

March 5, 2012

VIA U.S. MAIL

Mr. Michael Rosauer
Lakeview Substation Project
c/o Environmental Science Associates
225 Bush St., Suite 1700
San Francisco, CA 94104
Email: lakeviewsubstation@esassoc.com

Re: *SCE's Comments on the Draft Environmental Impact Report (SCH #2010121032) for the Lakeview Substation Project (A.10-09-016)*

Dear Mr. Rosauer:

Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Report (DEIR) circulated by the California Public Utilities Commission (CPUC) on January 12, 2012. On behalf of Southern California Edison (SCE), the proponent of the Lakeview Substation project (Proposed Project) that is the subject of the DEIR, this comment letter and the enclosed table address issues that apply to the entire DEIR. While SCE fully supports the CPUC's determination that the Proposed Project is the Environmentally Superior Alternative, the enclosed table details a number of revisions that should be incorporated into the Final EIR. In addition, this comment letter describes some minor changes to the Proposed Project that should similarly be incorporated in the Final EIR. The changes described in both documents should not change the CPUC's determination that the Proposed Project is the Environmentally Superior Alternative since the changes do not lead to any additional impacts that were not discussed in the DEIR.

1. The Need Date For the Proposed Project Has Shifted To 2014.

As identified in SCE's Proponent's Environmental Assessment (PEA), SCE projected that the capacity at Nuevo Substation would be exceeded in 2009. Because the Proposed Project could not be licensed and permitted by 2009, a temporary substation was constructed (Model Pole Top) to provide an interim means to serve the electrical demand in the area until the Proposed Project could be constructed. Although construction of Model Pole Top temporarily added 10 MVA of transformer capacity, it does not significantly improve reliability and system operational flexibility on either a near-term or a long-term basis. Based on these considerations, and the fact that the Nuevo Substation has insufficient capacity to reliably serve the existing and forecasted demand within the Environmental Needs Area (ENA) on a long-term basis, SCE estimated that the Proposed Project would be needed by mid-2013.

Based on SCE's most current load projections (which are updated each year), SCE has determined that the capacity of Nuevo Substation would be exceeded in 2014, rather than mid-2013. Consequently, the need date for the Proposed Project is now 2014.

2. 12kV Distribution Mitigation Is No Longer Needed.

The change in need for the Proposed Project has provided some short-term relief, such that the temporary 12kV distribution line (as identified in the DEIR) that would need to be constructed between Nuevo and Bunker substations in order to implement Alternative 1 (phased construction) will no longer be required. However, SCE will still need to rely on Model Pole Top as temporary mitigation until the Proposed Project can be constructed. Continued use of Model Pole Top to provide mitigation poses certain risks since Model Pole Top is distribution-level mitigation and is not considered a long-term solution, as would be those facilities that would be installed as part of the Proposed Project. In addition, since Model Pole Top is limited to 10MVA and serves only a limited geographic area, there are fewer options for use in switching for planned or unplanned outages compared to facilities served by substation-class equipment.

This continued reliance on Model Pole Top causes further risks with Alternative 1 because of the delays that will likely occur as a result of phasing construction. As detailed in SCE's Memorandum to the CPUC dated September 2, 2011, in which SCE analyzed whether Alternative 1 should be considered reasonable in accordance with CEQA Guidelines § 15126.6 (a) (SCE 2011 Memorandum, attached hereto as Exhibit "A"), SCE determined that phased construction would not be reasonable due to technical, practical and economic constraints. Among those constraints were that SCE would lose the flexibility it needs to account for the uncertainties associated with the timing of land acquisition, and the procurement of permits if it were to phase construction. Phasing construction would also reduce construction scheduling flexibility and reduce SCE's ability to manage unforeseen changes in field construction, risking further delays in the completion of the project. These constraints were similarly identified in the DEIR for SCE's Falcon Ridge Substation Project and as a result, a phased construction alternative was eliminated from further consideration by the CPUC for that project. Accordingly, SCE supports the CPUC's decision to eliminate Alternative 1 from further consideration in the DEIR for the Proposed Project as well.

3. The Telecommunication Line Route Has Changed In Order To Further Minimize Environmental Impacts.

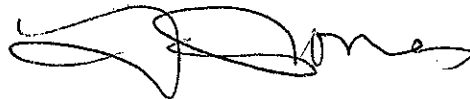
In its PEA, SCE proposed Fiber Optic Cable Route 3 to connect the Moval Substation to the existing Bunker Nelson Fiber Optic cable in order to facilitate the connection of Lakeview Substation to the existing telecommunications network. Fiber Optic Cable Route 3 (as described in the DEIR in full detail) generally consisted of placing a telecommunication line on the existing Valley-Moval 115 kV Subtransmission Line poles, as well as potential road rehabilitation along the existing access road.

However, it has since been determined that SCE's existing Valley-Moval 115 kV Subtransmission Line is located within a Core Reserve, as identified by the Stephen's Kangaroo Rat Habitat Conservation Plan (SKRHCP) administered by the Riverside County Habitat Conservation Authority (RCHCA). In an effort to minimize potential impacts to the Stephen's Kangaroo Rat by constructing within the Core Reserve (although determined to be minimal and less than significant pursuant to CEQA), an alternative to Fiber Optic Cable Route 3 was considered and has been determined to be feasible by SCE. Accordingly, SCE now proposes the underground installation of telecommunications cable at and within the vicinity of Alessandro Substation to replace the work described for Fiber Optic Cable Route 3. The work at and within the vicinity of Alessandro Substation is described in more detail in the comment table prepared by SCE and filed concurrently with this letter, but would generally include installation of telecommunications cable within existing underground conduit and installation of telecommunications cable within new underground conduit. The fiber optic cable work at the existing Alessandro Substation consists of work within the boundaries of the existing substation, within existing John F. Kennedy Drive, and within existing Kitching Street within the City of Moreno Valley.

4. Conclusion

SCE appreciates the CPUC's work in analyzing the Proposed Project, and the opportunity to provide these comments on the DEIR. We look forward to the CPUC's preparation of a Final EIR consistent with the comments provided in this letter and in the enclosed comment table.

Sincerely,



Tammy Jones
Southern California Edison Company

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Enclosures

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
1.	Global Edit		Please update all Operating Date references in the text for the reasons discussed in SCE's accompanying letter.	
2.	Global Edit		For consistency purposes, please clarify Model Pole Top is a temporary substation as described in SCE's PEA: " <u>temporary Model Pole Top Substation</u> ."	Please revise throughout the DEIR where appropriate as follows: " <u>temporary Model Pole Top Substation</u> ."
3.	Global Edit		Please correct all references throughout the text of "Avenue A" to "Avenue."	
4.	Global Edit		Please correct all reference throughout the text of "Reservoir Street" to "Reservoir Avenue."	
5.	TOC	x	SAC in appendix states "Standard Aluminum Conductor". Should say "Stranded" as reflected in section 3.1.2 of the PEA.	Please revise as follows: "SAC Standard <u>Stranded</u> Aluminum Conductor"
6.	Executive Summary	ES-2	Under the heading ES-2 Project Objectives , for consistency purposes please clarify Model Pole Top was constructed as a temporary stop gap measure and is a temporary substation, as described in SCE's PEA. Also, please update the timeframe in which the capacity at Nuevo Substation will be exceeded from 2013 to 2014, per SCE's accompanying cover letter.	Please revise as follows: "The Electrical Needs Area consists of that part of unincorporated western Riverside County (including the developing areas of Nuevo and Lakeview) now served by SCE's 33/12 kV Nuevo Substation and temporary Model Pole Top Substation, which provide electrical service to approximately 1,800 metered customers, and presently are at or near capacity . In 2007, SCE projected that the capacity at Nuevo Substation would be exceeded in 2009, and the temporary Model Pole Top Substation was constructed to provide an interim means to serve the electrical demand in the area until a new substation could be constructed to provide for the long-term capacity, reliability, and system operational flexibility needs of the Electrical Needs Area. The energy demand of the growing communities in this area is expected to exceed the combined-energy capacity of the <u>Nuevo existing</u> sSubstations in the 2013-2014 timeframe. If approved, the Project would serve forecasted electrical demand in the Electrical Needs Area beyond 2032. The Electrical Needs Area is shown in Figure ES-1 ."
7.	Executive Summary	ES-2	Under the heading Project Components , the reference to Reservoir Street should be Reservoir Avenue.	Please revise as follows: "...on private property, or in franchise on 10 th street and Reservoir <u>Street Avenue</u> ."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
8.	Executive Summary	ES-3	Regarding Figure ES-1 Electrical Needs Area , please remove Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter.	
9.	Executive Summary	ES-4	Under the heading Project Components regarding the first bullet point, please remove the description related to Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter and replace it with the information provided regarding the work to occur in the vicinity of the existing Alessandro Substation.	Please revise as follows: "Two new diverse fiber-optic cable routes would connect the Lakeview Substation to the existing Bunker-Nelson fiber-optic cable and fiber optic cable work at the existing Alessandro Substation and a third new fiber-optic cable route would connect the Meval Substation to the existing Bunker-Nelson fiber-optic cable. The connection points with the Bunker-Nelson fiber-optic cable are each located approximately 1 mile north of from the proposed Lakeview Substation."
10.	Executive Summary	ES-4	Under the heading Project Components , regarding the third bullet point, please remove the description related to Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover.	Please revise as follows: "Access road rehabilitation is proposed in case it becomes necessary to conduct Project work along the existing Valley-Moval Subtransmission Line during installation of Fiber-Optic Cable Line Route 3 I".
11.	Executive Summary	ES-5	Under the heading, Applicant Proposed Measures , regarding APM Bio-2, the last line incorrectly references the section of the PEA where the Worker Environmental Awareness Plan (WEAP) is discussed.	Please revise as follows: "Any significant findings during pre-construction surveys would be added to the [Worker Environmental Awareness Plan (WEAP)] training described in Section 2-7-3 3.9 of Chapter 3 [of the PEA].

