waters.
Cultural Resources	4.5-6 & 4.5-7	When the term “relocated” is used for the first time in the cultural resources section (in the second line of page 4.5-7), please add a footnote to clarify that the term relocation does not refer to moving a cultural resource, but rather refers to the subsequent verification of a previously identified cultural resource.	[Please revise the text accordingly.]
Cultural Resources	4.5-22	Regarding Mitigation Measure 4.5-3 , please add specific language referring to the SCE archaeologist contacting the coroner and not simply SCE. This ensures proper identification and unnecessary delays should non-human remains be found.	If human remains are uncovered during Project construction, SCE and/or its contractor shall immediately halt all work <u>in the immediate vicinity, and SCE’s archaeologist or cultural resources consultant shall</u> contact the county coroner to evaluate the remains, a...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 the SCE <u>archaeologist</u> and/or its <u>cultural resource</u> contractor has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely <u>descendants</u> regarding their recommendations...

A-1.104

A-1.105

A-1.106

A-1.107

2-77

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Geology & Soils	4.7-12	Under the heading San Bernardino County , clarification regarding the applicability of the following sentence should be included: “The following goals and policies identified in the San Bernardino County General Plan are relevant to the Project (San Bernardino County, 2007):”	The following <u>non-binding</u> goals and policies identified in the San Bernardino County General Plan are <u>would otherwise be</u> relevant to the Project (San Bernardino County, 2007):
Geology & Soils	4.7-12	Under the heading City of Fontana , clarification regarding the applicability of the following sentence should be included: “The following City of Fontana General Plan goals and policies are relevant to the Project (City of Fontana, 2003):”	The following City of Fontana General Plan <u>non-binding</u> goals and policies are <u>would otherwise be</u> relevant to the Project (City of Fontana, 2003):
Geology & Soils	4.7-13	Under the heading City of Rialto , clarification regarding the applicability of the following sentence should be included: “The following City of Rialto General Plan goal and policy are relevant to the Project (City of Rialto, 2010):”	The following City of Rialto General Plan <u>non-binding</u> goal and policy are <u>would otherwise be</u> relevant to the Project (City of Rialto, 2010):
Geology & Soils	4.7-13	Under the heading City of Rancho Cucamonga , clarification regarding the applicability of the following sentence should be included: “The following City of Rancho Cucamonga General Plan policies are relevant to the Project (City of Rancho Cucamonga, 2010):”	The following City of Rancho Cucamonga General Plan <u>non-binding</u> policies are <u>would otherwise be</u> relevant to the Project (City of Rancho Cucamonga, 2010):

A-1.108

A-1.109

A-1.110

A-1.111

2-78

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-79

Section	Page	Comment	Suggested Revision
GHG	4.8-6	Under the heading 4.8.4 Impacts Analysis (Approach to Analysis) , paragraph one states that “The SCAQMD has adopted an operational significance threshold of 10,000 metric tons CO ₂ e per year for stationary/industrial sources.” It should be noted that this threshold is considered Draft and Interim Guidance and it is recommended that this is clarified in the text.	Please revise as follows: “This analysis uses an approach for the determination of significance of GHG emissions based on the <u>tiered decision tree approach recommended in the South Coast Air Quality Management District (SCAQMD) Interim CEQA GHG Significance Threshold Draft Guidance Document</u> , which was adopted on December 5, 2008. The SCAQMD has proposed <u>adopted</u> an operational <u>screening</u> significance threshold of 10,000 metric tons CO ₂ e per year for stationary/industrial sources (SCAQMD 2008). The SCAQMD’s adopted GHG significance threshold is intended for long-term operational GHG emissions. However, the SCAQMD has developed guidance for the determination of significance of GHG construction emissions that recommends that total emissions from construction be amortized over 30 years and added to operational emissions and then compared to the applicable significance threshold (SCAQMD 2008). This analysis of the Project applies SCAQMD’s guidance with regard to assessment of construction <u>and operation</u> -related GHG emissions.
Hazards	4.9-2	Under the heading Existing Environment (Potential Presence of Hazardous Materials in Soil and Groundwater) , regarding the BF Goodrich Superfund Site the Alternative Source Line route is not adjacent to the site but located within the site as seen on Figure 4.9-1 and in the Appendices.	This site is located approximately 0.75 mile east of the proposed Falcon Ridge Substation, 0.9 mile north of the proposed Alder Subtransmission Source Line Route, and adjacent to <u>within</u> the Alternative Source Line Route.
Hazards	4.9-5	Under the heading Existing Environment (Wood Treatment Products) , based on the edits provided in the Project Description the number of poles removed needs to be updated.	The Project would remove 28-37 existing wood poles.
Hazards	4.9-9	Under the heading Existing Environment (Schools) , please update the number of preschools and day care centers to five.	Four Five public or private preschool and day-care centers were identified within 0.25 mile of the Project (SCE, 2010):
Hazards	4.9-13	Under the heading Hazardous Materials Emergency Response , the State Office of Emergency Services has changed its name to California Emergency Management Agency.	The plan is administered by the State Office of Emergency Services (OES) <u>California Emergency Management Agency (Cal-EMA)</u> . The (Cal-EMA) <u>OES</u> coordinates the responses of other agencies, including the USEPA, CHP, CDFG, the RWQCBs, the local air districts (in this case, the SCAQMD), and local agencies.

A-1.112

A-1.113

A-1.114

A-1.115

A-1.116

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Hazards	4.9-18	Under the heading Impact 4.9-1 (Construction) , SWPPP coverage is not obtained from the Santa Ana RWQCB. Rather, the application is submitted to the State Water Resources Control Board.	Among other things, the WEAP would provide instructions for implementation of the Project SWPPP, including site-specific BMPs required by the RWQCB through its review and approval of the SWPPP, the location of the MSDS, and notification procedures in the event of a spill, leak, or discovery of soil contamination.
Hazards	4.9-20	Under the heading Impact 4.9-1 (Operation and Maintenance) , it states that an SPCC plan will be prepared since the quantity of hazardous materials would exceed 1,320 gallons on site. However, per 40 C.F.R. Parts 110 and 112, an SPCC plan is required when threshold quantities of hazardous materials are exceeded and there is a reasonable expectation to discharge into a navigable waterway.	“If Because the quantity of oil stored would exceeds 1,320 gallons and there is a <u>reasonable expectation to discharge into a navigable waterway</u> , a SPCC Plan describing spill prevention measures would be required.
Hazards	4.9-22	Under the heading Impact 4.9-3 (Construction) , SWPPP coverage is not obtained from the Santa Ana RWQCB. Rather, the application is submitted to the State Water Resources Control Board.	Standard construction water quality BMPs required by the RWQCB through its review and approval of the SWPPP include measures for the safe handling and storage of hazardous materials used during construction to prevent a release and methods to contain any such release if it should occur.
Hazards	4.9-26	Regarding Mitigation Measure 4.9-6 , the language included in the bullet points may not be appropriate given the local conditions at the Project site. Instead, the mitigation measure should be revised to incorporate site specific recommendations provided by SBCFD. For example, the first bullet point discussing fire fighting apparatus may not be suited for this specific site location. Coordination with SBCFD would provide the most specific and applicable requirements such as water amounts, proper equipment, etc. In addition, please also clarify that the training to be provided to the SCE personnel should be with respect to the use of fire fighting equipment in fighting small fires (as opposed to large fires that would be within the purview of emergency responders).	No Suggested Revision

A-1.117

A-1.118

A-1.119

A-1.120

2-80

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Hazards	4.9-27	<p>Under the heading Alternative 1: Lowell Street Realignment Alternative, regarding the BF Goodrich Superfund Site the Alternative Source Line route is not adjacent to the site but located within the site as seen on Figure 4.9-1 and in the Appendices. Additionally, Alternative 1 would be located on a site which is included on the list of Hazardous Materials sites compiled pursuant to government code Section 65962.5 and this information should be disclosed in this section of the document.</p> <p>Please see SCE’s accompanying cover letter.</p>	<p>The alternative alignment of the Alder Subtransmission Source Line and Fiber Optic Cable Route would border on three sides be located within the 160-acre contaminated area that is the subject of the B.F. Goodrich Superfund Site cleanup plan (Figure 4.9-1).</p> <p><u>B.F. Goodrich Superfund Site is on the list of Hazardous Materials site compiled pursuant to government code Section 65962.5.</u></p>
Hazards	4.9-27	<p>Under the heading Alternative 1: Lowell Street Realignment Alternative, the DEIR greatly understates the potential to encounter soil contamination during construction. Based on the final BF Goodrich site investigation, Soil Boring and Vapor Probe Installation Report prepared by CH2MHILL (November 2010), there is soil contamination at depths of 6 to 12 feet in the vicinity of the existing Rialto Concrete Products, Inc. operation, located adjacent to Lowell Street. For this reason, it is not unlikely that contaminated soil will be encountered during construction of Alternative 1 and the potential impacts associated with the same must be analyzed in greater detail. Based on the reasoning provided above, Alternative 1 would not be considered environmentally superior to the Proposed Project.</p> <p>Please see SCE’s accompanying cover letter.</p>	<p>[Please revise the text accordingly.]</p>

A-1.121

A-1.122

2-81

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Hazards	4.9-27	<p>Under the heading Alternative 1: Lowell Street Realignment Alternative, the DEIR fails to mention the current state of the cleanup site, and this is considered to be problematic for the following reasons:</p> <ul style="list-style-type: none"> • There is insufficient information to determine if Alternative 1 would conflict with current and future remediation activities (e.g. pole locations could conflict with monitoring wells and/or other underground devices). • There is insufficient information to determine the extent of the mitigation required for Alternative 1 and, therefore, whether such mitigation is feasible and/or will reduce all impacts to less than significant level. • There is insufficient information to determine future liability associated with contaminated soils and potential clean up responsibilities. <p>Please see SCE’s accompanying cover letter.</p>	<p align="center">[Please revise the text accordingly.]</p>
Hydrology	4.10-11	<p>Regarding the Construction General Permit, Order 2009-0009-DWQ was amended in 2010 when formally referenced it should be referred to by its formal name “2009-0009-DWQ” as amended by 2010-0014-DWQ in this section and subsequent sections of the DEIR.</p>	<p>Construction General Permit (SWRCB Order <u>2009-0009-DWQ as amended by 2010-0014-DWQ</u>2009-09-DWQ).</p>

A-1.123

A-1.124

2-82

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-83

Section	Page	Comment	Suggested Revision
Hydrology	4.10-12 & 4.10-18	Under the heading Construction General Permit , please correctly identify the term used to describe Order 2009-0009.3	<p>The Project would disturb more than 1.0 acre of soil and would thus be subject to the provisions and requirements of the <u>Construction General Permit</u>. SCE would submit an NOI to the SWRCB and obtain coverage under, and comply with, the <u>Construction General Permit</u>. As summarized previously, the preparation of a SWPPP would be required in accordance with the <u>Construction General Permit</u>. The SWPPP would include, but not be limited to, relevant measures, conditions, and obligations which would reduce or eliminate the impacts of construction activities on stormwater and receiving water quality and quantity. The <u>Construction General Permit</u> also contains requirements for the post-construction period, though implementation of a WQMP—if required under the San Bernardino County MS4 Permit and approved by the copermitttee with jurisdictional authority—may constitute compliance with the <u>Construction General Permit</u> post-construction requirements.</p> <p>...</p> <p>Because the Project would be greater than 1 acre in size, SCE would be required to submit a NOI to the Santa Ana SWRCB in order to obtain approval to carry out construction activities under the <u>Construction General Permit</u>.</p>
Hydrology	4.10-18	Under the heading Impact 4.9-1 , for clarification, multiple SWPPPs can be prepared for the Proposed Project.	<p>Permit requirements would include the preparation of a SWPPP <u>or multiple SWPPPs</u>, implementation and monitoring of BMPs, implementation of best available technology (BAT) for toxic and non-conventional pollutants, implementation of best conventional technology (BCT) for conventional pollutants, and periodic submittal of performance summaries and reports to the Santa Ana RWQCB. The SWPPP(s) would <u>apply to the Project as a whole and would</u> include reference to the major construction areas, such as the proposed Falcon Ridge Substation, materials staging areas and underground work associated with telecommunications facilities and relocation of existing transmission poles.</p>
Hydrology	4.10-18	Under the heading Impact 4.9-1 , for clarification, reports are submitted via the State’s electronic database, known as SMARTS, and no longer directly to the Regional Water Quality Control Boards.	<p>Permit requirements would include the preparation of a SWPPP, implementation and monitoring of BMPs, implementation of best available technology (BAT) for toxic and non-conventional pollutants, implementation of best conventional technology (BCT) for conventional pollutants, and periodic submittal of performance summaries and reports <u>to the Santa Ana RWQCB.</u></p>

A-1.125

A-1.126

A-1.127

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-84

Section	Page	Comment	Suggested Revision
Hydrology	4.10-19	Under the heading Impact 4.9-1 , it states that a SPCC plan will be prepared since the quantity of hazardous materials would exceed 1,320 gallons on site. However, per 40 C.F.R. Parts 110 and 112, a SPCC plan is required when threshold quantities of hazardous materials are exceeded and there is a reasonable expectation to discharge into a navigable waterway.	With respect to adverse water quality impact due to the presence of hazardous materials, based on if the anticipated volume of mineral oil in use at the site exceeds being in excess of 1,320 gallons and there is a reasonable expectation to discharge into a <u>navigable waterway</u> , a Spill Prevention and Control Countermeasures (SPCC) Plan would be required (40 C.F.R. Parts 112.1- 112.7).
Hydrology	4.10-21	Regarding the analysis for Alternative 1: Lowell Street Realignment Alternative , it should be noted that based on the high potential to encounter contaminated soils during construction there is an incremental increase associated with significance criterion a) that must be disclosed and acknowledged. Based on the reasoning provided above, Alternative 1 would not be considered environmentally superior to the Proposed Project. Please see SCE’s accompanying cover letter.	[Please revise the text accordingly.]
Land Use	4.11-2	Under the heading Regulatory Setting (Local) , clarification about the local land use designations should be included in the following sentence: “For information purposes, the following non-binding land use designations for San Bernardino County and the cities of Fontana, Rialto, and Rancho Cucamonga related to land use and planning are described below.”	<u>For information purposes, the following non-binding land use designations for San Bernardino County and the cities of Fontana, Rialto, and Rancho Cucamonga related to land use and planning are described below.</u>
Land Use & Planning	4.11-4	Under the heading City of Fontana (General Plan) , please revise the description of where the Etiwanda Subtransmission Source Line route would be located outside SCE’s existing ROW.	The subtransmission line route would be within the existing SCE ROW, delineated as P-UC on the city’s land use map and not included in the specific plan areas, with the exception of: <u>1) the portion that would divert from SCE’s ROW and extend east parallel to South Highland Avenue to San Sevaine Road, then extend north paralleling San Sevaine Road and spanning the 210 Freeway until reentering SCE’s ROW; and 2) approximately 1/2 mile between Cypress Street and the proposed Falcon Ridge Substation location through an approved Specific Plan area.</u>

A-1.128

A-1.129

A-1.130

A-1.131

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Land Use & Planning	4.11-11	Under the heading Impact 4.11-1 , it should be clarified that the portions of the subtransmission route within the City of Fontana would be located primarily within existing SCE ROW.	...the portions of the route that would traverse these communities would be <u>primarily</u> within the existing SCE ROW and these facilities would not restrict access or constitute a physical barrier to these communities.
Mineral Resources	4.12-4	Under the heading Regulatory Setting (Local) , clarification about the local policies should be included in the following sentence: “For information purposes, the following goals and policies included in the general plans for San Bernardino County and the cities of Fontana, Rialto, and Rancho Cucamonga related to mineral resources are described below.”	For information purposes, the following <u>non-binding</u> goals and policies included in the general plans for San Bernardino County and the cities of Fontana, Rialto, and Rancho Cucamonga related to mineral resources are described below.
Noise	4.13-7	Under the heading Regulatory Context , the applicability of land use policies should be clarified.	However, CPUC staff considered the following <u>non-binding</u> policies identified in the general plans for San Bernardino County and the cities of Fontana, Rialto, and Rancho Cucamonga to inform the determination of significance thresholds for the study area.
Noise	4.13-7	Under the heading San Bernardino County General Plan , the applicability of land use policies should be clarified.	The San Bernardino County General Plan includes the following <u>non-binding</u> policies from the Noise Element(San Bernardino County, 2007a):
Noise	4.13-8	Under the heading Regulatory Context , please add a reference to the description of the San Bernardino County Code that discusses this code’s regulations governing stationary noise sources.	No Suggested Revision
Noise	4.13-8	Under the heading City of Fontana General Plan , the applicability of land use policies should be clarified.	The City of Fontana General Plan includes the following <u>non-binding</u> policy from the Noise Element (City of Fontana, 2003):
Noise	4.13-8	Under the heading City of Fontana Municipal Code , the applicability of local municipal codes should be clarified.	The City of Fontana regulates noise with Municipal Code Chapter 18, Article II, <i>Noise</i> . The <u>otherwise</u> relevant portion of this <u>non-binding</u> code, §18-63(b), describes the following prohibited noises:
Noise	4.13-8	Under the heading City of Rialto General Plan , the applicability of land use policies should be clarified.	The City of Rialto General Plan includes the following <u>non-binding</u> policy from the Safety and Noise Element (City of Rialto, 2010):

A-1.132

A-1.133

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A-1.138

A-1.139

2-85

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Noise	4.13-9	Under the heading City of Rialto Municipal Code , the applicability of local municipal codes should be clarified.	The City of Rialto regulates noise with Municipal Code Chapter 9.50, <i>Noise Control</i> . The <u>otherwise</u> relevant portions of this <u>non-binding</u> code are as follows (City of Rialto, 2008):
Noise	4.13-9	Under the heading, City of Rialto Municipal Code , the City of Rialto exempts SCE as a utility “subject to the regulatory jurisdiction of the California Public Utilities Commission” from noise and operational hours ordinances under §9.50.50(K) of the City’s municipal code.	<u>SCE’s project construction activities are exempt from the provisions of Chapter 9.50 of the City’s municipal code. As provided in that chapter:</u> §9.50.060, Exemptions. The following activities and noise sources shall be exempt from the provisions of this chapter: <u>K. Construction, operation, maintenance and repairs of equipment, apparatus or facilities of park and recreation departments, public work projects or essential public services and facilities, including trash collection and those of public utilities subject to the regulatory jurisdiction of the California Public Utilities Commission.</u> <u>L. Construction, repair, or excavation work performed pursuant to a valid written agreement with the city or any of its political subdivisions which agreement provides for noise mitigation measures.</u>
Noise	4.13-10	Under the heading City of Rancho Cucamonga General Plan , the applicability of land use policies should be clarified.	The City of Rancho Cucamonga General Plan includes the following <u>non-binding</u> policies from the Public Health and Safety Element (City of Rancho Cucamonga, 2010):
Noise	4.13-10	Under the heading City of Rancho Cucamonga Municipal Code , the applicability of local municipal codes should be clarified.	The City of Rancho Cucamonga regulates noise with Municipal Code Title 17, §17.02.120, <i>Noise Abatement</i> . The <u>otherwise</u> relevant portions of this <u>non-binding</u> code are as follows:
Noise	4.13-12	Under the heading 4.13.4 Impacts and Mitigation Measures (Approach to Analysis) , in the addition to the fact that construction activities would typically be allowed if they occur during the hours presented in Table 4.13-3, any work associated with the Falcon Ridge Project in the City of Rialto would also be exempt from otherwise applicable Noise Control regulations contained in Chapter 9.50 of the city’s Municipal Code as a utility project subject to the regulatory jurisdiction of the California Public Utilities Commission (See §9.50.50(K)).	<u>In addition to the fact that construction activities in unincorporated San Bernardino County and the cities of Fontana and Rialto are exempt from the noise regulation provisions in their codes if the construction activities occur during the hours presented in Table 4.13-3, it should also be noted that as a utility project subject to the regulatory jurisdiction of the California Public Utilities Commission, any work associated with the Falcon Ridge Project in the City of Rialto would also be exempt from otherwise applicable Noise Control regulations contained in Chapter 9.50 of the city’s Municipal Code. Construction activities in unincorporated San Bernardino County and the cities of Fontana and Rialto are exempt from the noise regulation provisions in their code if the construction activities occur during the hours presented in Table 4.13-3.</u>

A-1.140

A-1.141

A-1.142

A-1.143

A-1.144

2-86

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision																											
Noise	4.13-13	Regarding Table 4.13-3 , as a utility project subject to the regulatory jurisdiction of the California Public Utilities Commission, any work associated with the Falcon Ridge Project in the City of Rialto would also be exempt from otherwise applicable Noise Control regulations contained in Chapter 9.50 of the city's Municipal Code. Please add a footnote to the Table 4.13-3 to indicate that SCE project work activities are exempt from the permitted hours indicated in the table.	<p align="center">TABLE 4.13-3 LOCAL JURISDICTIONS-PERMITTED HOURS FOR CONSTRUCTION WORK</p> <table border="1"> <thead> <tr> <th rowspan="2">City/County</th> <th colspan="3">Permitted Hours</th> </tr> <tr> <th>Monday-Friday</th> <th>Saturday</th> <th>Sunday and Holidays</th> </tr> </thead> <tbody> <tr> <td>San Bernardino County</td> <td>7:00 a.m. - 7:00 p.m.</td> <td>7:00 a.m. - 7:00 p.m.</td> <td>None</td> </tr> <tr> <td>City of Fontana</td> <td>7:00 a.m. - 6:00 p.m.</td> <td>8:00 a.m. - 5:00 p.m.</td> <td>None</td> </tr> <tr> <td>City of Rialto (Oct.-Apr)**</td> <td>7:00 a.m. - 5:30 p.m.</td> <td>8:00 a.m. - 5:00 p.m.</td> <td>None</td> </tr> <tr> <td>City of Rialto (May-Sep) **</td> <td>6:00 a.m. - 7:00 p.m.</td> <td>8:00 a.m. - 5:00 p.m.</td> <td>None</td> </tr> <tr> <td>City of Rancho Cucamonga*</td> <td>6:30 a.m. - 8:00 p.m.</td> <td>6:30 a.m. - 8:00 p.m.</td> <td>None</td> </tr> </tbody> </table> <p>* Construction noise exposure shall not exceed 65 dB L₂₄, 70 dB L₁₆, 79 dB L₈, or 80 dB L_{max} at noise-sensitive property lines (e.g., residential property lines). SOURCES: San Bernardino County, 2007; City of Fontana, 2007; City of Rialto, 2008; and City of Rancho Cucamonga, 1983.</p> <p>** Although these hours regulations are applicable to construction work in general, please note that as a utility, all SCE utility project work activities are exempt from all timing requirements under City of Rialto's Municipal Code.</p> <p>Additional note: ** <u>Although these hours regulations are applicable to construction work in general, please note that as a utility, all SCE utility project work activities are exempt from all timing requirements under City of Rialto's Municipal Code.</u></p>	City/County	Permitted Hours			Monday-Friday	Saturday	Sunday and Holidays	San Bernardino County	7:00 a.m. - 7:00 p.m.	7:00 a.m. - 7:00 p.m.	None	City of Fontana	7:00 a.m. - 6:00 p.m.	8:00 a.m. - 5:00 p.m.	None	City of Rialto (Oct.-Apr)**	7:00 a.m. - 5:30 p.m.	8:00 a.m. - 5:00 p.m.	None	City of Rialto (May-Sep) **	6:00 a.m. - 7:00 p.m.	8:00 a.m. - 5:00 p.m.	None	City of Rancho Cucamonga*	6:30 a.m. - 8:00 p.m.	6:30 a.m. - 8:00 p.m.	None
City/County	Permitted Hours																													
	Monday-Friday	Saturday	Sunday and Holidays																											
San Bernardino County	7:00 a.m. - 7:00 p.m.	7:00 a.m. - 7:00 p.m.	None																											
City of Fontana	7:00 a.m. - 6:00 p.m.	8:00 a.m. - 5:00 p.m.	None																											
City of Rialto (Oct.-Apr)**	7:00 a.m. - 5:30 p.m.	8:00 a.m. - 5:00 p.m.	None																											
City of Rialto (May-Sep) **	6:00 a.m. - 7:00 p.m.	8:00 a.m. - 5:00 p.m.	None																											
City of Rancho Cucamonga*	6:30 a.m. - 8:00 p.m.	6:30 a.m. - 8:00 p.m.	None																											

A-1.145

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Noise	4.13-14	<p>Mitigation Measures 4.13-1 would not mitigate any significant impact under CEQA criterion a) for noise and should, therefore be deleted.</p> <p>In addition, there does not seem to be any conclusive benefits associated with this mitigation measure. As noted on page 4.13-15, “it is not possible to firmly substantiate that implementation of Mitigation Measure 4.13-1 would achieve noise reductions of more than 5 dBA.” Because 5 dBA is explained to be the typical change in noise level required for any noticeable change in human response, implementation of mitigation measures that would not achieve that noticeable change should not be implemented.</p> <p>The analysis also does not consider potential noise impacts associated with the implementation of some aspects of the mitigation measures described in the DEIR. For example, Mitigation Measure 4.13-1 includes a provision stating that temporary noise barriers should be installed. However, installation of noise barriers may prove to be counterproductive if applied to work associated with 66 kV subtransmission lines. Most 66 kV line construction is of short duration, and installation and removal of the barriers could take longer and could produce as many or more impacts, including noise impacts, than the 66 kV work itself.</p>	<p style="text-align: center;">No Suggested Revision</p>

A-1.146

2-88

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-89

Section	Page	Comment	Suggested Revision
Noise	4.13-19	<p>Regarding Mitigation Measure 4.13-5, the measure does not specify noise level limits or standards of any sort in which SCE is trying to achieve. Other than the distance to a receptor, which does not necessarily equate to any particular sound measurement there is no way of determining compliance or when it is necessary.</p> <p>As noise impacts are based on noise levels and not solely on distance to a potential receptor, the determination of when and where this measure should be implemented should be based on factors other than simply distance. For example, the key consideration should be whether project related noise levels would represent an increase over ambient noise levels or a local standard by a particular amount. Therefore, mitigation measure 4-13.5 would not mitigate any significant impact under CEQA criterion d) for noise and should be deleted.</p>	Mitigation Measure 4.13-5 should be deleted.
Population & Housing	4.14-3	Under the heading Regulatory Setting (Southern California Association of Governments) , please revise the date to reflect that SCAG has prepared the next RHNA which covers the period from October 1, 2013 to September 30, 2021 (SCAG, November 2011).	...The most recently published RHNA covered the planning period of January 1, 2006 to June 30, 2014. Because of the requirements of Senate Bill (SB) 375, SCAG is preparing the next RHNA planning cycle which will cover January 1, 2011 <u>October 1, 2013</u> to September 30, 2021 (SCAG, 2011b).
Population & Housing	4.14-3	Under the heading San Bernardino County General Plan , please clarify the applicability of the provisions of that plan to the Project given GO 131-D.	The San Bernardino County General Plan contains the following <u>non-binding</u> goals and policies that are <u>would otherwise</u> be relevant to the Project and alternatives (San Bernardino County, 2007):
Population & Housing	4.14-4	Under the heading City of Fontana General Plan , please clarify the applicability of the provisions of that plan to the Project given GO 131-D.	The Public Facilities, Services & Infrastructure Element of the City of Fontana General Plan includes the following <u>non-binding</u> goals and policies that would <u>otherwise</u> be relevant to the Project and alternatives (City of Fontana, 2003):

A-1.147

A-1.148

A-1.149

A-1.150

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Population & Housing	4.14-4	Under the heading City of Rialto General Plan , please clarify the applicability of the provisions of that plan to the Project given GO 131-D.	The following City of Rialto General Plan <u>non-binding</u> goal and policy are <u>would otherwise be</u> relevant to the Project (City of Rialto, 2010):
Population & Housing	4.14-4	Under the heading City of Rancho Cucamonga General Plan , please clarify the applicability of the provisions of that plan to the Project given GO 131-D.	The following City of Rancho Cucamonga General Plan <u>non-binding</u> policies are <u>would otherwise be</u> relevant to the Project (City of Rancho Cucamonga, 2010):
Public Services	4.15-10	The following footnote provides data related to Riverside County, the Project area is located in San Bernardino County, therefore the data in the footnote should be revised. “In Riverside County in 2010, 242,985 households had children under the age of 18, and the total county population of children under the age of 18 was 594,588 (U.S. Census Bureau, 2010).”	[Please revise the text accordingly.]
Recreation	4.16-5	Under the heading County of San Bernardino General Plan , although the text in the above paragraph explains that the goals and policies from the general plan are not applicable, it should be further clarified in the following statement as well: “The Safety Element of the San Bernardino County General Plan contains the following policy related to recreation that would be relevant to the Project and alternatives (San Bernardino County, 2007):”	The Safety Element of the San Bernardino County General Plan contains the following <u>non-binding</u> policy related to recreation that would <u>otherwise be</u> relevant to the Project and alternatives (San Bernardino County, 2007):

A-1.151

A-1.152

A-1.153

A-1.154

2-90

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Recreation	4.16-6	Under the heading City of Fontana General Plan , although the text in the prior paragraph explains that the goals and policies from the general plan are not applicable, it should be further clarified in the following statement as well: “The City of Fontana General Plan includes the following goals and policies related to recreation that would be relevant to the Project and alternatives (City of Fontana, 2003).”	The City of Fontana General Plan includes the following <u>non-binding</u> goals and policies related to recreation that would <u>otherwise</u> be relevant to the Project and alternatives (City of Fontana, 2003):
Recreation	4.16-6	Under the heading City of Rialto General Plan , although the text in the prior paragraph explains that the goals and policies from the general plan are not applicable, it should be further clarified in the following statement as well: “The Circulation Chapter of the City of Rialto General Plan includes the following policy related to recreation that would be relevant to the Project and alternatives (City of Rialto, 2010).”	The Circulation Chapter of the City of Rialto General Plan includes the following <u>non-binding</u> policy related to recreation that would <u>otherwise</u> be relevant to the Project and alternatives (City of Rialto, 2010):
Recreation	4.16-6	Under the heading City of Rancho Cucamonga General Plan , although the text in the prior paragraph explains that the goals and policies from the general plan are not applicable, it should be further clarified in the following statement as well: “The Community Services Element of the City of Rancho Cucamonga General Plan includes the following policies related to recreation that would be relevant to the Project and alternatives (City of Rancho Cucamonga, 2010).”	The Community Services Element of the City of Rancho Cucamonga General Plan includes the following <u>non-binding</u> policies related to recreation that would <u>otherwise</u> be relevant to the Project and alternatives (City of Rancho Cucamonga, 2010):

A-1.155

A-1.156

A-1.157

2-91

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Recreation	4.16-8	<p>Regarding the analysis for Impact 4.16-1, the following assumption is not consistent with the information provided in Chapter 2.0 Project Description and needs to be revised:</p> <p>“Both the subtransmission line and fiber-optic cable would be strung along existing aboveground structures in these portions of the alignment, and no new wood poles, TSPs, or other structures would be constructed within these portions of the ROW. Therefore, no ground-disturbing construction activities would take place within these segments of the ROW, and Project construction would not contribute to or accelerate the substantial physical deterioration of these facilities, and this impact would be less than significant.”</p>	<p>Both the subtransmission line and fiber-optic cable would be strung along existing aboveground structures in these portions of the alignment, and no new wood poles, TSPs, or other structures would be constructed within these portions of the ROW. Therefore, no ground-disturbing construction activities would take place within these segments of the ROW. <u>New subtransmission poles and access roads would be located within these portions of the ROW. However, and Project construction of access roads and new poles would not contribute to or accelerate the substantial physical deterioration of these facilities, and this impact would be less than significant.</u></p>

A-1.158

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Recreation	4.16-8	<p>Regarding the analysis for Impact 4.16-1, the following discussion is not related to the CEQA criteria it is evaluating:</p> <p>“Project operation would have no effect with respect to the use or substantial deterioration of parks. Project maintenance would be infrequent, would not substantially increase above existing levels, and would be unlikely to result in closures of these pedestrian pathways and/or passive recreational areas. However, Project construction could affect pedestrians and park users at Fontana Park and Rosena Park East and West by resulting in temporary closures of pedestrian pathways and/or passive recreational areas within the ROW. Mitigation Measure 4.16-1 would ensure that recreationalists are aware of any possible pathway or park closures during Project construction activities.”</p> <p>The CEQA significance criteria requests an analysis be provided to determine if the Project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p> <p>The discussion as presented explains Project construction could affect usage patterns of park users, but such a discussion is not warranted in this section of the analysis and should be removed from the DEIR, as well as the associated Mitigation Measure 4.16-1. Please note that Mitigation Measure 4.17-1 already provides that SCE shall prepare and implement a traffic control plan that would, among other things, identify detours for pedestrians during Project construction.</p>	<p>“Project operation would have no effect with respect to the use or substantial deterioration of parks. Project maintenance would be infrequent, would not substantially increase above existing levels, and would be unlikely to result in closures of these pedestrian pathways and/or passive recreational areas. However, Project construction could affect pedestrians and park users at Fontana Park and Rosena Park East and West by resulting in temporary closures of pedestrian pathways and/or passive recreational areas within the ROW. Mitigation Measure 4.16-1 would ensure that recreationalists are aware of any possible pathway or park closures during Project construction activities.”</p> <p>Mitigation Measure 4.16-1: SCE shall coordinate with the City of Fontana Community Services Department to ensure that appropriate warning signs are posted alerting pedestrians and park users to pedestrian pathway and park closures and informing users about nearby alternative recreational resources, such as Koehler and North Fontana parks.</p> <p>[Please also revise the analysis to respond to the CEQA criteria regarding potential physical deterioration.]</p>

2-93

A-1.159

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Transportation & Traffic	4.17-1	Under the heading 4.17.1 Setting (Local Roadways) , it is suggested that the roadways associated with Alternative 1, be identified in this section, although as explained under the heading Alternative 1: Lowell Street Realignment Alternative (page 4.17-16) the alternative includes similar roadways to the Project.	[Please revise the text accordingly.]
Transportation & Traffic	4.17-4	Under the heading Regulatory Setting (Local) , clarification regarding the applicability of the following sentence should be included: “CPUC staff considered the following policies identified in the general plans for San Bernardino County and the cities of Fontana, Rialto, and Rancho Cucamonga to identify the adopted LOS standards for roadways potentially affected by the Project.”	CPUC staff considered the following <u>non-binding</u> policies identified in the general plans for San Bernardino County and the cities of Fontana, Rialto, and Rancho Cucamonga to identify the adopted LOS standards for roadways potentially affected by the Project.
Transportation & Traffic	4.17-4	Under the heading San Bernardino County , clarification regarding the applicability of the following sentence should be included: “The San Bernardino County General Plan contains goals, policies and implementation measures that would be relevant to Project...Relevant policies and programs to the Project are discussed below.”	The San Bernardino County General Plan contains <u>non-binding</u> goals, policies and implementation measures that would <u>otherwise</u> be relevant to Project... <u>Otherwise</u> r Relevant <u>non-binding</u> policies and programs to the Project are discussed below.
Transportation & Traffic	4.17-4	Under the heading San Bernardino County , clarification regarding the applicability of the following sentence should be included: “Relevant goals and policies to the Project are discussed below.”	<u>Otherwise</u> R relevant <u>non-binding</u> goals and policies to the Project are discussed below:

A-1.160

A-1.161

A-1.162

A-1.163

2-94

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Transportation & Traffic	4.17-5	Under the heading City of Fontana General Plan , clarification regarding the applicability of the following sentence should be included: “Specific goals and policies that would be relevant to the Project include the following:”	Specific <u>non-binding</u> goals and policies that <u>otherwise</u> would be relevant to the Project include the following:
Transportation & Traffic	4.17-6	Under the heading City of Rialto General Plan , clarification regarding the applicability of the following sentence should be included: “The following policies from the general plan would be relevant to the Project:”	The following <u>non-binding</u> policies from the general plan would <u>otherwise</u> be relevant to the Project:
Transportation & Traffic	4.17-8	Under the heading Construction (Related Vehicle Trips) , the following statement regarding local jurisdictions should be clarified: “As stated, construction of the proposed facilities would work simultaneously whenever possible; however, the estimated deployment and number of crew members would depend on local jurisdiction permitting, material availability, and construction scheduling.”	As stated, construction of the proposed facilities would work simultaneously whenever possible; however, the estimated deployment and number of crew members would depend on local jurisdiction <u>non-discretionary</u> permitting, material availability, and construction scheduling.
Transportation & Traffic	4.17-9	Under the heading Operation and Maintenance (Construction) , although not as common, some material deliveries have the potential to occur during peak hours.	It is expected that Project-generated truck trips, delivering materials and equipment, would <u>generally</u> occur during off-peak commute hours, would utilize dedicated truck routes within each jurisdiction, and would comply with all Caltrans permitting requirements when any truck loads are oversize.
Transportation & Traffic	4.17-16	Under the heading Alternative 1: Lowell Street Realignment Alternative , the text references implementation of Mitigation Measure 4.17-2, however no such mitigation measure exists in the document, therefore the text should be updated.	Therefore, Mitigation Measures 4.17-1 and 4.17-2 identified for the Project would also be required for this alternative.

A-1.164

A-1.165

A-1.166

A-1.167

A-1.168

2-95

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Utilities	4.18-8	Regarding the analysis for significance criterion c) under the heading 4.18.4 Impacts and Mitigation Measures , the following statements do not clearly reflect the components of the Project and should be revised: “Construction of the proposed subtransmission source line routes would span drainages, but SCE does not anticipate placing structures within drainages. The proposed telecommunications facilities and proposed distribution getaways would not add any new aboveground structures.”	Construction of the proposed subtransmission source line routes would span drainages, but SCE does not anticipate placing structures within drainages would require <u>construction activities be conducted in an existing drainage outside of Etiwanda Substation, as explained and analyzed in Chapter 4.4. Biological Resources.</u> The proposed telecommunications facilities and proposed distribution getaways would not add any new aboveground structures, <u>as the telecommunications facilities are proposed to be located on the new subtransmission poles.</u>
Utilities	4.18-9	Under the heading 4.18.4 Impacts and Mitigation Measures significance criterion d), please add language to state that construction would be approximately 12 months as the duration may change slightly depending on field conditions.	Construction related water use would be temporary (<u>approximately 12 months</u>), and water used during construction would be available from existing municipal water sources and would not affect the local water supply
Utilities	4.18-9	Based on the edits provided in the Project Description , it is suggested that the option for the permanent restroom with a self-contained waste disposal system be referenced in the analysis.	During Project operation, a portable chemical toilet would be placed within the substation perimeter wall for use by SCE personnel and maintenance contractors, and would be regularly maintained by an outside service company. <u>Additionally, another potential option could include a permanent restroom equipped with a self-contained waste disposal system installed within the substation perimeter near the entry gate.</u> Because the proposed Falcon Ridge Substation would be unstaffed and remotely operated, visits to the proposed Falcon Ridge Substation site would be limited to three to four times per month. If, at the time of final engineering, a sewer connection becomes available, a standalone prefabricated permanent restroom may be installed in proximity to the mechanical and electrical equipment room. Since the proposed Falcon Ridge Substation would be unstaffed and remotely operated, wastewater discharge would be minimal. Wastewater would not be discharged during operation of the proposed distribution getaways, proposed subtransmission source line routes, or the proposed telecommunication facilities.

A-1.169

A-1.170

A-1.171

2-96

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Utilities	4.18-10	Regarding the analysis for significance criterion f) under the heading 4.18.4 Impacts and Mitigation Measures , the following statement should be updated for reasons previously described in the Project Description: “As described in Chapter 2, <i>Project Description</i> , the Project would require the removal and disposal of approximately 25 wood poles.”	As described in Chapter 2, <i>Project Description</i> , the Project would require the removal and disposal of approximately 2537 wood poles.
Comparison of Alternatives	5-2	Under the heading 5.2 Evaluation of Project Alternatives , based on the reasoning provided in the aesthetics analysis, a determination of a significant unavoidable impact for aesthetics is not warranted.	There would be significant unavoidable (Class I) aesthetic , air quality, and noise impacts under the Project and Alternative 1 (Table 5-1). The significant unavoidable impacts of the Project and Alternative 1 on aesthetics and noise would occur along the proposed Etiwanda Subtransmission Source Line route, which would be the same under both scenarios. Therefore, there would be no different between the Project and Alternative 1 with respect to these significant unavoidable impacts.
Comparison of Alternatives	5-3	Regarding Table 5-1 , based on the reasoning provided in the aesthetics analysis, a determination of a significant unavoidable impact for aesthetics is not warranted.	<i>Scenic Vista – Significant Unavoidable:</i> The Project would result in an adverse effect on a scenic vista from South Highland Avenue at San Sevaine Road, looking northwest. <i>Scenic Vista – Significant Unavoidable:</i> Alternative 1 would result in an adverse effect on a scenic vista from South Highland Avenue at San Sevaine Road, looking northwest.
Comparison of Alternatives	5-3	Under the heading 5.3 Environmentally Superior Alternative , based on the reasoning provided in the aesthetics analysis, a determination of a significant unavoidable impact for aesthetics is not warranted.	As discussed in the previous section, the Project and Alternative 1 would have significant and unavoidable impacts on aesthetics , air quality, and noise.

A-1.172

A-1.173

A-1.174

A-1.175

2-97

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Comparison of Alternatives	5-3	Under the heading 5.3 Environmentally Superior Alternative , the text indicates there is no material environmental impact difference between the Project and Alternative 1 for Hazards and Hazardous Materials and Hydrology and Water Quality. However, based on the prior comments that conclusion is not accurate and this section should be updated. Please also see SCE’s accompanying cover letter.	[Please revise the text accordingly.]
Comparison of Alternatives	5-4	Regarding Table 5-2 , for Air Quality it is explained that Alternative 1 is Preferred to the Project, however, a No Preference or Not Preferred conclusion is warranted given the potential for increased TAC emissions with Alternative 1. Please also see SCE’s accompanying cover letter.	[Please revise the text accordingly.]
Comparison of Alternatives	5-4	Regarding Table 5-2 , for Hazards and Hazardous Materials, it is explained that there is No Preference between Alternative 1 and the Project, however, this conclusion is inconsistent with that contained in Table ES-2 and the information contained in prior comments. The Project should be Slightly Preferred or Preferred to maintain consistency in the document and accurately reflect the potential for encountering contaminated soil in connection with Alternative 1. Please also see SCE’s accompanying cover letter.	[Please revise the text accordingly.]
Comparison of Alternatives	5-4	Regarding Table 5-2 , for Hydrology and Water Quality, it is explained that there is No Preference between Alternative 1 and the Project, however, based on prior comments a conclusion that the Project is Slightly Preferred may be warranted. Please also see SCE’s accompanying cover letter.	[Please revise the text accordingly.]

A-1.176

A-1.177

A-1.178

A-1.179

2-98

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

2-99

Section	Page	Comment	Suggested Revision
Comparison of Alternatives	5-5	<p>Under the heading 5.3 Environmentally Superior Alternative, regarding the following statement: “Environmental impacts related to air quality would be materially lessened by implementing Alternative 1”.</p> <p>Without consideration of potential TAC emissions, such a statement cannot be supported by the information currently provided in the DEIR.</p> <p>In addition, the potential Air Quality, Hazards and Hazardous Materials, and Hydrology and Water Quality impacts associated with contaminated soils have a greater potential to create long term consequences than the construction related Air Quality emissions Alternative 1 might avoid. Consistent with CPUC policy, these potential impacts should be considered more important for purposes of comparing the alternatives. Therefore, Alternative 1 would not be the environmentally superior alternative when compared to the Project.</p> <p>Please also see SCE’s accompanying cover letter.</p>	<p align="center">[Please revise the text accordingly.]</p>
Comparison of Alternatives	5-3	<p>Under the heading 5.3 Environmentally Superior Alternative, based on the reasoning provided in the aesthetics analysis, a determination of a significant unavoidable impact for aesthetics is not warranted.</p> <p>Please also see SCE’s accompanying cover letter.</p>	<p>“Regarding impacts to aesthetic resources, impacts under the Project and Alternative 1 would be significant and unavoidable. Alternatives to reduce this impact were considered, including Alternative 8, Alternative 9, and Alternative 10, which considered alternate routes and an alternative crossing of the 210 Freeway (i.e., overhead vs. underground). These alternatives were determined to be infeasible as described in Section 3.5.7, Alternative 8: Parallel to 500 kV Transmission Line (Overhead), Section 3.5.8, Alternative 9: Parallel to 500 kV Transmission Line (Underground), and Section 3.5.9, Alternative 10: Exit Etiwanda Substation to the West. Accordingly, impacts to aesthetic resources are not a determining factor in the selection of the Environmentally Superior Alternative for the Project.”</p>

A-1.180

A-1.181

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Cumulative Impacts	6-1	Under the heading 6.1 Projects Considered in the Cumulative Analysis , please confirm the accuracy of the related projects list and in particular whether any SCE projects should be included in that list. As described in SCE’s PEA, there are approximately 6 SCE projects anticipated to be completed within the vicinity of the Proposed Project. Please note, however that as further described in the PEA, only air quality impacts were expected to be cumulatively considerable, even accounting for the impacts associated with these SCE projects. Because the DEIR already accounts for the cumulative impacts associated with air quality, it is not expected that these projects would generate any new cumulatively considerable impacts not already disclosed in the DEIR.	[Please revise the text accordingly.]
Cumulative Impacts	6-7	Under the heading 6.2.1 Aesthetics , based on the reasoning provided in the aesthetics analysis, a determination of a significant unavoidable impact for aesthetics is not warranted.	The analysis concluded that impacts on scenic vistas from construction, operations and maintenance would range from be less than significant with mitigation (Baseline, Beech, Cherry, Citrus, Etiwanda, Sierra, and Wilson avenues; Foothill Boulevard; I-210; and SR 15), to significant and unavoidable (Highland Boulevard).

A-1.182

A-1.183

2-100

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
Cumulative Impacts	6-8	Under the heading 6.2.1 Aesthetics , based on the reasoning provided above in SCE’s comments on the aesthetics analysis, a determination of a significant unavoidable impact for aesthetics is not warranted. Additionally, CPUC General Order 131-D explains that local land use regulations would not apply to the Project. Local land use policies that describe local scenic preferences are preempted by the regulatory authority of the CPUC. As a result, local designations of local view corridors or scenic gateways do not qualify as scenic vistas or state scenic highways which are the triggers for CEQA analysis. Because scenic vistas are not located in the study area, there would not be a cumulative considerable impact.	The impact analysis concluded that the impact of the Project on scenic vistas from these corridors was less than significant with mitigation, with the exception of Highland Boulevard, from which impacts would be significant and unavoidable. Given the moderate to moderate high visual sensitivity of the roadways in question, and the close proximity of Project components and these cumulative projects, the Project’s incremental contribution would be cumulatively considerable to scenic vistas from these roadways because the cumulative visual change would be moderate to high. No mitigation is feasible that would reduce impacts from these locations to less than significant, as screening techniques to reduce impacts from Project components would be wholly ineffective in mitigating visual impacts from other cumulative projects given the size, scale and character of the cumulative projects (i.e. large scale residential and commercial developments.
Cumulative Impacts	6-17	Regarding Mitigation Measure CUMULATIVE-TRANS , this measure should be deleted for two separate and independent reasons. First, the measure is infeasible because it would require SCE to coordinate traffic control plans with the developers and contractors of other projects in the vicinity, but SCE has no way to force those developers and contractors to participate in any such coordination. As a result, there is no way to enforce this measure and it is therefore infeasible. Second, the measure is excessive and unnecessary because it seeks to achieve the same benefits that would already be achieved through implementation of Mitigation Measure 4.17-1, including plans regarding roadway closures, detour plans, parking, advance notifications and truck haul routes.	Please remove Mitigation Measure CUMULATIVE-TRANS: Coordinated Transportation Management Plan

A-1.184

A-1.185

2-101

FALCON RIDGE DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Section	Page	Comment	Suggested Revision
MMRCP	9-11	Regarding Table 9-1 , all comments relating to impact conclusions as well as mitigation measures can be found in the applicable resource section. Additionally, any revisions made to mitigation measures associated with those comments should also be made in the MMRCP and anywhere else in the DEIR that the mitigation measures appear.	[Please revise the text accordingly.]

A-1.186

2.6.1 Letter A-1 – Responses to Comments from SCE

A-1.1 Regarding the proximity of Alternative 1 to the B.F. Goodrich Superfund Site, see MR1(A). This correctly recites the conclusion reached in the Draft EIR that Alternative 1 would be the Environmentally Superior Alternative. However, see MR1(B) for further information regarding this alternative.

A-1.2 For the reasons provided in the Draft EIR and in these responses to comments, the CPUC disagrees that Alternative 1 has a greater potential to result in new and different impacts to air quality, hazards, and hydrology and water quality. Because this comment does not offer supporting data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts, the CPUC is providing only a general response at this time. Specific concerns about the analysis of potential impacts to these resource areas are addressed in subsequent responses to the more detailed comments that follow.

Comments about the Draft EIR's identification of Alternative 1 as the Environmentally Superior Alternative are addressed in MR1(B).

A-1.3 Questions about the effects of Alternative 1 to air quality, hazards, and hydrology and water quality are addressed in MR1(A). As stated in Response A-1.2, the CPUC disagrees that Alternative 1 has the potential to cause different and potentially more significant impacts to air quality, hazards, and hydrology and water quality. Regarding the CPUC's identification of Alternative 1 as the Environmentally Superior Alternative, see MR1(B). Table 5-2 (Draft EIR, p. 5-4 et seq.) provides a comparison of potential impacts by alternative for each resource category. For the reasons provided in MR1(A) and in these responses to comments, no change to Table 5-2 has been made in response to this comment.

A-1.4 Concerns about construction-related disturbance of contaminated soils on the portion of the Goodrich site now occupied by Rialto Concrete Products are addressed in MR1(A). The stated preference for the proposed Project over Alternative 1, which was identified in the Draft EIR as the Environmentally Superior Alternative in MR1(B), is noted.

A-1.5 Concerns about hazards and hazardous materials-related impacts associated with the disturbance of contaminated soil on the portion of the Goodrich site now occupied by Rialto Concrete Products are addressed in MR1(A). The fact that multiple federal and state agencies, including the EPA, are coordinating with respect to the existing groundwater remediation effort for the Goodrich site has no effect on the efficacy of the Health and Safety Plan that would be required by Mitigation Measure 4.9-1. Finally, conclusions about which is the Environmentally Superior Alternative are made after mitigation measures are implemented, not before. This comment provides no data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts that would support a conclusion that, as mitigated by Mitigation Measure 4.9-1, Alternative 1 would cause any incrementally greater impact than the proposed Project as mitigated by Mitigation Measure 4.9-1.

A-1.6 Concerns about the analysis of hydrology and water quality-related impacts of Alternative 1 are addressed in MR1(A). For the reasons discussed therein, Section 4.10.5 has not been revised in response to this comment.

A-1.7 The most up-to-date information known to the CPUC about the current status of the clean-up at the Goodrich site is provided in MR1(A). Also as discussed in MR1(A), the CPUC will not speculate in this Final EIR as to the potential range of impacts that could result from possible future inconsistencies between a plan that has yet to be developed and Alternative 1.

A-1.8 This comment has been addressed in Responses A-1.1 through and including A-1.7. Neither those comments nor the responses to them trigger CEQA's threshold for requiring all or portions of the Draft EIR to be recirculated for agency and public input. Any revisions made to the Draft EIR in response to Comments A-1.1 through and including A-1.7 are as indicated in MR1(A). For the reasons indicated therein, Draft EIR Chapter 5 has not been revised to conclude that the Project, instead of Alternative 1, is the Environmentally Superior Alternative.

A-1.9 Comments about the Draft EIR's identification of Alternative 1 as the Environmentally Superior Alternative are addressed in MR1(B). For the reasons indicated therein, the conclusion stated on Draft EIR page ES-1 has not been revised.

A-1.10 The number "2" refers to footnote 2: It should have been formatted as superscript. Accordingly, the seventh bullet on page ES-2 of the Draft EIR is revised as follows:

- Serving long-term projected electrical demand requirements in the Electrical Needs Area beginning in 2014;²

The e-mail cited in footnote 2 communicates the input of a technical expert and consultant to the CPUC concerning his independent review of the basis for including a 2014 in-service date as one of the CPUC's basic objectives of the Project. Without a technical basis, the CPUC would not necessarily have identified the Applicant's desired in-service date as such.

A-1.11 The first sentence of the second paragraph on page ES-4 of the Draft EIR is revised as follows:

SCE proposes to construct, operate, and maintain a 66/12 kV unattended, automated, 56 megavolt-ampere (MVA) low-profile substation (the Falcon Ridge Substation) on an approximately 2.7 acres of an approximately 7.5-acre parcel located just south of Casa Grande Avenue, east of Sierra Avenue, north of Summit Avenue and adjacent to SCE's existing transmission ROW, in the City of Fontana, California.

A-1.12 The third sentence of the second paragraph on page ES-4 of the Draft EIR is revised as follows:

In addition to the proposed substation, the Project would include the installation of two subtransmission source line segments; construction of three new ~~five new~~ ~~underground vaults, which also are referred to as~~ distribution getaways; telecommunications (fiber-optic) infrastructure work; and upgrades to existing optical communications equipment at Etiwanda, Alder, and Randall Substations.

The first sentence of the fourth paragraph on page ES-4 of the Draft EIR is revised as follows:

Construction of three ~~five~~ underground 12 kV distribution “getaways.” Three ~~Five~~ new underground vaults, located outside the substation walls on either the SCE substation property, private property, or in franchise.

The first sentence of the third paragraph on page 2-8 of the Draft EIR is revised as follows:

The initial distribution getaways would consist of three ~~five~~ new underground vaults.

A-1.13 The second sentence of the third paragraph on page ES-4 of the Draft EIR is revised as follows:

One segment would be approximately 3 miles in length to form the new Alder 66 ~~45~~ kV Subtransmission Source Line; the other would be approximately 9 miles in length to form the new Etiwanda 66 kV Subtransmission Source Line.

A-1.14 The second sentence of the fifth paragraph on page ES-4 of the Draft EIR is revised as follows:

At ultimate build out, the Falcon Ridge Substation could accommodate sixteen ~~16~~ separate 12 kV distribution circuits.

A-1.15 The first sentence of the fifth paragraph on page ES-4 of the Draft EIR is revised as follows:

Within the substation site, distribution circuits would be placed in an underground conduit system, also known as a “distribution getaway.” A distribution getaway consists of multiple vaults connected by one or more conduit systems (a conduit is also sometimes referred to as a duct).

A-1.16 The second sentence under “Applicant Proposed Measures” on page ES-5 of the Draft EIR is revised as follows:

These measures relate to ~~aesthetics~~, biological resources, and paleontological resources.

A-1.17 The last sentence under “APM-BIO-01” on page ES-5 and on page 4-3 of the Draft EIR has been deleted:

~~APM-BIO-02: Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Sage Scrub, and Annual Grassland/Disturbed Riversidean Alluvial Fan Sage Scrub Project impacts on sage scrub vegetation.~~

A-1.18 The following is added after the last sentence under “APM-BIO-02” on Draft EIR page ES-6:

In lieu of developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition, and habitat types present are comparable to impacted habitat at the proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

A-1.19 The “No Project Alternative” on page ES-7 of the Draft EIR is revised as follows:

Under the No Project Alternative, no action would be taken. The proposed substation site would continue to be undeveloped ~~used for agriculture~~ unless and until some other use was approved (consistent with applicable land use regulations and in accordance with available infrastructure and community services). The existing electric power infrastructure (~~including the Nuevo Substation, temporary Model Pole Top Substation, subtransmission and telecommunications facilities~~) would remain in place, serving the Electrical Needs Area with decreasing reliability as the electrical demands of growing area communities increase. The projected energy demand in this area is expected to exceed the combined energy capacity of the existing substations in the ~~2013-~~ 2014 timeframe.

The analysis of the No Project Alternative in this document focuses on a no-development/no Project scenario where the existing undeveloped agricultural use is continued. With a no-development scenario, the proposed substation site would

continue to be undeveloped ~~in agricultural use~~ and the existing environmental setting would be maintained. Changes to that setting, including changes to the landscape (aesthetics, habitat, and land use/~~agriculture~~); construction-related noise, traffic, and air and greenhouse gas emissions would not occur. Available ~~irrigation infrastructure would remain in place, and~~ public services and utilities would continue to be provided or available to the site as they are now.

A-1.20 The last sentence under “Alternative 1” on page ES-7 of the Draft EIR is revised as follows:

Approximately 12 ~~Three~~ tubular steel poles (TSPs) would be required, ~~one at each of the proposed corners.~~ Approximately 76 light weight steel (LWS) Wood poles and 6 wood/LWS guy poles would be installed along the extension of Summit Avenue, Mango Avenue, North Alder Street, Lowell Street, and along Locust Avenue.

A-1.21 See Response A-1.2. Questions about the effects of Alternative 1 to air quality are addressed in MR1(A). Regarding the CPUC’s identification of Alternative 1 as the Environmentally Superior Alternative, see MR1(B). For the reasons provided in MR1(A) and in these responses to comments, no change to the Draft EIR has been made in response to this comment.

A-1.22 Revisions to Table ES-1, Summary of Impacts and Mitigation Measures for the Project, are shown in Chapter 3, Revisions to the Draft EIR.

A-1.23 Following the last bullet point in Mitigation Measure 4.4-1 on Draft EIR page 4.4-34 (and shown in Table ES-1 on Draft EIR page ES-13), the following text is added:

As an alternative to developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project’s mitigation requirements.

A-1.24 The last bullet of Mitigation Measure 4.4-4 on page 4.4-36 (and shown in Table ES-1) of the Draft EIR is revised as follows:

- ~~Shield wires to minimize the effects from bird collisions.~~

A-1.25 See MR1.

A-1.26 Table 1-1 on page 1-3 of the Draft EIR is revised as follows:

Permits and Other Requirements	Agency	Jurisdiction/Purpose
Federal		
Nationwide or Individual Permit (Section 404 of the Clean Water Act)	United States Army Corps of Engineers (Corps)	Construction impacting Waters of the United States, including wetlands
Notification and approval request for use of construction cranes	Federal Aviation Administration	Use of objects greater in height than the distance from the closest runway divided by 100, to a distance of 20,000 feet, including along most of the Alder Subtransmission Source Line Route.
State		
Permit to Construct	California Public Utilities Commission	Overall project approval and California Environmental Quality Act review
Encroachment Permit Permit for Oversize Loads	California Department of Transportation, District 8	Caltrans has the discretionary authority to issue special permits for the movement of vehicles/loads exceeding statutory limitations on the size, weight, and loading of vehicles contained in Division 15 of the California Vehicle Code. Caltrans also has discretionary authority to issue encroachment permits for the use of California State highways for purposes other than normal transportation, including construction, operation and maintenance activities within, under or over a state highway right-of way.
Aerial Utility Crossing Permit	San Bernardino County Flood Control District (SBCFCD)	Aerial crossings of flood control and storm drain facilities.
Wire Line Crossing Permit	Burlington Northern Santa Fe (BNSF) Railway	Per CPUC General Order No. 95, consent must be obtained from rail line owners for supply and communication line crossings.
Section 7 Consultation	California Department of Fish and Game	Construction, operation, and maintenance activities that may affect a state-listed species or its habitat; incidental take authorization (if required)
<u>Streambed Alteration Agreement (1600)</u>	<u>California Department of Fish and Game</u>	<u>Construction, operation, and maintenance activities that may modify the bed, bank, or channels of any streambeds.</u>
Regional and Local		
National Pollutant Discharge Elimination System Construction General Stormwater Permit	Santa Ana California Regional Water Quality Control Board (RWQCB)	Stormwater discharges associated with construction activities disturbing more than 1 acre of land
Section 401 Water Quality Certification (or waiver)	RWQCB	Certifies that project is consistent with state water quality standards
Encroachment Permit (ministerial)	San Bernardino County City of Rialto City of Rancho Cucamonga City of Fontana	Construction, operation, and maintenance within, under, or over city road ROW ¹
Permits and Other Requirements	Agency	Jurisdiction/Purpose
Traffic Control Permit	City of Fontana	Temporary lane closures
Lane Closure Permit	City of Rancho Cucamonga	Temporary lane closures

Permits and Other Requirements	Agency	Jurisdiction/Purpose
Regional and Local (cont.)		
<u>Ministerial Grading Permit/SWPPP</u>	County of San Bernardino City of Rialto City of Rancho Cucamonga City of Fontana	San Bernardino County: before a project may undertake excavation greater than two feet in depth or a fill one foot or more in thickness Rialto: before a project may move more than 50 cubic yards of earth Rancho Cucamonga: before a project may do any grading Fontana: before a project may cut or fill soil to a depth of more than 12 inches to support a structure
<u>Aerial Utility Crossing Permit</u>	<u>San Bernardino County Flood Control District (SBCFCD)</u>	<u>Aerial crossings of flood control and storm drain facilities.</u>
<u>Encroachment Permit or Agreement</u>	<u>Southern California Regional Rail Authority (SCARRA)</u>	<u>Per CPUC General Order No. 95, consent must be obtained from rail line owners for supply and communication line crossings.</u>
<u>Spill Prevention, Control, and Countermeasure (SPCC) Plan</u>	<u>San Bernardino County Fire Department</u>	<u>For storage of mineral oil in an aboveground tank with a capacity greater than 1,320 gallons.</u>

1 Encroachment permits for San Bernardino County and the City of Rialto include traffic control and temporary lane closures.

SOURCES: SCE, 2010a; SBCFCD, 2011; BNSF, 2010; San Bernardino County, 2011; City of Fontana, 2011; City of Rancho Cucamonga, 2011; City of Rancho Cucamonga, 2010; SBCFD, 2011

A-1.27 Requested revisions to Draft EIR Table 1-1 are incorporated in Response A-1.26.

A-1.28 The first two complete sentences on page 2-3 of the Draft EIR are revised as follows:

The 66 kV subtransmission facilities would then again extend northeast within SCE’s existing transmission ROW to a point ~~until it intersects with~~ approximately 0.25 mile north of Summit Avenue. The 66 kV subtransmission facilities would then extend east primarily on SCE’s existing transmission ROW until it reaches the Falcon Ridge Substation.

A-1.29 The seventh sentence under “Falcon Ridge Substation” on page 2-4 of the Draft EIR is revised as follows:

The Falcon Ridge Substation would include a 66 kV switchrack, a 66 kV Circuit Breakers and Disconnect Switches, two 28 MVA, 66/12 kV Transformers, one 12 kV Switchrack, capacitor banks, a Mechanical and Electrical Equipment Room (MEER), distribution getaways, a restroom facility, an asphalt concrete access road, lighting, perimeter walls, gates, and drainage.

A-1.30 The first two sentences under “66 kV Switchrack” on page 2-4 of the Draft EIR are revised as follows:

One steel 66kV switchrack, up to ~~196~~ 154 feet long by 82 feet wide by 25 feet high would be installed. The switchrack would consist of eight ~~22~~ 18-foot-wide positions (e.g., two for subtransmission source lines, two for transformer banks, one for a bus-tie between the operating and transfer buses; and three vacant for future use).

This change in the dimensions of the switchrack does not affect the adequacy or accuracy of the analysis in the Draft EIR because the full (revised) extent of the switchrack would be constructed, operated, and maintained within the area of disturbance considered in the Draft EIR.

A-1.31 Figure 2-2 on page 2-5 of the Draft EIR has been replaced in order to accurately show the access roads. Revised Draft EIR Figures, including Figure 2-2, are included in Appendix G.

A-1.32 Figure 2-3 on page 2-6 of the Draft EIR has been replaced in order to show the modified substation layout (see Appendix G).

A-1.33 Consistent with Response A-1.20, the first sentence on Draft EIR page 2-7 is revised as follows:

Each operating and transfer bus would be ~~196~~ 144 feet long and consist of two 1,590 kcmil (thousand circular mills) Aluminum Conductor Steel Reinforced (ACSR) for each of the three electrical phases.

A-1.34 The last sentence on Draft EIR page 2-7 is revised as follows:

The MEER dimensions would be approximately 36 feet long by ~~15~~ 20 feet wide by 11 feet tall.

A-1.35 Although this comment provides insufficient detail about the proposed additional restroom option to determine whether the scope of potential environmental effects of such a system has been evaluated in the Draft EIR, SCE subsequently provided additional information about the proposed restroom option.²¹ The proposed facility would consist of a manufactured prefabricated concrete structure measuring approximately 8 feet by 10 feet and 10 feet tall placed on a 12-inch thick reinforced concrete foundation slab. The restroom would be located within a chain link fenced enclosure approximately 40 feet north of the substation driveway gate. A separate walk-in gate would allow a contracted service provider to access the restroom without entering the substation operating areas. The exterior wall surface texturing of the facility would be either a “Barn-wood” simulation of rustic siding or stucco. The roof texture would either be cedar shake or tile simulation. All exterior colors would be determined during the design and procurement phase and would match as close as possible the substation’s external concrete modular block wall, with concurrence by the City of Fontana. Exterior lighting would consist of a

²¹ Response to Data Request No. 7, August 30, 2012.

manually operated wall-mounted dual lamp fixture located over the toilet area door. No automatic lighting would be required.

Waste storage would be managed by the installation of a separate 5 feet by 8 feet subsurface reinforced concrete septic tank buried at a depth of approximately 7 feet with approximately 12 inches of soil cover that would be located immediately inside the walk-in gate. There would be no leaching lines installed either inside or outside the substation facility and property. All external and internal surfaces of the tank would be sealed to prevent seepage through the walls. Two top surface access ports would allow for servicing. The location of the septic tank would prevent any vehicle traffic from driving over the tank. Periodic maintenance of the tank would be conducted by a contracted service provider. Water would be provided by domestic water line connected to the nearest water service source and would be potable.

The proposed restroom facility option would not result in any new significant environmental impact or any substantial increase in the severity of an environmental impact relative to the effects analyzed in the Draft EIR. There could be an extra hour or two of work for a dozer (e.g., to clear an area for the concrete pad), a half day for an excavator (e.g., to dig out the area for the tank), and approximately two to four trips to deliver materials including the prefabricated bathroom and concrete. The tank would be totally closed to the environment, and so would not pose a waste-related hazard under normal conditions. Potential upset conditions would be addressed by compliance with the Health and Safety Plan that would be required by Mitigation Measure 4.9-1 (Draft EIR, p. 4.9-20). Therefore, the following is added after the last sentence of the first paragraph on page 2-8 of the Draft EIR:

Additionally, another potential option includes a permanent restroom equipped with a self-contained waste disposal system installed within the substation perimeter near the entry gate.

A-1.36 For clarity, the second sentence of the fifth paragraph on page 2-8 of the Draft EIR is revised as follows:

At ultimate build out, the Falcon Ridge Substation could accommodate sixteen separate 12 kV distribution circuits.

A-1.37 The following is added after the last sentence on page 2-8 of the Draft EIR to clarify that future 12 kV may require supplemental CEQA analysis, but would not be subject to further CEQA analysis by the CPUC:

Supplemental CEQA analysis may be required before these circuits are constructed, operated and maintained in the future; however, under General Order No. 131-D, the future 12 kV distribution circuits would not be subject to additional CEQA analysis by the Commission.

A-1.38 The last two sentences of the third paragraph on page 2-10 of the Draft EIR are revised as follows:

Prior to commencement of the substation construction, SCE would consult with the City of Fontana to develop an appropriate landscaping plan and perimeter wall design that would be submitted with the ministerial grading permit application for the Project. The landscaping plan, to the extent practicable, would be consistent with Fontana Ordinance 1625, Landscaping and Water Conservation.

A-1.39 Because the nature of the grading permit as “ministerial” has been emphasized and clarified in Draft EIR Table 1-1 (p. 1-3) and two paragraphs above where this proposed change is requested, the clarification has not been reiterated here.

A-1.40 Per section 25270.3 of Chapter 6.67 of the Health and Safety Code, a tank facility is subject to the Aboveground Petroleum Storage Act if the tank facility has a petroleum storage capacity of 1,320 gallons or more regardless of whether the tank facility has a reasonable expectation of discharging oil into a navigable water or adjoining shoreline. Therefore, if the proposed tank facility would store 1,320 gallons or more of petroleum, the Project would be subject to the Aboveground Petroleum Storage Act and a federally compliant SPCC Plan would be required to be prepared and implemented. Alternatively, if the Project ultimately does not trigger the requirements of the Aboveground Petroleum Storage Act, then the Act’s SPCC requirement would not apply. Therefore, the suggested revisions are rejected; however, the following changes have been made to the Aboveground Storage of Petroleum Products regulatory setting discussion on Draft EIR page 4.9-12 to clarify the Aboveground Petroleum Storage Act requirements.

Assembly Bill 1130 (2007) updated the Aboveground Petroleum Storage Act of 1990 (Health and Safety Code §§25270 to 25270.13) and requires the owner or operator of a tank facility with an aggregate storage capacity greater than 1,320 gallons of petroleum to file an inventory statement with the local CUPA and to prepare a spill prevention, control, and countermeasure (SPCC) plan. An SPCC plan must identify appropriate spill containment or equipment for diverting spills from sensitive areas, as well as discuss facility-specific requirements for the storage system, inspections, recordkeeping, security, and personnel training.

~~The Aboveground Petroleum Storage Act (1990) and Assembly Bill 1130 (2008) require the owner or operator of a tank facility with an aggregate storage capacity greater than 1,320 gallons of petroleum to file an inventory statement with the CUPA and to prepare and implement a spill prevention, control, and countermeasure (SPCC) plan in accordance with the requirements of 40 CFR 112. The plan must identify appropriate spill containment or equipment for diverting spills from sensitive areas, as well as discuss facility-specific requirements for the storage system, inspections, recordkeeping, security, and personnel training.~~

A-1.41 Consistent with Response A-1.28, the third and fourth complete sentences on Draft EIR page 2-12 are revised as follows:

The 66 kV subtransmission line would then again extend northeast within SCE's existing transmission ROW, to a point approximately 0.25 mile north of until it intersects with Summit Avenue. The 66 kV subtransmission line would then extend east primarily on SCE's existing transmission ROW until it reaches the substation site.

A-1.42 Table 2-1 on page 2-12 of the Draft EIR is revised as follows:

**TABLE 2-1
APPROXIMATE SUBTRANSMISSION STRUCTURE DIMENSIONS**

Pole Type	Approximate Diameter	Approximate Height Above Ground	Approximate Auger Hole Depth	Approximate Auger Hole Diameter
Wood	1 to 2 feet	35 to 75 feet	8 to 10 feet	2 to 4 feet
Light Weight Steel (LWS)	<u>1 2</u> to 3 feet	<u>35 65</u> to 100 feet	8 to 11 feet	2 to 4 feet
Tubular Steel Pole (TSP)	2 to 4 feet	70 to 100 feet	Not Applicable	Not Applicable
TSP Concrete Foundation	5 to 8 feet	2 to 4 feet	20 to 30 feet	5 to 8 feet

SOURCE: SCE, 2010a

The second sentence under "Light Weight Steel Poles" on Draft EIR page 2-14 is revised as follows:

LWS poles typically range from 35 65 to 100 feet ags with a base diameter of 1 2 to 3 feet tapering to approximately 1 foot diameter at the top of the pole.

This refinement of the dimensions of LWS poles does not affect the adequacy or accuracy of the environmental analysis in the EIR because analysis of slightly larger (i.e., taller or larger-diameter) poles than actually would be installed would tend to overstate rather than understate potential ground disturbance-related, visual and other potential effects. Consequently, the analysis in the EIR is appropriately conservative.

A-1.43 Comment noted. Revised Draft EIR figures, including Figure 2-5, are included in Appendix G.

A-1.44 The following is added after "Location 6" on Draft EIR page 2-15:

- **Location 7: In the area of future Mango Avenue south of Summit Avenue, approximately 12 distribution poles would be removed and the existing facilities and transferred to the proposed subtransmission poles.**

These poles would be removed in accordance with the description provided in Draft EIR Section 2.9.8 (p. 2-34). As indicated in Draft EIR Table 2-5 (p. 2-37), no permanent disturbance would result from this proposed activity. The potential impacts of pole removal and the relocation of existing distribution facilities are analyzed on a resource-by-resource basis in the Draft EIR (see, e.g., Draft EIR Section 4.9, Hazards and Hazardous Materials, p. 4.9-19; and Section 4.18, Utilities and Service Systems, p. 4.18-10).

A-1.45 Section 2.7, “Rights-of-Way Requirements” on Draft EIR page 2-16 is revised as follows:

The Falcon Ridge Substation would be constructed on an approximately 7.5-acre parcel of land owned by SCE.

SCE would need to upgrade existing rights for a strip of land approximately 24 acres with a 30-foot wide by approximately 6 miles long strip of land located within the existing 250-foot-wide ROW corridor which extends 7 miles along the SCE’s existing transmission ROW. SCE’s current easement does not allow SCE to install additional facilities in the easement ROW; therefore, SCE would amend the existing easement to allow additional facilities, such as the proposed subtransmission line, to be installed within the existing easement.

SCE would also utilize ~~approximately 7.5 acres with~~ a 30-foot-wide strip of land located within the existing ~~SCE fee owned 330-foot-wide, 2 miles in length transmission ROW~~ ROW corridor extending approximately 1.75 miles in length, parallel to and north of Summit Avenue. In addition, SCE would need to acquire rights for a 30-foot-wide strip of land located outside of the existing 330-foot-wide transmission ROW, extending approximately 0.5 mile. The additional 30-foot-wide easement strip is required to maintain conductor clearance between the existing 500 kV line and the proposed 66 kV line to accommodate conductor swing. This segment begins approximately 716 feet east of Cypress Avenue and extends east approximately 1,944 feet to Sierra Avenue and continues east and northeast approximately 703 feet to the proposed substation location.

Finally, SCE would need to acquire approximately 13 acres of new easement rights for a 30-foot-wide ROW for the subtransmission source lines and access roads. ~~SCE would acquire a 30-foot wide easement for the subtransmission source lines~~ for a distance of approximately 3.6 miles. The new acquisition of ROW would occur along South Highland Avenue, San Sevaine Road, the future extension of Mango Avenue, West Casmalia Street, and Locust Avenue.

This clarification of new right-of-way requirements is shown on Figures 2-3a through 2-3c. In general, the Project would cause or contribute to each of the direct, indirect, and cumulative effects analyzed in the EIR regardless of the underlying ownership or control of the affected property. Specific concerns about potential effects of this ROW clarification on Land Use and Planning are addressed in responses to Comment Letter C-3.

A-1.46 If additional geotechnical investigations prove not to be necessary, then none would be required. No change to the text of the Draft EIR has been made.

A-1.47 The sentence above the bulleted list under “Construction” on page 2-18 of the Draft EIR is revised for clarity as follows:

Project construction would generally consist of the following components ~~occur in the following manner:~~

A-1.48 The last sentence of the second paragraph under “Access Roads” on page 2-19 of the Draft EIR is revised as follows:

The graded road would have a minimum drivable width of 14 feet with 2 feet of shoulder on each side but may be wider depending upon field conditions as well as at some individual curve locations.

The study areas analyzed in the Draft EIR are wider than the individual road widths. See, e.g., Draft EIR Section 4.5, *Cultural Resources* (p. 4.5-6), which discloses that the San Bernardino Archaeological Information Center record search conducted for the Project extended at least 0.25 mile from proposed Project features. Accordingly, having access roads be wider than 18 feet on some curves would not cause or contribute to any different or greater impacts than were analyzed in the Draft EIR.

A-1.49 The first complete sentence on page 2-20 of the Draft EIR is revised as follows:

Additionally, for new access roads, road gradients would be leveled so that any sustained grade does not exceed 14 ~~12~~ percent.

A-1.50 The eighth bulleted item on page 2-21 of the Draft EIR is revised as follows:

- A new 24-foot-wide paved access road accessed via an asphalt concrete driveway along Sierra Avenue would be utilized for both substation and subtransmission line access. It is described in Section 3.1.1, Falcon Ridge Substation Description, subsection Substation Access. New 14-foot stub roads extending from this paved access road would be constructed in order to provide access to any subtransmission structures between Sierra Avenue and Mango Avenue ROW. These stub roads would be approximately 1,100 feet in length.

A-1.51 The tenth bulleted item on page 2-21 of the Draft EIR is revised as follows:

- A concrete driveway apron would be provided for all access roads extending from major roads.

A-1.52 Additional staging areas are identified, and their potential impacts analyzed, in MR4. If additional alternative staging areas are required, supplemental CEQA review could be required.

A-1.53 As analyzed in Draft EIR Section 4.17.4 (p. 4.17-9), “It is expected that Project-generated truck trips, delivering materials and equipment, would occur during off-peak commute hours....” Accordingly, the requested change has not been made.

A-1.54 “Multiple” means more than one. The existing description is clear that LWS poles consist of more than one section. The precise number of component pieces of a LWS pole would not affect the direct, indirect, or cumulative effects of their construction, operation, or maintenance. Differences between wood poles and LWS poles are shown in Draft EIR Figure 2-5. The requested change has not been made.

A-1.55 The clarification that bolts or welds may not be required is noted. Accordingly, the second and third sentences of the fourth paragraph on page 2-26 of the Draft EIR are revised as follows:

For LWS poles, after the base section is secured, the remaining top section would be placed onto the base section and the two sections would be set into place bolted together. ~~The two sections may also be spot welded together for additional stability.~~

A-1.56 Clarification of the timing of slurry installation is noted. The second sentence of the third paragraph on page 2-27 of the Draft EIR is revised as follows:

Mud slurry would be placed in the hole ~~after~~ during drilling as required to prevent the sidewalls from sloughing.

A-1.57 See Response A-1.54.

A-1.58 Consistent with Response A-1.55, the last two sentences of the sixth paragraph on page 2-27 of the Draft EIR are revised as follows:

When the base section is secured, the remaining sections would be set into place top section of the TSP would be set into place onto the base section and the two sections would be bolted together. ~~The two sections may also be spot welded together for additional stability.~~

A-1.59 The requested revision does not affect the adequacy or accuracy of the analysis of potential environmental effects of the Project, and so has not been made.

A-1.60 The first sentence under “Storm Water Pollution Prevention Plan” on page 2-36 of the Draft EIR is revised as follows:

Construction of the Project would disturb a surface area greater than 1 acre; therefore, SCE would be required to obtain coverage under the Statewide Construction General Permit (Order No. 2009-0009-DWQ) ~~from the Santa Ana RWQCB.~~

A-1.61 The following footnote is added to “City of Rialto” in Table 2-7 on page 2-44 of the Draft EIR:

Additionally, it should be noted that, for construction activities occurring within the City of Rialto, Rialto Municipal Code Section 9.50.060 exempts “[c]onstruction, operation, maintenance and repairs of equipment, apparatus or facilities...including...those of public utilities subject to the regulatory jurisdiction of the California Public Utilities Commission.”

A-1.62 Consistent with Response A-1.16, the first sentence of the last paragraph on Draft EIR page 2-44 is revised as follows:

SCE identified a number of applicant proposed measures (APMs) that would avoid or reduce potential impacts of the Project related to ~~aesthetics~~, biological resources and paleontological resources.

A-1.63 Consistent with Responses A-1.17 and A-1.18, the last sentence of the second paragraph on Draft EIR page 2-45 is deleted:

~~APM-BIO-02: Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Sage Scrub, and Annual Grassland/Disturbed Riversidean Alluvial Fan Sage Scrub Project impacts on sagescrub vegetation.~~

And the following is added after the last paragraph of APM-BIO-02 on page 2-46:

In lieu of developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition, and habitat types present are comparable to impacted habitat at the proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

A-1.64 See MR1(A). For the reasons provided in MR1(A) and in these responses to comments, no change has been made to Table 3-2 in response to this comment.

A-1.65 Consistent with MR1(A), the “Environmental Criteria” column for Alternative 1 on page 3-6 of the Draft EIR is revised as follows:

Hazards: Has potential to cross areas of higher fire hazard classification and would cross the Rialto Concrete Products site, which occupies a portion of the

area that is the subject of the B.F. Goodrich Superfund Site cleanup plan be adjacent to three sites listed on the USEPA's CERCLIS database of contaminated sites.

See also Final EIR Figure 2-1, which clarifies the boundary of the Goodrich site relative to Alternative 1.

A-1.66 See MR1(A). For the reasons provided in MR1(A) and in these responses to comments, no change has been made to Table 3-2 in response to this comment.

A-1.67 The "Environmental Criteria" column for Alternative 1 on page 3-6 of the Draft EIR is revised as follows:

Aesthetics: no change anticipated.

Noise: no change anticipated.

A-1.68 Alternative 1 in Table 3-2 on page 3-6 of the Draft EIR is revised as follows:

Three Approximately 12 TSPs would be required, one at each of the proposed corners. Wood Approximately 76 lightweight steel (LWS) poles and 6 wood/LWS guy poles would be installed along the extension of Summit Avenue, Mango Avenue, North Alder Street, Lowell Street, and along N. Locust Avenue.

A-1.69 Alternative 2 in Table 3-2 on page 3-6 of the Draft EIR is revised as follows:

- Replacement of two 22.4 MVA transformers with two 28 MVA transformers at the Randall Substation, extension of distribution switchrack, and construction of one ~~1-mile~~ 12 kV distribution circuit estimated to be approximately 1 mile in length; and
- Replacement of two 22.4 MVA transformers with two 28 MVA transformers at the Alder Substation, relocation of existing substation equipment, equipment upgrades, and construction of one ~~1-mile~~ 12 kV distribution circuit estimated to be approximately 1 mile in length.

A-1.70 Consistent with Response A-1.68, the description of Alternative 1 on page 3-11 of the Draft EIR is revised as follows:

Three Approximately 12 TSPs would be required, one at each of the proposed corners. Wood Approximately 76 LWS poles and 6 wood/LWS guy poles would be installed along the extension of Summit Avenue, Mango Avenue, North Alder Street, Lowell Street, and along N. Locust Avenue.

A-1.71 The following is added to the description of Alternative 1 on page 3-11 of the Draft EIR:

Additional detail regarding Alternative 1 is as follows:

- Removal of one existing LWS pole and replacement with one new TSP outside of Alder Substation.
- Reconfiguring of several existing pole heads to accommodate the additional circuit from Alder Substation.
- Removal of approximately 31 existing wood distribution poles along Locust Avenue that contain distribution facilities, SCE telecommunications cable, and three third party (private) communication lines. Installation of new LWS poles and TSPs along Locust Avenue to accommodate the new 66 kV source line and the existing distribution facilities. The three third party (private) communication lines would have the option of attaching to the new subtransmission poles or relocating/re-routing due to the voltage increase.
- Installation of a combination of LWS poles and TSPs along Lowell Street, N. Alder Avenue, Summit Avenue, and Mango Avenue.
- Installation of several wood/LWS guy poles at several locations along the route.
- Existing sidewalks would need to be repaired and widened at several locations along the route.
- New access roads would be required to construct and maintain the subtransmission facilities.
- New fiber-optic cable would be attached to the new subtransmission poles.
- The final alignment and configuration of the new 66 kV line crossing private property between the end of Lowell Street and Alder Avenue would be determined during negotiations for easements with the property owner. Easements also would be required along the future west side of Mango Avenue. Easements would be required on Lowell Street to allow the poles to be set behind the future curb. Easements rights would be required to be upgraded on Locust in addition to overhang easements at Locust Avenue and Lowell Street. Overhang and/or anchor guy easements may be required along Locust Avenue, and at the corner of Alder Avenue and Summit Avenue.

A-1.72 Consistent with Response A-1.71, the second sentence under “Alternative 1” on page 3-11 of the Draft EIR is revised as follows:

This component of Alternative 1 would consist of the new 66 kV subtransmission facilities that would leave Alder Substation on existing structures (Etiwanda-Alder-Randall 66 kV Subtransmission Line) to the west for approximately 600 feet and would include removing one LWS pole, replacing it with one new TSP, and re-framing pole-heads to accommodate the second circuit. The new 66 kV subtransmission facilities on new structures would then extend north on Locust Avenue (spanning the 210 Freeway) and continue north along Locust Avenue (overbuilding an existing 12 kV line) until it intersects with Lowell Street extend

north from Alder Substation, spanning the 210 Freeway and following Locust Avenue until its intersection with Lowell Street.

A-1.73 Consistent with MR1(A), the second sentence of the second paragraph on page 3-12 of the Draft EIR is revised as follows:

It also has the potential to cross areas of higher fire hazard classification than the Project alignment and would cross the Rialto Concrete Products site, which occupies a portion of the area that is the subject of the B.F. Goodrich Superfund Site cleanup plan ~~be adjacent to three sites listed on the USEPA's CERCLIS database of contaminated sites.~~

A-1.74 Figure 3-1 (Draft EIR, p. 3-14) has been replaced to reflect updated information associated with Alternative 1. Revised Draft EIR figures, including this one, are included in Appendix G.

A-1.75 The second bulleted item on page 4-1 of the Draft EIR is revised as follows:

- Installation of ~~two~~ one approximately 3-mile-long and one approximately 9-mile-long 66 kV subtransmission source line segments to connect the Falcon Ridge Substation to the existing Alder and Etiwanda Substation, respectively.

These numbers and distances were correctly recited in the Draft EIR's Executive Summary (p. ES-4) and Project Description (Draft EIR, p. 2-3 and p. 2-11), and the analysis of direct, indirect and cumulative effects of the Project considered subtransmission source line segments of these distances (see, e.g., Draft EIR Section 4.14.4, p. 4.14-5, Population and Housing criterion b)). The inadvertent misstatement in the Introduction to Environmental Analysis (Draft EIR, p. 4-1) does not affect the adequacy or accuracy of the analysis.

A-1.76 Consistent with Response A-1.18, the following is added after the last paragraph of APM-BIO-02 on page 4-4 and on page 4.4-31:

In lieu of developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition, and habitat types present are comparable to impacted habitat at the proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

A-1.77 The second sentence under “Land Use and Development Pattern” on page 4.1-6 of the Draft EIR is revised as follows:

The visual quality of the site is representative and characteristic of vacant and undeveloped agricultural land in the study area.

A-1.78 The fifth sentence under “Land Use and Development Pattern” on page 4.1-6 of the Draft EIR is revised as follows:

Surface terrain is characterized by undeveloped ~~agricultural and~~ open space ~~land~~ covered with grass and brush (see Figure 4.1-2a, Photo A).

A-1.79 The paragraph under “Local,” preceding the statement in question, contains clear language indicating that local land use regulations would not apply to the Project. Further, in the context of the analysis of significance criterion b), Draft EIR Section 4.11.4 (p. 4.11-11) is clear that the permit requirements of the land use plans, policies, and regulations of San Bernardino County and the cities of Fontana, Rialto, and Rancho Cucamonga do not apply, and that the analysis in that section is provided “for informational purposes only.” Accordingly, the requested change has not been made.

A-1.80 See Response A-1.79.

A-1.81 See Response A-1.79.

A-1.82 See Response A-1.79.

A-1.83 As stated on Draft EIR page 4.11-2, the CPUC has sole and exclusive jurisdiction over Project siting and design. The Project is therefore exempt from local land use and zoning regulations. Any inconsistencies of the Project with local land use policies, such as the City of Fontana’s preference for scenic view corridors, would not limit the CPUC’s discretionary authority over the Project. The determination under CEQA that the Project would have an adverse effect on a local scenic vista is unrelated to the permitting authority retained exclusively by the CPUC. Therefore, no change to the impact analysis or conclusion is warranted.

A-1.84 The eighth sentence of the second paragraph on page 4.1-26 of the Draft EIR is revised as follows:

Although not visible in the simulation, from this KOP viewers would also see the Etiwanda Subtransmission Source Line Route as it crossed Sierra Avenue and headed west adjacent to ~~within~~ existing ROW.

A-1.85 The description of the view from South Highland Avenue and San Sevaine Road is accurately presented in the Draft EIR; no change is warranted.

A-1.86 See Responses A-1.83 and A-1.85. No change in the impact discussion or conclusion is warranted.

A-1.87 The second sentence under Impact 4.1-4 on page 4.1-31 of the Draft EIR is revised as follows:

All telecommunication equipment upgrades at the existing substations would occur within the existing MEER or within existing structures; therefore, no additional ground disturbance is associated with the proposed telecommunications work.

A-1.88 The requested supplementation of the definition of “Prime Farmland” on page 4.2-2 of the Draft EIR does not affect the adequacy or accuracy of the analysis in the Draft EIR because no Prime Farmland would be affected by the Project (see Draft EIR, p. 4.2-3 and Figure 4.2-1, which is found on page 4.2-4). Accordingly, the requested addition has not been made.

A-1.89 The following is added to the definition of “Unique Farmland” on page 4.2-2 of the Draft EIR:

Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

A-1.90 The requested supplementation of the definition of “Farmland of Statewide Importance” on page 4.2-2 of the Draft EIR does not affect the adequacy or accuracy of the analysis in the Draft EIR because no Farmland of Statewide Importance would be affected by the Project (see Draft EIR Figure 4.2-1 p. 4.2-4). Accordingly, the requested addition has not been made.

A-1.91 See Response A-1.79.

A-1.92 See Response A-1.79.

A-1.93 The quoted regulatory exemptions apply whether the regulatory setting summarizes them or not. Because the requested additional language, if added, would not affect the adequacy or accuracy of the analysis in the Draft EIR, the change has not been made.

A-1.94 The following changes have been made to the cleaning forms rows of Table 4.3-3 on Draft EIR page 4.3-10 to more accurately describe the requirements of SCAQMD Rule 403.

Clearing forms	03-1	Use water spray to clear forms, <u>or</u>
	03-2	Use sweeping and water spray to clear forms, <u>or</u>
	03-3	Use vacuum system to clear forms.

- A-1.95 The subject paragraph on Draft EIR page 4.3-11 contains clear language indicating that the local land use policies would not apply to the project. The requested edit is not necessary.
- A-1.96 Based on a South Coast Air Quality Management District (SCAQMD) recommendation, Mitigation Measure 4.3-1a has been revised to require SCE to make a good faith effort to use the highest USEPA-certified tiered construction equipment available (see Response B-4.1, below).
- A-1.97 The following edit has been made to Draft EIR page 4.3-17 to accurately state the applicable air district.

As noted above, implementation of the ~~BAAQMD~~-SCAQMD fugitive dust BACMs have been factored into the emission estimates presented in Table 4.3-6

- A-1.98 The following edits have been made to the end of the first paragraph under Impact 4.3-5 on Draft EIR page 4.3-21 to acknowledge that there would be a small amount of long-term Project-related vehicle DPM emissions associated with the Project.

There would be no long-term ~~mobile or stationary~~ permanent sources of DPM emissions associated with operation and maintenance of the Project; however, there may occasionally be a need for a small number of diesel operated vehicles to perform certain maintenance activities. Emissions from these vehicles would be negligible and would not contribute to regional air quality violations.

- A-1.99 The reduction in PM10 and PM2.5 that would occur under construction of Alternative 1 is based on a reduction of travel on unpaved roads compared to the travel on unpaved roads that would occur during construction of the proposed Alder Subtransmission Source Line route. The reduction in travel on unpaved roads would result in approximately 40 fewer pounds of fugitive dust in the form of PM10 (see Draft EIR Appendix C, *Air Quality Calculations*). This is equal to a reduction of approximately 16 percent when compared to the peak daily construction PM10 emissions identified in Draft EIR Table 4.3-6 (p. 4.3-16).
- A-1.100 See MR1(A).
- A-1.101 See Response A-1.79.
- A-1.102 Consistent with Response A-1.18, the following is added to APM-BIO-02 on page 4.4-31 of the Draft EIR:

In lieu of developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation

bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition, and habitat types present are comparable to impacted habitat at the proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

A-1.103 Mitigation Measure 4.4-2 on page 4.4-35 of the Draft EIR (and shown in Table ES-1 on Draft EIR page ES-13) is revised as follows:

Mitigation Measure 4.4-2: SCE and/or its contractors shall avoid impacts to occupied Los Angeles pocket mouse habitat to the maximum extent feasible in the final Project design. SCE shall define Los Angeles pocket mouse habitat as “off limits” in construction plans and specifications. If complete avoidance is not feasible, mitigation measures shall be implemented to reduce potential project impacts within occupied habitat to the maximum extent feasible. Such measures could include minimizing that portion of the project footprint that could encroach on an occupied habitat area and staging materials and work so as not to encroach into such an area. The presence of a Biological Monitor during Project construction shall be required to ~~would~~ further ensure that any potential impacts to special-status wildlife species are avoided and minimized. For those impacts that cannot feasibly be avoided or further minimized, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project’s mitigation requirements.

A-1.104 The last sentence of the first paragraph under Impact 4.4-5 on page 4.4-37 of the Draft EIR is revised as follows:

~~Proposed construction at the existing Etiwanda Substation would not impact riparian habitat or other sensitive natural communities.~~ Construction of the subtransmission source line from the existing Etiwanda Substation would temporarily impact a small area of disturbed mule fat scrub that occurs in association with drainage depressions. Mule fat scrub often is considered sensitive by CDFG and impacts to this community may be subject to state regulation.

Additionally, the second sentence of the second bullet of Mitigation Measure 4.4-1 on page 4.4-33 of the Draft EIR is revised as follows:

Residual temporary impacts on disturbed mule fat scrub and undisturbed/disturbed Riversidean sage scrub shall be restored on site and/or mitigated at a replacement ratio of 1:1.

A-1.105 The last complete sentence on page 4.4-37 is revised as follows:

Construction at the existing Etiwanda Substation would temporarily impact two features totaling about 0.004 acre (180 sq. ft.) of waters of the U.S. and about

0.006 acre (260 sq. ft.) of waters of the state within the existing Etiwanda Substation (SCE, 2010, pg. 4.4-35; BonTerra, 2010e). Due to engineering restrictions and safety requirements regarding electrical clearances from adjacent power lines, avoidance of these features would not be feasible.

A-1.106 The meaning of the term “relocated” is sufficiently clear from the context provided in Draft EIR Section 4.5. Accordingly, the requested revision has not been made.

A-1.107 Mitigation Measure 4.5-3 on page 4.5-22 of the Draft EIR is revised as follows:

Mitigation Measure 4.5-3: If human remains are uncovered during Project construction, SCE and/or its contractors shall immediately halt all work; in the immediate vicinity, and SCE’s archaeologist or cultural resources consultant shall contact the county coroner to evaluate the remains; and shall follow the procedures and protocols set forth in CEQA Guidelines §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 Health and Safety Code §7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 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 the SCE archaeologist and/or its cultural resources contractor has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely descendents regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

A-1.108 See Response A-1.79.

A-1.109 See Response A-1.79.

A-1.110 See Response A-1.79.

A-1.111 See Response A-1.79.

A-1.112 Although the SCAQMD GHG significance threshold of 10,000 metric tons CO₂e per year for stationary/industrial sources is considered interim, it is not draft. The following edits have been made to the first two sentences in Section 4.8.4, *Approach to Analysis*, on Draft EIR page 4.8-6 to clarify that the adopted screening threshold is considered interim.

This analysis uses an approach for the determination of significance of GHG emissions based on the interim GHG significance thresholds adopted by the *South Coast Air Quality Management District (SCAQMD)*. The SCAQMD has adopted an interim operational screening significance threshold of 10,000 metric tons CO₂e per year for stationary/industrial sources (SCAQMD, 2008).

A-1.113 See MR1(A).

A-1.114 The first sentence on page 4.9-5 of the Draft EIR is revised as follows:

The Project would remove ~~28~~ 37 existing wood poles.

A-1.115 Despite the editorial error, the number of preschool and day-care facilities within 0.25 mile of the Project is clear from the bullet point list provided on Draft EIR page 4.9-9. Nonetheless, for internal consistency, the second sentence on page 4.9-9 of the Draft EIR is revised as follows:

~~Four~~ Five public or private preschool and day-care centers were identified within 0.25 mile of the Project (SCE, 2010):

A-1.116 Comment noted. Although the agency's name change does not affect the adequacy or accuracy of the Draft EIR's analysis of environmental effects, the third sentence under "Hazardous Materials Emergency Response" on page 4.9-13 of the Draft EIR is revised as follows:

The plan is administered by the California Emergency Management Agency (Cal-EMA) ~~State Office of Emergency Services (OES)~~. The Cal-EMA OES coordinates the responses of other agencies, including the USEPA, CHP, CDFG, the RWQCBs, the local air districts (in this case, the SCAQMD), and local agencies.

A-1.117 The following sentence in the first paragraph under Impact 4.9-1 on Draft EIR page 4.9-18 has been revised to clarify that RWQCB would not review or approve the Project SWPPP.

Among other things, the WEAP would provide instructions for implementation of the Project SWPPP, including site-specific BMPs required by the ~~RWQCB through its review and approval of the SWPPP~~, the location of the MSDS, and notification procedures in the event of a spill, leak, or discovery of soil contamination.

A-1.118 See Response A-1.40.

A-1.119 The following sentence in the first paragraph under Impact 4.9-3 on Draft EIR page 4.9-22 has been revised to clarify that RWQCB would not review or approve the Project SWPPP.

Standard construction water quality BMPs required by the ~~RWQCB through its review and approval of the SWPPP~~ include measures for the safe handling and storage of hazardous materials used during construction to prevent a release and methods to contain any such release if it should occur.

A-1.120 The San Bernardino County Fire Department (SBCFD) did not provide any site-specific recommendations for this Project. Regardless, the bullet includes language to ensure that the provisions identified can be changed by the applicable fire jurisdiction if necessary.

The commenter also asks for clarification on the training that would be required for SCE personnel relative to the size of the fire. The referenced requirement (bullet 3) is for SCE workers and personnel to receive training on the proper use of fire-fighting equipment and the procedures to be followed in the event of a fire. The training itself would distinguish between the procedures to be followed in the event of a small fire and those to be followed in the event of a large one. No revisions to Mitigation Measure 4.9-6 are necessary.

A-1.121 See MR1.

A-1.122 See MR1.

A-1.123 See MR1, which describes ongoing remediation activities on the Goodrich site and, together with the Draft EIR, identifies what mitigation measures would be required if Alternative 1 were approved. CEQA considers the effects of a proposed project and alternatives on the existing environment. The fact that multiple federal and state agencies, including the EPA, are coordinating with respect to the existing groundwater remediation effort for the Goodrich site has no effect on the efficacy of the Health and Safety Plan that would be required by Mitigation Measure 4.9-1.

A-1.124 “Construction General Permit” on page 4.10-11 of the Draft EIR is revised as follows:

Construction General Permit (SWRCB Order 2009-0009-DWQ as amended by 2010-0014-DWQ).

A-1.125 Correction noted. References in the Draft EIR to “General Construction” Permit are understood to refer to the Construction General Permit. This clarification does not affect the adequacy or accuracy of the environmental analysis in the EIR, and so the document has not been revised in response to this comment.

A-1.126 The fourth and fifth sentences of the third paragraph on page 4.10-18 of the Draft EIR are revised as follows:

Permit requirements would include the preparation of a SWPPP or multiple SWPPPs, implementation and monitoring of BMPs, implementation of best available technology (BAT) for toxic and non-conventional pollutants, implementation of best conventional technology (BCT) for conventional pollutants, and periodic submittal of performance summaries and reports ~~to the Santa Ana RWQCB~~. The SWPPP(s) ~~would apply to the Project as a whole~~ would include reference to the major construction areas, such as the proposed Falcon Ridge

Substation, materials staging areas, and underground work associated with telecommunications facilities and relocation of existing transmission poles.

A-1.127 See Response A-1.126.

A-1.128 See Response A-1.40.

A-1.129 See MR1.

A-1.130 See Response A-1.79.

A-1.131 In response to this comment and in reflection of the clarified maps of the ROW areas provided by SCE, the second and third sentences of the last paragraph on page 4.11-4 of the Draft EIR are revised as follows:

The subtransmission source line route would be within the existing SCE ROW, delineated as *P-UC* on the city's land use map and not included in the specific plan areas, with the exception of: 1) the portion that would divert from SCE's ROW and extend east parallel to South Highland Avenue to San Sevaine Road, then extend north paralleling San Sevaine Road and spanning the 210 Freeway until reentering SCE's ROW; and 2) approximately 0.5 mile between Cypress Street and the proposed Falcon Ridge Substation location through the Summit at Rosena Specific Plan area, where SCE's existing rights would be upgraded. These ~~This~~ portions would be located within areas of *RMU* and *R-PC* designation within the West Gate Specific Plan and Summit at Rosena Specific Plan, which ~~that~~ are not yet built out (City of Fontana 1996, 2011a-f).

A-1.132 The last sentence on page 4.11-10 of the Draft EIR is revised as follows:

While the proposed Etiwanda Subtransmission Source Line route and proposed telecommunication facilities would cross through existing residential communities in the City of Fontana, the portions of the route that would traverse these communities would be primarily within the existing SCE ROW and these facilities would not restrict access or constitute a physical barrier to these communities.

A-1.133 See Response A-1.79.

A-1.134 The second paragraph under "Regulatory Context" on page 4.13-7 of the Draft EIR clearly states the applicability of land use regulations (which include noise ordinances) as follows: "CPUC General Order No. 131-D explains that local land use regulations would not apply to the Project and alternatives." Therefore, it is not necessary to precede any mention of policies or codes by "non-binding."

A-1.135 See Response A-1.134.

A-1.136 The San Bernardino County Code discussion on Draft EIR page 4.13-8 has been revised as follows to include San Bernardino County's stationary noise source limits:

San Bernardino County regulates noise with County Code §83.01.080, *Noise*. The interior L_{dn} noise level limit for mobile noise sources adjacent to noise-sensitive uses, such as residences, is 45 dB and the interior L_{dn} noise level limit is 60 dB. Noise from stationary sources at receiving residential land uses is limited to 55 dB L_{eq} from 7:00 a.m. to 10:00 p.m. and 45 dB L_{eq} from 10:00 p.m. to 7:00 a.m. Temporary construction, maintenance, repair, or demolition activities are exempt if they occur between 7:00 a.m. and 7:00 p.m., except on Sundays and Federal holidays (San Bernardino County, 2007b).

A-1.137 See Response A-1.134.

A-1.138 See Response A-1.134.

A-1.139 See Response A-1.134.

A-1.140 See Response A-1.134.

A-1.141 The City of Rialto Municipal Code discussion on Draft EIR page 4.13-9 has been revised as follows to include the exemption related to public utilities subject to the regulatory jurisdiction of the CPUC:

Construction activities under the Project are exempt from the provisions of Chapter 9.50 of the City of Rialto Municipal Code.

- **§9.50.060, Exemptions.** The following activities and noise sources shall be exempt from the provisions of this chapter:

K. Construction, operation, maintenance and repairs of equipment, apparatus or facilities of park and recreation departments, public work projects or essential public services and facilities, including trash collection and those of public utilities subject to the regulatory jurisdiction of the California Public Utilities Commission.

~~L. Construction, repair, or excavation work performed pursuant to a valid written agreement with the city or any of its political subdivisions which agreement provides for noise mitigation measures.~~

A-1.142 See Response A-1.134.

A-1.143 See Response A-1.134.

A-1.144 The first paragraph in Section 4.12.4 on Draft EIR page 4.13-12 has been revised as follows to acknowledge the City of Rialto’s exemption related to public utilities subject to the regulatory jurisdiction of the CPUC:

In addition to the fact that construction activities in unincorporated San Bernardino County and the cities of Fontana and Rialto are exempt from the noise regulation provisions in their codes if the construction activities occur during the hours presented in **Table 4.13-3**, it also should be noted that as a utility project subject to the regulatory jurisdiction of the CPUC, any work associated with the Project in the City of Rialto also would be exempt from otherwise applicable noise control regulations contained in Chapter 9.50 of the city’s municipal code. ~~Construction activities in unincorporated San Bernardino County and the cities of Fontana and Rialto are exempt from the noise regulation provisions in their code if the construction activities occur during the hours presented in **Table 4.13-3**.~~ Construction activities are allowed within the City of Rancho Cucamonga during the hours presented in Table 4.13-3, and must also comply with noise exposure limits (see Impact 4.13-2 discussion). Construction activities would not be allowed on Sundays or national holidays within any jurisdiction in the study area.

A-1.145 Table 4.13-3 on Draft EIR page 4.13-13 has been revised as follows to acknowledge the City of Rialto’s exemption related to public utilities subject to the regulatory jurisdiction of the CPUC:

**TABLE 4.13-3
LOCAL JURISDICTIONS-PERMITTED HOURS FOR CONSTRUCTION WORK**

City/County	Permitted Hours		
	Monday-Friday	Saturday	Sunday and Holidays
San Bernardino County	7:00 a.m. - 7:00 p.m.	7:00 a.m. - 7:00 p.m.	None
City of Fontana	7:00 a.m. - 6:00 p.m.	8:00 a.m. - 5:00 p.m.	None
City of Rialto (Oct.-Apr)*	7:00 a.m. - 5:30 p.m.	8:00 a.m. - 5:00 p.m.	None
City of Rialto (May-Sep)*	6:00 a.m. - 7:00 p.m.	8:00 a.m. - 5:00 p.m.	None
City of Rancho Cucamonga**	6:30 a.m. - 8:00 p.m.	6:30 a.m. - 8:00 p.m.	None

* Although these regulations are applicable to construction work in general, as a utility, all SCE utility project work activities are exempt from all timing requirements under the City of Rialto’s Municipal Code.

** Construction noise exposure shall not exceed 65 dB L₂₅, 70 dB L₁₇, 79 dB L₈, or 80 dB L_{max} at noise-sensitive property lines (e.g., residential property lines).

SOURCES: San Bernardino County, 2007b; City of Fontana, 2007; City of Rialto, 2008; and City of Rancho Cucamonga, 1983

A-1.146 Although its decision-making authority over the Project is not bound by local agency noise ordinance restrictions, the CPUC has elected to analyze the significance of Project-related noise effects relative to standards that otherwise apply in the Project area (see the

discussion of the “Approach to Analysis” provided on Draft EIR, p. 4.13-12). As a result, the conclusion of analysis of Impact 4.13-1 (Draft EIR, p. 4.13-13) was that construction noise would violate the City of Rancho Cucamonga’s exterior noise standards, and so cause a significant unavoidable impact. CEQA Guidelines section 15126.4(a)(1) obligates the CPUC to describe feasible measures that could minimize significant adverse impacts. Although Mitigation Measure 4.13-1 would not avoid or reduce the impact to a less-than-significant level, it would minimize the impact by reducing noise levels by at least 5 dB. Therefore, Mitigation Measure 4.13-1 has not been deleted.

The commenter indicates that implementation of a noise mitigation measure that would not achieve a noticeable change of 5 dBA (i.e., one that would achieve a change of less than 5 dBA) should not be implemented. However, as indicated on Draft EIR page 4.13-15, implementation of Mitigation Measure 4.13-1 would achieve a noise reduction of *at least* 5 dBA (i.e., equal to or greater than 5 dBA). Therefore, implementation of Mitigation Measure 4.13-1 would achieve a noticeable reduction in noise and so, based on the commenter’s own criteria, should be implemented.

No data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts is offered to substantiate the commenter’s suggestion that installation and removal of noise barriers could take longer and produce as many or more noise impacts than construction of the proposed 66 kV subtransmission source lines. Pursuant to Mitigation Measure 4.13-1, the shields used during linear construction activities would be required to be readily removable and moveable so they may be repositioned, as necessary. In addition, positioning of noise shields would not involve the same intense construction activities (e.g., clearing, auguring, etc.) that generate elevated noise levels as would be required to construct the subtransmission source lines. Accordingly, Mitigation Measure 4.13-1 has not been deleted in response to this comment.

- A-1.147 The paragraph that precedes Mitigation Measure 4.13-5 on Draft EIR page 4.13-19 has been revised as follows to clarify the basis relied upon in the Draft EIR to recommend the mitigation measure:

Although construction activities generally would occur during daytime hours, there remains a possibility that some limited nighttime construction work could be required. As described above, construction activity noise levels could be up to 84 dBA at the closest residences, and average hourly nighttime noise levels in the Project area have been measured to be as low as 43 dBA (see Table 4.13-1). At 1,000 feet from construction activity at the substation site, the maximum noise level would be up to approximately 51 dBA. Therefore, at this distance and beyond, the increase in nighttime noise level would be expected to be less than 10 dBA. Because a 10 dBA change subjectively is heard as approximately a doubling in loudness and can cause an adverse response, it is assumed that nighttime construction activity noise 1,000 feet or farther from an active construction area would not cause a significant effect on residential sensitive

receptors. Therefore, ~~In addition,~~ implementation of Mitigation Measure 4.13-5 would ensure that construction activities outside of permitted hours (Table 4.13-3) would be mitigated to a less-than-significant level by reducing the noise audible at residences within 1,000 feet of nighttime construction activities.

A-1.148 The last sentence of the first paragraph on Draft EIR page 4.14-3 is revised as follows:

Because of the requirements of Senate Bill (SB) 375, SCAG is preparing the next RHNA planning cycle which will cover ~~January 1, 2011~~ October 1, 2013 to September 30, 2021 (SCAG, 2011b).

A-1.149 See Response A-1.79, which addresses this issue the context of Land Use and Planning, and Response A-1.134, which addresses this issue in the context of noise. The same rationale for not making the requested change applies regardless of the specific resource area.

A-1.150 See Response A-1.149.

A-1.151 See Response A-1.149.

A-1.152 See Response A-1.149.

A-1.153 The footnote on page 4.15-10 of the Draft EIR is revised to correct the editorial error in identifying the county. In addition, while there were 242,985 households *with their own* children under the age of 18 in San Bernardino County in 2010, there were a total of 283,252 households with *any* children under the age of 18. The total population under 18 also was slightly higher than previously reported: a total of 664,577 children instead of 594,588. This results in a slightly lower average number of children per household with children present and a slightly lower increase in the number of potential students. Even with a slightly higher number of potential Project-related students, the analysis concluded that no impact would result with respect to the provision of new or physically altered school facilities. Regardless, for accuracy, footnote 1 on Draft EIR page 4.15-10 has been revised as follows:

In ~~San Bernardino~~ Riverside County in 2010, ~~283, 252~~242,985 households had children under the age of 18, and the total county population of children under the age of 18 was ~~664,577~~594,588 (U.S. Census Bureau, 2010). This gives a rough average of ~~2.45~~ children per household with children present. Assuming each of the 90 temporary construction workers represented one average household with children, this could result in an increase of ~~216~~225 children in the service areas of the Rialto Unified, Etiwanda, or Fontana Unified school districts.

A-1.154 See Response A-1.149.

A-1.155 See Response A-1.149.

A-1.156 See Response A-1.149.

A-1.157 See Response A-1.149.

A-1.158 The portion of the last paragraph on Draft EIR page 4.16-7 that carries over to the top of page 4.16-8 discloses that the proposed Etiwanda Subtransmission Source Line and Fiber-Optic Cable Route ROW would traverse Fontana Park, separate Rosena Park East and Rosena Park West, and be adjacent to a landscaped recreational path that runs adjacent to the Heritage neighborhood in Fontana. It is revised as follows to clarify of the work that would occur within SCE's ROW:

~~Both the subtransmission line and fiber optic cable would be strung along existing aboveground structures in these portions of the alignment, and no new wood poles, TSPs, or other structures would be constructed within these portions of the ROW. Therefore, no ground-disturbing construction activities would take place within these segments of the ROW.~~ New subtransmission poles and access roads would be located within these portions of the ROW. However, and Project construction of access roads and new poles would not contribute to or accelerate the substantial physical deterioration of these facilities, and this impact would be less than significant.

SCE anticipates a total of approximately 90 construction personnel to be working on any given day during the 12-month construction period, and it is expected that area parks and other recreational facilities have capacity to serve associated recreational demands (see Draft EIR page 4.16-7). The clarification of activities to occur in the ROW within and near Fontana Park, Rosena Park East, Rosena Park West, and the Heritage neighborhood pathway would not increase the use of these existing recreational areas beyond the level analyzed in the Draft EIR. To be clear, significance criterion a) in Draft EIR Section 4.16, *Recreation*, asks whether a proposed project would cause an increase in use of existing neighborhood and regional parks and other recreational facilities – use that would cause substantial deterioration of the facilities to occur or be accelerated and thereby necessitate rehabilitation, replacement, or other work to occur to address the deterioration. The clarification of activities to occur in the ROW would not affect the number of workers who could use park or recreational facilities, the duration of construction, or otherwise affect the analysis of potential impacts related to Recreation significance criterion a). Therefore, regardless of the clarification, the analysis in Draft EIR Section 4.16 remains accurate.

A-1.159 Temporary construction-related closures of park and recreational facilities could cause secondary environmental effects on traffic, fuel consumption, vehicle emission-related air quality, and other resources. If people travel to a specific location for recreational purposes and then must travel to one or more other locations to accomplish the original purpose, then potential significant impacts would be created that could have been avoided with advance notice. The type of coordination and noticing contemplated by Mitigation Measure 4.16-1 would reduce these impacts to a less-than-significant level.

To the extent that the requirements of Mitigation Measures 4.16-1 and 4.17-1 overlap, if at all, duplication of effort would not be required.

A-1.160 The roadways associated with Alternative 1 are listed in Draft EIR Section 3.4.1 on page 3-11.

A-1.161 See Response A-1.149.

A-1.162 See Response A-1.149.

A-1.163 See Response A-1.149.

A-1.164 See Response A-1.149.

A-1.165 See Response A-1.149.

A-1.166 The requested revision does not affect the adequacy or accuracy of the Draft EIR's environmental impact analysis, and so has not been made.

A-1.167 See Response A-1.53.

A-1.168 The second sentence of the second paragraph on Draft EIR page 4.17-16 is revised to correct this editorial error as follows:

Therefore, Mitigation Measures 4.17-1 ~~and 4.17-2~~ identified for the Project would also be required for this alternative.

A-1.169 For accuracy and to maintain internal consistency, the third paragraph on page 4.18-8 of the Draft EIR is revised as follows:

Construction of the proposed subtransmission source line ~~routes would span drainages, but SCE does not anticipate placing structures within drainages~~ would require construction activities to be conducted in an existing drainage outside of Etiwanda Substation, as explained and analyzed in Section 4.4, *Biological Resources*. The proposed telecommunications facilities and proposed distribution getaways would not add any new aboveground structures, as the telecommunication facilities are proposed to be located on the new subtransmission poles. Maintenance of these structures would also not affect drainage. Therefore, construction, operation, and maintenance would not alter existing drainage patterns or stormwater runoff.

A-1.170 The Project Description is clear that work durations are estimates. See, for example, Draft EIR Table 2-6, *Construction Equipment and Workforce Estimates*, which includes the approximate number of days required for particular activities, and Draft EIR Section 2.12 (p. 2-44), which states, "...construction of the Project would take approximately 12 months." This understanding is consistent with the resource analysis.

See, for example, Draft EIR Section 4.1, *Aesthetics* (pp. 4.1-25, 4.1-31, 4.1-33); Section 4.8, *Greenhouse Gas Emissions* (p. 4.8-7); Section 4.9, *Hazards and Hazardous Materials* (p. 4.9-18); Section 4.14, *Population and Housing* (p. 4.14-5); Section 4.15, *Public Services* (pp. 4.15-8, 4.15-9, 4.15-10); and Section 4.17, *Transportation and Traffic* (p. 4.17-7), all of which explicitly state that the anticipated construction period is approximately 12 months. In fact, the Draft EIR recognizes that the 12-month estimated construction period is an approximation in the context of utilities (Draft EIR, p. 6-21). Many factors, including those cited, could affect the precise number of days required for construction. The requested revision has not been made.

A-1.171 See Response A-1.35.

A-1.172 Consistent with Response A-1.172, the first sentence under Impact 4.18-4 on page 4.18-10 of the Draft EIR is revised as follows:

As described in Chapter 2, *Project Description*, the Project would require the removal and disposal of approximately 37 ~~25~~ existing wood poles.

A-1.173 See Responses A-1.83 and A-1.85.

A-1.174 See Responses A-1.83 and A-1.85.

A-1.175 See Responses A-1.83 and A-1.85.

A-1.176 See MR1.

A-1.177 See MR1.

A-1.178 See MR1.

A-1.179 See MR1.

A-1.180 See MR1.

A-1.181 See MR1.

A-1.182 As explained in Draft EIR Section 6.1 (p. 6-1), the cumulative effects analysis relies on a blend of two approaches to analyze cumulative effects: the “list-of-projects” approach and the “summary of projections” approach. As noted, the impacts of projects must overlap in time as well as geographically before they could accumulate with the incremental impacts of the Project to cause cumulative effects. Projects were included on the list provided in Draft EIR Table 6-1 (p. 6-4) based on communications with local agencies in the vicinity of the Project that occurred around the time that the NOP was issued for the Project. Table 6.1 on page 6-7 of SCE’s PEA identifies five Applicant-sponsored projects as potential cumulative projects.

The first two projects are described in SCE's PEA as "Alder-Declez 66-kilvolt (kV) bundle 5,500-foot of 1,750 underground cable 2010/2011" and "Etiwanda-Alder-Randall 66-kV reconductor & re-build three miles of 653 ACSR to 954 SAC from Etiwanda to Baseline Road" (SCE, 2010).²² Neither of these was included in the cumulative effects analysis of the Draft EIR because the construction of both was projected to be complete before construction of the Project was expected to begin: SCE estimated that the first project would be complete in 2010/2011 and the second would be complete in 2012. By contrast, SCE anticipated that construction of the Falcon Ridge Substation Project would not begin until 2013. Consequently, there was no chance that the impacts of these two projects could overlap temporally with those of the Project.

The remaining three projects identified by SCE in its PEA involve work at the Etiwanda Substation. Of these, the first involves the relocation of lines from the east bus to the west bus, the second involves the construction of a new subtransmission source line segment that would connect the Etiwanda and Genamic substations and related work, and the third involves the addition of a new transformer at the Etiwanda Substation. These projects could cause air quality and other impacts similar to those of the Project that could overlap with the environmental effects of the Project. The potential for cumulative effects to result was analyzed in PEA Section 6.0. The EIR preparers have reviewed the analysis provided in the PEA and independently agree that the addition of the three SCE-proposed projects to the EIR's cumulative analysis does not result in new or different impacts relative to those identified in the Draft EIR.

A-1.183 See Responses A-1.83 and A-1.85.

A-1.184 See Responses A-1.83 and A-1.85.

A-1.185 To clarify, Mitigation Measure CUMULATIVE-TRANS would require SCE to prepare a draft transportation management plan that meets the minimum requirements identified in the mitigation measure and submit it to the affected cities and County so that those local agencies can review it to determine whether any adjustments are necessary to avoid or reduce significant adverse cumulative effects that could occur if other projects' transportation and traffic impacts would overlap geographically and temporally with those of the Project. If no input is received from one or more of those agencies within a reasonable time, then SCE would document its efforts to work with the agency or agencies and, thereby, would satisfy its obligations under Mitigation Measure CUMULATIVE-TRANS. If input is received from one or more of the local agencies, then SCE would make a reasonable good faith effort to integrate and accommodate reasonable requests to modify the plan. It would be incumbent upon the affected local agencies, not SCE, to work with other projects' proponents. Any overlap of requirements with Mitigation Measure 4.17-1 would not require duplication of effort.

²² SCE, 2010. Proponents Environmental Assessment. Falcon Ridge Substation Project. December 29, 2010.

A-1.186 The Mitigation Monitoring, Reporting and Compliance Program has been revised as indicated in these responses to comments. See Appendix H.

DEPARTMENT OF TRANSPORTATION

DISTRICT 8

PLANNING

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*Flex your power!
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February 1, 2012

Mr. John Boccio
c/o Environmental Science Associates
225 Bush Street, Suite # 1700
San Francisco, CA94104

Sub: Falcon Ridge Substation Project, SBD-15-PM 13.583

Dear Mr. Boccio,

We have completed our review for the Draft Environmental Impact Report (DEIR) for the Falcon Ridge Substation Project. We do not anticipate this project will generate any additional traffic to the State Highway System (SHS). We therefore have no comments at this time.

If this project is later modified in any way, please forward copies of revised plans as necessary so that we may evaluate all proposed changes for potential impacts to the SHS.

If you have any questions regarding this letter, please contact Harish Rastogi at (909) 383-6908 or myself at (909) 383-4557 for assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel Kopulsky".

DANIEL KOPULSKY

Office Chief

Community Planning/IGR-CEQA

B-1.1

2.6.2 Letter B-1 - Responses to Comments from California Department of Transportation (Caltrans)

B-1.1 Comment acknowledged, no response required.



Department of Toxic Substances Control

Matthew Rodriguez
Secretary for
Environmental Protection

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

Edmund G. Brown Jr.
Governor

February 15, 2012

Mr. John Boccio
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

**NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE FALCON RIDGE SUBSTATION PROJECT (SCH #2011041009), SAN
BERNARDINO COUNTY**

Dear Mr. Boccio:

The Department of Toxic Substances Control (DTSC) has received your submitted Draft Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document: "Southern California Edison (SCE) proposes to construct, operate, and maintain a 66/12kV unattended, automated, 56 megavolt-ampere (MVA) low-profile substation (the Falcon Ridge Substation) on an approximately 2.7 acres located just south of Casa Grande Avenue, east of Sierra Avenue, north of Summit Avenue and adjacent to SCE's existing transmission right of way (ROW), in the City of Fontana, California. Approximately four existing sub-transmission poles would be removed and a combination of new poles and underground distribution facilities would be constructed. The Project is located in the cities of Rancho Cucamonga, Rialto, Fontana, and a portion of unincorporated san Bernardino County. Land use in the Project area is a mix of industrial, commercial and residential uses; historical land use included agricultural activities".

Based on the review of the submitted document DTSC has the following comments:

- 1) The EIR should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
 - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

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B-2.1
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- Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.

3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.



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B-2.2

B-2.3

- 4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies. B-2.4
- 5) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination. B-2.5
- 6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment. B-2.6
- 7) If the site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. B-2.7
- 8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. B-2.8
- 9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see B-2.9

Mr. John Boccio
February 15, 2012
Page 4

www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

- 10) Also, in future CEQA documents, please provide your e-mail address, so DTSC can send you the comments both electronically and by mail.

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov, or by phone at (714) 484-5491.

Sincerely,



Greg Holmes
Unit Chief
Brownfields and Environmental Restoration Program

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

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

CEQA # 3464

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B-2.9
(cont.)

2.6.3 Letter B-2 – Responses to Comments from California Department of Toxic Substances Control (DTSC)

- B-2.1 The Draft EIR evaluates whether implementation of the Project could pose a threat to human health or the environment. For example, Draft EIR Section 4.3, *Air Quality*, considers whether Project-related air pollutants would result in a violation of an air quality standard designed to protect human health and/or the environment, as well as whether the Project would expose people to substantial pollutant concentrations. Further, as explained in Draft EIR Section 4.9, *Hazards and Hazardous Materials*, the term “hazardous materials” is defined expressly with human health and environmental considerations in mind (see Draft EIR, page 4.9-1). Several of the agency databases identified in the comment informed the analysis in the Draft EIR, including DTSC’s EnviroStor database as well as GeoTracker, the NPL, and CERCLIS (see Draft EIR pages 4.9-1, 4.9-2, 4.9-3, 4.9-4, 4.9-10, and 4.9-28).
- B-2.2 The existing environmental setting with respect to hazardous materials-related site conditions is described in Draft EIR Section 4.9 starting on page 4.9-2. As explained therein, soil sampling and chemical analysis were performed to evaluate the disposal requirements of soil excavated for the construction of the proposed substation. Soil samples from five soil borings were collected at various depths up to 10 feet below ground surface and submitted for laboratory analysis of Total Petroleum Hydrocarbons (TPH), polychlorinated biphenyls (PCBs), and California Code of Regulations Title 22 metals. Laboratory results reported that TPH and PCBs were not detected in any of the samples, and metal detections were well below the thresholds for hazardous waste classification.

In addition, agency database searches were conducted to identify hazardous materials sites that would be within 0.25 mile of all Project facilities. See also Draft EIR Figure 4.9-1 (page 4.9-3), which shows the locations of identified hazardous materials sites in the vicinity of the Project. Because there are no hazardous materials sites within the Project footprint (either the substation site or within the linear right-of-way), it is not expected that further investigation or remediation would be necessary (Draft EIR Section 4.9.4, page 4.9-22). In the event that unanticipated conditions are discovered during the construction, operation, or maintenance of the Project that necessitate remediation, DTSC’s authority to investigate and oversee such efforts independent of the CPUC’s environmental review process is described in the Draft EIR on page 4.9-12, which states: “DTSC has primary hazardous material regulatory responsibility, but can delegate enforcement responsibilities to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the HWCL.”

- B-2.3 Sampling, analysis, and research regarding any hazardous conditions on the Project site are summarized in Response B-2.2. TPH and PCBs were not detected in any of the samples, and metal detections were well below the thresholds for hazardous waste classification. Thus, closure, certification, or remediation approval reports were not required.

- B-2.4 The Project, as described in Draft EIR Chapter 2, would not include the demolition of buildings, other structures, asphalt, or concrete-paved surfaces.
- B-2.5 As noted in Response B-2.2, existing contaminated soils were not identified during testing or research and are not expected to be disturbed by Project activities. If contaminated soils are later identified, applicable laws would govern treatment, storage, and disposal activities. Draft EIR Table 2-4 (page 2-25) discloses that approximately 120,000 square feet (5,000 yards) of material would be imported for the Project. See also page 2-26, which explains that clean fill or crushed rock also could be used as backfill during the erection of wood or lightweight steel holes. As would be required by Mitigation Measure 4.9-1 (page 4.9-20), SCE and/or its contractors shall prepare and implement a Health and Safety Plan in accordance with applicable regulations prior to construction. The Health and Safety Plan shall identify the chemicals potentially present in soil, health and safety hazards associated with those chemicals, monitoring to be performed during site activities, soil handling methods required to minimize the potential for harmful exposures, appropriate personnel protective equipment, and emergency response procedures. The plan shall be submitted to the CPUC for approval prior to commencement of construction activities and shall be distributed to all construction crew members prior to construction and operation of the Project. As described in the context of Impact 4.9-2 (Draft EIR, page 4.9-21), construction worker training under the WEAP would provide site personnel with instruction on the notification procedures to be followed in the event that soil contamination is discovered. Because the implementation of these actions would assure that imported soil would not cause or contribute to a significant impact related to contamination, no additional actions are required.
- B-2.6 As indicated in Response B-2.4, no demolition is planned. Human health and the environment would be protected during construction activities. Potential air quality-related impacts (including human health impacts) to sensitive receptors during construction are analyzed in Draft EIR Section 4.3, *Air Quality* (see, e.g., page 4.3-19 et seq.) and noise-related impacts to sensitive receptors are addressed in Section 4.13, *Noise* (see page 4.13-12 et seq.).

Health risk assessments (HRAs) determine the exposure of sensitive receptors to environmental pollutants, such as toxic air contaminant (TAC) emissions. They generally are based on a 70-year exposure period when assessing diesel particulate matter and other TACs that have only cancer or chronic non-cancer health effects; however, it is appropriate to limit an HRA to the duration of the emission-producing activities. For this Project, DPM emissions would occur only over the 12-month construction period. As shown in Table 4.3-8 (Draft EIR, page 4.3-20), maximum PM_{2.5} emissions from on-site equipment for the Project would be up to 10 pounds per day. The health risk over a 70-year exposure period from short-term Project DPM emissions would be negligible. A separate HRA for TAC emissions has not been determined to be necessary. An HRA relative to groundwater or soil contamination would not be necessary for the Project based on the apparent lack of contamination at the Project sites and routes, and would not be required for Alternative 1 for the reasons discussed in MR1.

B-2.7 For the reasons explained in Response B-2.2, no additional investigation or remediation has been determined to be necessary.

B-2.8 Comment noted. The regulatory setting, including summaries of the Hazardous Waste Control Law and its implementing regulations and the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, are provided in Draft EIR Section 4.9.1 (page 4.9-10 et seq.). If it is determined that the Project would trigger hazardous waste permitting requirements, then the Project Applicant would be subject to them.

B-2.9 Comment noted.



Department of Fish and Game
Inland Deserts Region
3602 Inland Empire Blvd., Suite C220/200
Ontario, CA 91764
(909) 484-0167 – Public Information
(909) 481-2945 – FAX

FAX COVER SHEET

Date: 3-12-2012

To: JOHN BOCCIO

Pages: Cover & _____

Agency: CPUC

Phone No. () _____

Phone No. () _____

FAX No. (415) 896-5900

From: _____

Comments: Comment letter for Falcon Ridge



California Natural Resources Agency
DEPARTMENT OF FISH AND GAME

EDMUND G. BROWN JR., Governor
Charlton H. Bonham, Director



<http://www.dfg.ca.gov>
Inland Deserts Region
3602 Inland Empire Blvd., Suite C-200
Ontario, CA 91764
(909) 484-0167

March 9, 2012

John Boccio
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: Draft Environmental Impact Report for the Falcon Ridge Substation Project
SCH No. 2011041009

Dear Mr. Boccio:

The Department of Fish and Game (Department) appreciates this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Falcon Ridge Substation project. The Department is responding as a Trustee Agency for fish and wildlife resources [Fish and Game Code sections 711.7 and 1802 and the California Environmental Quality Act Guidelines (CEQA) section 15386] and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines section 15381), such as a Lake and Streambed Alteration Agreement (Section 1600 *et seq.*) or a California Endangered Species Incidental Take Permit (Fish and Game Code Sections 2080 and 2080.1).

For this project the Department will be acting as a Trustee and Responsible Agency. As per Section 15096 of the California Environmental Quality Act statute, as a Responsible Agency the Department is obligated to focus its comments on any shortcomings in the CEQA document, the appropriateness of the CEQA document utilized, and additional alternatives or mitigation measures which the CEQA document should include.

The proposed project consists of a 66/12 kV unattended, automated, 56 megavolt-ampere (MVA) substation on 2.7 acres and the installation of two sub-transmission source line segments, five underground vaults, fiber-optic infrastructure work and upgrades to existing communications equipment. The proposed sub-transmission line begins at the Alder Substation, goes to the proposed Falcon Ridge Substation and ends at the Etiwanda Substation. The project is located in the City of Fontana south of Casa Grande Avenue, east of Sierra Avenue, north of Summit Avenue and adjacent to Southern California Edison's (SCE) transmission right-of-way (ROW).

Impacts to Species

Special-status plant surveys were conducted in 2011. In the FEIR, please state whether the vegetation surveys were conducted in accordance following the Department's November 2009 guidance for Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. If the Department guidelines were not utilized surveys conducted after the 2009 issuance of the guidelines should be updated to incorporate the guidelines. The guidance document can be found at the following link:

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Draft Environmental Impact Report for the Falcon Ridge Substation Project
California Public Utilities Commission for Southern California Edison
County of San Bernardino -- SCH 2011041009
Page 2 of 3

B-3

http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/Protocols_for_Surveying_and_Evaluating_Impacts.pdf

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(cont.)

Habitat assessments that identify the possibility of listed, threatened or endangered plants or animals should also provide the results of any focus surveys in the CEQA document. CEQA documents that rely on future surveys or regulatory compliance (with the exception of pre-construction surveys for burrowing owl or bird nests) as mitigation may not satisfy the Department's obligations under CEQA and may require future supplemental documents processed via CEQA.

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B-3.2

Species with a high or moderate potential to occur in the project area include: the Coast horned lizard, coast patch-nosed snake, grasshopper sparrow, golden eagle, northern harrier, white-tailed kite, loggerhead shrike, Los Angeles pocket mouse (LAPM), Northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, American badger, Plummer's mariposa lily, and Parry's spineflower.

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Habitat occupied by the LAPM will be impacted. Other impacts include: 4.67 acres at Falcon Ridge Substation, two acres at the Falcon Ridge staging area, 3.0 acres at the Etiwanda staging area and 3.55 acres for the sub-transmission lines. The figures for impacts to Riversidean alluvial fan sage scrub along the sub-transmission line are not quantified because much of it will be avoided.

Department Concerns

Wherever possible the information requested below should be included in the FEIR. The Department recommends the following:

1. The Lead Agency should supply a copy of the biological surveys in the FEIR, including a vegetation map;
2. The Lead Agency should provide the qualitative and quantitative basis for designating habitat as disturbed and not disturbed;
3. A discussion in the FEIR that the project is or is not in conformance with the Department's 2009 vegetation survey guidelines. If not in conformance, the Lead Agency shall revisit the vegetation surveys and bring the survey data into compliance with the 2009 guidelines;
4. Included in the monitoring and management plan what measures the project will take to implement the guidelines for avian protection on power lines;
5. A table showing total acreage of habitats in the project area and an assessment of how much habitat will be impacted;
6. A breakdown on the acreage impact figures for RAFSS/RSS and the mitigation ratio per acre of impacted habitat;
7. Submittal of a Lake and Streambed Alteration Agreement Notification.

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Streambed Alteration Agreements and CEQA

A jurisdictional delineation was conducted in 2010 and determined that there was .004 acres and .006 acres of temporary impact to jurisdictional waters. The document states that the majority of stream crossings will be achieved by spanning the waters. The document states that temporary impacts will be mitigated at a 1:1 ratio. The applicants will have to submit an Agreement notification so that the Department can make an independent determination of

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Draft Environmental Impact Report for the Falcon Ridge Substation Project
California Public Utilities Commission for Southern California Edison
County of San Bernardino -- SCH 2011041009
Page 3 of 3

B-3

what are jurisdictional waters of the State, what project impacts are involved, and recommend mitigation measures to offset project impacts.

If the CEQA documents do not fully identify potential impacts to lakes, streams, and associated resources and provide adequate avoidance, mitigation, monitoring, funding sources, a habitat management plan and reporting commitments, additional CEQA documentation will be required prior to execution (signing) of the Agreement. In order to avoid delays or repetition of the CEQA process, potential impacts to a stream or lake, as well as avoidance and mitigation measures need to be discussed within this CEQA document.

The Department opposes the elimination of drainages, lakes and their associated habitats. The Department recommends avoiding the stream and riparian habitat to the greatest extent possible. Any unavoidable impacts need to be compensated with the creation and/or restoration of in-kind habitat either on-site or off-site at a minimum 3:1 replacement-to-impact ratio, depending on the impacts and proposed mitigation. Additional mitigation requirements through the Department's Streambed Alteration Agreement process may be required depending on the quality of habitat impacted, proposed mitigation, project design, and other factors.

We recommend submitting a notification early on, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Streambed Alteration Agreement notification package please go to the Department's website at <http://www.dfg.ca.gov/habcon/1600/forms.html>.

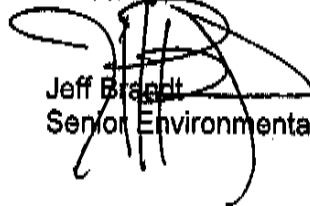
The following information will be required for the processing of a Streambed Alteration Agreement and the Department recommends incorporating this information to avoid subsequent CEQA documentation and project delays:

- 1) Delineation of lakes, streams, and associated habitat that will be temporarily and/or permanently impacted by the proposed project (include an estimate of impact to each habitat type);
- 2) Discussion of avoidance measures to reduce project impacts; and,
- 3) Discussion of potential mitigation measures required to reduce the project impacts to a level of insignificance.

Section 15370 of the CEQA guidelines includes a definition of mitigation.

Thank you for this opportunity to comment. Please contact Robin Maloney-Rames, Environmental Scientist, at (909) 980-3818, if you have any questions regarding this letter.

Sincerely,



Jeff Bright
Senior Environmental Scientist

B-3.11
(cont.)

2.6.4 Letter B-3 – Responses to Comments from California Department of Fish and Game (CDFG)

B-3.1 SCE's botanical surveys documents cite that methods were consistent with the CDFG 2009 survey protocol. The first sentence of the fifth paragraph on page 4.4-22 of the Draft EIR has been revised as follows to reflect this information:

Following comprehensive botanical surveys that were consistent with the current protocols created by CDFG (CDFG, 2009), two non-listed special-status plants were identified in the study area: Plummer's mariposa lily and Parry's spineflower, and are discussed below (BonTerra, 2010b; 2011). No other special-status plant species were observed during focused plant surveys.

The following has been added to the References on page 4.4-42 of the Draft EIR:

California Department of Fish and Game, 2009 (November 24). Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Sacramento, CA: CDFG.

B-3.2 Surveys for listed plants and wildlife were comprehensive in nature and considered the presence or absence of all species with the potential to occur in the Project Area. Trapping surveys for San Bernardino kangaroo rat and Los Angeles pocket mouse included a habitat assessment to characterize the distribution of potential habitat for these species and surveys subsequently were performed within potentially suitable habitat. Surveys for other listed species, including rare plants, Delhi sands flower-loving fly, and Coastal California gnatcatcher, were performed consistent with state and federal survey protocols.

B-3.3 CDFG's comment appears to concur with the Draft EIR assessment that numerous plant and wildlife species have a moderate to high potential to occur in the Project Area. The CDFG comment also summarizes identified impacts of several proposed facilities and notes that impacts to Riversidean alluvial fan sage scrub habitat are not quantified because much of the habitat will be avoided. Comment noted.

B-3.4 Nine focused biological survey reports and technical reports are referenced in the Draft EIR, totaling more than 600 pages in length, including the following:

- Biological Technical Report: Falcon Ridge Substation Project (2010)
- Results of the Special-Status Plant Surveys for the Falcon Ridge Substation Project (2010)
- Results of 2011 Focused Plant Surveys for the Falcon Ridge Substation Project (2011)
- Results of Western Burrowing Owl Surveys for the Falcon Ridge Substation Project (2010)

- Results of Focused Presence/Absence Surveys for the Coastal California Gnatcatcher for the Falcon Ridge Substation Project (2010)
- Jurisdictional Delineation Report, Falcon Ridge (Etiwanda) Substation Project (2010)
- Delhi Sands Flower-loving Fly (*Rhaphiomidas terminatus abdominalis*) Focused Adult Survey at Southern California Edison's Falcon Ridge Project (2010)
- Delhi Sands Flower-loving Fly (*Rhaphiomidas terminatus abdominalis*) Focused Adult Survey at Southern California Edison's Falcon Ridge Project (2011)
- Results of a Habitat Assessment and Trapping Survey for San Bernardino Kangaroo Rat and Los Angeles Pocket Mouse on the Falcon Ridge Substation Project (2010)

These survey reports are readily accessible and available for agency and public review upon request as part of the administrative record for the Project. Vegetation maps are included in the Biological Technical Report as well as in the special-status plant surveys and the gnatcatcher survey. Due to the large size of these reports, they have not been appended to the EIR.

- B-3.5 The Draft EIR relies on a qualitative basis to define and identify disturbed native habitat. Such areas that were characterized as “disturbed” in Draft EIR Section 4.4, *Biological Resources*, showed a moderate to high degree of historic ground disturbance, and consequently exhibited low densities of native vegetation, large areas of bare ground, and extensive distribution of invasive non-native species. “Disturbed” habitat included a range of lands that supported low- to moderately vegetated remnants of native habitat (e.g., disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and disturbed mule fat scrub) and barren areas that were mostly void of vegetation due to ground disturbance (e.g., parking areas, dirt roads, and road margins). Due to past earth-moving activities, such disturbed habitats tended to have a high density of non-native grasses such as wild oats, foxtail chess, soft chess, foxtail fescue, Mediterranean grass, and goldentop grass. Disturbed areas showed evidence of historic ground disturbance and hydroseeding. The presence of old service roads also weighed toward the classification of areas as intact or disturbed habitat. This qualitative basis for designating habitat as disturbed or undisturbed is sufficient; use of a quantitative basis was not required.
- B-3.6 As discussed in Response B-3.1, botanical surveys were performed consistent with CDFG's 2009 survey requirements.
- B-3.7 Pursuant to Mitigation Measure 4.4-4 (Draft EIR, page 4.4-36), the Project Applicant shall follow the standardized avian protection guidelines developed by the Avian Power Line Interaction Committee to minimize avian mortality from interactions with power lines. The recommendations rely on the initial design of tower facilities to provide configurations that minimize impacts to birds. A Draft Mitigation, Monitoring, Reporting, and Compliance Program is included in Appendix H of this Final EIR. It has been prepared and will be used to ensure that the mitigation measures adopted as conditions for Project approval are

implemented (Pub. Res. Code §21081.6; CEQA Guidelines §15097). If and when the Project is approved by the CPUC, the CPUC will compile a Final Mitigation, Monitoring, Reporting, and Compliance Program Plan based on this draft and the mitigation measures included in the Final EIR, as certified by the CPUC.

B-3.8 Table 4.4-1 on page 4.4-4 of the Draft EIR presents the total acreage of habitats in the Project Area. Impacts to sensitive natural communities are identified in Impact 4.4-5, and include Riversidean sage scrub (4.60 acres at the proposed Falcon Ridge Substation, up to 2.0 acres at the Falcon Ridge staging area, up to 3.0 acres at the Etiwanda staging area, and 3.55 acres for the proposed subtransmission source line and fiber-optic cable routes). The following text and new Table 4.4-4 is added to the first paragraph under Impact 4.4-5 on page 4.4-37 of the Draft EIR:

Anticipated Project impacts to vegetation communities are summarized in Table 4.4-4.

**TABLE 4.4-4
ANTICIPATED PROJECT IMPACTS TO VEGETATION COMMUNITIES**

Vegetation Types	Project Component			
	Etiwanda and Alder Subtransmission Source Line and Fiber-Optic Cable Routes	Alternative Subtransmission Source Line and Fiber-Optic	Falcon Ridge Substation and Staging Area	Etiwanda Substation Upgrades and Staging Area
Riversidean Alluvial Fan Sage Scrub	0.23	0.23	0.00	0.00
Disturbed Riversidean Alluvial Fan Sage Scrub	3.27	1.65	4.60	3.00
Disturbed Riversidean Sage Scrub	0.05	0.15	0.00	0.00
Disturbed Mule Fat Scrub	0.06	0.06	0.00	0.00
Annual Grassland	1.55	1.55	0.00	0.00
Annual Grassland/Disturbed Riversidean Alluvial Fan Sage Scrub	1.12	1.12	0.00	0.00
Vineyards	1.36	1.36	0.00	0.00
Ruderal	11.48	11.03	0.04	0.11
Ornamental	0.70	0.70	0.00	0.00
Disturbed	0.61	0.61	0.00	0.00
Developed	2.51	2.84	0.00	0.00
Developed/Ornamental	0.57	3.83	0.00	0.00
Developed/Ruderal	0.54	0.55	0.00	0.00
Flood Control Channel	0.13	0.13	0.00	0.00
Total Acreage	24.18	25.81	7.39	3.11

SOURCE: BonTerra, 2010a, modified based on subsequent survey data and project modifications

B-3.9 Impacts to Riversidean alluvial fan sage scrub and Riversidean sage scrub habitat are quantified in Table 4.4-4 (see Response B-3.8). Mitigation ratios for impacts to these vegetation communities are presented in APM-BIO-02 on page 4.4-30 of the Draft EIR and are summarized below:

- 1:1 minimum replacement ratio for permanent impacts to disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub vegetation;
- 1:1 replacement ratio for temporary impacts on undisturbed/disturbed Riversidean alluvial fan sage scrub; and
- 3:1 replacement ratio for permanent impacts on undisturbed Riversidean alluvial fan sage scrub, with final compensation ratios for impacts to Riversidean alluvial fan sage scrub subject to approval from USFWS and CDFG.

B-3.10 The Applicant is in the process of submitting an application for a Lake and Streambed Alternation Agreement to CDFG.

B-3.11 The 2010 Jurisdictional Delineation Report prepared by BonTerra is disclosed in the Draft EIR. See, e.g., Draft EIR, pp. 4.4-6, 4.4-37. See also, Mitigation Measure 4.4-6(a-c) on Draft EIR page 4.4-38, which addresses impacts to jurisdictional waters, prefers avoidance over mitigation, and establishes a “minimum replacement ratio of 1:1, or as otherwise agreed to by the resource agencies, would be required to ensure that there would be no net loss of habitat value.” The mitigation measures, as drafted, are clear that CDFG could impose a mitigation ratio different than 1:1 depending on the impacts, the quality of affected habitat, and other factors. As noted in Response B-3.10, the Applicant is in the process of submitting an application for a Lake and Streambed Alternation Agreement to CDFG.



South Coast
 Air Quality Management District
 21865 Copley Drive, Diamond Bar, CA 91765-4182
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E-mailed: March 9, 2012
 falconridge@esassoc.com

March 9, 2012

Mr. John Boccio
 Falcon Ridge Substation Project
 c/o ESA
 225 Bush St. Suite 1700
 San Francisco, CA 94104

**Review of the Draft Environmental Impact Report (DEIR) for the
 Falcon Ridge Substation Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final environmental impact report (Final EIR) document as appropriate.

Construction Air Quality Impacts and Mitigation

Based on the air quality analysis summarized in Section 4.3 of the Draft EIR the proposed project would have significant regional air quality impacts. Specifically, the proposed project would exceed the AQMD's regional construction emissions thresholds for NO_x and PM₁₀. As a result, the lead agency proposed mitigation measure 4.3-1 that requires a 20% NO_x reduction and 45% PM₁₀ reduction from the project's construction equipment compared to the most recent CARB fleet average. However, the proposed project remains significant; therefore, to further reduce air quality impacts from the proposed project the AQMD staff recommends that the lead agency revise mitigation measure 4.3-1a as follows:

During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:

- ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a

B-4.1

Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ✓ A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for AQMD “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

B-4.1
(cont.)


B-4.2

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Contact Information

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

[IM:DG](#)

SBC120127-03
Control Number

2.6.5 Letter B-4 – Responses to Comments from South Coast Air Quality Management District (SCAQMD)

B-4.1 It is acknowledged that only using construction equipment that would meet USEPA-certified Tier 3 or higher emission standards would achieve reductions beyond the requirements of Mitigation Measure 4.3-1a; however, it may not be practical or feasible for the Applicant to use such equipment exclusively due to equipment availability in the Project Area. Therefore, Mitigation Measure 4.3-1a on page 4.3-17 of the Draft EIR has been revised as shown below to require the Applicant to make a good faith effort to use the highest USEPA-certified tiered construction equipment available, and the Applicant shall provide documentation of its efforts to obtain such equipment for construction of the Project.

Mitigation Measure 4.3-1a: For ~~diesel-fueled off-road construction equipment of more than 50 horsepower and on-road diesel fueled vehicles~~, SCE shall make a good faith effort to use available construction equipment that meets the highest USEPA-certified tiered emission standards ~~ensure achievement of a Project wide fleet average 20 percent NO_x reduction and 45 percent PM10 exhaust reduction compared to the most recent CARB fleet average~~. An Exhaust Emissions Control Plan ~~to achieve that identifies each unit's certified tier specification, Best Available Control Technology (BACT), and the CARB or SCAQMD operating permit number (if applicable)~~ these reductions 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. Acceptable options for reducing emissions include the use of late model engines, low emission diesel products, alternative fuels, engine retrofit technology, after treatment products, and/or other options as such become available. For all pieces of equipment that would not meet Tier 3 emission standards, the Exhaust Emissions Control Plan shall include 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.

B-4.2 It is acknowledged that construction contractors can receive incentives by applying for SCAQMD “SOON” program funds to accelerate clean-up of off-road diesel vehicles, such as heavy duty construction equipment. The CPUC encourages all efforts to reduce adverse effects on the environment, including effects associated with construction vehicle emissions.



City of Fontana

CALIFORNIA

March 9, 2012

Mr. John Boccio, Falcon Ridge Substation Project
 C/O
 ESA/Energy Group
 225 Bush Street, Suite 1700
 San Francisco, CA 94104

Re: Notice of Availability of a Draft Environmental Impact Report (DEIR) SCH No. 2011041009, for the Falcon Ridge Substation Project (A.10-12-017) submitted by Southern California Edison Company (SCE).

Dear Mr. Boccio:

The City of Fontana has previously responded to this project and the DEIR as outlined below:

- CPUC Application 10-12-017 filed 12/29/2010 with City letter dated January 26, 2011(copy attached);
- A letter dated May 27, 2011, to your EIR consultant, ESA/Energy Group (copy attached); and,
- Oral presentation at the CPUC DEIR public meeting at Summit High School in Fontana, on February 16, 2012.

At the onset of being notified of this proposed substation project, City staff has emphasized the need to mitigate the aesthetic impacts of this project to the citizens/residents of the City of Fontana. Contrary to the pictures of the existing scenic view corridors presented to the PUC by SCE that supported their early claim of no impacts to aesthetics, City staff presented pictures of the scenic view corridors within the City of Fontana that clearly depicted view corridors that would be significantly impacted by the proposed project. The addition of a significant number of new poles at a height of 128 to 225 feet with multiple transmission lines various levels, will significantly impact the views of the San Gabriel and San Bernardino Mountains.

The DEIR concludes that impacts to all scenic view corridors (except along San Sevaine Road and South Highland Avenue) will be less than significant with the proposed mitigation:

“SCE and/or its contractors shall use subtransmission line conductors that are non-specular and non-reflective and insulators that are non-reflective and non-refractive.”

The DEIR also concludes that construction of the transmission lines along San Sevaine Road and South Highland Avenue (outside of the existing SCE corridor), will result in significant negative

B-5.1

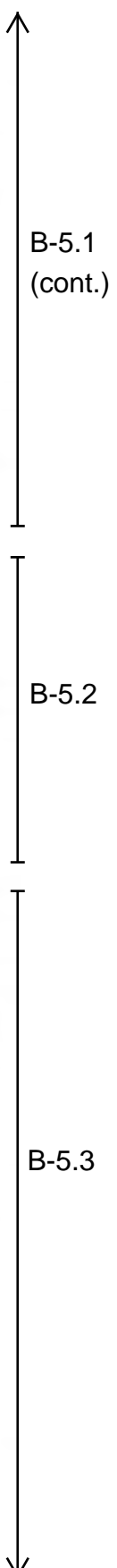
impacts after incorporating the above referenced mitigation measure. No additional mitigation measure is proposed and the DEIR concludes that impacts will be significant and unavoidable.

City staff has the following comments on the mitigation measure proposed in the DEIR, the aesthetic impact analysis, and alternative mitigation measures that have not been evaluated in the DEIR that would reduce impacts to aesthetics at the last significant view corridors in the City of Fontana:

- Utilizing non-specular and non-reflective line conductors and non-reflective and non-refractive insulators will not reduce the negative impacts caused by the additional transmission lines and support poles. The impacts to the view corridors from the conductors and insulators are very insignificant when compared to the significant impacts from the numerous levels of new transmission lines and the significant number of new poles proposed. Even if the conductors and insulators were transparent or made from an advanced technology that would blend them into the background, they would not be an effective mitigation to reduce the negative impact of the new transmission lines and poles.
- The analysis to determine if Aesthetic impacts are significant is presented in the DEIR based on the primary view from a moving vehicle and not from a pedestrian view point. The City of Fontana's elected officials, staff, and residents take pride in the fact that the City is a walkable community. The City has plans for expansion of its extensive walking trails and bike path network. Not only will there be significant impacts to the view from a moving vehicle, the primary impacts from the proposed transmission lines and support poles will be to the residents walking in their neighborhoods and also walking in the open spaces and view corridors to the north that are connected to the trail systems in the City. The fleeting glance from a moving vehicle should not be the primary factor used to evaluate whether an impact on aesthetics is significant or not.
- None of the alternatives presented in the DEIR included provisions for selective undergrounding within the proposed project alignment (within the City of Fontana) of the transmission lines at key view corridors as suggested by City staff in previous letters. Alternative 9, Page 3-8, Table 3-2, proposes undergrounding in the SCE ROW (outside of the project alignment), crossing the 210 Freeway underground between Cherry Avenue and San Sevaine Road (within the City of Fontana). This alternative is considered to be technically infeasible because of underground conflicts with a flood control box culvert, water and gas lines, and freeway infrastructure. An alternative at this location that undergrounds the transmission lines within Highland Avenue and San Sevaine Road would be technically feasible and would reduce Aesthetic impacts to a level that is less than significant. Based on the CEQA requirements documented in Chapter 3, Page 3-1, bullet three and four at the bottom of the page,

"The CEQA Guidelines provide the following guidance for discussing project alternatives:

- *The discussion shall focus alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (§15126.6(b))*
- *The range of alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects (§15126.6(c))."*



B-5.1
(cont.)

B-5.2

B-5.3

undergrounding at this location should be evaluated in an alternative or adopted as a mitigation measure in the proposal.

↑ B-5.3
↓ (cont.)

The City of Fontana staff has the following additional questions/comments on the DEIR:

- Will the PUC recommend that SCE build Alternative 1, the environmentally superior alternative identified on Page ES-8?
- If the environmentally superior alternative is not selected, City staff suggests the following change: Page 2-1, Paragraph 2.2, Project Location – The 5th and 6th sentences should be changed to read “The new 66kV subtransmission line would leave Alder Substation and parallel West Casmalia Street until it reaches ~~Mango Avenue~~ the City boundary line. The subtransmission line would then traverse north to intercept and follow along the future extension of Mango Avenue until it reaches the Falcon Ridge Substation. This alignment would reduce the length of the subtransmission line, reduce aesthetic impacts and cost less for SCE. This route was discussed with SCE staff with no commitment to modify the proposed alignment.
- Page 2-12, 1st paragraph and Page 2-16, Paragraph 2.7, Rights-of-way Requirements references the need to acquire approximately 13 acres of new ROW for the subtransmission source lines and access roads. Please provide the location(s) of the acreage needed for the source lines and access roads.
- Page 2-20, last bullet – Show the location of this access road. Is this proposed on SCE controlled property? If the new subtransmission line is proposed in the existing ROW of South Highland Avenue and San Sevaime Road, why is this access road required?
- Page 2-21, ninth bullet, last sentence – The proposed access road on Mango Avenue, from the substation, should continue south along the City boundary line along the San Bernardino County landfill and City boundary to Casmalia Street. This routing for the poles and the access road would reduce the construction cost for SCE and reduce the visual impacts of the new lines and access road to Fontana residents.
- Page 3-2, Alternatives Development and Screening Process, Item 2 states, “consider input received during the scoping process that relates to alternatives to the Project.”- During the scoping process, the City of Fontana staff expressed concerns with the potential impacts to the critical view corridors that intersect the proposed source line and fiber optic cable route. City of Fontana staff proposed undergrounding at specific locations (see attached letters) to reduce the visual impacts. These alternatives were not evaluated or adopted in the DEIR. An alternative should be evaluated (along the proposed alignment) that shows undergrounding at the select view corridors in Fontana and along South highland Avenue and San Sevaime Road.
- Chapter 4, Section 4.1, Aesthetics - Throughout this section, (Page 4.1-2, 4th paragraph, Page 4.1-6, 3rd paragraph, Page 4.1-7, 3rd paragraph, Page 4.1-8, 1st paragraph, Page 4.1-9, 3rd paragraph) there are references to agricultural development and agricultural land in the discussion of the visual qualities of the project area. There are no Agriculture zoned lands in Fontana or agricultural production along the project route or adjacent to the proposed Falcon ridge Substation. There are remnant vineyards along a small section of the route

B-5.4

B-5.5

B-5.6

B-5.7

adjacent to San Sevaine Road and South Highland Avenue that have been non-productive for over ten years. The visual analysis used to identify Aesthetic impacts appears to be based on an environment that doesn't exist in the project area and therefore leads one to question conclusions reached on Aesthetic impacts. Where are the Agricultural developments located?

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B-5.7
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- The DEIR's visual impact assessment is fatally flawed. The visual simulation photographs of the Project do not provide a fair representation of the neighborhoods that will be impacted by the poles and transmission lines (see City of Fontana photos in May 27, 2011 letter). The visual simulation photographs of the Project in the DEIR are not accurate depictions of the environment/view corridors in which the transmission lines will be sited. In addition, the EIR visual simulation photographs are taken along the existing and proposed transmission lines and not perpendicular to the transmission lines to show the impact to the view corridors that run north and south, thus downplaying the true visual impacts. The misleading nature of the visual simulations contained in the DEIR is illustrated by the contrasting photos provide by Fontana staff that illustrate the existing unobstructed visual

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B-5.8
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The City of Fontana looks forward to working with the CPUC and SCE to ensure that this project, which is very important to the City of Fontana and the region, is processed in a timely manner with minimum impacts to the community. We believe that this would best be accomplished by acknowledging and realistically addressing the community's concerns which have been expressed early, repeatedly, clearly, and now emphatically. Please contact me at (909) 350-6724.

Respectfully,

DEVELOPMENT SERVICES ORGANIZATION
Community Development Department



Charles D. Fahie, AICP
Senior Planner

Cc: Don Williams, AICP, Director of Community Development

Atch: PUC application 10-12-017 (ltr. Dated 1/26/11)
Letter dated 5/27/11



City of Fontana CALIFORNIA

May 27, 2011

ESA/Energy Group
Janna Scott, J. D.
225 Bush Street, Suite 1700
San Francisco, CA 94104

Re: Additional photos in response to the Notice of Application for a Permit to Construct (PTC) for the Falcon Ridge Substation Project dated December 29, 2010 submitted by Southern California Edison Company (SCE).

B-5.8
(cont.)

Dear Ms. Scott:

In our letter to the CPUC dated January 26, 2011, City staff has concluded that this project may result in significant Aesthetic impacts from the placement of the overhead 66 kV subtransmission source lines if the preferred alternative, as presented, is not modified, or additional Applicant Proposed Mitigations are not proposed to reduce the impacts. The following concerns with the PEA support the City's position on potential significant impacts within the City of Fontana:

- Potential Significant Aesthetic Impacts – The following is extracted from the City of Fontana General Plan Community Design Element, Goal #1, Issue #2, Open Space Views and Use:

“How can the City best preserve and incorporate view corridors into its design guidelines?”

Discussion: Fontana has the good fortune to be surrounded on the north and south by a significant amount of visible open space in the form of mountains and hills. To the northwest and northeast respectively lie the San Gabriel and San Bernardino Mountains; to the south lie the Jurupa Hills. These views are further enhanced by the fact that the City's street system is almost totally a north/south and east/west grid, enabling largely unobstructed views. Clearly, one of the best ways to enhance the City's identity is to use this natural open space as a defining visual boundary and a view corridor.

The City has long recognized the need to incorporate view corridors in its design guidelines. In 1987, the City commissioned a Scenic Corridor plan and Design Guidelines Study for the North Fontana area. This study identified six scenic corridor routes and two freeways for special design treatment including:

- *North-south routes: Sierra, Citrus and Cherry Avenues*
- *East-west routes: Foothill Blvd., Baseline and Highland Avenues*
- *Major freeways: I-15 and I-210*

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The study recommended the creation of spacious view corridors and incorporation of community design themes, streetscape identity devices and specialized landscape treatment at strategic points along these routes."

The following series of pictures, taken by City staff, are presented at the areas identified in the City's General Plan, Figure 6-1(attached), as significant Gateways into the city and significant View Corridors in the City of Fontana. These pictures show that there is a unique view shed that is not currently compromised by the existing utility lines and towers but will be impacted with the addition of new utility poles and transmission lines. In addition, the City's Development Code Chapter 30, Section 30-189 and Section 27-50 require the undergrounding of existing utility poles and transmission lines. All existing above ground power lines and poles (outside of the existing Edison corridor) will be undergrounded as a requirement for the development of the adjacent private lands, further enhancing the view shed. The pictures proposed by the applicant (SCE) are not oriented to the north (scenic view shed) but along the existing power lines and towers. The SCE pictures deliberately ignore the existing scenic view shed in an attempt to support their claim that there are no aesthetic impacts. The following pictures were taken at the same locations as the pictures referenced in the Proponents Environmental Assessment Pages 4.1-7 thru 4.1-15 and they clearly depict significant view corridors along the proposed transmission line route that should be preserved with undergrounding:

B-5.8
(cont.)

The scenic corridors that exist along Baseline Avenue (Figure 4.1-5 ID # 2 location in SCE's Environmental Assessment):



On Baseline Ave looking west at the designated view corridor.



On Baseline Ave looking west at the designated view corridor.

Along Beech Avenue (designated as a view corridor in the City's General Plan but not evaluated in the proponents environmental assessment):



On Beech Avenue looking north along the General Plan designated view corridor

B-5.8
(cont.)



On Beech Avenue looking north along the General Plan designated view corridor

Along Cypress Avenue (designated as a view corridor in the City's General Plan but not evaluated in the proponents environmental assessment):



B-5.8
(cont.)

North of Summit Avenue on Cypress Avenue looking north along the designated view corridor. Proposed new transmission lines and poles will impact this view.



B-5.8
(cont.)

On Citrus Avenue alignment: (view to the north designated as a view corridor in the City's General Plan. View to the north not evaluated in the proponent's environmental assessment only a view to the east along the existing power lines and towers submitted) (Figure 4.1-5 ID # 5 location in SCE's Environmental Assessment):



On Citrus Avenue looking north along the General Plan designated view corridor



B-5.8
(cont.)

The scenic view shed that exist along Sierra Avenue (Figure 4.1-5 ID # 6 & 7 locations in SCE's Environmental Assessment):



On Sierra Avenue looking north along the General Plan designated view corridor



B-5.8
(cont.)

Along South Highland Avenue and San Sevaine Avenue



The existing view shed that exist along South Highland Avenue and San Sevaine Avenue (Figure 4.1-5 ID # 3 location in SCE's Environmental Assessment). Top photo is looking north on San Sevaine towards the 210 Freeway and the bottom photo is looking west on South Highland Avenue towards the San Gabriel Mountains. The existing power lines and poles will be undergrounded by the adjacent approved development:



B-5.8
(cont.)

The scenic view that exist along Knox Avenue (Figure 4.1-5 ID # 4 location in SCE's Environmental Assessment):



B-5.8
(cont.)

The above locations and the identified View Corridors and Gateways in the City of Fontana's General Plan will be significantly affected by the proposed 66kV lines if they are installed above ground and result in significant negative Aesthetic impacts. In addition, the view of the San Gabriel and San Bernardino mountains to the north (no visual simulations were provided in the PED from any of the residential developments viewing the mountains to the north) from the existing and approved residential developments north of Summit Avenue will be significantly impacted by the proposed installation of the new transmission lines unless Applicant Proposed Measures to reduce impacts are included in the PEA. The existing 500 kV SCE towers are normally spaced approximately 1,300 feet to 1,570 feet apart with a height range of 128 feet to 225 feet. The height of the transmission lines vary, but for argument sake, we can assume that they are at least 100 feet or higher from the ground surface. The proposed 66 kV poles are spaced from 155 feet to 240 feet with a height range of 61 feet to 100 feet with an assumed height of the transmission lines at a minimum of 50 feet. Given that the new smaller poles for the 66kV transmission lines impacts a view shed that is not compromised by the existing 500 kV lines and towers, this new construction will result in significant impacts to the scenic view shed without Applicant Proposed Measures to reduce impacts.

Suggested Mitigation:

1. Underground all transmission lines where they cross the designated Gateways and View Corridors in the City's General Plan (Baseline Avenue, cherry Avenue, Beech Avenue, Citrus Avenue, and Sierra Avenue).
2. Underground all transmission lines where they exit the existing SCE Corridor and are routed along South highland Avenue and San Sevaine Avenue.

The proposed substation may impact existing views that are currently enjoyed from the surrounding communities. The substation is located off of Sierra Avenue, designated as a scenic corridor route in the City of Fontana General Plan. The PEA, Page 3-10, second and third paragraphs references perimeter wall treatment for the substation and future landscaping to filter views for the surrounding community and other potential sensitive receptors. This perimeter treatment and landscaping should be detailed and identified as Applicant Proposed Measures to reduce Aesthetic Impacts in the PEA and initial Study Checklist.

View from Sierra Avenue towards the proposed substation site (Figure 4.1-5 ID # 6 location in SCE's Environmental Assessment):



Suggested Mitigation:

1. Applicant submits a detailed site plan and landscape plan showing type plant material, and irrigation system for the substation site utilizing the City of Fontana landscape standards;
2. Install a decorative block wall around the substation at a minimum of 10 feet in height;
3. Plant vines along the perimeter of the block wall that is visible from Sierra Avenue to break up the outline of the wall and discourage graffiti;
4. We understand that trees may not be planted within the substation area but we request that trees be planted on the portion of the SCE parcel that is not utilized for

- the substation enclosure but lies between the substation and the view shed from Sierra Avenue; and,
- 5. Provide a sight line analysis to show screening of the substation.

Given the information provided above, it is inconceivable that the CEQA Initial Study Checklist submitted with the application to the CPUC does not list Aesthetics as an environmental factor that would potentially be affected by the project (Page A-6 of Appendix A). In addition, Page A-10, Section I, of the Initial Study Checklist shows No Impact to an existing scenic vista.

The City of Fontana looks forward to working with the CPUC and SCE to ensure that this project, which is very important to the City of Fontana and the region, is processed in a timely manner with minimum impacts to the community. Please contact me at (909) 350-6724.

Respectfully,

DEVELOPMENT SERVICES ORGANIZATION
Community Development Department



Charles D. Fahie, AICP
Senior Planner

B-5.8
(cont.)

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

In the Matter of the Application of
SOUTHERN CALIFORNIA EDISON
COMPANY (U 338-E) for a Permit to
Construct Electrical Facilities with Voltages
Between 50 kV and 200 kV;
Falcon Ridge Substation Project

APPLICATION 10-12-017

(Filed 12/29/2010)

B-5.8
(cont.)

**CITY OF FONTANA'S RESPONSE TO THE NOTICE OF APPLICATION FOR A
PERMIT TO CONSTRUCT (PTC) FOR THE FALCON RIDGE SUBSTATION
PROJECT DATED DECEMBER 29, 2010 SUBMITTED BY SOUTHERN CALIFORNIA
EDISON COMPANY (SCE)**

**DON WILLIAMS, AICP
Director Of Community Development
City of Fontana
8353 Sierra Avenue
Fontana, CA 92335-3528
Telephone: (909) 350-7600
Facsimile: (909) 350-6613**

January 27, 2011



City of Fontana CALIFORNIA

January 26, 2011

California Public Utilities Commission
Docket Office, Room 2001
505 Van Ness Avenue
San Francisco, CA 94102

Re: Response to the Notice of Application for a Permit to Construct (PTC) for the Falcon Ridge Substation Project dated December 29, 2010 submitted by Southern California Edison Company (SCE).

Dear Sir:

Thank you for the opportunity to submit a protest on the above-referenced application filed with the California Public Utilities Commission (CPUC). The proposed 66/12kilovolt (kV) distribution substation is located within the City of Fontana, generally located at the southeast corner of Casa Grande and Sierra Avenue. Additionally, the proposed source lines connecting this substation to other substations in the area are proposed within existing SCE easements and at least one new easement contemplated in the City of Fontana.

The City of Fontana is concerned with the conclusions set forth in the Proponent's Environmental Assessment (PEA) given that the City wasn't provided a review copy of the PEA prior to its submittal to the CPUC. Based on our review of the applicant's PEA and our own knowledge of our community and planning documents, this project may result in significant aesthetic impacts and land use impacts from the placement of the overhead 66 kV subtransmission source lines. We therefore respectfully protest this proposal and request that public hearings be held to receive input from the City, from residents, and from the affected surrounding property owners. The City has detailed and attached a list of concerns with the PEA and the apparent lack of information in the PEA, and provides a summary of the concerns below:

1. Proposed new ROW for the 66 kV transmission lines and access roads will significantly impact existing and approved residential development site plans resulting in potential significant impacts to existing/approved Land Uses without Applicant Proposed Measures to reduce impacts.
2. Proposed installation of the 66 kV lines along the new alignment of Mango Avenue as it intercepts Casmalia Avenue (Sierra Lakes Parkway) should be considered for revisions to follow a straight line to Casmalia Avenue (Sierra Lakes Parkway) along the landfill's western boundary to reduce the Aesthetic and Land Use impacts to the existing commercial uses and future development at the Casmalia Avenue (Sierra Lakes Parkway) and Mango Avenue intersection.

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B-5.8
(cont.)

3. Proposed 66 kV transmission lines may result in potentially significant impacts without Applicant Proposed Measures to reduce impacts to designated scenic view sheds/scenic corridors (designated in the Community Design Element, Goal No. 1, of the City of Fontana General Plan) north of Summit Avenue, north along Sierra Avenue, north along Citrus Avenue and Cypress Avenue and west along Baseline Avenue unless they are undergrounded. This is contrary to the No Impact findings in the PEA Page 4.1-21, third paragraph.
4. Visual impacts of the substation cannot be determined or deemed to be "less than significant" without a detail of the landscaping and screening that will be provided; this detail should be included in the PEA.
5. There should be a discussion in the CEQA Initial Study Checklist, and the PEA, on the impacts or lack of impacts from EMP (Electro Magnetic Field) as a result of the additional transmission lines. At the minimum, a reference in the PEA should be made to the addendum document which addresses this issue.
6. Aesthetic Impacts – Underground proposed 66 kV subtransmission source lines at existing parks, adjacent to existing residential dwelling units and approved residential projects (primarily north of Summit Avenue), at scenic crossings such as Sierra Avenue, Baseline Avenue, and Citrus Avenue, and along any new ROW (along South Highland Avenue and San Sevaine Avenue).
7. Aesthetic Impacts – Provide a detailed landscaping plan for the substation with visual simulations to ensure less than significant visual impacts.
8. Land Use and Planning Impacts – Eliminate the 30 foot ROW easement proposed in the Summit at Rosena Specific Plan, or include a discussion of the need for the easement and an environmental review satisfactory to address the possible use of eminent domain authority to require the easement as expressed to City staff by SCE team leaders.
9. Land Use and Planning Impacts -- ROW for the 66 kV subtransmission lines on the west side of the landfill along the alignment of Mango Avenue should extend south in a straight line along the landfill until the ROW intersects Sierra Lakes Parkway.

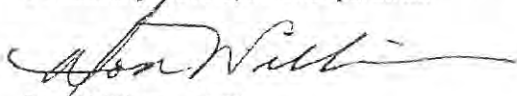
Per the instructions in the Notice of Application, the following person is the point of contact for the City of Fontana:

Don Williams, AICP, Director of Community Development
 8353 Sierra Avenue
 Fontana, CA 92335
 (909) 350-6723
 dwilliams@fontana.org

The City of Fontana looks forward to working with the CPUC and SCE to ensure that this project, which is very important to the City of Fontana and the region, is processed in a timely manner with minimum impacts to the community. Please contact Charles Fahie, AICP, Senior Planner at (909) 350-6724 or Don Williams, AICP, Director of Community Development at (909) 350-6723 as to the time and place for public hearings.

Respectfully,

DEVELOPMENT SERVICES ORGANIZATION
Community Development Department



Don Williams, AICP
Director of Community Development

Attachment:

City of Fontana's response to PEA for Falcon Ridge Substation project

cc: Southern California Edison Co.
Law Dept. - Exception Mail
Attn: Meraj Rizvi
2244 Walnut Grove Avenue
Rosemead, CA 91770

California Public Utilities Commission
Director, Energy Division
505 Van Ness Avenue, 4th Floor
San Francisco

Ken Hunt, City Manager
Don Williams, AICP, Director of Community Development
Ricardo Sandoval, City Engineer
Charles Fahie, AICP, Senior Planner

B-5.8
(cont.)

**The City of Fontana's response to the Proponents Environmental
Assessment (PEA), submitted by SCE, for the Falcon Ridge Substation
Project dated
December 29, 2010.**

The Proponents Environmental Assessment (PEA) concludes that,

"with the implementation of Applicant-Proposed Measures (APMs), the majority of the potential significant environmental effects associated with the Proposed Project would be reduced to less than significant levels. However, impacts to Air Quality would remain significant and unavoidable."

After reviewing the PEA, City staff has concluded that this project may result in significant Aesthetic impacts and Land Use impacts from the placement of the overhead 66 kV subtransmission source lines if the preferred alternative as presented is not modified, or additional APMs are not proposed to reduce the impacts. The following concerns with the PEA support the City's position on potential significant impacts within the City of Fontana:

- Potential Significant Land Use Impact - The project description for the Etiwanda subtransmission source line route states, *"The 66 kV subtransmission facilities would then again extend northeast within SCE's existing transmission ROW until it intersects with Summit Avenue. The 66 kV subtransmission facilities would then extend east on SCE's existing transmission ROW until it reaches the Proposed Substation site."* Figure 3.2, Page 3-7 of the PEA depicts a 30 foot wide 66 kV easement and proposed 66kV lines adjacent to but outside of the existing SCE ROW. In other sections and figures (vegetation maps) of the PEA, this easement that runs from the substation west approximately 2500 feet from Sierra Avenue to Cypress Avenue is depicted for access road only and the 66 kV line is in the existing SCE ROW. Section 3.3, page 3-46, references the acquisition of approximately 13 acres of new easement rights for a 30 foot wide ROW to accommodate the subtransmission source lines and road access for a distance of approximately 3.6 miles in length, but it doesn't give the locations for the new ROW. This discrepancy in the document must be resolved prior to circulation of the document. Regardless of whether the easement will be utilized for access roads or for the construction of transmission lines, the impact on the existing land uses must be evaluated in the PEA. Acquisition of this easement may result in potentially significant Land Use impacts within the approved Summit at Rosena Specific Plan on the northwest corner for Sierra Avenue and Summit Avenue. A 30 foot Easement could result in a major revision to the approved specific plan to accommodate lot dimensions and street design. A discussion of the impacts of utilizing Eminent Domain to acquire the land and the environmental consequences should be discussed in the PEA.