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
12.	Executive Summary	ES-5	Under the heading Applicant Proposed Measures regarding APM Bio-3, please revise the APM to accurately reflect the habitat assessment work conducted for the Stephen's kangaroo rat surveys for the Proposed Project.	Please revise as follows: "A habitat assessment for Stephens' kangaroo rat shall be conducted by a biologist qualified to conduct Stephen's kangaroo rat surveys along Segment 1, 2 and 3 and the Proposed Telecommunications Route for the entire Proposed Project. Protocol level trapping was conducted along Subtransmission Segment One and Two. Stephens' kangaroo rat was detected along Segment One. The proposed project is in a Stephens' kangaroo rat fee area; therefore, to mitigate for potential impacts to this species, SCE will pay a fee in coordination with the Regional Habitat Conservation Authority, if no potential occupied habitat is found during this assessment, then no further action is necessary. If potential for occupied habitat is found, protocol trapping surveys shall be conducted. The Proposed Telecommunications Route is within a Stephens' kangaroo rat fee area; therefore, if suitable habitat for this species is found, a fee shall be paid in lieu of further surveys (County of Riverside, 1996)."
13.	Executive Summary	ES-6	Under the heading Applicant Proposed Measures , regarding APM Bio-6, additional information should be included explaining that instead of preparing and implementing a mitigation plan, SCE may participate in the MSHCP if significant impacts to native vegetation and/or Special Status Plants are unavoidable.	Please include the following sentence at the end of APM-Bio-6: "In lieu of preparing the abovementioned plan, SCE may participate in the MSHCP."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
14.	Executive Summary	ES-6	Regarding APM-BIO-7 the text should indicate that if impacts to San Jacinto Valley crownscale are unavoidable, SCE would participate in the WRMSHCP to mitigate impacts to this species.	Please revise as follows: "In order to avoid potential impacts to known populations of San Jacinto Valley crownscale populations, an Environmentally Sensitive Area (ESA) will be developed prior to construction to the extent feasible in the final Project Design (Figure 4.4-5). If significant impacts to San Jacinto Valley crownscale are unavoidable, a biologist will be selected to prepare and implement a mitigation plan, which will include detailed descriptions of maintenance appropriate for the mitigation site, monitoring requirements, and annual report requirements, and will have the full authority to suspend any operation which is, in the biologist's opinion, not consistent with the mitigation plan. This plan will be submitted for review to the appropriate agencies. If impacts to San Jacinto Valley crownscale are unavoidable, SCE would seek inclusion in the Western Riverside County Multi-Species Habitat Conservation Plan to mitigate for unavoidable impacts to this species."
15.	Executive Summary	ES-8	Under the heading ES.5 Environmentally Superior Alternative , as explained in SCE's accompanying cover letter, the 12 kV distribution line from Nuevo Substation to Bunker Substation is no longer needed. Additionally, as explained in SCE's accompanying cover letter, Alternative 1: Phased Construction, would pose practical and economic constraints that do not meet the CEQA guidelines feasibility criteria. Based on the information in SCE's accompanying cover letter it is suggested that the rationale for the Environmentally Superior Alternative be updated and conclude that SCE's proposed project is still preferred to Alternative 1.	
16.	Executive Summary	ES-11	Regarding Table ES-1 Summary of Impacts of 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.	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
17.	Chapter 1	1-3	<p>Regarding Table 1-1 Summary of Potential Permit Requirements, the following permits should be removed as they are not likely required for the Project:</p> <ul style="list-style-type: none"> • Nationwide or Individual Permit (Section 404 of the Clean Water Act) • Lake and Streambed Alteration Agreement (Section 1602) • Section 401 of the Clean Water Act, Water Quality Certification (or waiver) 	<p>Please update the table as requested.</p> <ul style="list-style-type: none"> • Nationwide or Individual Permit (Section 404 of the Clean Water Act) • Lake and Streambed Alteration Agreement (Section 1602) • Section 401 of the Clean Water Act, Water Quality Certification (or waiver)
18.	Chapter 1	1-3	<p>Regarding Table 1-1 Summary of Potential Permit Requirements, the grading permit listed in the table would be secured by SCE if it's ministerial.</p>	<p>Please revise as follows: "Ministerial Grading Permit"</p>
19.	Chapter 2	2-1	<p>Under the heading 2.1 Introduction, please remove the reference to distribution poles as distribution poles will not be removed as a part of this project.</p>	<p>Please revise as follows: "Existing wooden distribution poles would be removed and a combination of new wood poles and tubular steel poles (TSPs) would be constructed."</p>
20.	Chapter 2	2-1	<p>Under the heading 2.1 Introduction, to be consistent with the information provided in SCE's PEA, please add the following paragraph to the end of this section.</p>	<p>Please add in the following paragraph: "<u>The Proposed Project components listed above are described in more detail below. The project description is based on planning level assumptions. Exact details would be determined following completion of final engineering using SCE's design and construction standards and specifications. Identification of field conditions, availability of labor, material, and equipment, and compliance with applicable environmental and permitting requirements.</u>"</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
21.	Chapter 2	2-4	<p>Under the heading 2.6.1 Substation Work, the restroom component is not specifically identified in this section; however, it is implied that a restroom would be constructed and is analyzed in the subsequent resource sections.</p> <p>It is suggested our revision for the restroom be included to be consistent with SCE's PEA.</p>	<p>Please revise as follows: <u>“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.”</u></p>
22.	Chapter 2	2-3	<p>Regarding Figure 2.1, please remove Fiber Optic Cable Route 3 under Project Components for the reasons described in SCE's accompanying cover letter and replace it with the information provided regarding the work to occur in the vicinity of the existing Alessandro Substation.</p>	<p>Please remove blue Route 3 fiber optic cable</p>
23.	Chapter 2	2-4	<p>Under the heading 2.5 Overview of the Project, for the reasons described in SCE's accompanying cover letter, please insert additional information regarding the telecommunications work at Alessandro Substation to the 4th bullet point.</p>	<p>Please revise as follows: <u>“Installation of telecommunications facilities at the Lakeview Substation, including fiber-optic telecommunications cable (overhead and underground) to connect the Lakeview Substation to SCE's telecommunications network, installation of telecommunications cable (underground) to connect the Alessandro Substation to the SCE telecommunications network, and upgrades to the telecommunications equipment at the various substations (described in Section 2.5.3, <i>Telecommunications Description</i>)”</u></p>
24.	Chapter 2	2-4	<p>Under the heading 2.6.1 Substation Work, the description for the proposed construction incorrectly references the sections and should be revised.</p>	<p>Please revise as follows: <u>“This section describes the proposed construction of the Lakeview Substation in Section 2.5.1.1 2.6.1.1 and proposed upgrades to specified existing substations in Section 2.5.1.2 2.6.1.2. Decommissioning of the existing Nuevo Substation and Model Pole Top are described in Section 2.9.”</u></p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
25.	Chapter 2	2-4	Under the heading 2.6.1.1 New Lakeview Substation , the overall substation dimensions and the acreage of the parcel are incorrect and should be revised.	Please revise as follows: "The Lakeview Substation would be a new, approximately <u>330 395</u> foot by <u>345 403</u> foot, 115/12 kV unattended, automated 56 MVA low-profile substation constructed on approximately <u>2.7 3</u> acres of a 5.4-acre parcel located in unincorporated Riverside County. The substation site would be approximately 452 feet long by 525 feet wide. The remaining <u>2.7 2.4</u> acres of the proposed site would allow for future street improvements and widening, street set-backs, safety buffers, and landscaping."
26.	Chapter 2	2-4	Under the heading 115 kV Switchrack , please insert the word "approximately" as final engineering has not yet been completed.	Please revise as follows: "One steel 115 kV switchrack, up to approximately 100 feet long by 240 feet wide by 36 feet high would be installed. The switchrack would consist of eight 30-foot-wide positions"
27.	Chapter 2	2-5	Within the detail of Figure 2-2 , please revise reference to Segment 1's new wood pole count from "25 to 27" to the correct count "26 to 28" as provided in SCE's PEA.	
28.	Chapter 2	2-5	Regarding Figure 2-2 , please remove Fiber Optic Cable Route 3 under Project Components for the reasons described in SCE's accompanying cover letter and replace it with the information provided regarding the work to occur in the vicinity of the existing Alessandro Substation.	Please remove blue Route 3 fiber optic cable and expand the view to show the location of Alessandro Substation.
29.	Chapter 2	2-7	Under the heading 115 kV Switchrack , please insert the word "approximately" as final engineering has not yet been completed.	Please revise as follows: "The operating and transfer buses would each be approximately 240 feet long, and consist of one 1590 thousand circular mils (kcmil) Aluminum Conductor Steel Reinforced (ACSR) for each of the three electrical phases."
30.	Chapter 2	2-7	Under the heading Two 28 MVA, 115/12 kV Transformers , please clarify that the dimension is for the total transformer bank area, which includes more equipment than just the transformers.	Please revise as follows: " The Total transformer bank area would be approximately 80 160 feet long by 52 60 feet wide by 34.5 35 feet high."
31.	Chapter 2	2-9	Under the heading Distribution Getaway , as previously explained, please replace Reservoir Street with Reservoir Avenue	Please revise as follows: "...or in franchise on 10th Street and Reservoir Street Avenue ."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
32.	Chapter 2	2-9	Under the heading Distribution Getaway , please remove the hyphen to clarify there is not a range for the voltage	Please revise as follows: "Within the substation site, distribution circuits would be placed in an underground conduit system. At full build out, the Lakeview Substation could accommodate 16 sixteen 12 kV distribution circuits."
33.	Chapter 2	2-11	Under the heading 2.6.2 Subtransmission Source Lines , the total acreage for new ROW should be updated.	Please revise as follows: "Approximately 20.6 15 acres of new ROW would be required for these subtransmission source lines. The easement would be 30 feet wide."
34.	Chapter 2	2-13	Under the heading 2.6.4 Telecommunications Facilities , please remove the reference to the third new fiber optic cable route for the reasons described in SCE's accompanying cover letter.	Please revise as follows: " and a third new fiber optic cable route would connect the Moyal Substation to the existing Bunker-Nelson fiber optic cable. The connection points with the Bunker-Nelson fiber-optic cable are each located approximately 1 mile north of the proposed substation."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
35.	Chapter 2	2-14	Please remove Fiber Optic Cable Route 3 under the heading 2.6.4 Telecommunication Facilities for the reasons described in SCE's accompanying cover letter and replace it with the information provided regarding the work to occur in the vicinity of the existing Alessandro Substation.	<p>Please revise as follows: <u>"The third fiber optic cable would exit the Meval Substation to the south. From inside the substation, cable would be placed in new underground duct banks for approximately 100 feet to the substation perimeter. The cable would continue underground outside the substation for approximately 2,400 feet south on the east side of Moreno Beach Drive. The cable would rise up on a pole approximately 200 feet south of Alessandro Boulevard on the west side of Moreno Beach Drive. In an overhead position, the cable would continue south to south east on the existing structures of the 115 kV Valley Meval Subtransmission Line for approximately 45,300 feet, until crossing Ramona Expressway, approximately 0.25 miles west of Bernasconi Road where it would connect to the existing Bunker Nelson fiber cable. The entire route would be approximately 47,800 feet.</u></p> <p><u>The fiber optic cable work at the existing Alessandro Substation consists of work within the boundaries of the existing substation, within existing John F. Kennedy Drive, and within existing Kitching Street. From an existing pole on the west side of Kitching Street approximately 450 feet north of John F. Kennedy Drive, SCE would install cable within an existing underground conduit south to an existing vault located at the northwest corner of Kitching Street and John F. Kennedy Drive. From the existing vault located at the northwest corner of Kitching Street and John F. Kennedy Drive, SCE would install one cable within an existing underground conduit, south across John F. Kennedy Drive and west into Alessandro Substation for approximately 750 feet to the MEER building located within the existing Alessandro Substation Property. From the existing vault located at the northwest corner of Kitching Street and John F. Kennedy Drive, SCE would install new underground conduit south across John F. Kennedy Drive for approximately 358 feet to an existing manhole located on the east side of Kitching Street. From the existing manhole located on Kitching Street, SCE would install new underground conduit west across Kitching Street to approximately 200 feet to the east of the perimeter fence of existing Alessandro Substation. In order to install the new conduit, SCE will be required to utilize a directional bore so as to bore under an existing concrete lined storm drain that runs north and south between Kitching Street and Alessandro Substation. Within Alessandro Substation, SCE would install approximately 1,400 feet of new underground conduit to the existing MEER building and three 4' x 4' x 6' manholes."</u></p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
36.	Chapter 2	2-14	Under the heading 2.7.2 Geotechnical Investigations , please clarify initial geotechnical investigation was performed at the Proposed Substation Site and not for the entire project.	Please revise as follows: "SCE conducted an initial geotechnical investigation report for the Project <u>Proposed Substation Site</u> to determine the nature and engineering properties of the subsurface soils and to provide preliminary recommendations for site grading, foundation design, and construction. All site preparation and structural design recommendations provided in the initial geotechnical investigation would be implemented as part of the Project. SCE would contract with a professional geotechnical engineer or engineering geologist to monitor site-preparation and earthwork activities, to ensure structural fills are adequately placed and compacted, and to ensure footings are founded on satisfactory materials."
37.	Chapter 2	2-15	Under the heading 2.7.3 Environmental Surveys , regarding bullet point number two which states the following, " <i>Nesting Bird</i> : If Project construction activities would occur during the nesting season (February 15 – September 15), a qualified biologist would survey construction areas for active nests. If active nests are identified, construction activities would not occur within 200 feet of the active nest." The language should be revised to explain a project specific nesting bird management plan would be developed and include appropriate buffers based on species specific biology and behavior. Additionally, reduction of buffers (as identified in the plan) would be based on recommendations of the biological monitors in the field and approved by the SCE project biologist.	Please revise as follows: " <i>Nesting Bird</i> : If Project construction activities would occur during the nesting season (February 15 – September 15), a qualified biologist would survey construction areas for active nests. If active nests are identified, construction activities would not occur within 200 feet of the active nest. If active nests are identified, a project specific nesting bird management plan would be developed and include appropriate buffers based on species specific biology and behavior. Additionally, reduction of buffers (as identified in the plan) would be based on recommendations of the biological monitors in the field and approved by the SCE project biologist. "
38.	Chapter 2	2-17	Under the heading 2.8 Construction , please include the following bullet point under the project construction elements.	Please revise as follows: " <u>Decommissioning of the existing Nuevo and temporary Model Pole Top Substations.</u> "

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
39.	Chapter 2	2-17	Under the heading 2.8.1 Access Roads , please add in additional clarification regarding the rehabilitation of the access roads.	Please revise as follows: "For the subtransmission source line segments and <u>Telecommunication Line</u> , access roads would parallel the poles and existing roads would be used where available. If rehabilitation is required for <u>existing roads</u> to accommodate construction activities, related activities could include: grading and repair, vegetation clearance and grubbing, blade-grading to remove surface irregularities, re-compaction of the surface, <u>drainage and erosion</u> , to ensure a minimum drivable width of 14 feet (preferably with an additional 2 feet of shoulder on each side, depending upon field construction)."
40.	Chapter 2	2-17	Under the heading 2.8.1 Access Roads , please add in clarification regarding the installation of new access roads.	Please revise as follows: "New roads (up to 3.5 miles) would be needed to access the new subtransmission source line segments, resulting in a disturbance of approximately 8-0 <u>5.94</u> acres. Construction of new access roads would include clearing the road alignments and grubbing them of vegetation, blade-grading to remove surface irregularities, <u>over-excavation and re-compaction</u> , <u>installation of drainage and erosion control devices</u> . Like existing roads, new roads would be constructed to provide a minimum <u>drivable</u> width of 14 feet, with an additional 2 feet of shoulder on each side. Road gradients would be leveled so that any sustained grade would not exceed 12 percent. A 14 percent gradient would be permitted if grades do not exceed 40 feet in length and are located more than 50 feet from other excessive grades or any curves. Excess excavated material from grading the access roads would be properly disposed of <u>off-site, if required.</u> "
41.	Chapter 2	2-18	Under the heading 2.8.1 Access Roads , please add in additional clarification that design will be determined during final engineering.	Please revise as follows: "Typical construction for an aggregate road base would start with excavating the road at least 18 inches. 10-inches of soil would be restored and compacted to 95 percent density establishing the subgrade. Then, an 8-inch aggregate road base would be placed and compacted to at least 95 percent relative density over the subgrade. <u>Final material selection and design to be determined during final engineering, and coordinated with local agencies.</u> "

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
42.	Chapter 2	2-18	Regarding Table 2-2 , please correct the New Access Road component to 3.5 miles for the Number Of Sites. Include an updated Acres Disturbed During Construction of 5.94 acres and Acres Permanently Disturbed of 5.94 acres. Additionally, please correct the rehabilitation of existing access roads for telecommunications to 1 mile for the Number Of Sites. Include an updated Acres Disturbed During Construction of 0.7 acres and Acres Permanently Disturbed of 0.7 acres.	
43.	Chapter 2	2-20	Under the heading 2.8.3 Staging Area/Laydown Area , Table 2-8 on page 2-25 includes information relative to construction and laydown areas for the various subtransmission components. Additionally, regarding the title for Table 2-8 it is suggested that the title be updated to include reference to laydown areas.	Please revise as follows: " Up to 90 laydown areas would be required; each no larger than 20,000 square feet (typically 200 feet by 100 feet). For information pertaining to the number and approximate size of laydown areas, please reference Table 2-8." Please revise title in Table 2-8: "Disturbed Acreage (Laydown Area) Calculation (L x W)"
44.	Chapter 2	2-20	Under the heading 2.8.3 Staging Area/Laydown Area , laydown areas will be controlled by the SWPPP, please revise accordingly.	Please revise as follows: "The laydown areas would be prepared by clearing existing vegetation and grading (SCE, 2011). Soils in the laydown areas would be stabilized as soon as practical after soil disturbing activities have occurred or one day prior to the onset of precipitation. "
45.	Chapter 2	2-21	Under the heading Ground Grid , please revise the text to provide clarification on the construction of the ground grid.	Please revise as follows: "The ground grid consists of <u>bare copper conductor installed in a series of trenches within the substation perimeter to connect ground</u> the various components of the substation. A backhoe would be used to dig the trenches. <u>The grid conductors are buried at a depth of 12 to 18 inches. Ground rods and ground electrodes may also be required depending on soil conditions. which would be lined with concrete to house the conduit. Where below grade construction would occur (not in fill soil)</u> The design of the ground grid would be based on soil resistivity measurements collected during the geotechnical investigation."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
46.	Chapter 2	2-23	Under the heading Duct banks and Conduits , please revise for the reasons described in SCE's accompanying cover letter and replace it with the information provided regarding the work to occur in the vicinity of the existing Alessandro Substation.	Please revise as follows: " <u>Telecommunications</u> duct banks would be installed in a backhoe-excavated trench approximately 18 inches wide by 36 inches deep. Five-inch PVC conduit would be placed in the open trench, covered with slurry, and then covered with back-filled material and compacted. A 3 foot by 5 foot by 3 foot concrete pull box would be installed near the northwest corner of substation site approximately 20 feet south of the north perimeter wall of the Lakeview Substation. and near the southeast section of Moyal Substation, approximately 40 feet west of the east-perimeter wall. A concrete manhole, approximately 4 feet by 4 feet by 5 feet, would be installed at the following locations: outside Moyal Substation near the east side of Moreno Beach Drive, approximately 465 feet south of Cottonwood Avenue; near the east side of Moreno Beach Drive, approximately 368 feet south of Bay Street; and near the east side of Moreno Beach Drive, approximately 205 feet south of Alessandro Boulevard."
47.	Chapter 2	2-21	Under the heading Equipment Foundations , please correct the number of TSPs to be consistent with SCE's PEA and CPUC's DEIR Figure 2-3 on page 2-6.	Please revise as follows: "Installation of substation equipment (including switchracks, the MEER, transformer banks, capacitor banks and two <u>four</u> TSPs) would require the construction of concrete foundations."
48.	Chapter 2	2-22	Regarding Table 2-5 , the footnote states the following "a Excavation "spoils" would be permanently placed on site during the below-ground construction phase" it should be clarified that spoils may be placed on site.	Please revise as follows: "Excavation "spoils" would <u>may</u> be permanently placed on site during the below-ground construction phase."
49.	Chapter 2	2-23	Under the heading Detention Basin , please revise to clarify SCE will obtain ministerial permits as required.	Please revise as follows: "Prior to substation construction, SCE would obtain any ministerial grading permits from the County of Riverside as required, at which time a final site drainage plan would be determined."
50.	Chapter 2	2-24	Under the heading 2.8.4.2 Above-Grade Construction , please clarify that there will be a total of 20 days for deliveries however the amount of asphalt would not change. Additionally, SCE used the duration of 5 days, as submitted in a previous data request, in order to prepare a conservative air quality analysis.	Please revise as follows: "It would be delivered by trucks approximately 9 times per day for a <u>total duration of 5</u> days (potentially not consecutive) for Lakeview Substation construction (SCE, 2011)."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
51.	Chapter 2	2-25	<p>Regarding Table 2-8, please add an additional row to the table for Telecommunications pull and tension sites, quantity 7, disturbance area 150' by 100'. Acreage Disturbed during Construction will be 2.4. Acres to be Restored 2.4.</p> <p>Additionally, regarding Table 2-8, for the 115 kV conductor stringing splicing set up area, please revise the quantity from 4 sites to 3 sites. The revised Acreage Disturbed during Construction will be 1.0. Acres to be Restored 1.0.</p>	
52.	Chapter 2	2-27	<p>Under the heading 2.8.5.4 Conductor/Wire Stringing, please make this suggested revision to be consistent with Table 2-8.</p>	<p>Please revise as follows: "The dimensions of the area needed for the wire stringing set-ups associated with wire installation are variable and depend upon terrain. These activities generally require an area of approximately 50 <u>200</u> feet wide by 100 feet long."</p>
53.	Chapter 2	2-28	<p>Under the heading 2.8.5.6 Removal of Existing Poles, for clarification purposes, please revise lines to facilities.</p>	<p>Please revise as follows: "Prior to removal of existing poles, the existing subtransmission lines, distribution lines and telecommunication lines (where applicable) would be transferred to the new poles; all remaining subtransmission, distribution and telecommunication lines facilities that are not reused by SCE would be removed (above- and below-ground) and delivered to a facility for recycling."</p>
54.	Chapter 2	2-28	<p>Under the heading 2.8.5.5 Telecommunications System Installation and Upgrades, please revise for the reasons described in SCE's accompanying cover letter and replace it with the information provided regarding the work to occur in the vicinity of the existing Alessandro Substation.</p>	<p>Please revise as follows: "Underground telecommunications facilities would be installed in new and existing duct banks which include pull boxes and manholes, in the substation site, on 10th Street outside of the substation site, in the Alessandro Substation site on John F. Kennedy Drive and on Kitching Street in the Meval Substation site and on Moreno Beach Drive outside of the Meval Substation site. Concrete would be delivered to the Project site by trucks approximately four times per day for telecommunications construction for a duration of 7.5 days (SCE, 2011)."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
55.	Chapter 2	2-29	<p>Under the heading 2.8.6.1 Site Cleanup and Restoration, it should be clarified that the reseeded as described in the following sentence is for soil stabilization purposes:</p> <p>“Activities associated with restoration of these areas would include restoring original contours and reseeded with an appropriate seed mix, to the extent feasible.”</p>	<p>Please revise as follows: “Activities associated with restoration of these areas would include restoring original contours and reseeded with an appropriate seed mix for <u>soil stabilization</u>, to the extent feasible.”</p>
56.	Chapter 2	2-29	<p>Under the heading 2.8.6.2 Hazardous Materials Use, Storage, and Disposal, please clarify that wood poles removed would be handled in accordance with California Health & Safety Code Division 20, Article 4, Section 25143.1.5 and hazardous wastes generated during site activities would be disposed at the properly permitted Class I hazardous landfill.</p>	<p>Please revise as follows: “Depending on the type, condition and original chemical treatment, wood poles removed from the site could be reused by SCE for other purposes, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion of a RWQCB-certified municipal landfill. <u>consistent with the requirements set forth in the California Health & Safety Code Division 20, Article 4, Section 25143.1.5</u></p> <p><u>Hazardous wastes generated during site activities would be disposed at the properly permitted Class I hazardous landfill.</u> There are two major permitted Class I hazardous waste landfills located in California: Chemical Waste Management Kettleman Hills Landfill, located in Kettleman City; and Clean Harbors Buttonwillow Landfill, located in Buttonwillow. The Kettleman Hills facility has approximately 6,000,000 cubic yards of remaining capacity and is not expected to close until 2037-2038. The Buttonwillow facility has approximately 9,500,000 cubic yards of remaining capacity and is not expected to close until 2040.”</p>
57.	Chapter 2	2-29	<p>Under the heading 2.8.6.2 Hazardous Materials Use, Storage, and Disposal, clarification is provided for the handling of non-hazardous waste that is not used as fill.</p>	<p>Please revise as follows: “Non-hazardous waste, including soil <u>that is not used as fill</u>, would be transported to one of the three riverside County solid waste management facilities located within 30 miles of the substation site.”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
58.	Chapter 2	2-30	Under the heading 2.9 Decommissioning the Nuevo Substation and Model Pole Top Transformer , the installation of Model Pole Top was completed in 2009 and is consistent with SCE's PEA.	Please revise as follows: "The temporary Model Pole Top Substation was installed at the corner of Lakeview Avenue and East Lakeview Avenue in 2007 <u>2009</u> to supplement capacity at the Nuevo Substation until a new substation project could be constructed to provide electrical service in the Electrical Needs Area."
59.	Chapter 2	2-31	Under the heading 2.9.1 Nuevo 33/12 kV Substation , please remove the sentence to be consistent with the language in the DEIR that describes the import/export activities.	Please revise as follows: "Site restoration activities would include re-compaction, rough grading to restore contours for drainage purposes so that the rate and direction of stormwater flow after decommissioning would be the same as existing conditions, and reseeded with native or other appropriate seed mix. No import or export of fill/soils would be necessary. "
60.	Chapter 2	2-32	Under heading 2.9.2 Model Pole Top Substation , fifth paragraph, Model Pole Top should be referenced as a "temporary Model Pole Top Substation," as described in SCE's PEA.	Please revise as follows: "Site restoration activities associated with the <u>temporary Model Pole Top Substation</u> which include re-compaction..."
61.	Chapter 2	2-33	Under the heading 2.10 Project Operation and Maintenance , SCE does not have the option of ground and/or aerial observation for annual inspections on our subtransmission energized lines.	Please revise as follows: "SCE maintains an inspection frequency of the energized subtransmission overhead facilities a minimum of once per year via ground and/or <u>observation with the option of aerial observation on alternate years.</u> "
62.	Chapter 2	2-33	Under the heading 2.11 Water and Wastewater , please revise to reflect the accurate water usage necessary during construction on a daily basis.	Please revise as follows: "Approximately 32,000 <u>62,000</u> gallons per day would be necessary, and would be delivered to the site by water trucks eight times a day (SCE, 2011)."
63.	Chapter 2	2-36	Regarding Table 2-9 , please insert a footnote to clarify the fuel type of the vehicles.	Please insert the following footnote: "Diesel fueled vehicles could be interchangeable with gasoline fueled vehicle as seen in this table based on contractor and/or equipment availability."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
64.	Chapter 2	2-36 – 2-37	<p>Regarding Table 2-9 under the heading 115 kV Subtransmission Line Construction, please update the number of work days for the following activities:</p> <p>Survey – 13 days Guard Structure Installation – 5 days Remove Existing Wood Poles – 5 days Install TSP Foundation – 41 days Install Subtransmission Wood Poles – 28 days Steep Pole Haul – 9 days Steel Pole Assembly – 9 days Steel Pole Erection – 9 days Install Conductor – 15 days Guard Structure Removal – 4 days</p>	<p>Please revise as follows: Survey – <u>13</u> days Guard Structure Installation – <u>2 5</u> days Remove Existing Wood Poles – <u>4 5</u> days Install TSP Foundation – <u>34 41</u> days Install Subtransmission Wood Poles – <u>19 28</u> days Steep Pole Haul – <u>5 9</u> days Steel Pole Assembly – <u>6 9</u> days Steel Pole Erection – <u>6 9</u> days Install Conductor – <u>10 15</u> days Guard Structure Removal – <u>2 4</u> days</p>
65.	Chapter 2	2-37	<p>Regarding Table 2-9 under the heading Telecommunications Construction, for the reasons described in SCE's accompanying cover letter, please adjust the number of work days for Roads & Landing Work.</p>	<p>Please revise as follows: "<u>46 1</u>"</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
66.	Chapter 2	2-38	Under the heading 4.4.3 Applicant Proposed Measures regarding APM-Bio-3: Stephen's Kangaroo Rat, please revise the APM to accurately reflect the habitat assessment work conducted for Stephen's kangaroo rat surveys for the Proposed Project.	Please revise as follows: "A habitat assessment for Stephens' kangaroo rat shall be conducted by a biologist qualified to conduct Stephen's kangaroo rat surveys along Segment 1, 2 and 3 and the Proposed Telecommunications Route for the entire Proposed Project. Protocol level trapping was conducted along Subtransmission Segment One and Two. Stephens' kangaroo rat was detected along Segment One. The proposed project is in a Stephens' kangaroo rat fee area; therefore, to mitigate for potential impacts to this species, SCE will pay a fee in coordination with the Regional Habitat Conservation Authority. If no potential occupied habitat is found during this assessment, then no further action is necessary. If potential for occupied habitat is found, protocol trapping surveys shall be conducted. The Proposed Telecommunications Route is within a Stephens' kangaroo rat fee area; therefore, if suitable habitat for this species is found, a fee shall be paid in lieu of further surveys (County of Riverside, 1996)."
67.	Chapter 2	2-39	Under the heading 2.13.2 Biological Resources , please incorporate the previously explained edits (Executive Summary comments) regarding APM-Bio-6 and APM-Bio-7.	
68.	Chapter 2	Table 2-2	Regarding Table 2-2 , please revise the number of miles to be consistent with the description provided on page 2-17. The additional areas needed for the turnaround is described in SCE's accompanying cover letter, please revise from 5.1 to 5.94 acres.	Table Row :New Access Roads should read -Number of Sites: 3 <u>3.5</u> miles -Acreage Disturbed during Construction: 5.1 <u>5.94</u> -Acreage Permanently Disturbed: 5.1 <u>5.94</u>
69.	Chapter 2	Table 2-2	Regarding Table 2-2, based on the reasons previously provided regarding Fiber Optic Cable Route 3, the number of miles of rehabilitated access roads for telecom need to be updated.	"Rehabilitation of Existing Access Roads for Telecommunications" -Number of Sites: 8 <u>1</u> -Acreage Disturbed during Construction: 7.75 <u>0.7</u> -Acreage Permanently Disturbed: 7.75 <u>0.7</u>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
70.	Chapter 3	3-4	<p>Under the heading 3.2.3 Feasibility, a footnote should be added to the following sentence, "In addition, CEQA requires that the Lead Agency consider site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations..."</p> <p>The footnote should explain that per GO 131-D, local jurisdictions are preempted from enforcing local land use and zoning regulations and discretionary permitting requirements, therefore general plan consistency is included in the analysis, but such general plan policies, goals and land use designations are not applicable to the Proposed Project.</p>	<p>Please insert the following footnote: "<u>CPUC GO 131-D, Section XIV.B states that "local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission's jurisdiction. However in locating such projects, the public utilities shall consult with local agencies regarding land use matters." Consequently, public utilities are directed to consider local regulations and consult with local agencies, but the county and city regulations are not applicable as the county and cities do not have jurisdiction over the Proposed Project."</u></p>
71.	Chapter 3	3-6	<p>Regarding Table 3-2 Summary of Alternatives Screening Analysis-Lakeview Substation Project, the environmental criteria related to Alternative 1 makes mention of Noise criteria more than once, therefore one of the statements should be deleted.</p>	<p>Please revise as follows: "Noise: construction noise impacts would be similar and operational noise impacts would be the same as under the project."</p>
72.	Chapter 3	3-6	<p>Regarding Table 3-2 Summary of Alternatives Screening Analysis-Lakeview Substation Project, as stated in SCE's accompanying cover letter, please remove all references to the approximately 2-3 miles of distribution line from Nuevo Substation to Bunker Substation.</p>	
73.	Chapter 3	3-6	<p>Under the heading Alternative 2: Relocated Substation, please clarify the alternative 2 relocated substation site will require the same number of TSPs as the proposed substation site.</p>	<p>Please revise as follows: "Require 3-5 fewer the same number of TSPs to be constructed at the proposed substation site."</p>
74.	Chapter 3	3-6	<p>Under the heading Alternative 2: Relocated Substation, please clarify the distance will be reduce by 1,320 feet.</p>	<p>Please revise as follows: "Not change the location of the proposed alignment running southwest-southeast down 10th and 11th Streets, but would reduce the distance of the run by approximately 2,900 1,320 feet."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
75.	Chapter 3	3-8	Please see SCE's accompanying letter for concerns related to technical feasibility of Alternative 1: Phased Construction Alternative..	
76.	Chapter 3	3-8	Regarding Alternative 1, under the heading Construction , the text indicates that the construction activities would be extended to an approximate total of 22 months, however SCE's calculation estimates that construction would be extended to approximately 23.6 months which would be rounded to 24 months.	Please revise as follows: "...except for the construction schedule, which would be extended by approximately 10 months to a total of approximately 22 <u>24</u> months to reduce the overlap in construction of four project components..."
77.	Chapter 3	3-9	Under the heading 3.4.2 Alternative 2: Relocated Substation Alternative , please also clarify the subtransmission line segment along 11 th Street would not run between "A Avenue" and Reservoir Avenue. In addition, the distance will be reduced by 1,320 feet.	Please revise as follows: "The subtransmission line segments along 10 th and 11 th Streets would proceed as proposed for the Project but would not run between "A Avenue A" and Reservoir Avenue on 11 th Street, and as a result the subtransmission line route for this alternative would be approximately 2,900 <u>1,320</u> feet shorter overall than for the Project."
78.	Chapter 3	3-9	Under the heading Potential New Impacts Created , please remove reference to the 12kV distribution line as it is no longer required for construction under Alternative 1.	Please revise as follows: " Potential New Impacts Created Placement of the temporary distribution line between the Nuevo and Bunker Substations under Alternative 1 would result in an increase in vehicle trips and potential new temporary lane closures, resulting in increased air pollutant emissions, noise effects near sensitive land uses, and transportation and traffic impacts."
79.	Chapter 3	3-10	Regarding Figure 3-1 , the number of wood poles on 10 th Street is incorrect and should be corrected to reflect the correct pole count of 26-28 wood poles on 10 th Street. Remove second reference to 3-5 new TSPs at the substation site as there will only be 3-5 total TSPs. Please note wood poles would also be replaced north of 10 th Street as well as south of 11 th Street within the Valley-Moyal 115 kV alignment and are a part of the total count already referenced.	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
80.	Chapter 3	3-10	Regarding Figure 3-1 Alternative 2 , please remove Fiber Optic Cable Route 3 from the figure for the reasons described in SCE's accompanying cover letter. It is suggested that the view be expanded to include Alessandro Substation.	
81.	Chapter 3	3-11	Regarding Alternative 2, under the heading Lessen Significant Environmental Impacts , the document states, "The purpose of Alternative 2 is to reduce the significant environmental impacts of the Project related to air quality by requiring less construction due to shorter length of the subtransmission line routes. This would reduce construction related emissions of NOx and PM10." SCE provided the CPUC with air quality calculations for Alternative 2 that indicated that the NOx and PM10 construction related emissions would not be reduced below the significance levels.	Please revise as follows: " The purpose of Alternative 2 is to reduce the significant environmental impacts of the Project related to air quality by requiring less construction due to shorter length of the subtransmission line routes. This would reduce construction related emissions of NOx and PM10. "
82.	Chapter 3	3-13	Regarding Alternative 5, under the heading Description , please delete the reference to 16 kV as this voltage is not available in this area.	Please revise as follows: "Distributed generation is electricity production that is on-site or close to the load center that could be interconnected at 16 kV distribution, subtransmission, or transmission system voltages."
83.	Intro to Environmental	4-2	Under the heading Introduction to Environmental Analysis , regarding the fifth bullet point, for the reasons described in SCE's accompanying cover letter, please update the description related to telecommunication access road rehabilitation.	Please revise as follows: "Potential telecommunications line access road rehabilitation in case it becomes necessary to conduct Project work along the existing Valley-Moval Subtransmission Line. "
84.	Intro to Environmental	4-4 – 4-5	Under the heading Applicant Proposed Measures , please make the previously described edits (as explained in Executive Summary) to APM Bio-6 and APM Bio-7.	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
85.	Intro to Environmental	4.5	Regarding APM Bio-7 , it should be clarified that if impacts to Crownscale are unavoidable, SCE would participate in the MSHCP.	Please revise as follows: " APM Bio-7, Avoidance of San Jacinto Valley Crownscale Populations: In order to avoid potential impacts to known populations of San Jacinto Valley crownscale populations, an Environmentally Sensitive Area (ESA) will be developed prior to construction to the extent feasible in the final Project Design (Isee PEJ Figure 4.4-5). If significant impacts to San Jacinto Valley crownscale are unavoidable, a biologist will be selected to prepare and implement a mitigation plan, which will include detailed descriptions of maintenance appropriate for the mitigation site; monitoring requirements; and annual report requirements, and will have the full authority to suspend any operation which is, in the biologist's opinion, not consistent with the mitigation plan. This plan will be submitted for review to the appropriate agencies." SCE would participate in the MSHCP to mitigate for impacts to this species.
86.	Chapter 4.1	4.1-3	On Figure 4.1-1, in the legend under the heading Fiber Optic Cable Routes , remove Route 3. On Figure 4.1-1, remove Fiber Optic Cable Route 3; include location of Alessandro Substation to provide geographical reference of substations where ground disturbance would occur as a result of construction	Please revise Figure 4.1-1 Visual Study Area and Viewshed to remove Fiber Optic Cable Route 3 and replace with location of Alessandro Substation
87.	Chapter 4.1	4.1-4	Under the heading Visual Study Area , please replace the reference to Fiber Optic Route 3 with Fiber Optic Cable installation at Alessandro Substation to be consistent with the change in Project Description.	Please revise as follows: "Fiber-Optic Cable installation at Alessandro Substation Route 3 along the existing Valley Meval 115kV Subtransmission Line is not included as part of the visual study area because it involves the addition of <u>one underground cable and conduit to an existing transmission line corridor</u> and this does not represent a readily perceivable visual change for public viewers."
88.	Chapter 4.1	4.1-5	On Figure 4.1-2, please remove all references to Fiber Optic Cable Route 3, per SCE's accompanying cover letter, in the legend under the heading Fiber Optic Cable Routes , remove Route 3.	Please revise Figure 4.1-2 Location of Key Observation Points and Context Photographs to remove Fiber Optic Cable Route 3.