The proposal to install above ground subtransmission source lines along the alignment of Mango Avenue to the intersection of Sierra Lakes Parkway and then east along Sierra Lakes Parkway to Rialto should be modified to run along the landfill until the lines intercept sierra lakes parkway/Casmalia Avenue then continue east to Rialto. This would alleviate any potential significant Land Use Impacts proposed at the northeast and northwest corner of Mango Avenue and Sierra Lakes Parkway.

B-5.8
(cont.)

January 26, 2011

Given the information provided above, it is inconceivable that the CEQA Initial Study Checklist submitted with the application to the CPUC does not list Land Use and Planning as an environmental factor that would potentially be affected by the project (Page A-6 of Appendix A). In addition, Page A-14, Section X, of the Initial Study Checklist shows No Impact to Land Use and Planning.

- Potential Significant Aesthetic Impacts – The following is extracted from the City of Fontana General Plan Community Design Element, Goal #1, Issue #2, Open Space Views and Use:

“How can the City best preserve and incorporate view corridors into its design guidelines?”

Discussion: Fontana has the good fortune to be surrounded on the north and south by a significant amount of visible open space in the form of mountains and hills. To the northwest and northeast respectively lie the San Gabriel and San Bernardino Mountains; to the south lie the Jurupa Hills. These views are further enhanced by the fact that the City's street system is almost totally a north/south and east/west grid, enabling largely unobstructed views. Clearly, one of the best ways to enhance the City's identity is to use this natural open space as a defining visual boundary and a view corridor.

The City has long recognized the need to incorporate view corridors in its design guidelines. In 1987, the City commissioned a Scenic Corridor plan and Design Guidelines Study for the North Fontana area. This study identified six scenic corridor routes and two freeways for special design treatment including:

- *North-south routes: Sierra, Citrus and Cherry Avenues*
- *East-west routes: Foothill Blvd., Baseline and Highland Avenues*
- *Major freeways: I-15 and I-210*

The study recommended the creation of spacious view corridors and incorporation of community design themes, streetscape identity devices and specialized landscape treatment at strategic points along these routes.”

The scenic corridors that exist along Baseline Avenue, Sierra Avenue and Citrus Avenue will be significantly affected by the proposed 66kV lines if they are installed above ground and result in significant negative Aesthetic impacts. In addition, the view of the San Gabriel and San Bernardino mountains to the north (no visual simulations were provided in the PED from any of the residential developments viewing the mountains to the north) from the existing and approved residential developments north of Summit Avenue will be significantly impacted by the proposed installation of the new transmission lines unless Applicant Proposed Measures to reduce impacts are included in the PEA. The existing 500 kV SCE towers are normally spaced approximately 1,300 feet to 1,570 feet apart with a height range of 128 feet to 225 feet. The height of the transmission lines vary, but for argument sake, we can assume that they are at least 100 feet or higher from the ground surface. The proposed 66 kV poles are spaced from 155 feet to 240 feet with a height range of 61 feet to 100 feet with an assumed height of the transmission lines at a minimum of 50 feet. Given that the new smaller poles for the 66kV transmission lines impacts a view shed that is not compromised by the existing 500 kV lines and towers, this new construction will result in significant impacts to the scenic view shed without Applicant Proposed Measures to reduce impacts.

B-5.8
(cont.)

The proposed substation may impact existing views that are currently enjoyed from the surrounding communities. The substation is located off of Sierra Avenue, designated as a scenic corridor route in the City of Fontana General Plan. The PEA, Page 3-10, second and third paragraphs references perimeter wall treatment for the substation and future landscaping to filter views for the surrounding community and other potential sensitive receptors. This perimeter treatment and landscaping should be detailed and identified as Applicant Proposed Measures to reduce Aesthetic Impacts in the PEA and initial Study Checklist.

Given the information provided above, it is inconceivable that the CEQA Initial Study Checklist submitted with the application to the CPUC does not list Aesthetics as an environmental factor that would potentially be affected by the project (Page A-6 of Appendix A). In addition, Page A-10, Section I, of the Initial Study Checklist shows No Impact to an existing scenic vista.

B-5.8
(cont.)

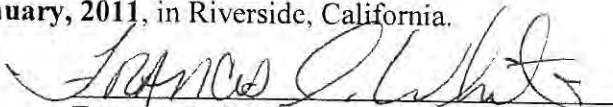
**CERTIFICATE OF SERVICE
A. 10-12-017**

I hereby certify that I have this day served a copy of "CITY OF FONTANA'S RESPONSE TO THE NOTICE OF APPLICATION FOR A PERMIT TO CONSTRUCT (PTC) FOR THE FALCON RIDGE SUBSTATION PROJECT DATED DECEMBER 29, 2010 SUBMITTED BY SOUTHERN CALIFORNIA EDISON COMPANY (SCE)" on all known parties to **Application 10-12-017** by using the following service:

E-Mail Service: sending the entire document as an attachment to all known parties of record who provided electronic mail address.

U.S. Mail Service: mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed this 27 day of **January, 2011**, in Riverside, California.


Frances A. White

Parties

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2.6.6 Letter B-5 – Responses to Comments from City of Fontana

B-5.1 The CPUC received and considered input from the City of Fontana during the preparation of the Draft EIR. See, for example, Draft EIR Appendix A, *Scoping Report*, pages A-12 through A-14, which identify the City as a source of input and summarize comments made regarding potential aesthetic impacts of the Project. See also, Scoping Report Appendix A (Draft EIR, p. A-36) and Appendix E (Draft EIR, pp. A-67 and A-71 et seq.), which register the City’s attendance and participation at the scoping meeting. Further, Scoping Report Appendix F (Draft EIR, p. A-96 et seq.) provides a copy of the City’s January 26, 2011, scoping letter and Appendix G (Draft EIR, p. A-112 et seq.) summarizes a separate meeting between the CPUC and the City on May 11, 2011. The City’s May 27, 2011, letter provided additional input regarding potential aesthetic effects. Receipt of the additional copies of the January 26 and May 27, 2011, letters, including view corridor photographs representative of baseline conditions, is acknowledged.

As indicated in Draft EIR Figure 2-2 (p. 2-5), a total of 24 tubular steel poles, 204 light weight steel poles and 6 wood poles would be installed between the existing Etiwanda Substation and the proposed Falcon Ridge Substation. Figure 2-2 also identifies locations where a portion of the existing line could be installed underground as part of the Project and two locations where existing poles would be removed. The new poles would be a maximum of 100 feet tall, as indicated in Draft EIR Table 2-1 (p. 2-12) and shown in Draft EIR Figure 2-5 (p. 2-13), and not “at a height of 128 to 225 feet” as indicated in the comment.

Impacts to views of the San Gabriel and San Bernardino Mountains are analyzed as Draft EIR Impact 4.1-1 (p. 4.1-25 et seq.), pertaining to adverse effects on scenic vistas, and Impact 4.1-5 (p. 4.1-32 et seq.), pertaining to degradation of the existing visual character or quality of the site and its surroundings. Draft EIR page 4.1-25 explains, “As described in the *Setting*, the cities of Fontana, Rialto, and Rancho Cucamonga consider the San Gabriel and San Bernardino Mountains as important scenic and character-defining backdrops. Although not “scenic vistas” per the definition provided under *Definitions Related to Visual Resources*, this analysis includes the scenic view corridors identified by the cities of Fontana, Rialto and Rancho Cucamonga, because unencumbered views of the mountains are considered as a scenic resource by all three cities for the purpose of land use planning and community design.”

Mitigation Measure 4.1-1 would require the use of non-reflective insulators and conductors, which would reduce the level of glare associated with Project components and would, by extension, reduce the degree to which Project components would attract viewer attention. While this would reduce the level of visual contrast associated with glare, glare is only one of many factors that collectively affect the overall visual change caused by the Project, which in turn determines impact significance. The overall visual change is influenced by other elements of visual contrast including view blockage, and

form, bulk, and dominance of the proposed structures. Each individual factor alone may not create a significant visual impact; however, collectively they contribute to a potential significant adverse impact. After implementation of Mitigation Measure 4.1-1 to reduce the impact of glare, the Draft EIR considers: (1) the numerous individual factors that influence visual contrast, (2) their contribution to the overall visual change created by construction of the Project, and (3) the visual sensitivity of the viewsheds in question. The Draft EIR then concludes that impacts to scenic vistas and scenic roadways would be less than significant with mitigation, with the exception of San Sevaine Road and Highland Avenue (Draft EIR, p. 4.1-28 et seq.) from which impacts would be significant and unavoidable.

Further mitigation is not required for locations from which impacts would be less than significant, because the CPUC does not have jurisdiction to require more. The CPUC's authority to impose mitigation measures in an EIR is subject to the constitutional requirement that there must be a nexus, or reasonable relationship, between an impact to be mitigated and the project proposed (CEQA Guidelines §§15041(a), 15126.4(a)(4); *Nollan v. California Coastal Commission*, 483 U.S. 825 (1987)).

For significant and unavoidable impacts at San Sevaine Road and Highland Avenue (Draft EIR, p. 4.1-28 et seq.), the Draft EIR does not recommend that additional mitigation measures be imposed because no other mitigation measures were determined to be feasible. For a discussion of undergrounding of Project components, see MR3.

- B-5.2 Draft EIR determinations of visual sensitivity are based on the combined factors of visual quality, viewer types and volumes, and visual exposure to the Project. Although the Draft EIR does analyze views from the perspective of motorists on local scenic and major roadways, it equally analyzes views from other visually sensitive locations, including parks and recreational areas and views from scenic vistas (Draft EIR, p. 4.1-8 et seq.) The choice of these viewsheds and viewer types is driven by a number of factors, including that visual sensitivity is characteristically more pronounced in areas of more distinctive visual quality, such as designated scenic highways, designated scenic roads, parks, and recreation and natural areas (Draft EIR, p. 4.1-2).

Pedestrian views are described in the *Regional and Local Setting* on Draft EIR page 4.1-7, under the discussion of land use and development patterns in urban/developed areas, and on page 4.1-10, under the description of views from scenic vistas. Visual impacts to pedestrian views of scenic vistas is addressed under Draft EIR Impact 4.1-1, pages 4.1-26 and 4.1-27, and range from less than significant with mitigation incorporated to significant and unavoidable, depending on the viewshed. Variations in impact significance are due to the fact that duration of views is not the only factor used in determining Project impacts. Other considerations include the visual quality of the viewshed (e.g., industrial, representative, or distinctive); viewer exposure (e.g., landscape visibility, viewing distance, viewing angle, extent of visibility, and duration of view); viewer type and volume (e.g., motorist, recreationalist, small/medium/high number of

views); and the degree of visual change caused by construction of the Project (e.g., visual contrast, project dominance, and view blockage or impairment).

The comment states that the City has plans for expansion of its extensive walking trails and bike path network, but does not state to what plan the comment is referring, nor does it state what planned walking trails and bike paths would be impacted by the Project that are not analyzed in the Draft EIR. Setting information and analysis of potential impacts to bike paths in the study area is provided in Draft EIR Section 4.17, *Transportation and Traffic*. The analysis of impacts to bike paths considers the bike paths identified in Fontana General Plan Figure 10-4, *Existing and Proposed Bikeway System*. Setting information and analysis of potential impacts to walking trails and recreational areas are analyzed in Draft EIR Sections 4.1 (*Aesthetics*) and 4.16 (*Recreation*). City of Fontana recreational areas analyzed in the Draft EIR were drawn from several sources, predominantly the Parks, Recreation & Trails Element of the City of Fontana General Plan (2003), which includes Figure 10-1, *Existing and Planned Future Parks*, and Figure 10-3, *Recreation Trails*. Information was also gathered via personal communication with park coordinators (Cloke, 2011; Wolf, 2011).

Additional information about future plans in the Project area is included in Draft EIR Chapter 6, *Cumulative Impacts*. A list of past, present, and reasonably foreseeable future projects, the impacts of which could interact with those of the Project, is provided in Table 6-1 (Draft EIR, p. 6-4). Cumulative projects were identified based on review of local, regional, and statewide planning documents and environmental analyses that have been adopted or certified (including the Fontana General Plan), in addition to personal communication with City of Fontana staff (Fahie, 2011; Molinos, 2010a; Molinos, 2010b). No additional future plans for expansion of walking trails or bike path networks were identified in this process.

- B-5.3 See MR3(B) regarding the possible underground installation of the proposed subtransmission line at key view corridors, including along South Highland Avenue and San Sevaine Road. See also MR2 for discussion of a proposed alternate route at this location.
- B-5.4 An overview of the CPUC's decision-making process was presented during the April 14, 2011, Scoping Meeting. The powerpoint slides presented at the Scoping Meeting were provided in Appendix A of the Scoping Report (see Draft EIR, p. A-38 et seq.). In exercising its discretion to approve or deny the Project, the CPUC will consider and evaluate all relevant evidence in the administrative record, including all of the alternatives presented in the EIR and factors warranting adoption of those alternatives. As indicated on Draft EIR pages A-46 and A-47, conclusions reached during the environmental review process are one of several factors to be considered in the decision-making process. It would be premature before the EIR is certified to predict how the Commission will weigh the relevant environmental and other factors in reaching its decision.

See MR1(B) for a discussion of Alternative 1 as the Environmentally Superior Alternative.

Regardless of whether Alternative 1 ultimately is approved, the route of the subtransmission line has been clarified in response to this comment. The fifth and sixth sentences of the second paragraph on page 2-1 of the Draft EIR are revised as follows:

The new 66 kV subtransmission line would leave Alder Substation and parallel West Casmalia Street until it reaches the boundary line of the City of Fontana and the City of Rialto Mango Avenue. The subtransmission line would then traverse north to intercept and follow along the future extension of Mango Avenue until it reaches the Falcon Ridge Substation.

- B-5.5 The 13 acres of new ROW for the subtransmission source lines and access roads would be located along South Highland Avenue, San Sevaine Road, the future extension of Mango Avenue, West Casmalia Street, and Locust Avenue. See also Response A-1.45 and Final EIR Figures 2-3a, 2-3b, and 2-3c for further detail.

The EIR analyzes the Project as proposed without regard to the necessity for each separate component (or the overall proposal) when the requested approval is a Permit to Construct. Therefore, the CPUC did not inquire as to the Applicant's rationale for proposing a new access road in the vicinity of South Highland Avenue and San Sevaine Road. The City's opinion about relative construction costs and visual impacts is noted.

- B-5.6 As discussed in Response B-5.1, the CPUC considered input received from the City during the preparation of the Draft EIR. For a discussion of undergrounding of the proposed subtransmission line at key view corridors, including along South Highland Avenue and San Sevaine Road, see MR3(B). See also MR2 for discussion of a proposed alternate route at this location.

- B-5.7 The comment disagrees with the references to agricultural development and agricultural land in the discussion of the visual qualities of the Project area in Draft EIR Section 4.1, *Aesthetics*. As stated on Draft EIR page 4.1-2, "The visual study area, shown in Figure 4.1-1, was delineated based on a site visit conducted by ESA on August 18, 2010 (ESA, 2010). During this site visit, ESA staff surveyed locations from which the Project area would be visible." While not a major feature in the visual landscape, land currently used for agricultural purposes (primarily row crops) was observed in select locations in the vicinity of the Project area, including west of Cherry Avenue and east of San Sevaine Road, between South Highland Avenue and Baseline Avenue.

Based on the August 18, 2010 site visit, the visual character of areas surrounding the subtransmission source line routes was generally characterized as falling within one of two distinct visual contexts: urban/developed or vacant/open space/agricultural. As described on Draft EIR page 4.1-7, the vacant/open space/agricultural designation was used to describe land in the vicinity of the Project that allows for greater opportunity for

long-range middleground and background views of the distinctive San Bernardino Mountains and San Gabriel Mountains, due to the lack of urban development. Vacant/open space/agricultural land is generally disturbed by human influence, including the presence of overhead electrical lines, transportation infrastructure, graded or disturbed areas, and/or past or present agricultural activity. Nonetheless, to address stated concerns that the Draft EIR mischaracterizes non-agricultural land, specific references to agricultural areas in Draft EIR Section 4.1 have been clarified, when the land is not currently being used for agricultural purposes:

Page 4.1-2, fourth paragraph, fifth sentence:

However, other locations provide a wider viewshed with views of the Project area from relatively greater distances, including from locations characterized by undeveloped open space agriculture, vacant land, or parks.

Page 4.1-6, second full paragraph:

...The visual quality of the site is representative and characteristic of vacant and undeveloped agricultural land in the study area.... Surface terrain is characterized by undeveloped agricultural and open space land covered with grass and brush (see Figure 4.1-2a, Photo A).

Page 4.1-7, second full paragraph:

... The visual character of areas surrounding the subtransmission source line routes can be generally characterized as falling within one of two distinct visual contexts: urban/developed and vacant/open space/agricultural, as discussed below. Figure 4.1-1 delineates the locations of these visual contexts, which were determined during the August 18, 2010 site visit.

Page 4.1-7 to 4.1-8, fifth full paragraph:

Vacant/open space/agricultural land in the vicinity of the Project is generally disturbed by human influence, including the presence of overhead electrical lines, transportation infrastructure, graded or disturbed areas, and remnants of past or present agricultural activity (see Figure 4.1-2b, Photos G and H). Vacant/open space/agricultural areas, however, provide greater opportunity for long-range middleground and background views of the distinctive San Bernardino Mountains and San Gabriel Mountains, which form the character-defining backdrop for the region. While uncommon, northeasterly to northwesterly views of agricultural land that are unencumbered by visual disturbances (e.g., transmission towers, construction grading, highway overpasses and adjacent development) represent the most unique and high-quality views in the study area due to their bucolic nature. Generally, these areas are representative of

undeveloped areas ~~or agricultural development~~ in the Project area, with distinct views from select locations.

Page 4.1-8, under subheading *Nighttime Light Environment*, second sentence:

Even in vacant or undeveloped ~~agricultural land~~ uses within the study area, nighttime lighting is likely to be intense due to the close proximity of existing light sources.

Page 4.1-9, third paragraph:

Although these corridors provide views of scenic mountains in the background, the visual quality of landscape surrounding the scenic corridors is generally representative, as they are surrounded by the suburban, and/or developed, ~~and/or agricultural development~~ land described above under *Land Use and Development Pattern*.

Page 4.1-29, under subheading *SR 210 and I-15*, eighth sentence:

Foreground features include open space, undeveloped ~~agricultural~~ areas, and highway structures such as light poles and signage.

- B-5.8 The commenter asserts that the visual simulation photographs of the Project (a) do not provide a fair representation of the neighborhoods that would be impacted, (b) are not accurate depictions of the environment/view corridors in which the subtransmission lines would be located, and (c) are taken along the existing and proposed transmission lines and not perpendicular to the transmission lines to show the impact the view corridors that run north and south. The comment further provides language from the City of Fontana General Plan regarding scenic view corridors, and photographs taken from scenic corridors in the vicinity of the Project.

The scenic value of the San Bernardino and San Gabriel Mountains is recorded throughout Draft EIR Section 4.1, *Aesthetics*, starting on page 4.1-6, which states: “The dominant topographic landforms in the study area are the visually distinctive San Bernardino and San Gabriel Mountains, which rise steeply to the north of the Project area; and the Jurupa Hills, which are at a greater distance to the south and more subdued in form. The San Bernardino and San Gabriel Mountains form the primary backdrop in views from most places on the valley floor that do not have foreground or middleground view obstacles (e.g., large trees, tall buildings, elevated freeways, etc.)”

Furthermore, in the discussion of motorists on major or scenic travel routes (page 4.1-9), the Draft EIR highlights the same designated scenic corridors identified in the comment, and includes additional corridors reflecting the importance of views of the mountains: “[T]he General Plans for the cities of Fontana, Rancho Cucamonga, and Rialto identify scenic corridors for special design treatment (City of Fontana, 2003; City of Rancho

Cucamonga, 2010; City of Rialto, 2010). The following scenic corridors are located in the visual study area:

- North-south routes: Beech, Sierra, Citrus, Cherry, and Etiwanda Avenues
- East-west routes: Foothill Boulevard; Wilson, Baseline, and Highland Avenues
- Major freeways: Interstate (I)-15 and State Route (SR) 210”

In its discussion of scenic vistas, the Draft EIR acknowledges that the cities of Fontana, Rialto, and Rancho Cucamonga generally define major north-south arterial roads as view corridors, reflecting the importance and value of northerly views of the mountains (Draft EIR page 4.1-10). Therefore, although scenic vistas are generally considered to be a location from which the public can experience unique and exemplary high-quality views (typically from elevated vantage points that offer panoramic views of great breadth and depth), the Draft EIR considers scenic vistas in the study area as including those scenic view corridors discussed above under *Motorists on Major or Scenic Travel Routes*. As such, the Draft EIR takes into consideration the scenic view corridors described in the City of Fontana General Plan, including the specific roadways designated as scenic corridors and highways, and other roadways oriented such that they provide scenic views of the mountains.

As discussed in Response B-5.2, the choice of viewsheds and viewer types analyzed in the Draft EIR is driven by a number of factors, including that visual sensitivity is characteristically more pronounced in areas of more distinctive visual quality, such as designated scenic highways, designated scenic roads, parks, and recreation and natural areas. In areas of more indistinctive or representative visual quality, sensitivity to change tends to be less pronounced, depending on the level of visual exposure (Draft EIR page 4.1-2). The simulations in the Draft EIR provide a fair representation of the visually sensitive viewsheds that would be impacted by the Project. As described on Draft EIR page 4.1-10, “Key observation points (KOPs) were established to provide a representative cross-section of affected landscapes in the visual study area. KOPs were selected based on the Project’s viewshed, visual exposure, and important viewer groups...” In addition to views from three recreational areas, the Draft EIR provides simulations for four of the scenic corridors identified above, including two north-south routes (Sierra Avenue and Citrus Avenue), and two east-west routes (Baseline Avenue and Highland Avenues). Views depicted in the simulations for these four scenic corridors are representative of views from other scenic corridors. For example, visual changes to scenic views from the Beech Avenue and Cherry Avenue scenic corridors would be similar to those shown for Citrus Avenue (Draft EIR Figure 4.1-5), and the visual change to viewers on Foothill Boulevard and Wilson Avenue would be similar to those shown for Baseline Avenue (Draft EIR Figure 4.1-6).

The commenter expresses the opinion that the Draft EIR simulations are not accurate depictions of the environment/view corridors in which the subtransmission lines would

be located, because they are taken along the existing and proposed subtransmission lines and not perpendicular to the subtransmission lines. For example, the comment provides photographs showing views from Baseline Avenue looking west along the designated view corridor, and photographs of views from Citrus Avenue looking north along the designated view corridor, with the recommendation that the Draft EIR include simulations showing views from these perpendicular orientations. However, from these locations a simulation showing the view perpendicular to the Project would actually minimize the visual effects of the Project, because it would show just the subtransmission conductor traversing the road. It would not capture the full effect of installation of a new subtransmission corridor with dozens of poles and miles of conductor. For this reason, in the Draft EIR the directions of simulation photos were conservatively chosen to capture the viewsheds with the highest degree of change, and hence the highest degree of visual impact. For example, Draft EIR Figure 4.1-6 shows the existing and simulated view from Baseline Avenue near Heritage Intermediate School looking northwest (KOP 2), to show a wide swath of subtransmission line visible from this location. Similarly, Draft EIR figure 4.1-5 shows the existing and simulated view from Citrus Avenue looking east down the subtransmission corridor, to capture the viewshed with the greatest visual change. For this reason, the CPUC acknowledges the receipt of the commenter's additional setting photos, but will not create new simulations to depict additional vantage points from the chosen KOPs.

Regarding the commenter's suggested mitigation to underground portions of the subtransmission alignment, see MR3.

As noted in Response B-5.1, the CPUC received and considered the City's prior letters.



City of Rialto

California

March 12, 2012

Mr. John Boccio
 Falcon Ridge Substation Project
 c/o ESA 225 Bush Street, Suite 1700
 San Francisco, CA 94104

Sent Via Facsimile (415) 896-0332

Re: Falcon Ridge Substation Project (A.10-12-017) SCH No. 2011041009

Dear Mr. Boccio:

The City of Rialto has several concerns regarding the proposed Falcon Ridge substation project. The California Public Utilities Commission (CPUC) has prepared a Draft Environmental Impact Report (DEIR) for consideration of an application by Southern California Edison (SCE) to construct a new 66 ½ kilovolt (kV) substation in north Fontana and two 66 kV sub-transmission electrical lines to power the substation. The three mile electrical line to connect the proposed substation to the existing Alder station is proposed to be constructed above ground in the right-of-way in the City of Rialto. The City of Rialto is opposed to above ground construction because:

- The project will have a negative impact on Aesthetics. Using non-reflective wires will not address the negative impact caused by the poles. The poles will have a negative visual impact on Locust Avenue and Casmalia Street which serve as the gateway to the City's regionally significant Renaissance Rialto project. The proposed project will result in poles on both sides (north and south) of the I-210 freeway. The cumulative negative impact to the Rialto community has not been addressed in the DEIR.
- The project will have a negative impact on Land Use/Planning. The proposed project is not compatible with the development standards of the City of Rialto and must be mitigated. All new development in Rialto is required to place electrical transmission lines underground. Acceptable measures to mitigate the negative impact to Land Use/Planning are: 1) underground the proposed utility lines; 2) pay the cost to

B-6.1

B-6.2

B-6.2 (cont.)

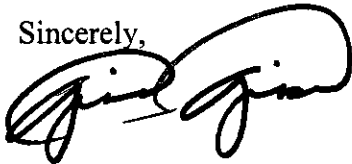
underground the proposed utility lines to the City of Rialto; or 3) modify the proposed project to utilize existing infrastructure.

- The City of Rialto proposed a project alternative utilizing existing infrastructure. The alternative is listed in the DEIR as the environmentally superior project alternative. The DEIR gives no valid reason for supporting the proposed project versus the environmentally superior alternative. The City's alternative utilizes existing infrastructure and would only require new poles along Lowell Avenue from Locust Avenue to Alder Avenue which is a substantially smaller distance than the Edison proposed route and has no negative impact to Aesthetics or Land Use/Planning.

B-6.3

The City of Rialto is requesting that the DEIR be amended to include the recommended mitigation measures listed herein and address the negative impact to Aesthetics and Land Use/Planning.

Sincerely,



Gina M. Gibson
Senior Planner

cc: Michael E. Story, City Administrator
Robb Steel, Assistant to the City Administrator/ Development Services Director
Greg Lantz, Economic Development Manager

2.6.7 Letter B-6 – Responses to Comments from City of Rialto

B-6.1 Regarding Mitigation Measure 4.1-1, which requires the use of non-reflective insulators and conductors, see Response B-5.1.

Regarding concerns about visual impacts to Casmalia Street, Locust Avenue, and I-210, as described in Section 4.1, *Aesthetics*, public viewer groups evaluated in the Draft EIR include motorists along major or scenic roadways, visitors to parks and recreational areas, and visitors to scenic vistas. I-210 is identified as a major roadway and scenic corridor in the visual study area and is described on Draft EIR page 4.1-9, and analyzed under Impact 4.1-1, which pertains to adverse effects on a scenic vista (Draft EIR, p. 4.1-29 et seq.). The commenter correctly notes that the Project would construct poles on both the north and south sides of I-210, as it would traverse the highway in two locations. However, as described in the Draft EIR, impacts to the I-210 viewshed would be less than significant for the following reasons: “The addition of new subtransmission poles and conductor would cause a small but perceptible increase in structure prominence and industrial character within the landscape, as motorists approach and drive under the proposed subtransmission source line. Other features in the viewshed would co-dominate or dominate views, including transmission lattice structures and conductor. The narrowness of poles and conductor would prevent the Project from blocking scenic vistas in the background. The overall visual change at both crossings of I-210 would be moderate. In consideration of I-210’s high visual sensitivity, the resulting visual impact would be adverse and potentially significant. However, per the definition of ‘adverse and potentially significant’ in Table 4.1-2, site-specific circumstances determine whether the impacts are perceived as negative and exceed environmental thresholds. In the case of views from I-210, because the highway is oriented east-west, the viewer would experience the change in an urbanized context of surrounding development. For viewers looking north towards the mountains (i.e., the scenic views), the visual change would be experienced only very briefly, while approaching and crossing under the subtransmission source line. Actual impacts at this [key observation point] would be adverse but less than significant.”

Draft EIR Figure 4.1-2a, Photo B, shows a setting photo of Alder Substation at the intersection of West Casmalia Street and North Locust Avenue. However, neither Casmalia Street nor Locust Avenue is identified as a major roadway or a scenic corridor in the Draft EIR because neither are designated as such in the City of Rialto General Plan (2010). According to the City of Rialto General Plan, Locust Avenue is a Secondary Arterial, and Casmalia Avenue is a Collector Street. Per the City of Rialto General Plan, “Secondary Arterials have two lanes of travel in each direction and left-turn lanes, and typically accommodate or accommodate intermediate traffic speeds. Travel lanes must be narrower than on Major Arterials... Although through traffic will utilize Secondary Arterials, their primary purpose is to link Local Streets with Major Arterials... Collector Streets provide a transition between Local Streets and higher-speed arterial roadways.

These roadways typically have one travel lane in each direction and low design speeds... As their name implies, Collector Streets collect local traffic for delivery to Arterials.”

Per the City of Rialto Draft Renaissance Specific Plan, Locust Avenue and Casmalia Avenue in the vicinity of the Project are Secondary Arterials, defined as follows:

“Secondary Arterials are smaller than Major Arterials but are extremely important in creating a backbone circulation system. They serve as the primary roadways within Renaissance, carrying the majority of traffic into and throughout the site.”

Neither Casmalia Street nor North Locust Avenue is identified in the City of Rialto General Plan, nor the City of Rialto Draft Renaissance Specific Plan, as having a scenic designation; they are not designated major or minor gateways, or scenic corridors (Exhibit 2.4 – Community Design, City of Rialto, 2010). North Locust Avenue, because of its north-south orientation, does provide views of scenic San Bernardino Mountains to the north. However, as shown in Draft EIR Figure 4.1-2a, Photo B, the portion of the Project on North Locust Avenue is adjacent to the existing Alder Substation, in a location with prominent industrial features. For this reason, Locust Avenue was not analyzed as a scenic location in the Draft EIR.

Cumulative impacts to visual resources are analyzed in Draft EIR Chapter 6, Section 6.2.1, page 6-7 et seq. The Project’s incremental contribution would be cumulatively considerable to scenic vistas along the following scenic corridors: Cherry Avenue, Beech Avenue, Citrus Avenue, Sierra Avenue, Highland Boulevard, and I-210.

- B-6.2 See MR3(A) for discussion of compatibility with the City’s development standards regarding undergrounding.
- B-6.3 Regarding Alternative 1, designated in the Draft EIR as the Environmentally Superior Alternative, see MR1.



Fontana Unified School District

9680 Citrus Avenue · P.O. Box 5090 · Fontana · CA 92334-5090 (909) 357-5000

January 27, 2012

Mr. John Boccio
Falcon Ridge Substation Project
c/o Environmental Science Associates
225 Bush Street, Suite 1700
San Francisco, CA 94104
FalconRidge@esassoc.com

Re: FALCON RIDGE SUBSTATION DRAFT EIR (sent via email)

The District has the following comments regarding the Draft EIR:

Title 5 Requirements

The Draft EIR does not address Title 5 requirements, and does not evaluate the placement of the transmission lines at the proposed locations in light of those requirements. Title 5 of the California Code of regulations (article 2, section 14010) provides, in part:

- c. The property line of the site even if it is a joint use agreement as described in subsection (o) of this section shall be at least the following distance from the edge of respective power line easements:
 1. 100 feet for 50-133 kV line.
 2. 150 feet for 220-230 kV line.
 3. 350 feet for 500-550 kV line.

B-7.1

The District requests the EIR include these requirements and verify that the proposed project does not violate these requirements.

Future FUSD Elementary School Site within 450 Feet of Proposed Project

The District has a reserved elementary school site within 450 feet of the proposed project location. This site is not included in Figure 4.15-1, the listing of schools within 0.5 mile of the project. Although it is not an active school, it is expected to be developed in the future and therefore it is reasonable to include it on the list of sites. This site is located outside of the 350 foot requirement listed above, but given the proximity the District wants to emphasize that any future changes, revisions, or additions to the project would need to maintain those minimum distances. Please see the enclosed map for a depiction of the future school site and the proposed project location.

B-7.2

B-7.3

BOARD OF EDUCATION

Kathy Binks
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SUPERINTENDENT

Cali L. Olsen-Binks

Telecommunications Device for the Deaf (909) 357-5018

Mr. Boccio
1/27/2012
Page 2

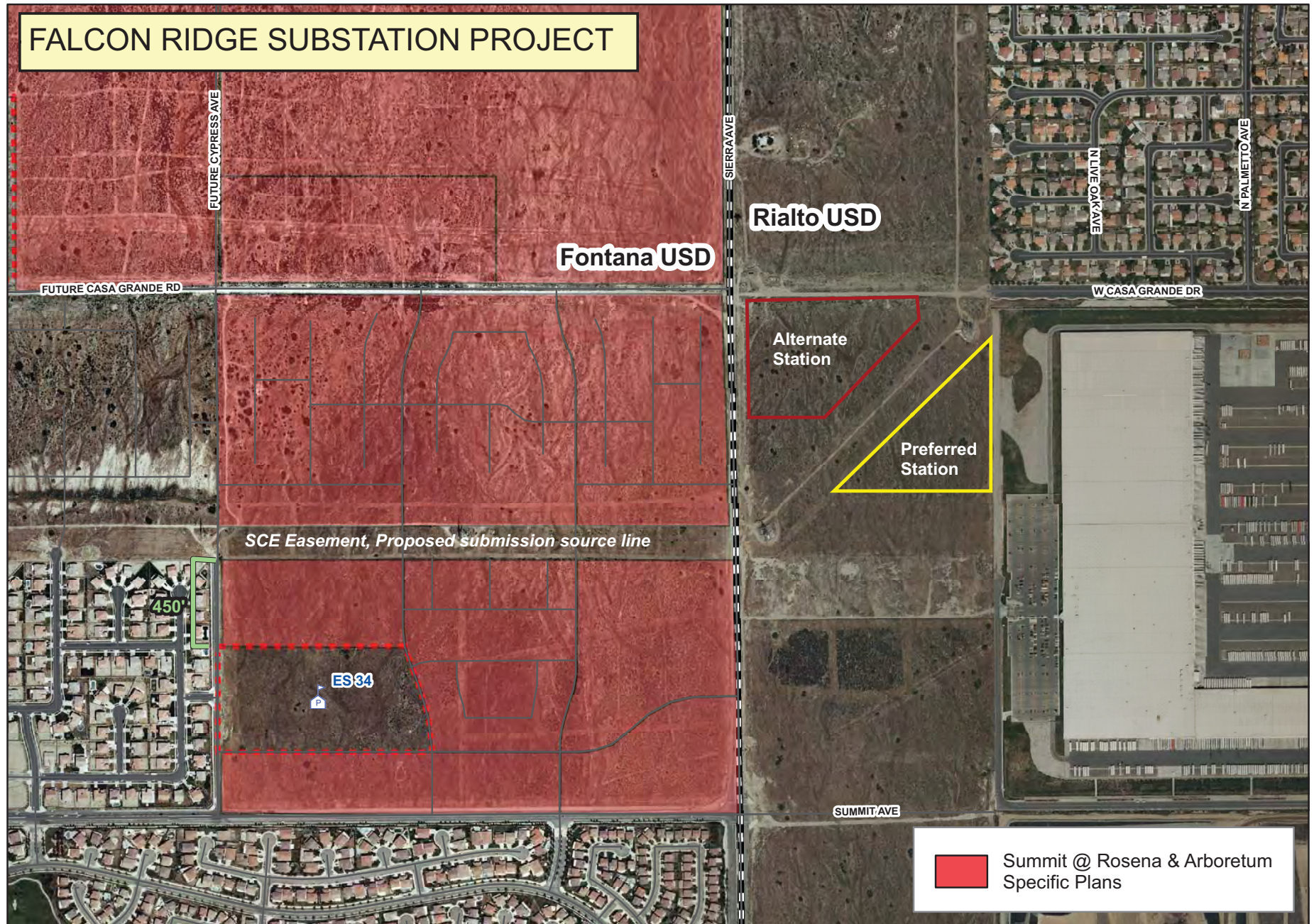
The District appreciates the opportunity to comment on the proposed project.

Please do not hesitate to contact me with any questions, (909) 357-7528.


Sincerely,
Robert Copeland
Director, Facilities Planning, Design, Construction, Maintenance & Operations
Fontana Unified School District
9851 Catawba Avenue
Fontana, CA 92335

Encl.

FALCON RIDGE SUBSTATION PROJECT



2-195

 Summit @ Rosena & Arboretum Specific Plans

2.6.8 Letter B-7 – Responses to Comments from Fontana Unified School District (FUSD)

- B-7.1 Title 5, Article 2, of the California Code of Regulations, pertains to the standards for the selection of new school sites, not the selection of power line easements. Therefore, although the requirements quoted in the comment letter have been included in the administrative record for this Project, these regulations are not applicable to the proposed Project.
- B-7.2 Draft EIR Figure 4.15-1 (p. 4.15-2) depicts existing public services facilities; therefore, it would not be appropriate to show the reserved elementary school site on this figure. However, the future school site is listed as a proposed school site in Section 4.9 of the Draft EIR, *Hazards and Hazardous Materials*, on page 4.9-9.
- B-7.3 Commenter correctly notes that the future school site is located beyond Title 5's requirements regarding proximity to 500-550 kV power line easements. The proposed 66 kV subtransmission line would be constructed within the existing 500 kV transmission right-of-way; therefore, development of the Project in the proposed location would occur at an appropriate distance from the future school site.

Lewis Operating Corporation, LLC

1156 North Mountain Avenue / P. O. Box 670 / Upland, California 91785-0670
Telephone: (909) 985-0971 FAX: (909) 949-6700

February 7, 2012

Mr. John Boccio
Environmental Science Associates
225 Bush Street, Suite 1700
San Francisco, CA 94104

RE: Response to Falcon Ridge Substation Project DEIR

Dear Mr. Boccio,

Lewis Operating Corp., and its related entities, is a large land owner adjacent to Southern California Edison's (SCE) existing 500 kV transmission line and transmission ROW from the proposed Falcon Ridge Substation spanning west to Lytle Creek Rd in the City of Fontana. We have reviewed the Draft Environmental Impact Report (DEIR) for the Falcon Ridge Substation Project and have the following comments:

1. Section 2.6.2 Subtransmission Source Lines: The approximately 9 mile long Etiwanda Subtransmission Line Route bisects an existing master planned community, Shady Trails, located between Lytle Creek Rd and Citrus Ave in the City of Fontana. There is concern that depreciating land values will occur due to the proximity and visual impacts of the proposed overhead line and pole positions. In addition, the proximity of the proposed aerial lines will impact current and future residences with an increase in "static" noise created when the aerial source lines become polluted with dirt and sediment and exposed to increased temperatures in this region. Considering there are no physical or jurisdiction constraints preventing the proposed 66 kV source lines and poles to be placed underground, SCE should place the proposed facilities underground from the stretch between Citrus Ave to Lytle Creek Rd in the City of Fontana.

| C-1.1
 | C-1.2
 | C-1.3

2. Section 2.6.3: The third paragraph states that Figure 2-2 shows the locations of all new poles when in fact Figure 2-2 only generally depicts that easement area and does not identify the specific locations of the approximately 300 proposed poles. Due to the proximity of existing and future residences, please provide further details regarding the locations of the proposed poles (i.e. distance from existing aerial facilities, setbacks from property lines etc...), specifically from Sierra Ave to Lytle Creek Rd in the City of Fontana.

| C-1.4

In addition, the DEIR does not provide the pole specification proposed at each location. Figure 2-5 shows 13 different steel pole subtransmission structures. In order to fully understand the proposed project and related impacts, please provide the specification of the subtransmission structures at each location.

| C-1.5

3. 2.6.4 Telecommunication Description: One new fiber optic route is being proposed to connect the Falcon Ridge Substation to the Etiwanda Substation, and as described, the majority of the proposed fiber optic line is being proposed as an aerial line. Proposing an additional aerial line exacerbates the negative impacts associated with the unsightly aesthetics of the proposed 66 kV lines. Considering there are no physical or jurisdiction constraints preventing the proposed fiber optic line to be placed underground, SCE should strongly consider placing the proposed facilities underground from the stretch between Citrus Ave to Lytle Creek Rd in the City of Fontana.

C-1.6

4. Section 2.7 Right of Way Requirements: 13 acres of new easement rights are required to accommodate the new transmission lines, but the DEIR does not provide the locations. Please provide additional information outlining where the additional land is located for SCE's additional easement rights.

C-1.7

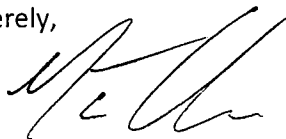
5. Transformer Locations: The DEIR does not clearly identify the locations of any proposed above ground transformers or structures required to serve the proposed subtransmission source lines. If applicable, please provide locations and impacts to existing and future streets, landscaping and private property.

C-1.8

Lewis Operating Corp. considers SCE as a partner in the community and in the land development process, so we appreciate the opportunity to comment on this project and associated DEIR. We anticipate this will be a successful project with the incorporation of the aforementioned changes which will help to ensure the project and DEIR considers all impacts to the surrounding property owners.

Please do not hesitate to contact me for further clarification regarding this matter at (909) 579-1282.

Sincerely,



Garth Chambers

Cc: City of Fontana- Don Williams, Community Development Director

2.6.9 Letter C-1 – Responses to Comments from Lewis Operating Corporation, LLC

- C-1.1 As described in the Draft EIR, Appendix A, *Scoping Report*, on page A-22, “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 concerns related to land values.
- C-1.2 Noise-related impacts of the Project and alternatives to current residents are analyzed in Section 4.13 of the Draft EIR (p. 4.13-12 et seq.) and, relative to past, present, and reasonably foreseeable future residents in Section 6.2.13 (p. 6-17 et seq.). The closest noise-sensitive receptors to the subtransmission source line segment are identified in Section 4.13.1 (see, e.g., p. 4.13-6). Among these, the closest residential receptors within the City of Fontana would be approximately 30 feet from the Etiwanda Subtransmission Source Line Route generally west of Cypress Avenue; within the City of Rancho Cucamonga, the closest residences would be approximately 50 feet from the Etiwanda Subtransmission Source Line Route north of Arrow Route and south of Foothill Boulevard; and, within the City of Rialto, the closest residences would be approximately 600 feet south of the Alder Subtransmission Source Line Route. As discussed under Impact 4.13-2 on page 4.13-15 and Impact 4.13-4 on page 4.13-18 of the Draft EIR, the closest residential receptor to the subtransmission source line would not be expected to be exposed to corona-related noise exceeding 34 dB. This noise level is well below the existing daytime ambient noise in the Project vicinity and would not be expected to increase nighttime ambient noise exposure. It is also noted that corona noise levels associated with the proposed Project would be substantially less than levels associated with the existing 500 kV transmission line that would parallel the Etiwanda Subtransmission Source Line route.
- C-1.3 The EIR considers environmental factors in addition to other feasibility considerations. For a discussion of undergrounding at specific locations, see MR3(C).
- C-1.4 When a proposed project could have a significant adverse effect on the environment, an EIR should be prepared as early as feasible in the planning process to enable environmental considerations to influence project design and yet late enough to provide meaningful information for environmental review (CEQA Guidelines §15004(b)).

Draft EIR Figure 2-2 (p. 2-5) identifies how many of the proposed poles would be installed in each portion of the subtransmission source line route; however, it does not provide the requested level of specificity. Draft EIR Figure 2-2 provides meaningful information for environmental review and allows for the conclusions of the environmental review to inform where specific individual poles would be located. In this

way, potential sensitive resources and/or hazards that are not currently known may be avoided. Visual simulations provided in Section 4.1, *Aesthetics*, adequately represent proposed poles in multiple locations along the subtransmission source line routes for purposes of the environmental analysis. Illustration of exact pole locations is not necessary in order to evaluate the potential impacts associated with the proposed Project. Nonetheless, in response to this comment, the first sentence of the fourth paragraph on page 2-12 of the Draft EIR is revised as follows:

Figure 2-2, *Proposed Project* shows the locations of the subtransmission source line segments and lists the type and number of all new poles within each segment.

- C-1.5 As noted in Response C-1.4, CEQA Guidelines section 15004(b) instructs that an EIR should be prepared as early as feasible in the planning process. Although the level of design detail requested in the comment is not yet available, the level of data and other information provided in the Draft EIR about the construction, operation, and maintenance of the Project, including the proposed subtransmission source lines, is adequate to inform decision makers and the public about the potential environmental effects of the Project. Each of the possible permutations of route segments, poles, and pole locations may be evaluated based on the information provided in the Draft EIR. The impact analysis documented in the EIR assumes that the reasonable maximum level of impact would occur, and so reaches appropriately conservative conclusions about the overall environmental effect of the Project, including its subtransmission source lines.
- C-1.6 The EIR considers environmental factors in addition to other feasibility considerations. For a discussion of undergrounding at specific locations, see MR3(C).
- C-1.7 The 13 acres of new ROW for the subtransmission source lines and access roads would be located along South Highland Avenue, San Sevaine Road, the future extension of Mango Avenue, West Casmalia Street, and Locust Avenue. See also Response A-1.45 and Figures 2-3a, 2-3b, and 2-3c for further detail.
- C-1.8 Above ground transformers would be located at the Falcon Ridge Substation. As shown in Draft EIR Figure 2-3 (p. 2-6) and described on Draft EIR page 2-7, the proposed Project would include two 28 MVA 66/12 kV transformers. The transformer area would be approximately 108 feet long by 64 feet wide by 25 feet high. Impacts of the Project, including the transformers, are analyzed on a resource-by-resource basis throughout Draft EIR Chapter 4; the analysis of cumulative impacts is provided in Chapter 6.

From: JHogan@hfinc.com
 To: [Falcon Ridge](#)
 Cc: jharris@jhaconsulting.net; dford@intexcorp.com; jpierson@intexcorp.com; EOune@HFInc.com
 Subject: Falcon Ridge Substation Project - Public Comment Meeting Follow-up
 Date: Friday, February 24, 2012 5:54:13 PM
 Attachments: [080183_EXHIBIT-SCE-02-SCE_36x48_Portrait.pdf](#)
[2011-10-11_Highland-San_Sevaine_SCE_Alignment-03.pdf](#)

Mr. John Boccio:

As you will recall, I spoke at the public comment meeting at Summit High School last Thursday, Feb. 16, 2012. I suggested that the project proponents consider a variation of the alignment for the proposed 66 KV transmission line in the vicinity of S. Highland Ave. and San Sevaine Road. I provided copies of two exhibits outlining the alignment variation that we are advocating.

After the meeting, you requested that I send you these exhibits via email.

Accordingly, please find attached two exhibits. One shows the overall Westgate Specific Plan, which covers nearly 1000 acres in north Fontana. Against this backdrop, we plotted the alignment of the proposed 66 KV transmission line (in red), and our proposed alternative alignment in blue.

The second exhibit is a magnification of an area of the specific plan showing the property at the northwest corner of South Highland Avenue and San Sevaine Road. This exhibit illustrates in more detail the two alignments. It also shows the segment north of the 210 Freeway along San Sevaine Road where we urge that the transmission line be placed underground.

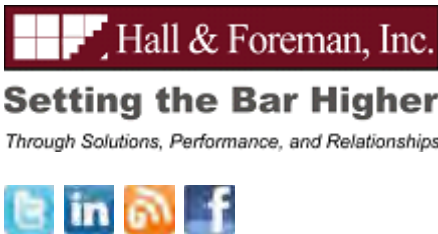
Intex Properties Inland Empire Corp., the owner of the majority of the property within the Westgate Specific Plan, will be submitting comments on the Falcon Ridge Substation Project in writing, including the reasons why we support the alignment variation depicted in these exhibits.

Meanwhile, if you have any questions or if you would like additional information, please contact the undersigned.

Thank you for your consideration of our request.

Sincerely,

John C. Hogan, P.E., LEED A.P.
 C.E.O. / Principal
 Hall & Foreman Inc.
 17782 17th Street, Suite 200
 Tustin, CA 92780-1947
 Direct: (714) 665-4507
 Mobile: (714) 390-7181



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C-2.1



WESTGATE SPECIFIC PLAN

& PROPOSED ALTERNATIVE ALIGNMENT

EXHIBIT: SCE















FALCON RIDGE SUBSTATION ALIGNMENT

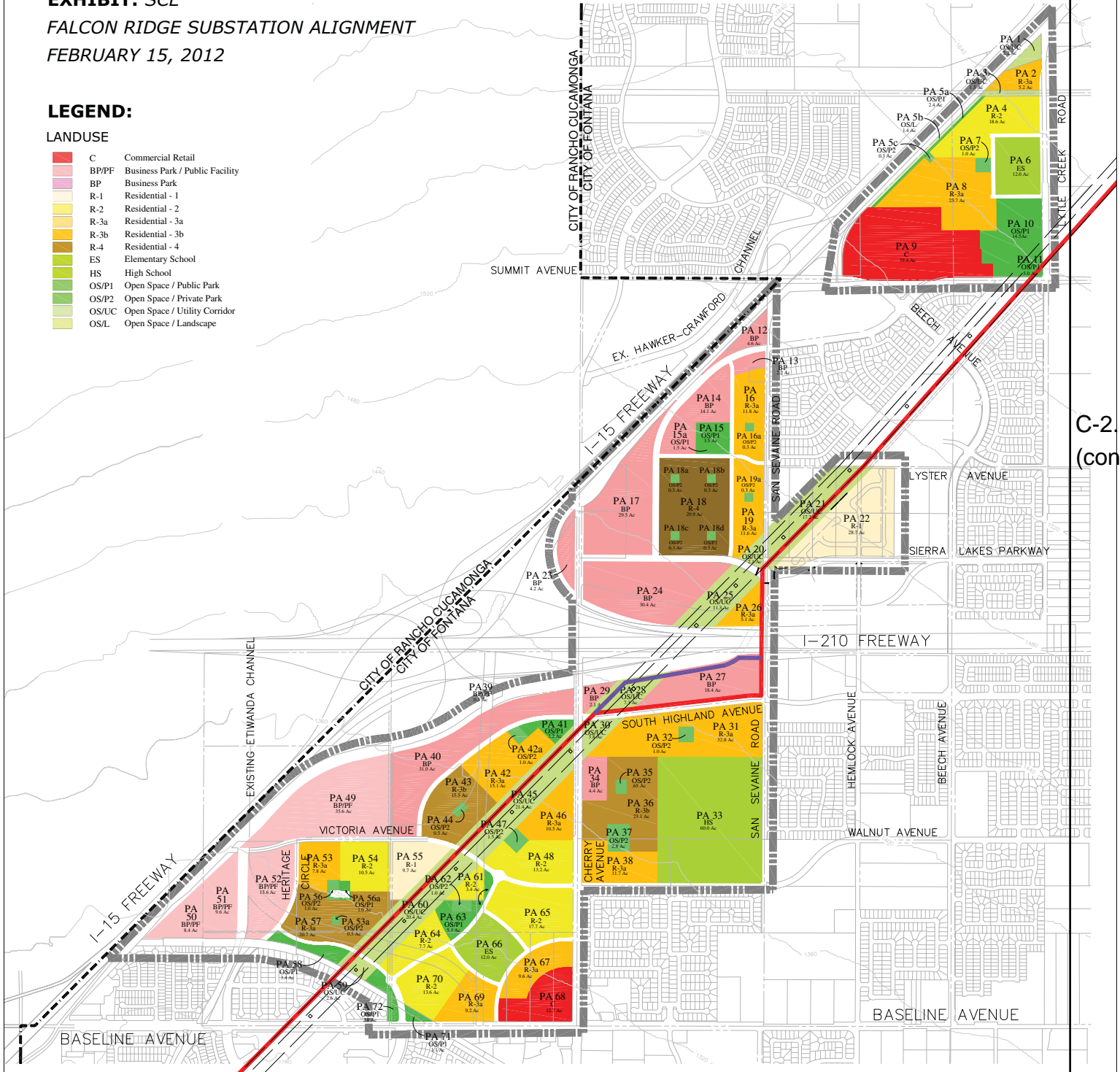
FEBRUARY 15, 2012

C-2

LEGEND:




LANDUSE

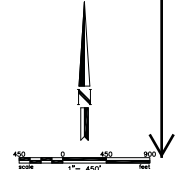
	C	Commercial Retail
	BP/PF	Business Park / Public Facility
	BP	Business Park
	R-1	Residential - 1
	R-2	Residential - 2
	R-3a	Residential - 3a
	R-3b	Residential - 3b
	R-4	Residential - 4
	ES	Elementary School
	HS	High School
	OS/P1	Open Space / Public Park
	OS/P2	Open Space / Private Park
	OS/UC	Open Space / Utility Corridor
	OS/L	Open Space / Landscape

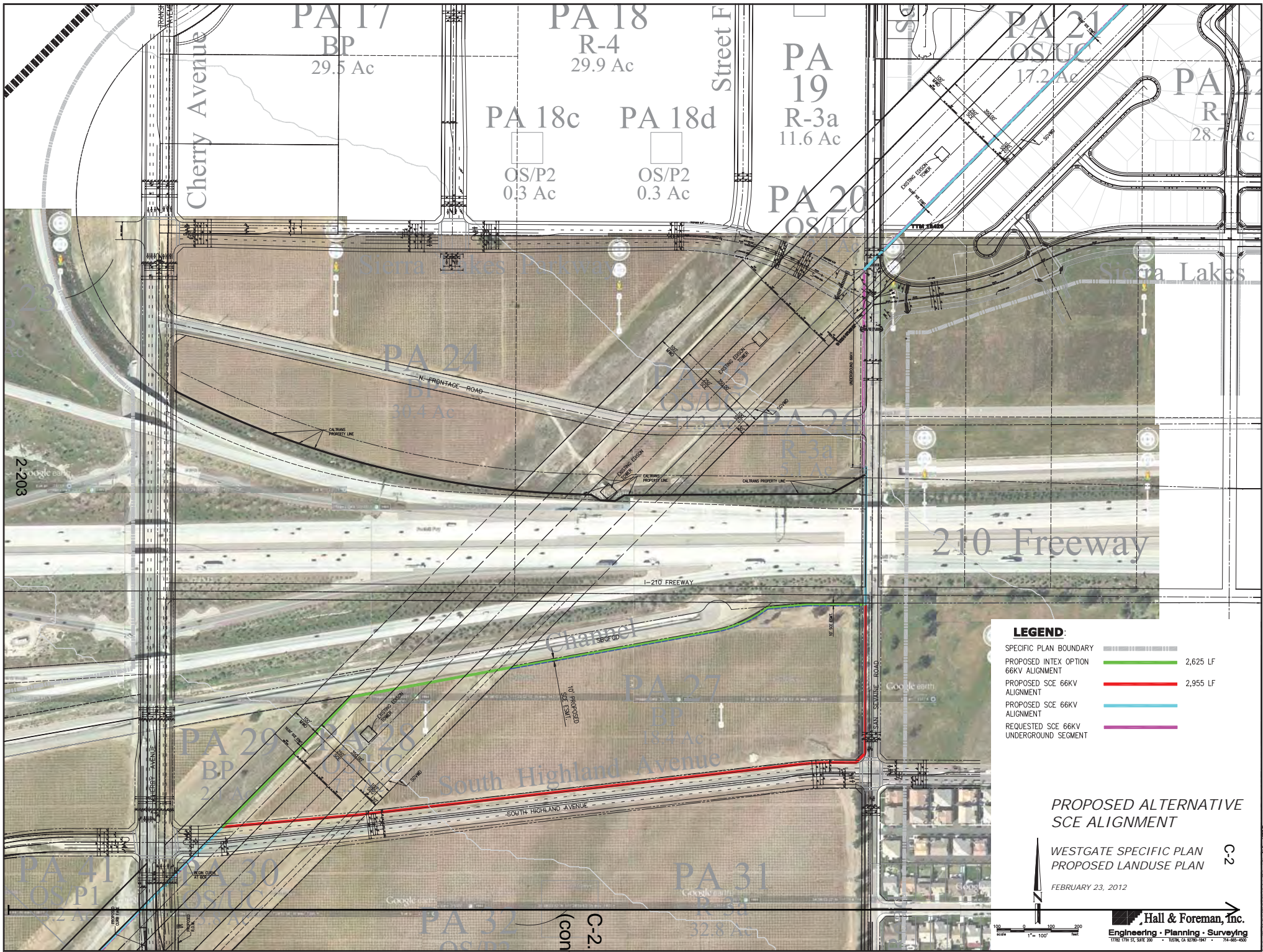


C-2.1 (cont.)

LEGEND:

	SPECIFIC PLAN BOUNDARY
	PROPOSED SCE 66KV ALIGNMENT
	PROPOSED ALTERNATIVE ALIGNMENT





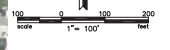
LEGEND:

- SPECIFIC PLAN BOUNDARY
- PROPOSED INTERCONNECT OPTION 66KV ALIGNMENT 2,625 LF
- PROPOSED SCE 66KV ALIGNMENT 2,955 LF
- PROPOSED SCE 66KV ALIGNMENT
- REQUESTED SCE 66KV UNDERGROUND SEGMENT

PROPOSED ALTERNATIVE SCE ALIGNMENT

WESTGATE SPECIFIC PLAN
PROPOSED LANDUSE PLAN

FEBRUARY 23, 2012



Hall & Foreman, Inc.
Engineering • Planning • Surveying
17181 17th St, Suite 200 • Torrance, CA 90504-1947 • 310-466-6000

C-2.1
(cont.)

C-2

2-203

2.6.10 Letter C-2 – Responses to Comments from Hall & Foreman, Inc.

- C-2.1 The proposed alternative subtransmission source line route is discussed and the potential impacts of its construction, operation, and maintenance are analyzed in MR2. See also MR3(C) for discussion of undergrounding of the subtransmission source line at specific locations.

March 9, 2012

VIA E-MAIL - [falconridge@esassoc.com],
FACSIMILE - (415) 896-0332,
FEDERAL EXPRESS and
FIRST CLASS MAIL

Mr. John Boccio
Falcon Ridge Substation Project; SCH No. 2011041009
C/O Environmental Science Associates (ESA)
225 Bush Street, Suite 1700
San Francisco, California 94104

**Re: Comments on the Legal Sufficiency of the Southern California Edison's
Falcon Ridge Substation Project; CPUC A.10-12-017; SCH No. 2011041009**

Dear Mr. Boccio:

This office represents the J.W. Mitchell Company, LLC ("J.W. Mitchell"), and is submitting this letter on its behalf to further expand upon our concerns regarding the legal sufficiency and level of analysis provided within the Draft Environmental Impact Report ("Draft EIR") for the Falcon Ridge Substation Project ("SCE Project") prepared pursuant to the California Environmental Quality Act ("CEQA").

J.W. Mitchell is the owner of the Summit at Rosena Project ("Vested Summit at Rosena Project"), consisting of approximately 179.8 acres, located north of Summit Avenue and bounded on the east and the west by Sierra Avenue and Cypress Avenue, respectively, in the City of Fontana. The Vested Summit at Rosena Project includes the approved Summit at Rosena Specific Plan ("Specific Plan") and the recorded Summit at Rosena Specific Plan Development Agreement ("Development Agreement"), providing J.W. Mitchell with a vested right to construct single-family residences, recreational and activity centers, an elementary school, and parks consistent with the approved development plan.

The Vested Summit at Rosena Project is currently bisected by the existing Southern California Edison Company ("SCE") right-of-way which runs from east to west through the site. Based on previous discussions with SCE and the Draft EIR, it appears that the existing SCE easement within the right-of-way will be widened, encroaching

C-3.1



Mr. John Boccio
March 9, 2012
Page 2

further into the project site, further impacting the design of the Vested Summit at Rosena Project.

C-3.1
cont.

The SCE Project, as currently designed, will significantly impact 46 residential lots that border the SCE right-of-way, the development of which have already been approved by way of the Specific Plan and a tentative map and vested by way of the Development Agreement. Land Advisors Organization, a brokerage firm with expertise in land economics and valuation issues, created a Lot Premium Analysis in order to provide J.W. Mitchell a deeper understanding of the potential financial impact that the above-ground transmission lines are likely to cause to the Vested Summit at Rosena Project. Each of the 46 lots located south of the existing SCE right-of-way will lose, on average, approximately 4.5% in value, which equates to approximately \$724,500.00 in lost revenue potential on these lots alone. For this and other reasons, the SCE Project will have a significant, quantifiable impact at the Vested Summit at Rosena Project.

C-3.2

We previously provided scoping comments to SCE in April of 2011 regarding our concerns related to land use, visual and aesthetic impacts, and alternatives analysis. Upon subsequent detailed review of the Draft EIR, we now have a number of concerns regarding the level of detail and analyses provided and believe the Draft EIR does not fulfill the necessary mandates pursuant to CEQA.

C-3.3

Executive Summary

• The executive summary references the SCE Project objectives that are utilized as reasons for the need of the project as well as a means of restricting the alternatives discussion within the Draft EIR. The objectives focus on electrical demand in the Electrical Needs Area beginning in 2014 due to an exceedance of the maximum operating limit capacity during periods of extreme heat in 2014.

C-3.4

Given the primary focus of this benefit to explain the need for the SCE Project, the document must contain additional details to illustrate why this is necessary, including a discussion clarifying anticipated periods of extreme heat in 2014. The analysis must clarify if the need is based upon planned growth in light of the slowdown in development that has occurred over the previous five years, as well as providing additional support detailing the lack of future capacity of the Alder and Randal Substation, based on recent growth patterns.

Introduction

• Section 1.6 provides a brief discussion of electric and magnetic fields. The narrative states that potential health effects from exposure to electric fields from transmission lines typically do not present a human health risk since electric fields are effectively

C-3.5

Mr. John Boccio

March 9, 2012

Page 3

shielded by materials such as trees, walls, etc. The section also states this impact is not significant based on the fact that there is no agreement among scientists that EMF creates a potential health risk, and there are no defined CEQA standards for defining health risk from EMF. The analysis then relies upon an example of three scientists working for the California Department of Health Services (DHS) and the fact there is disagreement between their conclusions as "proof" that this is not a potential impact caused by the proposed SCE Project.

The discussion related to the three scientist's review of the data on behalf of the DHS is misleading. According to the executive summary from the actual study (California EMF Risk Evaluation, June 2002), all three were inclined to believe that EMFs can cause some degree of increased risk of childhood leukemia, adult brain cancer, Lou Gehrig's Disease, and miscarriages, while also finding a number of other impacts such as birth defects, breast cancer, heart disease, and Alzheimer's were not related to EMFs.

The California Electric and Magnetic Fields Program states that while the evidence is still unclear as to any direct correlations between diseases and disorders related to EMF, studies have found correlation between biological cellular changes linked with electric magnetic field exposure. Furthermore, there have been continuing studies related to particular individuals who have at least a perceived heightened sensitivity to EMF (called Electromagnetic Hypersensitivity or EHS).

While it appears that studies are continuing at this time, nonetheless the California Department of Education included the following requirements related to transmission lines:

The California Department of Education enacted regulations that require minimum distances between a new school and the edge of a transmission line "right-of-way," or the area immediately surrounding lines that utility companies need to access the lines for maintenance and repairs. The setback distances are 100 feet for 50-133 kV lines, 150 feet for 220-230 kV lines, and 350 feet for 500-550 kV lines. These distances were not based on specific biological evidence, but on the known fact that the strength of electric fields from powerlines drops to near background levels at the specified distances, given that no other major sources are present. (Short Fact Sheet on EMF; California Electric and Magnetic Fields Program, 1999.)

The substantial evidence test requires that enough relevant information and reasonable inferences from the information provided supports a fair argument for the resulting conclusion. State CEQA Guidelines section 15384; *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal.3d 376, 393

C-3.5
cont.

Mr. John Boccio

March 9, 2012

Page 4

While the Draft EIR included some details regarding various studies, the thrust of the applicant’s argument focuses on the fact that information remains inconclusive as to the potential health effects of EMF. Yet studies in the area clearly continue and, in the case of the information submitted as evidence that EMF should not be discussed in the EIR, in reality the scientist’s believed that EMFs can cause some degree of increased health risks. Additionally, the Department of Education has provided guidelines for transmission lines in respect to schools and the California Public Utilities Commission (“CPUC”) has their own EMF design guidelines.¹ This clearly represents substantial evidence that fair arguments exist that electric and magnetic fields may present a health risk to the surrounding residential community and should have been addressed in greater detail within the Draft EIR. Moreover, portions of the proposed SCE Project will operate in close proximity to the existing lattice towers and thus should have been discussed as a potential cumulative effect.

C-3.5
cont.

As stated in the analysis, multiple sensitive receptors are located in close proximity to the SCE Project components. Therefore, either the Draft EIR must provide additional details and analysis to support the conclusions that any impacts related to electric and magnetic fields have no impact, or a detailed impact analysis should be included in the document for sufficient public review.

- Section 1.3.2 of the Introduction discusses the potential permit requirements that may be necessary as part of the overall SCE Project. However, there does not appear to be any discussion related to the use of eminent domain proceedings in order to obtain the new right-of-way as part of the proposed SCE Project. It is highly unlikely that SCE will accomplish all right-of-way acquisition through negotiated purchases. CEQA Guidelines Section 15124 requires an EIR to include a description of all discretionary actions required to implement the SCE Project. If eminent domain will be used, it must be listed as a potential discretionary action.

C-3.6

Project Description

- As long recognized by the California courts, “An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” *County of Inyo v City of Los Angeles* (1977) 71 Cal.App.3d 185, 193; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730. The project description must contain enough detail and information in order to ascertain the potential environmental impacts, assess ways of mitigating those impacts, and to consider appropriate project alternatives; however, the description should not supply extensive detail beyond what is needed for such an evaluation and review. See State

C-3.7

¹ See CPUC Decision D.06-01-042 requiring utilities to incorporate low cost or no cost measures for EMF control.

Mr. John Boccio

March 9, 2012

Page 5

CEQA Guidelines section 15124; *Sierra Club v City of Orange* (2008) 163 Cal.App.4th 523.

Without a stable and complete project description, it is impossible for the decision-makers and the public to adequately weigh and evaluate a project's environmental costs and benefits, meaningfully consider mitigation measures, or evaluate alternatives.

While the description does contain pages of details related to the associated equipment and construction installation process, which does little to help in the assessment of potential physical impacts, it is lacking in key details in order to provide meaningful public review and informed decision-making.

The proposed SCE Project covers roughly 12 miles of subtransmission lines, a new substation, pull and tension sites, and access roads. While Figure 2-2 is helpful to provide an overall view of the entire SCE Project², the description does not provide sufficient detail for evaluation of the separate components of the SCE Project. The narrative discussion related to the SCE Project components is impractical and nearly impossible to provide the reader with sufficient details in order to understand the enormity of the proposed SCE Project. The project description should include individual figures related to each SCE Project component, such as the Falcon Ridge Substation, connection points at the Etiwanda and Alder Substations, portions of the various subtransmission routes, the location of the seven miles of new access roads, and detailed figures illustrating the construction staging areas.

Additionally, Section 2.7 of the project description states that within the existing right-of-way, a 30-foot wide strip of land would be required for the development of the SCE Project as well as upwards of 13 acres of new right-of-way. Detailed figures must be provided to illustrate where this new right-of-way will be located. Further, the location within the existing right-of-way of the 30-foot easement is critical to illustrate the potential environmental impacts along the border of the right-of-way. For example, based upon separate discussions with SCE engineers, it appears that as designed, 6 to 17 conductors would be located within three feet of the eaves of the homes approved by way of the Specific Plan and vested by way of the Development Agreement. The lack of detail within the project description in the Draft EIR as it relates to the expanded easement and additional right-of-way is insufficient to allow for meaningful public review and informed decision-making, as required pursuant to CEQA.

C-3.7
cont.

C-3.8

C-3.9

² Figure 2-2, as well as other figures throughout the various impact categories, appears to illustrate an approximate 96 square mile area.

Without updating the project description with sufficient details and analysis, the description is insufficient as drafted and does not meet the standards set forth for a complete and stable project description in order to adequately and accurately evaluate the potential SCE Project impacts, proposed mitigation, and provided alternatives.

C-3.9
cont.

- Section 2.6.3 states “Figure 2-2, *Proposed Project* shows the locations of all new poles. Figure 2-5, *Subtransmission Structures*, depicts typical subtransmission pole configurations. Table 2-1, *Approximate Subtransmission Structure Dimensions*, shows approximate subtransmission structure dimensions.” Table 2-1 and Figure 2-5 only show typical elevations and pole dimensions, and Figure 2-2 shows the route, with no details regarding the various locations of the poles, specific dimensions, or potential impacts based upon the specifics of the subtransmission equipment.

The SCE Project details related to the proposed subtransmission line poles and equipment, including the conductors, wires, and supports, is entirely insufficient. Table 2-1 in the Draft EIR lists various pole styles with their approximate heights and Figure 2-5 shows elevations of the proposed poles. It does not provide any details as to where the various poles will be located within the SCE Project. While SCE may not be able to illustrate exactly where each pole will be at this time, SCE cannot merely claim that it is too speculative and therefore only provide a basic discussion in the project description. This is an essential component that is necessary in order to appropriately evaluate the aesthetic impacts within the Draft EIR.

C-3.10

This lack of detail violates both the State CEQA Guidelines and considerable case law requiring sufficient detail and specifics within the project description to adequately weigh and evaluate the environmental impacts of a project, meaningfully consider project-related mitigation measures, or evaluate project alternatives. See State CEQA Guidelines section 15151; *Dry Creek Citizens Coalition v County of Tulare* (1990) 70 Cal.App.4th 20, 26 [An adequate EIR must be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. It must include detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed SCE Project.]

- Table 2-4 illustrates the amount of cut/fill for the proposed substation. It appears that 5,000 cubic yards (cy) is anticipated to be imported with 2,000 cy to be exported. 7,000 cy translates to roughly 350 truck trips. Was this included in the truck trips as part of both the air quality and traffic analysis? Additionally, it is unclear from the analysis the volume of cut/fill that may be required for the access roads and transmission lines. Given that 7 miles and roughly 11 acres of new access roads alone are anticipated, this is likely to be a large number.

C-3.11

Environmental Baseline

While the typical environmental baseline related to project impacts is made up of the existing physical conditions at the time the EIR process begins, State CEQA Guidelines section 15125(d) also adds the, "EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans." Furthermore, "where a proposed project is compared with an adopted plan, the analysis shall examine the existing physical conditions at the time the notice of preparation is published...as well as the potential future conditions discussed in the [adopted] plan." *Id.* at 15125(e).

C-3.12

The Draft EIR should have included not only the existing physical conditions at the time of the notice of preparation, but in the discussion of the baseline, also the inconsistencies with the Specific Plan. Given that the Vested Summit at Rosena Project is legally vested, the Draft EIR must also include this as part of the baseline, likely in a two-tier approach, to illustrate the future impact on the Specific Plan. The SCE Project will run directly through the Vested Summit at Rosena Project and have considerable impacts on the Vested Summit at Rosena Project as it is currently proposed. However, there is no discussion of this significant matter in either the direct, indirect, or cumulative impact analysis.

Alternatives Analysis

- A core aspect of CEQA is to identify feasible project alternatives with the potential to reduce significant project impacts and provide sufficient information about each alternative to allow evaluation, analysis, and comparison to the proposed project. State CEQA Guidelines section 15126.6.

C-3.13

The evaluation of alternatives involves a two-step process. First, the lead agency must generate potential alternatives that meet the thresholds related to the ability to substantially reduce environmental impacts while attaining most of the project objectives, while also remaining both feasible and realistic. The second step then is to determine from that pool a reasonable range of project alternatives to carry forward in the analysis.

While there are no fixed rules regarding the number or type of activity that should be analyzed within the alternative section, in total, the alternatives screening process for this Draft EIR culminated in the identification and screening of only 14 potential alternatives. This is a very limited number of alternatives given the size of the proposed SCE Project. While the range of alternatives must be considered in light of the nature of the proposed project, including specific constraints unique to a project or other material facts (see *Mira Mar Mobile Community v City of Oceanside* (2004) 119

Mr. John Boccio
March 9, 2012
Page 8

Cal.App.4th 477)³, this does not mean that the applicant can choose either too narrow of a set of project objectives or craft narrowly defined alternatives in order to limit the number of feasible alternatives available to discuss in the EIR.

C-3.13
cont.

For example, under both Alternative 6: Overhead Summit Avenue Realigned Subtransmission Source Line Route and Alternative 7: Undergrounding Summit Avenue Realigned Subtransmission Source Line Route, the analysis appears to change the subtransmission course to traverse the B.F. Goodrich Superfund Site, with no discussion or clarification as to why a feasible alternative would be chosen and designed to cross a superfund site (aside from using such manufactured alternatives to squeeze the potential field of alternative candidates to one). Further, these two alternatives are found to cross higher fire hazard zones than the proposed SCE Project. Yet, the proposed SCE Project itself finds less than significant impacts related to such fire risks in high and very high fire danger zones.

C-3.14

Alternative design options that utilized undergrounding as an option were also narrowly defined in order to be easily disposed of in the first phase of the analysis. As discussed above, Alternative 7: Undergrounding Summit Avenue Realigned Subtransmission Source Line Route would have the undergrounding occur under a superfund site. The Alternative 9: Parallel to 500 kV Transmission Line (Underground) was designed to only underground under the 210 Freeway, thus, not surprisingly, becoming technically infeasible due to numerous existing facilities such as water mains, natural gas lines, and freeway on- and off-ramps.

C-3.15

The rationale for elimination of Alternative 14: Non-Wires Alternative – Upgrade Alder and Randall Substations is also insufficient. The analysis states that relocating existing new duct banks would result in similar impacts to air quality, noise, and traffic. However, it misses the key offsetting benefit in that it would eliminate over 12 miles of 300 new 35’ to 100’ tall subtransmission poles spread throughout three different cities, as well as the elimination of a new substation in the middle of existing and planned residential communities.

C-3.16

Lastly, the applicant essentially provides three “throw away” alternative options – namely phased construction, conservation, and distributed generation (Alternatives 2, 12, and 13). While clearly additional options for energy management and cleaner forms of energy are important aspects to a balanced energy policy, they do not appear to be able to take the place of the needs related to energy infrastructure. Additionally,

C-3.17

³ The court concluded two low-density and one high-density development alternative were sufficient given the constraints of the proposed project and the fact that only one significant environmental impact occurred; such a discussion did not preclude informed decision-making or public participation.

it is unclear from the rationale for elimination as to why pushing the construction phase from 12 months to 15 months would require modifications to existing facilities. It also states that it would pose practical and economic considerations. Using economic considerations to eliminate alternatives based on economic infeasibility requires substantial evidence to support such a statement. See *Kings County Farm Bureau v City of Hanford* (1990) 221 Cal.App.3d 692; *Center for Biological Diversity v County of San Bernardino* (2010) 185 Cal.App.4th 866.

C-3.17
cont.

As part of this analysis, the SCE Project must identify a reasonable range of alternatives, based upon a rule of reason, in order to provide the lead agency with a reasoned choice and designed to foster informed decision-making and public review. *Supra*; See *Citizens of Goleta Valley v Board of Supervisors* (1990) 52 Cal.3d 553 [“there is no ironclad rule governing the nature or scope of the alternatives to be discussed in an EIR, other than the rule of reason.”]; *City of Long Beach v Los Angeles Unified School District* (2009) 176 Cal.App.4th 889.

Given the importance of aesthetics as the most impactful long-term significant effect, there are too few alternatives that incorporate aspects of undergrounding, particularly around areas of residential developments. Where alternatives that did possess elements of undergrounding were proposed, the analysis screened those alternatives by focusing on construction air quality emissions (short-term) at the expense of aesthetics (long-term); discarding the entire undergrounding option since portions would be technically infeasible (thus using that as an excuse to negate the entire option); or altering the subtransmission line so it traverses a superfund site. Evidently, it appears that undergrounding options are only acceptable to SCE when it is required (such as the need to maintain required electrical clearances with the existing 500 kV transmission line).

C-3.18

The most basic alternative that would offset a number of impacts, including aesthetics, would be an alternative based on the proposed SCE Project’s existing footprint, with greater undergrounding where appropriate to avoid impacts to both existing and planned residential communities. This maintains all of the SCE Project’s objectives, while reducing the long-term impacts to the greatest extent feasible. Moreover, it allows SCE to implement aboveground features in more industrial areas and/or where undergrounding is not technologically reasonable.

The number of alternatives screened from review to only allow effectively one alternative is entirely insufficient to meet the requirements under CEQA to foster informed decision-making and public review and does not fulfill the requirements to permit a reasonable choice of alternatives for a suitable environmental impact evaluation. See State CEQA Guidelines section 15126.6; *San Bernardino Valley Audubon Society, Inc. v County of San Bernardino* (1984) 155 Cal.App.3d 738. Rejection of

Mr. John Boccio
March 9, 2012
Page 10

alternatives must be based on substantial evidence in the record and not merely upon self-serving statements in the Draft EIR. C-3.18
↑
cont.

Environmental Analysis

Aesthetics

• The proposed SCE Project includes upwards of 12 miles of transmission lines. Yet it appears that only eight key observation points (KOPs) were provided. How is it possible to effectively evaluate the potential environmental impacts that cross the Cities of Rialto, Rancho Cucamonga, and Fontana with over 12 miles of transmission lines and only provide a limited evaluation for aesthetics? Additionally, it appears that the analysis focuses exclusively on roadways for the KOPs. However, there are additional impacts beyond only motorists that will be subjected to these substantial visual impacts.

C-3.19

For example, looking at KOP 1, not only will motorists see the poles, but so will the homeowners located within Heritage Village. The same argument also pertains to the homes located along Sierra and Summit Avenue that will now see the poles as well as the new substation. This is an industrial addition to the view shed that requires suitable discussion in the analysis. The analysis is insufficient to illustrate the depth of this potential impact.

C-3.20

• The analysis only finds KOP 3 as a significant and unavoidable impact. The proposed SCE Project includes a new substation and upwards of 300 new power poles ranging from 35 feet to 100 feet in height, with voltage wires strewn along the poles. While aesthetics and visual impacts are subjective to some degree, the SCE Project creates a very industrial feel throughout numerous existing and proposed neighborhoods. This is a significant impact that the incorporation of mitigation measure 4.1-1 does not reduce to less than significant.

C-3.21

• The analysis relies upon Table 4.1-2 for justification as to the potential adverse impacts, which compares visual sensitivity to overall visual change. The analysis needs to clarify where these "guidelines" are derived.

C-3.22

• A fundamental purpose of an EIR is to identify ways in which a significant impact can be either avoided or mitigated. Pub. Res. Code section 21002.1. In order to implement this requirement under CEQA, the Draft EIR must describe all feasible mitigation measures that reduce the significant environmental impacts to less than significant, and should focus on measures that are both feasible and effective. State CEQA Guidelines sections 15121, 15126.4; *Environmental Council of Sacramento v City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039 ["If, as so many courts have said, the EIR is the heart of CEQA, then...mitigation is the teeth of the EIR. A gloomy forecast of

C-3.23

environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium. Thus, CEQA requires project proponents to mitigate all significant environmental impacts of their project...”]

Impact 4.1-1 states that with the incorporation of mitigation measure 4.1-1, impacts to a number of KOPs would be less than significant. This mitigation measure merely states that SCE will use subtransmission line conductors that are non-specular and non-reflective and insulators that are non-reflective and non-refractive. The analysis then concludes that impacts will be less than significant.

In order to rely upon mitigation measures to reduce the potential impact to less than significant, the measure must be actually designed to effectively minimize or reduce the impact. If it is not clear on its face as to why the measure would reduce the potential impact, then the Draft EIR needs to include sufficient detail to illustrate how and why the mitigation would act as it is purported to do so. See *Kings County Farm Bureau v City of Hanford* (1990) 221 Cal.App.3d 692; *San Franciscans for Reasonable Growth v City & County of San Francisco* (1984) 151 Cal.App.3d 61. In the Draft EIR, there is no detailed analysis to illustrate how or why this would reduce impacts caused by upwards of 100-foot power poles to less than significant. It is conclusory and insufficient analysis under CEQA.

C-3.23
cont.

- The analysis in reference to KOP 6 states that “although the Project would visibly increase the industrial character within the landscape, it would add to existing site characteristics” and “the Project would co-dominate the landscape with other industrial features...” The analysis is essentially using the argument that since industrial aspects already exist and impact the surrounding views (including the views of the San Bernardino Mountains) then the addition of more industrial elements is less than significant. In fact, the opposite is true; this is similar to a cumulative impact where the addition of 65 to 100 foot tall power poles and a new substation further impact the overall aesthetics in the area by creating an industrial feel.

C-3.24

- CEQA requires that an EIR propose mitigation measures that will minimize the project’s significant impacts by reducing or avoiding those impacts. This is a fundamental purpose of an EIR. Therefore, it is unclear as to why, even if only for portions of the proposed SCE Project, undergrounding of transmission lines was not included in either the analysis or as a mitigation measure. This would clearly help offset the most damaging, long-term significant SCE Project impacts. It appears to likely be the number one reason that SCE concluded that only KOP 3 was a significant visual impact, in order to argue that undergrounding portions of the SCE Project is not required.

C-3.25

Mr. John Boccio
March 9, 2012
Page 12

- As previously discussed, the Vested Summit at Rosena Project includes an approved Specific Plan and Development Agreement providing J.W. Mitchell with a vested right to construct single-family residences, recreational and activity centers, an elementary school, and parks consistent with the approved development plan.

A key aspect of the CEQA process is to identify and disclose to decision-makers and the public, the significant environmental impacts of a proposed project prior to its consideration and approval. State CEQA Guidelines section 15002(a)(1). As stated by one court, "the report [EIR] referred to in the sections may be viewed as an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *County of Inyo v Yorty* (1973) Cal.App.3d 795, 810.

C-3.26

Accordingly, the Draft EIR should have included in the aesthetics analysis a discussion of the potential visual impacts that will occur to the future residences at the Vested Summit at Rosena Project. While SCE may claim that the impact of the proposed SCE Project on future residences at this location is too speculative to be included in the Draft EIR, as discussed, J.W. Mitchell already has vested rights to develop their site and has expended considerable money in the pursuit of those approvals and in reliance upon those approvals. To allow SCE to avoid the evaluation of the significant aesthetic impacts that will occur at the Vested Summit at Rosena Project would thwart the CEQA cornerstone of meaningful public review and informed decision-making.

- Impact 4.1-6 states that nighttime construction may be required and would include lighting impacts at that time. However, it also states that lights "would be oriented to minimize their effect on any nearby receptors." This lacks detail and evaluation for this potential impact. Given that mitigation is included under the noise analysis as well for nighttime construction impacts, it appears more likely than not that SCE intends to perform at least some of the construction during nighttime operations. Additional detail, such as a photometric plan, is needed to evaluate this potentially significant impact. In addition, it is unclear if the towers would require any nighttime lighting as part of the FAA compliance.

C-3.27

C-3.28

Agriculture and Forestry Resources

- The Draft EIR states that according to CPUC General Order No. 131-D, local land use regulations would not apply to the SCE Project and alternatives. General Order No. 131-D states that public utilities are not required to obtain local discretionary permits. The General Order does state that in locating such projects, the public utilities must consult with local agencies regarding land use matters. It is silent as to the use of the local ordinances and land use regulations regarding impact determinations pursuant to CEQA. The key goals of CEQA are to mitigate potentially

C-3.29

Mr. John Boccio
March 9, 2012
Page 13

significant impacts through mitigation and/or alternatives and to inform decision-makers as to potential impacts related to projects. "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." Pub. Res. Code section 21002.1. Therefore, even if SCE is not required to obtain discretionary permits, local regulations need to be discussed in detail to inform both the public and the CPUC as lead agency of any potential impacts that may result from the SCE Project.

C-3.29
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SCE appears to include discussions in the analysis when it can be used to reduce impacts; yet ignore local regulations when it does not. For example, the analysis utilized the zoning designations under the City of Fontana Municipal Code as well as the reliance on the City's General Plan Update EIR to illustrate a less than significant impact to unique farmland – without discussing the merits of the land for future farming purposes. This represents an insufficient analysis related to this potentially significant impact.

As stated in the Draft EIR, portions of the unique farmland currently contain abandoned grape vineyards surrounded by urban development that "are not actively farmed and are likely only present due to the heavy rain season of 2009-2010." Essentially these are vineyards that are continuing to grow in this arid climate with no active farming or water sources beyond rain. This appears to be potentially important land for continued agricultural purposes. In fact, an active winery surrounded by urban development would not be an unreasonable use for the site.

C-3.30

The analysis does not appear to address when the area was last farmed, the types of soil present, or if any agricultural modeling⁴ was performed. The analysis must assess the potential of the unique farmland for future agricultural purposes as well as potential impacts for future uses related to farming that may occur.

Air Quality

- The Draft EIR uses the localized significance thresholds (LSTs) for its assessment of localized impacts to sensitive receptors. Typically, sites of five acres or less may use the LSTs, which are mass rate look-up emission tables, as opposed to conducting modeling analysis to determine if a project would create significant localized air quality impacts. The LST emission tables were developed for 1-acre, 2-acre, and 5-acre sites such that the emission levels were developed from modeling analyses designed to comply with the ambient air quality thresholds for various locations ranging from 25 - 500 meters.

C-3.31

⁴ Such as the California Agricultural Land Evaluation and Site Assessment Model (LESA).

Mr. John Boccio
 March 9, 2012
 Page 14

It is unclear as to why the Draft EIR uses the mass emissions rate look-up tables for the proposed SCE Project as opposed to dispersion modeling for localized risk assessments. Clearly, given the volume of trucks anticipated and the size of the SCE Project, utilizing a 1- or 2-acre LST look up table is not going to provide an appropriate assessment of the potential for construction related emissions impacts in the surrounding neighborhood.