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
89.	Chapter 4.1	4.1-9	Under the heading Lakeview Substation Site , the substation is not located at the northwest of the intersection of 10 th Street and Reservoir Avenue, but rather at the southwest portion of the intersection.	Please revise as follows: “The Lakeview Substation Site is location in an agricultural field north-southwest of the intersection of 10 th Street and Reservoir Avenue.”
90.	Chapter 4.1	4.1-9	Under the heading Motorists , the document explains the Ramona Expressway as a designated scenic corridor by Riverside County, however the Ramona Expressway is actually designated as a county eligible scenic highway.	Please revise as follows: “The only relevant County eligible scenic roadway in the visual study area is the Ramona Expressway, which is designated eligible as a scenic corridor by Riverside County...”
91.	Chapter 4.1	4.1-11	Under the heading Visual Sensitivity , it appears that the remainder of the following sentence is missing: “However, the visual sensitivity of the Project as viewed from parks and trails is generally in the moderate-to-high range due to the change” The change from “what” should be explained.	Please complete the thought associated with the sentence.
92.	Chapter 4.1	4.1-15	Regarding Figure 4.1-8 “Existing and Simulated View of Project from KOP-4” , both the Existing View photo and Simulated View photo have been cropped- excluding approximately 1/3 of the original image on the right side of the photo, as seen in the PEA. This portion of the image should be included as a portion of the simulated subtransmission line is now unseen.	Please refer to “PEA Lakeview Substation Project”, Volume 1 of 2, filed September 17, 2010. Chapter 4.1, page 4.1-15, Figure 4.1-9a & 9b, show the same Existing View and Simulated View un cropped.
93.	Chapter 4.1	4.1-24	Under the heading No Impact Significance Determinations , it should be clarified that fiber optic cables would follow existing or proposed utility lines.	Please revise as follows: “Because the fiber optic cables would not be visible or would follow existing or proposed utility lines, the telecommunications facilities would have a less-than-significant impact with respect to all visual resources significance criteria.”
94.	Chapter 4.1	4.1-25	Under the heading Impact 4.1-1 , it should be clarified that the Ramona Expressway is a County Eligible Scenic Highway not a designated local scenic highway by Riverside County.	Please revise as follows: “While there are no officially designated scenic vista points in the Project area, the Ramona Expressway is designated-as-a considered an eligible local scenic highway by Riverside County.”

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
95.	Chapter 4.1	4.1-25	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Have a substantial adverse effect on a scenic vista, no additional impacts would result during construction, operation, and maintenance of the underground fiber-optic cable installation within and adjacent to Alessandro Substation. This impact is evaluated based on visual impacts from Ramona Expressway, a designated local scenic highway, which is greater than 6 miles from Alessandro Substation; temporary construction activity would not be visible or result in view shed impacts from the construction, operation, and maintenance of Expressway.</p>	
96.	Chapter 4.1	4.1-26	<p>Under the heading Impact 4.4-1 (Construction), please change existing to existing when referencing the decommissioning activities.</p>	<p>Please revise as follows: “Decommissioning activities are unlikely to be perceived negatively by the motorist because it is an existing existing site with low visual quality and similar construction activities are not uncharacteristic of undeveloped areas.”</p>
97.	Chapter 4.1	4.1-27	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Substantially degrade the existing visual character or quality of the site and its surroundings, because construction activity within and adjacent to Alessandro Substation would be temporary, and because the finished project would be underground, no additional impacts would result.</p>	
98.	Chapter 4.1	4.1-28	<p>Under the heading KOP 4, the text references several existing lines, for clarification, there is only one subtransmission line.</p>	<p>Please revise as follows: “Although there are several existing subtransmission and distribution lines structures (or facilities) visible from the San Jacinto River corridor....”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
99.	Chapter 4.1	4.1-28	Under the heading KOP 4 , regarding APM Aesthetics-1 , SCE may not be able to utilize trees in the substation perimeter landscaping design based on standard clearance requirements from the Subtransmission lines and substation equipment, therefore it is suggested that references to trees be removed.	Please revise as follows: “APM Aesthetics-1 would reduce the color contrast of the substation perimeter wall with the surrounding area by landscaping the outer perimeter with green shrubs and trees that would be more compatible with the rural residential and agricultural surroundings.”
100.	Chapter 4.1	4.1-29	Under the heading KOP 6 , regarding APM Aesthetics-1 , SCE may not be able to utilize trees in the substation perimeter landscaping design based on standard clearance requirements from the Subtransmission lines and substation equipment, therefore it is suggested that references to trees be removed.	Please revise as follows: “APM Aesthetics-1 would reduce the color contrast of the substation perimeter wall with the surrounding area by landscaping the outer perimeter, thereby placing green shrubs and trees that would be more compatible with the rural residential and agricultural surroundings and discouraging graffiti.”
101.	Chapter 4.1	4.1-31	Under the heading Alternative 1: Phased Construction Alternative , the construction duration would be extended by 12 months, not 10 months. Please revise to reflect the accurate construction duration.	Please revise as follows: “The visual impacts of construction activity would be extended by an additional 10 <u>12</u> months...”
102.	Chapter 4.1	4.1-32	Under the heading Alternative 1: Phased Construction , it should be clarified that phased construction would not reduce the number of personnel, vehicles and machinery operating at any one time at Lakeview Substation, but rather would reduce the number of personnel, vehicles and machinery operating at any one time on the project as a whole.	Please revise as follows: “ At the proposed Lakeview Substation site For the Project, this is likely to reduce the number of personnel, vehicles, and machinery operating at any one time, thereby reducing the visual clutter and activity of an active construction site, but is not likely to reduce the general visual presence of cleared ground, fencing, material stockpiles or construction-related equipment.
103.	Chapter 4.1	4.1-32	Under the heading Alternative 2: Relocated Substation Alternative , the text references the Lakeview Substation would be located 0.25 miles further away from local roads and residences; however, the distance is likely closer to 0.125 miles.	Please revise as follows: “Under Alternative 2, the proposed Lakeview Substation would be located approximately 0.25 <u>0.125</u> mile further away from the affected local roads and residences, thereby significantly reducing the level of visual impact from KOPs 5, 6, 7 and 8.”
104.	Chapter 4.1	4.1-33	Under the heading No Project Alternative , there are two conflicting statements regarding the impact determination, it is suggested that one be deleted as there is no potential for impact if no facilities are being built.	Please revise as follows: “Under the no Project alternative, there would be no impacts to aesthetics because the Project area would remain in its current condition. As such, while the No Project Alternative would result in reduced impacts compared to the Project, impacts would remain less than significant. ”

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
105.	Chapter 4.2	4.2-1	<p>Under the heading Regional and Local Setting, please revise the following description for the reasons described in SCE's accompanying cover letter and replace it with the information provided regarding the work to occur in the vicinity of the existing Alessandro Substation:</p> <p>"The majority of the lands within the Project site are located within the Lakeview/Nuevo Planning Area, while portions of the telecommunication system extend into the MSHCP area and the City of Moreno Valley."</p>	<p>Please revise as follows: "The majority of the lands within the Project site are located within the Lakeview/Nuevo Planning Area, while portions of the telecommunication system extend into the MSHCP area and the City of Moreno Valley."</p>
106.	Chapter 4.2	4.2-2	<p>Under the heading California Farmland Mapping and Monitoring Program, the definition of Prime Farmland needs to be updated to include additional language relevant to the defining criteria used by the California Department of Conservation (http://www.conservation.ca.gov/dlrp/fmmp/Documents/soil_criteria.pdf).</p>	<p>Please include the following language after the last sentence 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>"</p>
107.	Chapter 4.2	4.2-2	<p>Under the heading California Farmland Mapping and Monitoring Program, the definition of Unique Farmland needs to be updated to include additional language relevant to the defining criteria used by the California Department of Conservation (http://www.conservation.ca.gov/dlrp/fmmp/Documents/soil_criteria.pdf).</p>	<p>Please include the following language after the last sentence of the existing definition, "<u>Land must have been cropped at some time during the four years prior to the mapping date.</u>"</p>
108.	Chapter 4.2	4.2-2	<p>Under the heading California Farmland Mapping and Monitoring Program, the definition of Farmland of Statewide Importance needs to be updated to include additional language relevant to the defining criteria used by the California Department of Conservation (http://www.conservation.ca.gov/dlrp/fmmp/Documents/soil_criteria.pdf).</p>	<p>Please include the following language after the last sentence 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>"</p>
109.	Chapter 4.2	4.2-2	<p>Regarding Table 4.2-1 Farmland Conversion From 2006 – 2008 in Riverside County the table portrays changes in overall acreage between 2006 and 2008; however, these differences are then labeled as changes from 2004 to 2006 in the right side of the table.</p>	<p>Please revise as follows: "2004-2006 <u>2006-2008</u> Acreage Changes"</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
110.	Chapter 4.2	4.2-3	Regarding Figure 4.2-1 Important Farmland and Williamson Act Contracted Land in the Project Vicinity , please remove Fiber Optic Cable Route 3 from the figure and change the view of the figure to include Alessandro Substation for the reasons described in SCE's accompanying cover letter.	
111.	Chapter 4.2	4.2-5	Under the heading, Riverside County Zoning Ordinance , per General Order (GO) 131-D, the referenced zoning ordinances would not apply to the Project.	Please insert the following language at the beginning of the existing paragraph, "CPUC General Order 131-D explains that local zoning ordinances would <u>not</u> apply to the Project, therefore, the following information is provided for informational purposes only."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
112.	Chapter 4.2	4.2-6	<p>Regarding Impact 4.2-1, since any disturbance will be temporary in nature, there will be no permanent conversion of farmland. Therefore, Mitigation Measures 4.2-1a and 4.2-1b are not warranted.</p> <p>Additionally, Mitigation Measure 4.2-1a would not be warranted because the Project will be required to obtain coverage under the State Water Resources Control Board Construction General Permit (2009-0009-DWQ). As required by this permit, additional measures will be implemented to further reduce the impacts to designated Farmland as a result of soil loss, erosion, and sedimentation.</p> <p>Furthermore, SCE will dispose of any excess soil at an appropriately licensed waste facility.</p> <p>Excavation will exceed the three foot depth at the substation location, pole locations, and access roads. The soil at the substation will be recompacted per the grading plan while any excess excavated soils from the pole locations, and access roads will be disposed of at an SCE approved disposal facility. Soil densities would be based upon engineering requirements which would often defer the implementation of returning soil density to within 5% of original soil density.</p> <p>The fugitive dust mitigation requirement for the project requires the use of water to control fugitive dust (SCAQMD Rule 403) and therefore avoiding traveling on wet soil is not feasible.</p> <p>Lastly, SCE may work with individual property owners to develop a different method for disposition of topsoil that is impacted on private property, assuming a mutual agreement may be reached.</p>	Please remove Impact Analysis 4.2-1 and Mitigation Measure 4.2-1a and Mitigation Measure 4.2-1b.

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
113.	Chapter 4.2	4.2-6	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, there would be no additional impacts resulting from the construction, operation, and maintenance of the underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation based on location within the existing substation footprint and roadway.</p>	
114.	Chapter 4.2	4.2-8	<p>As explained above in comment #112, Mitigation Measure 4.2-1b is not warranted. Additionally, it should be noted that the mitigation measure is problematic for the following reasons:</p> <p>“Growing season” is undefined and may vary depending on crop type and the particular landowner. Therefore, it does not seem appropriate to include this requirement in the mitigation measure.</p> <p>SCE typically negotiates and compensates the property owner for any crop take and for liability reasons, would not perform crop replacement. Therefore, it does not seem appropriate to include this requirement in the mitigation measure.</p>	
115.	Chapter 4.2	4.2-8	<p>Under the heading Impact 4.2-2, regarding Table 4.2-3 Estimated Permanent Disturbance of Farmland, the table lists permanent impacts to designated Farmland resulting from the listed project components differs from those specified in Table 4.2.2 of the PEAs.</p> <p>Additionally, please confirm the total as seen in the table.</p>	<p>SCE suggests that the calculations used to determine the acreage of permanent impacts to designated Farmland resulting from the Subtransmission Source Line and Poles be reconfirmed to ensure their accuracy.</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
116.	Chapter 4.2	4.2-8	Under the heading Impact 4.2-2 , regarding Table 4.2-3 Estimated Permanent Disturbance of Farmland, footnote "d" is referenced in the "Total" row; however, no note is provided at the bottom of the table.	Please provide the footnote referenced as "d" in the table.
117.	Chapter 4.2	4.2-8	Under the heading Impact 4.2-2 . Regarding Mitigation Measure 4.2-2 , the measure should clarify that SCE could acquire and establish an easement, rather than granting an easement.	Please revise as follows: "...SCE shall grant a would acquire farmland and would establish an easement for the portion of the land that will no longer be used for agricultural land equal to the acreage converted (e.g. 7.9 acres). This land shall be in an area designated for long-term future agricultural use; or..."
118.	Chapter 4.2	4.2-9	Under the heading Impact 4.2-2 , several references are made to "7.9 acres" of permanent impacts to designated Farmland; however, based on the data provided in Table 4.2-3 Estimated Permanent Disturbance of Farmland, this should be described as 7.8 acres.	Please update all references to permanent impacts within the text to be consistent with Table 4.2-3.
119.	Chapter 4.2	4.2-9	Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows: Under CEQA criteria b) Conflict with existing zoning for agricultural use, or a Williamson Act contract , there would be no additional impacts resulting from the construction, operation, and maintenance of underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation based on location within the existing substation footprint and roadway.	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
120.	Chapter 4.2	4.2-10	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined in Public Resources Code §4526) or timberland zoned Timberland Production (as defined by Government Code §51104(g)), there would be no additional impacts resulting from the construction, operation, and maintenance of underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation based on location within the existing substation footprint and roadway.</p>	
121.	Chapter 4.2	4.2-10	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) Result in the loss of forest land or conversion of forest land to non-forest use, there would be no additional impacts resulting from construction, operation, and maintenance of underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation based on location within the existing substation footprint and roadway.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
122.	Chapter 4.2	4.2-10	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use, there would be no additional impacts resulting from the construction, operation, and maintenance of underground fiber-optic cable and conduit installation within and adjacent to based on location within the existing substation footprint and roadway.</p>	
123.	Chapter 4.2	4.2-11	<p>Under heading Impact 4.2-3, the discussion includes the following statement:</p> <p>“In addition, there would be a less-than-significant impact related to the conversion of Farmland from induced growth caused by the Project. The Project is proposed to ensure the availability of reliable electric service to meet customer electrical demand in the Electrical Needs Area because existing facilities would not meet forecasted, long-term electrical demand. Therefore, the Project would not induce growth but instead is designed to respond to existing growth and demand trends, and therefore would not be expected to substantially induce or exacerbate conversion of agricultural land. Impacts would be less than significant.”</p> <p>While SCE generally agrees with this statement, the first sentence in the paragraph is misleading with regards to the remaining information. The Project will be growth-accommodating, not growth-inducing, and as such, this statement misrepresents potential impacts resulting from this project.</p>	<p>Please revise as follows: “In addition, there would be no less-than-significant impact related to the conversion of Farmland from induced growth caused by the Project. The Project is proposed to ensure the availability of reliable electric service to meet customer electrical demand in the Electrical Needs Area because existing facilities would not meet forecasted, long-term electrical demand. Therefore, the Project would not induce growth but instead is designed to respond to existing growth and demand trends, and therefore would not be expected to substantially induce or exacerbate conversion of agricultural land. Impacts would be less than significant.”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
124.	Chapter 4.2	4.2-11	Regarding Mitigation Measure 4.2-3 , please add the suggested revision for clarification purposes.	<p>Please revise as follows: "Mitigation Measure 4.2-3: SCE and/or its contractors shall incorporate the following measures into project construction plans and specifications specific to lands designated as Farmland:</p> <ul style="list-style-type: none"> • Ensure that existing drainage systems at Project sites that are needed for farming activities function as necessary per coordination with the landowner, so that agricultural uses are not disrupted. • Coordinate with landowners to ensure that construction does not impact irrigation and/or other ancillary farming systems to a degree that farming practices cannot be maintained. • Maintain existing levels of water available to farmers via the current irrigation system including, but not be limited to, implementing re-routing and/or temporary irrigation systems. <p>In lieu of implementing the above requirements, SCE shall have the option of negotiating agreements with any affected landowner(s) that shall enable the landowner(s), to the extent practicable, to effect their own irrigation and/or drainage system changes in a manner consistent with the landowner's farming practices and plans."</p>
125.	Chapter 4.2	4.2-11	Under the heading Alternative 1: Phased Construction Alternative , as previously communicated to the CPUC, please clarify the construction duration would occur over a period of 24 months due to construction phasing.	<p>Please revise as follows: "Alternative 1 would cause the same acreage of temporary disturbance as the Project to Farmland due to site preparation associated with construction activities as the Project, but temporary impacts would occur over a longer period of time 22 <u>24</u> months due to the construction phasing schedule."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
126.	Chapter 4.2	4.2-12	<p>Under the heading Alternative 2: Relocated Substation Alternatives, it states, "However, because Alternative 2 would require 3 to 5 fewer wood poles and 0.54 fewer miles of new access roads, the total permanent disturbance of <i>Prime Farmland</i>, <i>Unique Farmland</i>, and <i>Farmland of Statewide Importance</i> would be slightly less than the Project."</p> <p>SCE calculated that for Alternative 2, 11th Street would require 0.17 fewer miles of rehabilitated access road, Reservoir Avenue would require 0.50 fewer miles of access road, but 0.50 miles of new access road would be needed on A Avenue.</p> <p>SCE's calculations do not support the DEIRs conclusion that there are 0.54 fewer miles of access road, therefore it is suggested that the data be reconfirmed to ensure its accuracy.</p>	
127.	Chapter 4.2	4.2-12	<p>Under the Alternative 2: Relocated Substation Alternative, please revise to reflect the length of subtransmission source line route for Alternative 2 would be 1,320 feet shorter than the Proposed Project.</p>	<p>Please revise as follows: "Alternative 2 would disturb less Farmland than the Project during both construction and operation. Construction of Alternative 2 would cause temporary disturbance to Farmland similar to the Project, but because the subtransmission source line routes would be shorter by approximately 2,900 <u>1,320</u> feet and Alternative 2 would require 3 to 5 fewer wood poles and 0.54 less mile of new access roads, the total temporary disturbance of <i>Prime Farmland</i>, <i>Farmland of Statewide Importance</i>, and <i>Unique Farmland</i> would be slightly less than the Project.</p> <p>Implementation of Mitigation Measures 4.2-1a and 4.2-1b would support the continued productive use of Farmland in the Project area once construction is complete. This impact would be less than significant with mitigation incorporated.</p> <p>The proposed Lakeview Substation would be constructed on Prime Farmland and, like the Project, would permanently disturb 5.4 acres of Prime Farmland. However, because the subtransmission source line routes would be shorter by approximately 2,900 <u>1,320</u> feet and Alternative 2..."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
128.	Chapter 4.3	4.3-4	<p>Under the heading Criteria Air Pollutants, ozone, oxides of nitrogen (NOx) carbon monoxide (CO), and PM10/2.5 are described as concerns within the Project Study Area. Following in Table 4.3-1 monitoring data for CO are not presented and/or is not described as unavailable. Additionally, Table 4.3-1 should present monitoring data for all available criteria pollutants. Although the other pollutants may not be “of concern within the area,” presenting the data supports the statement. Please revise to include other criteria pollutants in Table 4.3-1 as available.</p>	<p>Please revise as follows: In Table 4.3-1, include monitoring data for CO, or provide footnote that describes CO monitoring data are not available.</p>
129.	Chapter 4.3	4.3-6	<p>Under the heading Fiber-Optic Cable Routes, the text regarding the Fiber-Optic Cable Route 3 should be deleted for the reasons explained in SCE’s accompanying cover letter and should be replaced with information related to the new telecommunications work at Alessandro Substation.</p>	<p>Please revise as follows: The underground portion of Fiber-Optic Cable Route 3 would be within approximately 50 feet of the backyards of at least three residences along Swaps Street and would be within approximately 200 feet of a Riverside County Fire Department Moreno Beach Fire Station that is along Bay Avenue. The overhead portion of Fiber-Optic Cable Route 3 would be within approximately 500 feet of at least one residence along Alessandro Boulevard, approximately 50 to 100 feet of 28 residences along Broadhaca Avenue, and approximately 150 feet and 200 feet from a residential trailer park and a horse ranch along Davis Road, respectively. The Fiber-Optic Cable installation at Alessandro Substation would be within approximately 150 feet of the backyards of at least three residences along Rencher Court, within approximately 160 feet of the backyards of at least two residences along Josephine Court, within approximately 25 feet of the backyards of at least four residences along Kitching Street, and within approximately 840 feet of Armada Elementary school to the west.</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
130.	Chapter 4.3	4.3-6	Under the heading Nuevo Substation and Model Pole Top Transformer , please revise description to be consistent with Project Description references and SCE's PEA.	<p>Please revise heading as follows: Nuevo Substation and temporary Model Pole Top Transformer Substations</p> <p>Please revise as follows: "The Nuevo Substation is approximately 200 feet from a residence along Palm Avenue and the temporary Model Pole Top Transformer Substations..."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
131.	Chapter 4.3	4.3-7	<p>Under the heading Diesel Risk Reduction and Diesel Fuel Regulations, include additional information related to In-Use Off-Road and On-Road Diesel Regulation and its impacts to fleets.</p>	<p>Please revise as follows: California's Diesel Risk Reduction and Diesel Fuel Regulations Programs <u>Risk Reduction Plan</u></p> <p>As part of California's Diesel Risk Reduction Plan, CARB has passed numerous regulations to reduce diesel emissions from vehicles and equipment that are already in use. Combining these retrofit regulations with new engine standards for diesel-fueled vehicles and equipment, CARB intends to reduce DPM emissions by 85 percent from year 2000 levels by 2020.</p> <p><u>Diesel Fuels</u></p> <p>California Diesel Fuel Regulations (13 Cal. Code Regs. §§2281-2285; 17 Cal. Code Regs. §93114) provide standards for motor vehicle fuels and diesel fuel.</p> <p><u>In-Use Off-Road Diesel Vehicle Regulation</u></p> <p>CARB's In-Use Off-road Diesel Vehicle Regulation establishes various requirements for owners of off-road diesel vehicles, with engine ratings of 25 horsepower (HP) and greater, to reduce NOx and DPM. Requirements to date have included reporting fleet vehicles to the CARB; obtaining a CARB-issued equipment identification number for all diesel-fleet vehicles; and, developing and implementing a written idling policy restricting non-essential idling to less than 5-minutes. Emission performance requirements become effective January 2014, and establish fleet average targets for NOx emission reductions. Emission performance can be achieved through fleet turnover and use of newer model year equipment, as well as installation of certified retrofit equipment such as a particulate filter.</p> <p><u>On-Road Heavy Duty Diesel Vehicle Regulation</u></p> <p>CARB's On-road Heavy Duty Diesel Vehicles (In-Use) Regulation applies to diesel-fueled trucks and busses with a gross vehicle weight greater than 14,000 lbs. The regulation establishes a phase-in schedule for fleet owners and operators to reduce emissions of PM through fleet turnover and/or installation of retrofit equipment such as exhaust filters. The phase in schedule initiated January 1, 2012, and applies to fleets based on model year.</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
132.	Chapter 4.3	4.3-8	<p>In Table 4.3-2, footnotes should be included clarifying the 1-hr NAAQS for NOx and SO₂, and 24-hr standard for PM₁₀.</p>	<p>Please revise as follows: In the “Averaging Time” column for 1-hr NOx and 24-hr PM_{2.5}, add footnote 1. In Table 4.3-2, include: <u>1. Standard is based on the 98th percentile value, averaged over three years.</u> Please revise as follows: In the “Averaging Time” column for 1-hr SO₂, add footnote 2. In Table 4.3-2, include: <u>2. Standard is based on the 99th percentile value of 1-hr daily maximum concentration, averaged over three years.</u></p>
133.	Chapter 4.3	4.3-9	<p>Under the heading Regulation IV – Prohibitions, Rule 402 – Nuisance, additional language should be presented explaining the requirements related to odors. As currently stated, it is not clear that this rule is aimed at reducing and controlling odor impacts.</p>	<p>Please revise as follows: “This rule prohibits the discharge of air contaminants or other material, <u>including odorous material</u>, in quantities that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public.”</p>
134.	Chapter 4.3	4.3-14	<p>Under the heading Approach to Analysis, 3rd paragraph, emission factors utilized to calculate emissions were obtained from SCAQMD and Emfac2007. The CARB released new emission factor models in September 2011; analysis should present justification for not using the newer models and emission factors.</p>	<p>Please revise as follows: “The CARB released new mobile source emission factor modeling tools in September 2011. for the evaluation of tail-pipe emissions from on-road vehicles and off-road equipment. <u>The new models account for updated fleet inventories and regulatory changes. These models were not used in the evaluation based on timing of the analysis.</u>”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
135.	Chapter 4.3	4.3-14	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Conflict with or obstruct implementation of the applicable air quality plan, based on the emissions reductions achieved from additional water usage and reduced truck trips resulting from removal of Fiber-Optic Cable Route 3, and additional fiber-optic cable installation within and adjacent to Alessandro Substation, there would be no change in impact determination for this criteria.</p>	
136.	Chapter 4.3	4.3-15	<p>Under the heading Impact 4.3-1, 2nd paragraph, please clarify for consistency purposes that Model Pole Top is a temporary substation, as described in SCE's PEA.</p>	<p>Please revise as follows: "The maximum daily emissions that would be generated during construction of each of the Project components (i.e., proposed Lakeview Substation, distribution getaways, subtransmission source lines, and telecommunication system), as well as during demolition of the Nuevo Substation and <u>temporary Model Pole Top Substations</u>."</p> <p>"Demolition of the Nuevo Substation and <u>temporary Model Pole Top Substations</u> would occur."</p> <p>"...during demolition of the Nuevo Substation and <u>temporary Model Pole Top Substations</u>."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision												
137.	Chapter 4.3	4.3-15	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation, based on the removal of Fiber-Optic Cable Route 3, and additional fiber-optic cable installation within and adjacent to Alessandro Substation as well as other project specifications based on design (i.e. additional water usage), the following adjustments were made in the air quality calculations, and require changes to peak daily emissions presented in Table 4.3-6: increased water truck daily mileage for Substation grading (from 12 to 24 miles), based on the increased daily water use (see Table 8 in spreadsheets); changed the receptor distance for the LST analysis for the telecommunications construction to 25 meters to reflect the houses along Kitching street (see Table 5 in Appendix C); decreased the number of days for overhead telecommunications construction from 44 to 15 (see Table 37 in Appendix C); decreased the unpaved mileage for vehicles during overhead telecommunication construction from 17 mi. to 4 mi. (see Table 37 in Appendix C); increased the number of days for underground telecommunications construction from 6 days to 10 days; added 4 trips by a 4,000 gal. water truck to the overhead telecommunications construction (see Table 37 in Appendix C). There is no change to significance determination as a result of these revisions.</p>	<p>Please revise as follows:</p> <table border="1" data-bbox="565 142 873 766"> <thead> <tr> <th colspan="3" style="text-align: center;">Revised Table 4.3-6</th> </tr> <tr> <th style="text-align: center;">Project Component</th> <th style="text-align: center;">PM10 (lb/day)</th> <th style="text-align: center;">PM2.5 (lb/day)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Telecommunications Construction</td> <td style="text-align: center;">69.1 31.2</td> <td style="text-align: center;">8-7 5.0</td> </tr> <tr> <td style="text-align: center;">CONSTRUCTION MAXIMUM DAILY^b</td> <td style="text-align: center;">324.7 <u>288.55</u></td> <td style="text-align: center;">52.6 <u>48.98</u></td> </tr> </tbody> </table>	Revised Table 4.3-6			Project Component	PM10 (lb/day)	PM2.5 (lb/day)	Telecommunications Construction	69.1 31.2	8-7 5.0	CONSTRUCTION MAXIMUM DAILY^b	324.7 <u>288.55</u>	52.6 <u>48.98</u>
Revised Table 4.3-6																
Project Component	PM10 (lb/day)	PM2.5 (lb/day)														
Telecommunications Construction	69.1 31.2	8-7 5.0														
CONSTRUCTION MAXIMUM DAILY^b	324.7 <u>288.55</u>	52.6 <u>48.98</u>														
138.	Chapter 4.3	4.3-16	<p>Under the heading Table 4.3-6, 3rd paragraph, 3rd sentence describes that PM10 emission reductions have been factored in to the emissions presented in Table 4.3-6.</p> <p>Recommend presenting the control efficiency that has been applied, or reference the location in the document where this can be found.</p>	<p>Please revise as follows: "It should be noted that the PM₁₀ emission estimates presented in Table 4.3-6 factor in emission reductions that would be achieved by implemented BACMs, which are general in nature to offer flexibility in implementation. <u>PM₁₀ emission reductions range between 57, 60, and 90% based on limiting vehicle speed on unpaved roads and surfaces, watering during grading and bulldozing activities, and watering soil, respectively.</u>"</p>												