C-3.31
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There are ten existing schools, preschools, or daycare centers within 0.25 miles of the SCE Project and one of the schools is located 0.2 miles from the proposed substation. Moreover, as identified under footnote c on Table 4.3-8, there are sensitive receptors up to nine meters from the SCE Project site. As stated, the LST look up tables could not assess the potential impacts for anything less than 25 meters⁵. Therefore, without appropriate dispersion modeling, the less than significant impact conclusions are not adequately supported by the analysis.

C-3.32

It is also unclear as to why the Draft EIR breaks down each construction component separately for the localized emissions evaluation. While this approach was used for the regional evaluation, this was acceptable since the analysis then used the total values provided. That does not mean that the proposed SCE Project can then separate the components as operating as individual multiple 1- and 2-acre sized projects. The individual size for the substation alone is over 7 acres; and the entire SCE Project includes over 160 acres of disturbed land.

C-3.33

Given the duration of the construction period, the volume of earth moving anticipated, the close proximity to residences and schools, and the overall size of the SCE Project, the analysis related to potential impacts to sensitive receptors is insufficient and needs to be updated and submitted for appropriate public review.

Biological Resources

- It is unclear under Impact 4.4-1 if the species of Plummer's mariposa lily and Parry's spineflower will be removed or not. 116 individual species were found on the proposed SCE Project site and it appears that of those species, all 47 of the Parry's spineflower and 22 of the Plummer's mariposa lily would be impacted. The analysis does not appear to adequately address the potential loss of the species.

C-3.34

⁵ As stated under Table 4.3-8, "it is impossible to estimate an LST level for 9 meters using linear interpolation. Therefore, LST levels at 25 meters were used for the maximum allowable emissions for these construction activities."

Mr. John Boccio
March 9, 2012
Page 15

For example, the bottom of page 4.4-32 states that “through the implementation of APM-BIO-02, SCE would avoid and minimize impacts, restore and compensate for project-related losses to sage scrub habitat types, and monitor restoration, where Plummer’s mariposa lily and Parry’s spineflower may be encountered.” The analysis already shows these two species are located onsite and will be impacted to an undefined degree. While Mitigation Measure 4.4-1 focuses more on Riversidean sage scrub, it does include under the first bullet-point that the species will be avoided and to minimize impacts to special-status plant species to the “maximum extent feasible.” However, this does not adequately address the potential impact to these species nor does it appear to adequately mitigate for the potential loss of the 69 species. This would result in a significant impact under CEQA.

As stated previously, if it is not clear on its face as to why the measure would reduce the potential impact, then the Draft EIR needs to include sufficient detail to illustrate how and why the mitigation would act as it is purported to do so. See *Kings County Farm Bureau v City of Hanford* (1990) 221 Cal.App.3d 692; *San Franciscans for Reasonable Growth v City & County of San Francisco* (1984) 151 Cal.App.3d 61. Further, mitigation measure cannot be too remote or too speculative. *Federation of Hillside & Canyon Associations v City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1262 [finding that mitigation measures provided that were not fully enforceable were not suitable to meet the standards of CEQA].

Therefore, providing mitigation that only will offset potential impacts “to the maximum extent feasible” does not provide a clear indication as to how – or IF – the proposed mitigation would reduce the potential impacts to less than significant.

• Impact 4.4-2 lists numerous species that either have a high potential to be located onsite due to suitable habitat or were actually observed onsite. While focused surveys were completed for 3 species, focused surveys do not appear to have been completed for 12 other species. SCE relies upon APM-BIO-01 that include preconstruction surveys for loggerhead shrike, burrowing owl, grasshopper sparrow, and “other birds” as a way to offset any impacts to those special-status wildlife species. However, that only applies to construction during the nesting season. Given the high probability that some of these species are present, impacts to those species are likely if construction occurs outside of the nesting period. The analysis within the Draft EIR is insufficient to either discuss the overall impacts to these species, the species’ loss of habitat, and does not adequately illustrate how the impacts to those species would be mitigated to less than significant.

The impact also relies upon APM-BIO-2 related to the avoidance and/or restoration of sage scrub habitat in order to offset impacts to the northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern

C-3.34
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C-3.35

C-3.36

Mr. John Boccio
March 9, 2012
Page 16

grasshopper mouse, and Los Angeles pocket mouse. Again, the avoidance and restoration of damaged sage scrub habitat does not appear to either assess the overall impact to these species or how to mitigate for the loss of those species to a less than significant level of impact. The Draft EIR does include Mitigation Measure 4.4-2 which states that Los Angeles pocket mouse habitat will be avoided “to the maximum extent feasible” and that “SCE shall define Los Angeles pocket mouse habitat as ‘off limits’ in construction plans and specifications.” However, this fails to assess the potential impacts to Los Angeles pocket mouse. Lastly, the impact entirely ignores the remaining non-listed special-status species, which includes the coast horned lizard, coast patch-nosed snake, American badger, and special-status bats.

C-3.36
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- Mitigation Measure 4.4-4 requires SCE to follow Avian Power Line Committee guidelines for avian protection to powerlines in order to reduce mortality from powerline interaction. However, the analysis is insufficient to illustrate how the compliance with this mitigation measure will reduce the impacts to raptors to a less than significant level of impact. The impact fails to discuss the potential for collision and electrocution for species beyond raptors, including impacts to special-status bats that may be located in the area.

C-3.37

- There does not appear to be any discussion related to the potential for noise impacts on nesting birds. Typically, 60 dBA will interfere with birds during breeding season. The proposed SCE Project needs to control for this potential impact for any construction during the breeding season.

C-3.38

Cultural Resources

- Impact 4.5-1 provides insufficient analysis and details regarding the potential impact to cultural resources. The analysis states that two resources that were located would be spanned by the transmission line and therefore would not be impacted. There does not appear to be sufficient analysis to illustrate how construction of the access roads or pole placement would avoid these two cultural resource sites.

C-3.39

Other sites that would be impacted were determined to lack integrity and therefore are not eligible for listing on either the national, state, or local register. Regardless, despite the number of cultural resources located within the SCE Project area, the only mitigation provided is to cease work if any inadvertent resources are located during construction.

C-3.40

Mitigation Measure 4.5-1 is not clear as to who would make the determination to stop work and create a 100-foot buffer until an archaeologist can actually assess the resource. At the least, the mitigation needs to include onsite and qualified archaeologists during construction activities for the entire site. If not, then the likely

Mr. John Boccio
March 9, 2012
Page 17

outcome is the destruction of such resources by unqualified SCE staff and contractors, despite the inclusion of Worker Environmental Awareness Training for staff⁶. C-3.40
| cont.

Geology and Soils

• Impact 4.7-1 states a geotechnical report was completed for the proposed Falcon Ridge Substation but that "SCE has not yet prepared a geotechnical investigation of the subtransmission source line route, associated facilities, or telecommunications system." The proposed SCE Project elements are known, including the proposed subtransmission route. The proposed SCE Project includes over 300 poles, ranging in heights of 35 to 100 feet, with electrical wiring, running aside existing and proposed residential communities.

C-3.41

An updated geotechnical investigation for the entire SCE Project needs to be completed and the appropriate analysis incorporated into the Draft EIR in order to evaluate the potential impacts related to seismic ground shaking, liquefaction, lateral spreading, etc. Without such detail, the Draft EIR's finding that impacts are less than significant is conclusory and fails to provide the required level of review in order to foster effective public review and informed decision-making.

Greenhouse Gas Emissions

• The Greenhouse Gas Emissions analysis lacks sufficient detail to address the overall impacts to the region. While the SCE Project itself does not appear to create a substantial volume of CO₂e per year, despite SCE characterization of the nature of the SCE Project as reactionary to existing electrical needs, the SCE Project will upgrade the electrical grid and add additional capacity to the system in the overall project area. This in turn will help further induce growth. While it may prove speculative to attempt to quantify any of those values, even a qualitative discussion needs to be included in the analysis.

C-3.42

Hazards and Hazardous Materials

• The analysis under Impact 4.9-2 states that subsurface utilities or structures may be encountered and damaged during construction and screening activities for such structures prior to commencement of the SCE Project would reduce such impacts to less than significant. Why has screening for subsurface utilities and structures not been done already? What about the potential to encounter underground storage tanks (USTs) or leaking underground storage tanks (LUSTs) during the construction

C-3.43

⁶ See Section 2.8.3 Worker Environmental Awareness Training in the project description.

Mr. John Boccio
March 9, 2012
Page 18

process? This should be included in the analysis in order to appropriately illustrate the potential hazardous impacts during the construction process. C-3.43
cont.

- According to the analysis under Impact 4.9-6, Mitigation Measure 4.9-6 will require a Fire Prevention and Emergency Response Plan in order to offset impacts related to construction and operations located within a high and very high fire area. The analysis is insufficient to illustrate how the plan will actually ensure the impact is less than significant. Given the nature of the proposed SCE Project and the potential for ignition in a very high fire hazard zone during both the construction process and continuing operations, it seems that no mitigation could offset this potential impact to less than significant. The significance conclusion should be changed to significant and unavoidable with appropriate analysis addressing this substantial impact. C-3.44
- The area is designated as a high and very high fire hazard zone. However, the analysis lacks any discussion regarding the addition of 100 foot poles with electrical lines as a hazard to air sources for fire suppression. This is a potentially significant impact unique to the proposed SCE Project that needs to be included in the analysis.

Hydrology and Water Quality

- The project description states that upwards of seven miles of access roads will need to be constructed as part of the proposed SCE Project; yet Impact 4.9-2 does not include any discussion related to the potential erosion impacts due to the access roads and appears to only focus on the substation location. Unimproved access roads will act as new pathways for runoff where previously none existed. The analysis needs to include a thorough discussion related to the access roads and how the roads will be designed to reduce runoff and resulting erosion impacts.
- The analysis states under Impact 4.9-2 that the SCE Project would achieve post-development runoff rates, volumes, flow velocities, and flow durations to mimic pre-developed conditions. However, the analysis does not provide what those pre- and post-developed rates are; how the SCE Project as proposed will actually meet those rates; and how this relates to the new seven miles of access roads to be built as part of the proposed SCE Project. It is inadequate to simply state that the SCE Project will accomplish this goal, merely affirming that the project will incorporate best management practices (BMPs) as part of the National Pollutant Discharge Elimination System NDES process. C-3.45

Land Use and Planning

- General Order No. 131-D states that public utilities are not required to obtain local discretionary permits. The General Order does state that in locating such projects, the public utilities must consult with local agencies regarding land use matters. They C-3.46

Mr. John Boccio

March 9, 2012

Page 19

General Order is silent, however, as to the use of the local ordinances and land use regulations regarding impact determinations pursuant to CEQA. “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” Pub. Res. Code section 21002.1. This is a cornerstone of an EIR and the CEQA process. Therefore, while SCE may not need to obtain local discretionary permits, they still are required to evaluate plan inconsistencies and local regulations within the environmental impact analysis under CEQA.

C-3.46
cont.

The EIR preparers cannot simply ignore the potential for impacts related to land use and planning consistency by claiming that SCE does not have to obtain discretionary permits from the various local agencies. As such, the discussion related to potential impacts and inconsistencies with the Specific Plan is entirely missing from the analysis. The Draft EIR does not illustrate the inconsistencies related to the Specific Plan’s Planning Area 7, 8, and 9; nor does it evaluate the displacement of vested housing rights and changes to required setbacks within the adopted Specific Plan.

Noise

- The analysis for noise chose 6 locations for ambient noise. This is exceedingly limited given that the proposed SCE Project traverses upwards of 12 miles and equates to greater than 160 acres of impacted land as part of the construction process.

C-3.47

- Again, SCE states that according to CPUC General Order No. 131-D, local land use regulations would not apply to the SCE Project. However, the EIR preparer uses the local land use regulations to SCE’s inappropriate advantage, claiming they do not need to evaluate the potential construction related noise impacts since the SCE Project would comply with the exceptions for construction projects found within the City of Rialto and Fontana municipal codes. This does not allow for informed decision-making or meaningful public review and does not address the actual noise impacts that will occur throughout the SCE Project site.

C-3.48

- There does not appear to be any evaluation in respect to an increase in ambient levels of noise due to the transformers or corona noise under Impact 4.13-2. This needs to be included as part of the analysis.

C-3.49

- Impact 4.13-5 states that there are no applicable local policies or standards to judge the significance of short-term construction noise levels in the County of San Bernardino, and the cities of Fontana or Rialto. Therefore, the analysis discusses a daytime noise level of 90 dB at the nearest residences. The residential standard of 65 dB is the common value for sensitive receptors. Using a value of 90 dB is inappropriate in order to evaluate the potential impacts related to construction.

C-3.50

Mr. John Boccio

March 9, 2012

Page 20

• Mitigation Measure 4.13-5 discusses mitigation for the use of nighttime construction that may potentially occur. However, the analysis also states that the SCE Project will comply with the required hours and days for construction operations unless a variance is obtained for nighttime operations – despite the statement that no discretionary permits are required to be obtained by SCE. Any nighttime construction despite mitigation would likely be significant unless it can be shown that impacts would remain below the typical 45 dB residential nighttime standards. Therefore, the conclusion that with mitigation, Impact 4.13-5 will be less than significant is conclusory and lacks support within the Draft EIR.

C-3.51

Public Services

• Under the discussion related to fire protection, given the high and very high fire hazard zone designations, greater analysis is required related to existing fire protection in the area. The analysis must include sufficient detail to illustrate that acceptable service ratios exist to the various project components in order to assess the potential impact. Without such analysis, the no impact finding is unsupported.

C-3.52

Recreation

• The analysis states that with the incorporation of Mitigation Measure 4.16-1, impacts related to pedestrian pathways and park closures will be less than significant. However, there is no analysis or support to illustrate why simply informing of such impacts would reduce the impact to less than significant.

C-3.53

Transportation and Traffic

• The traffic impact analysis needs to include greater detail regarding the potential impacts to local roadways. Table 2-6 provides a detailed breakdown related to construction processes. The substation location and subtransmission route is already known and a detailed discussion related to potential lane closures or reduced capacity needs to be included in the analysis.

C-3.54

• The section relies on Mitigation Measure 4.17-1 to reduce construction related impacts to less than significant. The reliance on scheduling truck trips outside the peak morning and evening commute hours is relied upon to ensure impacts to local roadways is less than significant. However, it also states this shall be accomplished “to the extent possible.”

C-3.55

As stated previously, if it is not clear on its face as to why the measure would reduce the potential impact, then the Draft EIR needs to include sufficient detail to illustrate how and why the mitigation would act as it is purported to do so. See *Kings County Farm Bureau v City of Hanford* (1990) 221 Cal.App.3d 692; *San Franciscans for Reasonable*

Mr. John Boccio
March 9, 2012
Page 21

Growth v City & County of San Francisco (1984) 151 Cal.App.3d 61. Further, mitigation measure cannot be too remote or too speculative. *Federation of Hillside & Canyon Associations v City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1262 [finding that mitigation measures provided that were not fully enforceable were not suitable to meet the standards of CEQA].

C-3.55
cont.

How is this binding mitigation to ensure impacts remain less than significant and who will be charged with ensuring proper scheduling occurs? This is insufficient mitigation to illustrate that a less than significant impact would occur and cannot be relied upon to illustrate a less than significant impact on traffic during peak hours.

- As stated previously, it is unclear as to the volume of cut and fill that will be required for the seven miles of access roads that will be built. However, roughly 350 truck trips would likely be required for the substation alone. This must be clarified within the analysis to illustrate the extent of cut and fill that may be required. Note it is unacceptable to merely state that the cut and fill will be balanced onsite.

C-3.56

Utilities and Service Systems

- Impact 4.18-2 (as well as project description under section 2.9.15) must include sufficient detail related to the volume of water use during construction. The discussion only states that the amount of water for construction activities would be minimal. This is an insufficient analysis of this potential impact. How much of the 160 acres would need to be watered during the construction period? While clearly this entire area will not be exposed by construction activity at the same time, the analysis is nonetheless lacking in any detail. Water loss due to construction, including daily watering for exposed areas, in this dry and arid climate is an important detail missing from the Draft EIR's analysis.

C-3.57

Cumulative Effects Analysis

- An EIR must discuss a cumulative impact if the project's incremental effect could combine with other projects in the impacted area in order to create a cumulatively considerable environmental impact. State CEQA Guidelines section 15130. A cumulative impact is defined as two or more individual impacts which are either considerable when combined together or impacts which operate to compound or increase other environmental impacts. State CEQA Guidelines section 15355.

C-3.58

As part of the cumulative impact analysis, the lead agency should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation utilized. State CEQA Guidelines section 15130. For example, impacts related to geologic hazards and/or cultural resources may be more confined as opposed to traffic and air quality impacts.

Mr. John Boccio
March 9, 2012
Page 22

It is unclear as to what limits and controls were used during the process to create the range of cumulative projects list. It is surprising that only 22 projects were identified within the range of the proposed SCE Project that traverses three cities and over 12 miles in length. The analysis must include additional detail to support the use of the summary of projections approach and the limited number of projects in that large of an area. It also does not appear that the approach looked at other cities in the area, including the City of Ontario which borders part of the SCE Project.

C-3.58
cont.

- The cumulative impact analysis identifies the Specific Plan as a cumulative project. Given that the SCE Project will run directly through the Specific Plan, the cumulative impact analysis must also discuss the impacts of the SCE Project on the Vested Summit at Rosena Project.

C-3.59

- The cumulative impact analysis must discuss cumulative impacts if the project will provide a “cumulatively considerable” contribution to a significant cumulative effect. State CEQA Guidelines section 15130. Cumulatively considerable is defined as when the “incremental effects of an individual project are significant when viewed in connection with the effects of past projects...current projects... [and] probable future projects.” State CEQA Guidelines section 15065.

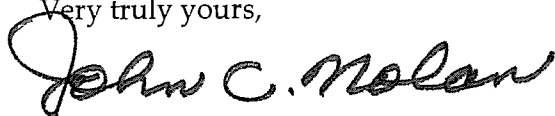
C-3.60

The proposed SCE Project will have significant aesthetic impacts throughout the Specific Plan area. However, the cumulative impact analysis only focuses primarily on impacts to motorists (as opposed to existing residences in the area). There is no explanation in the analysis to justify this limited impact evaluation. The cumulative impact discussion is insufficient

In conclusion, we want to thank you for your consideration of the provided comments. We feel there are a number of substantial errors and missing analysis from the Draft EIR that we believe must be corrected. We urge the applicant to address these issues in sufficient detail and provide enforceable mitigation where appropriate.

C-3.61

Very truly yours,



John C. Nolan, for
GRESHAM SAVAGE
NOLAN & TILDEN,
A Professional Corporation

JCN:ld

2.6.11 Letter C-3 – Responses to Comments from Gresham Savage

C-3.1 The Summit at Rosena Project was considered in the Draft EIR. See, for example, page 4.11-4 of Draft EIR Section 4.11, *Land Use and Planning*, which discloses that the “Etiwanda Subtransmission Source Line would... traverse [cross] areas covered by the Citrus Heights North, Summit at Rosena..., and West Gate specific plans,” each of which is an approved master-planned community. See also, the City of Fontana’s summary of the Summit at Rosena Project, which is cited among the references for Section 4.11, relied on in the Draft EIR, and provided in the Administrative Record for this Project. Consistent with the comment, the City’s summary says: “The Summit at Rosena is bisected by an Southern California Edison (SCE) right-of-way, which runs in an east / west direction through the project site.” Existing entitlements for the Summit at Rosena Project are noted.

The comment correctly states that SCE is proposing to widen its existing ROW in the vicinity of the Summit at Rosena Project. The proposed widening of the ROW described on page 2-16 of the Draft EIR is clarified in Response A-1.45.

The Draft EIR analyzed impacts to Land Use and Planning of the Project and alternatives in Section 4.11 (p. 4.11-10 et seq.) and, in the cumulative context, in Section 6.2.11 (p. 6-16). Based on CEQA Guidelines sections 15064 and 15126, and CEQA Guidelines Appendix G, the Project would have a significant land use impact if it would:

a) Physically divide an established community; b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project... *adopted for the purpose of avoiding or mitigating an environmental effect*; or c) Conflict with any applicable habitat conservation plan or natural community conservation plan (see Draft EIR Section 4.11.2, p. 4.11-10).

Neither the Summit at Rosena Specific Plan nor the Development Agreement for the project was adopted for the purpose of avoiding or mitigating an environmental effect. As stated in Section 1.1 of the Specific Plan: “The purpose of the Summit at Rosena Specific Plan is to focus development of the approximately 180-acre community in a manner that benefits community residents, the general public, and the City of Fontana. The Specific Plan achieves this goal by ensuring quality development, including a strong package of community amenities. The development regulations contained in the Specific Plan address the unique characteristics of the site and surrounding properties, as well as the needs of future residents of the community and City. The Specific Plan is intended to foster a more innovative and desirable community than could be achieved through conventional zoning and development standards.”²³ As indicated in California Government Code section 65864, the purposes of entering into a development agreement include providing regulatory assurances to applicants, and thereby, strengthening the

²³ City of Fontana, 2010. The Summit at Rosena Specific Plan (rev. April 2010).

public planning process, encouraging private participation in comprehensive planning, and reducing the economic costs of development; and removing the lack of public facilities and utilities as an impediment to residential and other development.

Consequently, neither the Summit at Rosena Specific Plan nor the Development Agreement for the project is an “applicable land use plan, policy or regulation” for purposes of Land Use and Planning significance criterion b).

To clarify this, the fifth sentence of the analysis of potential impacts related to significance criterion (b) on page 4.11-11 of the Draft EIR is revised as follows:

The Project would not conflict with any applicable agency land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect.

Whether the Project would affect the design of the Summit at Rosena Project is beyond the scope of CEQA’s inquiry.

C-3.2 The Subdivision Map Act (Gov’t Code §66410 et seq.) governs the implementation of the subdivision process by California cities and counties. The primary goals of the Map Act are to: encourage orderly community development, insure that the areas within the subdivision that are dedicated for public purposes will not become an undue burden on the community, and protect members of the public from fraud and exploitation (61 Ops.Cal.Atty.Gen. 299 (1978)). The comment states that a tentative map has been approved for the Summit at Rosena project; however, there is no evidence that the tentative map was adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the tentative map is not an “applicable land use plan, policy or regulation” for purposes of Land Use and Planning significance criterion b).

Regarding economic and valuation concerns, see Draft EIR Appendix A, *Scoping Report*, on page A-22, which states: “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.

C-3.3 Comments received during the scoping period are summarized in Appendix A, *Scoping Report*, and have been addressed in the appropriate Draft EIR sections.

C-3.4 As described in Draft EIR Appendix A, *Scoping Report*, page A-22, “The EIR... will not consider comments that pertain to SCE’s determination of project need. The CEQA process does not require the EIR to assess Project need as established by the project applicant. In addition, CPUC General Order 131-D establishes a distinction in the review levels a project receives based on the voltage level proposed. The Project does not meet

the threshold of 200 kV to qualify for a project needs assessment. Furthermore, SCE submitted an application for a PTC, which does not require an electrical needs assessment.” Issues related to determining project need are outside the scope of the EIR.

As explained in footnote 1 in the Executive Summary of the Draft EIR (p. ES-2), CEQA Guidelines section 15126.6 requires an EIR to describe a range of reasonable alternatives to the project, or its location, that feasibly would attain most of the basic objectives of the project even if these alternatives would impede to some degree the attainment of the project objectives as stated by the Applicant. So, to clarify, the CPUC relied on the basic objectives of the project to establish a reasonable range of alternatives, not to “restrict[]” what alternatives would be considered.

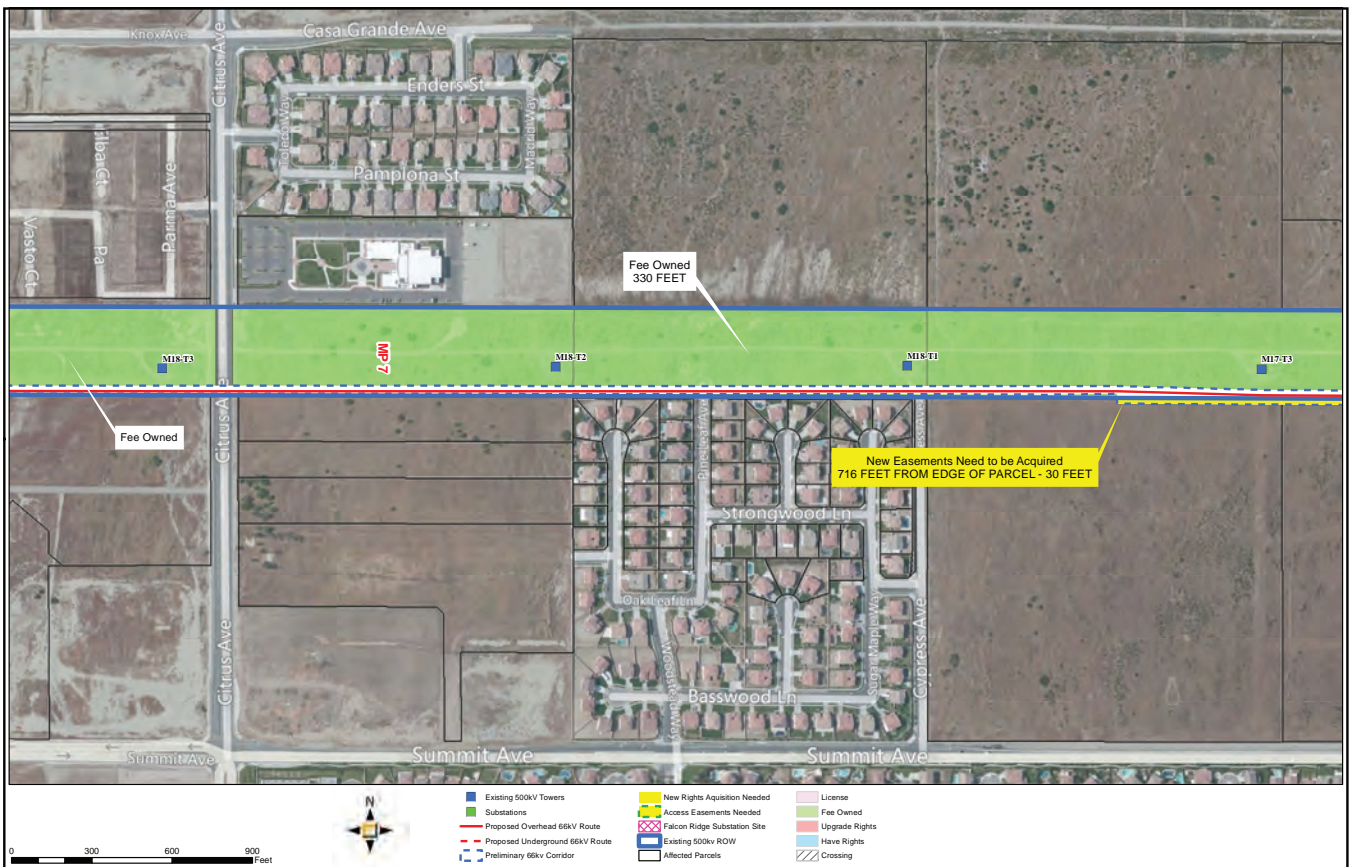
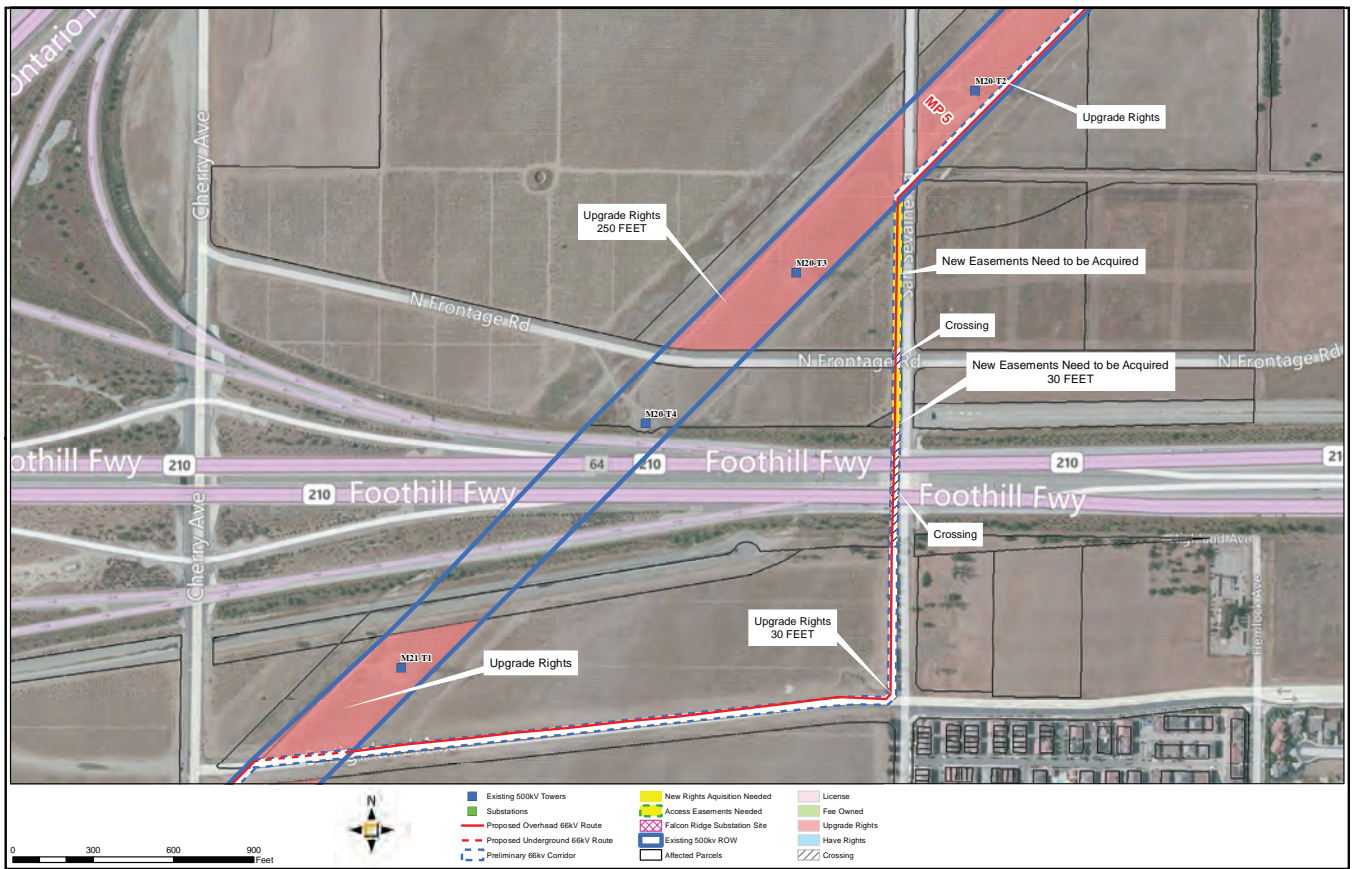
- C-3.5 As described in Draft EIR Appendix A, *Scoping Report*, page A-22, “The EIR will not consider electric and magnetic fields (EMF) in the context of the CEQA analysis of potential environmental impacts because [1] there is no agreement among scientists that EMF creates a potential health risk, and [2] there are no defined or adopted CEQA standards for defining health risk from EMF. 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 EMF from power lines up to approximately 4 percent of the total project cost.”

The Draft EIR does not conclude that the Project would not have a potential impact related to EMF, but 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. Although the Draft EIR does not provide significance determinations related to EMF, as described on page 1-7, information is presented for the benefit of the public and decision makers, and the EIR discloses that the International Agency for Research on Cancer and the California Department of Health Services (now California Department of Public Health) have classified EMF as a possible carcinogen. In the absence of defined or adopted standards for defining health risk from EMF, the CPUC does not make significance conclusions related to EMF exposure in its environmental documents. However, Draft EIR Appendix B, *SCE’s EMF Field Management Plan*, both quantitatively estimates EMFs that would be generated by the Project and describes the measures SCE would implement, in compliance with CPUC requirements, to reduce EMFs from this Project. Please note that the Appendix B calculations of EMFs are cumulative estimates that incorporate the EMFs from the existing Lugo-Mira Loma No. 2 and No. 3 500 kV lines that share the ROW with much of the proposed Etiwanda Subtransmission Source Line Route.

The California Department of Education fact sheet quoted in the comment pertains to the standards for the selection of new school sites, not the selection of power line easements. Furthermore, this excerpt notes that the required setbacks are based on the distance at which EMFs fall to near-background levels, not on specific evidence of risk. Similarly, in

- the absence of specific evidence of risk, the EIR does not make conclusions about EMF exposure, but does provide quantitative discussion of Project-related EMFs for consideration by the public and decision makers. See also Response B-7.3, provided in connection with comments received from the Fontana Unified School District. As noted therein, the Project would be located beyond Title 5's requirements regarding the proximity of new schools to 500-550 kV power line easements.
- C-3.6 As stated in Draft EIR Appendix A, *Scoping Report*, on page A-22, "The EIR will not consider comments related to whether or not SCE has the proper easements or ROWs for construction, operation, or maintenance of the Project. Negotiations of ROWs or easements occur between SCE and affected property owner(s) and generally do not require discretionary approval from a State or local agency. Consequently, such agreements would be outside the scope of CEQA. Any physical impacts that would occur within newly-acquired ROW as part of the Project would be assessed in the EIR."
- C-3.7 Comment states that Draft EIR Chapter 2, *Project Description*, does not contain adequate detail about individual Project components; however, it does not describe what additional specific information should be included or what aspects of the environmental analysis, if any, are believed to be based on insufficient information. Draft EIR Figures 2-3 (p. 2-6) and 2-4 (p. 2-9) depict the layout and access points for the proposed Falcon Ridge Substation, and Figures 4.1-3 (p. 4.1-17) and 4.1-4 (p. 4.1-18) depict visual simulations of the proposed Falcon Ridge Substation from KOPs 7 and 6, respectively. The locations of the proposed new access roads are shown in Figure 2-2 (Draft EIR, p. 2-5). The potential staging area locations are shown in Figure 2-6 (Draft EIR, p. 2-23). At this time, these locations are not finalized; however, the environmental impacts that could occur at these potential locations are analyzed throughout the document, and location-specific impacts (such as air quality emissions and traffic effects) are conservatively estimated based on locations further from Project work sites. Because the subtransmission source line and fiber-optic cable connections to the Etiwanda and Alder substations would use existing structures at those substations, these connections are not depicted in detailed figures.
- C-3.8 This comment is addressed in Response A-1.45.
- C-3.9 The 30-foot-wide strip of land *within* the existing ROW described in Section 2.7 would be located within SCE's existing ROW, but the exact locations of subtransmission source line components within the ROW is not yet known and would be determined after preconstruction surveys are completed. This EIR analyzes potential environmental impacts associated with development within the ROW corridor.

Additionally, Section 2.7 describes a new 30-foot-wide easement *outside* the existing ROW that SCE proposes to acquire. This easement would be located adjacent to the southern border of the existing ROW. This segment begins approximately 716 feet east of Cypress Avenue and extends east approximately 1,944 feet to Sierra Avenue and continues east and northeast approximately 703 feet to the proposed substation location. See Final EIR Figures 2-3a, 2-3b, and 2-3c, which clarify the location of the 30-foot-wide

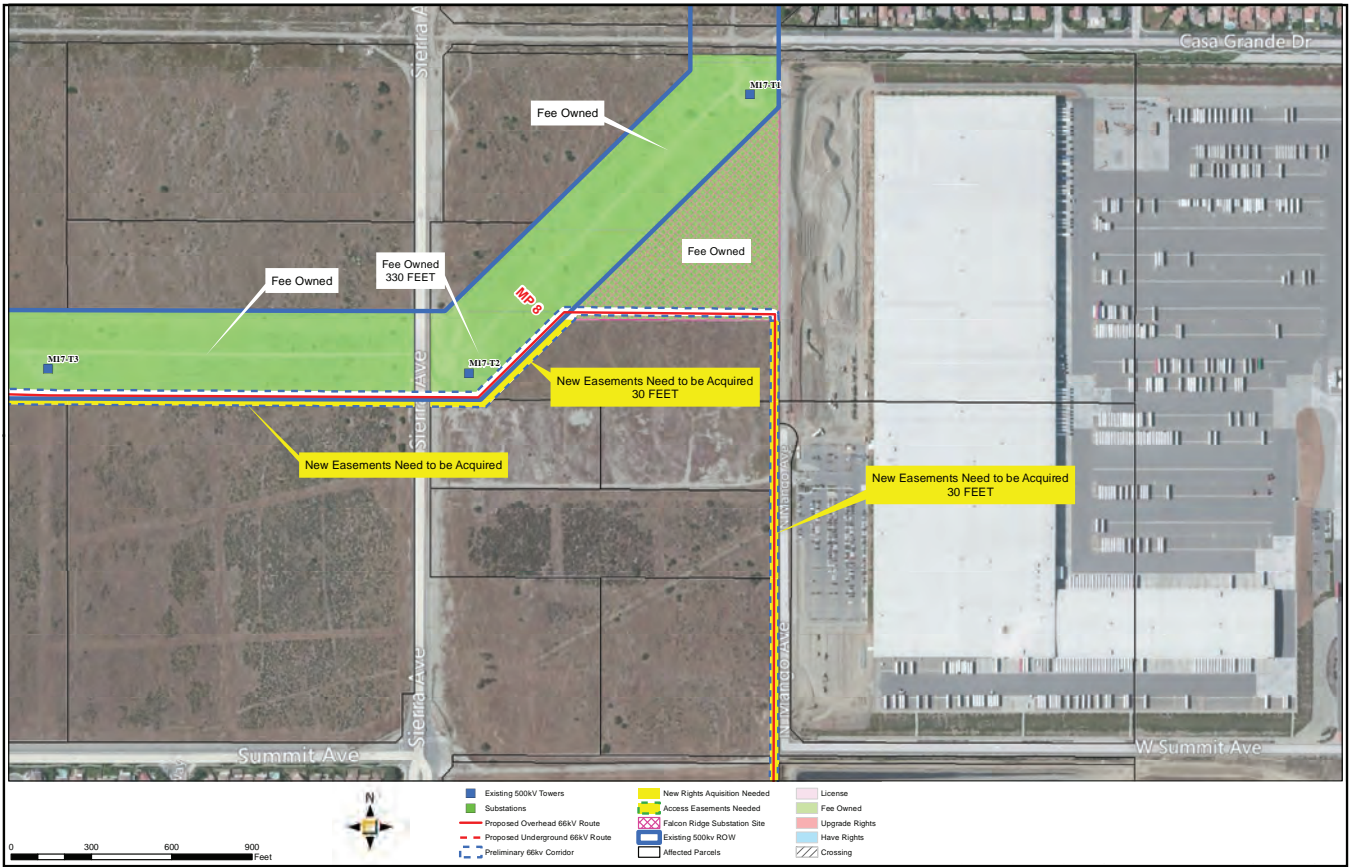


SOURCE: SCE, 2012

Falcon Ridge Substation Project . 207584.09

Final EIR Figure 2-3a

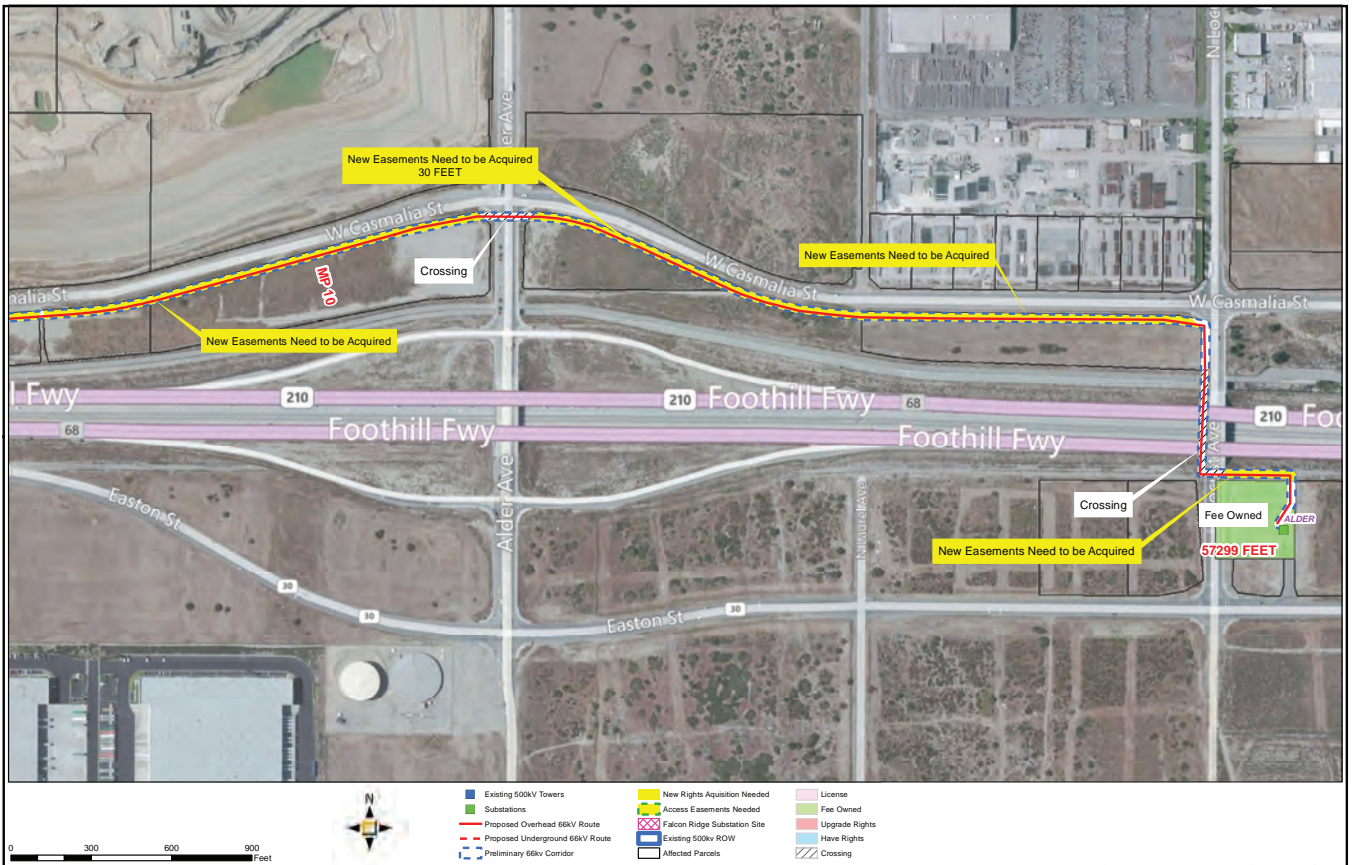
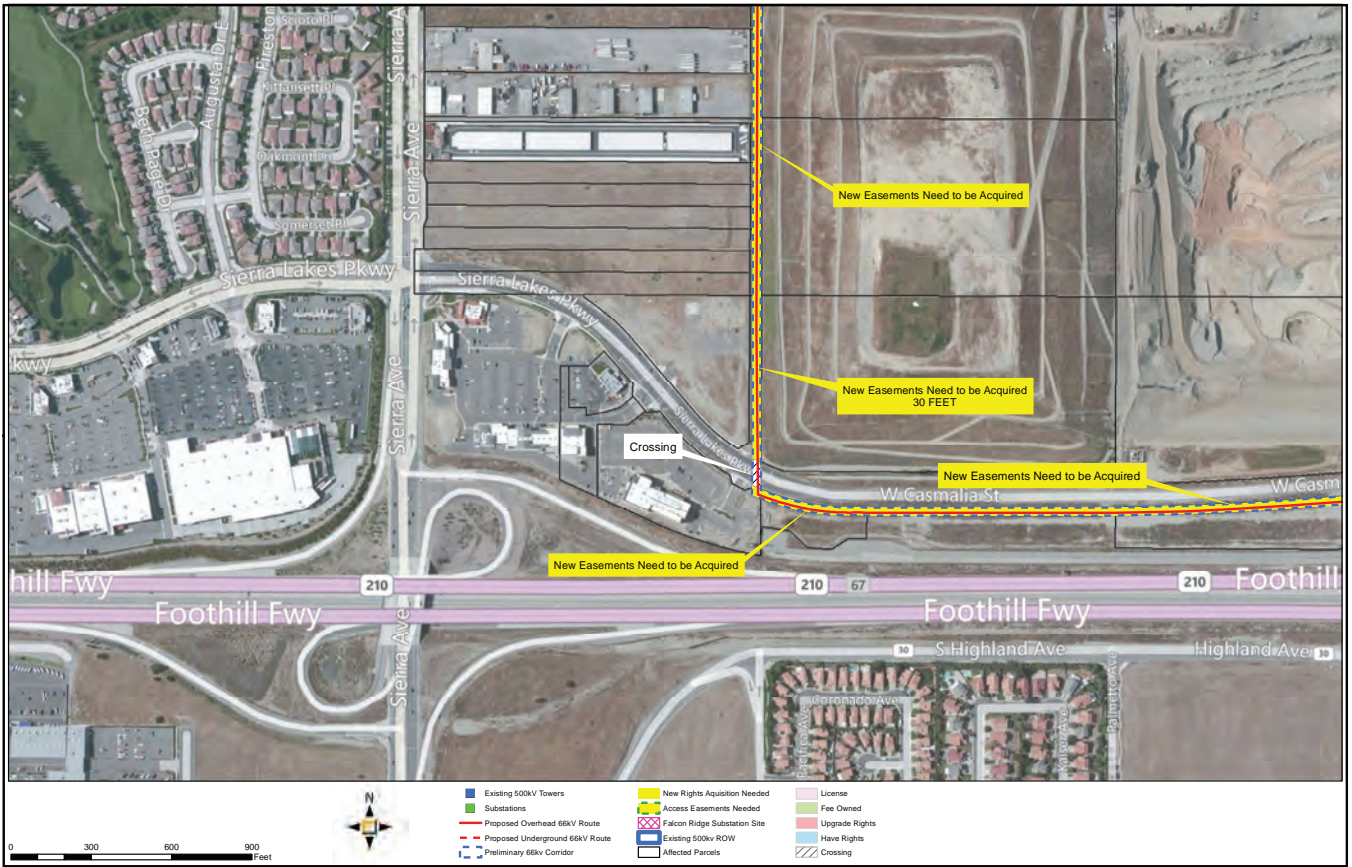
Proposed Falcon Ridge Substation 66kV Corridor Acquisition



SOURCE: SCE, 2012

Falcon Ridge Substation Project . 207584.09

Final EIR Figure 2-3b
Proposed Falcon Ridge Substation 66kV Corridor Acquisition



SOURCE: SCE, 2012

Falcon Ridge Substation Project . 207584.09

Final EIR Figure 2-3c
Proposed Falcon Ridge Substation 66KV Corridor Acquisition

expansion of the existing easement area. Potential direct, indirect, and cumulative environmental effects associated with the development of this area are analyzed on a resource-by-resource basis in the EIR.

- C-3.10 CEQA Guidelines section 15124 establishes that an EIR must provide a “general description” of the proposed project and “should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.” The Court has interpreted this “general description” requirement to mean “involving only the main features of something rather than details or particulars” (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 28). The rationale for requiring only a general description furthers the principle that an EIR should be prepared early enough in a project’s planning stages to allow environmental considerations to influence the project’s design (Id., see also CEQA Guidelines §15004). Each of the main features of the Project is described in Chapter 2 of the Draft EIR, and no suggestion has been made that any integral component has been omitted.

Please see Response C-1.4 regarding the depiction of pole locations. Although final pole locations are not yet known, poles would be approximately evenly spaced throughout the subtransmission source line routes and are adequately depicted in visual simulations (see Draft EIR Figures 4.1-3 through 4.1-10).

- C-3.11 Table 10 in Draft EIR Appendix C, *Air Quality Calculations*, shows estimated dump truck trips associated with the 7,000 cubic yards (cy) of combined substation soil import and export (63 daily trips or a total of 504 trips over 8 days). Further materials hauling trips also are described throughout this table. These trip estimates form the basis of the air quality impacts analysis in Section 4.3, *Air Quality*. As described on Draft EIR page 4.17-8, truck trip estimates include trips related to hauling material to and from work sites; this includes trips related to hauling excavated materials off-site.

Page C-12 in Draft EIR Appendix C, *Air Quality Calculations*, shows an estimated two daily dump truck trips for 90 days for hauling excavated materials from TSP foundation installation (maximum of 2,000 cy for all 50 TSPs). This estimate is consistent with TSP foundation auger hole dimensions given in Table 2-1, *Approximate Subtransmission Structure Dimensions*, on Draft EIR page 2-12. Also listed in Table 2-1 are auger hole dimensions for wood poles and LWS poles. Based on these numbers, the maximum total amount of excavated materials for all wood and LWS poles would be approximately 1,300 cy; however, as stated on page 2-26, Section 2.9.4.1, *Pole Installation*, “Once the poles are set in place, excavated materials would be used to backfill the hole. ... Excess excavated materials would be distributed at each pole site, used as backfill for the holes left after removal of nearby poles (if any), or disposed of off-site in accordance with all applicable laws.” Because soil conditions are site-specific, it cannot be estimated at this time what portion of excavated materials would need to be disposed of off-site, but total volumes would be minimal due to the preference for backfilling or distributing excess materials on-site within SCE’s ROW. No materials are anticipated to be hauled off-site in association with construction of new access roads.

C-3.12 Draft EIR page 4-2 states, “Pursuant to CEQA Guidelines §15125(a), the environmental setting used to determine the impacts associated with the Project and alternatives is based on the environmental conditions that existed in the study area in March 2011 at the time the NOP was published.” Consistent with this approach, the existing environmental conditions described in Section 4.11, *Land Use and Planning*, note that the Etiwanda Subtransmission Source Line Route currently traverses the Summit at Rosena Specific Plan area. See Response C-3.1. See also Responses C-3.8 and C-3.9 regarding that portion of the Project that would be located outside the existing ROW. As explained in Response C-3.1, the Summit at Rosena Specific Plan is not an “applicable land use plan, policy or regulation” for purposes of Land Use and Planning significance criterion (b). CEQA Guidelines section 15124 advises that an EIR “should not supply extensive detail beyond that needed for evaluation and review of [environmental impacts].” Therefore, because the requested inclusion of information about specific plan consistency would not inform decision makers or members of the public about the environmental effects of the Project, the Draft EIR *has not been supplemented* to include the requested information.

Although the Summit at Rosena Specific Plan is not a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, the CPUC is aware that the Project components within the existing ROW within the Summit at Rosena Specific Plan area would be located within planning areas 5, 6, and 7. The area of new 30-foot easement outside and to the south of the existing ROW west of the proposed Falcon Ridge Substation would be located within planning areas 9, 10, and 11 (City of Fontana, 2010). *Accordingly, the discussion below is being provided for informational purposes only; again, the EIR has not been supplemented to include this information.*

Together, Summit at Rosena planning areas 5, 6, and 7 have been designated for recreational use: the development’s planned 20-acre Edison Trails Park. As described in Specific Plan section 3.2.1, this planned park would consist of open space and recreational uses, including trails and gardens, within SCE’s existing ROW and permitted by license agreement with SCE. The Specific Plan anticipates that if the license agreement were cancelled or altered by SCE before construction of the park, the Specific Plan developer would “provide community amenities within the Specific Plan area in addition to those required by the Specific Plan or pay fees to the City for offsite amenities with a value equivalent to that of any portions of Edison Trails Park yet to be constructed” (City of Fontana, 2010, p. 3-2). No portion of the Edison Trails Park has yet been constructed. Implementation of the Project now before the CPUC could result in alteration or cancellation of this agreement. The EIR prepared for the Summit at Rosena Specific Plan (City of Fontana, 2005²⁴) contemplated an option for that project that would not have included this park and found that the effects on recreation would not be significant.

²⁴ City of Fontana, 2005. Summit at Rosena Specific Plan Volume III, Final Environmental Impact Report (September 2005).

The Summit at Rosena's planning areas 8 and 11 were intended to accommodate single-family residential development at a density of 10 dwelling units per acre. The new easement would remove approximately 0.04 of 5.10 acres from planning area 8 and approximately 0.5 of 12.65 acres from planning area 11. Because the precise locations of individual lots are not indicated within the Specific Plan and a copy of the tentative map has not been provided, the CPUC has not been able to verify how many lots would be directly affected by SCE's proposed expansion of the existing easement.

The Summit at Rosena Specific Plan envisions the development of a 1.75-acre pocket park that would provide picnic tables, benches, barbecues, two half-court basketball courts, and restroom facilities. The location of proposed 30-foot expansion of SCE's existing easement in this location would remove approximately 0.15 acre from this planning area and would encroach upon the planned location of the half-court basketball courts and restroom facilities (City of Fontana, 2010, p. 2-3).

The Summit at Rosena Specific Plan envisions the development of approximately 72 single-family homes on 6,000-square-foot lots and a neighborhood park in planning area 10. SCE's proposed 30-foot expansion of its existing easement would remove approximately 0.6 acre from this planning area and would encroach upon the planned locations of six residential lots and two cul-de-sacs abutting the northern border of the planning area (City of Fontana, 2010, p. 3-16).

The EIR prepared for the Summit at Rosena Specific Plan analyzed an option to develop the Specific Plan area at much lower density. The EIR found that option to be environmentally superior compared to the Specific Plan, and found that it would feasibly attain most of the basic objectives of the Specific Plan, but "would not meet a variety of the project's community objectives, including those regarding recreational opportunities, educational spaces, and interrelated land uses" (City of Fontana, 2005, pp. 4-14, 4-23).

- C-3.13 The general summary regarding CEQA requirements for alternatives is noted. The comment expresses an opinion that the number of alternatives to the Project that were considered in the EIR "is very limited," no indication is made in this comment as to what additional or different alternatives, if any, should have been considered.
- C-3.14 The development of alternatives is driven by the intent to avoid or substantially lessen the significant adverse effects of a project. The significant adverse effects of the proposed Project include air quality, aesthetics, and noise-related impacts. Several among the potential alternatives discussed in Draft EIR Chapter 3 examine only short portions of subtransmission source line routes to avoid or substantially lessen one or more of these impacts. As described on pages 3-16 and 3-17 of the Draft EIR, Alternatives 6 and 7 would replace the proposed Alder Subtransmission Source Line Route. This portion of the proposed Project is associated with significant unavoidable impacts from construction-related air quality emissions. Alternatives 6 and 7 were developed along with several other route options for the purpose of avoiding or reducing these effects, but were eliminated from full evaluation in the Draft EIR because when compared to

Alternative 1, which was developed for the same purpose, they were not as environmentally beneficial as Alternative 1. Therefore, of Alternatives 1, 6, and 7, only Alternative 1 was carried forward. The additional potentially hazardous conditions along these alternative routes were disclosed in the analysis of alternatives for informational purposes, but did not drive the decision by CPUC to eliminate these alternatives from more detailed consideration. Regarding Alternative 1, see MR1.

C-3.15 For discussion of undergrounding alternatives, see MR3(D).

C-3.16 As described in detail on Draft EIR pages 3-21 and 3-22, the rationale for eliminating Alternative 14 primarily is focused on the alternative's inability to meet the basic Project objective of maintaining and enhancing reliability. Furthermore, based on the limited capacity of the existing infrastructure, it would only delay the need for the Project by 1 to 2 years and, therefore, would neither avoid the proposed Project nor eliminate its potential environmental impacts. The technical limitations of SCE's existing infrastructure independently were verified by the CPUC's environmental consultant (see footnote 2 in the Executive Summary of the Draft EIR, p. ES-2 and Response A-1.10). When combined, the environmental impacts of implementing Alternative 14 and then implementing the proposed Project in 1 to 2 years would be greater than the effects of the Project alone.

C-3.17 Please note that CPUC staff, not the Applicant (SCE), is responsible for the content of the EIR. Alternative 2: Phased Construction was developed to avoid or substantially lessen significant unavoidable impacts from construction-related criteria air pollutant emissions, which exceed daily significance thresholds. Commenter incorrectly states that this alternative would increase the construction phase "from 12 months to 15 months;" rather, as described on Draft EIR page 3-12, it would increase the construction phase *by 15 months*, or by over 1 year. As stated in CEQA Guidelines section 15364, feasibility is defined 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." Because this delay would push the Project's "on-line" date past June, 2014, it would not meet the Project objective of serving existing and projected demand by June, 2014. In addition, it was determined that this alternative could result in significant air quality impacts regardless of scheduling due to the need for interim facilities.

California Public Utilities Code section 1002.3 requires the CPUC to consider "cost-effective alternatives to transmission facilities that meet the need for an efficient, reliable, and affordable supply of electricity, including, but not limited to, demand-side alternatives such as targeted energy efficiency, ultraclean distributed generation, as defined in Section 353.2, and other demand reduction resources." Pursuant to this requirement, the CPUC screened the feasibility and ability of two alternatives (Alternative 12: Non-Wires Alternative – Conservation and Demand Management, and Alternative 13: Non-Wires Alternative – New Renewable or Conventional Distributed

Generation Energy Resources) to determine whether either or both would meet most of the basic objectives of the Project. However, as summarized in Draft EIR Table 3-3 (p. 3-10), neither of these alternatives met the criteria for more detailed consideration.

- C-3.18 CEQA Guidelines section 15204(a) states, “Comments [on a Draft EIR] are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects.” At the same time, an alternative that would require a greater degree of undergrounding would not substantially reduce significant effects of the Project. For discussion of alternatives that would involve a greater degree of undergrounding, see MR3(D). Regarding Alternative 1 and the fact that it crosses the BF Goodrich Superfund site, see MR1.

Reviewers of a Draft EIR should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts, in support of comments (CEQA Guidelines §15204(c)). However, this comment provides insufficient rationale to support its assertion that the alternatives analysis in the Draft EIR is insufficient. Without the type of explanations contemplated by CEQA Guidelines section 15204, the CPUC has insufficient information to provide a more detailed response.

Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (Pub. Res. Code §§21080(e), 21082.2(c); 14 Cal. Code Regs. §15384). CEQA Guidelines section 15384 clarifies that substantial evidence means “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached” (Id.). Based on Draft EIR Table 3-2 (p. 3-6), other data and information provided in Chapter 3, and other information in the administrative record, substantial evidence supports the CPUC’s rejection of alternatives from more detailed consideration.

- C-3.19 The methodology for choosing visually sensitive locations is described in Draft EIR Section 4.1, *Aesthetics* (p. 4.1-1 et seq). The visual sensitivity of a location is a function of several variables, including the visual quality of the site (industrial, representative, or distinctive), viewer exposure (landscape visibility, viewing distance, viewing angle, extent of visibility, and duration of view), and viewer type and volume (public, recreationalist, motorist, pedestrian, etc.). As explained on Draft EIR page 4.1-2, “People in different visual settings, typically characterized by different land uses surrounding a project, have varying degrees of sensitivity to changes in visual conditions depending on the overall visual characteristics of the place. In areas of more distinctive visual quality, such as designated scenic highways, designated scenic roads, parks, and recreation and natural areas, visual sensitivity is characteristically more pronounced. In areas of more indistinctive or representative visual quality, sensitivity to change tends to be less pronounced, depending on the level of visual exposure.”

Key observation points (KOPs) used to generate simulations of the Project were chosen from locations identified as visually sensitive, based on the characteristics described

above and based on input received from local agencies and others during the scoping process. Because it would be infeasible to provide visual simulations from all locations with views of the Project, eight KOPs were selected on the basis that the views selected for simulations represent the broader set of views of the Project in the surrounding landscape and capture each kind of visually sensitive location. Specifically, KOPs were chosen that represent major or scenic travel routes, with and without scenic vistas (KOPs 3, 5, 6, 7, and 8), and recreational areas (KOPs 1, 2, and 4). Views depicted in the simulations are representative of views from other visually sensitive locations. For example, visual changes to scenic views from the Beech Avenue and Cherry Avenue scenic corridors would be comparable to those shown for Citrus Avenue in Draft EIR Figure 4.1-5. The visual change perceived by viewers on Foothill Boulevard and Wilson Avenue would be comparable to that shown for Baseline Avenue in Draft EIR Figure 4.1-6. Visually sensitive locations without an analogous simulation, such as SR 210, were described qualitatively in enough detail to determine the impact significance (see Draft EIR, p. 4.1-29 et seq.)

Moreover, CEQA Guidelines section 15204(a) states that a lead agency is not required to conduct every test or to perform all research, study, and experimentation recommended or demanded by commenters. Because the visual simulations in the Draft EIR are representative of the viewsheds that would be affected by the Project, the visual simulations have not been augmented as suggested by the commenter.

C-3.20 Regarding Draft EIR consideration of views for non-motorists (i.e., recreationalists and pedestrians), see Response B-5.2.

The commenter questions the absence of visual simulations for residential communities, such as homeowners within the Heritage Village neighborhood in the City of Fontana. As stated on page 492 of the court's decision in *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, "Under CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons." Further, "California landowners do not have a right of access to air, light and view over adjoining property" (Id.). Lead agencies have discretion to determine whether or not to classify an impact described in an EIR as "significant," and, in exercising this discretion, necessarily involves policy decisions (CEQA Guidelines §15064(b)).

As explained in Response C-3.19, land uses that derive value from the quality of their settings are considered potentially sensitive to changes in visual setting conditions. In analyzing the potential aesthetic effects of this Project, the CPUC exercised its discretion to prioritize public views accessible to a broader spectrum of the public over private views from specific developments or neighborhoods; in other words, the CPUC exercised its discretion to identify potentially sensitive land uses as including major transportation routes, designated scenic roadways, scenic vistas, and designated park, recreation and natural areas. As a result, sensitive viewer groups were developed in Section 4.1,

Aesthetics, using locations with views of these potentially sensitive land uses, where a moderate to high number of viewers has access to the views. For the analysis, this included: motorists on major or scenic travel routes (Foothill Boulevard; Beech, Sierra, Citrus, Cherry, Etiwanda, Wilson, Baseline, and Highland Avenues; I-15 and SR 210); visitors to recreational areas (Fontana Park, Garcia Park, Heritage Common Areas, Heritage Park, Heritage Pool/Heritage Neighborhood Center, North McDermott Sports Complex & McDermott Park West, Patricia Murray Park, Rosena Park East, and Rosena Park West); and scenic vistas (scenic corridors listed above under scenic travel routes). Visual simulations were developed for representative locations (see Response C-3.19).

Notwithstanding the fact that visual simulations were not specifically prepared from the perspective of local private residential communities, potential aesthetic impacts to Heritage Village are analyzed in the Draft EIR in the context of views from West Liberty Parkway, a local roadway in the vicinity of several local parks in the Heritage Village neighborhood (see Draft EIR, p. 4.1-32). Impacts related to this KOP were determined to be adverse but not significant.

C-3.21 This comment is addressed in Response B-5.1.

C-3.22 The methodology used to evaluate potential impacts to visual resources is described in Draft EIR Section 4.1, *Aesthetics*. Definitions related to visual resources, including metrics used to define overall visual sensitivity of the Project area, are provided on Draft EIR pages 4.1-1 and 4.1-2. CEQA significance criteria and definition and use of significance criteria are described starting on page 4.1-14, including key factors used to determine the degree of visual change that the Project would cause. The determination of impact significance is based on the combined factors of visual sensitivity and the degree of visual change. The inter-relationship of these two factors in determining whether adverse visual impacts are significant is shown in Draft EIR Table 4.1-2, *Guidelines for Determining Adverse Visual Impact Significance* (p. 4.1-16).

The CEQA Guidelines provide significance criteria for four specific areas of aesthetic concern in Appendix G: scenic vistas, scenic highways, visual character and quality of the project site, and light and glare. In the absence of additional CEQA guidance, it is the responsibility of the Lead Agency, here the CPUC, to determine what constitutes a “substantial” effect, damage, degradation, or new source of light or glare. The CPUC and EIR preparers developed the methodology used in Section 4.1 by adapting principles and approaches taken by the following three federal systems for visual resource management:

- **The U.S. Department of Agriculture, Forest Service (USFS), *Landscape Aesthetics, a Handbook for Scenery Management*.** This document was developed to present a vocabulary for managing scenery and a systematic approach for determining the relative value and importance of scenery in a national forest. The handbook’s Scenery Management System (SMS) evolved from and replaces the Visual Management System (VMS) defined in Agricultural Handbook #462 (1974), and its principals and premises are based on research findings and 20 years’ experience with VMS (U.S. Department of Agriculture, Forest Service, 1995).

Landscape Aesthetics, a Handbook for Scenery Management. Agriculture Handbook No. 701. December).

- **The U.S. Department of the Interior, Bureau of Land Management (BLM), *Manual 8400 – Visual Resource Management*.** BLM’s Visual Resource Management (VRM) system provides a way to identify and evaluate scenic values to determine the appropriate levels of management. It also provides a way to analyze potential visual impacts and apply visual design techniques to ensure that surface-disturbing activities are in harmony with their surroundings. Manual 8410, Visual Resource Inventory, provides a means for determining visual values. Manual 8431, Visual Resource Contrast Rating, outlines a contrast rating system that is a systematic process to analyze potential visual impact of proposed projects and activities (U.S. Department of the Interior, Bureau of Land Management, 2012. Manual 8400 – Visual Resource Management. Available at <http://www.blm.gov/nstc/VRM/vrmsys.html>. Accessed April 23, 2012).
- **U.S. Department of Transportation, Federal Highway Administration (FHWA), *Visual Impact Assessment for Highway Projects*.** This field guide is intended to help those who prepare or review the coverage of visual impacts in environmental assessments or impact statements for highway projects. The guide presents an approach to identifying the potential importance of visual effects and assessing the nature of these effects. The guide recommends that, within the framework of this approach, the choice of specific assessment techniques should be tailored to the project in terms of appropriate detail and level of effort (U.S. Department of Transportation, Federal Highway Administration, Office of Environmental Policy, 1981. Visual Impact Assessment for Highway Projects. Publication No. FHWA-HI-88-054. Available at <http://www.dot.ca.gov/ser/downloads/visual/FHWAVisualImpactAssmt.pdf>. Accessed April 23, 2012).

The resulting methodology is well-suited to the types of aesthetic impacts that arise in the context of substation, subtransmission line, and similar types of projects. The CPUC has relied on this methodology to analyze the potential aesthetic impacts of multiple projects.

C-3.23 This comment is addressed in Response B-5.1.

C-3.24 Per CEQA Guidelines section 15125(a), “An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published... This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.”

The environmental setting for the land on which Falcon Ridge substation would be constructed is described in the Draft EIR in Section 4.1, *Aesthetics*, page 4.1-6, and is shown in Photo A in Figure 4.1-2a. Although the viewshed contains scenic features such as open space covered with grass and brush and views of the San Bernardino and San Gabriel Mountains to the north, the viewshed also has industrial components. Existing transmission towers, distribution poles, and utility lines are established features

within the landscape setting, as are a series of industrial buildings to the east associated with a Target distribution center. Given the visual quality of the site (representative to distinct), and view exposure (Project would be in foreground distance with unobstructed views, a high number of viewers, and short to medium view duration), the Draft EIR determines that the overall sensitivity of the proposed substation site is moderate to high.

As described on Draft EIR page 4.1-14, an adverse visual impact may occur when: (1) an action perceptibly changes the existing physical features of the landscape that are characteristic of the region or locale; (2) an action introduces new features to the physical landscape that are perceptibly uncharacteristic of the region or locale, or become visually dominant in the viewshed; or (3) an action blocks or totally obscures aesthetic features of the landscape. As shown in Draft EIR Figure 4.1-4 and explained on page 4.1-26 et seq., for KOP 6, industrial features are a component of the existing physical features of the landscape that cannot be ignored. The addition of new industrial features associated with the Project occurs within the context of the existing character of the site, as the existing site characteristics influence not only the visual sensitivity of the site itself, but also how noticeable the adverse change is.

For KOP 6, the overall visual contrast created by Project construction would be weak to moderate, as the Project would begin to attract attention but would not dominate the landscape. The Project would co-dominate the landscape with the existing industrial features (e.g., SCE's existing transmission line and lattice structures, and the Target distribution center) and natural features (e.g., the scenic San Bernardino Mountains). The short height of the proposed substation and the narrowness of the proposed subtransmission poles would prevent Project features from obstructing views of the aesthetic features in the landscape. After establishment of landscaping around the perimeter of the substation, and with implementation of Mitigation Measure 4.1-1, the overall visual change would be low to moderate. Taking into account Sierra Avenue's moderate-to-high visual sensitivity, per Table 4.1-2, the resulting visual impact to scenic views at this KOP would be adverse but not significant.

Cumulative impacts to visual resources are addressed in Section 6.2.1 of the Draft EIR (p. 6-7 et seq.). See, for example, Draft EIR page 6-8, which states: "Should full build-out of the proposed master-planned community... and specific plan communities... occur, there could be a cumulative impact on views.... The new communities would develop a large portion of the view corridor available from [specified] roadways and would result in a close-range, high degree of visual change in land that is currently vacant.... Given the moderate to moderate-high visual sensitivity of the roadways in question, and the close proximity of Project components and these cumulative projects, the Project's incremental contribution would be cumulatively considerable to scenic vistas.... No mitigation is feasible that would reduce impacts from these locations to less than significant, as screening techniques to reduce impacts from Project components would be wholly ineffective in mitigating visual impacts from other cumulative projects

given the size, scale and character of the cumulative projects (i.e. large scale residential and commercial developments.”

C-3.25 This comment is addressed in MR3.

C-3.26 As explained in the discussion of the environmental baseline provided on page 4-2 of the Draft EIR, the “effects of the Project and alternatives are defined as changes to the environmental setting that are attributable to project components or operation. Pursuant to CEQA Guidelines §15125(a), the environmental setting used to determine the impacts associated with the Project and alternatives is based on the environmental conditions that existed in the study area in March 2011 at the time the NOP was published.” Because future homes are not part of baseline conditions, Draft EIR Section 4.1 (p. 4.1-1 et seq.) does not analyze the direct and indirect effects of the Project relative to them. Regarding the Draft EIR’s analysis of the cumulative aesthetic impacts relative to future homes to be constructed as part of the Summit at Rosena Specific Plan and other proposed developments, see Response C-3.24.

C-3.27 Draft EIR Chapter 2, *Project Description*, provides the construction schedule for the Project under Section 2.12. Work hours would be in accordance with local noise ordinance. Hours for construction work are provided in Table 2-7, which indicates that permitted hours range from as early as 6:00 a.m. to as late as 7:00 p.m., depending on the jurisdiction. Thus, nighttime construction is not proposed or anticipated under the Project. Variances would be obtained from the local jurisdiction as necessary in the event construction activities would occur on days or hours outside of what is specified by ordinance. Given SCE’s commitment to orient lights to minimize their effect on nearby receptors and the relatively short time-frame during which construction would occur, the possibility of rare occurrences of nighttime construction is not sufficient to constitute a new source of substantial light that could adversely affect views in the area. Consequently, impacts are less than significant, and there is no basis under CEQA to require SCE to prepare a photometric plan.

C-3.28 Neither the subtransmission source line poles nor any other Project component would exceed an overall height of 200 feet or more above ground level or exceed any obstruction standard contained in 14 CFR part 77. Therefore, as indicated in FAA Advisory Circular AC 70/7460-1K, *Obstruction Marking and Lighting*²⁵, no nighttime lighting would be required to comply with FAA regulations.

C-3.29 General Order No. 131-D clarifies that local jurisdictions are preempted from regulating the Project. As described in Section 4.11, *Land Use and Planning*, Section XIV.B requires that in locating a project “the public utilities shall consult with local agencies regarding land use matters.” This is a requirement of the Applicant in its project siting

²⁵ U.S. Department of Transportation Federal Aviation Administration (FAA), 2007). Advisory Circular AC 70/7460-1K, *Obstruction Marking and Lighting*. Available online: [http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/b993dcdcf37fcdc486257251005c4e21/\\$FILE/AC70_7460_1K.pdf](http://rgl.faa.gov/Regulatory_and_Guidance_Library/rgAdvisoryCircular.nsf/0/b993dcdcf37fcdc486257251005c4e21/$FILE/AC70_7460_1K.pdf) (February 1, 2007).

process, not of the CPUC in its CEQA review of a proposed project. However, to inform the public and decision makers, CPUC staff has discussed relevant local policies and regulations throughout the Draft EIR. See, for example, Draft EIR Section 4.11, *Land Use and Planning*, which provides a discussion of the Project's compatibility with local land use policies.

- C-3.30 Under CEQA, the lead agency "shall be responsible for preparing an EIR" (14 Cal. Code Regs. §15050). Consistent with CEQA Guidelines section 15050, Draft EIR Section 1.3.1 (p. 1-2 et seq.) explains: "The CPUC is serving as the CEQA 'Lead Agency' for this Project. A lead agency is the public agency that has the primary responsibility for approving a proposed project *and the one responsible for preparing the appropriate CEQA document.*" (emphasis added). Accordingly, the Draft documents the decisions, discussion, and analysis of the CPUC, not SCE.

The CPUC disagrees with the assertion that local regulations were selectively ignored. Instead, local regulations were discussed as part of the regulatory context on a resource-by-resource basis throughout Draft EIR Chapter 4. See, for example, Draft EIR Section 4.2.1 (p. 4.2-5 et seq.), which summarizes agricultural resource-related provisions of land use and planning documents of San Bernardino County and the cities of Rialto and Rancho Cucamonga.

As described in Section 4.2, *Agriculture and Forestry Resources*, the CEQA Guidelines Appendix G criteria require an analysis of a project's potential effects on farmland as mapped by the Farmland Mapping and Monitoring Program. The Draft EIR correctly relies on a previous analysis of the effects of converting the 3.39 acres of Unique Farmland located within the proposed new ROW for the Etiwanda Subtransmission Source Line Route pursuant to Public Resources Code section 21083.3 and CEQA Guidelines section 15183. Draft EIR page 4.2-5 states, "...the City of Fontana General Plan does not include goals and policies for the management of agriculture or forestry resources." Instead, based on the city's zoning of state-designated farmland for mixed use and residential development rather than for agricultural purposes, the City of Fontana General Plan Update demonstrates the City's intent to convert over 600 acres of Unique Farmland, including the 3.39 acres within the proposed new ROW, to non-agricultural uses. The EIR prepared for the city's General Plan Update adequately assesses the impacts of this loss of farmland. No further analysis is needed to assess the effects of the proposed Project.

Further, the CEQA Guidelines Appendix G criteria relating to potential impacts to agricultural resources focus on the potential conversion of lands bearing particular designations made pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency and potential conflicts with existing zoning designations. The significance criteria do not require the lead agency to analyze the "merits of the land for future farming purposes" as suggested in the comment. Regardless of whether the acreage now occupied by the abandoned vineyard described and analyzed on Draft EIR

page 4.2-7 “appears to be potentially important land for continued agricultural purposes,” CEQA does not require an assessment of speculative potential future uses.

C-3.31 The LST look-up tables are intended to be used as screening tables to determine if construction or operation of a project may result in a violation of an applicable air quality standard at any given sensitive receptor location. Had the LST look-up table analysis indicated that the Project could result in a violation of an applicable air quality standard, then dispersion modeling would have been conducted to support a health risk assessment for the nearby residences. Because this was not the case here, no more detailed analysis was required. See also Response C-3.33.

C-3.32 As disclosed in the sensitive receptors discussion on Draft EIR pages 4.3-5 and 4.3-6, the proposed Etiwanda Subtransmission Source Line Route is the closest Project component to existing schools, daycare facilities, and residences. A daycare facility is approximately 150 feet from the route and the closest residences are approximately 30 feet from the route. In the absence of more refined screening data, the shortest (i.e., 25-meter) available distance was used for the LST analysis relative to the subtransmission source line route. The use of dispersion modeling to support a health risk assessment associated with construction of the subtransmission source line route in the vicinity of the closest residences was deemed to not be necessary given that construction activities in that area would likely be limited to a few workdays at any one location and because the maximum daily emissions (e.g., 2 pounds of PM10; see Draft EIR Table 4.3-8 on page 4.3-20) would be miniscule. The data, other information, and analysis provided in Draft EIR Section 4.3 (p. 4.3-1 et seq.) and elsewhere in the administrative record for this Project provide substantial evidence in support the impact significance conclusions reached.

C-3.33 Collectively, the Project would disturb a total of more than 160 acres; however, the disturbance would occur at several hundred sites dispersed over an area of approximately 12 miles along the subtransmission source line routes. The various individual construction sites along the proposed source line routes would range from approximately 0.5 acre to 5.0 acres, and the Falcon Ridge Substation site would be approximately 2.7 acres. Because the LST look-up table emissions are lower (i.e., more conservative) for the smallest available project sizes, the LST look-up table emissions for 1-acre sites were used to represent construction activities at sites along the proposed source line routes and the LST look-up table emissions for 2-acre sites were used to represent the construction activities at the Falcon Ridge Substation site. The resulting analysis magnifies potential effects and results in more conservative (i.e., human health-protective) conclusions.

It also should be noted that in its comment letter on the Draft EIR (Comment Letter B-4), the SCAQMD identified no concerns related to the use of its LST look-up tables in the analysis of sensitive receptors. See also Responses C-3.31 and C-3.32.

C-3.34 As described on Draft EIR page 4.4-31, direct effects can include incidental take during construction or the loss of occupied habitat. As described on page 4.4-32, it is anticipated

that the Project would directly affect (by removing or destroying the plant or through loss of habitat supporting the species) up to 22 individuals of Plummer's mariposa lily and 47 individuals of Parry's spineflower.

APM-BIO-02 is proposed by the Applicant and therefore is part of the Project description. Therefore, the CPUC cannot make changes to APM-BIO-02. However, the CPUC can (and as indicated by the development of Mitigation Measure 4.4-1 has) supplemented the Applicant-proposed measure. The analysis documented in Draft EIR Section 4.4, *Biological Resources*, determined that APM-BIO-02 was not adequate to fully avoid potential impacts to special-status plant species or to mitigate them below established levels of significance. The implementation of Mitigation Measure 4.4-1, together with APM-BIO-02, would reduce potential impacts to a less-than-significant level.

As set forth below and in Chapter 3 of this Final EIR, revisions have been made on pages 4.4-22 and 23 of the Draft EIR to clarify that the Riversidean sage scrub vegetation community supports these plants. Mitigation Measure 4.4-1 requires avoidance of and compensation for both the affected individuals of special-status species and the Riversidean sage scrub habitat that supports these species. The mitigation measure requires SCE and its contractors to avoid and minimize impacts to special-status species to the extent feasible, acknowledging that based on the final locations of Project components, SCE may not be able to avoid all individuals or habitat. However, full compensation for impacts that cannot be avoided is required; this will fully mitigate potential impacts to special-status plants.

The last sentence on page 4.4-22 is revised as follows:

This perennial bulbiferous herb occurs in coastal sage scrub (including Riversidean sage scrub); dry, rocky chaparral; and yellow-pine forest at elevations between 0 and approximately 5,580 feet amsl (Hickman, 1993).

The second sentence of the second paragraph on page 4.4-23 is revised as follows:

This annual herb occurs in open, sandy sites, often on gravelly slopes in coastal or desert scrub (including Riversidean sage scrub) at elevations between approximately 980 and 3,940 feet amsl (Hickman, 1993).

C-3.35 As identified in Impact 4.4-2 (Draft EIR, p. 4.4-34 et seq.), several special-status birds may be encountered in the Project area during construction due to the presence of suitable habitat, which includes bare ground and Riversidean sage scrub habitat. The three special-status birds were identified with the potential to forage or nest in or near construction areas, and include loggerhead shrike, burrowing owl (foraging habitat only, no suitable nesting habitat present), and grasshopper sparrow. The Migratory Bird Treaty Act and California Fish and Game Code prohibit impacts to active bird nests during the breeding season, which is generally the period from March 15 to September 15. These

laws similarly protect the nests of common bird species. Construction activities that are performed outside the bird nesting season would not disrupt the nesting activities of common or special-status birds; thus, there would be no impact to breeding birds. For construction activities performed during the nesting season, the implementation of APM-BIO-01 to establish protective buffers around identified nests is sufficient to avoid impacts to individual nests. The temporary loss of habitat for non-listed species is not considered a significant impact under CEQA; however, implementation of the measures that are required to protect and restore sensitive plant communities would benefit local and migratory bird populations as well as sensitive plant communities. Accordingly, the Draft EIR's analysis of potential impacts to the avian species identified in this comment is adequate, and related impact conclusions are adequately supported by substantial evidence.

- C-3.36 As described on Draft EIR page 4.4-31, direct effects include incidental take during construction or the loss of occupied habitat. As described under Impact 4.4-2 (Draft EIR, p. 4.4-34), habitat for coast horned lizard, coast patch-nosed snake, burrowing owl, loggerhead shrike, grasshopper sparrow, San Diego black-tailed jackrabbit, northwestern San Diego pocket mouse, Los Angeles pocket mouse, San Diego desert woodrat, southern grasshopper mouse, American badger, and special-status bats is present in the Project area. With the implementation of APM BIO-01 (Draft EIR, p. 4.4-30), no impacts would occur to nesting special-status birds. The Project could result in incidental take of species associated with various habitat types in the Project area, and in particular with scrub and grassland habitat types, and cause a temporary loss of habitat for these species. Based on preconstruction survey findings, there is a low to moderate likelihood for direct take of coast horned lizard, coast patch-nosed snake, San Diego black-tailed jackrabbit, northwestern San Diego pocket mouse, Los Angeles pocket mouse, San Diego desert woodrat, southern grasshopper mouse, and American badger during construction. As identified on page 4.4-22, bat roosting is not expected in the Project area due to the absence of roosting habitat, and bat foraging, if present, would not occur during daytime construction. As identified in Mitigation Measure 4.4-2 (Draft EIR, p. 4.4-35), the required presence of a biological monitor during Project construction would ensure that any potential impacts to special-status wildlife species are avoided and minimized. If any of the above species are identified in the Project area, they would be passively or actively relocated prior to construction activities.

The second sentence of the sixth paragraph on page 4.4-19 is revised regarding habitat for San Diego pocket mouse:

Suitable habitat for the San Diego pocket mouse is present elsewhere in the study area, and they area presumed present in portions of the study area that support scrub vegetation communities, including Riversidean sage scrub.

Impacts to Los Angeles pocket mouse are discussed on Draft EIR page 4.4-35: "Project activities at the existing Etiwanda Substation and possibly at the Etiwanda staging area

would impact occupied habitat for the Los Angeles pocket mouse and would be considered potentially significant.”

Revisions have been made to page 4.4-34 to clarify that APM-BIO-2 also would reduce impacts to coast horned lizard, coast patch-nosed snake, San Diego black tailed jackrabbit, northwestern San Diego pocket mouse, Los Angeles pocket mouse, San Diego desert woodrat, southern grasshopper mouse, and American badger related to the loss of Riversidean sage scrub, a suitable habitat type for these species.

The last sentence of the second paragraph under Impact 4.4-2 (Draft EIR, p. 4.4-34 is revised as follows:

Project impacts on sage scrub habitat would be avoided and/or minimized to the maximum extent practicable through the implementation of APM-BIO-02, which would reduce potential impacts to coast horned lizard, coast patch-nosed snake, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, American badger, and Los Angeles pocket mouse.

C-3.37 The conclusion of Impact 4.4-4 (Draft EIR, p. 4.4-36) has been revised to clarify how compliance with Mitigation Measure 4.4-4 would reduce impacts to raptors and other birds to a less-than-significant level. This impact does not address bats because, due to their small size, bats would not come into contact with multiple wires causing electrocution. Due to bats’ use of echolocation, bat collisions with immobile tower structures and power lines are rare.

The sentence above Mitigation Measure 4.4-4 (Draft EIR, p. 4.4-36) is revised as follows:

The With implementation of Mitigation Measure 4.4-4, the Project would have at least the minimum separation between energized conductors or between energized conductors and grounded hardware that is sufficient to protect the largest birds; therefore, the Project would present little to no risk of bird electrocution. Line spacing and pole design also would lower the risk of collision. The potential for bird collisions or electrocutions that may occur as a result of the Project would be lowered such that this effect would not substantially reduce the number of state and/or federally protected birds, cause populations to drop below self-sustaining levels, restrict the range, or threaten to eliminate populations. Therefore, implementation of Mitigation Measure 4.4-4 would reduce potential impacts to a less-than-significant level.

C-3.38 Noise-related impacts on nesting birds are discussed on page 4.4-35 of the Draft EIR. These impacts would be avoided through nesting surveys and subsequent avoidance measures.

- C-3.39 The two resources that would be spanned by the proposed subtransmission line are P-36-002910 (National Old Trails Highway) and P-36-015497 (Baseline Road). The segment of P-36-002910 within the Project area is a portion of old Route 66 and is locally designated as Foothill Boulevard. Within the Project area, Foothill Boulevard is a four- to six-lane paved road. The segment of P-36-015497 within the Project area also consists of a four- to six-lane paved road. Proposed access roads and/or poles would not be located within these roadways; therefore, the Project would cause no impact to these resources.
- C-3.40 As discussed on pages 4.5-18 and 4.5-19 of the Draft EIR, none of the built historic resources or archaeological resources recorded within the Project area is likely to contain a buried archaeological component, and the overall archaeological sensitivity of the Project area is low. In addition, no prehistoric resources have been recorded within 0.25 mile of the Project area, resulting in a low probability of such resources existing within the Project area. Therefore, the proposed mitigation is adequate to reduce the impact from the inadvertent discovery of a previously unknown historical or unique archaeological resource discovered during ground-disturbing activities.
- C-3.41 When a proposed project could have a significant adverse effect on the environment, an EIR should be prepared as early as feasible in the planning process to enable environmental considerations to influence project design and yet late enough to provide meaningful information for environmental review (14 Cal. Code Regs. §15004(b)). Consistent with CEQA Guidelines section 15004(b), it is not necessary that the requested level of detail be provided as part of the Draft EIR. Detailed geotechnical study of the subtransmission source line route, associated facilities, and telecommunications system route would be performed prior to final project design as necessary to design the project in a manner that resists seismic forces and adverse soil conditions (see Draft EIR p. 2-16 et seq.; see also, Impact 4.7-1, p. 4.7-16).

The requested level of detail is not necessary to support the conclusion that impacts related to geologic and seismic hazards would be less than significant. Information in the setting was drawn from published sources (Draft EIR, pp. 4.7-5 to 4.7-10), and is adequate to provide the public and decision makers with sufficient detail regarding probable geologic and seismic hazards. The conclusion that impacts were less than significant was based on the nature of the project (e.g., no structures for human occupancy), required compliance with the California Building Code, and seismic design standards contained in CPUC General Order 95.