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
139.	Chapter 4.3	4.3-16	<p>In Table 4.3-6, the table does not present emissions calculations after mitigation has been implemented.</p>	<p>Please add a line in the table that presents the peak daily emissions as mitigated, accounting for the 20% and 45% reduction in NOx and PM10 achieved through implementation of Mitigation Measure 4.3-1a.</p>
140.	Chapter 4.3	4.3-16	<p>Under the heading Mitigation Measure 4.3-1a, please revise the mitigation measure to provide clarification on implementation.</p>	<p>“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 estimated unmitigated emissions, as presented in this DEIR. An Exhaust Emissions Control Plan, to achieve these reductions, shall be submitted to CPUC for review and approval 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 engines meeting USEPA Tier 3 standards (or better), and a recordkeeping protocol demonstrating compliance with USEPA Tier 3 standards (or better), low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as such become available. If compliant rental equipment cannot 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.”</p>
141.	Chapter 4.3	4.3-17	<p>Under the heading Significance after Mitigation, 1st paragraph, 2nd sentence includes an incorrect reference to BAAQMD, which should be changed to SCAQMD.</p>	<p>Please revise as follows: “As noted above, implementation of the BAAQMD fugitive dust BACMs</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
142.	Chapter 4.3	4.3-18	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors), the removal of Fiber-Optic Cable Route 3 and additional PM emission reductions achieved during unpaved roadway water would reduce NOx and PM10; however, emissions of NOx and PM10 would remain significant and unavoidable due to concentrated construction equipment activity and would still contribute to a cumulatively considerable significant increase, when compared with other projects. No change in significance determination would result from the construction, operation, and maintenance of underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation.</p>	
143.	Chapter 4.3	4.3-19	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) Expose sensitive receptors to substantial pollutant concentrations, construction, operation, and maintenance of underground fiber-optic cable and conduit installation would not result in a change in significance determination related to receptor exposure. Construction emissions, although decrease for PM10, would still result in a significant, localized impact.</p>	
144.	Chapter 4.3	4.3-20	<p>In Table 4.3-8, in the cell with Nuevo Substation Demolition, the allowable NOx emissions are listed as 201 lbs/day. The correct value is 161 lbs/day per SCAQMD LST lookup table (see Appendix C, Table 5)</p>	<p>Please revise as follows: Maximum Allowable Emissions (lbs/day)^b = 201 <u>161</u></p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
145.	Chapter 4.3	4.3-21	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) Create objectionable odors affecting a substantial number of people since construction activities associated with underground fiber-optic cable and conduit installation would be temporary and spatially dispersed, and would take place in a rural area, these activities would not affect a substantial number of people. Therefore, impacts from odors generated by construction within and adjacent to Alessandro Substation would be less than significant. No additional odorous impacts would result during operation or maintenance activities.</p>	
146.	Chapter 4.3	4.3-21	Under the heading 4.2.5 Alternatives , section heading should be corrected to 4.3.5.	Please revise heading as follows: " 4.2.5 4.3.5 Alternatives "
147.	Chapter 4.3	4.3-22	In Table 4.3-9 , recommend modifying table to be consistent with Table 4.3-10. This includes presentation of the "Highest Peak Daily" and "Percent Change Compared to Project".	
148.	Appendix C	C-3	In Revised Table 5 , units for column titled "Daily Onsite Emissions" should be revised from lb/lbs to lb/day.	Please revise units in Revised Table 5 as follows: lb/lbs day
149.	Appendix C	C-13	In Table Motor Vehicle Categories and Numbers , under Distribution Civil, the column "Basis for Number" for the dump truck should be corrected; calculation is based on 315 CY, but 450 CY is presented.	Please revise as follows: "Based on 315 CY (Table 3.1) over 9 days and 10 CY/truck: 450 315 / 9 / 10 = 3.5"
150.	Chapter 4.4	4.4-1	Under the heading Introduction , please add the 2011 survey report, (to be provided under separate cover) to the following bullet point: "- special-status plants (Bonterra, 2010b)"	Please incorporate a new reference.
151.	Chapter 4.4	4.4-2	Under the heading Regional , the reference in the text regarding the Lakeview-Valley-Moval 155 kV subtransmission line is incorrect and should be revised to reflect the proper name and voltage.	Please revise as follows: "Portions of SCE's existing Lakeview Valley-Moval 155- 115 kV ..."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
152.	Chapter 4.4	4.4-4	Under heading Table 4.4-1 , update the acreages under Proposed Fiber Optic Cable Route to reflect the removal of Fiber-Optic Cable Route 3. Specifically, remove 9.10 acres of Riversidean Sage Scrub. Please revise Table 4.4-1 accordingly.	
153.	Chapter 4.4	4.4-6	Under the heading Waters of the U.S. , the reference to Fiber-Optic Cable Route 2 is incorrect and should be revised to Fiber-Optic Cable Route 1.	Please revise as follows: "The San Jacinto River is spanned by each of the proposed subtransmission source line segments, the new alternative subtransmission source line alignment associated with Alternative 2, and by Fiber-Optic Cable Route 2 <u>1</u> , which would connect the proposed Lakeview Substation to the Bunker-Nelson fiber-optic cable." Please delete this section.
154.	Chapter 4.4	4.4-6	Regarding the section describing Riversidean Sage Scrub , per SCE's accompanying cover letter, please remove all references to Fiber Optic Cable Route 3 and please also remove this section as it relates to this route only.	
155.	Chapter 4.4	4.4-9	Regarding Table 4.4-2 , please remove the column Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter.	
156.	Chapter 4.4	4.4-14	Regarding Table 4.4-2 , the San Jacinto Valley crownscale, is misclassified in the table specifically for Subtransmission Line Segment 2.	Please revise as follows: " Present -Occurs in the alignment near the San Jacinto River - Absent. Suitable habitat."
157.	Chapter 4.4	4.4-17	Under the heading Riverside Fairy Shrimp , the text should describe the results of the surveys that were conducted for this species (BonTerra 2010f) and state that a habitat assessment made by a permitted fairy shrimp biologist identified no suitable habitat within project impact areas.	Please revise as follows: " The result of the 2010 Riverside Fairy Shrimp Habitat Assessment determined that there was no suitable habitat for this species within the footprint of the Proposed Project (BonTerra 2010f). Designated critical habitat for this species does not occur in the study area for the project or alternatives (USFWS 2001; 2004b). "

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
158.	Chapter 4.4	4.4-17 & 4.4-18	Under the heading Stephen's kangaroo rat , the text should describe the results of the surveys that were conducted for this species (BonTerra 2011, BonTerra, 2010d; SJM Biological Consultants, 2011) and reference the report's appendix figure depicting the location of detections and suitable habitat in relation to project features.	Please revise as follows: "Numerous occurrences are reported in the study area (CDFG, 2011) and this species was detected along the <u>Subtransmission Line Segment 1</u> during focused surveys for the Project (Bonterra, 2010d; 2011)
159.	Chapter 4.4	4.4-18	Under the heading Special Status Plants , regarding the San Jacinto River crownscale, it should be clarified that the species is not present on Subtransmission Source Line Segment 2.	Please revise as follows: This species is documented by CDFG in the San Jacinto River corridor within Subtransmission Source Line Segments 1 and 2 (CDFG, 2011; BonTerra, 2010b).
160.	Chapter 4.4	4.4-24	Under the heading Local , a discussion should be added regarding the Stephen's kangaroo rat habitat conservation plan, which is administered by the Riverside County Habitat Conservation Authority.	
161.	Chapter 4.4	4.4-24	Under the heading Local , it should be noted that this information is provided for informational purposes only and that the local land use regulations do not apply to the Project, per CPUC General Order 131-D.	Please revise as follows: "CPUC General Order No. 131-D explains that local land use regulations would not apply to the Project. However, <u>for information purpose</u> , CPUC staff considered local plans and policies to inform the significance determination related to the protection of biological resources in the study area."
162.	Chapter 4.4	4.4-25	Regarding Table 4.4-3 MSHCP Criteria Cells in the Project Area , please remove references to Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter.	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
163.	Chapter 4.4	4.4-27	Under the heading 4.4.3 Applicant Proposed Measures regarding APM-Bio-3; Stephen's Kangaroo Rat, please revise the APM to accurately reflect the habitat assessment work conducted for Stephen's kangaroo rat surveys for the Proposed Project.	Please revise as follows: "A habitat assessment for Stephens' kangaroo rat shall be conducted by a biologist qualified to conduct Stephen's kangaroo rat surveys along Segment 1, 2 and 3 and the Proposed Telecommunications Route for the entire Proposed Project. Protocol level trapping was conducted along Subtransmission Segments One and Two. Stephens' kangaroo rat was detected along Segment One. The proposed project is in a Stephens' kangaroo rat fee area; therefore, to mitigate for potential impacts to this species, SCE will pay a fee in coordination with the Regional Habitat Conservation Authority. If no potential occupied habitat is found during this assessment, then no further action is necessary. If potential for occupied habitat is found, protocol trapping surveys shall be conducted. The Proposed Telecommunications Route is within a Stephens' kangaroo rat fee area; therefore, if suitable habitat for this species is found, a fee shall be paid in lieu of further surveys (County of Riverside, 1996)."
164.	Chapter 4.4	4.4-28 to 4.4-29	Under the heading 4.4.3 Applicant Proposed Measures , please make the previously requested revisions (Executive Summary) to APM-BIO-6 and APM-BIO-7.	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
165.	Chapter 4.4	4.4-28	<p>Under the heading 4.4.4 Impacts and Mitigation Measures, regarding the impact analysis in this section of the document the following needs to be considered:</p> <p>This section needs to apply the criteria described on page 4.4-26 to assess the magnitude of the impact on biological resources, and the uniqueness and sensitivity of the potentially impacted resources. At a minimum the DEIR needs to provide an acreage table indicating the extent of impacts to the habitat types within the project area. The PEA includes such acreage tables (Tables 4.4-3 – 4.4-9) and these tables should be summarized in the DEIR. The PEA indicates that with the exception of 0.2 acres of impacts to alkali grassland, all impacts would be occurring to non-sensitive habitat types (ruderal, disturbed, agricultural, ornamental). The DEIR needs to assess the impacts to the alkali grassland, and also needs to emphasize the low impact nature of this project and the fact that direct construction impacts will be occurring almost entirely in habitats that do not support sensitive biological resources. The indirect construction impacts (e.g., effects of construction dust, sedimentation, changes in hydrology, introduction of weeds) on special-status species also needs to be discussed. Based on the relatively minor impacts expected to result from Project construction, these indirect impacts are likely to be less than significant, but this conclusion needs to be supported in the discussion.</p>	<p>Please revise impact analysis where appropriate per the guidance in the comment column.</p>
166.	Chapter 4.4	4.4-29	<p>Regarding the analysis and mitigation for Impact 4.4-1, as noted in the SCE accompanying cover letter, Fiber Optic Cable Route 3 is no longer applicable to the project; therefore, please delete Mitigation Measure 4.4-1 and all references to this route from this impact analysis.</p> <p>Because Subtransmission Line Segment 1 will potentially impact the San Jacinto Valley crownscale, language should be included to reflect the fact that if impacts cannot be avoided SCE would seek inclusion in the MSHCP to mitigate for any impacts to this species along Subtransmission Line Segment 1.</p>	<p>Please remove Mitigation Measure 4.4-1.</p> <p>Please revise as follows: “SCE would avoid known special-status plant populations through general plant protection measures (APM-BIO-6), and avoidance of San Jacinto Valley crownscale populations (APM-BIO-7); however, if avoidance of these species is not possible, as explained in the applicable APMs, SCE would seek inclusion in the MSHCP, therefore, impacts to critical habitat to are less than significant.”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
167.	Chapter 4.4	4.4-29	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFG or USFWS (including List 1A, 1B, 2 and 3 plant species of the CNPS Inventory), additional analysis presented based on removal of Fiber-Optic Cable Route 3 and addition of fiber-optic cable installation within and adjacent to Alessandro Substation.</p>	<p>Please revise as follows: "<u>Habitat for the federal and/or state-listed wildlife species identified in Table 4.4-3 does not occur in the study area. Numerous non-listed special-status wildlife species may be encountered in portions of the Project area due to the presence of suitable habitat and known or potential species presence. These species include: orangefthroat whiptail, coastal whiptail, red-diamond rattlesnake, San Bernardino ringneck snake, coast horned lizard, western spadefoot, tricolored blackbird, burrowing owl, loggerhead shrike, northwestern San Diego pocket mouse, southern grasshopper mouse, Los Angeles pocket mouse, American badger, and special-status bats.</u></p> <p><u>SCE would conduct preconstruction surveys for nesting birds and raptors, and implement avoidance requirements for active nests to reduce the potential for impacts to loggerhead shrike, burrowing owl and other birds (APM-BIO-01).</u></p> <p><u>Project impacts on habitats with sparse vegetation and primarily sandy soils, as found along the Riverside County Flood Control District (RCFCD) channel and within and adjacent to Alessandro Substation, would be minimized to the maximum extent practicable through the implementation of APM-BIO-02, which would reduce potential impacts to orangefthroat whiptail, coastal whiptail, coast horned lizard, and western spadefoot.</u></p> <p><u>Project activities in cultivated residential habitats with sandy to loamy soils, north of JFK Drive and west of Kitching Street, would impact potential habitat for the red-diamond rattlesnake, San Bernardino ringneck snake, northwestern San Diego pocket mouse, southern grasshopper mouse, Los Angeles pocket mouse, and American badger.</u></p> <p><u>The implementation of APM-BIO-02 would reduce potential impacts to these special-status wildlife species; therefore, this impact would be less than significant."</u></p>
168.	Chapter 4.4	4.4-30	<p>Under the heading Impact 4.4-1 (construction), the discussion states the thread-leaved brodiaea occurs on both Subtransmission Source Segments 1 and 2. However, Table 4.4-2 states it is absent and there is no suitable habitat on Subtransmission Source Line Segment 2.</p>	<p>Please revise as follows: "Designated critical habitat for thread-leaved brodiaea could occur on the Subtransmission Source Line Segments 1 and 2."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
169.	Chapter 4.4	4.4-30	Under the heading Impact 4.4-2 , it is explained that SKR was found on Fiber-Optic Cable Route 2 and 3 but Table 4.4.2 states SKR is absent on Route 2 but is present on Fiber Optic Routes 1 and 3. Additionally, please remove references to Fiber Optic Route 3 for the reasons described in SCE's accompanying letter.	Please revise as follows: "...Fiber Optic Route 2 <u>1 and 3</u> ."
170.	Chapter 4.4	4.4-30	Under the heading Impact 4.4-2 , the text references the fact that there is potential habitat along Subtransmission Line Segments 1 and 2 but does not reference the protocol level surveys that identified the presence of this species along Subtransmission Line Segment 1.	Please revise as follows: "If potential habitat for the Stephens' kangaroo rat were to be identified, SCE would perform protocol-level trapping surveys. SCE performed protocol-level trapping surveys for the Stephens' kangaroo rat and it was determined that there is presence of the species along Subtransmission Line Segment 1 and Fiber Optic Cable Route 1."
171.	Chapter 4.4	4.4-30	Under the heading Impact 4.4-2 , the following sentence should be clarified. "All the fiber-optic cable routes are within a Stephens' kangaroo rat fee area; therefore, if suitable habitat for this species were found, a fee would be paid to the County of Riverside in lieu of performing additional surveys."	Please revise as follows: " All the fiber-optic cable routes <u>The Project</u> is <u>is</u> are within a Stephens' kangaroo rat fee area; therefore, if <u>the</u> species is detected , <u>suitable habitat for this species were found</u> , a fee would be paid to the County of Riverside in lieu of performing additional surveys."
172.	Chapter 4.4	4.4-32	Under the heading Impact 4.4-4 , regarding Mitigation Measure 4.4-4 the following bullet point is not accurate and should be removed: "Shield wires to minimize the effects from bird collisions" A "shield wire" or "static wire" is a wire found on subtransmission and transmission lines. The primary function is for lightning protection. The intent of the MM is likely in regards to hanging flight diverters on the subtransmission line to avoid avian collisions. If this is the case, the proposed project site has a low likelihood of avian collision. Flight diverters are typically hung in areas such as riparian zones and migratory fly-ways where collision risk has a higher potential. It is not within SCE's design standards to hang flight diverters on every new subtransmission line.	Please remove the fourth bullet point from Mitigation Measure 4.4-4.

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
173.	Chapter 4.4	4.4-33	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Have a substantial adverse impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFG or USFWS additional analysis presented based on removal of Fiber-Optic Cable Route 3 and addition of fiber-optic cable installation within and adjacent to Alessandro Substation.</p>	<p>Please revise as follows: “Project construction activities, such as excavation, preparation of temporary work areas, pull and tension sites, and boring activities; operation of heavy equipment; and installation of vaults, could disturb nesting birds and cause nest site abandonment and/or reproductive failure through an increase in noise, human presence, and/or removal of habitat. Special-status birds that may nest in the Project area include burrowing owl and loggerhead shrike among other bird species, though the protective provisions of the MBTA also apply to many common bird species.</p> <p>Indirect impacts from human disturbances and construction noise could cause nest abandonment, death of young, or loss of reproductive potential at active nests located near Project sites. SCE would conduct preconstruction surveys for nesting birds and raptors, and implement avoidance requirements for active nests to reduce the potential for impacts to nesting birds (AFM-BIO-01); therefore, this impact would be less than significant.”</p>
174.	Chapter 4.4	4.4-33	<p>Under the heading c) Effect on federally protected wetlands..., it is explained that Fiber Optic Cable Route 2 crosses the San Jacinto River. However, Route 1 crosses the San Jacinto River as shown in DEIR Figures 2-1, 2-2, and 3-1.</p>	<p>Please revise as follows: “Portions of the San Jacinto River would be spanned by Subtransmission Source Line Segments 1 and 2, and Fiber Optic Cable Route 2.”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
175.	Chapter 4.4	4.4-33	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) Interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites additional analysis presented based on removal of Fiber-Optic Cable Route 3 and addition of fiber-optic cable installation within and adjacent to Alessandro Substation</p>	<p>Please revise as follows: "If adequate avoidance cannot be established, SCE would consider enrollment in the MSHCP as a Participating Special Entity for this Project or would coordinate with the USFWS and the CDFG for further guidance as appropriate.</p> <p>The underground fiber-optic cable and conduit installation proposed within and adjacent to Alessandro Substation is located within an urbanized area with no large areas of open space adjacent to the study area. A possible wildlife movement corridor in this area is the RCFCD channel. Most wildlife movement would occur at night and would not be affected by short-term construction or long-term operation. Additionally, wildlife in the area is likely acclimated to noise and human activity due to the extensive urbanization and constrained nature of this flood control channel.</p> <p>Proposed activities at and around the Alessandro Substation would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. There are no native wildlife nursery sites within the Alessandro Substation work area. Therefore, any construction-related impacts would be short term, and less than significant."</p>
176.	Chapter 4.4	4.4-33	<p>Regarding the analysis for Impact 4.4-5, please delete this entire discussion as it pertains to Fiber Optic Cable Route 3 which is no longer applicable for the reasons described in SCE's accompanying cover letter.</p>	
177.	Chapter 4.4	4.4-33	<p>Under the heading Impact 4.4-6, as previously explained, Fiber Optic Cable Route 1 crosses the San Jacinto River.</p>	<p>Please revise to: "As identified in the PEA (SCE, 2010, pg. 4.4-68), the alignments for Subtransmission Source Line Segments 1 and 2, and Fiber-Optic Cable Route 1_2 traverse the San Jacinto River."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
178.	Chapter 4.4	4.4-34	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance additional analysis presented based on removal of Fiber-Optic Cable Route 3 and addition of fiber-optic cable installation within and adjacent to Alessandro Substation</p>	<p>Please revise as follows: Project construction, operation and maintenance would not conflict with any local policies or ordinances protecting biological resources. Furthermore, the proposed Lakeview Substation site and work area within and adjacent to Alessandro Substation does not contain any native trees; therefore, construction, operation and maintenance of the proposed Lakeview Substation and underground work within and adjacent to Alessandro Substation would result in no impact under this criterion. There are no applicable tree preservation policies or other ordinances protecting biological resources for the Proposed Subtransmission Source Line Routes or Proposed Fiber-Optic Cable Routes (No Impact).</p>
179.	Chapter 4.4	4.4-34	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan, there is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that would be applicable to this Project (No Impact, Class IV).</p>	
180.	Chapter 4.4	4.4-35	<p>Under the heading Impact 4.4-7, the text explains that SCE has not determined whether it would participate in the MSHCP. Based on 2011 survey results, SCE has determined that impacts to Los Angeles pocket mouse, Coulter's goldfields, and San Jacinto Valley crownscale are likely unavoidable and would mitigate by participating in the MSHCP.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
181.	Chapter 4.4	4.4-36	Under the heading Alternative 2: Relocated Substation Alternative , the text references the relocated substation site would be .5 miles from the project site but the distance between Reservoir and 10 th Street to A Avenue and 10 th Street is only 0.25 mile and the substation will be located within half that distance.	Please revise as follows: "Alternative 2 would change the location of the substation to approximately 0.5 <u>0.125</u> mile northwest of the Project's proposed substation location."
182.	Chapter 4.5	4.5-2	Under the heading Cultural Resources , the text explains the setting related to Fiber Optic Cable Route 3, for reasons described in SCE's accompanying cover letter the section should be revised.	Please revise as follows: "The Project area is located within a wide northeast-southwest trending branch of Perris valley, within an alluvial plain formed by the San Jacinto River. The San Jacinto River has been realigned and channeled in modern times. The proposed fiber optic cable line runs along the base of the Bernaseeni Hills and Mount Russell, ending in Moreno Valley. Elevation ranges from 1,410 to 1,630 feet above mean sea level. Soil in the area consists of decomposed granitic silt, corals sand, and gravel. Hill slopes in the Bernaseeni Hills are characterized by granite bedrock outcrops. Originally, vegetation within the Project area would have consisted of grasslands and coastal sage scrub; however, this has been replaced by non-native grass, weeds, and agricultural fields (Cotterman and Mason, 2010)."
183.	Chapter 4.5	4.5-4	Under the heading Ethnographic Setting , the Project area is stated to be located near the boundary between the territories of the Luiseño and the Cahuilla. The PEA indicates the Project area is in the territory occupied by the Serrano (PEA p. 4.5-3). DEIR text should be revised to include mention of the Serrano.	Please revise "At the time of the Spanish contact, the Project area was located near the boundary between the territories of the Luiseño, and the Cahuilla, and the Serrano. " Please revise Ethnographic Setting section to include background text for the Serrano from the PEA pp. 4.5-3-4.5-4

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
184.	Chapter 4.5	4.5-7	<p>Under the heading Archival Research, provide footnote after discussion of records review to clarify that the evaluation did not cover Alessandro Substation construction work area.</p> <p>Alessandro Substation work is proposed to occur within the existing substation footprint and approximately 1,000 feet within an existing trench and roadway; based on level of previous disturbance, a records review is not warranted to evaluate cultural resources within and around work area within and adjacent to Alessandro Substation.</p>	<p>Please revise as follows: "A records search was completed at the Eastern Information Center for the Project and alternatives and a 0.5-mile radius¹."</p> <p>¹ <u>Underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation is proposed to occur within previously disturbed areas of developed land and roadways which have been subjected to extensive grading. Based on previous disturbance and the proposed trench depth, identification of a resource retaining sufficient integrity to qualify for the National, California, or local Register of Historic Places is unlikely. Therefore, a records review is not warranted to evaluate cultural resources within and around work area within and adjacent to Alessandro Substation.</u></p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
185.	Chapter 4.5	4.5-7 to 4.5-8	Under the heading Cultural Resources , please remove all references to Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter.	<p>Please revise as follows: "For convenience purposes, the records search consisted of two areas: 1) the proposed Lakeview Substation site, subtransmission source line segments, and Fiber Optic Cable Routes 1 and 2; and 2) Fiber Optic Cable Route 3."</p> <p>"Twenty-eight cultural resources investigations have been conducted within 0.5 mile of Fiber Optic Cable Route 3, of which eight covered portions of the Project area."</p> <p>"An additional 67 cultural resources have been recorded within 0.5 mile of Fiber Optic Cable Route 3, including 57 prehistoric archaeological sites, 2 prehistoric isolated artifacts, 2 historic era archaeological sites, 1 historic era irrigation ditch, 1 historic era eastern, 1 historic era building, 1 historic era human burial, and 2 multi-component archaeological sites. Fifty one of the prehistoric sites and the prehistoric components of both of the multi-component sites consist of or include bedrock milling features."</p> <p>"Four of the previously recorded resources, although not located within the Project area, were recorded within 100 feet of the Fiber Optic Cable Route 3. These resources, P-33-00525, P-33-00526, P-33-00608, and P-33-02951, are all prehistoric archaeological sites consisting of bedrock milling features."</p>
186.	Chapter 4.5	4.5-8	Under the heading Native American Contact , states that "No responses were received from any of the Native American contacts recommended by the NAHC as of the filing of SCE's application for a PTC." PEA states one response was received from the Cahuilla Band of Indians (PEA p. 4.5-7). Mention of response should be included in the DEIR.	<p>Please revise as follows: "<u>One response from the Cahuilla Band of Indians was received via email on April 6, 2010. The Cahuilla Band of Indians expressed interest in the project area due to the project location as being within the traditional use of the tribe. However, no traditional cultural properties or sacred lands were identified by the Cahuilla Band of Indians. No other responses were received by the remaining tribes consulted for the project.</u>"</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
187.	Chapter 4.5	4.5-8	Under the heading Archaeological Survey , please delete this discussion as it pertains to Fiber Optic Cable Route 3 which is no longer applicable for the reasons described in SCE's accompanying cover letter.	Please revise as follows: " An additional seven archaeological resources (P 33-00525, P 33-00526, P 33-00608, P 33-02951, CWA63-4, CWA63-5, and CWA63-6); four previously recorded and three newly recorded, are located outside of, but adjacent to (within 100 feet of), the Project area. These adjacent resources consist of four prehistoric archaeological resources and three historic-period agriculture-related archaeological resources. "