- C-3.42 As discussed under Impact 4.14-1 (Draft EIR, p. 4.14-6), Project operation would not directly or indirectly encourage new development or induce substantial population growth. Therefore, the Project would not be growth-inducing. No change has been made to the Draft EIR in response to this comment.
- C-3.43 Subsurface screening activities such as the use of DigAlert (Underground Services Alert of Southern California), visual observations, hand digging, and use of buried line locating equipment would occur after the Project has been approved and would occur under the

guidance of the applicable SCE or contractor construction crew. Reasons of public and worker safety dictate that such screening activities occur as close in time as feasible to the proposed work so that the screening results are current and comprehensive.

The potential to encounter underground storage tanks (USTs) is discussed in the third paragraph under Impact 4.9-2 on Draft EIR page 4.9-21; however, the first sentence of the paragraph has been revised as follows to indicate that the potential also exists for Leaking Underground Storage Tanks (LUSTs) to be encountered during construction of the Project:

During construction activities for the Project, the potential exists that subsurface utilities (e.g., a natural gas line) or structures (e.g., an UST or LUST) might be encountered and damaged, resulting in a release of a hazardous material.

C-3.44 As described under Impact 4.9-6 on Draft EIR pages 4.9-25 and 4.9-26, compliance with existing laws, regulations, and design standards would reduce the risk of wildfire associated with the Project; however, because portions of the Project area are located within high and very high fire hazard zones, implementation of Mitigation Measure 4.9-6 would be required. Implementation of Mitigation Measure 4.9-6 would result in the preparation and adherence to a Fire Prevention and Emergency Response Plan, which would contain several specific measures to ensure that the risk of fire impact would be reduced to a less-than-significant level. Specific requirements of the plan would include, but not be limited to: water trucks equipped with hoses must be on site during construction for immediate response in the event of a fire; Project sites must have fire extinguishers and fire-fighting equipment available; and all Project workers and visitors must receive fire-fighting equipment training. In addition, the plan would require SCE and/or its contractors to consult with local fire departments to identify appropriate protocols and procedures for fire safety and emergency. Therefore, implementation of Mitigation Measure 4.9-6 would reduce the potentially significant fire risk impact to a less-than-significant level.

Regarding the suggestion that the proposed poles could result in a new potentially significant impact to air-based fire suppression resources, the CPUC notes the fact that the majority of the proposed subtransmission line would be parallel and immediately adjacent to a much taller existing 500 kV transmission line, and that virtually all of the proposed subtransmission line route would continue to be readily accessible by public roads. Because the comment does not provide an explanation of why the new poles could be problematic for air-based fire suppression resources, a more detailed response has not been provided.

C-3.45 The analysis of potential water quality impacts associated with graded surfaces, impervious surfaces, and modification of drainage patterns documented in Draft EIR Section 4.10.4 (p. 4.10-17 et seq.) includes potential impacts that may be caused by the proposed access roads. While the details of the discussion focus on the proposed substation site, the applicable regulatory requirements discussed in the context of

significance criterion d) (Draft EIR, p. 4.10-20 et seq.) apply the whole of the Project. Further, Draft EIR Section 4.10, like other resource-specific analyses in the Draft EIR, analyzes potential impacts of the Project as a whole. The Project Description provided in Draft EIR Chapter 2, including Section 2.9.1 (p. 2-19 et seq.) and Figure 2-2 (p. 2-5) make clear that access roads are a part of the Project.

The conclusion that the Project would result in less-than-significant impacts is based on compliance with the requirement under the San Bernardino County MS4 permit (including local co-permittees) for the Project to prepare a stormwater quality management plan (WQMP). The WQMP must demonstrate that the Project would maintain the pre-development runoff rates, volumes, flow velocities, and flow durations. Because no building or grading permits for the Project would be granted prior to approval of a Project-specific WQMP, details and specifics regarding how or in what manner compliance would be achieved, or which specific BMPs would be used, are not necessary to conclude the Project would result in less-than-significant impacts.

C-3.46 CPUC General Order No. 131-D clarifies that local jurisdictions are preempted from regulating the Project. As described in Section 4.11, *Land Use and Planning*, Section XIV.B requires that in locating a project “the public utilities shall consult with local agencies regarding land use matters.” This is a requirement of the Applicant in its project siting process, not of the CPUC in its CEQA review of a proposed project. However, to inform the public and decision makers regarding the potential effects with respect to conflicts with land use plans, CPUC staff has discussed relevant local policies and regulations throughout the Draft EIR. Section 4.11, *Land Use and Planning*, provides a discussion of the Project’s compatibility with local land use policies. Section 4.11 has been revised to reflect the Project’s land use effects with respect to portions of the Etiwanda Subtransmission Source Line Route that would be located outside the existing ROW.

Regarding the request for analysis of Project consistency with Summit at Rosena Specific Plan Planning Areas 7, 8, and 9, see Response C-3.12. The Specific Plan was adopted in 2006 and updated in 2010 (City of Fontana, 2010). The planning areas appear to have been renumbered in the process of updating the Specific Plan; from the context of the comment, it appears the Commenter is referring to the original Figure 2.1 on page 2-2 of the Specific Plan. For consistency with the most recent version of the plan, this response will refer to the numbering in revised Figure 2.1 on page 2-3 (see detail below) in which these same areas are numbered 5, 6, and 7, respectively.

Regarding the status of the Development Agreement for the Summit at Rosena project relative to the CEQA significance criteria, see Response C-3.1. Regarding the status of the tentative map relative to the CEQA significance criteria, see Response C-3.2. Similarly, because implementation of the Project would not result in the displacement of “substantial numbers of *existing* housing” or residents, Draft EIR Section 4.14, *Population and Housing*, was correct not to consider planned but unbuilt homes or the setbacks shown in the Summit at Rosena Specific Plan.



Summit at Rosena Specific Plan Figure 2.1

C-3.47 As explained in Draft EIR Section 4.13, *Noise*, the community noise measurement survey conducted for the Project included an appropriate number of measurement sites to adequately characterize the existing noise environment at noise-sensitive receptors in the study area. No data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts is offered to support the suggestion that additional ambient noise sampling locations should have been selected. The CPUC's selection of the noise measurement locations shown in Figure 4.13-1 (p. 4.13-5) is supported by substantial evidence provided in Draft EIR Section 4.13.1, the input of resource area experts, and other materials included in the administrative record for this Project.

C-3.48 The commenter incorrectly suggests that the EIR preparers claimed that there was no need to evaluate potential construction-related noise impacts because the Project would comply with local municipal code exemptions. The commenter appears to base this conclusion on the impact discussion under criterion a), which is set forth in Draft EIR Section 4.13.2 (p. 4.13-11), relates to the potential for the project to exceed local ordinances, and is analyzed in Draft EIR Section 4.13.4 (p. 4.13-12). For a broader

impact discussion related to the potential for the Project to substantially increase noise levels relative to ambient conditions, see the analysis of Impact 4.13-5, which begins on Draft EIR page 4.13-18.

- C-3.49 The analysis of Project-related transformer and corona noise impacts relative to ambient noise levels is provided in the context of Impact 4.13-4 (Draft EIR, pp. 4.13-17, 4.13-18).
- C-3.50 No data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts is offered to support the assertion that the suggested 65 dBA threshold is either common or appropriate for use in assessing the significance of short-term construction-related impacts at sensitive receptor locations when the applicable local jurisdictions have not established a standard for this purpose. Similarly, the comment provides no information to support its assertion that the Draft EIR relies inappropriately on a daytime hourly L_{eq} level of 90 dB as the threshold to determine the significance of construction-related noise impacts.

Given that there are no applicable local policies or standards available to judge the significance of short-term construction noise levels in unincorporated San Bernardino County or the cities of Fontana and Rialto, the CPUC and its environmental consultant determined that it is appropriate to rely on the Federal Transit Administration (FTA)-published daytime hourly L_{eq} level of 90 dB to gauge whether significant impacts based on adverse community reaction could result (see Draft EIR, p. 4.13-19). The FTA's May 2006 *Transit Noise and Vibration Impact Assessment*, which is cited as the source of this threshold, explains that the results of a large number of social surveys about noise-related annoyance that had been synthesized by an internationally known acoustical scientist demonstrated "remarkable consistency" and suggests that the average results be taken as the best available prediction of such annoyance. The FTA reports that the synthesis "has received essentially unanimous acceptance by acoustical scientists and engineers." Although the synthesized surveys summarized in the FTA report specifically were about transit noise, sounds generated by transportation noise sources and by construction noise sources are sufficiently comparable to provide meaningful disclosure about the potential construction noise-related noise impacts of the Project.

- C-3.51 No nighttime operations-related variance is required to construct, operate, or maintain the Project. In fact, as indicated by the absence of such an approval in Table 1-1, *Summary of Potential Permit Requirements* (Draft EIR, p. 1-3 et seq.), it is assumed that such a variance would not be obtained. Mitigation Measure 4.13-5, by its terms, only would apply "In the event that nighttime construction activity is determined to be necessary within 1,000 feet of sensitive receptors." If SCE elects to implement Project construction only during daytime hours, then Mitigation Measure 4.13-5 would not apply. In any event, the analysis providing a basis for Mitigation Measure 4.13-5 has been revised to include a more direct discussion relative to existing ambient conditions. See Response A-1.147.
- C-3.52 Existing fire protection capacity and response ratios in the area are reflected in baseline conditions – no analysis of baseline conditions and no demonstration that acceptable

service ratios exist are required. Further, the relevant significance criterion states that “a project impact would be considered significant if it would...[r]esult in substantial adverse physical impacts associated with the provision of *new or physically altered governmental facilities*, need for new or physically altered governmental facilities, *the construction of which could cause significant environmental impacts*, in order to maintain acceptable service ratios, response times, or other performance objectives for [fire protection]” (Draft EIR Section 4.15.2, p. 4.15-8). As stated in Draft EIR Section 4.9, *Hazards and Hazardous Materials*, with implementation of mitigation measures, the Project would have a less-than-significant effect with respect to risk of fire in high and very high fire hazard zones. Therefore, the Project would not affect adopted performance objectives of the fire protection providers such that new or physically altered fire protection facilities would be required. Because no construction of new fire protection facilities and no alternation of existing fire protection facilities would be necessary to accommodate Project demands on such facilities and services, the Draft EIR correctly concludes that the Project would cause no impact with respect to this criterion.

C-3.53 Notifications of temporary closure of park and recreation facilities that identify nearby alternatives could result in increased use of those alternative locations. To clarify, the fact that the notices would identify alternatives would reduce potential impacts of the temporary closures on park users, not on park facilities. The impact of potential increased use at the identified alternative locations was determined to be insufficient to cause substantial physical deterioration of such facilities to occur or be accelerated; therefore, a less-than-significant impact related to such construction- or alteration-related activities. Accordingly, no additional mitigation measures were recommended in connection with potential impacts to recreation. Impact 4.16-1 on pages 4.16-7 and 4.16-8 of the Draft EIR has been revised in Response A-1.159 to clarify the conclusion that the Project would have a less-than-significant impact with respect to the potential substantial physical deterioration of recreational facilities due to increased use. Mitigation Measure 4.17-1 requires that the Applicant maintain pedestrian and bicycle access and circulation during Project construction where safe to do so and identify detours for bicycles and pedestrians, where applicable, in areas where this cannot safely be done. As described in Draft EIR Section 4.15 (as clarified), detours of recreational bicyclists or pedestrians to other routes would not result in substantial physical deterioration of recreational facilities.

C-3.54 As described on page 4.17-8 of the Draft EIR, the Project would be located throughout multiple jurisdictions and would require construction vehicles to utilize a variety of regional freeways and highways, as well as several local roadways, in order to access work sites. It is anticipated that the Project-generated traffic would be dispersed over several roadways within San Bernardino County and throughout the cities of Rialto, Fontana, and Rancho Cucamonga. Although construction traffic would be more noticeable on local roads identified in the Draft EIR, the increased traffic volumes would remain at levels less than the carrying capacity of those roads. Implementation of a traffic control plan described in Mitigation Measure 4.17-1 would reduce the impact of potential lane closures to a less-than-significant level. No data or references offering facts,

- reasonable assumptions based on facts, or expert opinion supported by facts is offered to support the suggestion that a more detailed lane closure or capacity discussion is recommended, or why the existing analysis is believed to be insufficient. Therefore, the CPUC cannot address in more detail the concern expressed in this comment.
- C-3.55 Mitigation Measure 4.17-1 states that SCE and/or its contractor shall prepare and implement a traffic control plan and coordinate development and implementation of the plan with San Bernardino County and the cities of Rialto, Fontana, and Rancho Cucamonga. The specific components to be included in the traffic control plan are listed in a detail list in the Draft EIR on pages 4.17-11 and 4.17-12. Because the traffic control plan must include at least those items and could include others at the discretion of the affected local jurisdictions, the Draft EIR provides considerable detail about the scope of actions that would and could be required to address potential impacts to support the conclusion reached, thus addressing the commenter's concerns about both how and why the potential impact would be addressed. Mitigation Measure 4.17-1 would become binding upon SCE and/or its contractor if it is adopted by the CPUC as part of its certification of the EIR and approval of the Project. As drafted, the mitigation measure is clear that the onus would be on SCE and/or its contractor to prepare and implement a traffic control plan that satisfies the requirements of the mitigation measure. As indicated in the Mitigation, Monitoring, Reporting, and Compliance Program included as Appendix H to this Final EIR, oversight and enforcement of the implementation of all final mitigation measures would be provided by the CPUC and/or its contractors. General comments about the legal requirements for adequate mitigation measures are noted.
- C-3.56 As noted in Section 4.7, *Geology and Soils*, on page 4.7-8 of the Draft EIR (under "Landslides"), the topography of the area is nearly flat. Therefore, the volume of cut and fill material necessary for construction of access roads is anticipated to be minor. No materials are anticipated to be hauled off-site in association with construction of new access roads; therefore, no truck trips would be required for such work. Because the Draft EIR is clear that no imported or exported fill material would be required, the commenter's characterization of cut and fill as "balanced on site" seems accurate.
- C-3.57 Section 2.9.15 of the Draft EIR (p. 2-38) discloses that construction-related water demand would be supplied by water brought to the site by water trucks and that no connection would be made to the local water supply system. As indicated by the references cited on Draft EIR page 2-46, the Project Description relies on information contained in the application and supporting materials, including the Proponents Environmental Assessment (PEA), that were submitted by SCE. PEA Table 3.6 (PEA, p. 3-51 et seq.) estimates the number of water trucks and durations of use for each construction component. The analysis of potential impacts associated with construction-related water use documented in the Draft EIR assumed a capacity of 4,000 gallons per truck; consequently, the maximum construction-related water consumption would be less than 4 acre-feet over the entire construction period. Revisions have been made to Draft

EIR Section 4.18 to clarify the rationale. The following is added after the second sentence of the first paragraph on page 4.18-9 of the Draft EIR:

Based on construction equipment information provided by the Applicant (SCE, 2010), the Project is conservatively estimated to require approximately 3.7 acre-feet of water throughout the construction phase. However, actual water use would likely be less because this estimate assumes that each day of water truck use would result in the use of the truck's full capacity (4,000 gallons), while actual use could be lower depending on the duration of construction, weather conditions, and other variables.

C-3.58 As described in Draft EIR Section 6.1, the cumulative effects analysis documented in the Draft EIR relies on a blend of the “summary of projections” approach and the “list-of-projects” approach. Planning document sources of relevant projections are identified on Draft EIR page 6-3 and include, for example, local agency General Plans. The cumulative projects identified in Table 6-1 (Draft EIR, p. 6-4 et seq.) and shown in Draft EIR Figure 6-1 (p. 6-2) resulting from the list-based approach include all of the projects within a 3-mile radius of the Project that were identified in response to inquiries made to local jurisdictions to identify the past, present and reasonably foreseeable future projects that would result in impacts that could overlap with those of the Project. Some projects within 3 miles of the proposed Project that were identified by the local jurisdictions were not included in the list of cumulative projects for the following reasons:

- a) The project was built-out, nearly built-out, or currently under construction such that construction-related impacts would not overlap.
- b) The permit for the project was expired or would expire before Project construction begins (in which case the project was determined not to be reasonably foreseeable).
- c) The project application was superseded by a later application for same project.
- d) The project would not contribute to cumulative effects to which the Project could also contribute. These include applications and approvals for parking yards, retail alcohol sales, signage, special events that would not overlap with Project construction, minor additions to existing structures and uses, redrawing lot lines, and use permits to recognize existing uses.

Regardless of whether a project was identified in one of the planning documents identified on Draft EIR page 6-3 and regardless of whether it was identified by a local agency as one that would cause impacts that could overlap with those of the Project, the commenter is correct that the geographic extent of the area relevant to possible cumulative effects varies on a resource-by-resource basis. That is why the resource-specific analysis of cumulative effects in the Draft EIR (p. 6-7 et seq.) identifies the boundaries of the relevant geographic scope on a resource-by-resource basis. Compare, for example, (i) the analysis of cumulative effects related to air quality (Draft EIR Section 6.2.3, p. 6-8 et seq.), which identifies the relevant area as the entire South Coast

Air Basin (SCAB) based on the South Coast Air Quality Management District's recommended methodology for analyzing cumulative effects within the SCAB, and (ii) the analysis of cumulative impacts related to hazards and hazardous materials (Draft EIR Section 6.2.9, p. 6-14 et seq.), which identifies separate and distinct geographic scopes as appropriate to evaluate cumulative effects depending on which pathway of exposure is at issue (relevant geographic scopes are identified as the air basin, watershed boundary, groundwater basin, or extent of affected soils). See also, e.g., Draft EIR Section 6.2.10, p. 6-15 ("The geographic context for the cumulative impacts associated with surface water hydrology and water quality is the Chino Watershed and the Middle Santa Ana River Watershed; with respect to groundwater, it would be the Chino and Rialto-Colton Subbasins of the Upper Santa Ana River Groundwater Basin."); Draft EIR Section 6.2.12, p. 6-16 ("The geographic scope of potential cumulative impacts related to [mineral resources] includes all areas in the region that would overlap geographically with an aggregate resource sector mapped by CGS."); Draft EIR Section 6.2.13, p. 6-17 ("Noise levels tend to diminish quickly with distance from a source; therefore, the geographic scope for cumulative impacts associated with noise would be limited to projects located within approximately 0.5 mile of the Project."); and Draft EIR Section 6.2.17, p. 6-19 ("The geographic scope of cumulative traffic impacts includes the local and regional roadways and highways that would be used for Project construction activities and for access by construction workers and vehicles.").

C-3.59 CEQA Guidelines section 15355 explains, "'Cumulative impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." The Summit at Rosena Specific Plan is considered among the reasonably foreseeable future projects in the cumulative scenario in light of the potential for its environmental impacts to combine with the impacts of the Project, resulting in a significant cumulative impact on the environment. The cumulative analysis does not consider the potential effects of the Project on the projects in the cumulative scenario.

C-3.60 As described in Response C-3.26, the Summit at Rosena project is discussed in the cumulative analysis in Draft EIR Chapter 6, and is included in the list of cumulative projects in Draft EIR Table 6-1 as cumulative project 3 (Draft EIR, p. 6-4). Cumulative impacts to visual resources are analyzed in Draft EIR Section 6.2.1 (p. 6-7 et seq.), which states: "The geographic scope of the cumulative effects analysis for visual resources consists of city-designated scenic corridors, major roadways, recreational areas, and other locations from which a viewer could see the Project along with views of other projects in the cumulative scenario. This geographic scope of cumulative impacts analysis was established based on the natural boundaries of the affected resource, i.e., potential shared viewsheds, and not on jurisdictional boundaries." As explained in Draft EIR Section 6.2.1, the incremental contribution of the proposed Project, in conjunction with impacts of the construction of the Summit at Rosena project, would result in a cumulatively considerable impact to scenic vistas along local scenic corridors and major roadways. Impacted viewer groups would include not only motorists, but also pedestrians

and bicyclists. For a discussion of the Project's impacts on private views from residential neighborhoods, see Response C-3.20.

C-3.61 Comment noted. Regarding enforceable mitigation measures, see Response C-3.55.

Mr. John Boccio
Falcon Ridge Substation Project

C/O ESA
225 Bush Street, Suite 1700
San Francisco, CA 94104

Dear Mr. Boccio

I am writing on behalf of The KTI Pipe Group of Companies, and Rialto Concrete Products. Rialto Concrete Products manufacturing plant and storage facilities are at the west end of Lowell Street in Rialto, and our property would be greatly impacted by the building of a 66kV subtransmission line as proposed in the DEIR page 3-11 section 3.4.1 Alternative 1: Lowell Street Realignment Alternative. We were just made aware of this potential route or we would have been in attendance at the public meeting held on February 16th.



C-4.1

First, any easement through our property would be a major problem and disruption to our day to day operations, and for future uses on the property, whether it is an expansion of our current manufacturing operation, subdivide, lease and/or sell the property. If the transmission lines were constructed under the current proposed plan we would lose significant value on our property values in the event we ever decided to sell the land for future development. We currently hold one of the largest tracts of land in the Rialto area and is considered prime property for development of large industrial warehouses in excess of 300,000 square feet. We have received offers by developers in excess of \$16,500,000 for our property for construction of such a facility. The proposed utilities lines would significantly impact this value.



C-4.2

Second, the proposed path as it goes west on the south side of Lowell Street would effectively cut through our property and leave us with a 9.5 acre parcel on the south side of the proposed line and 12 acre parcel to the north of the proposed line. Our operations require every inch of land currently in use. We believe the current proposed plan would be better routed by using existing easements located on our easterly property line which starts near the end of the Lowell Street cul-de-sac and runs south to Summit Ave (See attached map). There would be less disruption to our operations and would provide SCE with the required space for the overhead towers. We believe there may be some errors on the mapping of the route and the description of the route in the City of Rialto's plan and some unknown easements that already exist that may serve the project better.



C-4.3

Third, if the line were to be overhead it would impact our ability to use mobile cranes, which are essential in our manufacturing process. We regularly require 40- 60' of overhead clearance when using cranes. Overhead power lines would significantly impact our ability to manufacture our products and would cause a major financial burden on our operations.



C-4.4

Fourth, if the proposed line were constructed underground, then the line would be subjected to continually equipment and inventory traffic with weights in excess of 160,000 pounds. Lastly, the proposed line would cause a financial disruption to our operations during the construction phase as this may impact our ability to ship products to our customers in a timely manner.



C-4.5

C-4.6

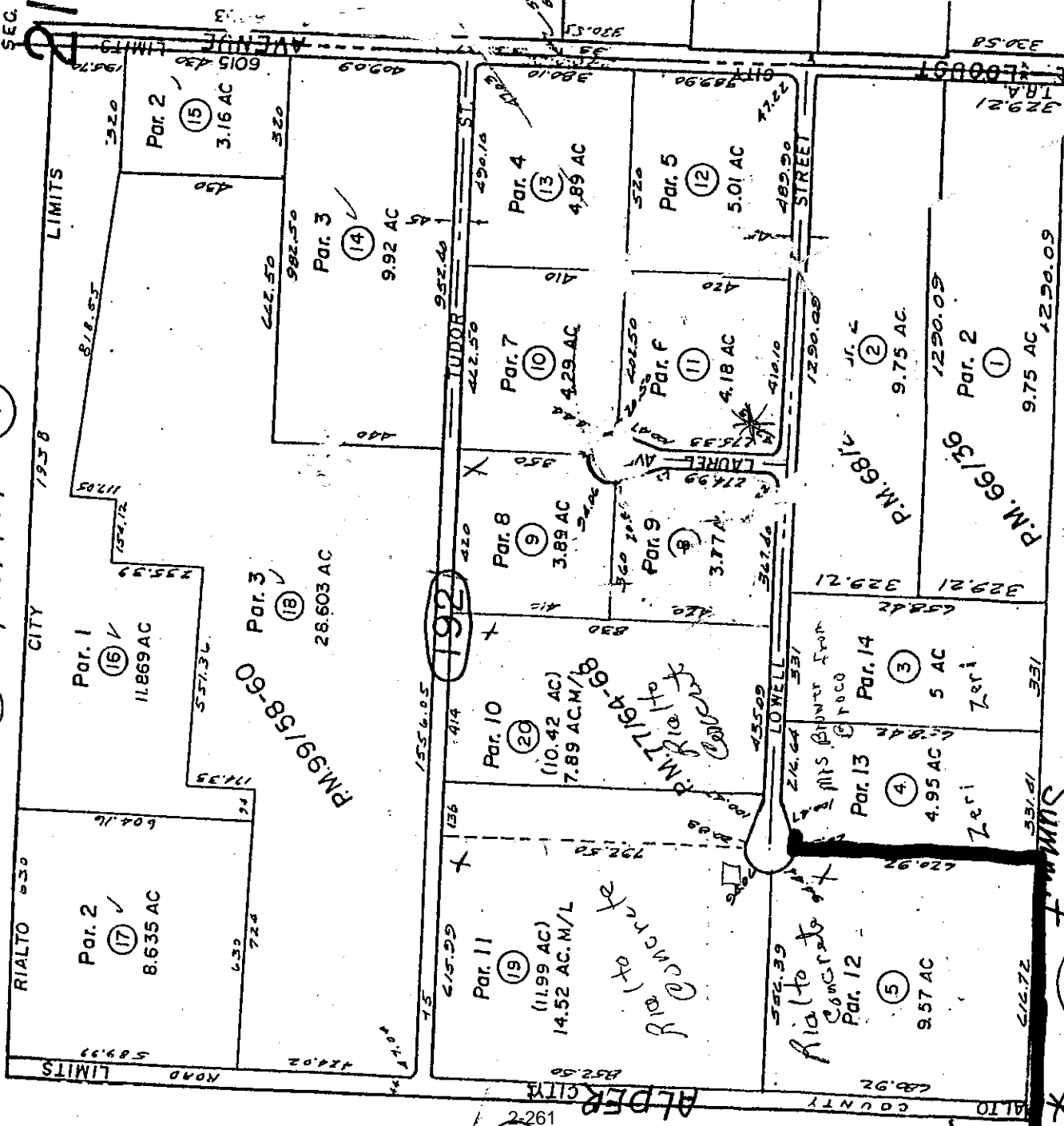
In closing, we are firmly opposed to the alternative plan and believe that after your review of the attached drawing of our facility that you will agree with our position. Cutting our property in half is not in anyone's best interest. We stand ready to meet with you to discuss in more detail, how your proposed route would impact our business and our 100+ employees that depend on our company for their livelihood.

┌
C-4.7
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Sincerely

Jerry Cowden

56 North 17



Par. Govt. Lot 3

Believe there is confusion
Between Maps and
Description of Line
in City of Rialto
Proposal.

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16

30

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1133/01

1133/02

1133/03

2.6.12 Letter C-4 – Responses to Comments from The KTI Group

- C-4.1 As described in Draft EIR, Appendix A, *Scoping Report*, on page A-22, “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.” Economic considerations, including property value impacts, are outside the scope of the EIR. However, the CPUC will take into account economic and other non-environmental considerations when it considers whether to approve SCE’s application for the Project. See also, MR1 regarding Alternative 1.
- C-4.2 As described in Draft EIR, Appendix A, *Scoping Report*, on page A-22, “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.” Economic considerations, including the introduction of financial and operational constraints to existing businesses that may result from approval of the Project, are outside the scope of the EIR. See, for example, CEQA Guidelines section 15064(e) and related case law (*Santa Monica Chamber of Commerce v. City of Santa Monica* (2002) 101 Cal.App. 4th 786, 799; *Friends of Davis v. City of Davis* (2000) 83 Cal.App.4th 1004, 1019), which instruct that adverse economic effects on a few persons or businesses is not cognizable harm under CEQA. Nonetheless, as noted in Response C-4.1, the CPUC will consider economic and other non-environmental considerations in its decision-making process for the Project. See also, MR1 regarding Alternative 1.
- C-4.3 The route of Alternative 1 was determined in consultation with the City of Rialto. See Comment B-6.3, which states, “The City of Rialto proposed a project alternative utilizing existing infrastructure. The alternative is listed in the DEIR as the environmentally superior project alternative.” The proposed alteration of this route would not provide substantial environmental benefits relative to Alternative 1 or the other alternatives analyzed in the Draft EIR. Accordingly, the Draft EIR has not been supplemented to include analysis of the potential environmental impacts of the proposed shift in the Alternative 1 alignment.
- C-4.4 See Response C-4.2.
- C-4.5 The purpose of an EIR is to identify the significant effects of a project on the environment, not effects of the environment on the project (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473). Therefore, CEQA does not take into account whether the continuation of baseline operations on the site of Alternative 1 would cause harm to Project infrastructure.
- C-4.6 See Response C-4.2.
- C-4.7 Opposition to Alternative 1 is noted. Concerning division of the property and effects on the existing business (including its employees), see Response C-4.2.

***Summary of Oral Comments Received at the CEQA Public Comment Meeting
for the Draft EIR Issued for Southern California Edison's Proposed Falcon Ridge
Substation Project
February 16, 2012***

Commenter No. 1: Oswald Realegeno

Summary of Comments: Mr. Realegeno lives on Coralwood Place in Fontana in the vicinity of Sierra and Citrus. His property line is about 300 feet south of an existing power line. The proposed power line would be even closer than the existing line to his home. Electromagnetic Field (EMF) emissions measurements were not included in the EIR. Mr. Realegeno is an electrician and has used a meter to read EMF levels on his property; he says that the readings are above those allowed by the EPA. Mr. Realegeno is concerned that EMF exposure can cause cancer and other sicknesses, and notes that his next door neighbor's daughter, 7 years old, was diagnosed with leukemia last year after living in the house for about 4 years. Their house was closer by about 20 feet to existing power lines than Mr. Realegeno's house. He is concerned that building a new power line behind his house will increase the EMF exposure at the house. Mr. Realegeno is concerned about his two young daughters, and says that from time to time his daughter's hair stands on end, which he believes is due to the power lines. Mr. Realegeno requests that the power lines be placed further from houses.

D-1.1

2.6.13 Letter D-1 – Responses to Comments from Oswald Realegeno

D-1.1 Please see Response C-3.5. There are currently no defined or adopted CEQA standards for defining health risk from EMF. The Draft EIR does not provide significance determinations related to EMF; however, as described on Draft EIR page 1-7, information is presented about EMF for the benefit of the public and decision makers. The Draft EIR discloses that EMF is classified as a possible carcinogen. Appendix B of the Draft EIR, *SCE's EMF Field Management Plan*, quantitatively estimates EMF that would be generated by the Project and describes the measures SCE would implement, in compliance with CPUC requirements, to reduce EMF from this Project. Field reduction measures to be implemented by SCE along that portion of the subtransmission line in the vicinity of Coralwood Place are described under "Segment 4-Etiwanda Source Line," beginning on page B-39 of Draft EIR Appendix B. These measures include utilizing structure heights that meet or exceed established design criteria and arranging phase conductors for field reduction.

***Summary of Oral Comments Received at the CEQA Public Comment Meeting
for the Draft EIR Issued for Southern California Edison’s Proposed Falcon Ridge
Substation Project
February 16, 2012***

Commenter No. 2: John Hogan, Hall & Foreman, Inc. for Intex Properties

Summary of Comments: Mr. Hogan commented on behalf of Intex Properties, which owns land within the Westgate Specific Plan area of Fontana, through which the subtransmission line would cross north of Baseline Avenue. The property is on S. Highland west of San Sevaine Road and is currently vacant but is planned for development. Intex would prefer that the subtransmission line cross parallel and adjacent to the Caltrans right-of-way, toward the back of Intex’s property rather than along the street. Intex would be amenable to granting SCE an easement on its property to achieve this. This would improve the visual quality of the property by going on the back of the property, and would improve safety by locating poles away from the road. Mr. Hogan also recommended that SCE underground a portion of this route.

┌
└ D-2.1

2.6.14 Letter D-2 – Responses to Comments from John Hogan, Hall & Foreman, Inc.

- D-2.1 See MR2 for discussion of the alternative subtransmission line route proposed by the commenter. See also MR3(C) for discussion of undergrounding of the subtransmission line at specific locations.

***Summary of Oral Comments Received at the CEQA Public Comment Meeting
for the Draft EIR Issued for Southern California Edison’s Proposed Falcon Ridge
Substation Project
February 16, 2012***

Commenter No. 3: Greg Lanz, City of Rialto

Summary of Comment: Mr. Lanz commented that the City of Rialto would prefer that the subtransmission line in the vicinity of Rialto run up Locust rather than the routes proposed. Alternative 1 would be within the Casmalia corridor which is a visual corridor for the City of Rialto, and would be within a new specific plan area. The City of Rialto proposes that the line be undergrounded in this area, but understands that this would be expensive, so proposes that the line could collocate with existing power lines on Locust Avenue.

| D-3.1
|
| D-3.2
|

2.6.15 Letter D-3 – Responses to Comments from Greg Lanz, City of Rialto

D-3.1 The comment expresses support for an alternative in which the proposed subtransmission source line in the City of Rialto follows Locust Avenue rather than Casmalia Avenue. Draft EIR Chapter 3, *Alternatives Analysis*, describes the route of Alternative 1, which would follow Locust Avenue rather than Casmalia Avenue (Draft EIR, p. 3-1 et seq.). The City’s preference for an alternative with a subtransmission source line route like Alternative 1’s is noted. For a discussion of Alternative 1 and its feasibility as the environmentally superior alternative, see MR1.

Regarding the comment’s characterization of the “Casmalia corridor” as a “visual corridor,” see Response B-6.1.

The location of the Project and alternatives relative to specific plan areas and other City of Rialto General Plan designations are shown in Draft EIR Figure 4.11-1 (p. 4.11-3). Draft EIR page 4.11-6 discloses that the Renaissance Specific Plan area would be traversed by the proposed subtransmission source line segment, which “would be located along the northern border of the specific plan where it parallels West Casmalia Avenue. The land in this portion of the specific plan area is designated Freeway Incubator, which accommodates larger retail and business uses that serve the region based on its proximity to the freeway. The subtransmission line would then cross [the freeway] at Locust Avenue and terminate at the existing Alder Substation. This land is designated Utilities/Public Facilities, which is a designation specific to the existing utility infrastructure in the planning area, including the Alder Substation. Both of these land use designations allow utilities as a permitted use.” As shown in the Renaissance Specific Plan Conceptual Map (City of Rialto, 2010),²⁶ this specific plan area was designed around the existing Alder Substation.

D-3.2 For a discussion of undergrounding and the City’s development standards, see MR3(A). Regarding possible collocation along Locust Avenue, see the description of Alternative 1 in Draft EIR Section 3.4.1 (p. 3-11), as clarified by the Applicant in its comments and shown in Chapter 3 of this FEIR: If Alternative 1 were approved, the line would be collocated with existing lines on Locust Avenue.

²⁶ City of Rialto, 2010. Renaissance Specific Plan Conceptual Map. Available online: http://www.ci.rialto.ca.us/documents/downloads/Conceptual_Map.pdf (April 14, 2010).

***Summary of Oral Comments Received at the CEQA Public Comment Meeting
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Substation Project
February 16, 2012***

Commenter No. 4: Charles Fahie, City of Fontana Planning Division

Summary of Comment: Mr. Fahie commented that the City’s concern is aesthetic impacts. The City has had meetings with SCE to discuss design features of the Project. These meetings have been productive, and the City feels that they can have a resolution on the aesthetics of the substation. Mr. Fahie noted that the Planning Division disagrees with the aesthetics finding in the EIR because the City wants to preserve viewsheds for planned homes in the areas where the subtransmission lines would be located. The General Plan for the city emphasizes views of the San Gabriel Mountains, and the EIR should look at mitigation measures reduce impacts to views of the mountains. There would be significant, unavoidable impacts to aesthetics in the area where the line would deviate from the SCE corridor and cross I-10. Also, the subtransmission line would be placed in between existing lines and would impact the views between them. Mitigation measures proposed in the EIR for the subtransmission lines would not mitigate effects on views of mountains; the EIR should look at more types of mitigation. The City wants SCE to underground the portion of the line that would cross I-10 and has not seen a cost estimate for this option. Citrus, Sierra, and Baseline are areas that are significant to Fontana residents and lines should be undergrounded here. The EIR emphasizes the views from the perspective of a driver on the freeway, but Fontana is trying to become a more walkable city, so impacts should be assessed to views for pedestrians, from trails and paseos. These are not described in the EIR and need additional mitigation measures. The City of Fontana Planning Division will submit additional comments.

D-4.1

D-4.2

D-4.3

D-4.4

2.6.16 Letter D-4 – Responses to Comments from Charles Fahie, City of Fontana

D-4.1 Comment noted.

D-4.2 The desire to preserve existing views for planned homes is understandable; however, under CEQA, lead agencies are charged with evaluating the changes to existing baseline conditions that would result from the approval of a proposed project or project alternative. This is explained on Draft EIR page 4-2. Following a supplemental scoping meeting between the CPUC and the City of Fontana, the City submitted a letter on May 27, 2011, that provides excerpts from the City's General Plan Community Design Element regarding open space views and the incorporation of scenic view corridors into the City's design guidelines. Graphics provided in the letter emphasize the scenic views and are not oriented along the existing alignments of power lines and towers. The CPUC considered these perspectives as well as others when analyzing the potential aesthetic effects of the Project and alternatives. See, for example, Photos A through H (Draft EIR, pp. 4.1-4 and 4.1-5). City of Fontana General Plan goals and policies prioritizing the preservation of view corridors are set forth on Draft EIR page 4.1-13.

Regarding the comment that the EIR should look at mitigation measures to reduce impacts to views of the San Gabriel Mountains, see Response B-5.1. The Draft EIR concurs with the comment that there would be significant and unavoidable impacts to aesthetics in the area where the line would deviate from the SCE corridor, and discusses this impact starting with the bottom paragraph on page 4.1-28. See also MR2 for discussion of a proposed alternate route for the subtransmission line at this location.

The comment states that the subtransmission line would be placed in between existing lines and would impact the views between them. For a discussion of how existing industrial infrastructure influences the environmental setting and subsequent impact analysis, see Response C-3.24.

D-4.3 For a discussion of undergrounding of the proposed subtransmission line at key view corridors, including along South Highland Avenue and San Sevaine Road, see MR3(B). See also MR2 for discussion of a proposed alternate route at this location.

D-4.4 Regarding impacts to pedestrians and from trails, the commenter is referred to Response B-5.2.

CHAPTER 3

Revisions to the Draft EIR

3.1 Introduction

Pursuant to CEQA Guidelines Section 15132, this section presents changes to the Draft EIR that were initiated by the Lead Agency or were made in response to comments. Such changes are insignificant as the term is used in CEQA Guidelines Section 15088.5(b), in that they merely clarify or amplify the text or make insignificant modifications to it.

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.

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.

3.2 Text Changes

Page **Identification / Text Change**

Executive Summary

ES-2 *The seventh bullet is revised as follows in response to comment A-1.10:*

- Serving long-term projected electrical demand requirements in the Electrical Needs Area beginning in 2014;²

ES-4 *The first sentence of the second paragraph is revised as follows in response to comment A-1.11:*

SCE proposes to construct, operate, and maintain a 66/12 kV unattended, automated, 56 megavolt-ampere (MVA) low-profile substation (the Falcon Ridge Substation) on an approximately 2.7 acres of an approximately 7.5-acre parcel located just south of Casa Grande Avenue, east of Sierra Avenue, north of Summit Avenue and adjacent to SCE's existing transmission ROW, in the City of Fontana, California.

ES-4 *The third sentence of the second paragraph is revised as follows in response to comment A-1.12:*

In addition to the proposed substation, the Project would include the installation of two subtransmission source line segments; construction of ~~three new~~ five new ~~underground vaults, which also are referred to as~~ distribution getaways; telecommunications (fiber-optic) infrastructure work; and upgrades to existing optical communications equipment at Etiwanda, Alder, and Randall Substations.

ES-4 *The second sentence of the third paragraph is revised as follows in response to comment A-1.13:*

One segment would be approximately 3 miles in length to form the new Alder ~~66~~ 44.5 kV Subtransmission Source Line; the other would be approximately 9 miles in length to form the new Etiwanda 66 kV Subtransmission Source Line.

ES-4 *The first sentence of the fourth paragraph is revised as follows in response to comment A-1.12:*

Construction of ~~three~~ five underground 12 kV distribution “getaways.” ~~Three~~ Five new underground vaults, located outside the substation walls on either the SCE substation property, private property, or in franchise.

ES-4 *The second sentence of the fifth paragraph is revised as follows in response to comment A-1.14:*

At ultimate build out, the Falcon Ridge Substation could accommodate sixteen ~~separate~~ 16 12 kV distribution circuits.

ES-4 *The first sentence of the fifth paragraph is revised as follows in response to comment A-1.15:*

Within the substation site, distribution circuits would be placed in an underground conduit system, also known as a “distribution getaway.” A distribution getaway consists of multiple vaults connected by one or more conduit systems (a conduit is also sometimes referred to as a duct).

ES-5 *The second sentence under “Applicant Proposed Measures” is revised as follows in response to comment A-1.16:*

These measures relate to ~~aesthetics,~~ biological resources, and paleontological resources.

ES-5 *The last sentence under “APM-BIO-01” is revised as follows in response to comment A-1.17:*

~~APM-BIO-02: Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Sage Scrub, and Annual Grassland/Disturbed Riversidean Alluvial Fan Sage Scrub Project impacts on sage scrub vegetation.~~

- ES-6** *The following is added after the last sentence under “APM-BIO-02” on page ES-6 of the Draft EIR in response to comment A-1.18:*

In lieu of developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition, and habitat types present are comparable to impacted habitat at the proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable, local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

- ES-7** *The “No Project Alternative” is revised as follows in response to comment A-1.19:*

Under the No Project Alternative, no action would be taken. The proposed substation site would continue to be ~~undeveloped used for agriculture~~ unless and until some other use was approved (consistent with applicable land use regulations and in accordance with available infrastructure and community services). The existing electric power infrastructure (~~including the Nuevo Substation, temporary Model Pole Top Substation, subtransmission and telecommunications facilities~~) would remain in place, serving the Electrical Needs Area with decreasing reliability as the electrical demands of growing area communities increase. The projected energy demand in this area is expected to exceed the combined energy capacity of the existing substations in the ~~2013-2014~~ timeframe.

The analysis of the No Project Alternative in this document focuses on a no-development/no Project scenario where the existing ~~undeveloped agricultural~~ use is continued. With a no-development scenario, the proposed substation site would continue ~~to be undeveloped in agricultural use~~ and the existing environmental setting would be maintained. Changes to that setting, including changes to the landscape (aesthetics, habitat, and land use/~~agriculture~~); construction-related noise, traffic, and air and greenhouse gas emissions would not occur. Available ~~irrigation infrastructure would remain in place, and~~ public services and utilities would continue to be provided or available to the site as they are now.

- ES-7** *The last sentence under “Alternative 1” is revised as follows in response to comment A-1.20:*

Approximately 12 ~~Three~~ tubular steel poles (TSPs) would be required, ~~one at each of the proposed corners.~~ Approximately 76 light weight steel (LWS) ~~Wood~~ poles and 6 wood/LWS ~~guy~~ poles would be installed along ~~the extension of~~ Summit Avenue, Mango Avenue, North Alder Street, Lowell Street, and along Locust Avenue.

ES-11 *Table ES-1, Summary of Impacts and Mitigation Measures for the Project, is revised as follows to reflect revisions to the applicable environmental resource sections:*

**TABLE ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROJECT**

Impact	Impact Class	Mitigation Measure(s)	Residual Impact
3. Air Quality			
Impact 4.3-1: Project construction activities would generate NOx and PM10 emissions that could contribute substantially to violations of ozone and PM10 air quality standards.	Class I	<p>Mitigation Measure 4.3-1a: For diesel-fueled off-road construction equipment of more than 50 horsepower and on-road diesel-fueled vehicles, SCE shall <u>make a good faith effort to use available construction equipment that meets the highest USEPA-certified tiered emission standards ensure achievement of a Project-wide fleet average 20 percent NO_x reduction and 45 percent PM10 exhaust reduction compared to the most recent CARB fleet average.</u> An Exhaust Emissions Control Plan to achieve that identifies each unit's certified tier specification, Best Available Control Technology (BACT), and the CARB or SCAQMD operating permit number (if applicable) these reductions 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. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as such become available. For all pieces of equipment that would not meet Tier 3 emission standards, the Exhaust Emissions Control Plan shall include documentation from 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.</p> <p>Mitigation Measure 4.3-1b: SCE and/or its contractors shall develop a Fugitive Dust Control Plan that specifically describes how compliance with each of SCAQMD Rule 403 Best Available Control Measures (BACMs) shall be achieved. If it is determined that any of the BACMs are not applicable to construction of the Project, the plan shall present rationale as to why the BACMs are not applicable and would not be implemented. This plan shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities, and the approved plan shall be distributed to all employees and construction contractors working on the Project.</p>	Significant Unavoidable
4. Biological Resources			
Impact 4.4-1: Construction activities could result in adverse impacts to special-status plant species.	Class III	<p>Mitigation Measure 4.4-1: Where avoidance of Riversidean sage scrub habitat is not possible, SCE shall compensate for losses through habitat creation and enhancement, and long-term preservation for temporary and permanent impacts by implementing the following measures:</p> <ul style="list-style-type: none"> SCE shall establish buffer zones and mitigate for the loss of special-status plant species and sensitive plant communities. SCE and their contractors shall avoid and minimize impacts to special-status plant species and sensitive plant 	Less than Significant

TABLE ES-1 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROJECT

Impact	Impact Class	Mitigation Measure(s)	Residual Impact
4. Biological Resources			
Impact 4.4-1 (cont.)		<p>communities to the maximum extent feasible. Avoidance will be carried out by establishing a visible buffer zone around sensitive areas prior to construction in coordination with a qualified biologist, redesigning or relocating proposed disturbance areas, locating staging areas within disturbed areas when possible, or using other measures recommended by the CNPS (1998).</p> <ul style="list-style-type: none"> • SCE shall mitigate for Riversidean sage scrub vegetation losses at a minimum replacement ratio of 1:1. Residual temporary impacts on <u>disturbed mule fat scrub and</u> undisturbed/disturbed Riversidean sage scrub shall be restored on site and/or mitigated at a replacement ratio of 1:1. Permanent impacts on undisturbed Riversidean sage scrub shall be mitigated at a replacement ratio of up to 3:1. Final compensation ratios for impacts to Riversidean sage scrub shall be determined in consultation with the USFWS and CDFG. • As a component of the Program, SCE shall develop and implement a five-year restoration mitigation and monitoring program. The Program will be described in a Restoration Plan that shall be subject to approval by the USFWS, CDFG, and the CPUC. The Restoration Plan shall include: <ul style="list-style-type: none"> - detailed design drawings and specifications for the mitigation site(s), including site drawings, final grade elevations, an appropriately spaced planting plan, a plant species list showing the number of each plant species, and notes on proper site preparation (including temporary erosion and sediment control); - a discussion of ongoing maintenance practices to protect the mitigation site, including a minimum 5-year performance monitoring program with specific, measurable performance standards to evaluate mitigation success; - a contingency plan indicating actions and corrective measures to be taken if monitoring indicates performance standards are not being met; - a statement of financial assurance that the mitigation will be constructed, maintained, monitored, and contingencies implemented, if necessary; and - a plan for restoring temporarily disturbed areas. • SCE shall submit an annual vegetation monitoring report to the USFWS, CDFG, CPUC to document site compliance, advise of remedial actions that were undertaken during the previous monitoring year, and advise of restoration site management needs for the coming year. Reports shall be required for a minimum of five years following initial site restoration to document progress of mitigation areas toward attaining the minimum performance standards. • SCE shall revegetate all natural areas temporarily disturbed by project activities. Revegetation criteria will include general restoration concepts and methods, including the use of locally native plants, protection and restoration of soil 	

**TABLE ES-1 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROJECT**

Impact	Impact Class	Mitigation Measure(s)	Residual Impact
4. Biological Resources			
Impact 4.4-1 (cont.)		<p>conditions, and control of aggressive non-native plant species. The planting effort shall commence in the fall following completion of construction at a given site. If the project is expected to have an extended construction timeline, revegetation shall be completed as extensively as possible during each fall season. Interim revegetation by hydroseeding or with a seeding mixture and mulch using broadcast methods shall be implemented as necessary to control erosion in disturbed areas prior to final revegetation. The plant palette will include locally native plants such as California buckwheat, black sage, white sage, cane cholla, and California sagebrush.</p> <p><u>As an alternative to developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.</u></p>	
Impact 4.4-2: Construction activities associated with the Project could result in adverse impacts to Los Angeles pocket mouse and other non-listed special-status wildlife species.	Class II	<p>Mitigation Measure 4.4-2: SCE and/or its contractors shall avoid impacts to occupied Los Angeles pocket mouse habitat to the maximum extent feasible in the final Project design. SCE shall define Los Angeles pocket mouse habitat as “off limits” in construction plans and specifications. <u>If complete avoidance is not feasible, mitigation measures shall be implemented to reduce potential project impacts within occupied habitat to the maximum extent feasible. Such measures could include minimizing that portion of the project footprint that could encroach on an occupied habitat area and staging materials and work so as not to encroach into such an area.</u> The presence of a Biological Monitor during Project construction shall be required to would further ensure that any potential impacts to special-status wildlife species are avoided and minimized. <u>For those impacts that cannot feasibly be avoided or further minimized, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.</u></p>	Less than Significant
Impact 4.4-4: Operation of new transmission lines could impact raptors as a result of electrocution or collision.	Class II	<p>Mitigation Measure 4.4-4: SCE shall follow Avian Power Line Interaction Committee guidelines for avian protection on powerlines. SCE shall use current guidelines to reduce bird mortality from interactions with powerlines. The Avian Power Line Interaction Committee (APLIC, 2006) and USFWS recommend the following:</p> <ul style="list-style-type: none"> • Provide 60-inch minimum horizontal separation between energized conductors or energized conductors and grounded hardware; 	Less than Significant

TABLE ES-1 (Continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE PROJECT

Impact	Impact Class	Mitigation Measure(s)	Residual Impact
4. Biological Resources			
Impact 4.4-4 (cont.)		<ul style="list-style-type: none"> • Insulate hardware or conductors against simultaneous contact if adequate spacing is not possible; <u>and</u> • Use pole designs that minimize impacts to birds; and, • Shield wires to minimize the effects from bird collisions. 	
5. Cultural Resources			
Impact 4.5-3: Project construction could result in damage to previously unidentified human remains.	Class II	<p>Mitigation Measure 4.5-3: If human remains are uncovered during Project construction, SCE and/or its contractors shall immediately halt all work, <u>in the immediate vicinity, and SCE's archaeologist or cultural resources consultant shall</u> contact the county coroner to evaluate the remains, and <u>shall</u> follow the procedures and protocols set forth in CEQA Guidelines §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 Health and Safety Code §7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 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 the SCE <u>archaeologist</u> and/or its <u>cultural resources</u> contractor has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely descendents regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.</p>	Less than Significant

Introduction

1-3 Table 1-1 is revised as follows in response to comment A-1.26:

Permits and Other Requirements	Agency	Jurisdiction/Purpose
Federal		
Nationwide or Individual Permit (Section 404 of the Clean Water Act)	United States Army Corps of Engineers (Corps)	Construction impacting Waters of the United States, including wetlands
Notification and approval request for use of construction cranes	Federal Aviation Administration	Use of objects greater in height than the distance from the closest runway divided by 100, to a distance of 20,000 feet, including along most of the Alder Subtransmission Source Line Route.
State		
Permit to Construct	California Public Utilities Commission	Overall project approval and California Environmental Quality Act review
Encroachment Permit Permit for Oversize Loads	California Department of Transportation, District 8	Caltrans has the discretionary authority to issue special permits for the movement of vehicles/loads exceeding statutory limitations on the size, weight, and loading of vehicles contained in Division 15 of the California Vehicle Code. Caltrans also has discretionary authority to issue encroachment permits for the use of California State highways for purposes other than normal transportation, including construction, operation and maintenance activities within, under or over a state highway right-of way.
Aerial Utility Crossing Permit	San Bernardino County Flood Control District (SBCFCD)	Aerial crossings of flood control and storm drain facilities.
Wire Line Crossing Permit	Burlington Northern Santa Fe (BNSF) Railway	Per CPUC General Order No. 95, consent must be obtained from rail line owners for supply and communication line crossings.
Section 7 Consultation	California Department of Fish and Game	Construction, operation, and maintenance activities that may affect a state-listed species or its habitat; incidental take authorization (if required)
<u>Streambed Alteration Agreement (1600)</u>	<u>California Department of Fish and Game</u>	<u>Construction, operation, and maintenance activities that may modify the bed, bank, or channels of any streambeds.</u>
Regional and Local		
National Pollutant Discharge Elimination System Construction General Stormwater Permit	Santa Ana California Regional Water Quality Control Board (RWQCB)	Stormwater discharges associated with construction activities disturbing more than 1 acre of land
Section 401 Water Quality Certification (or waiver)	RWQCB	Certifies that project is consistent with state water quality standards
Encroachment Permit (ministerial)	San Bernardino County City of Rialto City of Rancho Cucamonga City of Fontana	Construction, operation, and maintenance within, under, or over city road ROW ¹
Permits and Other Requirements	Agency	Jurisdiction/Purpose
Traffic Control Permit	City of Fontana	Temporary lane closures
Lane Closure Permit	City of Rancho Cucamonga	Temporary lane closures

Permits and Other Requirements	Agency	Jurisdiction/Purpose
<u>Ministerial Grading Permit/SWPPP</u>	County of San Bernardino City of Rialto City of Rancho Cucamonga City of Fontana	San Bernardino County: before a project may undertake excavation greater than two feet in depth or a fill one foot or more in thickness Rialto: before a project may move more than 50 cubic yards of earth Rancho Cucamonga: before a project may do any grading Fontana: before a project may cut or fill soil to a depth of more than 12 inches to support a structure
<u>Aerial Utility Crossing Permit</u>	<u>San Bernardino County Flood Control District (SBCFCD)</u>	<u>Aerial crossings of flood control and storm drain facilities.</u>
<u>Encroachment Permit or Agreement</u>	<u>Southern California Regional Rail Authority (SCARRA)</u>	<u>Per CPUC General Order No. 95, consent must be obtained from rail line owners for supply and communication line crossings.</u>
<u>Spill Prevention, Control, and Countermeasure (SPCC) Plan</u>	<u>San Bernardino County Fire Department</u>	<u>For storage of mineral oil in an aboveground tank with a capacity greater than 1,320 gallons.</u>

¹ Encroachment permits for San Bernardino County and the City of Rialto include traffic control and temporary lane closures.

SOURCES: SCE, 2010a; SBCFCD, 2011; BNSF, 2010; San Bernardino County, 2011; City of Fontana, 2011; City of Rancho Cucamonga, 2011; City of Rancho Cucamonga, 2010; SBCFD, 2011

Project Description

2-1 *The fifth and sixth sentences of the second paragraph are revised as follows in response to comment B-5.4.*

The new 66 kV subtransmission line would leave Alder Substation and parallel West Casmalia Street until it reaches the boundary line of the City of Fontana and the City of Rialto Mango Avenue. The subtransmission line would then traverse north to intercept and follow along the future extension of Mango Avenue until it reaches the Falcon Ridge Substation.

2-3 *The first two complete sentences are revised as follows in response to comment A-1.28:*

The 66 kV subtransmission facilities would then again extend northeast within SCE's existing transmission ROW to a point until it intersects with approximately 0.25 mile north of Summit Avenue. The 66 kV subtransmission facilities would then extend east primarily on SCE's existing transmission ROW until it reaches the Falcon Ridge Substation.

2-4 *The seventh sentence under "Falcon Ridge Substation" is revised as follows in response to comment A-1.29:*

The Falcon Ridge Substation would include a 66 kV switchrack, a 66 kV Circuit Breakers and Disconnect Switches, two 28 MVA, 66/12 kV Transformers, one

12 kV Switchrack, capacitor banks, a Mechanical and Electrical Equipment Room (MEER), distribution getaways, a restroom facility, an asphalt concrete access road, lighting, perimeter walls, gates, and drainage.

- 2-4** *The first two sentences under “66 kV Switchrack” are revised as follows in response to comment A-1.30:*

One steel 66kV switchrack, up to 196 ~~154~~ feet long by 82 feet wide by 25 feet high would be installed. The switchrack would consist of eight 22 ~~18~~-foot-wide positions (e.g., two for subtransmission source lines, two for transformer banks, one for a bus-tie between the operating and transfer buses; and three vacant for future use).

- 2-5** *Figure 2-2, Project, is revised in response to comment A-1.31. Although access roads are depicted on multiple figures in the Draft EIR, revisions in response to this comment are only shown in this revised figure and in revised Figure 3-1, Alternative 1: Lowell Street Realignment Alternative. Additional revisions to Figure 3-1 are shown in response to comment A-1.74.*

- 2-6** *Figure 2-3, Substation Layout, is revised in response to comment A-1.32.*

- 2-7** *The first sentence is revised as follows in response to comment A-1.33:*

Each operating and transfer bus would be 196 ~~144~~ feet long and consist of two 1,590 kcmil (thousand circular mills) Aluminum Conductor Steel Reinforced (ACSR) for each of the three electrical phases.

- 2-7** *The last sentence is revised as follows in response to comment A-1.34:*

The MEER dimensions would be approximately 36 feet long by 15 ~~20~~ feet wide by 11 feet tall.

- 2-8** *The following is added after the last sentence of the first paragraph in response to comment A-1.35:*

Additionally, another potential option includes a permanent restroom equipped with a self-contained waste disposal system installed within the substation perimeter near the entry gate.

- 2-8** *The first sentence of the third paragraph is revised as follows in response to comment A-1.12:*

The initial distribution getaways would consist of three ~~five~~ new underground vaults.

- 2-8** *The second sentence of the fifth paragraph is revised as follows in response to comment A-1.14:*

At ultimate build out, the Falcon Ridge Substation could accommodate sixteen separate 16-12 kV distribution circuits.

- 2-8** *The following is added after the last sentence in response to comment A-1.37:*

Supplemental CEQA analysis may be required before these circuits are constructed, operated and maintained in the future; however, under General Order No. 131-D, the future 12 kV distribution circuits would not be subject to additional CEQA analysis by the Commission.

- 2-10** *The last two sentences of the third paragraph are revised as follows in response to comment A-1.38:*

Prior to commencement of the substation construction, SCE would consult with the City of Fontana to develop an appropriate landscaping plan and perimeter wall design that would be submitted with the ministerial grading permit application for the Project. The landscaping plan, to the extent practicable, would be consistent with Fontana Ordinance 1625, Landscaping and Water Conservation.

- 2-12** *The third and fourth complete sentences are revised as follows in response to comment A-1.41:*

The 66 kV subtransmission line would then again extend northeast within SCE's existing transmission ROW, to a point approximately 0.25 mile north of until it intersects with Summit Avenue. The 66 kV subtransmission line would then extend east primarily on SCE's existing transmission ROW until it reaches the substation site.

- 2-12** *The first sentence of the fourth paragraph is revised as follows in response to comment C-1.4:*

Figure 2-2, *Proposed Project* shows the locations of the subtransmission source line segments and lists the type and number of all new poles within each segment.

- 2-12** *Table 2-1 is revised in response to comment A-1.42, as shown on the following page:*

**TABLE 2-1
APPROXIMATE SUBTRANSMISSION STRUCTURE DIMENSIONS**

Pole Type	Approximate Diameter	Approximate Height Above Ground	Approximate Auger Hole Depth	Approximate Auger Hole Diameter
Wood	1 to 2 feet	35 to 75 feet	8 to 10 feet	2 to 4 feet
Light Weight Steel (LWS)	<u>1 2</u> to 3 feet	<u>35 65</u> to 100 feet	8 to 11 feet	2 to 4 feet
Tubular Steel Pole (TSP)	2 to 4 feet	70 to 100 feet	Not Applicable	Not Applicable
TSP Concrete Foundation	5 to 8 feet	2 to 4 feet	20 to 30 feet	5 to 8 feet

SOURCE: SCE, 2010a

2-13 *Figure 2-5 has been modified with the following footnote in response to comment A-1.43:*

NOTE: Please note the appearance of any LWS guy poles would be substantially similar to the appearance of a wood guy pole in terms of size and shape.

2-14 *The second sentence under “Light Weight Steel Poles” is revised as follows in response to comment A-1.42:*

LWS poles typically range from 35 65 to 100 feet ags with a base diameter of 1 2 to 3 feet tapering to approximately 1 foot diameter at the top of the pole.

2-15 *The following is added after “Location 6” in response to comment A-1.44:*

- Location 7: In the area of future Mango Avenue south of Summit Avenue, approximately 12 distribution poles would be removed and the existing facilities and transferred to the proposed subtransmission poles.

2-16 *Section 2.7, “Rights-of-Way Requirements” is revised as follows in response to comment A-1.45 and additional information provided in Data Request 4:*

The Falcon Ridge Substation would be constructed on an approximately 7.5-acre parcel of land owned by SCE.

SCE would need to upgrade existing rights for a strip of land approximately ~~24 acres with a 30 foot~~ foot wide ~~by approximately 6 miles long strip of land~~ located within the existing 250-foot-wide ROW ~~corridor which extends 7 miles along the SCE’s existing transmission ROW.~~ SCE’s current easement does not allow SCE to install additional facilities in the easement ROW; therefore, SCE would amend the existing easement to allow additional facilities, such as the proposed subtransmission line, to be installed within the existing easement.

SCE would also utilize ~~approximately 7.5 acres with a 30-foot-wide~~ strip of land located within the existing ~~SCE fee owned 330-foot-wide, 2 miles in length~~

~~transmission ROW~~ ROW corridor extending approximately 1.75 miles in length, parallel to and north of Summit Avenue. In addition, SCE would need to acquire rights for a 30-foot-wide strip of land located outside of the existing 330-foot-wide transmission ROW, extending approximately 0.5 mile. The additional 30-foot-wide easement strip is required to maintain conductor clearance between the existing 500 kV line and the proposed 66 kV line to accommodate conductor swing. This segment begins approximately 716 feet east of Cypress Avenue and extends east approximately 1,944 feet to Sierra Avenue and continues east and northeast approximately 703 feet to the proposed substation location.

Finally, SCE would need to acquire approximately 13 acres of new easement rights for a 30-foot-wide ROW for the subtransmission source lines and access roads. SCE would acquire a 30-foot wide easement for the subtransmission source lines for a distance of approximately 3.6 miles. The new acquisition of ROW would occur along South Highland Avenue, San Sevaine Road, the future extension of Mango Avenue, West Casmalia Street, and Locust Avenue.

The clarification of new right-of-way requirements is shown on Final EIR Figures 2-3a through 2-3b.

- 2-18** *The sentence above the bulleted list under “Construction” is revised as follows in response to comment A-1.47:*

Project construction would generally consist of the following components ~~occur in the following manner:~~

- 2-19** *The last sentence of the second paragraph under “Access Roads” is revised as follows in response to comment A-1.48:*

The graded road would have a minimum drivable width of 14 feet with 2 feet of shoulder on each side but may be wider depending upon field conditions as well as at some individual curve locations.

- 2-20** *The first complete sentence is revised as follows in response to comment A-1.49:*

Additionally, for new access roads, road gradients would be leveled so that any sustained grade does not exceed 14 ~~12~~ percent.

- 2-21** *The eighth bulleted item is revised as follows in response to comment A-1.50:*

- A new 24-foot-wide paved access road accessed via an asphalt concrete driveway along Sierra Avenue would be utilized for both substation and subtransmission line access. It is described in Section 3.1.1 Falcon Ridge Substation Description, subsection Substation Access. New 14-foot stub roads extending from this paved access road would be constructed in order to provide access to any subtransmission structures between Sierra Avenue and

Mango Avenue ROW. These stub roads would be approximately 1,100 feet in length.

2-21 *The tenth bulleted item is revised as follows in response to comment A-1.51:*

- A concrete driveway apron would be provided for all access roads extending from major roads.

2-22 *The paragraph under “Staging Area/Laydown Areas” and Table 2-2 are revised as indicated by Master Response 4:*

Construction staging for the Project would require temporary staging areas. The following locations are expected to be used as staging areas for the Project: south of Foothill Boulevard at Pepper Avenue, Rialto; the Etiwanda Substation; the Falcon Ridge Substation; northwest corner of Etiwanda Avenue at Foothill Boulevard; northeast corner of South Highland Avenue at San Sevaine Road; ~~and the Foothill Service Center; and the northeast corner of Etiwanda Avenue at Napa Street~~ (see **Figure 2-6, Potential Staging Area Locations**). The potential staging area locations offer from 0.5 to 8 ~~up to 5~~ acres of space.

**TABLE 2-2
POTENTIAL STAGING AREA LOCATIONS**

Name	Location	Condition	Approximate Area	Project Component
No. 1	South of Foothill Boulevard at Pepper Avenue, Rialto	Previously Disturbed	0.5 acre	Subtransmission
No. 2	Etiwanda Substation, Rancho Cucamonga	Previously Disturbed	3 acres	Subtransmission/ Telecommunications
No. 3	Proposed Falcon Ridge Substation, Fontana	Undisturbed	2 acres	Substation
No. 4	Northwest corner of Etiwanda Avenue at Foothill Boulevard, Rancho Cucamonga	Previously Disturbed	4 acres	Subtransmission
No. 5	Northeast corner of South Highland Avenue at San Sevaine Road, Fontana	Previously Disturbed	5 acres	Subtransmission
No. 6	Foothill Service Center, Fontana	Previously Disturbed	0.5 acre	Telecommunications
<u>No. 7</u>	<u>(Withdrawn by Applicant)</u>			
<u>No. 8</u>	<u>Northeast corner of Etiwanda Avenue at Napa Street, Rancho Cucamonga</u>	<u>Previously Disturbed</u>	<u>8 acres</u>	<u>Subtransmission</u>

SOURCE: SCE, 2010a; SCE Response to Data Request No. 7, August 30, 2012.

2-23 *Figure 2-6, Potential Staging Area Locations, is revised as indicated by Master Response 4.*

- 2-26** *The second and third sentences of the fourth paragraph are revised as follows in response to comment A-1.55:*

For LWS poles, after the base section is secured, the remaining top section would be placed onto the base section and the two sections would be set into place bolted together. The two sections may also be spot welded together for additional stability.

- 2-27** *The second sentence of the third paragraph is revised as follows in response to comment A-1.56:*

Mud slurry would be placed in the hole after during drilling as required to prevent the sidewalls from sloughing.

- 2-27** *The last two sentences of the sixth paragraph are revised as follows in response to comment A-1.58:*

When the base section is secured, the remaining sections would be set into place top section of the TSP would be set into place onto the base section and the two sections would be bolted together. The two sections may also be spot welded together for additional stability.

- 2-36** *The first sentence under “Storm Water Pollution Prevention Plan” is revised as follows in response to comment A-1.60:*

Construction of the Project would disturb a surface area greater than 1 acre; therefore, SCE would be required to obtain coverage under the Statewide Construction General Permit (Order No. 2009-0009-DWQ) ~~from the Santa Ana RWQCB.~~

- 2-44** *The following footnote is added to “City of Rialto” in Table 2-7 in response to comment A-1.61:*

Additionally, it should be noted that, for construction activities occurring within the City of Rialto, Rialto Municipal Code Section 9.50.060 exempts “[c]onstruction, operation, maintenance and repairs of equipment, apparatus or facilities...including...those of public utilities subject to the regulatory jurisdiction of the California Public Utilities Commission.”

- 2-44** *The first sentence of the last paragraph is revised as follows in response to comment A-1.62:*

SCE identified a number of applicant proposed measures (APMs) that would avoid or reduce potential impacts of the Project related to ~~aesthetics~~, biological resources and paleontological resources.

- 2-45** *The last sentence of the second paragraph is revised as follows in response to comment A-1.63:*

~~APM-BIO-02: Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Sage Scrub, and Annual Grassland/Disturbed Riversidean Alluvial Fan Sage Scrub Project impacts on sagescrub vegetation.~~

- 2-46** *The following is added after the last paragraph of APM-BIO-02:*

In lieu of developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition, and habitat types present are comparable to impacted habitat at the proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

Alternatives Analysis

- 3-4** *The fourth and fifth items under Section 3.2, Alternatives Development and Screening Process, are revised as follows as determined by the Lead Agency:*

- ~~4. Identify and evaluate other solar generation technology alternatives, if any, that have the potential to avoid or substantially lessen any of the significant effects of the Project;~~
- ~~5. Identify and evaluate whether alternative approaches, such as conservation and demand side management or distributed generation solar, could provide a reasonable feasible alternative to the Project; and~~

- 3-6** *Alternative 1 and Alternative 2 in Table 3-2, Summary of Alternatives Screening Analysis, are revised in response to comments A-1.65, A-1.67, A-1.68, and A-1.69, as shown on the following page:*

- 3-11** *The description of Alternative 1 is revised as follows in response to comment A-1.70:*

~~Three~~ Approximately 12 tubular steel poles TSPs would be required, ~~one at each of the proposed corners.~~ Wood Approximately 76 lightweight steel (LWS) poles and 6 wood/LWS guy poles would be installed along ~~the extension of~~ Summit Avenue, Mango Avenue, North Alder Street, Lowell Street, and along N. Locust Avenue.

**TABLE 3-2
SUMMARY OF ALTERNATIVES SCREENING ANALYSIS – FALCON RIDGE SUBSTATION PROJECT**

Alternative	Project Objectives Criteria	Feasibility Criteria	Environmental Criteria
Passes Screening			
<p>Alternative 1: Lowell Street Realignment Alternative</p> <p>Would extend north from Alder Substation, spanning the 210 Freeway and paralleling Locust Avenue until Lowell Street. It then would extend west along Lowell Street and continue past the end of Lowell Street to N. Alder Avenue. It then would extend south along N. Alder Avenue to Summit Avenue and west along Summit Avenue to Mango Avenue. It then would extend north along the future Mango Avenue ROW until it reaches the proposed substation site.</p> <p>Approximately 12 <u>Three</u> TSPs would be required, one at each of the proposed corners. <u>Approximately 76 LWS</u> Wood-poles and <u>6 wood/LWS guy poles</u> would be installed along the extension of <u>Summit Avenue, Mango Avenue, North Alder Street, Lowell Street,</u> and along N. Locust Avenue.</p>	Meets Project objectives.	Meets feasibility criteria.	<p>Meets environmental criteria.</p> <p><u>Aesthetics: no change anticipated</u></p> <p><u>Noise: no change anticipated</u></p> <p><u>Air Quality:</u> would reduce PM10 emissions by 40.3 lbs/day (i.e., approximately 16 percent) and PM2.5 emissions by 2.5 lbs/day (i.e., approximately 5 percent).</p> <p><u>Hazards:</u> Has potential to cross areas of higher fire hazard classification and would <u>cross the Rialto Concrete Products site, which occupies a portion of the area that is the subject of the B.F. Goodrich Superfund Site cleanup plan, be adjacent to three sites listed on the USEPA's CERCLIS database of contaminated sites.</u></p>
Fails Screening			
<p>Alternative 2: Phased Construction</p> <p>Revises the proposed construction schedule to preclude overlapping activities as necessary for construction-related air emissions to remain below SCAQMD-established significance thresholds for NO_x (100 lbs/day) and PM10 (150 lbs/day). This alternative would extend the overall construction period by 15 months and also would require:</p> <ul style="list-style-type: none"> • Replacement of two 22.4 MVA transformers with two 28 MVA transformers at the Randall Substation, extension of distribution switchrack, and construction of one 4-mile <u>12 kV distribution circuit estimated to be approximately 1 mile in length;</u> and • Replacement of two 22.4 MVA transformers with two 28 MVA transformers at the Alder Substation, relocation of existing substation equipment, equipment upgrades, and construction of one 4-mile <u>12 kV distribution circuit estimated to be approximately 1 mile in length.</u> 	Would not meet the objective of serving projected needs by June 2014.	Would not meet feasibility criteria due to unpredictable contractor availability and field conditions as well as other technical and economic constraints.	<p>Meets environmental criteria.</p> <p><u>Aesthetics: no change anticipated.</u></p> <p><u>Noise:</u> construction noise impacts would be similar and operational noise impacts would be the same as under the Project.</p> <p><u>Air Quality:</u> would reduce daily construction air emissions, but would result in increased overall emissions due to construction of alternative components.</p> <p><u>New Impacts:</u> None anticipated</p>

3-11 *The following is added to the description of Alternative 1 in response to comment A-1.71:*

Additional detail regarding Alternative 1 is as follows:

- Removal of one existing LWS pole and replacement with one new TSP outside of Alder Substation.
- Reconfiguring of several existing pole heads to accommodate the additional circuit from Alder Substation.
- Removal of approximately 31 existing wood distribution poles along Locust Avenue that contain distribution facilities, SCE telecommunications cable, and three third party (private) communication lines. Installation of new LWS poles and TSPs along Locust Avenue to accommodate the new 66 kV source line and the existing distribution facilities. The three third party (private) communication lines would have the option of attaching to the new subtransmission poles or relocating/re-routing due to the voltage increase.
- Installation of a combination of LWS poles and TSPs along Lowell Street, N. Alder Avenue, Summit Avenue, and Mango Avenue.
- Installation of several wood/LWS guy poles at several locations along the route.
- Existing sidewalks would need to be repaired and widened at several locations along the route.
- New access roads would be required to construct and maintain the subtransmission facilities.
- New fiber optic cable would be attached to the new subtransmission poles
- The final alignment and configuration of the new 66 kV line crossing private property between the end of Lowell Street and Alder Avenue will be determined during negotiations for easements with the property owner. Easements will also be required along the future west side of Mango Avenue. Easements will be required on Lowell Street to allow the poles to be set behind the future curb. Easements rights will be required to be upgraded on Locust in addition to overhang easements at Locust Avenue and Lowell Street. Overhang and/or anchor guy easements may be required along Locust Avenue, and at the corner of Alder Avenue and Summit Avenue.

3-11 *The second sentence under “Alternative 1” is revised as follows in response to comment A-1.72:*

This component of Alternative 1 would consist of the new 66 kV subtransmission facilities that would leave Alder Substation on existing structures (Etiwanda-Alder-Randall 66 kV Subtransmission Line) to the west for approximately

600 feet and would include removing one LWS pole, replacing it with one new TSP, and re-framing pole-heads to accommodate the second circuit. The new 66 kV subtransmission facilities on new structures would then extend north on Locust Avenue (spanning the 210 Freeway) and continue north along Locust Avenue (overbuilding an existing 12 kV line) until it intersects with Lowell Street extend north from Alder Substation, spanning the 210 Freeway and following Locust Avenue until its intersection with Lowell Street.

- 3-12** *The second sentence of the second paragraph is revised as indicated in Master Response 1:*

It also has the potential to cross areas of higher fire hazard classification than the Project alignment and would cross the Rialto Concrete Products site, which occupies a portion of the area that is the subject of the B.F. Goodrich Superfund Site cleanup plan be adjacent to three sites listed on the USEPA's CERCLIS database of contaminated sites.

- 3-14** *Figure 3-1, Alternative 1: Lowell Street Realignment Alternative, is revised in response to comment A-1.74.*

Environmental Analysis

- 4-1** *The second bulleted item is revised as follows in response to comment A-1.75:*

- Installation of ~~two~~ one approximately 3-mile-long and one approximately 9-mile-long 66 kV subtransmission source line segments to connect the Falcon Ridge Substation to the existing Alder and Etiwanda Substation, respectively.

- 4-3** *The last sentence of the second paragraph under "APM-BIO-01" is revised as follows in response to comment A-1.17:*

~~APM-BIO-02: Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Sage Scrub, and Annual Grassland/Disturbed Riversidean Alluvial Fan Sage Scrub Project impacts on sagescrub vegetation.~~

- 4-4** *The following is added after the first paragraph in response to comment A-1.76:*

In lieu of developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition, and habitat types present are comparable to impacted habitat at the

proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

Aesthetics

- 4.1-2** *The fifth sentence of the fourth paragraph is revised as follows in response to comment B-5.7:*

However, other locations provide a wider viewshed with views of the Project area from relatively greater distances, including from locations characterized by undeveloped open space agriculture, vacant land, or parks.

- 4.1-6** *The second sentence under “Land Use and Development Pattern” is revised as follows in response to comment A-1.77:*

The visual quality of the site is representative and characteristic of vacant and undeveloped agricultural land in the study area.

- 4.1-6** *The fifth sentence under “Land Use and Development Pattern” is revised as follows in response to comment A-1.78:*

Surface terrain is characterized by undeveloped ~~agricultural and~~ open space land covered with grass and brush (see Figure 4.1-2a, Photo A).

- 4.1-7** *The third sentence of the third paragraph is revised as follows in response to comment B-5.7:*

The visual character of areas surrounding the subtransmission source line routes can be generally characterized as falling within one of two distinct visual contexts: urban/developed and vacant/open space/~~agricultural~~, as discussed below.

- 4.1-7** *The last paragraph is revised as follows in response to comment B-5.7:*

Vacant/open space/~~agricultural~~ land in the vicinity of the Project is generally disturbed by human influence, including the presence of overhead electrical lines, transportation infrastructure, graded or disturbed areas, and remnants of past or present agricultural activity (see Figure 4.1-2b, Photos G and H). Vacant/open space/~~agricultural~~ areas, however, provide greater opportunity for long-range middleground and background views of the distinctive San Bernardino Mountains and San Gabriel Mountains, which form the character-defining backdrop for the region. While uncommon, northeasterly to northwesterly views of agricultural land that are unencumbered by visual disturbances (e.g., transmission towers, construction grading, highway overpasses and adjacent development) represent the most unique and high-quality views in the study area due to their bucolic nature. Generally, these areas are representative of

undeveloped areas ~~or agricultural development~~ in the Project area, with distinct views from select locations.

- 4.1-8** *The second sentence of the third paragraph is revised as follows in response to comment B-5.7:*

Even in vacant or undeveloped agricultural land uses within the study area, nighttime lighting is likely to be intense due to the close proximity of existing light sources.

- 4.1-9** *The third paragraph is revised as follows in response to comment B-5.7:*

Although these corridors provide views of scenic mountains in the background, the visual quality of landscape surrounding the scenic corridors is generally representative, as they are surrounded by the suburban, and/or developed, and/or agricultural development land described above under *Land Use and Development Pattern*.

- 4.1-26** *The eighth sentence of the second paragraph is revised as follows in response to comment A-1.84:*

Although not visible in the simulation, from this KOP viewers would also see the Etiwanda Subtransmission Source Line Route as it crossed Sierra Avenue and headed west adjacent to ~~within~~ existing ROW.

- 4.1-29** *The eighth sentence under “SR 210 and I-15” is revised as follows in response to comment B-5.7:*

Foreground features include open space, undeveloped agricultural areas, and highway structures such as light poles and signage.

- 4.1-31** *The second sentence under Impact 4.1-4 is revised as follows in response to comment A-1.87:*

All telecommunication equipment upgrades at the existing substations would occur within the existing MEER or within existing structures; therefore, no additional ground disturbance is associated with the proposed telecommunications work.

Agriculture and Forestry Resources

- 4.2-2** *The following is added to the definition of “Unique Farmland” in response to comment A-1.89:*

Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.

Air Quality

4.3-10 *The following changes have been made to the cleaning forms rows of Table 4.3-3 in response to comment A-1.94:*

Clearing forms	03-1	Use water spray to clear forms, <u>or</u>
	03-2	Use sweeping and water spray to clear forms, <u>or</u>
	03-3	Use vacuum system to clear forms.

4.3-17 *Mitigation Measure 4.3-1a is revised in response to comment B-4.1:*

Mitigation Measure 4.3-1a: For diesel-fueled off-road construction equipment of more than 50 horsepower ~~and on-road diesel-fueled vehicles~~, SCE shall make a good faith effort to use available construction equipment that meets the highest USEPA-certified tiered emission standards ~~ensure achievement of a Project-wide fleet average 20 percent NO_x reduction and 45 percent PM10 exhaust reduction compared to the most recent CARB fleet average~~. An Exhaust Emissions Control Plan ~~to achieve that~~ identifies each unit's certified tier specification, Best Available Control Technology (BACT), and the CARB or SCAQMD operating permit number (if applicable) ~~these reductions~~ 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. ~~Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as such become available. For all pieces of equipment that would not meet Tier 3 emission standards, the Exhaust Emissions Control Plan shall include 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.~~

4.3-17 *The second sentence of the last paragraph is revised as follows in response to comment A-1.97:*

As noted above, implementation of the ~~BAAQMD~~-SCAQMD fugitive dust BACMs have been factored into the emission estimates presented in Table 4.3-6.

4.3-21 *The following edits are made to the end of the first paragraph under Impact 4.3-5 in response to comment A-1.98:*

There would be no long-term ~~mobile or stationary~~ permanent sources of DPM emissions associated with operation and maintenance of the Project; however, there may occasionally be a need for a small number of diesel operated vehicles to perform certain maintenance activities. Emissions from these vehicles would be negligible and would not contribute to regional air quality violations.

Biological Resources

- 4.4-19** *The second sentence of the sixth paragraph is revised as follows in response to comment C-3.36:*

Suitable habitat for the San Diego pocket mouse is present elsewhere in the study area, and they area presumed present in portions of the study area that support scrub vegetation communities, including Riversidean sage scrub.

- 4.4-22** *The first sentence of the fifth paragraph is revised as follows in response to comment B-3.1:*

Following comprehensive botanical surveys that were consistent with the current protocols created by CDFG (CDFG, 2009), two non-listed special-status plants were identified in the study area: Plummer's mariposa lily and Parry's spineflower, and are discussed below (BonTerra, 2010b; 2011). No other special-status plant species were observed during focused plant surveys.

- 4.4-22** *The last sentence is revised as follows in response to comment C-3.34:*

This perennial bulbiferous herb occurs in coastal sage scrub (including Riversidean sage scrub); dry, rocky chaparral; and yellow-pine forest at elevations between 0 and approximately 5,580 feet amsl (Hickman, 1993).

- 4.4-23** *The second sentence of the second paragraph is revised as follows in response to comment C-3.34:*

This annual herb occurs in open, sandy sites, often on gravelly slopes in coastal or desert scrub (including Riversidean sage scrub) at elevations between approximately 980 and 3,940 feet amsl (Hickman, 1993).

- 4.4-31** *The following is added to APM-BIO-02 in response to comment A-1.76:*

In lieu of developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition, and habitat types present are comparable to impacted habitat at the Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

- 4.4-33** *The second sentence of the second bullet of Mitigation Measure 4.4-1 is revised as follows in response to comment A-1.104:*

Residual temporary impacts on disturbed mule fat scrub and undisturbed/disturbed Riversidean sage scrub shall be restored on site and/or mitigated at a replacement ratio of 1:1.

- 4.4-34** *The following is added after the last bullet of Mitigation Measure 4.4-1 in response to comment A-1.23:*

As an alternative to developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.

- 4.4-34** *The last sentence of the second paragraph under Impact 4.4-2 is revised as follows in response to comment C-3.36:*

Project impacts on sage scrub habitat would be avoided and/or minimized to the maximum extent practicable through the implementation of APM-BIO-02, which would reduce potential impacts to coast horned lizard, coast patch-nosed snake, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, American badger, and Los Angeles pocket mouse.

- 4.4-35** *Mitigation Measure 4.4-2 (and shown in Table ES-1 on page ES-13) is revised as follows in response to comment A-1.103:*

Mitigation Measure 4.4-2: SCE and/or its contractors shall avoid impacts to occupied Los Angeles pocket mouse habitat to the maximum extent feasible in the final Project design. SCE shall define Los Angeles pocket mouse habitat as “off limits” in construction plans and specifications. If complete avoidance is not feasible, mitigation measures shall be implemented to reduce potential project impacts within occupied habitat to the maximum extent feasible. Such measures could include minimizing that portion of the project footprint that could encroach on an occupied habitat area and staging materials and work so as not to encroach into such an area. The presence of a Biological Monitor during Project construction shall be required to ~~would~~ further ensure that any potential impacts to special-status wildlife species are avoided and minimized. For those impacts that cannot feasibly be avoided or further minimized, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.

- 4.4-36** *The sentence above Mitigation Measure 4.4-4 is revised as follows in response to comment C-3.37:*

~~The~~ With implementation of Mitigation Measure 4.4-4, the Project would have at least the minimum separation between energized conductors or between energized conductors and grounded hardware that is sufficient to protect the largest birds, and therefore would present little to no risk of bird electrocution. Line spacing and pole design would also lower the risk of collision. The potential for bird collisions or electrocutions that may occur as a result of the Project would be lowered such that this effect would not substantially reduce the number of state and/or federally protected birds, cause populations to drop below self-sustaining levels, restrict the range, or threaten to eliminate populations. Therefore, implementation of Mitigation Measure 4.4-4 would reduce potential impacts to a less-than-significant level.

- 4.4-36** *The last bullet of Mitigation Measure 4.4-4 is revised as follows in response to comment A-1.24:*

- ~~• Shield wires to minimize the effects from bird collisions.~~

- 4.4-37** *The last sentence of the first paragraph under Impact 4.4-5 is revised as follows in response to comment A-1.104:*

~~Proposed construction at the existing Etiwanda Substation would not impact riparian habitat or other sensitive natural communities.~~ Construction of the subtransmission source line from the existing Etiwanda Substation would temporarily impact a small area of disturbed mule fat scrub that occurs in association with drainage depressions. Mule fat scrub often is considered sensitive by CDFG and impacts to this community may be subject to state regulation.

- 4.4-37** *The following text and new Table 4.4-4 is added to the first paragraph under Impact 4.4-5 in response to comment B-3.8:*

Anticipated Project impacts to vegetation communities are summarized in Table 4.4-4.

- 4.4-37** *The last complete sentence is revised as follows in response to comment A-1.105:*

Construction at the existing Etiwanda Substation would temporarily impact two features totaling about 0.004 acre (180 sq. ft.) of waters of the U.S. and about 0.006 acre (260 sq. ft.) of waters of the state within the existing Etiwanda Substation (SCE, 2010, pg. 4.4-35; BonTerra, 2010e). Due to engineering restrictions and safety requirements regarding electrical clearances from adjacent power lines, avoidance of these features would not be feasible.

**TABLE 4.4-4
ANTICIPATED PROJECT IMPACTS TO VEGETATION COMMUNITIES**

Vegetation Types	Project Component			
	Etiwanda and Alder Subtransmission Source Line and Fiber-Optic Cable Routes	Alternative Subtransmission Source Line and Fiber-Optic	Falcon Ridge Substation and Staging Area	Etiwanda Substation Upgrades and Staging Area
Riversidean Alluvial Fan Sage Scrub	0.23	0.23	0.00	0.00
Disturbed Riversidean Alluvial Fan Sage Scrub	3.27	1.65	4.60	3.00
Disturbed Riversidean Sage Scrub	0.05	0.15	0.00	0.00
Disturbed Mule Fat Scrub	0.06	0.06	0.00	0.00
Annual Grassland	1.55	1.55	0.00	0.00
Annual Grassland/Disturbed Riversidean Alluvial Fan Sage Scrub	1.12	1.12	0.00	0.00
Vineyards	1.36	1.36	0.00	0.00
Ruderal	11.48	11.03	0.04	0.11
Ornamental	0.70	0.70	0.00	0.00
Disturbed	0.61	0.61	0.00	0.00
Developed	2.51	2.84	0.00	0.00
Developed/Ornamental	0.57	3.83	0.00	0.00
Developed/Ruderal	0.54	0.55	0.00	0.00
Flood Control Channel	0.13	0.13	0.00	0.00
Total Acreage	24.18	25.81	7.39	3.11

SOURCE: BonTerra, 2010a, modified based on subsequent survey data and project modifications

4.4-42 *The following has been added to the References in response to comment B-3.1:*

California Department of Fish and Game, 2009 (November 24). Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Sacramento, CA: CDFG.

Cultural Resources

4.5-22 *Mitigation Measure 4.5-3 is revised as follows in response to comment A-1.107:*

Mitigation Measure 4.5-3: If human remains are uncovered during Project construction, SCE and/or its contractors shall immediately halt all work, in the immediate vicinity, and SCE's archaeologist or cultural resources consultant shall contact the county coroner to evaluate the remains, and shall follow the procedures and protocols set forth in CEQA Guidelines §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 Health and Safety Code §7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 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 the SCE archaeologist and/or its cultural resources 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.

Greenhouse Gas Emissions

- 4.8-6** *The first two sentences in Section 4.8.4 are revised as follows in response to comment A-1.112:*

This analysis uses an approach for the determination of significance of GHG emissions based on the interim GHG significance thresholds adopted by the *South Coast Air Quality Management District (SCAQMD)*. The SCAQMD has adopted an interim operational screening significance threshold of 10,000 metric tons CO₂e per year for stationary/industrial sources (SCAQMD, 2008).

Hazards and Hazardous Materials

- 4.9-2** *The last sentence of the bulleted item is revised as indicated in Master Response 1:*

This site is located approximately 0.75 mile east of the proposed Falcon Ridge Substation, 0.9 mile north of the proposed Alder Subtransmission Source Line Route, and would be crossed by adjacent to the Alternative Source Line Route.

- 4.9-5** *The first sentence is revised as follows in response to comment A-1.114:*

The Project would remove ~~28~~ 37 existing wood poles.

- 4.9-9** *The second sentence is revised as follows in response to comment A-1.115:*

~~Four~~ Five public or private preschool and day-care centers were identified within 0.25 mile of the Project (SCE, 2010):

- 4.9-12** *The discussion of “Aboveground Storage of Petroleum Products” is revised as follows in response to comment A-1.40:*

Assembly Bill 1130 (2007) updated the Aboveground Petroleum Storage Act of 1990 (Health and Safety Code §§25270 to 25270.13) and requires the owner or operator of a tank facility with an aggregate storage capacity greater than 1,320 gallons of petroleum to file an inventory statement with the local CUPA and to prepare a spill prevention, control, and countermeasure (SPCC) plan. An

SPCC plan must identify appropriate spill containment or equipment for diverting spills from sensitive areas, as well as discuss facility-specific requirements for the storage system, inspections, recordkeeping, security, and personnel training.

~~The Aboveground Petroleum Storage Act (1990) and Assembly Bill 1130 (2008) require the owner or operator of a tank facility with an aggregate storage capacity greater than 1,320 gallons of petroleum to file an inventory statement with the CUPA and to prepare and implement a spill prevention, control, and countermeasure (SPCC) plan in accordance with the requirements of 40 CFR 112. The plan must identify appropriate spill containment or equipment for diverting spills from sensitive areas, as well as discuss facility specific requirements for the storage system, inspections, recordkeeping, security, and personnel training.~~

- 4.9-13** *The third sentence under “Hazardous Materials Emergency Response” is revised as follows in response to comment A-1.116:*

The plan is administered by the California Emergency Management Agency (Cal-EMA) State Office of Emergency Services (OES). The Cal-EMA OES coordinates the responses of other agencies, including the USEPA, CHP, CDFG, the RWQCBs, the local air districts (in this case, the SCAQMD), and local agencies.

- 4.9-18** *The following sentence in the first paragraph under Impact 4.9-1 has been revised as follows in response to comment A-1.117:*

Among other things, the WEAP would provide instructions for implementation of the Project SWPPP, including site-specific BMPs required by the ~~RWQCB through its review and approval of the SWPPP~~, the location of the MSDS, and notification procedures in the event of a spill, leak, or discovery of soil contamination.

- 4.9-21** *The first sentence of the third paragraph has been revised as follows in response to comment C-4.43:*

During construction activities for the Project, the potential exists that subsurface utilities (e.g., a natural gas line) or structures (e.g., an UST or LUST) might be encountered and damaged, resulting in a release of a hazardous material.

- 4.9-22** *The following sentence in the first paragraph under Impact 4.9-3 has been revised as follows in response to comment A-1.119:*

Standard construction water quality BMPs required by the ~~RWQCB through its review and approval of the SWPPP~~ include measures for the safe handling and

storage of hazardous materials used during construction to prevent a release and methods to contain any such release if it should occur.

4.9-27 *The second sentence of the first paragraph is revised as indicated in Master Response 1:*

The alternative alignment of the Alder Subtransmission Source Line and Fiber Optic Cable Route would cross the Rialto Concrete Products site, which occupies a portion of border on three sides the 160-acre contaminated area that is the subject of the B.F. Goodrich Superfund Site cleanup plan (Figure 4.9-1).

Hydrology and Water Quality

4.10-11 *“Construction General Permit” is revised as follows in response to comment A-1.124:*

Construction General Permit (SWRCB Order 2009-0009-DWQ as amended by 2010-0014-DWQ).

4.10-18 *The fourth and fifth sentences of the third paragraph are revised as follows in response to comment A-1.126:*

Permit requirements would include the preparation of a SWPPP or multiple SWPPPs, implementation and monitoring of BMPs, implementation of best available technology (BAT) for toxic and non-conventional pollutants, implementation of best conventional technology (BCT) for conventional pollutants, and periodic submittal of performance summaries and reports ~~to the Santa Ana RWQCB~~. The SWPPP(s) ~~would apply to the Project as a whole~~ would include reference to the major construction areas, such as the proposed Falcon Ridge Substation, materials staging areas and underground work associated with telecommunications facilities and relocation of existing transmission poles.

Land Use and Planning

4.11-4 *The second and third sentences of the last paragraph are revised as follows in response to comment A-1.131:*

The subtransmission source line route would be within the existing SCE ROW, delineated as *P-UC* on the city’s land use map and not included in the specific plan areas, with the exception of: 1) the portion that would divert from SCE’s ROW and extend east parallel to South Highland Avenue to San Sevaine Road, then extend north paralleling San Sevaine Road and spanning the 210 Freeway until reentering SCE’s ROW; and 2) approximately 0.5 mile between Cypress Street and the proposed Falcon Ridge Substation location through the Summit at Rosena Specific Plan area, where SCE’s existing rights would be upgraded. These ~~This~~ portions would be located within areas of *RMU* and *R-PC* designation within the West Gate Specific Plan and Summit at Rosena Specific Plan, which ~~that~~ are not yet built out (City of Fontana 1996, 2011a-f).

4.11-10 *The last sentence is revised as follows in response to comment A-1.132:*

While the proposed Etiwanda Subtransmission Source Line route and proposed telecommunication facilities would cross through existing residential communities in the City of Fontana, the portions of the route that would traverse these communities would be primarily within the existing SCE ROW and these facilities would not restrict access or constitute a physical barrier to these communities.

4.11-11 *The fifth sentence of the second paragraph is revised as follows in response to comment C-3.1:*

The Project would not conflict with any applicable agency land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect.

Noise

4.13-8 *The San Bernardino County Code discussion is revised as follows in response to comment A-1.136:*

San Bernardino County regulates noise with County Code §83.01.080, *Noise*. The interior L_{dn} noise level limit for mobile noise sources adjacent to noise-sensitive uses, such as residences, is 45 dB and the interior L_{dn} noise level limit is 60 dB. Noise from stationary sources at receiving residential land uses is limited to 55 dB L_{eq} from 7:00 a.m. to 10:00 p.m. and 45 dB L_{eq} from 10:00 p.m. to 7:00 a.m. Temporary construction, maintenance, repair, or demolition activities are exempt if they occur between 7:00 a.m. and 7:00 p.m., except on Sundays and Federal holidays (San Bernardino County, 2007b).

4.13-9 *The City of Rialto Municipal Code discussion is revised as follows in response to comment A-1.141:*

Construction activities under the Project are exempt from the provisions of Chapter 9.50 of the City of Rialto Municipal Code.

- **§9.50.060, Exemptions.** The following activities and noise sources shall be exempt from the provisions of this chapter:

K. Construction, operation, maintenance and repairs of equipment, apparatus or facilities of park and recreation departments, public work projects or essential public services and facilities, including trash collection and those of public utilities subject to the regulatory jurisdiction of the California Public Utilities Commission.

~~L. Construction, repair, or excavation work performed pursuant to a valid written agreement with the city or any of its political~~

~~subdivisions which agreement provides for noise mitigation measures.~~

4.13-12 *The first paragraph in Section 4.12.4 2 is revised as follows in response to comment A-1.144:*

In addition to the fact that construction activities in unincorporated San Bernardino County and the cities of Fontana and Rialto are exempt from the noise regulation provisions in their codes if the construction activities occur during the hours presented in Table 4.13-3, it should also be noted that as a utility project subject to the regulatory jurisdiction of the CPUC, any work associated with the Project in the City of Rialto would also be exempt from otherwise applicable noise control regulations contained in Chapter 9.50 of the city's municipal code. ~~Construction activities in unincorporated San Bernardino County and the cities of Fontana and Rialto are exempt from the noise regulation provisions in their code if the construction activities occur during the hours presented in Table 4.13-3.~~ Construction activities are allowed within the City of Rancho Cucamonga during the hours presented in Table 4.13-3, and must also comply with noise exposure limits (see Impact 4.13-2 discussion). Construction activities would not be allowed on Sundays or national holidays within any jurisdiction in the study area.

4.13-13 *Table 4.13-3 is revised as follows in response to comment A.1-145:*

**TABLE 4.13-3
LOCAL JURISDICTIONS-PERMITTED HOURS FOR CONSTRUCTION WORK**

City/County	Permitted Hours		
	Monday-Friday	Saturday	Sunday and Holidays
San Bernardino County	7:00 a.m. - 7:00 p.m.	7:00 a.m. - 7:00 p.m.	None
City of Fontana	7:00 a.m. - 6:00 p.m.	8:00 a.m. - 5:00 p.m.	None
City of Rialto (Oct.-Apr)*	7:00 a.m. - 5:30 p.m.	8:00 a.m. - 5:00 p.m.	None
City of Rialto (May-Sep)*	6:00 a.m. - 7:00 p.m.	8:00 a.m. - 5:00 p.m.	None
City of Rancho Cucamonga**	6:30 a.m. - 8:00 p.m.	6:30 a.m. - 8:00 p.m.	None

* Although these regulations are applicable to construction work in general, as a utility, all SCE utility project work activities are exempt from all timing requirements under the City of Rialto's Municipal Code.

** Construction noise exposure shall not exceed 65 dB L₂₅, 70 dB L₁₇, 79 dB L₈, or 80 dB L_{max} at noise-sensitive property lines (e.g., residential property lines).

SOURCES: San Bernardino County, 2007b; City of Fontana, 2007; City of Rialto, 2008; and City of Rancho Cucamonga, 1983

- 4.13-19** *The paragraph that precedes Mitigation Measure 4.13-5 is revised as follows in response to comment A-1.147:*

Although construction activities would generally occur during daytime hours, there remains a possibility that some nighttime construction work would be required on a limited basis. As described above, construction activity noise levels could be up to 84 dBA at the closest residences, and average hourly nighttime noise levels in the Project area have been measured to be as low as 43 dBA (see Table 4.13-1). At 1,000 feet from construction activity at the substation site, the maximum noise level would be up to approximately 51 dBA. Therefore, at this distance and beyond, the increase in nighttime noise level would be expected to be less than 10 dBA. Because a 10 dB change is subjectively heard as approximately a doubling in loudness, and can cause an adverse response, it is assumed that nighttime construction activity noise 1,000 feet or farther from an active construction area would not cause a significant nuisance to residential sensitive receptors. Therefore, ~~In addition,~~ implementation of Mitigation Measure 4.13-5 would ensure that construction activities outside of permitted hours (Table 4.13-3) would be mitigated to a less-than-significant level by reducing the nuisance to residences within 1,000 feet of nighttime construction activities.

Population and Housing

- 4.14-3** *The last sentence of the first paragraph is revised as follows in response to comment A-1.148:*

Because of the requirements of Senate Bill (SB) 375, SCAG is preparing the next RHNA planning cycle which will cover ~~January 1, 2011~~ October 1, 2013 to September 30, 2021 (SCAG, 2011b).

Public Services

- 4.15-10** *The footnote is revised as follows in response to comment A-1.153:*

In San Bernardino ~~Riverside~~ County in 2010, 283, 252~~242,985~~ households had children under the age of 18, and the total county population of children under the age of 18 was 664,577~~594,588~~ (U.S. Census Bureau, 2010). This gives a rough average of 2.45 children per household with children present. Assuming each of the 90 temporary construction workers represented one average household with children, this could result in an increase of 216~~225~~ children in the service areas of the Rialto Unified, Etiwanda, or Fontana Unified school districts.

Recreation

4.16-8 *The first paragraph is revised as follows in response to comment A-1.158:*

~~Both the subtransmission line and fiber optic cable would be strung along existing aboveground structures in these portions of the alignment, and no new wood poles, TSPs, or other structures would be constructed within these portions of the ROW. Therefore, no ground disturbing construction activities would take place within these segments of the ROW.~~ New subtransmission poles and access roads would be located within these portions of the ROW. However, and Project construction of access roads and new poles would not contribute to or accelerate the substantial physical deterioration of these facilities, and this impact would be less than significant.

Transportation and Traffic

4.17-16 *The second sentence of the second paragraph is revised as follows in response to comment A-1.168:*

Therefore, Mitigation Measures 4.17-1 ~~and 4.17-2~~ identified for the Project would also be required for this alternative.

Utilities and Service Systems

4.18-8 *The third paragraph is revised as follows in response to comment A-1.169:*

~~Construction of the proposed subtransmission source line routes would span drainages, but SCE does not anticipate placing structures within drainages would require construction activities to be conducted in an existing drainage outside of Etiwanda Substation, as explained and analyzed in Section 4.4, *Biological Resources*.~~ The proposed telecommunications facilities and proposed distribution getaways would not add any new aboveground structures, as the telecommunication facilities are proposed to be located on the new subtransmission poles. Maintenance of these structures would also not affect drainage. Therefore, construction, operation, and maintenance would not alter existing drainage patterns or stormwater runoff.

4.18-9 *The following is added after the second sentence of the first paragraph in response to comment C-3.57:*

Based on construction equipment information provided by the Applicant (SCE, 2010), the Project is conservatively estimated to require approximately 3.7 acre-feet of water throughout the construction phase. However, actual water use would likely be less because this estimate assumes that each day of water truck use would result in the use of the truck's full capacity (4,000 gallons), but actual

use could be lower depending on the duration of construction, weather conditions, and other variables.

4.18-10 *The first sentence under Impact 4.18-4 is revised as follows in response to comment A-1.172:*

As described in Chapter 2, *Project Description*, the Project would require the removal and disposal of approximately 37 ~~25~~ existing wood poles.

APPENDIX A

Notice of Availability

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**PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298**



**To: State Clearinghouse, Responsible and Trustee Agencies, Property Owners
& Interested Parties**

From: John Boccio, Environmental Project Manager

**Subject: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT
(DRAFT EIR) AND PUBLIC MEETING:
Falcon Ridge Substation Project (A.10-12-017)
SCH No. 2011041009**

Date: January 26, 2012

The California Public Utilities Commission (CPUC) has prepared a Draft Environmental Impact Report (Draft EIR) under the California Environmental Quality Act (CEQA) for consideration of the application by Southern California Edison (SCE) to construct, operate, and maintain the Falcon Ridge Substation Project (A.10-12-017). The Draft EIR details the proposed project, evaluates and describes the potential environmental impacts associated with the project, identifies those impacts that could be significant, and presents mitigation measures which, if adopted by the CPUC or other responsible agencies, could avoid or minimize these impacts. The Draft EIR also evaluates alternatives to the project, including a No Project Alternative, as required by CEQA.

Description of the Project.

The project is located in the cities of Rancho Cucamonga, Fontana, Rialto, and a portion of unincorporated San Bernardino County. SCE requests authorization to:

- Construct an unattended, automated 56 MVA 66/12 kilovolt (kV) low-profile substation (Falcon Ridge Substation) located on a 7.5-acre parcel in the City of Fontana;
- Install two 66 kV subtransmission source line segments to connect the Falcon Ridge Substation to the existing Alder 66/12 kV Substation and existing Etiwanda 220/66 kV Substation (upgrades would occur within each of these substations to accommodate the project);
- Construct three underground 112 kV distribution getaways; and
- Install telecommunications facilities (fiber-optic) at the proposed Falcon Ridge Substation, install fiber-optic cable on the proposed 66 kV subtransmission source lines, and modify the existing telecommunications facilities at the existing Etiwanda and Alder Substations to connect the proposed substation to SCE's existing telecommunications network.

The objectives of the project are to meet long-term electrical demand requirements and improve electrical system operational flexibility and reliability in the electrical needs area (see Figure 1).

Public Comment on the Draft EIR.

The Draft EIR is available for a 45-day public comment period, January 26, 2012 through March 12, 2012. The public may present comments and concerns regarding the project and the adequacy of the Draft EIR. Written comments on the Draft EIR must be postmarked or received by fax or e-mail no later than March 12, 2012. Please be sure to include your name, address, and telephone number in your correspondence.

Written comments on the Draft EIR should be sent to:

Mr. John Boccio
Falcon Ridge Substation Project
c/o ESA
225 Bush St., Suite 1700
San Francisco, CA 94104
Phone: (415) 896-5900
Fax: (415) 896-0332
falconridge@esassoc.com

The CPUC also will hold a public meeting to receive oral and written comments from interested parties. Following the end of the public comment period, responses to all comments received on the Draft EIR and submitted within the specified 45-day review period will be prepared by the CPUC and included in a response to comments document, which together with the Draft EIR, will constitute the Final EIR for the project. The public meeting will be held:

Thursday, February 16, 2012
6:00 pm – 7:30 pm
Summit High School
Room G-101
15551 Summit Avenue
Fontana, CA 92336

Availability of Draft EIR.

Copies of the Draft EIR will be available for public review at the libraries identified below and on the project website: <http://www.cpuc.ca.gov/Environment/info/esa/falconridge/index.html> This website will be used to post all public documents during the environmental review process and to announce any upcoming public meetings. Hard copies or CD copies of the Draft EIR may be requested by telephone at (415) 896-5900 or by e-mail at falconridge@esassoc.com.

Project information repositories include the following branch libraries:

Fontana Lewis Library 8437 Sierra Avenue Fontana, CA 92335 Phone: (909) 574-4500	Carter Branch Library 2630 N. Linden Avenue Rialto, CA 92377 Phone: (909) 854-4100	Paul A. Biane Library 12505 Cultural Center Drive Rancho Cucamonga, CA 91739 Phone: (909) 477-2720
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REMINDER: Draft EIR comments will be accepted by fax, e-mail, or U.S. Mail postmarked on or before March 12, 2012. Please be sure to include your name, address, and telephone number in your correspondence.

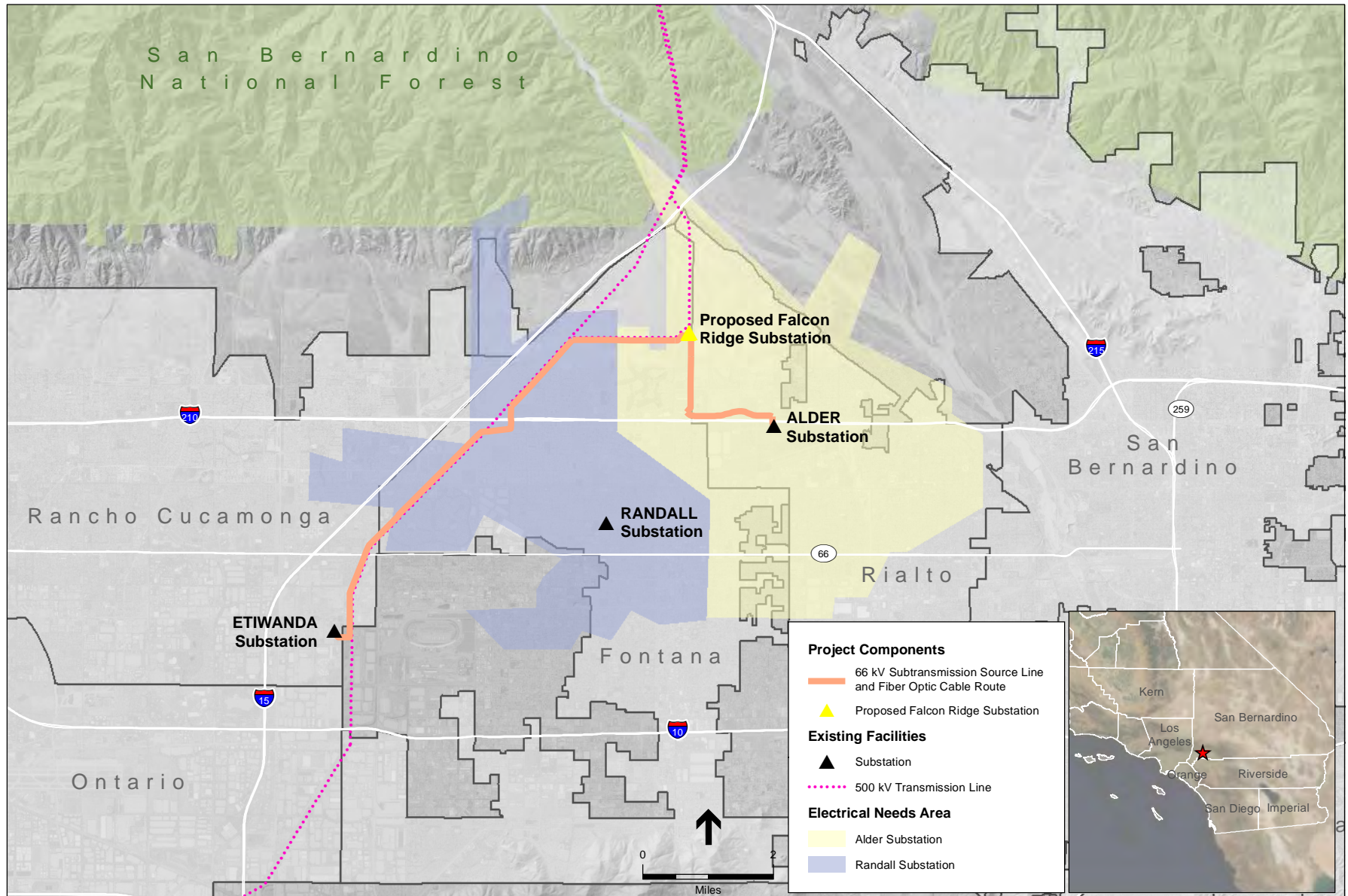


Figure 1
Electrical Needs Area

APPENDIX B

Draft EIR Newspaper Legal Advertisements

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INLAND VALLEY
DAILY BULLETIN
(formerly The Daily Report)

2041 E. 4th Street
Ontario, CA 91764

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of San Bernardino

I am a citizen of the United States, I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of INLAND VALLEY DAILY BULLETIN, a newspaper of general circulation printed and published daily in the City of Ontario, County of San Bernardino, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of San Bernardino, State of California, on the date of August 24, 1951, Case Number 70663. The notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

1/30, 2/6/12

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Ontario, San Bernardino Co. California
this 1 day of February, 20 12

signature

Proof of

**California Public Utilities Commission
Public Notification for Release of a
Draft Environmental Impact
Report and Public Comment
Meeting for the Falcon Ridge
Substation Project**

Notice is hereby given that the California Public Utilities Commission (CPUC) has released a Notice of Availability for the Draft Environmental Impact Report (DEIR) for the Falcon Ridge Substation Project (Project), for public review and comment. The DEIR addresses environmental impacts of the construction, operation, and maintenance of the Project and alternatives. Information to be included in the Final EIR also will be based on input and comments received during the 45-day comment period that is open from January 26, 2012 until 5:00 p.m. on March 12, 2012. The DEIR is available for public review on the Project website at: <http://www.cpuc.ca.gov/Environment/Info/esa/falconridge/index.html>. The website includes further information on the environmental review process for this Project and will be updated during the review process. Public comments may be submitted in writing to: Mr. John Boccio, Falcon Ridge Substation Project, c/o ESA, 225 Bush St., Suite 1700, San Francisco, CA 94104; by fax to (415) 896-0332; or by email to falconridge@esassoc.com.

Additionally, the CPUC will hold a Public Meeting from 6:00 p.m. to 7:30 p.m. on Thursday, February 16, 2012 at Summit High School, Room G-101, 15551 Summit Avenue, Fontana, California, 92336 to accept comments on the DEIR. All members of the public are invited to participate in the meeting.

Published: January 30, February 6, 2012 #96253

Fontana Herald News

16981 Foothill Blvd.
Suite N
Fontana, CA 92335
909-822-2231

Proof of Publication

(2015.5 C.C.P.)

CPUC

Notification of Impact Report

State of California)
County of San Bernardino) ss.

I am a citizen of the United States and a resident of the State of California; I am over the age of eighteen years, and not a party to or interested in the above matter. I am the principal clerk of the printer and publisher of Fontana Herald News, a newspaper published in the English language in the City of Fontana, County of San Bernardino, and adjudicated a newspaper of general circulation as defined by the laws of the state of California by the Superior Court of the County of San Bernardino, under the date March 15, 1955, Case No. 73171. That the notice, of which the annexed is a copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

February 3, 2012

Executed on: 02/03/2012

At Fontana , CA

I certify (or declare) under penalty of perjury that the foregoing is true and correct.



Signature

**California Public Utilities Commission
Public Notification for Release of a Draft
Environmental Impact Report and Public
Comment Meeting for the Falcon Ridge
Substation Project**

Notice is hereby given that the California Public Utilities Commission (CPUC) has released a Notice of Availability for the Draft Environmental Impact Report (DEIR) for the Falcon Ridge Substation Project (Project), for public review and comment. The DEIR addresses environmental impacts of the construction, operation, and maintenance of the Project and alternatives. Information to be included in the Final EIR also will be based on input and comments received during the 45-day comment period that is open from January 26, 2012 until 5:00 p.m. on March 12, 2012. The DEIR is available for public review on the Project website at: <http://www.cpuc.ca.gov/Environment/info/esa/falcon-ridge/index.html>

The website includes further information on the environmental review process for this Project and will be updated during the review process. Public comments may be submitted in writing to: Mr. John Boccio, Falcon Ridge Substation Project, c/o ESA, 225 Bush St., Suite 1700, San Francisco, CA 94104; by fax to (415) 896-0332; or by email to falconridge@esassoc.com.

Additionally, the CPUC will hold a Public Meeting from 6:00 p.m. to 7:30 p.m. on Thursday, February 16, 2012 at Summit High School, Room G-101, 15551 Summit Avenue, Fontana, California, 92336 to accept comments on the DEIR. All members of the public are invited to participate in the meeting.

Publish 2/03/2012

APPENDIX C

CPUC Project Website

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STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION

Southern California Edison's Falcon Ridge Substation Project

(Application A.10-12-017, filed December 29, 2010)

Welcome to the California Public Utilities Commission (CPUC) website for the California Environmental Quality Act (CEQA) review of proposed construction of Southern California Edison's (SCE) Falcon Ridge Substation Project. An application for this project was submitted to the CPUC on December 29, 2010 (Application [A.10-12-017](#)). This site provides access to public documents and information relevant to the CEQA review process.



Files linked on this page are in Portable Document Format (PDF). To view them, you will need to download the free [Adobe Acrobat Reader](#) if it is not already installed on your PC. Note: For best results in displaying the largest files (see sizes shown in parentheses below for files larger than 3.0 MB), right-click the file's link, click "Save Target As" to download the file to a folder on your hard drive, then browse to that folder and double-click the downloaded file to open it in Acrobat.

Background

BACKGROUND

The CPUC is preparing an Environmental Impact Report (EIR) for the Falcon Ridge Substation Project, and is requesting comments on the scope and content of the EIR. SCE seeks a permit to construct (PTC) the Falcon Ridge Substation, which includes the following major elements:

- Construction of a 66/12 kilovolt (kV) substation (Falcon Ridge Substation). Falcon Ridge Substation would be an unattended, automated 56 MVA 66/12 kV low-profile substation located on a 7.5-acre parcel in the City of Fontana;
- Installation of two 66 kV subtransmission source line segments to connect the Falcon Ridge Substation to the existing Alder 66/12 kV and Etiwanda 220/66 kV substations (upgrades would occur within each of the existing substations to accommodate the Project);
- Construction of three underground 12 kV distribution getaways; and
- Installation of telecommunications facilities at the proposed Falcon Ridge Substation, installation of telecommunications fiber optic cable on the proposed 66 kV subtransmission source lines, and the modification of the existing telecommunications facilities at the Etiwanda and Alder substations to connect the proposed substation to the SCE telecommunications network.

The purpose of the Project is to serve the current and projected demand for electricity, and enhance reliability and system operational flexibility in the cities of Rancho Cucamonga, Rialto, Fontana and the surrounding areas of unincorporated San Bernardino County (Electrical Needs Area).

Location of the Proposed Project

The substation site would be located in the City of Fontana, and the subtransmission source lines would be located in the cities of Rancho Cucamonga, Fontana, Rialto, and a portion of unincorporated San Bernardino County.

Proponent's Environmental Assessment (PEA)

To view the Application or PEA prepared by SCE for the project click a link below:

- [Application](#) [20.5mb]
- [PEA Volume 1](#) [57.4mb]
- [PEA Volume 2 - Appendices A-C](#)
- [PEA Volume 2 - Appendix D](#) [114.8mb]
- [PEA Volume 2 - Appendices E-H](#) [8.5mb]

To go to the SCE website for the project click [here](#).

Environmental Review

Public Scoping Period

On March 30, 2011 the CPUC published a Notice of Preparation (NOP) of an EIR for the Falcon Ridge Substation

Project (A.10-12-017). Click [here](#) to view the NOP. The scoping period for this Project began on Wednesday, March 30, 2011, and ended on Friday, April 29, 2011.

Educational Workshop and Scoping Meeting

An educational workshop and scoping meeting was held on Thursday, April 14, 2011, at Summit High School, 15551 Summit Avenue, Fontana, CA 92336

DEIR

Public Comment on the Draft EIR

On January 26, 2012 the CPUC published a Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the Falcon Ridge Substation Project (A.10-12-017). Click [here](#) to view the NOA.

The Draft EIR is available for a 45-day public comment period January 26, 2012 through March 12, 2012. The public may present comments and concerns regarding the Proposed Project and the adequacy of the Draft EIR. Written comments on the Draft EIR must be postmarked or received by fax or e-mail no later than March 12, 2012. Please be sure to include your name, address, and telephone number in your correspondence.

- To view the complete DEIR, click [here](#) (48.8mb) to view the DEIR.
- To view the Appendices for the DEIR, click [here](#) (5.82mb) to view the DEIR.

Written comments on the DEIR should be sent to:

Please send your comments to:

Mr. John Boccio
Falcon Ridge Substation Project
c/o ESA
225 Bush Street, Suite 1700
San Francisco, CA 94104
Fax: (415) 896-0332
E-mail: FalconRidge@esassoc.com

Public Meeting

On Thursday February 16, 2012 from 6:00 pm - 7:30 pm, the CPUC will hold a public comment meeting at Summit High School, Room G-101, 15551 Summit Avenue, Fontana, CA 92336, to receive oral and written comments from interested parties. Following the end of the public comment period, responses to all comments received on the Draft EIR and submitted within the specified 45-day review period will be prepared by the CPUC and included in a response to comments document, which together with the Draft EIR, will constitute the Final EIR for the Proposed Project.

Availability of Draft EIR

Copies of the Draft EIR are available for public review at the libraries identified below and on the project website. This website will be used to post all public documents during the environmental review process and to announce any upcoming public meetings. Hard copies or CD copies of the Draft EIR may be requested by telephone at (415) 896-5900 or by e-mail at FalconRidge@esassoc.com.

Project information repositories include the following libraries:

Repository Sites		
Site	Location	Phone
Fontana Lewis Library	8437 Sierra Avenue Fontana, CA 92335	(909) 574-4500
Carter Branch Library	2630 N. Linden Avenue Rialto, CA 92377	(909) 854-4100
Paul A. Biane Library	12505 Cultural Center Drive Rancho Cucamonga, CA 91739	(909) 477-2720

REMINDER: Draft EIR comments will be accepted by fax, e-mail, or U.S. Mail postmarked on or before March 12, 2012. Please be sure to include your name, address, and telephone number in your correspondence.

For Additional Information

The CPUC, through its Environmental Review Team, manages [environmental review](#) of the project. To request additional information or to be added to the mailing list, please contact us by email, fax, or phone, as follows:

Project email: FalconRidge@esassoc.com

Project voice mail: (415) 962-8492

Project fax: (415) 896-0332

This is best viewed with Firefox or Internet Explorer.

Please report any problems to the [Energy Division web coordinator](#).

[Project Home Page](#) - [CPUC Environmental Information](#) - [CPUC Home](#) - [Top](#)

WEBINFO

APPENDIX D

Public Meeting Sign-in Sheets and Speaker Cards

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**Southern California Edison's Falcon Ridge Substation Project
 Notice of Availability of the Draft Environmental Impact Report
 Public Meeting
 Hosted by the California Public Utilities Commission (CPUC)**

Meeting Location: 15551 Summit Avenue, Fontana, California 92336

Date/Time: Thursday, February 16, 2012 from 6:00 p.m. to 7:30 p.m.

Name	Affiliation	Address	Email address
Jasmin A. Hall	Planning Commission City of Fontana	8353 Sierra Ave.	jahall2002@yahoo.com
Aaron Gettis	Gresham Savage Nolan & Tilden, PC	550 East Hospitality, ^{Summit Ave} ^{Fontana} 92336	Aaron.Gettis@GreshamSavage.com
Oswald Realegno	Homeowner	5572 Coralwood Pl	ososa2@yahoo.com
Charles Fahie	CITY OF FONTANA Senior Planner	8353 Sierra Ave.	cfahie@fontana.org
JESS HARRIS	JHA CONSULTING, INC / UNITEX ^{MANAGER}	17782 East 17th Street Suite 200, TUSTIN CA 92780	jharris@jhaconsulting.net
John Hogan	Hall & Foreman, Inc. / Intex Properties	17782 17th St. #200 Tustin, CA 92780	jhogan@hfinc.com

**Southern California Edison's Falcon Ridge Substation Project
 Notice of Availability of the Draft Environmental Impact Report
 Public Meeting
 Hosted by the California Public Utilities Commission (CPUC)**

Meeting Location: 15551 Summit Avenue, Fontana, California 92336

Date/Time: Thursday, February 16, 2012 from 6:00 p.m. to 7:30 p.m.

Name	Affiliation	Address	Email address
Matt Slowik	CITY OF FONTANA	PO Box 808 Fontana Ca 92334	M.SLOWIK@LUSCA-SBCOUNTY.SOV
Christiam Nelson	SCE	1351 E Francis Ontario, CA 91761	Christiam.Nelson@sce.com
John Nolan	MITCHELL + CO	3250 University Ave. Riverside, Ca. 92501	John.nolan@grahamsouge.com
SHANNON WIDOR	SCE	2244 WALNUT GROVE, ROSEMead, CA 91770	SHANNON.WIDOR@SCE.COM
Thomas Diaz	SCE	" "	Thomas.Diaz@SCE.COM
Greg Lantz	City of Rialto	150 S B Dm Ave Rialto CA 92376	Glantz@Rialto.ca.gov

D4

Speaker Card

Southern California Edison's Falcon Ridge Substation Project
Notice of Availability of the Draft Environmental Impact Report Public Meeting
February 16, 2012 at 6:00 P.M.

Name: Oswald Realegeno

Mailing Address: 5522 coralwood pl
Fontana, CA 92336

Organization (if applicable): Homeowner

Brief Comment: EMF impact on residents close to
power lines.

Speaker Card

Southern California Edison's Falcon Ridge Substation Project
Notice of Availability of the Draft Environmental Impact Report Public Meeting
February 16, 2012 at 6:00 P.M.

Name: John Hogan

Mailing Address: 17782 17th St. #200
Tustin, CA 92780

Organization (if applicable): ~~Intex~~ Intex Properties c/o Hall & Foreman, Inc.

Brief Comment: We wish for SCE to consider an
alternative alignment for the proposed segment
along the Intex Property at S. Highland and
Sam Sevaire Road.

Speaker Card

Southern California Edison's Falcon Ridge Substation Project
Notice of Availability of the Draft Environmental Impact Report Public Meeting
February 16, 2012 at 6:00 P.M.

Name: GREG LANTZ - City of Rialto

Mailing Address: 150 S. Palm Avenue
Rialto CA 92376

Organization (if applicable): City of Rialto

Brief Comment: - Issues Related to the Location Aesthetics
- Did not address Alternative Routes suggested by
City of Rialto
- Mitigation not adequate

Speaker Card

Southern California Edison's Falcon Ridge Substation Project
Notice of Availability of the Draft Environmental Impact Report Public Meeting
February 16, 2012 at 6:00 P.M.

Name: Charles Fahie

Mailing Address: 8353 Sierra Ave

Organization (if applicable): City of Fontana, Planning Division

Brief Comment: Concerned with that the evaluation of the
Aesthetic issues is not adequate. Significant Aesthetic impacts
in Fontana can and should be mitigated. Aesthetic impacts not found
significant in the DEIR are significant and should be mitigated by

APPENDIX E

Public Meeting Presentation

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California Public Utilities Commission CEQA Public Comment Meeting

E-3

Southern California Edison Falcon Ridge Substation Project

February 16, 2012
Summit High School
15551 Summit Avenue, Fontana, California

Participants and their Roles

- CPUC: California Environmental Quality Act (CEQA) Lead Agency

E-4

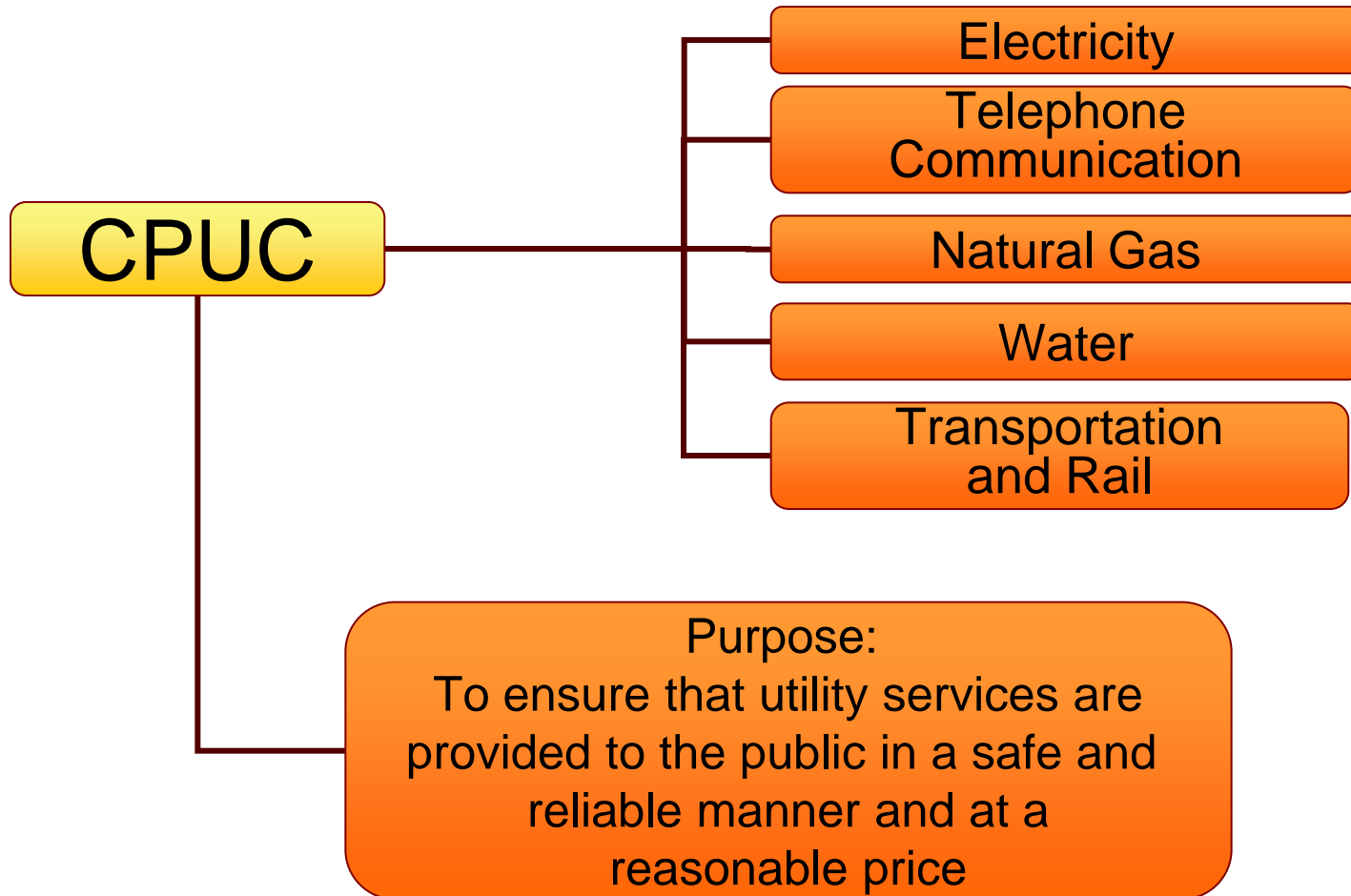
- SCE: Project Applicant

- Public Agencies, Organizations, and Members of the Public: Sources of key input into EIR process

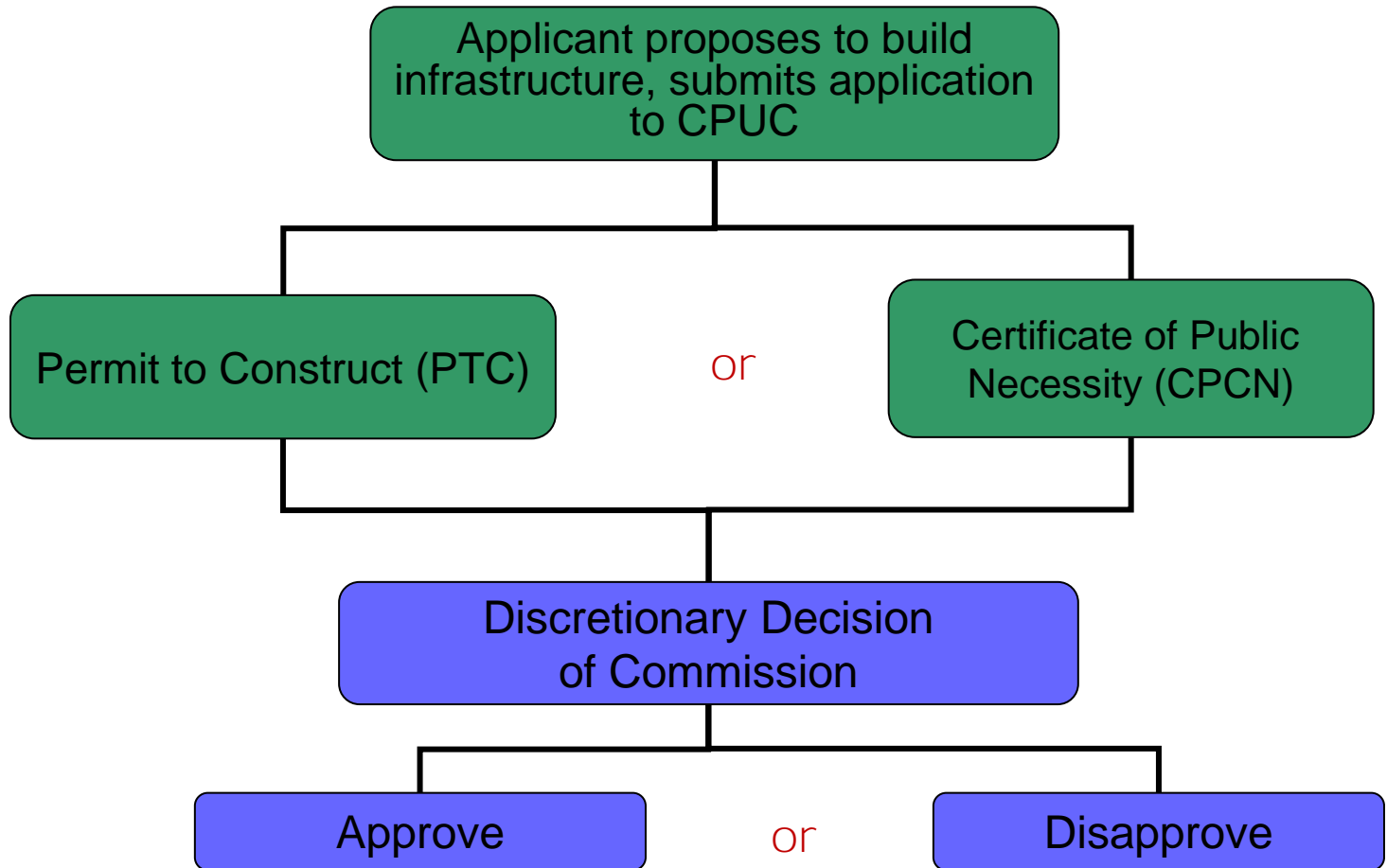
Meeting Agenda

- Overview of the CPUC's Decision and Review Processes
- Summary of the CEQA Context
- Description of the Project and Alternatives
- Identification of the Environmentally Superior Alternative
- Overview of the Draft EIR for the Project
- Public Comments

Who does the CPUC regulate?

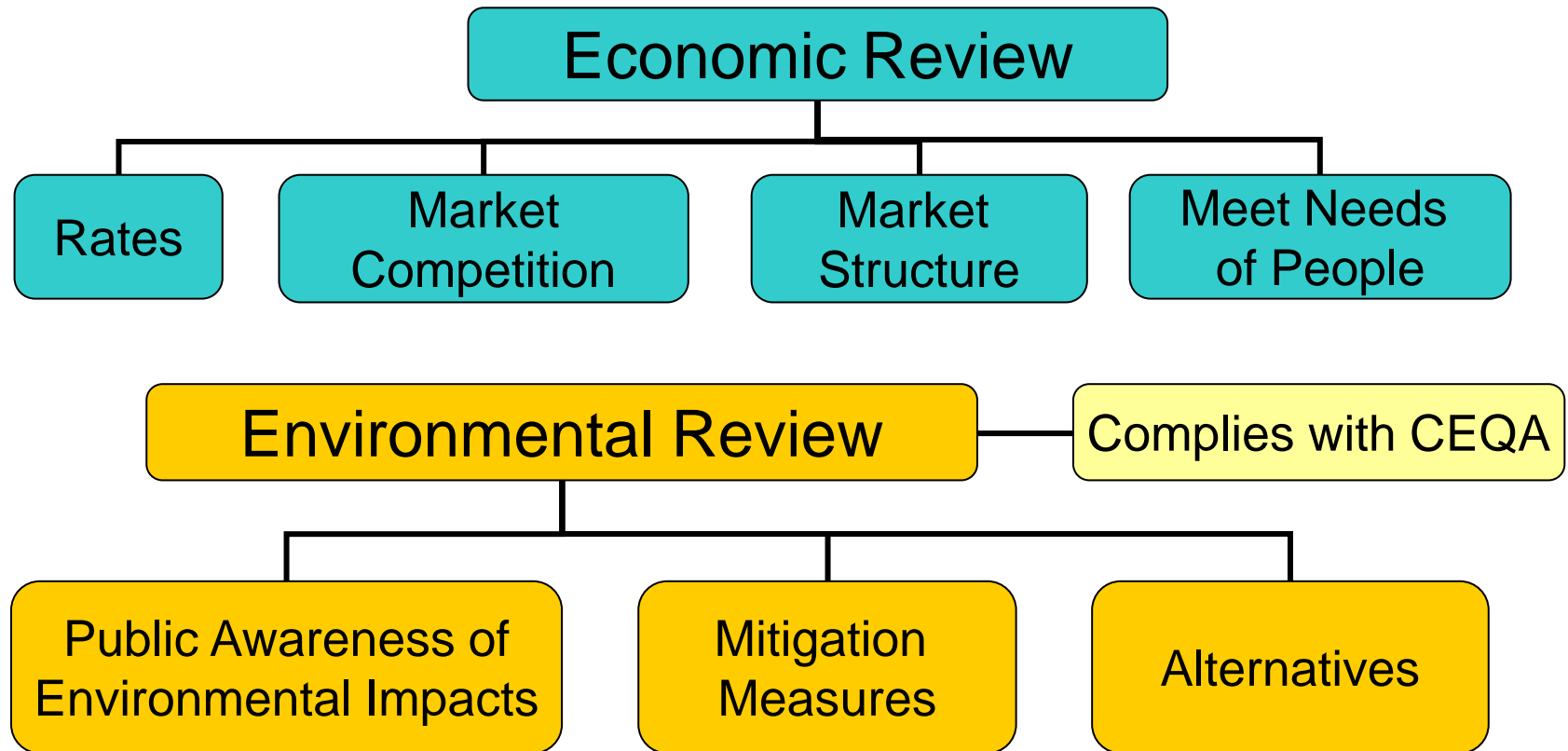


Permit to Construct



CPUC Review Process

E-8



Application & Environmental Review Process (Step 1)

Utility Files Application

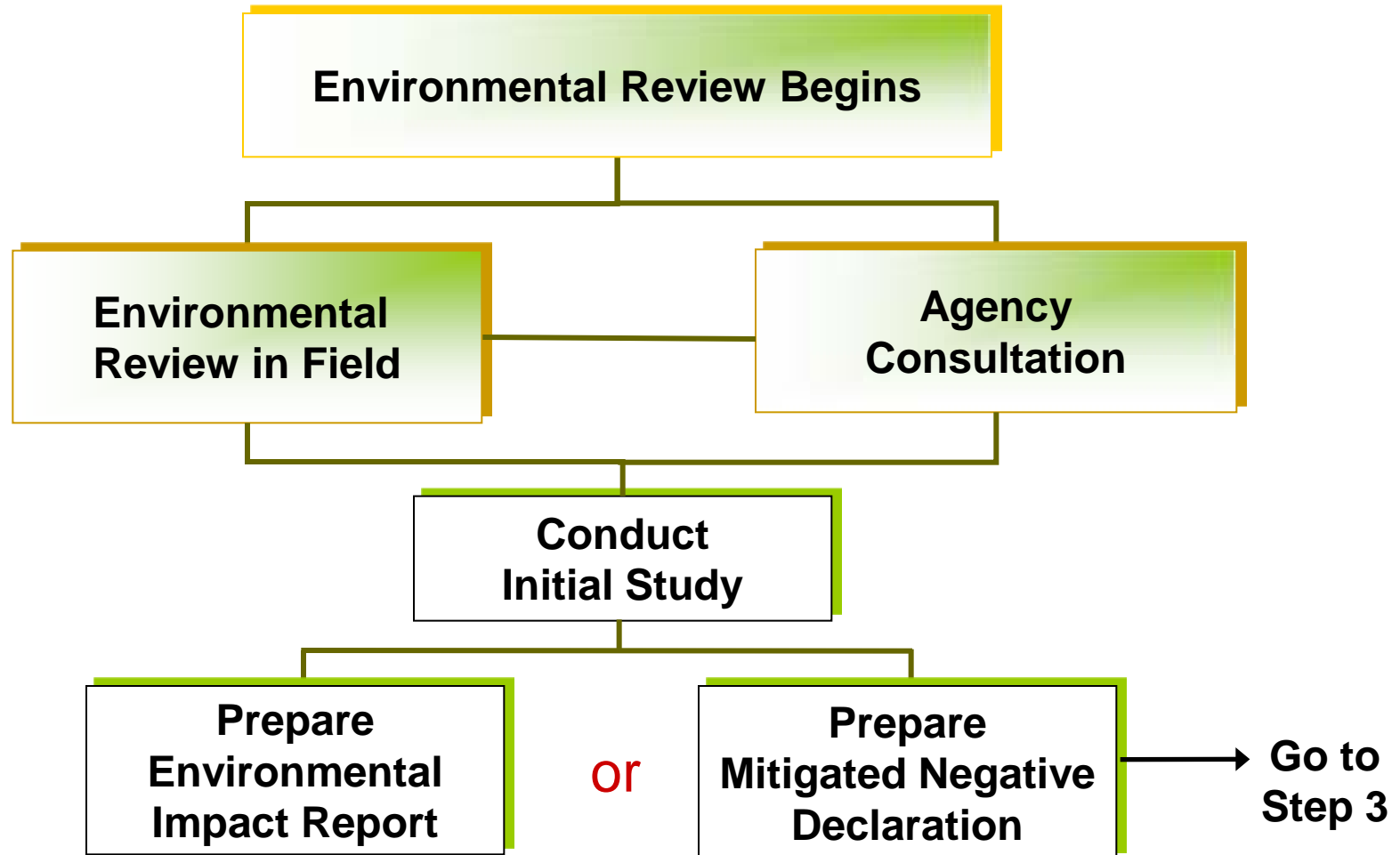
CPUC and its Environmental Consultant Review

**Application
Deemed Complete**

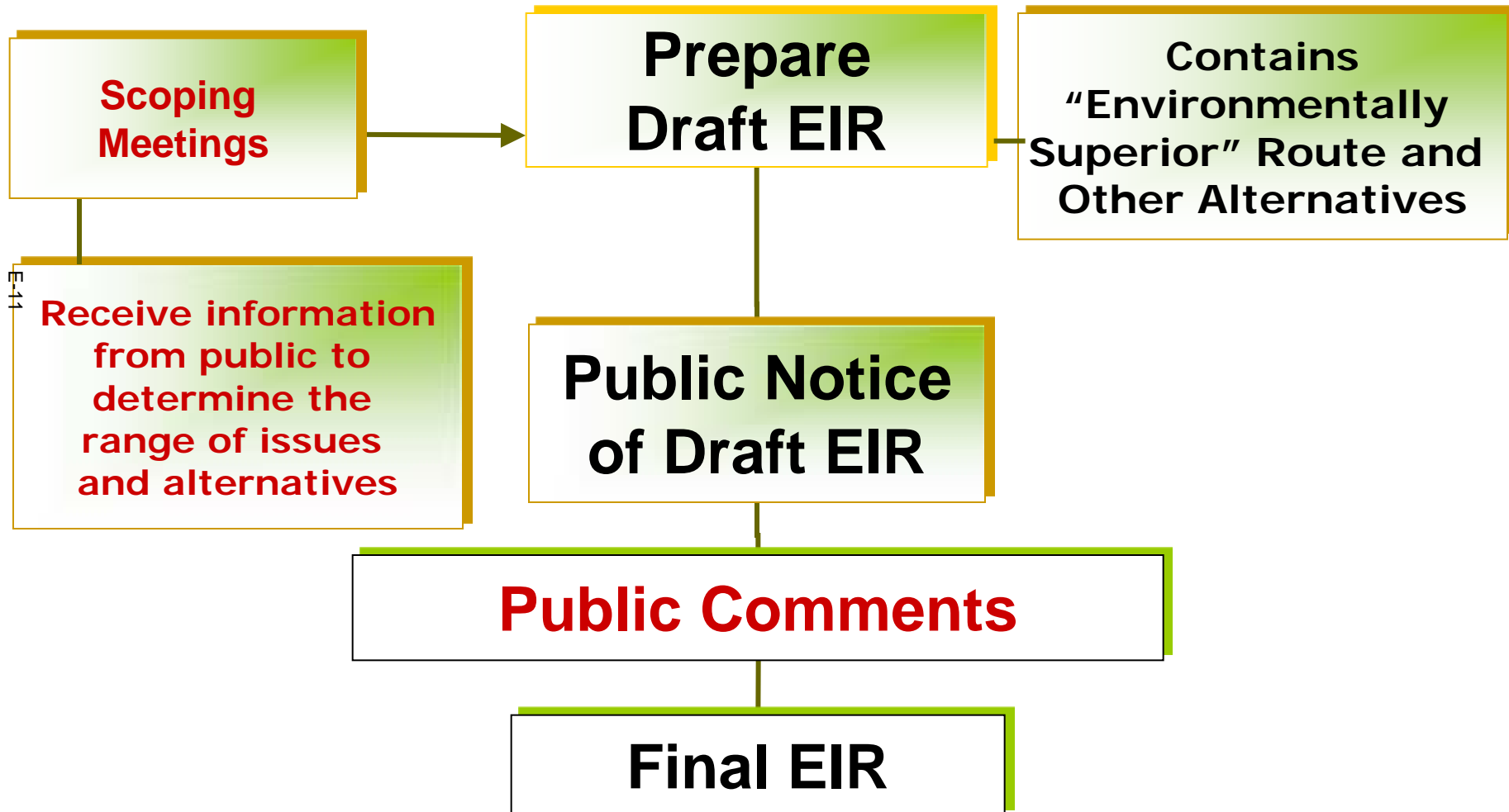
**Environmental
Review Begins**

→ **Go to
Step 2**

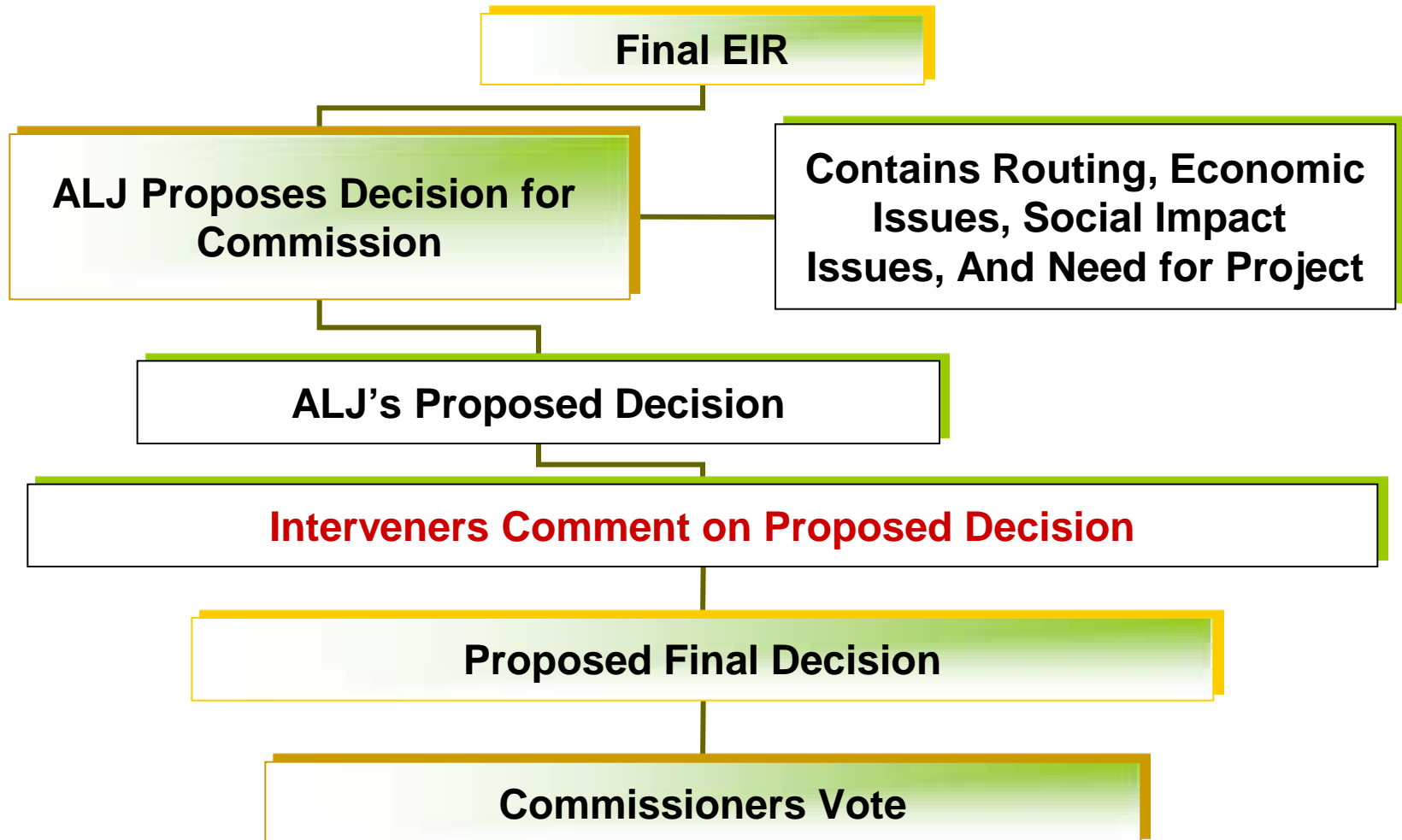
Application & Environmental Review Process (Step 2)



Application & Environmental Review Process (Step 3)



Application & Environmental Review Process (Step 4)



Public Participation

- Environmental Review
 - Scoping
 - Draft EIR

- General Proceeding

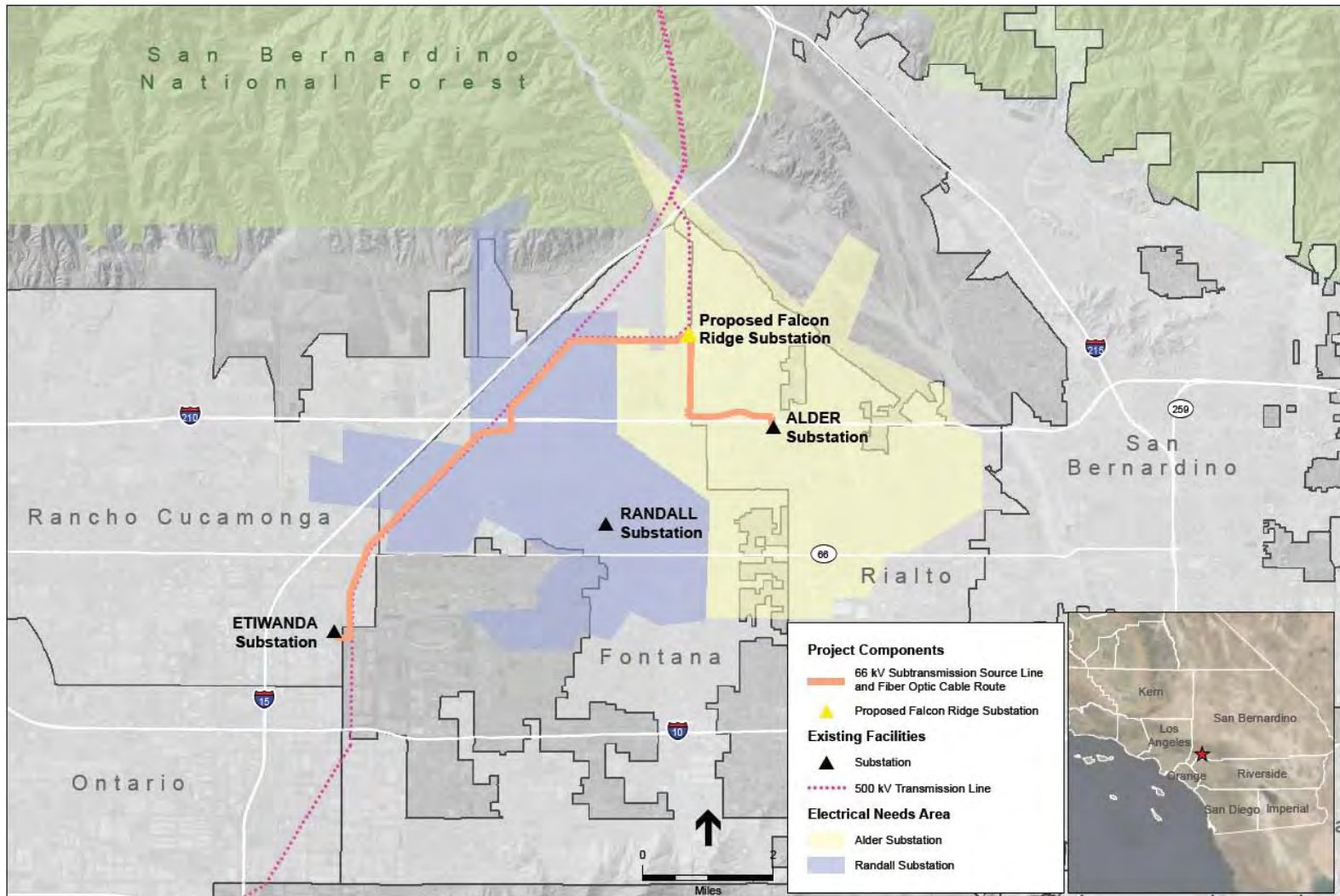
CEQA Context

- CEQA Purposes and Objectives
- What CEQA Does and Does Not Do
- What is an Environmental Impact Report (EIR)?
- Public Participation Process

E-14

Proposed Location

E-15



Project Description

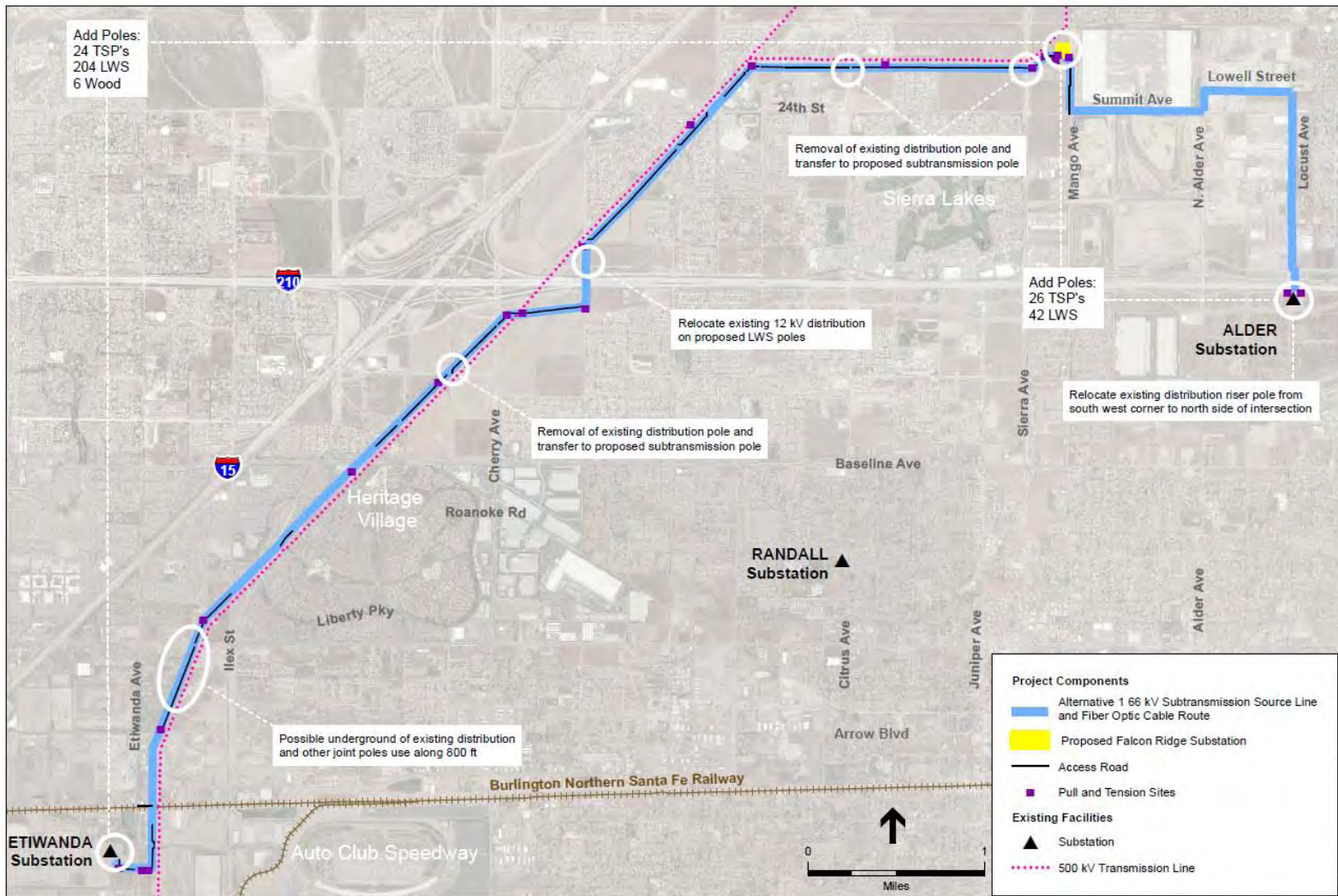
- Purpose and Need
- Components
 - One 66/12 kilovolt (kV) substation
 - Three underground 12 kV distribution getaways
 - Two 66/12 kV subtransmission line segments
 - New and upgraded fiber optics to connect the new substation to SCE's existing system

Falcon Ridge Substation Draft EIR

- Organization
- Impacts and Mitigation Measures
- Project Alternatives
 - Lowell Street Realignment Alternative
 - No Project Alternative
 - Alternatives Considered but Rejected for Detailed Analysis in the EIR

Environmentally Superior Alternative

E-18



How to Comment on the Draft EIR

Mr. John Boccio
Falcon Ridge Substation Project
c/o Environmental Science Associates
225 Bush Street, Suite 1700
San Francisco, CA 94104
Fax: (415) 896-0332
E-mail: falconridge@esassoc.com

Website:

<http://www.cpuc.ca.gov/Environment/info/esa/falconridge/index.html>

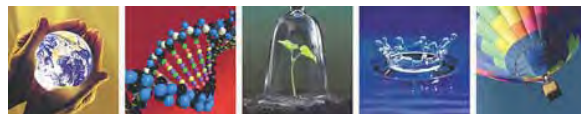
Deadline: March 12, 2012

Public Comments

APPENDIX F

Final Remedial Investigative Report, B.F. Goodrich Site

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Final
Remedial Investigation Report
B.F. Goodrich Site
Rialto, California

Prepared for:
**United States Environmental Protection
Agency-Region 9
San Francisco, California**

On behalf of:
**Emhart Industries, Inc.
Towson, Maryland**

Prepared by:
**ENVIRON International Corporation
Irvine, California**

Date:
February 2010

Project Number:
04-10801A

Prepared by:

ENVIRON International Corporation
18100 Von Karman Avenue, Suite 600
Irvine, California 92612
(949) 261-5151

Nicholas Steenhaut, PE (72813)
Senior Associate

George O. Linkletter, PhD, PG (3728)
Principal and Senior Vice President

Contents

	Page
Preface	v
Executive Summary	ES-1
1 Introduction	1
1.1 Objective	1
1.2 Site Background	1
1.2.1 Site Description	1
1.2.2 Site History	1
1.3 Physical Characteristics Of The Study Area	2
1.3.1 Surface Features	2
1.3.2 Climate	2
1.3.3 Surface Water Hydrology	2
1.3.4 Hydrogeology	3
1.3.4.1 Hydrostratigraphy	3
1.3.4.2 Basin Recharge	4
2 ENVIRON Site Investigations	5
2.1 Constituents of Concern	5
2.2 Study Areas	5
2.3 Chronology	5
2.3.1 2004 RI	5
2.3.2 2006 RI	5
2.3.3 2007 RI	6
2.3.4 2009 RI	6
2.4 Identifying and Locating Potential Source Areas	6
2.5 Sampling Rationale	7
2.6 Soil and Soil Gas Investigations	7
2.7 Groundwater Investigation	8
2.8 Waste Handling	8
3 Chronology of Other Investigations	9
3.1 APE Perchlorate Investigation (PES, 2003)	9
3.2 PSI Perchlorate Investigation (Kleinfelder, 2003)	9
3.3 APE Supplemental Perchlorate Investigation (PES, 2004)	9
3.4 Wong Chung Ming Preliminary Perchlorate Soil Investigation (Locus, 2004)	9
3.5 Goodrich Remedial Investigation (Geosyntec, 2005)	9
3.6 PSI McLaughlin Pit Investigation (Kleinfelder, 2005a)	10
3.7 Engle Property Perchlorate Assessment (Kleinfelder, 2005b)	10
3.8 PSI Monitoring Well Installation (Adverus, no report issued yet)	10
3.9 "Pyrotechnic Dud Round" Investigation (BBL, 2005 / Kleinfelder, 2008)	10
3.10 USEPA Investigation of Goodrich Burn Pits (no report issued yet)	11
4 Study Areas with Known or Suspected WCLC Activity	12
4.1 Introduction	12
4.2 Soil and Soil Gas Data	12
4.2.1 Study Area 18	12

4.2.2	Study Area 13	13
4.2.3	Study Area 11	13
4.2.4	Study Area 37	14
4.2.5	Study Area 4	14
4.2.6	Study Area 5	14
4.2.7	Study Area 7	15
4.2.8	Study Area 8	15
4.2.9	Study Area 9	15
4.2.10	Study Area 10	15
4.2.11	Study Area 14	16
4.2.12	Study Area 15	16
4.2.13	Study Area 16	16
4.2.14	Study Area 17	16
4.2.15	Study Area 19	17
4.2.16	Study Area 21	17
4.2.17	Study Area 23	17
4.2.18	Study Area 24	17
4.2.19	Study Area 25	18
4.2.20	Study Area 29	18
4.2.21	Study Area 30	18
4.2.22	Study Area 31	18
4.2.23	Study Area 38	19
4.2.24	Study Area 39	19
4.2.25	Study Area 40	19
4.2.26	Study Area 42	19
4.2.27	Study Area 43	19
4.2.28	Study Area 44	20
5	Other Study Areas	21
5.1	Introduction	21
5.2	Soil and Soil Gas Data	21
5.2.1	Study Area 46	21
5.2.2	Study Area 50	21
5.2.3	Study Area 47	22
5.2.4	Study Area 33	22
5.2.5	Study Area 48	22
5.2.6	Study Area 45	23
5.2.7	Study Area 22	23
5.2.8	Study Area 6	23
5.2.9	Study Area 28	24
5.2.10	Study Area 32	25
5.2.11	Study Area 12	25
5.2.12	Study Area 34	25
5.2.13	Study Area 36	25
5.2.14	Study Area 1	26
5.2.15	Study Area 2	26
5.2.16	Study Area 3	26

5.2.17	Study Area 20	26
5.2.18	Study Area 26	27
5.2.19	Study Area 27	27
5.2.20	Study Area 35	27
5.2.21	Study Area 41	27
5.2.22	Study Area 49	27
6	Site Groundwater Data	29
6.1	PW-01	29
6.2	PW-02	29
6.3	PW-03	29
6.4	PW-04	29
6.5	CMW-01	30
6.6	CMW-02	30
6.7	CMW-03	30
6.8	CMW-04	30
6.9	CMW-05	31
6.10	SB-CML-01	31
6.11	Study Area 13	31
7	Recommended Further Investigations	32
8	Summary And Conclusions	33
8.1	Summary	33
8.2	Conclusions	33
9	References	34

List of Tables

Table 1:	Perchlorate Soil Data
Table 2:	TCE Soil and Soil Gas Data
Table 3:	Perchlorate and TCE Groundwater Data
Table 4:	Groundwater Elevation Data

List of Figures

Figure 1:	Site Vicinity Map
Figure 2:	Study Area and Sampling Location Overview
Figure 3:	Chronology of ENVIRON Investigations
Figure 4:	Study Areas of Known or Suspected WCLC Activity–Soil and Soil Gas Sampling Locations
Figure 5:	Other Study Areas – Soil and Soil Gas Sampling Locations
Figure 6:	Monitoring Well Locations

List of Appendices

- Appendix A: 2004 ENVIRON Work Plan
- Appendix B: 2006 ENVIRON Work Plan
- Appendix C: 2009 ENVIRON Work Plan
- Appendix D: ENVIRON Shallow Soil Boring Logs
- Appendix E: ENVIRON Trench Schematics
- Appendix F: ENVIRON Deep Soil Boring and Well Logs
- Appendix G: Geophysical Logs for ENVIRON Well Locations
- Appendix H: ENVIRON Geotechnical Data
- Appendix I: ENVIRON Laboratory Reports – Soil Data
- Appendix J: ENVIRON Level III Data Validation Reports
- Appendix K: Laboratory Reports – ENVIRON Soil Gas Data
- Appendix L: Laboratory Reports – ENVIRON Grab Groundwater Data
- Appendix M: Laboratory Reports – ENVIRON Groundwater Data
- Appendix N: ENVIRON Well Permits

Preface

This Remedial Investigation (RI) Report has been produced pursuant to the requirements of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation, CERCLA Docket 2009-01, dated March 17, 2009 (AOC) entered into between Emhart Industries, Inc (EII) and the United States Environmental Protection Agency, Region IX (USEPA). Section 38.e. of the AOC requires this RI Report to include the data from ENVIRON International Corporation's (ENVIRON) field work in 2009 and data from ENVIRON's previous site investigations in 2004, 2006, and 2007. In addition, pursuant to an oral request made by Mr. Wayne Praskins (USEPA), the data from previous investigations by other parties at the B.F. Goodrich Site (Site) also have been included.

Since its inception, the principal focus of ENVIRON's work at the Site has been to investigate all known or suspected West Coast Loading Corporation (WCLC) perchlorate use areas, as well as any alleged WCLC trichloroethene (TCE) use areas. From time to time, this scope was expanded at the request of the USEPA and the Regional Water Quality Control Board – Santa Ana Region (Regional Board) to include certain use areas of other Potentially Responsible Parties (PRPs) at the Site, including the McLaughlin Pit, the Goodrich Burn Pits, and the Southwest Disposal Pits.

This RI report presents in three categories: "Study Areas with Known or Suspected WCLC Activity," "Other Study Areas," and "Site Groundwater Data." The first two categories include soil and soil gas data organized area-by-area. It is important to recognize, however, that due to the complex use history of the Site, often with multiple parties operating in the same areas over time, not all data in an area of known or suspected WCLC activity are attributable to WCLC historical activities.

Executive Summary

To date, 50 Study Areas have been investigated at the B.F. Goodrich Site for the presence of perchlorate and/or trichloroethene (TCE), the two constituents of concern based on the groundwater basin's analytical profile. ENVIRON International Corporation (ENVIRON), working on behalf of Emhart Industries, Inc. (EII) has performed the bulk of the investigation work at the Site, focusing predominantly on those 28 areas where West Coast Loading Corporation (WCLC) is known or suspected of having used a constituent of concern. Of the 28 study areas, perchlorate was detected in four areas; no TCE was detected. The perchlorate detections in these four areas have been bounded by an extended series of consecutive non-detect results (i.e. 18, 13, 11, and 37). There has been no release or threatened release of TCE in the WCLC operations area.

Of the remaining 22 study areas, where WCLC is not known or suspected of having used a constituent of concern, 13 study areas have perchlorate detections. In many of these study areas, the nature and extent of perchlorate, and, in the case of Study Area 45, TCE contamination, have not been fully characterized. In addition, data from groundwater monitoring wells downgradient of some of these areas demonstrate that the underlying groundwater resource has been impacted, as evidenced by historically elevated perchlorate and TCE detections, with values as high as 10,000 parts per billion (ppb) for perchlorate (PW-2), and 1,500 ppb of TCE (CMW-2).

At the request of the United States Environmental Protection Agency – Region IX (USEPA), as set forth in AOC 2009-01, this RI report presents all known perchlorate and TCE data collected at the Site. Where available, additional information has been included by way of Appendices, such as in the case of ENVIRON's 2006, 2007 and 2009 Remedial Investigation (RI) data. Examples include geotechnical data, geophysical logs, and data validation reports.

1 Introduction

1.1 Objective

This Remedial Investigation (RI) Report presents the technical approach and rationale for the 2004, 2006, 2007, and 2009 ENVIRON International Corporation (ENVIRON) soil, soil gas, and groundwater investigations at the property known as the "B.F. Goodrich Site" (Site) in Rialto, California, as well as the combined results of these investigations and all previous investigations by other parties on the Site. This report was prepared by ENVIRON, on behalf of Emhart Industries, Inc. (EII), as set forth in AOC¹ 2009-01.

1.2 Site Background

1.2.1 Site Description

The Site is located in northern Rialto in San Bernardino County, California (Figure 1). It occupies an area of approximately 160 acres in the northern portion of the Rialto-Colton Groundwater Basin. The Site is bounded by Casa Grande Drive to the north, Locust Avenue to the east, the extension of Summit Avenue to the south, and Alder Avenue to the west. A large part of the southern portion of the Site is currently occupied by Rialto Concrete Products (RCP). The northern portion of the Site is owned by Mr. Wong Chung Ming, and is currently being leased by Pyro Spectaculars, Inc. (PSI) and American Promotional Events (APE) – West. Figure 1 shows a site map with the locations and/or use boundaries of entities currently operating at the Site.

1.2.2 Site History

The Site was first developed as part of the approximately 2,800-Acre Rialto Ammunition Back-Up Storage Point (RABSP) for the United States Army during World War II. After the war, the RABSP was declared surplus and transferred to the custody of the Farm Credit Administration (SAIC, 2004). From June 1952 to January 1957, West Coast Loading Corporation (WCLC) operated on approximately 28 acres of the Site, loading, assembling, and testing various types of devices, only three of which contained perchlorate, i.e. ground burst simulators, photoflash cartridges, and XF5A cartridges (WCLC records); the production period for these three products was confined to a thirteen month period. From circa 1957 until circa 1963, B.F. Goodrich (Goodrich) performed rocket motor and propellant research and development, and produced propellant loaded rocket motors at the Site. Goodrich used and disposed of perchlorate and TCE during its tenure on the Site. Since Goodrich's departure in 1963, the Site has been occupied continuously by various fireworks and pyrotechnic companies, including but not limited to United Fireworks, Pyrotronics Corporation, PSI, Astro Pyrotechnics, Inc., Trojan Fireworks, Zambelli Fireworks Manufacturing Company, Apollo Manufacturing, Red Devil Fireworks Holding Corporation, Red Devil Fireworks Company, Clipper Fireworks Company, California Fireworks, Pyrodyne American Corporation, APE, Inc., and APE-West. These fireworks companies used and disposed of perchlorate during their respective tenures at the Site.

¹ Administrative Settlement Agreement and Order on Consent for Remedial Investigation, CERCLA Docket 2009-01, dated March 17, 2009.

1.3 Physical Characteristics Of The Study Area

1.3.1 Surface Features

In general, the landforms of the project area reflect both the climate and recent geologic evolution of the eastward stepping San Andreas Fault System. The San Andreas Fault System has brought four basement blocks into juxtaposition, the San Gabriel, San Bernardino, and San Jacinto Mountains, along with the Perris fault block. The surface of the project area itself is part of a broad alluvial fan deposited by Lytle and Cajon Creeks upon older sedimentary assemblages that lie atop a basement block believed to be of San Jacinto composition. These sediments were shed from the San Gabriel and San Bernardino blocks, which have been uplifted along former splinters of the San Andreas Fault System, as well as antithetic faults such as the Cucamonga, to form the bordering highlands to the north of the project area.

Although the Site lies atop a large alluvial fan, no watercourses presently pass through it, though the generally dry Lytle Creek Wash is present slightly less than one mile to the north. The west bank of Lytle Creek is generally formed of an elongated escarpment of low hills, the Bunker Hill Dike, which is thought to be the surface expression of the San Jacinto Fault, one of the most active faults in California.

There are two surface water bodies in proximity to the Site, the Linden Ponds, less than a mile to the east, and the Cactus Basin, which lies approximately 6 miles to the southeast. Both of these features have been used for artificial recharge of the Rialto-Colton Basin aquifers. Surface water flow from storms in the project area generally occurs as sheetwash and minor channelized flow on the 2 to 3 percent grade that slopes to the south and southeast. (GLA, 2005)

1.3.2 Climate

Southern California is characterized as having a Mediterranean type climate with mild winters and hot summers. In addition, the climate in southern California can generally be characterized as long relatively dry periods interrupted by El Niño events that bring notably higher precipitation to the area. For the period 1945 to 1998, the average annual rainfall in the San Bernardino area was 15.91 inches (Danskin, et al, 2005). Potential evapotranspiration in the semi-arid San Bernardino area amounts to an average of 76 inches per year, nearly five times the average annual precipitation. (Danskin, et al, 2005)

1.3.3 Surface Water Hydrology

The predominant surface water features in the area, in order of proximity and potential relevance, are Lytle Creek and Cajon Creek, which drain into the Santa Ana River, which, in turn, crosses the Rialto-Colton Basin at its southeastern end.

As discussed in Section 1.3.4, the hydrogeology of the Rialto-Colton Basin is highly dependent upon the surface water hydrology inasmuch as direct surface infiltration of precipitation has been demonstrated by many recent studies to be a de minimis source of aquifer recharge (Dutcher and Garrett, 1963; GLA, 2005; Danskin, et al, 2005). The large but temporally isolated flows of Lytle Creek have long been recognized as the most significant source of recharge to the Rialto-Colton Basin (Dutcher and Garrett, 1963; GLA, 2005; Danskin, et al, 2005; Geosyntec, 2006). Recharge associated with the Santa Ana River affects the lower Rialto-

Colton Basin adjacent to the Santa Ana River, but does not affect the northern portion of the basin.

1.3.4 Hydrogeology

The Rialto-Colton Basin is an approximately 30 square mile structural basin lodged in a complex region floored by four crustal blocks juxtaposed along regional through-going fault systems composed of many splays and splinters. The Site is believed to be underpinned by a downfaulted block of San Jacinto composition. The structural origin of the region, and therefore the Rialto-Colton Basin, is a matter of some debate, but in general is related to the eastward stepping right-lateral San Andreas Fault System. These faults are a major influence on groundwater flow in the Rialto-Colton Basin.

1.3.4.1 Hydrostratigraphy

The earliest sediments deposited on the basement block surface are consolidated non-marine continental deposits consisting of well-cemented gravels, sands, silts, and clays. These rocks are considerably deformed, cemented, and generally barren of groundwater. Overlaying these rocks are the only slightly deformed and low-producing (limited specific capacity) beds of the continental San Timoteo Formation.

A period of intense middle Pleistocene tectonism associated with movement on the San Andreas Fault System produced a flood of basinal sediments comprising the Older Alluvium, which hosts the primary producing aquifers of both the Chino and Rialto-Colton basins. Tectonism and deposition of the Older Alluvium were contemporaneous, creating both the aquifer itself, as well as the basin boundary faults, such that movement along these faults has affected earlier depositional units of the Older Alluvium (thought to host the Regional Aquifer) more than younger units. Therefore these faults, and their splays, tend to form better hydraulic barriers with depth, depending upon the age of initiation of the faults.

The Younger Alluvium overlies the Older Alluvium and is uncut by most faults, however it may be cut by the San Jacinto Fault based on the presence of the Bunker Hill dike described in Section 1.3.1.

Dutcher and Garrett (1963) established the initial hydrostratigraphy of the Rialto-Colton Basin, primarily from water well drillers logs and petroleum exploration borehole logs. Woolfenden and Kadhim (1997) refined the hydrostratigraphy of the Older Alluvium into three water-bearing units, the upper, middle, and lower. Geo-Logic Associates (GLA, 1998) subdivided Woolfenden and Kadhim's (1997) middle water-bearing unit into three intermediate aquifers in the area around the Site, which they define as the A, B, and C zones:

- A-zone: 300-330 feet below ground surface (bgs), unconfined
- B-zone: 350-485 feet bgs, confined
- C-zone: >500 feet bgs, deep, regional, confined

GLA (2007) indicated that the A zone has gone dry and that the B zone is believed to be perched atop an aquitard that is present beneath the Site, but pinches out in the vicinity of Rialto

Municipal Airport. It is from the C zone aquifer that most municipal water is withdrawn in the Rialto-Colton Basin.

Additional information regarding the hydrostratigraphy and lithology at the Site was obtained during ENVIRON's remedial investigations and has been included in the appendices of this Report. Appendix D contains the shallow soil boring logs, Appendix E contains trench schematics, Appendix F contains the stratigraphy and well construction information of the two monitoring wells installed by ENVIRON (CMW-04 and CMW-05) as well as the boring logs for all borings deeper than 75 ft, Appendix G contains Geophysical Logs for CMW-04, CMW-05, and CML-01, and Appendix H contains the geotechnical data obtained from selected soil samples collected at the Site.

1.3.4.2 Basin Recharge

Dutcher and Garrett (1963), Woolfenden and Kadhim (1997), Woolfenden and Koczot (2001) and GLA (2007) have presented water budget estimates for recharge and flux for groundwater basin modeling purposes in the Rialto-Colton Basin. Dutcher and Garrett (1963) suggested that a significant amount of recharge is likely to be attributed to precipitation and snow-melt runoff events channeled down Lytle Creek, which has a portion of its surface overlying the northern or northeastern corner of the Rialto-Colton Basin. Dutcher and Garrett (1963) state that "Lytle Creek is the principal source of recharge to the north half of Rialto-Colton basin" (p.88) (see also Danskin, et al, 2005).

2 ENVIRON Site Investigations

2.1 Constituents of Concern

As stipulated in the 2006 Work Plan (Appendix B), the primary Constituents of Concern (COCs) identified as materially affecting groundwater quality are the perchlorate anion and the volatile organic compound (VOC) TCE. ENVIRON's 2004 RI focused on the presence of perchlorate and TCE in soil and soil gas. ENVIRON's 2006 RI focused on the presence of perchlorate in soil and groundwater and TCE in soil gas, soil, and groundwater. ENVIRON's 2007 and 2009 RIs focused solely on the presence of perchlorate in soil². To date, ENVIRON has collected over 1,000 soil, soil gas and groundwater samples at the Site for analysis of perchlorate and/or TCE.

2.2 Study Areas

For purposes of uniformity, ENVIRON has adopted an alphanumeric designation system for the study areas investigated at the Site. Currently, investigations have occurred at 50 individual study areas on the Site. This allows for a standardized approach and alleviates the need to use multiple area designations depending on the investigating party. Figure 2 shows the 50 study areas and all sampling locations on the Site. Since the study area number system post-dates the majority of the sampling at the Site, the area boundaries are generally drawn as rectangular boxes, inclusive of all sampling conducted in the general vicinity of a feature of interest. One notable exception is the sampling performed by Geosyntec in 2004 in the area near the Southwest Disposal Pits (Study Areas 47 and 48), where sample locations missed the actual feature of interest (the pits), to the degree that the study area outline was not expanded to include these points.

2.3 Chronology

2.3.1 2004 RI

On behalf of EII, in 2004, ENVIRON completed a site investigation that involved the sampling of soil and soil gas. The investigation was requested and the sampling locations selected by the USEPA, as described by ENVIRON in the 2004 Work Plan (Appendix A). In total, 11 study areas were investigated and 130 soil and soil gas samples were collected. The results of this investigation were previously reported in the February 10, 2005 Site Investigation Report (ENVIRON, 2005). Sampling locations from the 2004 RI are shown on Figure 3.

2.3.2 2006 RI

The principal objective of the 2006 RI was to investigate the shallow soil and soil gas in all areas of recognized or suspected WCLC perchlorate and/or alleged WCLC TCE use at the Site, and to bound any detections encountered. The USEPA and Regional Board expanded the scope of work in several ways, including adding the investigation of certain areas used by other parties (e.g. McLaughlin Pit, Goodrich Burn Pits, Southwest Disposal Pits), and the installation and monitoring of two wells. In total, 36 study areas were investigated and 450 soil and soil gas samples were collected. Since the 2006 RI, ENVIRON has collected 108 groundwater samples

² In addition, one grab groundwater sample was collected during ENVIRON's 2009 RI.

from its monitoring wells installed during this phase of work. The investigation was performed in accordance with the work plan dated February 21, 2006 (see Appendix B). The results of this investigation were previously summarized in the March 30, 2007 Revised Focused Summary Report (ENVIRON, 2007). Sampling locations from the 2006 RI are shown on Figure 3.

2.3.3 2007 RI

On behalf of EII, ENVIRON initiated the 2007 RI, after new information suggested that full characterization of Study Area 18, a location of known WCLC perchlorate use, required additional sampling. In total, 190 additional soil samples were collected from Study Area 18. The work was performed in accordance with the 2006 Work Plan. The results of this investigation were previously summarized in the Revised Focused Summary Report. Sampling locations from the 2007 RI are shown on Figure 3.

2.3.4 2009 RI

As required by the AOC entered into between EII and USEPA, in 2009 ENVIRON performed additional soil investigation in five study areas. In total, 153 additional samples were collected from a series of deep soil borings and a floor drain. The work was performed in accordance with the 2008 Work Plan (Appendix C). The results of this investigation (together with results from all previous investigations at the Site) are presented in this Report. Sampling locations from the 2009 RI are shown on Figure 3.

2.4 Identifying and Locating Potential Source Areas

The identification of potential WCLC source areas resulted from a cooperative effort among EII, ENVIRON, Environmental Research, Inc. (ERI), the USEPA, and the Regional Board. This process was initiated in 2004 and was subsequently continued in the period preceding the 2006 field investigation, by which time a considerable body of information on historical site operations had become available. During this process, multiple sources of information were reviewed, analyzed, or otherwise considered. The various sources of information included: i) witness deposition testimony and other anecdotal evidence, ii) pertinent historical documents, and iii) historical aerial photographs, including low angle, low altitude obliques. In addition, wherever the USEPA deemed it appropriate, ENVIRON included for further evaluation in its 2006 RI certain WCLC use areas investigated previously during its 2004 work at the Site.

This collective effort made use of all information available at the time to identify the location of all areas where WCLC was known or suspected (regardless of the basis for that suspicion) to have used perchlorate, or suspected (regardless of the basis for that suspicion) of having used TCE. This exercise, combined with the source identification efforts for the 2004 investigation, yielded a list of 28 study areas where there was a basis to believe or suspect that TCE and/or perchlorate may have been used and, therefore, had the potential to be released by WCLC. The rationale for investigating each of these individual areas is described in the work plans prepared for the 2004, 2006, and 2009 investigations, included herein as Appendices A, B, and C, respectively. Combined, the field investigations of ENVIRON's 2004 work and the work conducted under the subsequent 2006, 2007, and 2009 RIs, have comprehensively dealt with each of the 28 study areas under the direction and supervision of USEPA and/or Regional Board staff.

During the 2006 RI, in addition to investigating all areas where WCLC was known or suspected to have used the constituents of concern, a number of other parties' operational and/or use areas were also investigated by ENVIRON at USEPA's request. Examples include the Goodrich Burn Pits (Area 45), the McLaughlin Pit (Area 46), the Southwest Disposal Pits (Areas 47 and 48), and the 150-gallon mixer area (Area 28).

Coordinates for the sample locations were established based on geo-referenced aerial photographs, and checked against the many historical physical features that still exist at the Site today. Specific sample locations were specified in the field by ENVIRON using geodetic coordinates with the aid of a commercial grade backpack-mounted Garmin™ Global Positioning System (GPS) receiver. Prior to initiating the field work, site walks were conducted during which the USEPA and/or Regional Board staff were able to verify, or alter if desired, the locations staked out for field investigation. In addition, in the course of ENVIRON's 2006 field work, numerous additions and or alterations to the Work Plan scope were requested by Regional Board staff, all of which were incorporated by ENVIRON.

To deal with those portions of the Site where few historical features exist today, the USEPA and ENVIRON established an expanded sampling area during the 2004 field investigation to account for the uncertainty in location of several suspect former use areas. Subsequently, in 2006, and again in 2009, the USEPA requested further sampling from those areas where it judged additional sampling coverage might be informative. In addition, draft versions of the 2006 and 2009 Work Plans were submitted to the Regional Board and the USEPA for comments prior to being finalized, to allow interested parties the opportunity to raise questions regarding its content, including sampling rationale and locations. With respect to the 2009 Work Plan, on April 6, 2009, ENVIRON responded to comments submitted by the Regional Board, Geosyntec (on behalf of Goodrich), SES (on behalf of the City of Rialto), and the County of San Bernardino.

2.5 Sampling Rationale

The sampling rationale for all areas investigated during the ENVIRON 2004, 2006, 2007, and 2009 RIs are listed in the Work Plans included in this report as Appendices A, B and C.

2.6 Soil and Soil Gas Investigations

Soil boring and soil gas probe locations, depths of samples, sampling rationale, access, sampling procedures, equipment decontamination, and sample analyses procedures were detailed in the 2006 and 2008 Work Plans. ENVIRON conducted its work at the Site in general conformance with the provisions of these Work Plans, which were prepared consistent with the National Oil and Hazardous Substance Pollution Contingency Plan (NCP). For some areas the number, type, and location of the samples were subsequently altered at the request of Regional Board or USEPA staff. During the 2009 RI, at 3 boring locations in Study Areas 11, 13, and 37, ENVIRON extended the sampling depth beyond what was specified in the 2008 Work Plan in order to bound the extent of the encountered contamination.

Soil and soil gas sampling areas in the 2004, 2006, 2007, and 2009 RIs are shown on Figure 3. The specific sampling locations were selected in consultation with and the approval of the Regional Board and/or USEPA, and in coordination with the current owners/operators of the respective properties.

After sampling locations were confirmed in the field by Regional Board and/or USEPA staff, ENVIRON notified Underground Service Alert (USA) regarding the drilling and sampling locations. In addition, ENVIRON retained the services of Spectrum Geophysics (Spectrum) of San Fernando, California to conduct a geophysical survey at each sampling point. This task was performed to minimize the possibility of damaging subsurface utilities encountered during the investigation. Based on the results of the geophysical survey, individual sampling points in several sampling areas were moved small distances (1 to 2 feet).

Site-specific Health and Safety Plans (HASPs) were prepared to minimize exposure of ENVIRON field personnel to potentially hazardous materials and daily tailgate safety meetings were conducted with all on-site ENVIRON and subcontractor staff.

2.7 Groundwater Investigation

The 2006 Work Plan called for the installation of five triple-completion monitoring wells. Three of these were installed by Adverus on behalf of PSI; ENVIRON installed the remaining two wells on behalf of EII. The locations of the monitoring wells were established in conjunction with Regional Board staff, and are presented on Figure 6. In addition to the two ENVIRON monitoring wells, the Work Plan also called for the installation of at least one intermediate depth boring to 200 ft, with the option of extending the boring to groundwater and converting it to a monitoring well, depending on the findings down to 200 ft. This boring was installed through the center of the McLaughlin Pit, and, based on the analytical results over the first 200 ft of soil, the boring was extended to groundwater, where a number of grab groundwater samples were collected. The subsequent effort to install a clustered monitoring well at this location was unsuccessful and the borehole was grouted up. Boring logs and well construction details for the wells installed by ENVIRON can be found in Appendix F.

2.8 Waste Handling

Investigation derived waste, including equipment decontamination rinse water, used personal protective equipment (PPE), and purge water and/or soil cuttings, were placed in Department of Transportation (DOT)-approved 55-gallon drums or in roll-off bins. The drums and bins were sealed and labeled, and stored at a secure location at the Site. Sampling for the purpose of waste profiling was conducted and the waste was disposed of at an appropriate off-site location.

3 Chronology of Other Investigations

Environmental investigations have been performed on behalf of numerous current and former owners and tenants of the Site and its immediate vicinity. These investigations, which have focused on perchlorate and TCE, have been conducted at the request of USEPA and/or the Regional Board, and in one case, the Department of Toxic Substances Control (DTSC). The following is a brief summary of all other investigations known to ENVIRON to have been conducted at the Site. Results of these investigations are included in the data discussion in Sections 4 and 5.

3.1 APE Perchlorate Investigation (PES, 2003)

On behalf of APE, and at the request of the Regional Board, PES Environmental, Inc. (PES) performed an investigation to evaluate whether perchlorate was discharged at areas where APE stored or handled fireworks. Trenches were installed at 15 sampling locations during the PES investigation. These locations fall within Study Areas 3, 22, 28, and 34. Soil samples were generally collected at 2 and 8 feet below ground surface (bgs) at each location. All samples were analyzed for perchlorate, with selected samples also analyzed for VOCs. Sampling took place from March 11 through March 13, 2003.

3.2 PSI Perchlorate Investigation (Kleinfelder, 2003)

On behalf of PSI, and in response to the Regional Board investigation order issued on October 7, 2002, Kleinfelder conducted an investigation to evaluate whether PSI's activities at the Site resulted in the release of perchlorate to the ground surface adjacent to certain storage and production areas. On November 6, 2003, Kleinfelder excavated three trenches to a depth of approximately 10 ft bgs, and collected soil samples from depths of 1, 5, and 10 ft bgs.

3.3 APE Supplemental Perchlorate Investigation (PES, 2004)

At the request of the Regional Board, PES, on behalf of APE, performed an investigation to further characterize the lateral and vertical extent of perchlorate in soil at Area 22. One trench was excavated for this study. On December 15, 2003, PES collected a total of eight soil samples and one duplicate soil sample from four locations within the trench. All samples were submitted for perchlorate analysis.

3.4 Wong Chung Ming Preliminary Perchlorate Soil Investigation (Locus, 2004)

On behalf of Wong Chung Ming, and at the request of the Regional Board, Locus Technologies (Locus) conducted soil sampling to investigate potential perchlorate releases. From March 9 through March 11, 2004, Locus collected soil samples from 11 study areas, typically at depths of 1, 5, 10, and 15 ft bgs; ten of those locations were immediately adjacent to clarifier outfalls and one location was at an apparent "disposal pile." All samples were submitted for perchlorate analysis. Selected samples were also submitted for metals and VOC analyses.

3.5 Goodrich Remedial Investigation (Geosyntec, 2005)

On behalf of Goodrich, and at the request of the USEPA and the Regional Board, Geosyntec Consultants, Inc. (Geosyntec) conducted soil gas and soil sampling investigations at various

locations at and in the vicinity of the Site. From May 18 through June 9, 2004, Geosyntec collected 12 soil samples from eight locations on the Site, as well as 115 soil gas samples from 61 locations. In addition, four monitoring wells were installed on or in the immediate vicinity of the Site.³

3.6 PSI McLaughlin Pit Investigation (Kleinfelder, 2005a)

On behalf of PSI, and at the request of the Regional Board, Kleinfelder conducted an initial perchlorate investigation at the McLaughlin Pit. The investigation consisted of collecting 11 samples from five 4 to 5 ft deep trenches, and two 20 ft deep borings. The sampling took place on December 22, 2004 and on January 5, 2005; samples were analyzed for perchlorate only.

3.7 Engle Property Perchlorate Assessment (Kleinfelder, 2005b)

On behalf of Lowell Locust, LLC, and at the request of the Regional Board, Kleinfelder conducted limited shallow soil sampling on a property known as the 'Engle Property,' partially located on the Site. Six of the 38 soil samples collected during this investigation were located on the Site; the remaining 32 samples were collected from a parcel south of the Site. Sampling took place on January 13, 2005. The samples were collected at depths ranging from 6 inches to 1 foot bgs using a hand trowel, and analyzed for perchlorate.

3.8 PSI Monitoring Well Installation (Adverus, no report issued yet)

On behalf of PSI, and at the request of the Regional Board, Adverus Inc. (Adverus) installed three multi-screen monitoring wells at the Site (CMW-01 through CMW-03) as described in the 2006 Work Plan. During the installation of the wells, between March and June 2006, Adverus collected 70 soil samples, and 28 grab groundwater samples from these three locations.

3.9 "Pyrotechnic Dud Round" Investigation (BBL, 2005 / Kleinfelder, 2008)

On behalf of National Construction Rentals (NCR) and Edward Graves & Associates (EG&A), and at the request of the DTSC, Blasland Bouck & Lee, Inc. (BBL) and Kleinfelder conducted several rounds of soil and soil gas investigation consisting of trench/pothole excavation and the advancement of soil borings in Study Area 50, the location of a former Broco facility, where explosive magazines and underwater welding and cutting rods were manufactured. From 2005 through 2008, 145 soil samples were collected and analyzed for perchlorate and 4 samples were analyzed for TCE.

³ In 2006, Goodrich also installed five Westbay® monitoring wells (PW-5 through PW-9) further down gradient of the Site.

3.10 USEPA Investigation of Goodrich Burn Pits (no report issued yet)

On behalf of USEPA, CH2M Hill installed three 100-ft deep soil borings in and around the former Goodrich Burn Pits in Study Area 45. During the installation of the soil borings, between April 27 and May 4, 2009, CH2M Hill collected 33 soil samples, and installed 12 soil vapor probes.

4 Study Areas with Known or Suspected WCLC Activity

4.1 Introduction

Section 4 of this report includes a discussion of all relevant⁴ data collected from study areas where WCLC, based on available historical records, witness statements, forensic evaluation, and USEPA and Regional Board technical staff judgment, is known or suspected (regardless of the basis for that suspicion) to have used perchlorate, or alleged to have used TCE. In certain cases, WCLC is the only party known to have operated in a given study area (e.g. Study Area 18); in other cases, WCLC is one of several parties. In certain cases, WCLC's use of a contaminant⁵ is reasonably well established; in other cases, it is not well supported. Whichever the case may be for a given study area, a brief description of the activities that are known or suspected to have taken place is provided, together with a discussion of the available soil and/or soil gas data for the area. The study areas where WCLC is known or suspected to have used perchlorate and/or TCE, are 4, 5, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 21, 23, 24, 25, 29, 30, 31, 37, 38, 39, 40, 42, 43, and 44. The four study areas where perchlorate was detected are presented at the beginning of Section 4.2, in order of decreasing maximum perchlorate detections, regardless of whether the perchlorate in the area is known to relate to a WCLC activity. The remaining 24 study areas are presented in alphanumeric order. Sample locations for each study area described in this section are shown in Figure 4, analytical sample results for perchlorate in soil and TCE in soil and soil gas can be found in Tables 1 and 2, respectively.

4.2 Soil and Soil Gas Data

4.2.1 Study Area 18

Study Area 18, specifically Building 42, was identified as an area where WCLC filled pyrotechnic devices with photoflash mix that contained perchlorate (SOP I-6, KWKA00013716). Barrels of unknown contents are also visible in historical aerial photos dating back to WCLC's tenure at the Site (UCSB Frame 55: 3705). Based on the known activities and regulator requested analytical testing, the constituents of potential concern associated with WCLC's use of this area are perchlorate and TCE.

In 2006, ENVIRON collected seven soil samples from one boring and two trenches. The samples were analyzed for perchlorate; there were no detections.

In 2007, after additional information had become available regarding locations of potential perchlorate release in this area, 190 additional soil samples collected from 31 borings, two

⁴ The term "relevant" is used to indicate data related to the constituents of concern only, which, based on basin-wide groundwater chemistry, have been identified as perchlorate and TCE. Most investigators performed additional analyses, which will not be discussed in this report. The complete set of analytical data for ENVIRON's 2006, 2007 and 2009 RI is available in the appendices to this report. For complete data sets of other investigations, we refer the reader to the RI reports incorporated by reference in this report.

⁵ The only constituent of concern, in ENVIRON's opinion, of which the use by WCLC is reasonably well established, is perchlorate. There is no plausible evidence that WCLC used TCE at the Site.

angled borings and four trenches were analyzed for perchlorate; there were 32 detections ranging from 20 ppb to 12,000 ppb, the latter at 2 ft bgs.

In 2009, at the request of USEPA, ENVIRON collected 33 soil samples from three additional 100-ft deep borings installed in this study area; results were consistent with previous findings in 2006 and 2007, where the perchlorate is confined to the shallow soils and concentrations decrease rapidly with depth.

Soil gas was analyzed at two locations within the study area; no TCE was detected.

4.2.2 Study Area 13

Study Area 13, specifically Building 40, was identified as an area where WCLC may have weighed and blended photoflash powder (SOP W-4, KWKA00013749 and SOP I-4, KWKA00013720), where United Fireworks may have loaded marine flares with perchlorate (RFDW006298, letter dated October 23, 1968 from United Fireworks to Rialto Fire Department) and where Goodrich may have used rocket propellant (Haggard Deposition, Exhibit 282). Barrels of unknown contents are also visible in historical aerial photos dating back to WCLC's tenure at the Site (UCSB Frame 55: 3705). Based on the suspected activities and regulator requested analytical testing, the constituents of potential concern associated with WCLC's use of this area are perchlorate and TCE. Based on the suspected activities, the constituent of concern associated with United Fireworks' use of this area is perchlorate.

In 2006, ENVIRON collected nine soil samples from three borings. The samples were analyzed for perchlorate; there were no detections.

In 2009, ENVIRON installed two additional soil borings outside the west and east doors of Building 40. The soil boring on the west side of Building 40 was completed to a depth of 75 ft, and nine soil samples were collected and analyzed for perchlorate with no detections. The soil boring on the east side of Building 40 was completed to a depth of 390 ft; 40 soil samples and 1 grab groundwater sample were collected and analyzed for perchlorate. The highest perchlorate detection of 3,000 ppb was found at a depth of 210 ft bgs. Below 280 ft bgs, perchlorate was no longer detected in soil, nor was perchlorate present in the sample that was collected at 390 ft bgs from a 4 ft thick zone of what is believed to be perched groundwater.

Soil gas was analyzed at two locations within the study area; no TCE was detected.

4.2.3 Study Area 11

Study Area 11, specifically Building 47, was identified as an area where WCLC (SOP D-8, KWKA00013693) and subsequently Goodrich (Bland Deposition, Exhibit 37, June 13, 1955 at 455, and Exhibit 102 to Haggard Deposition) may have screened and dried perchlorate. Based on the suspected activities, the constituent of potential concern associated with both WCLC's and Goodrich's use of this area is perchlorate.

In 2006, ENVIRON collected 10 soil samples from one L-shaped trench. The samples were analyzed for perchlorate; there was one detection of 58 ppb at 10 ft bgs.

In 2009, at the request of USEPA, ENVIRON installed a soil boring outside the location of the south door to Building 47. The soil boring was completed to a depth of 400 ft bgs, and 44 soil

samples were collected and analyzed for perchlorate. The highest perchlorate detection was found at a depth of 10 ft bgs; below 269 ft bgs there was one detection of perchlorate (30 ppb at 329 ft bgs), followed by non-detect results to 400 ft bgs.

4.2.4 Study Area 37

Study Area 37 was identified by USEPA as a former soil and rock pile, first visible in a 1953 aerial photograph, during WCLC's occupation of the Site (Aerial photograph PAI/AM November 19, 1953, Frame 348A). The origin of the pile is unknown and there is no known WCLC activity associated with this area, though multiple parties have generally operated on and around this portion of the Site throughout the Site's history. Subsequent to the 2009 investigation, additional aerial photography review and analysis established that the feature in the 1953 photograph was no longer visible by September 13, 1968 (USGS), and that a new similar feature became visible several feet to the north by February 13, 1985 (IK Curtis). Based on the regulator requested analytical testing, the constituents of potential concern associated with historical use of this area are perchlorate and TCE.

In 2004, ENVIRON collected soil samples at six locations in this area. One sample contained perchlorate, at 110 ppb; there was no TCE detected in any of the soil samples.

During the 2006 RI, at the request of USEPA, ENVIRON collected two additional soil samples from one trench. The samples were analyzed for perchlorate; there were no detections.

In 2009, at the request of USEPA, ENVIRON collected 23 additional soil samples from a 200-ft deep boring, adjacent to the location of the 2004 perchlorate detection. The highest perchlorate detection of 340 ppb was found at a depth of 90 ft bgs. Below 100 ft bgs, perchlorate was not detected in 12 samples to 199 ft bgs.

Soil gas was analyzed at eight locations within the study area; no TCE was detected.

4.2.5 Study Area 4

Study Area 4 is the location of darkened and possibly stained areas adjacent to Building 49 as shown on aerial imagery dating back to WCLC's tenure at the Site (October 1955 Aerial 149REV). In addition, this study area is the location of an in-ground clarifier subsequently installed and used by fireworks companies operating at the Site (Locus, 2004). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is TCE. Based on the reported analytical testing, the constituents of potential concern associated with fireworks companies' use of this area are perchlorate and TCE.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier for the presence of perchlorate and TCE; there were no detections. In addition, during the ENVIRON 2004 RI, soil gas was analyzed at four locations within the study area; no TCE was detected.

4.2.6 Study Area 5

Study Area 5, specifically Building 41, was identified as an area where WCLC may have formulated photoflash mix that contained perchlorate (SOP B-4, KWKA 00013684). In addition, this study area is the location of an in-ground clarifier subsequently installed and used by

fireworks companies operating at the Site, as well as an apparent pyrotechnics disposal area (Locus, 2004). Based on the suspected activities, the constituent of potential concern associated with WCLC's use of this area is perchlorate. Based on the reported analytical testing, the constituents of potential concern associated with fireworks companies' use of this area are perchlorate and TCE.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier, and near an apparent pyrotechnics disposal area, for the presence of perchlorate and TCE; there were no detections.

In 2006, ENVIRON collected three soil samples from one trench, and submitted the samples for perchlorate analysis to a lab; there were no detections.

4.2.7 Study Area 7

Study Area 7 is the location of a former WCLC incinerator visible in a 1955 aerial photograph (UCSB Frame 55: 3707, KWK 44394). Based on the regulator requested analytical testing, the constituents of potential concern associated with WCLC's use of this area are perchlorate and TCE.

In 2006, ENVIRON collected two soil samples from one trench. The samples were analyzed for perchlorate; there were no detections. Soil gas was analyzed at two locations within the study area; no TCE was detected.

4.2.8 Study Area 8

Study Area 8, specifically Building 15, was identified as an area where WCLC may have tested 60 mm flares, which did not contain perchlorate (John Melito Deposition, November 1, 2005 at 122-123). In addition, a small incinerator located immediately to the east of the building is visible in a 1955 oblique air photo (UCSB Frame 55: 3707, KWK 44394). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is perchlorate.

In 2006, ENVIRON collected four soil samples from one trench. The samples were analyzed for perchlorate; there were no detections.

4.2.9 Study Area 9

Study Area 9 was identified as an area where WCLC may have disposed of chemicals and other debris (Davis Deposition, December 1, 2004 at 262-263). Based on the regulator requested analytical testing, the constituents of potential concern associated with WCLC's use of this area are perchlorate and TCE.

In 2006, ENVIRON collected nine soil samples from four trenches. The samples were analyzed for perchlorate; there were no detections, and no debris was found. Soil gas was analyzed at four locations within the study area; no TCE was detected.

4.2.10 Study Area 10

Study Area 10, specifically Building 48, was identified as an area where WCLC may have weighed perchlorate (Davis Deposition, December 1, 2004 at 255 and Exhibit 84). Based on

the suspected activities, the constituent of potential concern associated with WCLC's use of this area is perchlorate.

In 2006, ENVIRON collected three soil samples from one trench. The samples were analyzed for perchlorate; there were no detections.

4.2.11 Study Area 14

Study Area 14, specifically Building 28, was identified as an area where WCLC may have inspected potassium perchlorate (SOP I-6, KWKA00013715). In addition, an in-ground clarifier was subsequently installed and used in this area by fireworks companies operating at the Site (Locus, 2004). Based on the suspected activities, the constituent of potential concern associated with WCLC's use of this area is perchlorate. Based on the reported analytical testing, the constituents of potential concern associated with fireworks companies' use of this area are perchlorate and TCE.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier for the presence of perchlorate and TCE; there were no detections. In addition, as part of the ENVIRON 2006 RI, two soil samples collected from one trench were analyzed for perchlorate; there were no detections.

4.2.12 Study Area 15

Study Area 15, specifically Building 12, was identified as an area where Goodrich may have screened and dried ammonium perchlorate (Wever Deposition, November 9, 2004 at 94-95 and Exhibit 140). It was also identified as an area where WCLC may have handled perchlorate (Davis Deposition, December 1, 2004 at 207 and Exhibit 82). Based on the suspected activities, the constituent of potential concern associated with both WCLC's and Goodrich's use of this area is perchlorate.

In 2006, ENVIRON collected five soil samples from one trench. The samples were analyzed for perchlorate; there were no detections.

4.2.13 Study Area 16

Study Area 16 is the location of drums and darkened, possibly stained, surface soil adjacent to Building 8 during WCLC's tenure at the Site as shown on a 1955 aerial image (UCSB Frame 55: 3705). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at four locations within the study area; no TCE was detected.

4.2.14 Study Area 17

Study Area 17 is the location of a former WCLC incinerator visible in a 1955 aerial photograph (UCSB Frame 55: 3707, KWK 44394). Based on the regulator requested analytical testing, the constituents of potential concern associated with WCLC's use of this area are perchlorate and TCE.

In 2006, ENVIRON collected two soil samples from one trench. The samples were analyzed for perchlorate; there were no detections. Soil gas was analyzed at two locations within the study area; no TCE was detected.

4.2.15 Study Area 19

Study Area 19, specifically Building 34, was identified as an area where Goodrich may have dried, blended, and screened perchlorate (Exhibit 92 to Wever Deposition). In addition, discolored soil and barrels of unknown contents are visible in historical aerial photos dating back to WCLC's tenure at the Site (UCSB Frame 55:3706). Based on the suspected activities, the constituent of potential concern associated with Goodrich's use of this area is perchlorate. Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is TCE.

In 2006, ENVIRON collected four soil samples from one boring. The samples were analyzed for perchlorate; there were no detections. Soil gas was analyzed at two locations within the study area; no TCE was detected.

4.2.16 Study Area 21

Study Area 21, specifically Building 30, was identified as an area where WCLC may have weighed perchlorate (KWKA00023310). In addition, an in-ground clarifier was subsequently installed and used in this area by fireworks companies operating at the Site (Locus, 2004). Based on the suspected activities, the constituent of potential concern associated with WCLC's use of this area is perchlorate. Based on the reported analytical testing, the constituents of potential concern associated with fireworks companies' use of this area are perchlorate and TCE.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier for the presence of perchlorate and TCE; there were no detections.

In 2006, ENVIRON collected two soil samples from one trench. The samples were analyzed for perchlorate; there were no detections.

4.2.17 Study Area 23

Study Area 23, specifically Building 35, was identified as a former WCLC assembly shop and an area where WCLC may have used TCE as a solvent (J. Allegranza, July 13, 2005 at 37:17 to 39:25). Based on the suspected activities, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at four locations within the study area; no TCE was detected.

4.2.18 Study Area 24

Study Area 24 is the location of an apparent former WCLC scrap material storage area north of Building 27 (October 1955 Aerial 149REV). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at three locations within the study area; no TCE was detected.

4.2.19 Study Area 25

Study Area 25, specifically Building 18, was identified as a former WCLC maintenance shop and an area where WCLC may have used of TCE as a solvent (F. Gardner, July 6, 2005 at 423:14 to 424:1). Based on the suspected activities, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at six locations within the study area; no TCE was detected.

4.2.20 Study Area 29

Study Area 29, specifically Building 43, was identified as an area where WCLC may have disassembled photoflash cartridges and tested them for moisture (SOP I-2, KWKA 00013723). In addition, based on deposition testimony of a former employee, WCLC may have used solvents in this area (J. Pfarr Deposition, pages 60-61). This study area is also the location of an in-ground clarifier subsequently installed and used by fireworks companies operating at the Site (Locus, 2004). Based on the suspected activities and the reported analytical testing, the constituents of potential concern associated with both WCLC's and fireworks companies' uses of this area are perchlorate and TCE.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier for the presence of perchlorate and TCE. There were no detections.

In 2006, ENVIRON collected two soil samples from one boring⁶. The samples were analyzed for perchlorate and TCE; there were no detections. Soil gas was analyzed at six locations within the study area; no TCE was detected.

4.2.21 Study Area 30

Study Area 30, specifically Building 35, is a former WCLC assembly shop where TCE may have been used (J. Allegranza, July 13, 2005 at 37:17 to 39:25). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at four locations within the study area; no TCE was detected.

4.2.22 Study Area 31

Study Area 31 is the location of darkened, possibly stained, surface soil west of Building 27 during WCLC's tenure at the Site (October 1955 Aerial 149REV). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at four locations within the study area; no TCE was detected.

⁶ This boring is shown as two separate sampling locations on Figure 4 due to refusal being encountered before the target depth was reached. The boring was redrilled a few feet from the original location to obtain a soil sample at 25 ft.

4.2.23 Study Area 38

Study Area 38 is the location of a former drum storage area visible in historical aerial photographs dating back to WCLC's tenure at the Site (1955 141REV, 1955 144REV). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at eleven locations within the study area; no TCE was detected.

4.2.24 Study Area 39

Study Area 39 is the location of a former drum storage area visible in historical aerial photographs dating back to WCLC's tenure at the Site (1955 141REV, 1955 144REV). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at four locations within the study area; no TCE was detected.

4.2.25 Study Area 40

Study Area 40 was identified as an area where WCLC may have used solvents to clean spray guns used to paint floatlights (J. Allegranza, July 13, 2005 at 52:2 to 57:10). Based on the suspected activities, the constituent of potential concern associated with WCLC's use of this area is TCE.

Soil gas was analyzed at two locations within the study area; no TCE was detected.

4.2.26 Study Area 42

Study Area 42 was identified as a former rail spur where WCLC may have disposed of trash, based on a 1955 oblique air photograph (UCSB October 29, 1955, Frame 55:3705). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is perchlorate.

The 2006 Work Plan called for two soil borings at this location. At the request of the Regional Board, ENVIRON installed ten trenches in an attempt to locate remnants of material visible in the historical oblique air photograph. No evidence of waste disposal was found, and no samples were collected. Subsequently, the Regional Board requested the installation of four borings in this area. In 2006, ENVIRON collected ten soil samples from four borings. The samples were analyzed for perchlorate; there were no detections.

4.2.27 Study Area 43

Study Area 43 was identified as an area where a liquid discharge appears to have occurred from the former WCLC boiler house (UCSB October 29, 1955, Frame 55:3709). Based on the regulator requested analytical testing, the constituents of potential concern associated with WCLC's use of this area are perchlorate and TCE.

In 2004, ENVIRON collected soil samples at six locations in this area; no perchlorate or TCE were detected. During the 2006 RI, four additional soil samples were collected from two borings

and analyzed for perchlorate and TCE⁷; there were no detections. Soil gas was analyzed at eight locations within the study area; no TCE was detected.

4.2.28 Study Area 44

Study Area 44 was identified as a former rail spur where WCLC may have disposed of trash, based on a 1955 oblique air photograph (UCSB October 29, 1955, Frame 55:3705). Based on the regulator requested analytical testing, the constituent of potential concern associated with WCLC's use of this area is perchlorate.

In 2006, ENVIRON collected 10 soil samples from one trench and one boring. The samples were analyzed for perchlorate; there were no detections⁸.

⁷ One of the four samples was analyzed for VOCs and perchlorate; the remaining four samples were analyzed for perchlorate only.

⁸ One sample was collected from an epoxy-type material found on the inside of a warped 55-gallon drum encountered during the excavation. This sample was analyzed for SVOCs and VOCs and had detections of 1200 ppb chloroform, 830 ppb p-cymene, 670 ppb styrene, 290 ppb propylbenzene, 270 ppb 1-methylethylbenzene and 180 ppb ethylbenzene. No SVOCs were detected.

5 Other Study Areas

5.1 Introduction

Section 5 of this report includes a discussion of all data collected from study areas other than where WCLC is known or suspected to have used either perchlorate or TCE, the two constituents of concern. These areas are Study Areas 1, 2, 3, 6, 12, 20, 22, 26, 27, 28, 32, 33, 34, 35, 36, 41, 45, 46, 47, 48, 49, and 50. In thirteen of these study areas perchlorate and/or TCE were detected. These areas where perchlorate and/or TCE were detected are presented at the beginning of Section 5.2, in order of decreasing maximum perchlorate detections. The remaining nine study areas are presented in alphanumerical order. Sample locations for each study area described in this section are shown on Figure 5.

5.2 Soil and Soil Gas Data

5.2.1 Study Area 46

Study Area 46 was identified as the location of the McLaughlin Pit (SBCFC October 15, 1972, C-193 - Frame 21). The McLaughlin Pit was an approximately twenty by twenty by four foot deep “pond” or “swimming pool” built by Pyrotechnics, and used by Pyrotechnics and other fireworks companies for the disposal of pyrotechnic wastes (Hescox, February 14, 2005 at 105:5-16). Based on the reported analytical testing, and the suspected use, the constituents of potential concern associated with Pyrotechnics’ and other fireworks companies’ use of this area are perchlorate and TCE.

In 2004, Kleinfelder conducted an initial perchlorate investigation at the McLaughlin Pit. The investigation consisted of collecting 11 samples from five 4 to 5 ft deep trenches, and two 20 ft deep borings. Perchlorate was detected in all but two samples, at concentrations ranging from 247 ppb in one of the trenches to 205,000 ppb in boring B-1 at a depth of 15 ft bgs.

In 2006, Adverus collected 25 soil samples from one deep boring (CMW-01) located to the southeast of the McLaughlin Pit. The samples were analyzed for perchlorate; there were 20 detections extending from a depth of 65 ft bgs down to the groundwater interface, ranging from 25 to 3,200 ppb. In addition, 20 of those samples were analyzed for TCE; there were no detections.

In 2006, ENVIRON collected 23 soil samples from one deep boring (CML-01) through the center of the McLaughlin Pit. The samples were analyzed for perchlorate; there were 22 detections extending from the shallow vadose zone down to the groundwater interface, ranging from 33 to 190,000 ppb. In addition, 11 of those samples were analyzed for TCE; detections were encountered in two samples with a maximum of 8.7 ppb at 200 ft bgs.

5.2.2 Study Area 50

Study Area 50 is the location of a Broco facility where explosive magazines and underwater welding and cutting rods were manufactured. In addition, hazardous wastes generated from these activities were accumulated in this area (BBL, 2005). Based on the reported analytical testing, the constituents of potential concern associated with Broco’s use of this area are perchlorate and TCE.

From 2005 through 2008, BBL and Kleinfelder collected 145 soil samples from a series of trenches, potholes, and borings – the deepest being 200 ft. The soil samples were analyzed for perchlorate; there were 80 detections with a maximum of 65,800 ppb. No further sampling has been conducted to date to determine the nature and extent of the perchlorate contamination encountered in the shallow and intermediate depth soils. Soil gas was analyzed at four locations within the study area; no TCE was detected.

5.2.3 Study Area 47

Study Area 47, is the location of the northernmost of the so-called “Southwest Disposal Pits,” and is shown in historical air photographs dating back to Goodrich’s tenure at the Site (UCSB December 5, 1961, C-24223Frame 7-5). It is an area where Goodrich may have disposed of waste. Based on the suspected activities and reported analytical testing, the constituents of potential concern associated with Goodrich’s use of this area are perchlorate and TCE.

In 2004, Geosyntec collected five soil samples from five boring locations, the majority of which were located outside the footprint of the disposal pit. The soil samples were analyzed for perchlorate and TCE; there were no detections. Soil gas was also analyzed at 17 locations, the majority of which were located outside the footprint of the disposal pit; no TCE was detected.

In 2006, ENVIRON collected 12 soil and material samples from one trench at the location of the pit. The soil samples were analyzed for perchlorate; there were 12 detections, ranging from 1,700 to 9,000 ppb. No further sampling has been conducted to date to determine the nature and extent of the perchlorate contamination encountered in the shallow soils. In addition, four of those samples were analyzed for TCE; there were no detections.

5.2.4 Study Area 33

Study Area 33, specifically in and around Building 1, was identified as an area where Goodrich may have conducted casing salvage operations of Sidewinder and other missiles (Polzien Deposition, Exhibit 292). Based on the suspected activities, the constituents of potential concern associated with Goodrich’s use of this area are perchlorate and TCE.

In 2006, ENVIRON collected 33 soil samples from 10 borings. The samples were analyzed for perchlorate; there were 19 detections ranging from 26 to 7,400 ppb. No further sampling has been conducted to date to bound the perchlorate encountered in the shallow soils. Soil gas was analyzed at eight locations within the study area; no TCE was detected.

5.2.5 Study Area 48

Study Area 48 is the location of the middle and southernmost of the so-called “Southwest Disposal Pits,” and is shown in historical air photographs dating back to Pyrotechnics’ tenure at the Site (USGS September 13, 1968, M68429 - Frame 102A and Hescoc, February 14, 2005 at 114:4-19). It is an area where Pyrotechnics and perhaps other fireworks manufacturers disposed of waste. Based on the suspected activities and reported analytical testing, the constituents of potential concern associated with Pyrotechnics’ use of this area are perchlorate and TCE.

In 2006, ENVIRON collected 27 soil samples from three trenches and two borings. The samples were analyzed for perchlorate; there were 22 detections, ranging from 22 to 3,900 ppb. No further sampling has been conducted to date to determine the nature and extent of the

perchlorate contamination encountered in the shallow soils. In addition, 17 of these samples were analyzed for TCE; there were no detections.

5.2.6 Study Area 45

Study Area 45 was identified as an area where Goodrich's Burn Pits were located (Aerial photograph USDA, October 15, 1959, 15W - Frame 80, CONT December 14, 1960, 360 - Frame 6-23). Based on the suspected activities and reported analytical testing, the constituents of potential concern associated with Goodrich's use of this area are perchlorate and TCE.

In 2004, Geosyntec collected eight soil samples from four boring locations. The soil samples were analyzed for perchlorate and TCE; there were perchlorate detections in every sample, with a maximum of 630 ppb; no TCE was detected. Soil gas was also analyzed at 14 locations in and around the former Goodrich Burn Pits. TCE was detected in four samples, with a maximum concentration of 1.7 µg/L.

In 2006, Adverus collected 28 soil samples from one deep boring (CMW-02) to the southeast of the Goodrich Burn Pits. The samples were analyzed for perchlorate; there were 14 detections extending from the shallow soils to a depth of 285 ft bgs, with a maximum concentration of 1,700 ppb. In addition, 23 of those samples were analyzed for TCE; there were no detections.

In 2006, ENVIRON collected thirty-five soil samples from eight borings. The samples were analyzed for perchlorate; there were 12 detections, ranging from 23 to 760 ppb. In addition, 20 of those samples were analyzed for TCE; there were no detections.

In 2009, CH2M Hill, on behalf of USEPA, installed three 100-ft borings, and collected 33 soil samples. The samples were analyzed for perchlorate; there were 21 detections, ranging from 18 to 2,800 ppb. In addition, four vapor probes were installed in each boring. TCE was detected in every sample, with a maximum detection of 1,700 µg/m³ at 100 ft in EPASG-3, located southeast of the Goodrich Burn Pits. No further sampling has been conducted to date to determine the nature and extent of the perchlorate contamination encountered in the shallow soils.

5.2.7 Study Area 22

Study Area 22 is the location of APE's former burn area for damaged and "off-spec" fireworks (PES, 2003). Based on the reported analytical testing, the constituent of potential concern associated with APE's use of this area is perchlorate.

In 2003, PES collected 11 soil samples from a series of test trenches. The soil samples were analyzed for perchlorate; there were six detections, ranging from 79 to 2,900 ppb. No further sampling has been conducted to date to determine the nature and extent of the perchlorate contamination encountered in the shallow soils.

5.2.8 Study Area 6

Study Area 6, specifically Building 20, was identified as an area where Goodrich may have conducted strand burning (Graham Deposition, January 19, 2005 at 205:12 to 205:25, and Exhibit 143). In addition, United Fireworks stored oxidizers, including potassium perchlorate, in Building 20 (RFDW006298, letter dated October 23, 1968 from United Fireworks to Rialto Fire

Department). Based on the suspected activities, the constituent of potential concern associated with Goodrich's and United Fireworks' use of this area is perchlorate. Although WCLC originally built and occupied this building, there is no evidence that it used perchlorate at this location.

In 2006, ENVIRON collected 16 soil samples from seven 25-foot deep soil borings⁹ and one grab sample from material within a pipe leading away from the floor drain in Building 20. The samples were analyzed for perchlorate; there were no detections.

In 2009, at the request of USEPA as set forth in AOC 2009-01, the open terminus of the drain pipe was excavated and exposed beneath an existing building north of Building 20. Material from within the pipe as well as soil beneath the terminus were sampled and analyzed for perchlorate. The soil sample did not contain perchlorate above the MRL. The sample of the pipe's contents at the terminus contained perchlorate at a level of 69 ppb¹⁰, as well as a number of other constituents such as polycyclic aromatic hydrocarbons and heavy metals (see Appendix I).

5.2.9 Study Area 28

Study Area 28 is the location of the former Goodrich 150-gallon production mixer where perchlorate was used. (Polzien Deposition April 5, 2005 at 93 and 144-145). This mixer was subsequently used by Pyrotechnics (Hescoc Deposition, Exhibit 172). Based on the suspected activities and reported analytical testing, the constituents of potential concern associated with both Goodrich's and Pyrotechnics' uses of this area are perchlorate and TCE.

In 2003, PES collected three soil samples from one trench. Two of the samples were analyzed for perchlorate; there were no detections. All three samples were analyzed for TCE; there were no detections.

In 2004, Geosyntec analyzed soil gas at 12 locations; no TCE was detected.

In 2006, ENVIRON collected 45 soil samples from three trenches¹¹, nine grab locations, and one deep boring advanced during installation of well CMW-5. The samples were analyzed for perchlorate; there were four detections ranging from 24 to 68 ppb¹².

⁹ Borings were located along the path of an underground pipe, believed to originate from a floor drain in Building 20. Two of the borings were located at the outlet of a buried cesspool.

¹⁰ Perchlorate was first analyzed by USEPA Method 314.0 MOD; no perchlorate was detected above the MRL; however, due to matrix interference the MRL was elevated above the target MRL of 20 ppb. At the request of USEPA, the sample was reanalyzed using USEPA Method 6860 which yielded a result of 69 ppb, however, this result was obtained outside of the hold time. The sample extract – which was still within its hold time - was subsequently analyzed for perchlorate using USEPA Method 6850. Using this method, perchlorate was detected at a level of 34 ppb.

¹¹ One trench was installed beneath a clarifier, one trench was installed along a trench drain along the edge of the former building and a third trench was dug as a series of three potholes following the path of a buried open-jointed clay pipe.

¹² Three of the four detections were encountered in the grab samples taken from the material within the clay pipe or the soil immediately beneath the pipe with concentrations ranging from 24 to 60 ppb. The fourth and highest detection of 68 ppb was encountered in a saturated soil sample from the deep boring (CMW-05) at a depth of 400 feet; all overlying samples in that boring were below the MRL.

5.2.10 Study Area 32

Study Area 32, specifically Building 10, was identified as an area where Goodrich may have weighed ammonium perchlorate (M. Willis Deposition, Page 189 - Exhibit 1045). Based on the suspected activities, the constituent of potential concern associated with Goodrich's use of this area is perchlorate.

In 2006, ENVIRON collected 22 soil samples from eight borings. The samples were analyzed for perchlorate; there were two detections, 54 and 22 ppb, at 1 and 5 feet bgs, respectively, with no detections in the four underlying samples.

5.2.11 Study Area 12

Study Area 12 includes Buildings 2, 3, and 4, which were identified as locations where Goodrich may have mixed ammonium perchlorate in small R&D mixers (Graham Deposition, January 19, 2005 at 204 and Exhibit 123). In addition, in-ground clarifiers were subsequently installed and used in this area by fireworks companies operating at the Site (Locus, 2004). Based on the suspected activities and reported analytical testing, the constituents of potential concern associated with both Goodrich's and fireworks companies' uses of this area are perchlorate and TCE.

In 2004, Geosyntec analyzed soil gas at 18 locations; no TCE was detected.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier for the presence of perchlorate and TCE; there were no detections.

In 2006, ENVIRON collected eight soil samples from three trenches. The samples were analyzed for perchlorate; at one location perchlorate was detected at 57 ppb at 10 ft bgs; perchlorate was not detected in the underlying sample.

5.2.12 Study Area 34

Study Area 34, specifically Building 51, is the location of an APE warehouse where class C explosives were stored (PES, 2003). Based on the reported analytical testing, the constituent of potential concern associated with APE's use of this area is perchlorate.

In 2003, PES collected seven soil samples from three trenches. The samples were analyzed for perchlorate; there was one detection of 41 ppb, but a duplicate of this sample was below the MRL of 40 ppb.

5.2.13 Study Area 36

Study Area 36 is the location of monitoring well CMW-03 installed by Adverus on behalf of PSI. There are no known activities related to perchlorate or TCE in this area. Based on the reported analytical testing, the constituents of potential concern associated with the use of this area are perchlorate and TCE.

In 2006, Adverus collected 15 soil samples from one deep boring (CMW-03). The samples were analyzed for perchlorate; there were three detections: 39 ppb at 100 ft bgs and 33 ppb in two samples at 300 ft bgs. In addition, nine of those samples were analyzed for TCE; there were no detections.

5.2.14 Study Area 1

Study Area 1 is the location of Bunker M-11, used as a mortar storage area by PSI (Kleinfelder, 2003). Based on the reported analytical testing, the constituents of potential concern associated with PSI's use of this area are perchlorate and TCE.

In 2003, Kleinfelder collected three soil samples from one trench. The samples were analyzed for perchlorate and TCE; there were no detections.

5.2.15 Study Area 2

Study Area 2 is the location of PSI's former mortar storage area (Kleinfelder, 2003). Based on the reported analytical testing, the constituents of potential concern associated with PSI's use of this area are perchlorate and TCE.

In 2003, Kleinfelder collected three soil samples from one trench. The samples were analyzed for perchlorate and TCE; there were no detections.

5.2.16 Study Area 3

Study Area 3 is the location of APE's main warehouses. Activities in these buildings (Buildings 76, 77, 78, and 79) include assembly of assortment trays, as well as storage, shipping, and receiving of Class C explosives¹³ (PES, 2003). Based on the reported analytical testing, the constituent of potential concern associated with APE's use of this area is perchlorate.

In 2003, PES collected 21 soil samples from 10 trenches. The samples were analyzed for perchlorate; there were no detections.

5.2.17 Study Area 20

Study Area 20, specifically Building 31, was identified as an area where Goodrich may have mixed ammonium perchlorate in a 100-gallon mixer (Exhibit 92 to Wever Deposition). In addition, an in-ground clarifier was subsequently installed and used in this area by fireworks companies operating at the Site (Locus, 2004). Based on the suspected activities, the constituent of potential concern associated with Goodrich's use of this area is perchlorate. Based on the reported analytical testing, the constituents of potential concern associated with fireworks companies' use of this area are perchlorate and TCE.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier for the presence of perchlorate and TCE; there were no detections.

In 2006, ENVIRON collected four soil samples from two borings. The samples were analyzed for perchlorate; there were no detections.

¹³ Class C explosives include certain types of manufactured articles which contain Class A or Class B explosives, or both, as components but in restricted quantities (Class B explosives possess a flammable hazard, such as propellant explosives. Class A explosives possess a detonating hazard; such as dynamite, nitroglycerin, or black powder).

5.2.18 Study Area 26

Study Area 26, specifically Building 73, is the location of an in-ground clarifier installed and used by fireworks companies operating at the Site (Locus, 2004). Based on the reported analytical testing, the constituents of potential concern associated with fireworks companies' use of this area are perchlorate and TCE.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier for the presence of perchlorate and TCE; there were no detections.

5.2.19 Study Area 27

Study Area 27, specifically Building 72, was identified as an area where Pyrotronics may have mixed fireworks chemicals that contained perchlorate (Hescox Deposition, February 14, 2005 at 99-100). In addition, an in-ground clarifier was installed and used in this area by fireworks companies. Based on the suspected activities and reported analytical testing, the constituents of potential concern associated with both Pyrotronics and fireworks companies' use of this area, include perchlorate and TCE.

In 2004, Locus investigated the shallow soil near the outfall of a clarifier for the presence of perchlorate and TCE; there were no detections.

In 2006, ENVIRON collected five soil samples from two borings. The samples were analyzed for perchlorate; there were no detections.

5.2.20 Study Area 35

Study Area 35 is the location of PSI's current mortar storage area (Kleinfelder, 2003). Based on the reported analytical testing, the constituents of potential concern associated with PSI's use of this area are perchlorate and TCE.

In 2003, Kleinfelder collected three soil samples from one trench. The samples were analyzed for perchlorate and TCE; there were no detections.

5.2.21 Study Area 41

Study Area 41 is the location of monitoring well CMW-04 installed by ENVIRON on behalf of EIL. There are no known activities in this area. Based on the regulator requested analytical testing, the constituent of potential concern associated with the use of this area is perchlorate.

In 2006, five soil samples collected from one deep boring (CMW-04) were analyzed for perchlorate; there were no detections.

5.2.22 Study Area 49

Study Area 49 is the portion of the so-called "Engle Property" located on the Site. WCLC did not conduct any activities in this area, and subsequent activities by others on this parcel are unknown to ENVIRON. Based on the reported analytical testing, the constituent of potential concern associated with the use of this area is perchlorate.

In 2005, Kleinfelder collected six soil grab samples¹⁴. The samples were analyzed for perchlorate; there were no detections.

¹⁴ In total, 38 soil grab samples were collected, but only six of these are located on the BF Goodrich Site.

6 Site Groundwater Data

Groundwater data for the Site and its immediate vicinity are discussed below by sampling location. Tables 3 and 4 provide a summary of the groundwater analytical results¹⁵ and elevations. The locations of the wells and their positions in relation to the 50 study areas at the Site are shown on Figure 6. Details related to groundwater data collected by ENVIRON as part of its 2006 RI can be found in the appendices of this report. For more information on wells installed by others, we refer the reader to the documents incorporated by reference herein.

6.1 PW-01

PW-1 was installed in 2004 by Geosyntec, on behalf of Goodrich, at the request of USEPA. It is located northwest and upgradient of the Site. The well is screened from 440 to 480 ft bgs. Between October 2004 and February 2008, when Goodrich stopped sampling its wells near the Site, concentrations of perchlorate ranged from below the MRL to 6.3 ppb; TCE has never been detected. Details on well construction and installation, grab sampling, and encountered lithology can be found in the March 24, 2005 Draft Remedial Investigation Report (Geosyntec, 2005).

6.2 PW-02

PW-2 was installed in 2004 by Geosyntec, on behalf of Goodrich, at the request of USEPA. It is located on the southern portion of the of the Site. The well is screened from 455 to 495 ft bgs. Between October 2004 and March 2009¹⁶ concentrations of perchlorate have ranged from 3 ppb to 10,000 ppb; TCE has ranged from 11 ppb to 420 ppb. Details on well construction and installation, grab sampling, and encountered lithology can be found in the March 24, 2005 Draft Remedial Investigation Report (Geosyntec, 2005).

6.3 PW-03

PW-3 was installed in 2004 by Geosyntec, on behalf of Goodrich, at the request of USEPA. It is located near the southeast corner of the Site. The well is screened from 465 to 496 ft bgs. Between October 2004 and March 2009 concentrations of perchlorate have ranged from 27 to 240 ppb; TCE has ranged from 7.4 to 200 ppb. Details on well construction, grab sampling, and encountered lithology can be found in the March 24, 2005 Draft Remedial Investigation Report (Geosyntec, 2005).

6.4 PW-04

PW-4 was installed in 2004 by Geosyntec, on behalf of Goodrich, at the request of USEPA. It is located on the eastern edge of the Site. The well is screened from 470 to 510 ft bgs. Between October 2004 and March 2009 concentrations of perchlorate have ranged from below the MRL to 81 ppb; TCE has ranged from 0.4 to 13 ppb. Details on well construction, grab sampling, and

¹⁵ Only perchlorate and TCE are shown.

¹⁶ Although Goodrich stopped sampling its wells on and near the Site in early 2008, USEPA performed sampling at some of the wells as recently as March 2009.

encountered lithology can be found in the March 24, 2005 Draft Remedial Investigation Report (Geosyntec, 2005).

6.5 CMW-01

CMW-01 was installed in 2006 by Adverus, on behalf of PSI, at the request of the Regional Board. It is located approximately on the central portion of the Site. The well is triple-completed with screens from 428 to 448 ft bgs (CMW-1A), 470 to 490 ft bgs (CMW-1B), and 513 to 533 ft bgs (CMW-1C). Between July 2006 and August 2009 concentrations of perchlorate ranged from below the MRL to 1,500 ppb, with the highest detections typically encountered in the shallowest zone. During that same period, TCE ranged from below the MRL to 150 ppb, also with the highest detections typically encountered in the shallowest zone. Details on well construction, grab sampling, and encountered lithology have yet to be published in a formal report.

6.6 CMW-02

CMW-02 was installed in 2006 by Adverus, on behalf of PSI, at the request of the Regional Board. It is located approximately on the central western portion of the Site. The well is triple-completed with screens from 432 to 452 ft bgs (CMW-2A), 471 to 491 ft bgs (CMW-2B), and 511 to 531 ft bgs (CMW-2C). Between July 2006 and August 2009 concentrations of perchlorate ranged from below the MRL to 110 ppb, with the highest detections typically encountered in the shallowest zone. During that same period, TCE ranged from below the MRL to 1,500 ppb, also with the highest detections typically encountered in the shallowest zone. Details on well construction, grab sampling, and encountered lithology have yet to be published in a formal report.

6.7 CMW-03

CMW-03 was installed in 2006 by Adverus, on behalf of PSI, at the request of the Regional Board. It is located downgradient of the northwest portion of the Site. The well is triple-completed with screens from 419 to 439 ft bgs (CMW-3A), 459 to 479 ft bgs (CMW-3B), and 504 to 524 ft bgs (CMW-3C). Between July 2006 and August 2009 concentrations of perchlorate ranged from below the MRL to 6.7 ppb, with the highest detections typically encountered in the shallowest zone. During that same period, TCE ranged from below the MRL to 26 ppb, also with the highest detections typically encountered in the shallowest zone. Details on well construction, grab sampling, and encountered lithology have yet to be published in a formal report.

6.8 CMW-04

CMW-04 was installed in 2006 by ENVIRON, on behalf of EII, at the request of the Regional Board. It is located downgradient of the central northern portion of the Site. During the installation of the deep soil boring at this location, 12 grab groundwater samples were collected from six depths and analyzed at two different laboratories for perchlorate and VOCs. Perchlorate was detected in the shallowest grab samples only, at concentrations of 54 and 58 ppb. TCE was detected at various points in the water bearing zone at concentrations ranging from 1.3 ppb to 47 ppb, the highest detections being encountered in the shallowest samples. After grab samples had been collected from the soil boring, the well was triple-

completed with screens from 400 to 440 ft bgs (CMW-4A), 455 to 475 ft bgs (CMW-4B), and 490 to 510 ft bgs (CMW-4C). Between October 2006 and August 2009 concentrations of perchlorate ranged from below the MRL to 150 ppb, with the highest detections typically encountered in the shallowest zone. During that same period, TCE ranged from below the MRL to 40 ppb, also with the highest detections typically encountered in the shallowest zone.

6.9 CMW-05

CMW-05 was installed in 2006 by ENVIRON, on behalf of EII, at the request of the Regional Board. It is located downgradient of the northeast portion of the Site. During the installation of the deep soil boring at this location, 12 grab groundwater samples were collected from six depths and analyzed at two different laboratories for perchlorate and VOCs. Perchlorate was detected throughout the water bearing zone, at concentrations ranging from 38 to 270 ppb. TCE was also detected at various points in the aquifer at concentrations ranging from 7.2 ppb to 100 ppb. The well is triple-completed with screens from 400 to 440 ft bgs (CMW-5A), 460 to 480 ft bgs (CMW-5B), and 500 to 520 ft bgs (CMW-5C). Between October 2006 and August 2009 concentrations of perchlorate ranged from 13 to 470 ppb, with the highest detections typically encountered in the shallowest zone. During that same period, TCE ranged from 2.6 to 270 ppb, also with the highest detections typically encountered in the shallowest zone.

6.10 SB-CML-01

SB-CML-01 was installed in 2006 by ENVIRON, on behalf of EII, at the request of the Regional Board as a soil boring through the center of the McLaughlin Pit. Three grab groundwater samples were collected from this location. Perchlorate was found to range from 8.4 to 1,700 ppb; TCE was detected only in the upper grab sample at a concentration of 150 ppb. The attempt to convert the deep boring to a clustered monitoring well was unsuccessful; therefore no other groundwater data exist at this location.

6.11 Study Area 13

During the ENVIRON 2009 RI installation of a deep soil boring in Study Area 13, a grab groundwater sample was collected from the bottom of borehole SB-M1-05 at depth of approximately 390 ft bgs. The groundwater layer at this depth was approximately 4 feet thick, and is believed to be a perched zone based on water elevations in nearby monitoring wells, and the presence of finer materials immediately below the zone of saturation. The sample was analyzed for perchlorate; there was no detection. The result for this sample has been included with the soil data shown in Table 1.

7 Recommended Further Investigations

The main objective of ENVIRON's work at the Site has been to determine the nature and extent of contamination in the WCLC Operation Areas, and the threat to the public health or welfare or the environment, if any, caused by the release or threatened release of hazardous substances or pollutants or contaminants potentially associated with WCLC operations. With respect to WCLC Operation Areas, sufficient data have now been collected to satisfy this main objective.

In contrast, this does not hold true for many of the areas where WCLC is not known or suspected of having operated, where the degree of sampling conducted to date has generally been less comprehensive than requested by regulators for WCLC Operation Areas. WCLC areas where even small detections of perchlorate were encountered in the shallow soils (e.g. 58 ppb in Study Area 11), were further investigated with the purpose of determining the nature and extent of the contamination – at times collecting samples all the way to groundwater. In contrast, certain non-WCLC areas with far greater shallow soil concentrations remain uncharacterized beyond the top few feet of soil (e.g. 8 ft in Study Area 22). Without recommending any specific study area for further investigation, ENVIRON notes that in general, more data are needed in most non-WCLC Operations Areas to determine the nature and extent of vadose zone contamination and potential groundwater impacts.

8 Summary and Conclusions

8.1 Summary

Since 2003, 50 study areas at the Site have been investigated to varying degrees for the presence of perchlorate and/or TCE, the two main contaminants in groundwater in the Rialto-Colton Basin. WCLC is known or suspected of having used perchlorate, or alleged to have used TCE in a combined total of 28 study areas. No TCE was found in any of the 28 study areas. Perchlorate was found in four of the 28 study areas, namely Study Areas 18, 13, 11, and 37. The perchlorate detections in these four areas have been bounded by an extended series of consecutive non-detect results (i.e. Study Areas 18, 13, 11, and 37).

In the remaining 22 study areas, where WCLC is not known or suspected of having used perchlorate or TCE, perchlorate was detected in 13 study areas, namely Study Areas 46, 50, 47, 33, 48, 45, 22, 6, 28, 32, 12, 34, and 36. In many of these study areas, the nature and extent of perchlorate, and, in the case of Study Area 45, TCE contamination, have not been fully characterized. In addition, groundwater wells downgradient of some of these areas have historically exhibited elevated perchlorate and TCE detections, with values as high as 10,000 ppb for perchlorate (PW-2), and 1,500 ppb of TCE (CMW-2).

8.2 Conclusions

All known or suspected (regardless of the basis for that suspicion) WCLC operations areas have been investigated for TCE and/or perchlorate. No TCE was found in the soil or soil gas samples collected from these areas. As specified in the AOC, the primary objective of ENVIRON's remedial investigation was: "...to determine the nature and extent of contamination in the WCLC operations areas on the Site, and the threat to the public health or welfare or the environment, if any, caused by the release or threatened release of hazardous substances or pollutants or contaminants by WCLC." ENVIRON has met these remedial investigation objectives. The hazardous substance TCE was not detected in any WCLC operations area; thus, there is no indication of a release or threatened release of TCE in the WCLC operations area. The contaminant perchlorate was found in the vadose zone well above the groundwater interface in four study areas, and has been characterized.

In contrast, several non-WCLC study areas were found to contain perchlorate and/or TCE contamination, the nature and extent of which, in almost all cases, remains uncharacterized. Several non-WCLC areas, which have been reasonably well investigated, such as the McLaughlin Pit, were found to be major sources of contamination, with perchlorate consistently present throughout the soil profile and in groundwater directly below and immediately downgradient of the study area. In most non-WCLC study areas, where the nature and extent of the contamination remains largely uncharacterized, further investigation is warranted to evaluate the potential impacts.

9 References

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Tables

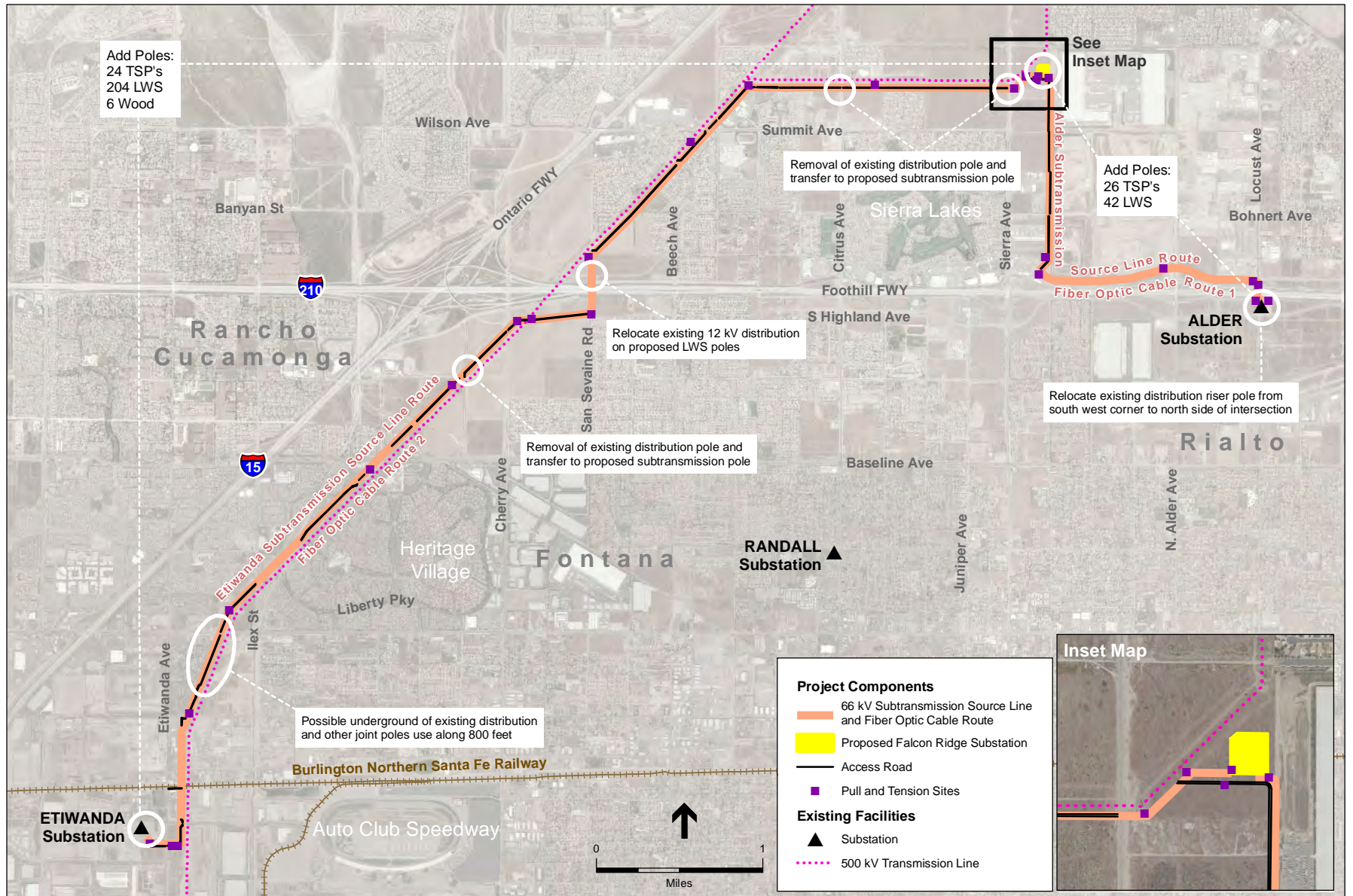
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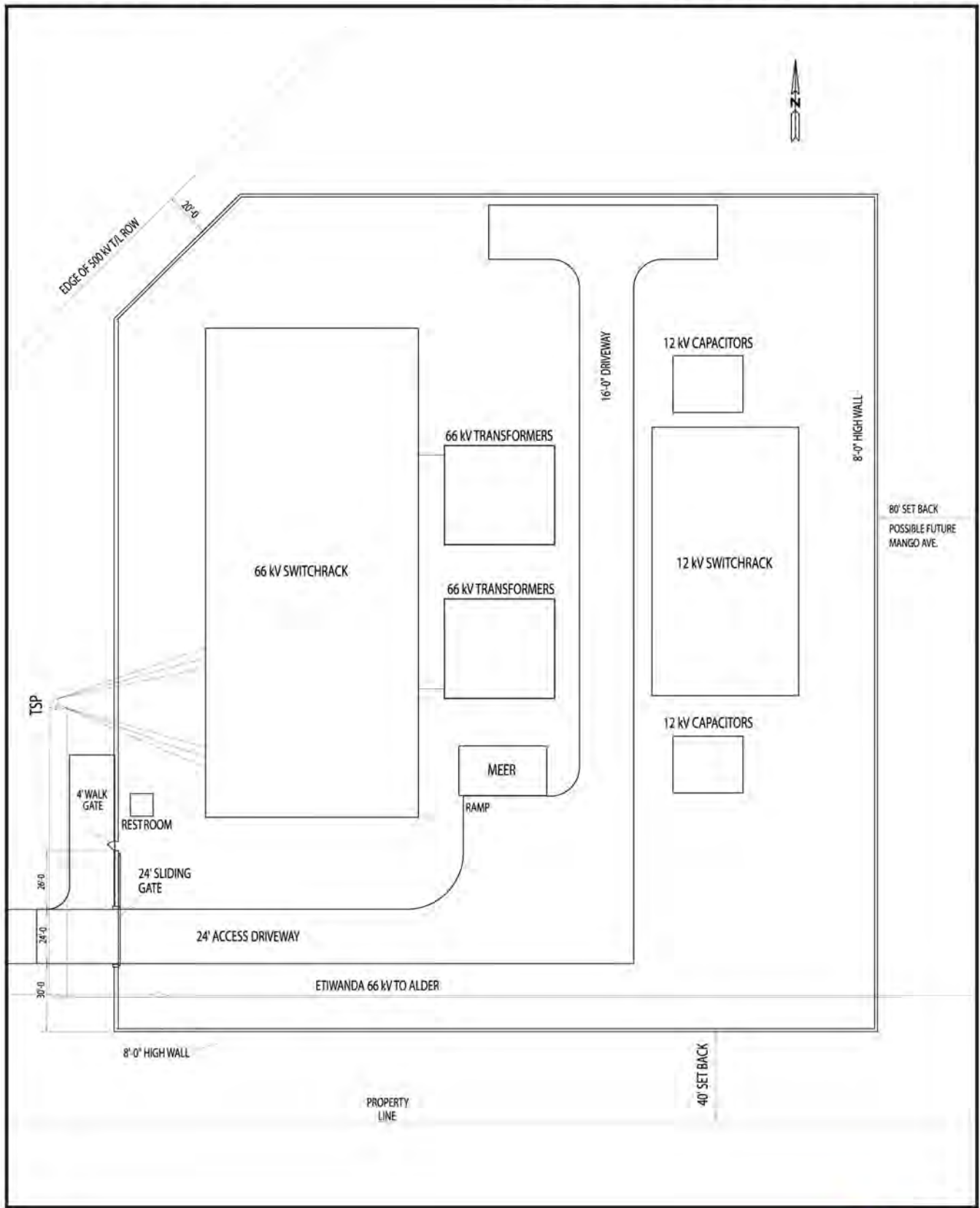
Appendices A - N
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APPENDIX G

Revised Draft EIR Figures

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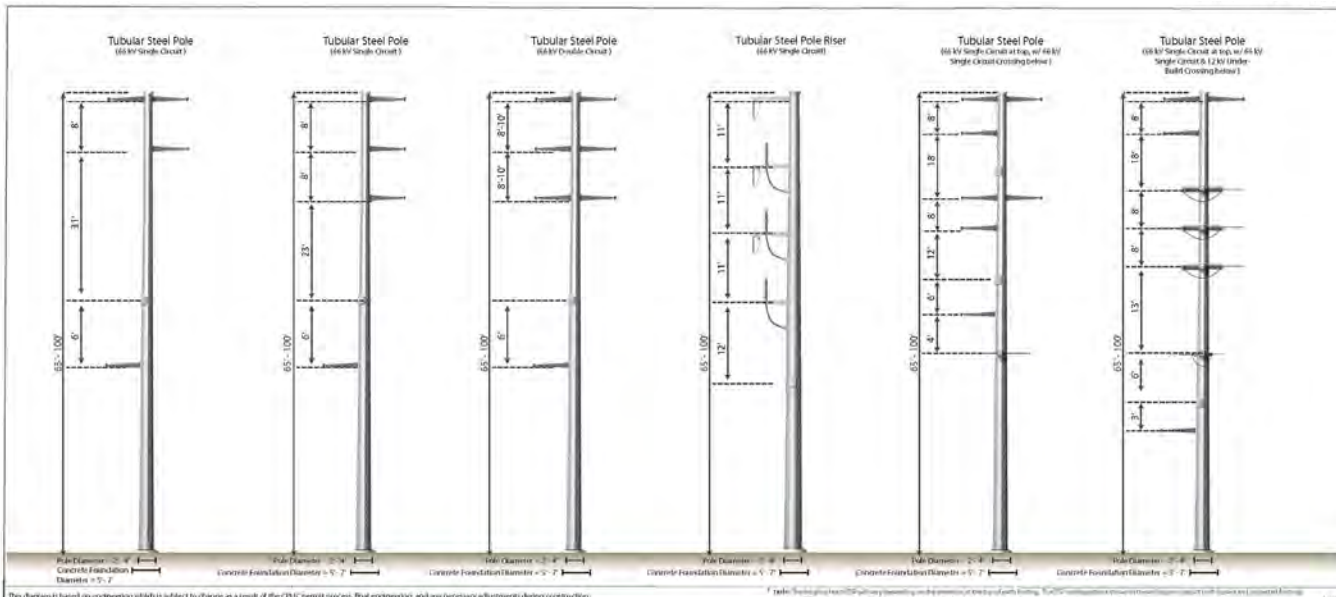
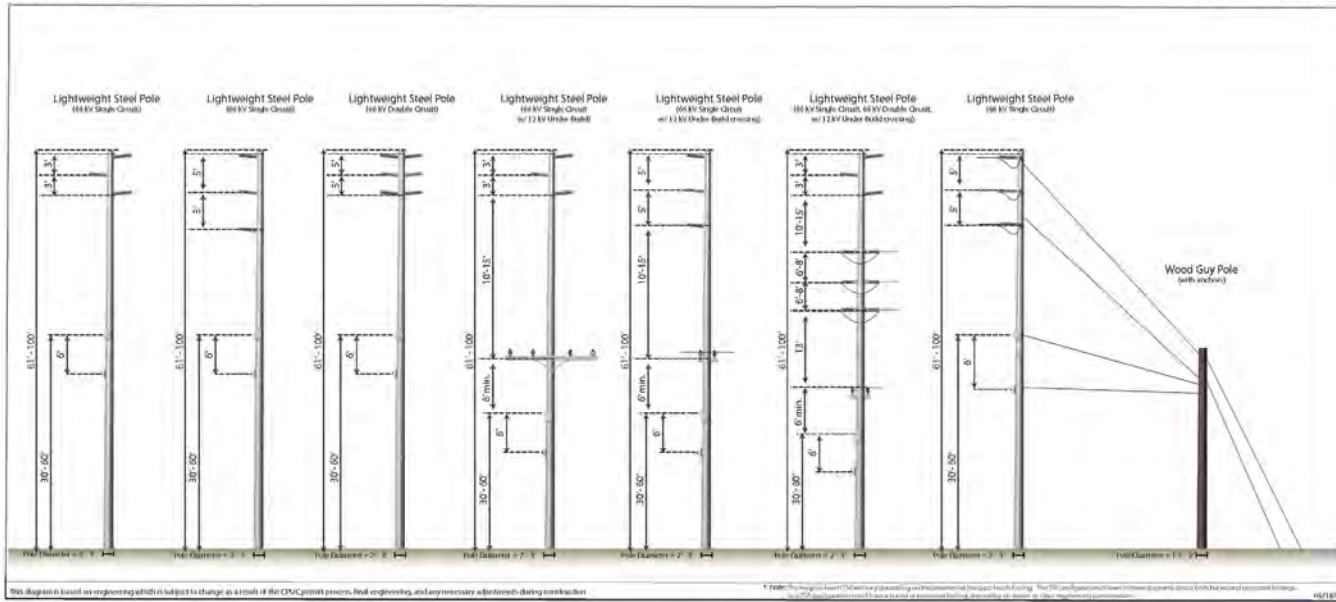




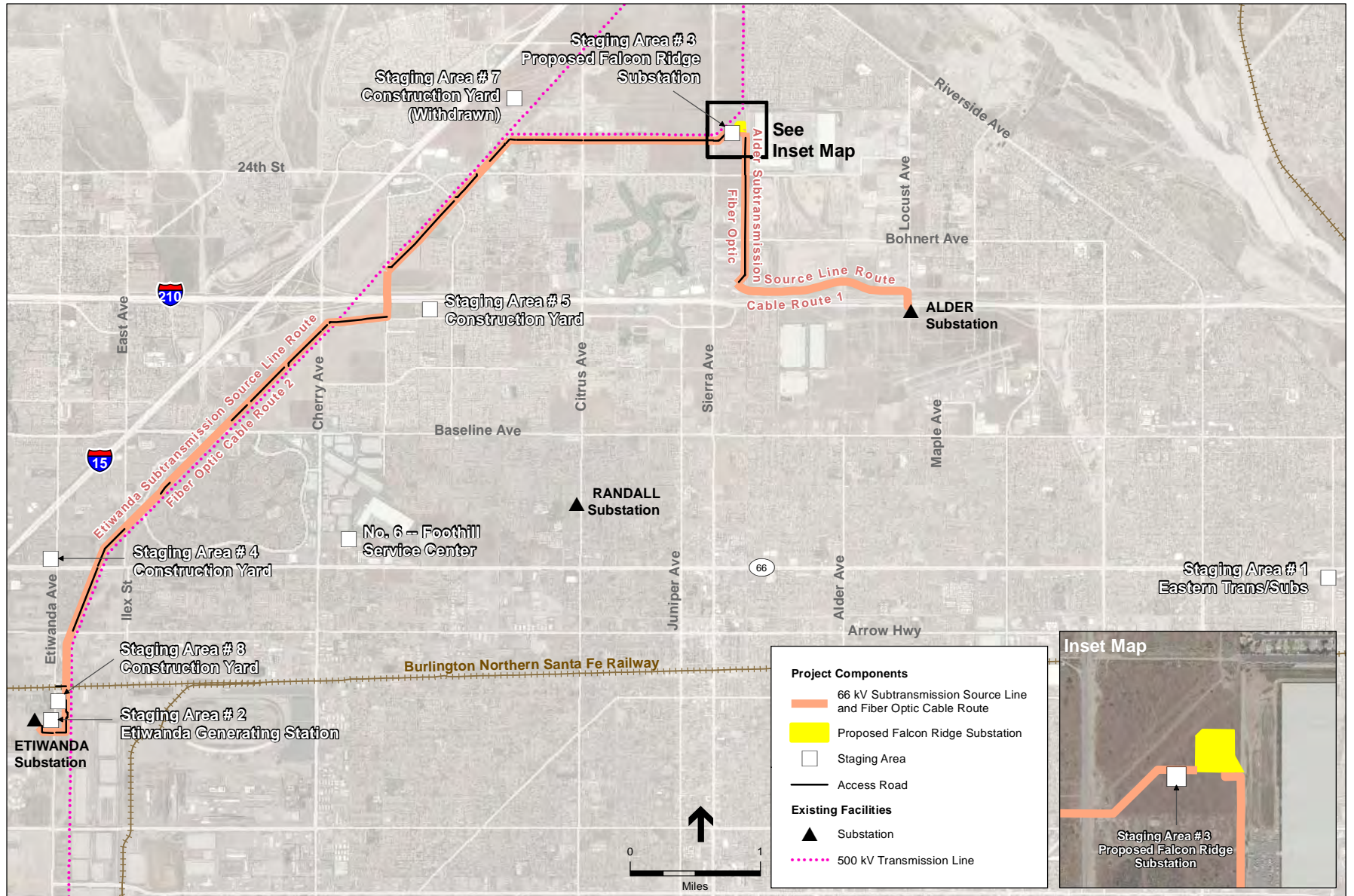
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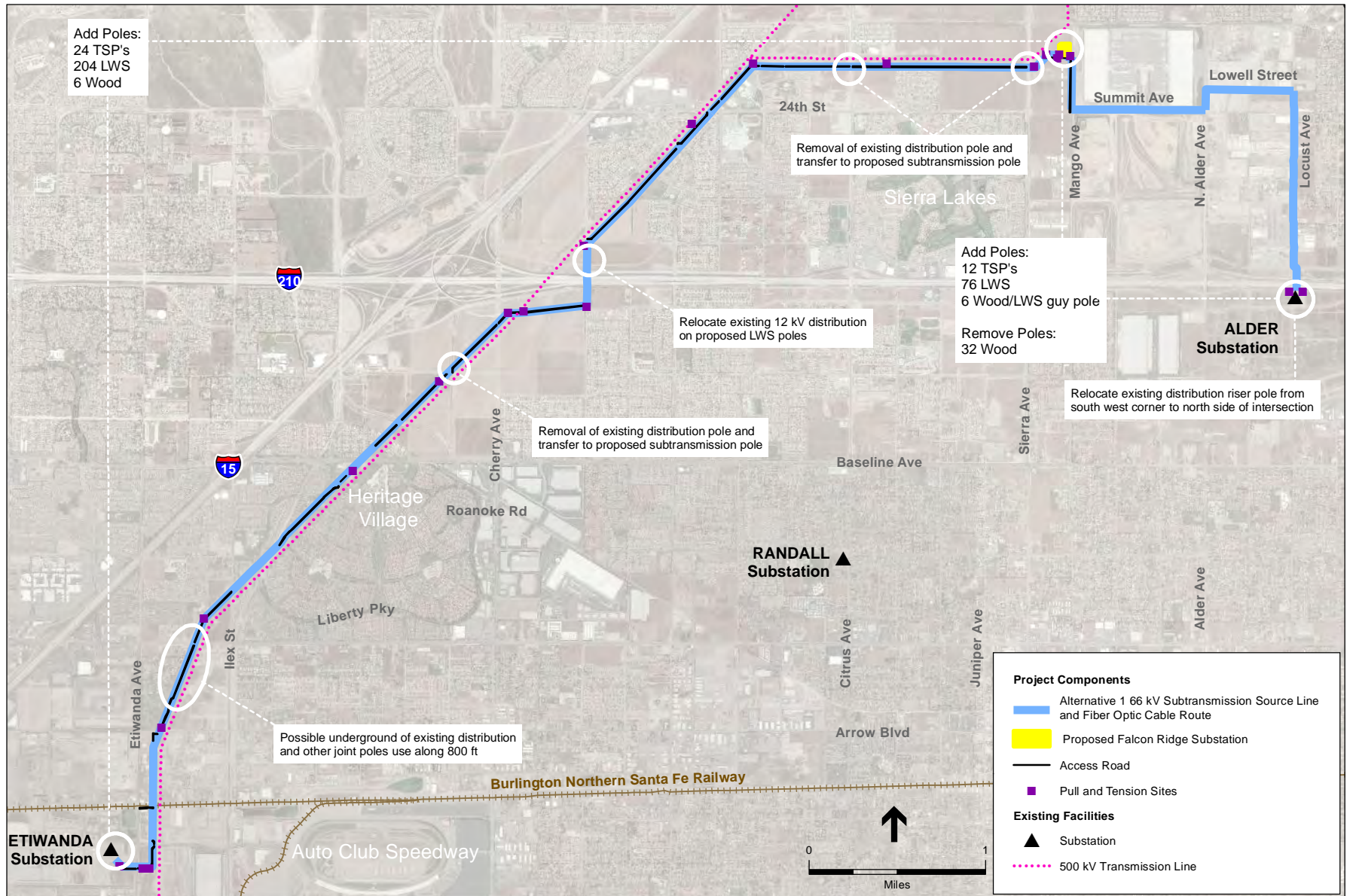
Falcon Ridge Substation Project . 207584.09

Figure 2-3
Substation Layout



NOTE: Please note the appearance of any LWS guy poles would be substantially similar to the appearance of a wood guy pole in terms of size and shape





SOURCE: SCE, 2011

Falcon Ridge Substation Project . 207584.09

Figure 3-1
Alternative 1: Lowell Street Realignment Alternative

APPENDIX H

Mitigation Monitoring, Reporting, and Compliance Program

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PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

MITIGATION MONITORING, REPORTING, AND COMPLIANCE PROGRAM

SOUTHERN CALIFORNIA EDISON'S FALCON RIDGE SUBSTATION PROJECT (APPLICATION NO. A.10-12-017)

INTRODUCTION

This document describes the mitigation monitoring, reporting, and compliance program (MMRCP) for ensuring the effective implementation of the mitigation measures required for the California Public Utilities Commission (CPUC, or Commission) approval of the Southern California Edison's (SCE) application to construct, operate, and maintain the Project. All mitigation measures are presented in Table H-1 provided at the end of this MMRCP.

If the Project is approved, this MMRCP would serve as a self-contained general reference for the Mitigation Monitoring, Reporting, and Compliance Program adopted by the Commission for the Project. If and when the Project is approved by the Commission, the CPUC will compile the Final MMRCP based on this Appendix H to the Final Environmental Impact Report (EIR) and any revisions to it that the CPUC may make during its EIR certification and permit approval processes.

California Public Utilities Commission – MMRCP Authority

The California Public Utilities Code in numerous places confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval be implemented properly, monitored, and reported on. In 1989, this requirement was codified statewide as §21081.6 of the Public Resources Code. Section 21081.6 requires a public agency to adopt a MMRCP when it approves a project that is subject to preparation of an EIR and where the EIR for the project identifies potentially significant environmental effects. California Environmental Quality Act (CEQA) Guidelines §15097 was added in 1999 to further clarify agency requirements for mitigation monitoring and reporting.

The purpose of a MMRCP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMRCP as a working guide to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

The Commission will address its responsibility under Public Resources Code §21081.6 when it takes action on SCE's applications. If the Commission approves the applications, it will also adopt a MMRCP that includes the mitigation measures ultimately made a condition of approval by the Commission.

Because the CPUC must decide whether or not to approve the SCE application and because the application may cause either direct or reasonably foreseeable indirect effects on the environment, CEQA requires the CPUC to consider the potential environmental impacts that could occur as the result of its decisions and to consider mitigation for any identified significant environmental impacts.

If the CPUC approves SCE's application for authority to construct and operate the substation, subtransmission source lines, distribution getaways, and telecommunications facilities, SCE would be responsible for implementation of any mitigation measures governing both construction and future operation of the Project. Though other state and local agencies would have permit and approval authority over construction of the transmission line, the CPUC would continue to act as the lead agency for monitoring compliance with all mitigation measures required by this EIR. All approvals and permits obtained by SCE would be submitted to the CPUC for mitigation compliance prior to commencing the activity for which the permits and approvals were obtained.

In accordance with CEQA, the CPUC reviewed the impacts that would result from approval of the application. The activities considered include the construction and operation of the new Falcon Ridge Substation, subtransmission source line segments, distribution getaways, and telecommunications facilities. The CPUC review concluded that Project implementation could result in significant unmitigable impacts on Aesthetics, Air Quality, and Noise. All other potential impacts could be mitigated to less-than-significant levels. SCE has agreed to incorporate all the proposed mitigation measures into the Project. The CPUC has included the stipulated mitigation measures as conditions of approval of the applications and has circulated a Draft EIR.

The attached EIR presents and analyzes potential environmental impacts that would result from construction, operation, and maintenance of the Project, and proposes mitigation measures as appropriate. Based on the EIR, approval of the application would have no impact or less-than-significant impacts in the following areas:

- Agriculture and Forestry Resources
- Energy Conservation
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Utilities and Service Systems

The EIR indicates that approval of the application would result in potentially significant impacts in the areas of:

- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Recreation
- Transportation and Traffic

The EIR indicates that approval of the application would result in significant unmitigable impacts in the in the areas of:

- Aesthetics
- Air Quality
- Noise

Roles and Responsibilities

As the lead agency under CEQA, the CPUC is required to monitor this project to ensure that the required mitigation measures and any Applicant Proposed Measures (APMs) are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this MMRCPP and has primary responsibility for implementation of the monitoring program. The purpose of the monitoring program is to document that the mitigation measures required by the CPUC are implemented and that mitigated environmental impacts are reduced to the level identified in the Program. The CPUC has the authority to halt any activity associated with the Project if the activity is determined to be a deviation from the approved project or the adopted mitigation measures.

The CPUC may delegate duties and responsibilities for monitoring to other mitigation monitors or consultants as deemed necessary. The CPUC will ensure that the person(s) delegated any duties or responsibilities are qualified to monitor compliance.

The CPUC, along with its mitigation monitor, will ensure that any variance process, which will be designed specifically for the Project, or deviation from the procedures identified under the monitoring program, is consistent with CEQA requirements; no Project variance will be approved by the CPUC if it creates new significant environmental impacts. As defined in this MMRCPP, a variance should be strictly limited to minor Project changes that will not trigger other permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. A proposed Project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved Project and adopted mitigation measures, including correction of such deviation, shall be reported immediately to the CPUC and the mitigation monitor assigned to the construction for their review and approval. In some cases, a variance may also require approval by a CEQA responsible agency.

Enforcement and Responsibility

The CPUC is responsible for enforcing the procedures for monitoring through the environmental monitor. The environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the CPUC. The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the Project if the activity is determined to be a deviation from the approved Project or adopted mitigation measures. The CPUC may assign its authority to their environmental monitor.

Mitigation Compliance Responsibility

SCE is responsible for successfully implementing all the adopted mitigation measures in this MMRCPP. The MMRCPP contains criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

SCE shall inform the CPUC and its mitigation monitor in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC in coordination with its mitigation monitor will assess whether alternative mitigation is appropriate and specify to SCE the subsequent actions required.

Dispute Resolution Process

This MMRCPP is expected to reduce or eliminate many of the potential disputes concerning the implementation of the adopted measures. However, in the event that a dispute occurs, the following procedure will be observed:

- **Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC's designated Project Manager for resolution. The Project Manager will attempt to resolve the dispute.
- **Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the Project or adopted Mitigation Monitoring Program.
- **Step 3.** If a dispute or complaint regarding the implementation or evaluation of the MMRCPP or the mitigation measures cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision, and serve it on the filer and other affected participants.
- **Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party(ies) may appeal it to the Commission via a procedure to be specified by the Commission.

Parties may also seek review by the Commission through existing procedures specified in the Commission's Rules of Practice and Procedure for formal and expedited relief.

General Monitoring Procedures

Mitigation Monitor

Many of the monitoring procedures will be conducted during the construction phase of the Project. The CPUC and the mitigation monitor are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with SCE. To oversee the monitoring procedures and to ensure success, the mitigation monitor assigned to the construction must be on site during that portion of construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The mitigation monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures require action on the part of the construction supervisors or crews for successful implementation. To ensure success, the following actions, detailed in specific mitigation measures included in the MMRCP, will be taken:

- Procedures to be followed by construction companies hired to do the work will be written into contracts between SCE and any construction contractors. Procedures to be followed by construction crews will be written into a separate agreement that all construction personnel will be asked to sign, denoting agreement.
- One or more pre-construction meetings will be held to inform all and train construction personnel about the requirements of the MMRCP.
- A written summary of mitigation monitoring procedures will be provided to construction supervisors for all mitigation measures requiring their attention.

General Reporting Procedures

Site visits and specified monitoring procedures performed by other individuals will be reported to the mitigation monitor assigned to the construction. A monitoring record form will be submitted to the mitigation monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the mitigation monitor. A checklist will be developed and maintained by the mitigation monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The mitigation monitor will note any problems that may occur and take appropriate action to rectify the problems. SCE shall provide the CPUC with written quarterly reports of the Project, which shall include progress of construction, resulting impacts, mitigation implemented, and all other noteworthy elements of the Project. Quarterly reports shall be required as long as mitigation measures are applicable.

Public Access to Records

The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the CPUC on request. The CPUC and SCE will develop a filing and tracking system.

Condition Effectiveness Review

In order to fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a MMRCP to ensure compliance during Project implementation (CEQA Guidelines §21081.6):

- The CPUC may conduct a comprehensive review of conditions which are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined above; and
- If in either review, the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, or that recent proven technological advances could provide more effective mitigation, then the CPUC may impose additional reasonable conditions to effectively mitigate these impacts.

These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

Mitigation Monitoring, Reporting, and Compliance Program

The table attached to this program presents a compilation of the mitigation measures in the EIR. The purpose of the table is to provide a single comprehensive list of impacts, mitigation measures, monitoring and reporting requirements, and timing.

SCE proposed the following APMs to minimize impacts on biological and paleontological resources from Project implementation. The impact analysis in this EIR assumed that these APMs would be implemented as part of the Project.

APM-BIO-01 Migratory Bird Treaty Act (MBTA) and Nesting Raptors: In order to avoid impacts on nesting birds and raptors (common or special status), Project initiation shall be scheduled outside the breeding season (i.e., March 15–September 15 for nesting birds; February 1–June 30 for nesting raptors). If Project timing requires that work be initiated during this time period, a pre-construction survey shall be conducted by a qualified Biologist for nesting birds and/or raptors within 7 days prior to clearing of any vegetation or any work within 500 feet of construction areas. If the Biologist does not find any active nests within the impact area, the vegetation clearing/construction work shall be allowed to proceed.

If the Biologist finds an active nest within the construction area and determines that the nest may be impacted or breeding activities substantially disrupted, the Biologist will delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. The active site will be protected until nesting activity has ended to ensure compliance with the MBTA and California Fish and Game Code. Encroachment into the buffer area

around a known nest shall only be allowed if the Biologist determines that the proposed activity would not disturb the nest occupants.

APM-BIO-02 Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Alluvial Fan Sage Scrub, Disturbed Riversidean Sage Scrub, and Annual Grassland/Disturbed Riversidean

Alluvial Fan Sage Scrub: Project impacts on sage scrub vegetation types would be avoided and/or minimized to the maximum extent practicable. Permanent impacts to disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub vegetation would be mitigated at a minimum replacement ratio of 1:1. Residual temporary impacts on undisturbed/disturbed Riversidean alluvial fan sage scrub would be restored on site and/or mitigated at a replacement ratio of 1:1. Permanent impacts on undisturbed Riversidean alluvial fan sage scrub would be mitigated at a replacement ratio of up to 3:1. Final compensation ratios for impacts to Riversidean alluvial fan sage scrub would be determined in consultation with USFWS and CDFG.

A detailed restoration program shall be prepared for approval by SCE and the appropriate resource agencies. Restoration shall consist of seeding and planting containers of appropriate Riversidean alluvial fan sage scrub species. The program shall include, at a minimum, the following items:

- Responsibilities and qualifications of the personnel to implement and supervise the plan.
- Site selection.
- Site preparation and planting implementation.
- Schedule.
- Maintenance plan/guidelines.
- Monitoring plan.
- Long-term preservation.

Additionally, the grading limits shall be clearly marked, and temporary fencing or other appropriate markers shall be placed around any sage scrub vegetation adjacent to work areas prior to the commencement of any ground-disturbing activity or native vegetation removal. No construction access, parking, or storage of equipment or materials shall be allowed within the marked areas. SCE shall be fully responsible for implementing the Riversidean Alluvial Fan Sage Scrub Revegetation Program until the restoration areas have met the success criteria outlined in the program. SCE and the appropriate resource agencies shall have final authority over mitigation area sign-off. The site shall be monitored and maintained for a suitable number of years to ensure successful establishment of Riversidean alluvial fan sage scrub habitat within the restored and created areas, as determined by the resource agencies.

In lieu of developing an offsite restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE would pay mitigation fees to a local conservation bank that would advance regional environmental objectives by restoring or purchasing contiguous habitat whose natural resource values, species composition and habitat types present are comparable to impacted habitat at the proposed Project site. For example, SCE has identified the Cajon Creek Conservation Bank as a suitable, local conservation bank to meet mitigation objectives under the guidance of the appropriate resource agencies.

APM-PA-01 Develop and Implement a Paleontological Monitoring Plan: A project paleontologist meeting the qualifications established by the Society of Vertebrate Paleontologists shall be retained by SCE to develop and implement a Paleontological Monitoring Plan prior to the start of ground disturbing activities for the Project. As part of the Paleontological Monitoring Plan, the project paleontologist shall establish a curation agreement with an accredited facility prior to the initiation of ground-disturbing activities. The Paleontological Monitoring Plan shall also include a final monitoring report. If fossils are identified, the final monitoring report shall contain an appropriate description of the fossils, treatment, and curation.

APM-PA-02 Paleontological Monitoring for the Project: A paleontological monitor shall be on site to spot check ground-disturbing activities at depths greater than 5 feet during installation of the Project. If very few or no fossils remains are found during ground disturbing activities monitoring time can be reduced or suspended entirely as per recommendations of the paleontological field supervisor. If fossils are found during ground disturbing activities, the paleontological monitor shall halt the ground-disturbing activities within 25 feet of the find in order to allow evaluation of the find and determination of appropriate treatment.

**TABLE H-1
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT**

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Aesthetics				
Impact 4.1-1: The Project would have an adverse effect on a scenic vista.	Mitigation Measure 4.1-1: SCE and/or its contractors shall use subtransmission line conductors that are non-specular and non-reflective and insulators that are non-reflective and non-refractive.	SCE and its contractors to implement measure as defined.	SCE to incorporate measures into final design plans. SCE to submit final design plans to the CPUC.	At least 30 days prior to commencement of construction activities.
Impact 4.1-3: Use of construction conductor/wire stringing set-up locations during the approximately 12-month construction period could result in temporary adverse impacts to visual quality.	Mitigation Measure 4.1-3: SCE and/or its contractors shall not place equipment at the conductor/wire stringing set-up locations more than 2 weeks prior to the required use.	SCE and its contractors to implement measure as defined.	CPUC mitigation monitor to monitor compliance.	During all phases of construction activities.
Impact 4.1-6: The Project would introduce new sources of substantial light or glare that would adversely affect day or nighttime views in the area.	Mitigation Measure 4.1-6: Implement Mitigation Measure 4.1-1.	See Mitigation Measure 4.1-1.	See Mitigation Measure 4.1-1.	See Mitigation Measure 4.1-1.
Agriculture and Forestry Resources				
No Impact	None Required	--	--	--
Air Quality				
Impact 4.3-1: Project construction activities would generate NO _x and PM10 emissions that could contribute substantially to violations of ozone and PM10 air quality standards.	Mitigation Measure 4.3-1a: For diesel-fueled off-road construction equipment of more than 50 horsepower, SCE shall make a good faith effort to use available construction equipment that meets the highest USEPA-certified tiered emission standards. An Exhaust Emissions Control Plan that identifies each unit's certified tier specification, Best Available Control Technology (BACT), and the CARB or SCAQMD operating permit number (if applicable) 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 3 emission standards, the Exhaust Emissions Control Plan shall include documentation from two local heavy construction equipment rental companies that	SCE and its contractors to implement measure as defined.	SCE to submit a copy of the Exhaust Emissions Control Plan to CPUC for review.	At least 30 days prior to commencement of construction activities.

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Air Quality (cont.)				
Impact 4.3-1 (cont.)	<p>indicates that the companies do not have access to higher tiered equipment for the given class of equipment.</p> <p>Mitigation Measure 4.3-1b: SCE and/or its contractors shall develop a Fugitive Dust Control Plan that specifically describes how compliance with each of SCAQMD Rule 403 Best Available Control Measures (BACMs) shall be achieved. If it is determined that any of the BACMs are not applicable to construction of the Project, the plan shall present rationale as to why the BACMs are not applicable and would not be implemented. This plan shall be submitted to the CPUC for review and approval at least 30 days prior to commencement of construction activities, and the approved plan shall be distributed to all employees and construction contractors working on the Project.</p>	SCE and its contractors to implement measure as defined.	SCE to submit a copy of the Fugitive Dust Control Plan to CPUC.	Submit plan to CPUC at least 30 days prior to commencement of construction activities.
Impact 4.3-3: Construction activities would generate emissions of criteria pollutants that would be cumulatively considerable.	Mitigation Measure 4.3-3: Implement Mitigation Measures 4.3-1a (Exhaust Emissions Control Plan) and 4.3-1b (Fugitive Dust Control Plan).	See Mitigation Measures 4.3-1a and 1b.	See Mitigation Measures 4.3-1a and 1b.	See Mitigation Measures 4.3-1a and 1b.
Biological Resources				
Impact 4.4-1: Construction activities could result in adverse impacts to special-status plant species.	<p>Mitigation Measure 4.4-1: Where avoidance of Riversidean sage scrub habitat is not possible, SCE shall compensate for losses through habitat creation and enhancement, and long-term preservation for temporary and permanent impacts by implementing the following measures:</p> <ul style="list-style-type: none"> SCE shall establish buffer zones and mitigate for the loss of special-status plant species and sensitive plant communities. SCE and their contractors shall avoid and minimize impacts to special-status plant species and sensitive plant communities to the maximum extent feasible. Avoidance will be carried out by establishing a visible buffer zone around sensitive areas prior to construction in coordination with a qualified biologist, redesigning or relocating proposed disturbance areas, locating staging areas within 	SCE and its contractors to implement measure as defined.	<p>SCE to incorporate measures into final design plans.</p> <p>CPUC mitigation monitor to monitor compliance.</p>	<p>Submit final design plans to CPUC at least 30 days prior to commencement of construction activities.</p> <p>During all phases of construction activities.</p>

**TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT**

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Impact 4.4-1 (cont.)	<p>disturbed areas when possible, or using other measures recommended by the CNPS (1998).</p> <ul style="list-style-type: none"> • SCE shall mitigate for Riversidean sage scrub vegetation losses at a minimum replacement ratio of 1:1. Residual temporary impacts on disturbed mule fat scrub and undisturbed/disturbed Riversidean sage scrub shall be restored on site and/or mitigated at a replacement ratio of 1:1. Permanent impacts on undisturbed Riversidean sage scrub shall be mitigated at a replacement ratio of up to 3:1. Final compensation ratios for impacts to Riversidean sage scrub shall be determined in consultation with the USFWS and CDFG. • As a component of the Program, SCE shall develop and implement a five-year restoration mitigation and monitoring program. The Program will be described in a Restoration Plan that shall be subject to approval by the USFWS, CDFG, and the CPUC. The Restoration Plan shall include: <ul style="list-style-type: none"> – detailed design drawings and specifications for the mitigation site(s), including site drawings, final grade elevations, an appropriately spaced planting plan, a plant species list showing the number of each plant species, and notes on proper site preparation (including temporary erosion and sediment control); – a discussion of ongoing maintenance practices to protect the mitigation site, including a minimum 5-year performance monitoring program with specific, measurable performance standards to evaluate mitigation success; – a contingency plan indicating actions and corrective measures to be taken if monitoring indicates performance standards are not being met; – a statement of financial assurance that the mitigation will be constructed, maintained, monitored, and contingencies implemented, if necessary; and – a plan for restoring temporarily disturbed areas. 			

**TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT**

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Impact 4.4-1 (cont.)	<ul style="list-style-type: none"> • SCE shall submit an annual vegetation monitoring report to the USFWS, CDFG, CPUC to document site compliance, advise of remedial actions that were undertaken during the previous monitoring year, and advise of restoration site management needs for the coming year. Reports shall be required for a minimum of five years following initial site restoration to document progress of mitigation areas toward attaining the minimum performance standards. • SCE shall revegetate all natural areas temporarily disturbed by project activities. Revegetation criteria will include general restoration concepts and methods, including the use of locally native plants, protection and restoration of soil conditions, and control of aggressive non-native plant species. The planting effort shall commence in the fall following completion of construction at a given site. If the project is expected to have an extended construction timeline, revegetation shall be completed as extensively as possible during each fall season. Interim revegetation by hydroseeding or with a seeding mixture and mulch using broadcast methods shall be implemented as necessary to control erosion in disturbed areas prior to final revegetation. The plant palette will include locally native plants such as California buckwheat, black sage, white sage, cane cholla, and California sagebrush. <p>As an alternative to developing an off-site restoration program for permanent impacts to Riversidean alluvial fan sage scrub, disturbed Riversidean alluvial fan sage scrub, disturbed Riversidean sage scrub, and annual grassland/disturbed Riversidean alluvial fan sage scrub, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.</p>			

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
<p>Impact 4.4-2: Construction activities associated with the Project could result in adverse impacts to Los Angeles pocket mouse and other non-listed special-status wildlife species.</p>	<p>Mitigation Measure 4.4-2: SCE and/or its contractors shall avoid impacts to occupied Los Angeles pocket mouse habitat to the maximum extent feasible in the final Project design. SCE shall define Los Angeles pocket mouse habitat as "off limits" in construction plans and specifications. If complete avoidance is not feasible, mitigation measures shall be implemented to reduce potential project impacts within occupied habitat to the maximum extent feasible. Such measures could include minimizing that portion of the project footprint that could encroach on an occupied habitat area and staging materials and work so as not to encroach into such an area. The presence of a Biological Monitor during Project construction shall be required to further ensure that any potential impacts to special-status wildlife species are avoided and minimized. For those impacts that cannot feasibly be avoided or further minimized, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.</p>	<p>SCE and its contractors to implement measure as defined.</p>	<p>CPUC mitigation monitor to monitor compliance.</p>	<p>During all phases of construction activities.</p>
<p>Impact 4.4-4: Operation of new transmission lines could impact raptors as a result of electrocution or collision.</p>	<p>Mitigation Measure 4.4-4: SCE shall follow Avian Power Line Interaction Committee guidelines for avian protection on powerlines. SCE shall use current guidelines to reduce bird mortality from interactions with powerlines. The Avian Power Line Interaction Committee (APLIC, 2006) and USFWS recommend the following:</p> <ul style="list-style-type: none"> • Provide 60-inch minimum horizontal separation between energized conductors or energized conductors and grounded hardware; • Insulate hardware or conductors against simultaneous contact if adequate spacing is not possible; and • Use pole designs that minimize impacts to birds. 	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to incorporate measures into final design plans.</p>	<p>Submit final design plans to CPUC at least 30 days prior to commencement of construction activities.</p>

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
<p>Impact 4.4-6: Construction within the existing Etiwanda Substation could impact federally protected wetlands.</p>	<p>Mitigation Measure 4.4-6a: SCE shall through Project design, avoid jurisdictional waters of the U.S. and waters of the state where feasible. This includes minimizing the footprint of facilities at the existing Etiwanda Substation that could impact jurisdictional areas and spanning drainages that occur in the Project area.</p>	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to incorporate measures into final design plans.</p> <p>CPUC mitigation monitor to monitor compliance.</p>	<p>Submit final design plans to CPUC at least 30 days prior to commencement of construction activities.</p> <p>During all phases of construction activities.</p>
	<p>Mitigation Measure 4.4-6b: In the event of any Project changes that involve ground disturbance outside the boundary of the Jurisdictional Delineation Report (BonTerra, 2010e), a new wetland delineation shall be performed.</p>	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to incorporate measures into final design plans.</p> <p>CPUC mitigation monitor to monitor compliance.</p>	<p>Submit final design plans to CPUC at least 30 days prior to commencement of construction activities.</p> <p>During all phases of construction activities.</p>
	<p>Mitigation Measure 4.4-6c: Where jurisdictional wetlands and other waters cannot be avoided at the Etiwanda Substation, to offset anticipated temporary impacts that would occur as a result of the Project, the original contours and character of disturbed jurisdictional areas shall be restored. A minimum replacement ratio of 1:1, or as otherwise agreed to by the resource agencies, would be required to ensure that there would be no net loss of habitat value. Disturbed portions of jurisdictional areas shall be reseeded with an appropriate mix of native species that are appropriate to the site to prevent locally abundant non-native plants such as cocklebur from colonizing disturbed areas.</p>	<p>SCE and its contractors to implement measure as defined.</p>	<p>CPUC mitigation monitor to monitor compliance.</p>	<p>During all phases of construction activities.</p>
<p>Impact Alternative 15-BIO-1: Construction activities associated with the Project could result in adverse impacts to San Bernardino kangaroo rat.</p>	<p>Mitigation Measure Alternative 15-BIO-1: A habitat assessment for San Bernardino kangaroo rat shall be conducted by a qualified biologist within the Flood Control District ROW Alternative if this route is approved. If no potential occupied habitat is found during this assessment, then no further action would be necessary. If potential or occupied habitat is identified, USFWS protocol-level trapping surveys shall be performed. Based on survey findings, two potential outcomes are possible:</p>	<p>SCE and its contractors to implement measure as defined.</p>	<p>CPUC mitigation monitor to monitor compliance.</p>	<p>During all phases of construction activities, if Alternative 15 is selected.</p>

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
Impact Alternative 15-BIO-1 (cont.)	<ul style="list-style-type: none"> If San Bernardino kangaroo rats are not identified during trapping, no impact would occur and no further action would be required. If San Bernardino kangaroo rats are detected during surveys, an alternate alignment could be selected or the route altered to completely avoid all potential or occupied habitat for this species. If complete avoidance is not feasible, minimization measures shall be implemented to reduce potential project impacts within occupied habitat to the maximum extent feasible. Such measures could include minimizing that portion of the project footprint that could encroach on an occupied habitat area, surveying and establishing exclusionary perimeter fencing around such areas, and staging materials and work so as not to encroach into them. The presence of a Biological Monitor during Project construction shall be required to further ensure that any potential impacts to special-status wildlife species are avoided and minimized. For those impacts that cannot feasibly be avoided or further minimized, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFG-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements. 			
Impact Alternative 15-BIO-2: Construction activities could result in adverse impacts to special-status plant species.	<p>Mitigation Measure Alternative 15-BIO-2: If the Flood Control District ROW Alternative is selected, portions of the proposed alignment that have not been surveyed to determine the potential presence or absence of special-status plants shall be surveyed following the most recent CDFG rare plant survey protocol (CDFG, 2009). Following surveys, two potential outcomes are possible:</p> <ul style="list-style-type: none"> If special-status plants are not identified during focused surveys, impacts would not be anticipated and no further action would be required. If special-status plants are identified during surveys, the implementation of Mitigation Measure 4.4-1 would reduce potential impacts to a less-than-significant level. 	SCE and its contractors to implement measure as defined.	SCE to incorporate measures into final design plans. CPUC mitigation monitor to monitor compliance.	If Alternative 15 is selected, submit final design plans to CPUC at least 30 days prior to commencement of construction activities. During all phases of construction activities.

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Biological Resources (cont.)				
<p>Impact Staging Area-BIO-1: Construction activities could result in adverse impacts to special-status plant species.</p>	<p>Mitigation Measure Staging Area-BIO-1: Potential Staging Area No. 8 shall be surveyed prior to the commencement of any activities that may modify vegetation, such as clearing or ground-breaking activities, following the most recent CDFG rare plant survey protocol (CDFG, 2009). Following surveys, two potential outcomes are possible:</p> <ul style="list-style-type: none"> • If special-status plants are not identified during focused surveys or surveys indicate that special-status plant habitat does not occur on-site, impacts would not be anticipated and no further action would be required. • If special-status plants are identified during surveys, compensation for the losses shall be required by implementing Mitigation Measure 4.4-1, which would result in habitat creation and enhancement, and long-term preservation for temporary and permanent impacts. 	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to incorporate measures into final design plans.</p> <p>CPUC mitigation monitor to monitor compliance.</p>	<p>If Staging Area No. 8 is selected, submit final design plans to CPUC at least 30 days prior to commencement of construction activities.</p> <p>During all phases of construction activities.</p>
Cultural Resources				
<p>Impact 4.5-1: Project construction could cause an adverse change in the significance of a historical resource [inclusive of archaeological resources] which is either listed or eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, or a local register of historic resources; or to a unique archaeological resource.</p>	<p>Mitigation Measure 4.5-1: Cease Work if Subsurface Archaeological Resources are Discovered During Ground-Disturbing Activities. If archaeological resources are encountered during Project-related activity, SCE and/or its contractors shall cease all activity within 100 feet of the find until the find can be evaluated by a qualified archaeologist. If the archaeologist determines that the resources are significant, the archaeologist shall notify the CPUC and the resource shall be avoided if feasible. If avoidance is infeasible, a Treatment Plan that documents the research approach and methods for data recovery shall be prepared and implemented in consultation with CPUC and with appropriate Native American representatives (if the resources are prehistoric or Native American in nature). Work may proceed on other parts of the Project area while treatment is being carried out.</p>	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to submit Historic Properties Treatment Plan to the CPUC staff for review.</p>	<p>Submit plan to CPUC at least 30 days prior to commencement of construction activities.</p>

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
<p>Impact 4.5-2: Project implementation would have a potentially significant impact on a unique paleontological resource or site or unique geological feature.</p>	<p>Mitigation Measure 4.5-2: Prior to the initiation of any site preparation or start of construction, SCE and/or its contractors shall contract with a qualified vertebrate paleontologist, who shall be responsible for preparing and implementing a paleontological monitoring plan. The paleontologist must be a practicing scientist who is recognized in the paleontologic community, and is proficient in vertebrate paleontology, as demonstrated by institutional affiliations or appropriate credentials, ability to recognize and recover vertebrate fossils in the field, local geological and biostratigraphic expertise, and publications in scientific journals. The qualified paleontologist shall be available “on-call” to SCE and/or its contractors throughout the duration of ground-disturbing activities. At a minimum, the scope of services shall include:</p> <ul style="list-style-type: none"> Preparation of a paleontological monitoring plan based on final project design. The qualified professional paleontologist shall review information presented in this EIR, existing fossil localities in the region, Project grading plans and all geological/geotechnical reports developed to date to determine with greater precision the depth and extent of geologic units of high paleontological potential (e.g. older alluvial fan deposits) within the areas to be excavated. Based on the volume, depth and extent of soil excavations and the professional judgment of the paleontologist, he or she shall prepare a paleontological monitoring plan describing the locations/phases of project construction activity where paleontological monitoring of ground-disturbing activities would be needed. The monitoring plan shall outline procedures to follow in the event of discovery of a potentially significant fossil resource and shall describe the assessment and salvage procedures to be followed. The report shall also identify a paleontological repository (i.e., a publicly supported, not-for-profit museum or university employing a permanent curator) that is willing and able to accept and curate any fossil specimens recovered from Project construction sites. Construction of the Project shall not proceed until the report has been reviewed and approved by the CPUC. 	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to submit paleontological monitoring plan to the CPUC staff for review.</p> <p>CPUC mitigation monitor to monitor compliance.</p>	<p>Submit plan to CPUC at least 30 days prior to commencement of construction activities.</p> <p>During all phases of construction activity.</p>

**TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT**

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
<p>Impact 4.5-2 (cont.)</p>	<ul style="list-style-type: none"> Active monitoring of construction sites for paleontological resources. During construction of the Project, paleontological monitoring will consist of periodically inspecting disturbed, graded, and excavated surfaces, as well as soil stockpiles and disposal sites, as identified in the paleontological monitoring plan. The monitor (which will be the professional paleontologist or a designee) will have authority to divert grading or excavation away from exposed surfaces temporarily in order to examine disturbed areas more closely, and/or recover fossils. The monitor will coordinate with the construction manager to ensure that monitoring is thorough but does not result in unnecessary delays. If the monitor encounters a paleontological resource, he or she shall assess the fossil, and record or salvage it, as described below. Assessment and salvage of potential fossil finds. If potential fossils are discovered incidentally by construction crews, or in areas being actively monitored, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately until the qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the monitor may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The monitor may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations will be consistent with SVP guidelines (SVP, 1995; SVP, 1996) and currently accepted scientific practice, and shall be subject to review and approval by the CPUC. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in the paleontological repository, and may also include preparation of a report for publication describing the finds. SCE and/or its contractors will be responsible for ensuring that treatment is implemented and reported to the CPUC. If no report is required, SCE 			

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
Impact 4.5-2 (cont.)	and/or its contractors will nonetheless ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.			
Impact 4.5-3: Project construction could result in damage to previously unidentified human remains.	Mitigation Measure 4.5-3: If human remains are uncovered during Project construction, SCE and/or its contractors shall immediately halt all work in the immediate vicinity, and SCE's archaeologist or cultural resources consultant shall contact the county coroner to evaluate the remains and shall follow the procedures and protocols set forth in CEQA Guidelines §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 Health and Safety Code §7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). Per Public Resources Code 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 the SCE archaeologist and/or its cultural resources contractor has discussed and conferred, as prescribed in this section (PRC 5097.98), with the most likely descendents regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.	SCE and its contractors to implement measure as defined.	If human remains are discovered, SCE is to notify the CPUC and San Bernardino County coroner immediately.	During all phases of construction activities.
Impact Alternative 1-CUL-1: Project construction could cause an adverse change in the significance of a historical resource [inclusive of archaeological resources] which is either listed or eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, or a local register of historic resources, or a unique archaeological resource.	Mitigation Measure Alternative 1-CUL-1: SCE and/or its contractors shall retain a qualified archaeologist (defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology) to survey those portions of the final selected Project footprint that have not been previously subjected to systematic pedestrian cultural resources survey. After additional archaeological survey is carried out, the archaeologist shall prepare a report, for approval by the CPUC, that summarizes the survey efforts, and evaluates any identified cultural resources for their eligibility for listing in the National Register, California Register, or local register, or as a unique archaeological resource pursuant to §15064.5. Any resources determined to be significant shall be	SCE and its contractors to implement measure as defined.	SCE to submit Archaeological Survey Report to CPUC for review. If needed, SCE to submit Treatment Plan to CPUC for review.	If Alternative 1 is selected, Complete survey and submit report and Treatment Plan (if needed) to the CPUC at least 30 days prior to commencement of construction activities.

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cultural Resources (cont.)				
Impact Alternative 1-CUL-1 (cont.)	avoided if feasible. If avoidance is infeasible, a Treatment Plan that documents the research approach and methods for data recovery shall be prepared and implemented in consultation with CPUC and with appropriate Native American representatives (if the resources are prehistoric or Native American in nature).			
Energy Conservation				
Less than Significant	None Required	--	--	--
Geology and Soils				
Less than Significant	None Required	--	--	--
Greenhouse Gas Emissions				
Less than Significant	None Required	--	--	--
Hazards and Hazardous Materials				
Impact 4.9-1: Project construction, operation and maintenance would require the use of certain materials such as fuels, oils, solvents, and other chemical products that could pose a potential hazard to the public or the environment during routine transport, use or disposal.	Mitigation Measure 4.9-1: SCE and/or its contractors shall prepare and implement a Health and Safety Plan in accordance with applicable regulations prior to construction. The health and safety plan shall identify the chemicals potentially present in soil, health and safety hazards associated with those chemicals, monitoring to be performed during site activities, soil handling methods required to minimize the potential for harmful exposures, appropriate personnel protective equipment, and emergency response procedures. The plan shall be submitted to the CPUC for approval prior to commencement of construction activities and shall be distributed to all construction crew members prior to construction and operation of the Project.	SCE and its contractors to implement measure as defined.	SCE to submit Health and Safety Plan to CPUC for review.	At least 30 days prior to commencement of construction activities.
Impact 4.9-5: The Project would reduce compliance with an adopted emergency response plan or emergency evacuation plan.	Mitigation Measure 4.9-5: Implement Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hazards and Hazardous Materials (cont.)				
<p>Impact 4.9-6: Construction, operation and maintenance-related activities in high fire hazard areas could ignite dry vegetation and start a fire.</p>	<p>Mitigation Measure 4.9-6: SCE and/or its contractors shall prepare and implement a Fire Prevention and Emergency Response Plan to ensure the health and safety of construction workers, SCE personnel, and the public during Project construction and operation. The Fire Prevention and Emergency Response Plan shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Two water trucks each of 4,000-gallon capacity, equipped with 50 feet of fast-response hose with fog nozzles, shall be on-site during construction for immediate response to fire incidents, unless this provision is amended by the fire jurisdictions. • Each Project construction site (if construction occurs simultaneously at various locations) and the proposed Falcon Ridge substation shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires. • All construction workers and SCE personnel visiting the substation and/or subtransmission source lines to perform maintenance activities shall receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire. • The SBCFD and local fire departments shall be consulted during plan preparation and fire safety measures recommended by the agencies included. • The plan shall list fire prevention procedures and specific emergency response and evacuation measures that would be required to be followed during emergency situations. • The plan shall be submitted to the CPUC for approval prior to commencement of construction activities and shall be distributed to all construction crew members prior to construction and to all SCE personnel visiting the substation during operation and maintenance of the Project. 	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to submit Fire Prevention and Emergency Response Plan and evidence of consultation with SBCFD and local fire departments to CPUC for review.</p>	<p>At least 30 days prior to commencement of construction activities.</p>

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Hydrology and Water Quality				
Less than Significant	None Required	--	--	--
Land Use				
Less than Significant	None Required	--	--	--
Mineral Resources				
Less than Significant	None Required	--	--	--
Noise				
<p>Impact 4.13-1: Construction activities would violate City of Rancho Cucamonga exterior noise standards.</p>	<p>Mitigation Measure 4.13-1: SCE and/or its contractors shall develop a Construction Noise Reduction Plan in coordination with the City of Rancho Cucamonga to be implemented for construction activities within the City of Rancho Cucamonga. The Plan shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. The Plan shall include, but not be limited to, the following measures for construction activities:</p> <ul style="list-style-type: none"> • Publish and distribute to the potentially affected community within 200 feet, a telephone number, which shall be attended during active construction working hours, for use by the public to register complaints. All complaints shall be logged noting date, time, complainants' name, nature of complaint, and any corrective action taken. • All construction equipment shall have intake and exhaust mufflers recommended by the manufacturers thereof, to meet relevant noise limitations. • Maximize physical separation, as far as practicable, between noise sources (construction equipment) and noise receptors. Separation may be achieved by providing enclosures for stationary items of equipment and noise barriers around particularly noisy areas at the project sites and by locating stationary equipment to minimize noise impacts on the community. 	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to submit Construction Noise Reduction Plan to CPUC for review and approval.</p> <p>CPUC mitigation monitor to monitor compliance.</p>	<p>At least 30 days prior to commencement of construction activities.</p> <p>During all phases of construction activities.</p>

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Noise (cont.)				
Impact 4.13-1 (cont.)	<ul style="list-style-type: none"> Utilize construction noise barriers such as paneled noise shields, barriers, or enclosures adjacent to or around noisy equipment associated with construction activities, including access road construction, steel pole installation and wood pole removal, etc., in the immediate vicinity (i.e., within 200 feet) of sensitive receptors. Noise control shields shall be made featuring a solid panel and a weather-protected, sound-absorptive material on the construction-activity side of the noise shield. Shields used during linear construction activities shall be readily removable and moveable so that they may be repositioned, as necessary, to provide noise abatement for construction activities located near City of Rancho Cucamonga residential receptors. 			
Impact 4.13-5: Construction-related noise levels would increase ambient noise levels in the vicinity of the Project.	<p>Mitigation Measure 4.13-5: In the event that nighttime construction activity is determined to be necessary within 1,000 feet of sensitive receptors, SCE shall develop a Nighttime Noise and Nuisance Reduction Plan that shall be submitted to the CPUC for review and approval prior to the commencement of construction activities. The plan shall include a set of site-specific noise attenuation measures that apply state of the art noise reduction technology to ensure that nighttime construction noise levels and associated nuisances are reduced to the extent feasible.</p> <p>The attenuation measures may include, but not be limited to, the control strategies and methods for implementation that are listed below. If any of the following strategies are determined by SCE to not be feasible, an explanation as to why the specific strategy is not feasible shall be included in the Nighttime Noise and Nuisance Reduction Plan.</p> <ul style="list-style-type: none"> Plan construction activities to minimize the amount of nighttime construction. Offer temporary relocation of residents within 200 feet of nighttime construction activities. 	SCE and its contractors to implement measure as defined.	SCE to submit Construction Noise Reduction Plan to CPUC for review and approval. CPUC mitigation monitor to monitor compliance.	At least 30 days prior to commencement of construction activities. During all phases of construction activities.

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Noise (cont.)				
Impact 4.13-5 (cont.)	<ul style="list-style-type: none"> • Temporary noise barriers, such as shields and blankets, shall be installed immediately adjacent to all nighttime stationary noise sources (e.g., auger rigs, bore rigs, generators, pumps, etc.). • Install temporary noise barriers that block the line of sight between nighttime activities and the closest residences within 1,000 feet. • Publish and distribute to the potentially affected community within 1,000 feet of pending nighttime construction activities, a telephone number, which shall be attended during nighttime construction working hours, for use by the public to register complaints. All complaints shall be logged noting date, time, complainants' name, nature of complaint, and any corrective action taken. 			
Population and Housing				
Less than Significant	None Required	--	--	--
Public Services				
No Impact	None Required	--	--	--
Recreation				
Impact 4.16-1: The Project could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.	Mitigation Measure 4.16-1: SCE shall coordinate with the City of Fontana Community Services Department to ensure that appropriate warning signs are posted alerting pedestrians and park users to pedestrian pathway and park closures and informing users about nearby alternative recreational resources, such as Koehler and North Fontana parks.	SCE and its contractors to implement measure as defined.	SCE to submit proposed warning signs to the CPUC for review. CPUC mitigation monitor to monitor compliance.	At least 15 days prior to commencement of construction activities. During all phases of construction activities.

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Transportation and Traffic				
<p>Impact 4.17-1: Project construction would cause temporary increases in traffic volumes on area roadways, and would temporarily reduce roadway capacity and increase traffic delays on area roadways or cause conflicts with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation.</p>	<p>Mitigation Measure 4.17-1: SCE and/or its contractor shall prepare and implement a traffic control plan to reduce construction related traffic impacts on the roadways at, and near the work site, as well as to reduce potential traffic safety hazards and ensure adequate access for emergency responders. SCE and/or its contractor shall coordinate development and implementation of this plan with jurisdictional agencies (e.g., San Bernardino County, Fontana, Rialto, Rancho Cucamonga, San Bernardino), as appropriate. To the extent applicable, the traffic control plan shall conform to Part 6 (Temporary Traffic Control) of the California Manual on Uniform Traffic Control Devices (Caltrans, 2010), and shall include, but not be limited to, the following elements:</p> <ul style="list-style-type: none"> • Circulation and detour plans to minimize impacts on local road circulation during road and lane closures. Flaggers and/or signage shall be used to guide vehicles through and/or around the construction zone. • Identifying truck routes designated by San Bernardino County and local jurisdictions. Haul routes that minimize truck traffic on local roadways shall be utilized to the extent possible. • Providing sufficient-sized staging areas for trucks accessing construction zones to minimize disruption of access to adjacent public right-of-ways. • Controlling and monitoring construction vehicle movement through the enforcement of standard construction specifications by on-site inspectors. • Scheduling truck trips outside the peak morning and evening commute hours to the extent possible. • Limiting the duration of road and lane closures to the extent possible. • Maintaining pedestrian and bicycle access and circulation during Project construction where safe to do so. If construction activities encroach on a bicycle routes or multi-use paths, advance warning signs (e.g., "Bicyclists Allowed Use of Full Lane" and/or "Share the Road") shall be posted that indicate the presence of such users. 	<p>SCE and its contractors to implement measure as defined.</p>	<p>SCE to submit Traffic Control Plan and evidence of coordination with local jurisdictions (encroachment permits, traffic control permits, etc.) to CPUC.</p> <p>CPUC mitigation monitor to monitor compliance.</p>	<p>At least 15 days prior to commencement of construction activities.</p> <p>During all phases of construction activities.</p>

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Transportation and Traffic (cont.)				
Impact 4.17-1 (cont.)	<ul style="list-style-type: none"> • Identifying detours for bicycles and pedestrians, where applicable, in all areas where maintaining pedestrian and bicycle access and circulation during Project construction cannot be safely done. • Storing all equipment and materials in designated contractor staging areas on or adjacent to the worksite, such that traffic obstruction is minimized. • Implementing roadside safety protocols. Advance "Road Work Ahead" warning and speed control signs (including those informing drivers of state-legislated double fines for speed infractions in a construction zone) shall be posted to reduce speeds and provide safe traffic flow through the work zone. • Providing advance notification to administrators of police and fire stations (including fire protection agencies), ambulance service providers, and recreational facility managers of the timing, location, and duration of construction activities and the locations of detours and lane closures, where applicable. Maintain access for emergency vehicles within, and/or adjacent to, roadways affected by construction activities at all times. • Repairing and restoring affected roadway rights-of way to their original condition after construction is completed. 			
Impact 4.17-4: The Project could substantially increase hazards due to a design feature or incompatible uses.	Mitigation Measure 4.17-4: Implement Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.
Impact 4.17-5: Project construction could temporarily result in inadequate access to adjacent roadways and land uses for both general and emergency vehicles.	Mitigation Measure 4.17-5: Implement Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Transportation and Traffic (cont.)				
Impact 4.17-6: The Project could conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	Mitigation Measure 4.17-6: Implement Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.	See Mitigation Measure 4.17-1.
Utilities and Service Systems				
Less than Significant	None Required	--	--	--
Cumulative Effects				
Impact CUMULATIVE-TRANS: The Project's contribution to traffic increases and safety hazards on local and regional roads could be cumulatively considerable.	Mitigation Measure CUMULATIVE-TRANS: Coordinated Transportation Management Plan. The Applicant and its construction management contractor(s) shall work with San Bernardino County and local jurisdictions (as appropriate) to prepare and implement a transportation management plan for roadways adjacent to and directly affected by the planned well facilities and pipeline alignments, and to address the transportation impact of the multiple overlapping construction projects within the vicinity of the projects in the region. The transportation management plan shall include, but not be limited to, the following requirements: <ul style="list-style-type: none"> • Coordination of individual traffic control plans for the Project and other projects. • Coordination between the contractor(s) and Applicant in developing circulation and detour plans that include safety features (e.g., signage and flaggers). The circulation and detour plans shall address: <ul style="list-style-type: none"> – Full and partial roadways closures – Circulation and detour plans to include the use of signage and flagging to guide vehicles through and/or around the construction zone, as well as any temporary traffic control devices – Bicycle and transit detour plans, where feasible 	SCE and its contractors to implement measure as defined.	SCE to submit Coordinated Transportation Management Plan and evidence of coordination with local jurisdictions to CPUC. CPUC mitigation monitor to monitor compliance.	At least 15 days prior to commencement of construction activities. During all phases of construction activities.

TABLE H-1 (continued)
MITIGATION MONITORING, REPORTING AND COMPLIANCE PROGRAM FOR THE FALCON RIDGE SUBSTATION PROJECT

Environmental Impact	Mitigation Measures Proposed in this EIR	Implementing Actions	Monitoring/Reporting Requirements	Timing
Cumulative Effects (cont.)				
Impact CUMULATIVE-TRANS (cont.)	<ul style="list-style-type: none"> - Parking along arterial and local roadways - Haul routes for construction trucks and staging areas for instances when multiple trucks arrive at the work sites - A public information outreach program to notify nearby residents and businesses in the area of construction activities • Establishment of protocols for updating the transportation management plan to account for delays or changes in the schedules of individual projects. 			

APPENDIX I

Falcon Ridge Substation Project Intex Alternative

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memorandum

date May 17, 2013
to John Boccio
from Janna Scott and Al Kostalas
subject Falcon Ridge Substation Project Intex Alternative

Introduction

This memorandum provides additional analysis about proposed alternatives to the Falcon Ridge Substation Project, proposed by Southern California Edison (SCE) and located in the cities of Fontana, Rialto, Rancho Cucamonga, and unincorporated San Bernardino County (the "Project").

The Draft EIR for the Project was circulated for agency and public review in January, 2012. Comments received on the Draft EIR proposed a new alternative that had not been analyzed in the Draft EIR. SCE was invited to provide input on the reasonableness and feasibility of the proposal. The Final EIR, which was published in October, 2012, documented the analysis of potential impacts of the new alternative (called the "Flood Control District ROW Alternative," or "FCD ROW Alternative") on all resource areas, and found the new alternative to be environmentally superior not only to the Project as proposed, but also to the alternative that the Draft EIR had identified as environmentally superior.

After the Final EIR was published and before the Commission considered the Final EIR for certification, SCE provided additional input regarding the feasibility of the FCD ROW Alternative and proposed a variation of it for the Commission's consideration. This memorandum summarizes SCE's additional input on the FCD ROW Alternative, describes the proposed variation (called the "Intex Alternative"), and provides additional environmental analysis. As explained below, the Intex Alternative is environmentally superior to the Project.

Subsequent Inquiry Reveals the FCD ROW Alternative to be Infeasible

SCE has concluded, based on subsequent inquiry, that the FCD ROW Alternative is infeasible for technical reasons. After reviewing their submittal, we agree. As described in Final EIR Section 2.5.2, the FCD ROW Alternative proposed to place a portion of the Etiwanda Subtransmission Source Line within a 30-foot ROW consisting of a 20-foot ROW on San Bernardino County Flood Control District (SBFCD) property and a 10-foot ROW on land within the Westgate Specific Plan area of Fontana that is owned by Intex Properties. That alternative would have the 66 kV subtransmission line continue within the existing 500 kV ROW until it reaches a ROW owned and maintained by the SBFCD for flood control purposes (the "SBFCD ROW"). From there, the

FCD ROW Alternative would continue eastward, parallel to and within the SBFCFCD ROW to the intersection of San Sevaine Road, where it would reconnect with the Applicant-proposed route before crossing Interstate-210 (I-210) perpendicularly. In so doing, the FCD ROW Alternative would cross the back of the Intex property near the existing flood control channel and freeway rather than along South Highland Avenue in an area that is proposed for business park use as part of the West Gate Specific Plan. The FCD ROW Alternative otherwise would be the same as the Project described in Draft EIR Chapter 2.

SCE contends that construction of the FCD ROW Alternative would not be technically feasible because the area between the SBFCFCD access road and the property line fence varies in width between approximately 9 and 14 feet and is subject to a side slope that varies in elevation between approximately 4 and 6 feet. Consequently, increased pole setting depths would be required. Additionally, the SBFCFCD access road is approximately 20 feet wide and is made of asphalt paving (the north edge of the road is bound by the top of the southerly concrete flood channel wall, and the southerly edge is bound by the top of the slope). The trucks and equipment used to construct and maintain the 66 kV underground and overhead source lines can weigh in excess of 57,000 pounds and have an outrigger spread of 15 to 25 feet. SCE explains that this equipment, with outriggers extended, would damage the asphalt road at the top of the slope. The methods of installing the underground duct structures, bolted-base steel pole foundations, and pole holes for the tangent line poles on the side slope could undermine the SBFCFCD access road, and this could cause the boom trucks used for line construction to lose footing and roll over. The FCD ROW Alternative as described also would require temporary removal of the flood control fence and extensive ground disturbance because all excavation and construction of underground duct structures, tubular steel pole (TSP) foundations, and pole holes, as well as job site pole deliveries, would need to be done from the Intex property. Once the Intex property is fully developed, any future major maintenance on the 66 kV source line (such as pole replacements) would be nearly impossible due to restricted access and lack of room for equipment. To avoid these technical issues, SCE met with SBFCFCD and Intex to discuss the feasibility of placing the 66 kV subtransmission line entirely on Intex's property, and now proposes an alternative that does so.

Proposed New Alternative: The Intex Alternative

The Intex Alternative proposed by SCE (and resulting from discussions with the SBFCFCD and Intex) would have a similar alignment to the FCD ROW Alternative, but the ROW would be located entirely on Intex property, rather than on a combination of Intex and SBFCFCD property. Thus, the alignment would be positioned approximately 20 feet south of the FCD ROW Alternative, and would not be located within or utilize the SBFCFCD ROW. SCE would not need to obtain easement rights from the SBFCFCD. Based on its discussions with Intex and SBFCFCD, SCE states that both support the Intex Alternative.

This analysis relies on the following sources of information about the Intex Alternative:

- SCE, 2012. E-mail communication from Thomas Diaz, "Falcon Ridge - New Intex Alternative." December 21.
- SCE, 2013a. E-mail communication from Thomas Diaz, "Re: FW: A.10-12-017_Falcon Ridge PTC SCE's Response to Data Request set A10-12-017 Falcon Ridge-ED-013 Q.01 & Q.02." February 28.
- SCE, 2013b. Email communication from Thomas Diaz, "Falcon Ridge – Intex." April 24.

The Intex Alternative would be shorter than the Applicant-proposed route. The total length of the Intex Alternative would be 2,590 feet, compared to 2,900 feet for the corresponding portion of the proposed route.

Under the Intex Alternative, the 66 kV Etiwanda Subtransmission Source Line would not exit the existing 500 kV transmission line ROW at Highland Avenue, as for the Applicant-proposed route, but would continue within the 500 kV ROW for an additional approximately 700 feet, then turn east, exiting the ROW just south of the existing SBFCD ROW. After exiting the transmission line ROW, the Intex Alternative would be constructed within a vacant portion of the Intex property bordering the southern boundary of the SBFCD ROW, adjacent to the chain link fence that separates the Intex and SBFCD properties. The subtransmission source line would be placed underground for approximately 384 feet to maintain clearance with the existing 500 kV transmission line. It then would rise to an overhead position and continue east parallel to the SBFCD ROW for approximately 1,500 feet to San Sevaine Road. The Intex Alternative would rejoin the Applicant-proposed route at San Sevaine Road to cross I-210 to the north.

The Intex Alternative would require two fewer subtransmission line poles than the Applicant-proposed route. The Alternative Route would require two more TSPs and four fewer light weight steel (LWS) poles than the Applicant-proposed route, for a total of 13 new poles compared to the Project's initial proposal to install approximately 15 new poles in this area. Specifications for TSPs and LWS poles are shown in Figure 2-5 of the Draft EIR. Although the specific locations of new subtransmission poles cannot be determined until final engineering occurs, the total number and types of poles can be estimated based on the length and alignment of the route. The Intex Alternative would require one TSP where the subtransmission line turns east and transitions underground beneath the 500 kV transmission line, at the point where it exits the existing 500 kV transmission line ROW and enters Intex property. A second TSP would be located approximately 384 feet east as the line transitions from underground to overhead. A third TSP would be required just south of I-210 in order to span the freeway to the north. The remaining three would be placed as determined needed and appropriate during final engineering. Approximately seven LWS poles would be required for this route: three along the segment extending northeast from South Highland Avenue, and four on the overhead portion extending along the northern boundary of the Intex property to San Sevaine Road.

The Intex Alternative would require less disturbance (temporary and permanent) than the proposed route. As described in Draft EIR Section 2.6.3 (p. 2-12), the estimated land disturbance for construction of new poles is up to 200 feet by 100 feet per TSP and up to 150 feet by 75 feet per LWS pole. However, disturbance would be limited to within the 30-foot-wide ROW; therefore, it is assumed that the smaller dimension for each of these disturbance areas would be 30 feet for the Intex Alternative. This would result in 6,000 square feet of disturbance per TSP and 4,500 square feet per LWS. Areas temporarily disturbed during construction would be restored to within 25 feet of a TSP foundation or 10 feet of a LWS pole, resulting in approximately 1,740 square feet or 0.04 acre of permanent disturbance per TSP¹ and 416 square feet or 0.01 acre of permanent disturbance per LWS pole. Based on these estimates, installation of new poles would result in approximately 13,352 square feet, or 0.3 acres, of permanent ground disturbance. Additionally, approximately 384 feet of this alternative route would be placed in a new underground duct bank. The trench for the duct bank would be approximately 20 inches wide, and a 15-foot laydown and clearance width also would be required, resulting in 5,760 square feet of disturbance. Because this area would be restored after installation, no permanent disturbance would result. Table 1 summarizes this estimated land disturbance.

¹ Because the area of disturbance for a TSP would be limited to the width of the ROW, this is estimated by assuming that permanent disturbance would be within a rectangle of 30 feet in width (the ROW width) by 58 feet in length (8-foot diameter TSP concrete foundation and 25 feet of disturbance in either direction).

TABLE 1
ESTIMATED LAND DISTURBANCE OF INTEX ALTERNATIVE AND APPLICANT-PROPOSED ROUTE

Intex Alternative Feature	Quantity	Disturbed Area Calculation (L x W)	Area Disturbed During Construction (square feet)	Disturbance Accounted for under New Access Road	Adjusted Temporary Disturbance	Area to be Restored (square feet)	Area Permanently Disturbed (square feet)
Install New 66 kV TSP ¹	6	200' x 100'	120,000	(21,600)	98,400	87,960	10,440
Install New 66 kV LWS Pole ¹	7	150' x 75'	78,750	(18,900)	59,850	56,938	2,912
Install New 66 kV Duct Bank	384	linear feet x 15' wide	5,760	N/A	N/A	5,760	0
New Access Road	2,590	linear feet x 18' wide	46,620	N/A	N/A	0	46,620
Total			251,130 (5.8 acres)	(40,500) (0.9 acre)	210,630 4.8 acres	150,658 (3.45 acres)	59,972 (1.4 acres)
Applicant-Proposed Route Total			5.7 acres		5.7 acres	4.3 acres	1.4 acres

¹ Includes foundation installation, structure assembly and erection, conductor & OHGW installation. Area to be restored after construction: Portion of ROW within 25 feet of a TSP or 10 feet of a LWS or wood pole to remain cleared of vegetation and would be permanently disturbed (approximately 0.04 acres per TSP and 0.01 acres per LWS).

SOURCES: SCE, 2013a; SCE, 2013b

The total land disturbance would be approximately half that of the corresponding portion of the Project due to its shorter overall length as well as the narrower width of the ROW. However, its total permanent disturbance would be approximately the same because it would require more TSPs and a slightly longer access road, which are the features resulting in the greatest amount of permanent disturbance.

The Alternative Route would require more road construction and maintenance than the Applicant-proposed route. As shown in Table 1, the Intex Alternative would require the construction and maintenance of approximately 2,590 feet of new access roads – the entire length of the alignment. This is slightly longer than the Project's 2,500 feet of new access roads along this portion, because for the Intex Alternative, new access roads would be required within the existing 500 kV ROW as well as through the Intex property before reaching San Sevaine Road. The new access road would be substantially similar to other proposed access roads along the subtransmission corridor. The road would have a minimum drivable width of 14 feet with 2 feet of shoulder on each side. The gradient would be leveled so that any sustained grade does not exceed 14 percent.

The Intex Alternative would require new easement rights to be obtained. New easement rights would be required to construct the Intex Alternative that would not be required for the Applicant-proposed route. The property owner of that portion of the route (Intex) has offered to grant SCE a 30-foot easement to facilitate the construction and operation of an alternative 66 kV subtransmission line alignment. Intex's proposed easement would parallel the SBFCROW from the existing SCE transmission ROW until the terminus of the SBFCROW, where it curves slightly to the north and proceeds along the property boundary to San Sevaine Road. The Intex Alternative would not require the Applicant to obtain easement rights from SBFCROW.

The Intex Alternative would result in somewhat reduced environmental impacts relative to the Project. Based on discussions with SBFCROW and Caltrans, and Intex's offer to grant SCE an easement for purposes of developing an alternative to the Applicant-proposed route, development of the Intex Alternative also could be feasible.

Accordingly, the CPUC has evaluated the potential direct, indirect, and cumulative effects of the Intex Alternative on a resource-by-resource basis and has documented its conclusions below. For the same reasons summarized in Final EIR Section 2.5.2(D) for the FCD ROW Alternative, CEQA does not require circulation of the Intex Alternative for separate agency and public review.

Analysis of Potential Impacts Created by the FCD ROW Alternative

Aesthetics

As described above, the Intex Alternative alignment would be the same as the Project described in Draft EIR Chapter 2, with the exception of the portion of the Etiwanda Subtransmission Source Line Route in the vicinity of South Highland Avenue and San Sevaine Road. Therefore, impacts from the construction, operation, and maintenance of the Intex Alternative would be the same as the Project; adverse visual impacts to scenic vistas would be less than significant or less than significant with mitigation for Baseline, Beech, Cherry, Citrus, Etiwanda, Sierra, and Wilson avenues; Foothill Boulevard; and I-15. The Intex Alternative would not be located in the vicinity of any state-designated or eligible scenic highways in the study area (no impact), would not substantially degrade the existing visual character or quality of the site and its surroundings (less than significant), nor would this Alternative introduce new sources of substantial light or glare that would adversely affect day or nighttime views in the area (less than significant).

Compared to the Project, the Intex Alternative would result in reduced impacts to viewers on South Highland Avenue, a roadway with moderate to high visual sensitivity that provides views of scenic vistas to the north. While the Project would result in significant and unavoidable impacts to viewers on South Highland Avenue, this Alternative would not be located along South Highland Avenue: instead, it would cross South Highland Avenue to extend northeast within the existing 500 kV ROW until just south of the SBFCD ROW. As described above, from there, the Intex Alternative would continue eastward to the intersection of San Sevaine Road, where it would reconnect with the Applicant-proposed route before crossing I-210. In so doing, the Intex Alternative would be located on property near the existing flood control channel and freeway rather than along South Highland Avenue in an area that is proposed for business park use. To viewers on South Highland Avenue, the Intex Alternative would appear to the north, against a backdrop of open space and I-210 in the foreground, and distant mountains in the background. Motorists would pass under the subtransmission line as it crossed the roadway in existing SCE ROW. The addition of new subtransmission poles and conductor would cause a perceptible increase in structure prominence and industrial character within the landscape. However, motorists already traverse SCE ROW east of the Cherry Avenue, and for the portion of the alternative that parallels South Highland Avenue, the increased distance between the viewer and the subtransmission line would be enough that these components would not demand attention, and would be co-dominant with other features in the viewshed including existing utility infrastructure and mountains in the background. Visual contrast would be low to moderate. The new features would not block views of the San Bernardino and San Gabriel Mountains in the background to the north, and the overall visual change would be low to moderate. Per Draft EIR Table 4.1-2, given South Highland Avenue's moderate to high visual sensitivity, the resulting visual impact would be adverse but not significant.

Compared to the Project, the Intex Alternative would result in minor increased impacts to viewers on I-210, a roadway with high visual sensitivity that provides views of scenic vistas to the north; the portion of the Alternative in the Intex property would be located closer to I-210 than the commensurate portion of the Project, by approximately 0.1 mile. However, the Alternative alignment would be located to the south of I-210, and therefore would not impact scenic views of the San Bernardino and San Gabriel Mountains to the north. This

alternative would traverse I-210 at the same location as the Project. For viewers looking north towards the mountains (i.e., the scenic views), the visual change would be experienced only very briefly, while approaching and crossing under the subtransmission source line. Like the Project, under this Alternative, actual impacts at this KOP would be adverse but less than significant.

Agriculture and Forestry Resources

The Intex Route would be located on land that is designated as Unique Farmland, and would result in some permanent conversion of Unique Farmland to nonagricultural use. However, the Intex Alternative would cause less of an impact on Unique Farmland than the Applicant-proposed route because only 4,453 feet of source line would be located on land bearing this designation as compared to 4,785 feet of source line for the proposed Project. Similar to the Project and the FCD ROW Alternative, this farmland conversion previously was analyzed in the City of Fontana General Plan Update EIR, which concluded that the conversion was a significant and unavoidable impact, and so required the adoption of a Statement of Overriding Considerations for the loss of agricultural land. The Intex Alternative alignment is not zoned for agricultural use, nor is it subject to a Williamson Act contract. It is not located on land zoned as forest land or timberland. Therefore, construction, operation, and maintenance of the Intex Alternative would result in the same impact conclusions as the Project (see Draft EIR Section 4.2, Agriculture and Forestry Resources) for significance criteria a) through e), but would have a decreased impact related to the conversion of Unique Farmland to non-agricultural use.

Air Quality

Construction of the Intex Alternative would not require additional construction equipment beyond that already included in the air quality analysis (see Draft EIR Appendix C); consequently, there would be no new or different criteria air pollutants or toxic air contaminants emitted during the construction of the Intex Alternative than already were analyzed in the Draft EIR. Although construction of the Intex Alternative would result in more trenching for underground duct bank and a slightly longer access road, it would result in a somewhat shorter subtransmission source line with fewer new poles and would require slightly more total ground disturbance compared to the Applicant-proposed route. Therefore, the Intex Alternative would result in slightly lower annual emissions compared to the Applicant-proposed route. However, on a daily basis the construction emissions associated with the Intex Alternative would be expected to be similar to those identified in Draft EIR Table 4.3-6 for the Project. Therefore, although the impact conclusions relating to regional air quality associated with NO_x and PM₁₀ would remain the same as the Project (i.e., temporarily significant and unavoidable), implementation of the Intex Alternative would cause a slightly reduced impact relative to the Project.

Implementation of the Intex Alternative would increase the distance from the route to the closest sensitive receptors (i.e., the condominium complex at the corner of South Highland Avenue and San Sevaire Road) by approximately 500 feet compared to the Applicant-proposed route. This would result in additional dilution of construction equipment diesel exhaust emissions at the condominium complex. Therefore, the air quality and odor-related impacts on sensitive receptors under the Intex Alternative would be slightly reduced compared to the Project, although the impact conclusions would be the same (i.e., less than significant).

Finally, operations associated with the Intex Alternative would not result in the release of any air emissions, and any vehicle trips required for periodic maintenance would be indistinguishable from the infrequent trips that would be required for maintenance of the Applicant-proposed route. Therefore, operations and maintenance-

related impacts associated with the Intex Alternative would be the same as the Project's impacts in these respects (i.e., less than significant).

Biological Resources

The Intex Alternative would traverse disturbed habitat that is similar to the comparable portions of the Applicant-proposed route. The Intex Alternative is within the ruderal (disturbed) fringe surrounding vineyard lands, and appears to support several small, remnant stands of undisturbed grassland habitat, though no evidence of Riversidean sage scrub, a CDFW-sensitive vegetation community, is noted in the alignment. Habitat types in the alignment appear to include ruderal habitat, disturbed annual grassland, vineyard, and disturbed habitat. It is noteworthy that the defunct vineyard located adjacent to the Intex Alternative is gradually being recolonized by non-native grasses and native herbaceous species.

CEQA Guidelines biological resource-related significance criterion a) relates to potential impacts to species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Portions of the Intex Alternative could potentially support special-status plants or wildlife species; however, given the level of disturbance, the overall likelihood is considered low. Focused, USFWS protocol-level biological surveys were performed for the Applicant-proposed route and comparable survey data is not available for the Intex Alternative; therefore, this estimate of potential biological resources that may be encountered on the Intex Alternative would require separate surveys to confirm impact conclusions. The route is within the occupied range of the coast horned lizard, coast patch-nosed snake, burrowing owl, northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, San Diego desert woodrat, southern grasshopper mouse, American badger, and Los Angeles pocket mouse. Thus, these species would be presumed present similar to the comparable portion of the Applicant-proposed route. Therefore, Mitigation Measure 4.4-2 identified for the Applicant-proposed route also would be required for the Intex Alternative. In the absence of focused surveys of the Intex Alternative to demonstrate absence of burrowing owl (a California species of special concern) and San Bernardino kangaroo rat (federally listed endangered), it is possible that these species could occur within the alignment. The Applicant-proposed route is not within designated critical habitat for San Bernardino kangaroo rat, which occurs north of I-210. Plummer's mariposa lily and Parry's spineflower were identified in portions of the Intex Alternative (though not near the modified alignment) and in the absence of focused surveys, there is a low likelihood that these or other special-status plant species may occur in the Intex Alternative.

Because protocol-level surveys demonstrated the absence of San Bernardino kangaroo rat in the Applicant-proposed route, additional kangaroo rat surveys were not required to mitigate project impacts. Additional surveys would be required for the Intex Alternative to identify the potential presence or absence of San Bernardino kangaroo rat and special-status plants in the alignment (see Mitigation Measure Intex Alternative-BIO-1 and BIO-2, respectively, below). If the San Bernardino kangaroo rat were identified during surveys, additional protective measures would be required, such as avoiding occupied habitat by siting towers to avoid occupied habitat or using an alternate route such as the Applicant-proposed route. Due to the high degree of existing ground disturbance of habitat within the Intex Alternative and surrounding intensive land uses (I-210 to the north and vineyards to the south), the likelihood of encountering San Bernardino kangaroo rat and/or special-status plants in the alignment is considered low.

Similar to the Applicant-proposed route, the Intex Alternative would have comparable potential impacts to common or protected nesting migratory birds, and similar hazards to raptors as a result of electrocution or

collision. Therefore, APMs identified for the Applicant-proposed route, and Mitigation Measure 4.4-4 identified for the Applicant-proposed route would also be required for the Intex Alternative.

Mitigation Measure Intex Alternative-BIO-1: A habitat assessment for San Bernardino kangaroo rat shall be conducted by a qualified biologist within the Intex Alternative if this route is approved. If no potential occupied habitat is found during this assessment, then no further action would be necessary. If potential or occupied habitat is identified, USFWS protocol-level trapping surveys shall be performed. Based on survey findings, two potential outcomes are possible:

- If San Bernardino kangaroo rats are not identified during trapping, no impact would occur and no further action would be required.
- If San Bernardino kangaroo rats are detected during surveys, an alternate alignment could be selected or the route altered to completely avoid all potential or occupied habitat for this species. If complete avoidance is not feasible, minimization measures shall be implemented to reduce potential project impacts within occupied habitat to the maximum extent feasible. Such measures could include minimizing that portion of the project footprint that could encroach on an occupied habitat area, surveying and establishing exclusionary perimeter fencing around such areas, and staging materials and work so as not to encroach into them. The presence of a Biological Monitor during Project construction shall be required to further ensure that any potential impacts to special-status wildlife species are avoided and minimized. For those impacts that cannot feasibly be avoided or further minimized, SCE shall purchase mitigation credits from the Cajon Creek Conservation Bank, which is a CDFW-approved conservation and mitigation bank with the capacity to accommodate the project's mitigation requirements.

Significance after Mitigation: Less than Significant.

Mitigation Measure Intex Alternative-BIO-2: If the Intex Alternative is selected, portions of the proposed alignment that have not been surveyed to determine the potential presence or absence of special-status plants shall be surveyed following the most recent CDFG rare plant survey protocol (CDFG, 2009). Following surveys, two potential outcomes are possible:

- If special-status plants are not identified during focused surveys, impacts would not be anticipated and no further action would be required.
- If special-status plants are identified during surveys, the implementation of Mitigation Measure 4.4-1 would reduce potential impacts to a less-than-significant level.

Significance after Mitigation: Less than Significant.

CEQA Guidelines biological resource-related significance criteria b) and c) relate to potential impacts to riparian habitat, sensitive natural communities, or federally protected wetlands. The Intex Alternative would not impact wetlands, riparian habitat or other sensitive natural community, as they do not occur in the alignment.

CEQA Guidelines biological resource-related significance criterion d) relates to movement of any native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, or use of native wildlife nursery sites. The Intex Alternative would not interfere with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No such sites occur in the local vicinity of the Intex Alternative, which abuts a freeway and degraded agricultural lands.

CEQA Guidelines biological resource-related significance criterion e) relates to whether a proposed project or alternative would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The Intex Alternative would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Following the implementation of protective measures, the construction, operation, and maintenance of the Intex Alternative is expected to result in the same impact conclusions as the Project (see Draft EIR Section 4.4, *Biological Resources*) for significance criteria a) through e). The Intex Alternative traverses disturbed habitat similar to that which occurs on the proposed route and the likelihood of encountering sensitive resources in this alignment, which has not been fully studied for biological resources, is estimated to be low.

Cultural Resources

The Intex Alternative would result in the construction of approximately 300 fewer feet of subtransmission line and approximately 90 more feet of new access road, but overall it would not substantially change the size, location or type of facilities to be constructed. Therefore, the facts, analysis and significance conclusions presented for the Applicant-proposed route generally hold true for the Intex Alternative, with one exception. Focused cultural resources surveys were performed for the Applicant-proposed route, but comparable survey data is not available for all of the Intex Alternative. Because the Intex Alternative, where it diverges from the Applicant-proposed route, has not been subject to cultural resources survey, the presence or absence of cultural resources within this portion of the Intex Alternative is unknown, and therefore it is possible that there are previously undocumented cultural resources within these unsurveyed areas. However, because Mitigation Measure Alternative 1-CUL-1 would require additional archaeological survey of unsurveyed areas, the potential cultural resource-related impact of the Intex Alternative would be the same as the Project (i.e., less than significant impact with mitigation incorporated).

With respect to paleontological resources, the Intex Alternative would result in similar impacts to paleontological resources as the Project because the two alignments are underlain by the same geologic units.

Potential impacts to cultural resources under this alternative would be similar to the Applicant-proposed route. Mitigation Measures 4.5-1, 4.5-2, 4.5-3, and Alternative 1-CUL-1 also would be required for the Intex Alternative. The significance conclusions in Draft EIR Section 4.5, *Cultural Resources*, with regard to significance criteria a) through d) would be the same for the Intex Alternative as for the Project.

Energy Conservation

Construction of the Intex Alternative would result in incrementally less energy consumption for construction equipment and construction-related transportation compared to the Applicant-proposed route because of the shorter route resulting in less land disturbance and subtransmission line pole installation. However, the approximately 45 feet more of trenching for the underground portion would result in an incremental increase in energy consumption. As with the Project, the Intex Alternative would not interrupt existing local SCE service and construction-related energy demands are not expected to have a significant adverse effect on energy resources. Like the Project, the Intex Alternative would contribute to meeting projected local peak demand electricity needs and would have no impact on local or regional energy supplies or capacity, nor would it impact electricity generation facilities' ability to provide and maintain existing levels of service during peak and base period

demands. Therefore, the impact conclusions related to the construction, operation, and maintenance of the Intex Alternative would be the same as for the Project in Draft EIR Section 4.6, *Energy Conservation*, with regard to criteria a) through f).

Geology, Soils, and Seismicity

The Intex Alternative would not substantially change the size or type of facilities to be constructed. The Intex Alternative would be slightly shorter, require slightly more access road construction and maintenance, and result in less overall land disturbance than the Project. Because the Intex Alternative, like the Applicant-proposed route, would cross mostly flat terrain underlain by similar earth materials, it would result in similar potential impacts with respect to seismic ground shaking and/or seismic-related ground failure, soil erosion, unstable geologic units or soils, and expansive soils. While SCE has not yet prepared a geotechnical investigation of the subtransmission source line route, associated facilities, or telecommunications system, one would be prepared if necessary as part of pre-construction activities. Likewise, review of all geotechnical reports and their incorporation into Project plans would occur prior to issuance of a grading or building permit by the agency with jurisdiction over the construction activity. Design recommendations from existing geotechnical reports also would be relevant and applied to the design of the Intex Alternative. For example, for underground sections of the subtransmission source line (e.g., the 384-foot section of the Intex Alternative that would be underground), the trench would be backfilled with a slurry mix that is non-expansive. Therefore, the significance conclusions with respect to each of the criteria in Draft EIR Section 4.7, *Geology, Soils, and Seismicity*, would be the same for the Intex Alternative as they are for the Project.

Greenhouse Gas Emissions

Implementation of the Intex Alternative would result in slightly lower construction emissions compared to the Applicant-proposed route primarily because construction of the Intex Alternative would require a total construction disturbance area that would be less than half of that required for the Applicant-proposed route even though the alternative would require a slightly longer access road. In addition, GHG emissions generated during operation and maintenance of the Intex Alternative would be the same as those described for the Project. Therefore, the Intex Alternative would cause incrementally (but inconsequentially) fewer GHG emissions than the Project and the significance conclusions reached in Draft EIR Section 4.8, *Greenhouse Gas Emissions*, for the Project would be the same for the Intex Alternative.

Hazards and Hazardous Materials

The Intex Alternative is within the regulatory agency database search area reviewed for identification of hazardous materials sites in the vicinity of the Project. No hazardous materials sites are identified in this area; therefore, the impact determinations related to location on a hazardous materials site and the potential to encounter hazardous materials in soil or groundwater during Project construction would be the same for the Intex Alternative as they would be for the Project. Further, the location of the Intex Alternative would not change the impact determinations related to hazards in proximity to schools or airports, wildland fires, and potential to interfere with an adopted emergency response or evacuation plan. Although the total length of the Intex Alternative would be shorter, the Intex Alternative would not substantially lessen the kinds and amounts of hazardous materials associated with Project construction or operation and impact conclusions for the Intex Alternative would be the same as the Project pertaining to the routine transport, use or disposal of hazardous materials or hazards to the public or the environment through reasonably foreseeable upset and accident

conditions. In summary, the Intex Alternative would not change the impact conclusions in Section 4.9, *Hazards and Hazardous Materials*, related to significance criteria a) through h).

Hydrology and Water Quality

The Intex Alternative would not substantially change the size or type of facilities to be constructed. The Intex Alternative would be slightly shorter and result in less overall land disturbance. Because the Intex Alternative, like the Applicant-proposed route, would cross mostly flat terrain, and differ from the Applicant-proposed route only over a relatively short section, it would result in similar potential impacts with respect to existing water quality standards and the potential for increasing erosion and/or flooding. Similar to the Applicant-proposed route, the construction, operation, and maintenance of the Intex Alternative would generally pose a low threat to water quality due to the level terrain, high rate of soil infiltration, and the regulatory controls that would apply. The mitigation measures that would be required to avoid or reduce the significance of Project impacts also would be required for Intex Alternative (e.g., preparation and implementation of a SWPPP, a WQMP, and, if required, coverage under a water quality certification, and/or WDR). These mitigation measures would be sufficient to reduce potential water quality impacts to a less-than-significant level. Therefore, there would be no change to the conclusions in Draft EIR Section 4.10, *Hydrology and Water Quality*, with regard to hydrology and water quality.

Land Use and Planning

The Intex Alternative would be located within the Project Area analyzed in the Draft EIR; it would not change the land uses proposed by the Project; physically divide a community; be located within a land use or zoning designation not analyzed in Draft EIR Section 4.11; or conflict with any with applicable land use plans, policies, or regulations. Although the Intex Alternative would be located on land within the as-yet undeveloped West Gate Specific Plan area, this alternative would relocate the subtransmission line and access road from South Highland Avenue to the back of the property paralleling the fence between the Intex Property and the SBFCD ROW, thereby reducing any potential access restrictions that could occur once this area is developed. The Intex Alternative also would require an adjustment in the location of the proposed Intex easement. The Intex Alternative would result in the same impact conclusions as the Project with respect to the significance criteria considered in Draft EIR Section 4.11, *Land Use and Planning*.

Mineral Resources

The Intex Alternative would not substantially change the size or type of facilities to be constructed. While portions of the Project area do intersect some aggregate resource sectors, the Intex Alternative alignment would not be within an area currently available for extraction of mineral resources. It would be within and bounded to the south by the as-yet undeveloped West Gate Specific Plan area, and bounded by a flood control channel to the north. Therefore, the impact significance conclusions would be the same for the Intex Alternative as they are for the Project in Draft EIR Section 4.12, *Mineral Resources*.

Noise

Implementation of the Intex Alternative would increase the distance from the route to the closest sensitive receptors (i.e., the condominium complex at the corner of South Highland Avenue and San Sevaine Road) by approximately 500 feet compared to the Applicant-proposed route. This would result in additional attenuation of construction equipment and corona discharge noise levels at the condominium complex. Therefore, although the significance conclusion regarding noise and vibration impacts on those sensitive receptors would be the same as for the Project (i.e., less than significant) the Intex Alternative would cause incrementally less noise than the

Project. Mitigation Measure 4.13-5 would apply to the Intex Alternative just as it would to the Project in the event that nighttime construction activities would occur near San Sevaine Road south of I-210 because that area would continue to be within 1,000 feet of the condominium complex.

The segment of the Etiwanda Subtransmission Source Line Route that would be within the City of Rancho Cucamonga is shared by the Intex Alternative and the Applicant-proposed route; therefore, the Draft EIR significant and unavoidable Impact 4.13-1 conclusion associated with construction activities violating City of Rancho Cucamonga exterior noise standards would be the same. Similarly, the Alder Subtransmission Source Line Route would be implemented under both the Intex Alternative and the Applicant-proposed route; therefore, Impact 4.13-6 associated with Rialto Municipal Airport noise would be the same.

In summary, the construction, operation, and maintenance of the Intex Alternative would have an incrementally smaller impact than the Project; however, since the reductions would be so slight, the impact conclusions would be the same for the Intex Alternative as those reached for the Project in Draft EIR Section 4.13, *Noise*.

Population and Housing

Although total amount of construction associated with the Intex Alternative would be less than the Applicant-proposed route due to the shorter length, the overall number of workers required for construction of the entire Project is not expected to change. The Intex Alternative would not propose new homes or businesses nor displace any housing or people. Operation of the Intex Alternative would not indirectly induce substantial population growth or encourage new development as the Project is designed to meet forecasted demand projections for electrical service. Therefore, construction, operation, and maintenance of the Intex Alternative would have the same population and housing-related effects as the Project (see Draft EIR Section 4.14, *Population and Housing*).

Public Services

Construction of the Intex Alternative would not change the number of workers required for Project construction discussed in the Draft EIR, nor would it cause an increased demand or need for fire protection, police protection, school facilities, parks, or other public facilities. Therefore, it would not result in the construction of new or expanded existing government facilities for public services. Consequently, the impacts of the Intex Alternative would be the same as the conclusions reached for the Project in Draft EIR Section 4.15, *Public Services*.

Recreation

The Intex Alternative does not propose any recreational facilities, nor would it change the number of workers required for Project construction described in the Draft EIR. Therefore, it would not cause physical deterioration of existing facilities, or indirectly require construction or expansion of recreational facilities. Implementation of the Intex Alternative would cause the same impacts and result in the same impact significance conclusions as were reached for the Project in Draft EIR Section 4.16, *Recreation*.

Transportation and Traffic

The Intex Alternative would alter and shorten the Applicant-proposed route by approximately 310 feet and would require the construction and maintenance of approximately 90 feet more of new access road than the Applicant-proposed route. The Intex Alternative would not substantially change the size or type of facilities to be constructed and would not require a workforce or equipment above and beyond what is described in the Draft EIR Chapter 2, *Project Description*, and analyzed in Section 4.17, *Transportation and Traffic*. Because the Intex

Alternative would generate either similar or slightly lower levels of construction traffic along similar roadways as the Applicant-proposed route, potential impacts to transportation and traffic under this alternative would be substantially similar to the Applicant-proposed route. Therefore, Mitigation Measures 4.17-1 and 4.17-2 identified for the Applicant-proposed route also would be required for this alternative. In addition, traffic related to operation and maintenance of the Intex Alternative would be the same as for the Applicant-proposed route because the same number of staff and maintenance activities would be required, so impacts would be the same. Therefore, the impact significance conclusions for the Intex Alternative would be the same as those reached for the Project in Draft EIR Section 4.17, *Transportation and Traffic*.

Utilities and Service Systems

The Intex Alternative would result in substantially similar water consumption and wastewater and solid waste generation although its subtransmission source line route would be slightly shorter. The slight decrease in length would not substantially change wastewater treatment needs, wastewater treatment facility capacity, water supply needs, or solid waste disposal needs relative to the Project. Consequently, the impact significance conclusions would be the same as those reached for the Project in Draft EIR Section 4.18, *Utilities and Service Systems*.

Comparison of the Intex Alternative to the FCD ROW Alternative

Although the FCD ROW Alternative has been determined to be infeasible for the technical reasons described above, because the FCD ROW Alternative was identified in the Draft EIR as the environmentally superior alternative, a comparison of it and the newly-proposed Intex Alternative is provided for informational purposes. SCE estimates that the overhead subtransmission source line under the Intex Alternative would be approximately 31 feet longer than the FCD ROW Alternative, the underground ROW would be approximately the same length, and the access road would be approximately 1,411 feet longer. The Intex Alternative also would require three more TSPs and three fewer LWS poles than the FCD ROW Alternative. (SCE, 2013a)

As described in this memorandum for the Intex Alternative and in Final EIR Section 2.5.2 for the FCD Alternative, the significance conclusions of the two alternatives would be the same even if some of the intensity of individual effects would vary slightly. The Intex Alternative would result in the disturbance and permanent conversion of more Unique Farmland than the FCD ROW Alternative because it would be constructed nearly all within an easement on land designated as Unique Farmland, rather than within the FCD ROW, which is not designated as Unique Farmland. However, as described above under Agriculture and Forestry Resources, the impact of this conversion already has been analyzed by the City of Fontana General Plan EIR. The Intex Alternative would result in incrementally greater air pollutant and GHG emissions during construction due to its longer overall length and longer access road. However, daily emissions would likely be similar. Similarly, the Intex Alternative would use incrementally more energy during construction.

The Intex Alternative is Environmentally Superior to the Project

As summarized in Draft EIR Section ES.7 (p. ES-9) and analyzed throughout Draft EIR Chapter 4 (p. 4-1 et seq.), the proposed Project would cause no adverse impact related to Agriculture and Forest Resources and Public Services and a less-than-significant impact to the following resources: Energy Conservation, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, and Utilities and Service Systems. With the implementation of identified mitigation measures, the Project also would cause a less-than-significant impact to: Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Recreation, and Transportation and Traffic. By contrast, it was

determined that development of the Project would cause significant and unavoidable impacts to three resource areas: Aesthetics, Air Quality, and Noise.

As described above, analysis of the environmental effects of the Intex Alternative generally would result in the same impact conclusions as the Project with one exception: The Project's significant and unavoidable Aesthetics impact relative to South Highland Avenue would be reduced by the Intex Alternative to a less than significant level. The Intex Alternative would result in a less than significant (rather than significant unavoidable) impact to viewers on South Highland Avenue, which provides views of scenic vistas to the north, because it would remove the subtransmission line route from South Highland Avenue and, instead, would locate it slightly further north, and thereby would increase the distance between viewers and the subtransmission line. The Intex Alternative would not block views of the San Bernardino and San Gabriel Mountains in the background to the north. In addition, the Intex Alternative would cause incrementally reduced impacts to noise and air quality relative to the Project because the Intex Alternative would be located farther away from sensitive receptors than the Project. For these reasons, the Intex Alternative is environmentally superior to the Project.