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
188.	Chapter 4.5	4.5-10	Under the heading Cultural Resources Located Adjacent to the project area , the following resources are located along Fiber Optic Cable Route 3 and for the reasons described in SCE's accompanying cover letter, the text should be deleted	<p>Please revise as follows: "The following seven archaeological resources and three built historic resources are located outside of, but within 100 feet of, the Project area. They have not been evaluated for significance under the National Register or California Register of Historical Resources. P-33-00525: This prehistoric archaeological resource is located approximately 65 feet west of the fiber optic cable route. The resource consists of three bedrock milling slicks and one bedrock mortar. The site was originally recorded in 1972 and was relocated in 2010. P-33-00526: This prehistoric archaeological resource is located approximately 65 feet northwest of the fiber optic cable route. The resource consists of a single bedrock milling slick. The site was originally recorded in 1972 and was relocated in 2010. P-33-02951: This prehistoric archaeological resource is located approximately 16 feet southwest of the fiber optic cable route. The resource consists of a single bedrock milling slick. The site was originally recorded in 1983 and was relocated in 2010. P-33-00608: This prehistoric archaeological resource is located approximately 100 feet southwest of the fiber optic cable route. The resource consists of two bedrock milling slicks on separate granite bedrock outcroppings. The site was originally recorded in 1973 and was relocated in 2010. CWA63-4: This newly recorded historic period archaeological resource consists of a partially collapsed structure with a concrete foundation and lumber walls covered in corrugated galvanized steel. The structure may have been a well house. The resource is located about 25 feet southeast of the fiber optic cable route. CWA63-5: This newly recorded historic period archaeological resource consists of a 6 foot high, 60 foot diameter dirt mound surrounding the base of a cylindrical water reservoir. The reservoir is composed of granite boulders and cobbles bound by mortar and lined with cement plaster. Several historic era artifacts were recorded in the reservoir, including a cylindrical "Prince Albert" tobacco can, a rectangular can, an aluminum top beverage can with a pull tab opening, and several lumber fragments. The resource is located about 65 feet east of the fiber optic cable route. CWA63-6: This newly recorded historic period archaeological resource consists of the remains of an irrigation pumping feature and a capped well. The pumping feature consists of a concrete slab with protruding steel pipes, but no pumping equipment, and is flanked by two concrete standpipes. The capped well is a steel pipe set in concrete and projecting to a height of 42 inches above the ground surface. The top of the pipe is capped with a flat steel plate. The resource is located about 30 feet west of the fiber optic cable route."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
189.	Chapter 4.5	4.5-19	Under the heading Impact 4.5-1 , the following resources are located along Fiber Optic Cable Route 3 and for the reasons described in SCE's accompanying cover letter, the text should be deleted.	Please revise as follows: " An additional seven archaeological resources (P-33-00525, P-33-00526, P-33-00608, P-33-02951, CWA63-4, CWA63-5, and CWA63-6) are located outside of, but adjacent to (within 100 feet of), the Project area. These adjacent resources consist of four prehistoric archaeological resources and three historic-period agriculture-related archaeological resources. "
190.	Chapter 4.5	4.5-19	Under the heading Impact 4.5-1 , please clarify the existing poles for Fiber Optic Route 2 would be distribution, and not transmission.	Please revise as follows: "These houses would not be directly impacted by the Project. Fiber optic cable would be strung along existing transmission-line <u>distribution</u> poles and once installed, would have no additional visual impact; therefore, the setting of the houses would not be changed by the Project and no indirect impacts would occur."
191.	Chapter 4.5	4.5-19	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a.) A substantial adverse change in the significance of a historical resource that is either listed or eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or a local register of historic resources, the new telecommunication work within and adjacent to Alessandro Substation is located within previously disturbed areas of developed land and roadways which have been subjected to extensive grading. Based on previous disturbance and the proposed trench depth, identification of a resource retaining sufficient integrity to qualify for the National, California, or local Register of Historic Places is unlikely. Therefore, underground installation of fiber-optic cable and conduit within and adjacent to Alessandro Substation would not impact culturally significant historic resources.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
192.	Chapter 4.5	4.5-20	Under the heading Impact 4.5-1 , the following resources are located along Fiber Optic Cable Route 3 and for the reasons described in SCE's accompanying cover letter, the text should be deleted.	Please revise as follows: "The seven archaeological resources (P-33-00525, P-33-00526, P-33-00608, P-33-02951, CWA63-4, CWA63-5, and CWA63-6) that are located adjacent to the Project area were not evaluated for significance. The sites are located adjacent to the proposed fiber optic cable route and are located between 5 and 100 feet from the Project area. Installation of fiber optic cable above-ground on the existing subtransmission line would be restricted to existing SCE access roads and thus would not impact these sites. However, the set-up and use of pull and tension sites, which generally measure approximately 50 by 100 feet, could impact these sites. No pull and tension sites are currently proposed near these resources. However, final pulling sites would be determined during final engineering. The final location of pull and tension sites should avoid all impacts to these resources. To avoid significant impacts to resources P-33-00525, P-33-00526, P-33-00608, P-33-02951, CWA63-4, CWA63-5, and CWA63-6, Mitigation Measures 4.5-1 through 4.5-3 should be implemented. Mitigation Measure 4.5-1 would require the retention of a qualified archaeologist. Mitigation Measure 4.5-2 would require that the resources listed above be avoided during Project-related construction. Mitigation Measure 4.5-3 would require full time archaeological monitoring of Project construction activity within 50 feet of the sites. With these mitigation measures, impacts to historical resources would be less than significant."
193.	Chapter 4.5	4.5-20 through 4.5-21	Under the heading Impact 4.5-1 , please note that the five resources (P-33-05130, P-33-09030, CWA63-1, CWA63-2, and CWA63-3) have been found ineligible for the CRHP and NRRP and therefore the proposed project would not result in impacts to significant resources. Since there are no impacts, Mitigation Measures 4.5-1a and 4.5-1b are not needed.	Please remove Mitigation Measure 4.5-1a and 4.5-1b.

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
194.	Chapter 4.5	4.5-21	<p>Regarding the analysis for Impact 4.5-2, the analysis presented in this section is related to the scope of work associated with Fiber Optic Cable Route 3, for the reasons described in SCE's accompanying cover letter this section should be removed and therefore the mitigation measures would not be warranted.</p>	<p>Please remove the discussion related to Impact 4.5-2 and Mitigation Measure 4.5-2a and Mitigation Measure 4.5-2b.</p>
195.	Chapter 4.5	4.5-21	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows: Under CEQA criteria b.) A substantial adverse change in the significance of a unique archaeological resource, the new telecommunication work within and adjacent to Alessandro Substation would not result in a substantial adverse change to a unique archaeological resource, as the ground disturbance will be limited to previously disturbed areas in which archaeological resources are not likely to be identified.</p>	
196.	Chapter 4.5	4.5-22	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows: Under the CEQA criteria c.) Disturbance or destruction of a unique paleontological resource or site or unique geologic feature, the new telecommunication work within and adjacent to Alessandro Substation would not result in an effect to a unique paleontological or geological resource, as the ground disturbance will be limited to previously disturbed areas in which these resources are not likely to be identified.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
197.	Chapter 4.5	4.5-24	<p>Regarding Mitigation Measure 4.5-3, the information provided in bullet point, would require the construction foreperson and field supervisor be trained to recognize fossil materials, however a paleontologist is truly the only personnel who should be tasked with such a responsibility. Identification of fossils should not be the responsibility of construction crews and would require training above and beyond what is necessary to mitigate the potential impact as general WEAP training in conjunction with bullet point 4 would sufficiently address the potential impact.</p>	<p>Please revise as follows:</p> <p>Mitigation Measure 4.5-3: Prior to the initiation of any site preparation or start of construction, SCE and/or its contractors shall contract with a qualified professional paleontologist or a California Registered Professional Geologist (California RPG) with appropriate paleontological expertise, as defined by the Society of Vertebrate Paleontology's Conformable Impact Mitigation Guidelines Committee (SVP 1995 Guidelines) to develop carry-out a paleontological resources training program <u>WEAP training</u> for construction workers and implement a paleontological monitoring program. 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> <p><i>Paleontological resources training.</i> All construction forepersons and field supervisors shall be trained in the recognition of <u>regarding</u> the potential to <u>encounter</u> fossil materials prior to the initiation of any site preparation or start of construction. Training on paleontological resources shall also be provided to all other construction workers, but may include videotape of the initial training and/or the use of written materials rather than in-person training by the qualified paleontologist. In addition to fossil recognition, the training shall convey procedures to follow if potential fossil materials are encountered by construction crews in the course of earthwork, excavation, or grading, as described below."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
198.	Chapter 4.5	4.5-25	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under the CEQA criteria d.) Disturbance of any human remains, including those interred outside of formal cemeteries, the new telecommunication work within and adjacent to Alessandro Substation would not likely result in the disturbance of human remains, as the ground disturbance will be limited to previously disturbed areas.</p>	
199.	Chapter 4.5	4.5-26	<p>Under the heading Alternative 1: Phased Construction Alternative, the construction period would be extended by 12 months not 10 months. Please revise to reflect the accurate construction duration.</p>	<p>Please revise as follows: "Alternative 1 would extend the period of construction by <u>12</u> months, but would not change the location and type of facilities to be constructed."</p>
200.	Chapter 4.5	4.5-26	<p>Under the heading Alternative 2: Relocated Substation Alternative, the text explains that the Proposed Lakeview Substation would be 0.25 mile to the northwest, however the distance should be changed to .125 mile.</p>	<p>Please revise as follows: "Alternative 2 would relocate the proposed Lakeview Station site approximately <u>0.25</u> 0.125 mile to the northwest, closer to the San Jacinto corridor, resulting in a shorter subtransmission source line compared to the Project."</p>
201.	Chapter 4.6	4.6-1	<p>Under the heading Electricity, for clarification, please make the revisions as noted to make this section consistent with earlier section of the document.</p>	<p>Please revise as follows: "There are currently 1,800 metered customers in the portion of unincorporated western Riverside County that would be served by the Project. These customers compose the Electrical Needs Area. The Electrical Needs Area consists of that part of unincorporated western Riverside County (including the developing areas of Nuevo and Lakeview) now served by SCE's 33/12 kV Nuevo Substation and Model Pole Top, which provide electrical service to approximately 1,800 metered customers"</p>
202.	Chapter 4.6	4.6-2	<p>Under the heading Electricity, for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE's PEA.</p>	<p>Please revise as follows: "Currently, SCE serves the Electrical Needs Area through two 33/12kv Substations- the Nuevo Substation and the temporary Model Pole Top transformer Substation. In 2007, SCE projected that the capacity at Nuevo Substation would be exceeded in 2009, and the temporary Model Pole Top transformer Substation was constructed to provide an interim means to serve the electrical demand in the area until a new substation could be constructed..."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
203.	Chapter 4.6	4.6-3	<p>Under the heading Electricity, the paragraph states "SCE currently provides electricity to the Project area via overhead and underground transmission and distribution lines." Please revise to clarify that no transmission facilities currently provide electricity to the Project area.</p>	<p>Please revise as follows: "SCE currently provides electricity to the Project area via overhead and underground transmission and distribution lines."</p>
204.	Chapter 4.6	4.6-6	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Evaluate the Project's energy requirements by amount and fuel type for each stage of the Project including construction, operation and maintenance, because construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not interrupt existing local SCE service and because construction-related energy demands are not expected to have a significant adverse effect on energy resources, energy consumption by construction activities would be less than significant. Additionally, implementation of Mitigation Measure 4.3-1b, which is described and analyzed in Section 4.3, <i>Air Quality</i>, would further ensure that fuel energy consumed in the construction phase would not be wasted through unnecessary idling or through the operation of poorly maintained equipment.</p>	
205.	Chapter 4.6	4.6-7	<p>Under the heading Impact 4.6-1 and subsequent sections, as previously mentioned, for consistency purposes please clarify Model Pole Top is a temporary substation, as stated in SCE's PEA.</p>	<p>Please revise as follows: "Energy consumption required for operation and maintenance of the Project would be minimal and slightly less than the energy consumption required for the existing Nuevo Substation and <u>temporary Model Pole Top substations</u>."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
206.	Chapter 4.6	4.6-7, 4.6-9	<p>Under the heading b) Evaluate the effects of the Project on local and regional energy supplies and on requirements for additional capacity., it is stated that "...the Project would contribute approximately 74 percent more power to the grid than the existing Nuevo Substation and Model Pole Top, meeting both existing and projected local energy needs..."</p> <p>The reference to 74 percent more power to the grid is inaccurate and should be revised to approximately 4 times the capacity to the area as needed from the grid.</p>	<p>Page 4.6-7 Please revise as follows: "The Project would be located within SCE's service territory and would have energy delivered from ##### energy to the regional power grid. By replacing an older, less efficient substation that has reached its capacity limit with no further ability for capacity expansion with a new, more efficient one that would have the capability for accommodating the current electrical needs of the area as well as the electrical needs of the foreseeable future, the Project would ##### increase the ability to deliver approximately 4 times the capacity to the area as needed 74 percent more power to from the grid than the existing Nuevo Substation and Model Pole Top, meeting both existing and projected local energy needs. Consequently, the Project would have a beneficial impact on local and regional energy supplies because it would ensure that current energy needs are met and that there is capacity to meet projected future energy needs in the Electrical Needs Area. No adverse impact on local or regional energy supplies or capacity would result (No Impact)."</p> <p>Page 4.6-9 Please revise as follows: "As discussed above, the Project would increase the capacity efficiency of the existing site's existing contribution of energy delivered from to the grid by approximately 4 times the capacity of that of 74 percent above the existing Nuevo Substation and Model Pole Top while also increasing the efficiency of the energy delivered. Consequently, the Project would not result in adverse impacts on energy resources (No Impact)."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
207.	Chapter 4.6	4.6-7	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Evaluate the effects of the Project on local and regional energy supplies and on requirements for additional capacity because construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation are not expected to have a significant adverse effect on energy resources, energy consumption by construction activities would be less than significant.</p>	
208.	Chapter 4.6	4.6-8	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Evaluate the effects of the Project on peak and base period demands for electricity and other forms of energy construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation are not expected to have a significant adverse effect on energy resources, energy consumption by construction activities would be less than significant.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
209.	Chapter 4.6	4.6-8	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) Evaluate the degree to which the Project complies with existing energy standards construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would be short-term and would not result in the permanent, increased use of non-renewable energy resources.</p>	
210.	Chapter 4.6	4.6-8	<p>Under the heading c) Evaluate the effects of the Project on peak and base period demands for electricity and other forms of energy, for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE's PEA.</p>	<p>Please revise as follows: "The Lakeview Substation would be unattended and fewer trips anticipated during than are currently occurring for the Nuevo Substation and temporary Model Pole Top Substations."</p>
211.	Chapter 4.6	4.6-9	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) Evaluate the effects of the Project on energy resources construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would be short-term and would not result in the permanent, increased use of energy resources. No additional impacts would result from operation and maintenance.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
212.	Chapter 4.6	4.6-9	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria f) Evaluate the Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives the short-term duration of construction activities, and limited operational and maintenance activities, associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation and small construction workforce (6 workers) would result in less than significant impacts related to transportation energy use.</p>	
213.	Chapter 4.6	4.6-9	<p>Under the heading e) Evaluate the effects of the Project on energy resources, for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE's PEA.</p>	<p>Please revise as follows: "As discussed above, the Project would increase the efficiency of the site's existing contribution of energy to the grid by approximately 74 percent above the existing Nuevo Substation and temporary Model Pole Top Substations."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
214.	Chapter 4.7	4.7-1	Under the heading 4.7.1 Setting , please make the suggested revision to clarify the setting of the project area.	<p>Please revise as follows: “The Project area is located in the north-central portion of the greater Peninsular Ranges Geomorphic Province. The Peninsular Ranges Geomorphic Province is characterized by a series of north-west trending mountain ranges separated by north-west trending valleys and faults. The valleys are alluvium-filled basins of Cenozoic sedimentary and the mountains ranges are composed of Mesozoic granitic rocks (SCE, 2010). The structural geology of the area is dominated by faults. Major <u>active</u> faults in the province are the San Jacinto and the Eisinore faults. The study area relevant to geology and soils includes the proposed Lakeview Substation site, the subtransmission source line route, and the telecommunications system where new facilities are proposed. The Nuevo Substation and Model Pole Top would be removed as part of the Project and would no longer be subject to geologic or seismic hazards. For this reason, these components are not included as part of the geology/soils study area.”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
215.	Chapter 4.7	4.7-1	Under the heading 4.7.1 Setting Local Geology, please make the suggested revision to clarify the setting of the project area.	<p>Please revise as follows: "The Project is located on the Perris <u>Block</u> between the San Jacinto and <u>Elsinore Faults</u>, <u>Valley and the Perris Valley</u>, and is bounded by the Bernasconi Hills to the northwest and the Lakeview Mountains to the southeast. The Perris <u>Plain Block</u> consists of active valley deposits (late Holocene²) along the San Jacinto River, young alluvial-fan deposits (Holocene and late Pleistocene³) north of the proposed Lakeview Substation site, in Lakeview and along much of eastern portion of the fiber-optic route, old alluvial-fan deposits (late to middle Pleistocene) underlying the proposed Lakeview Substation site, the City of Nuevo, and much the <u>western portion of the Fiber-Optic #Route 1 and the southern portion of Fiber-Optic Route 2</u>, and granitic outcrops (Cretaceous⁴) that form the surrounding mountain ranges (Morton and Miller, 2006). Figure 4.7-1 shows the distribution of geologic units in the Project area. Regionally, the ground surface slopes gently downward in a southwest direction. Topography at the Project site is relatively flat and slopes gently to the northwest toward the San Jacinto River, located approximately 0.6 mile northwest of the 1 The Cenozoic and Mesozoic are is a geological eras that spans the period of 65,444 <u>from the present to 248 million years ago</u>. 2 The Holocene refers to a geological epoch dating from the present to about 10,000 years ago. 3 The Pleistocene refers to a geological epoch dating from about 10,000 years ago to about 1.8 million years ago. 4 The Cretaceous refers to a geological period dating from about 65 to 144 million years ago."</p>
216.	Chapter 4.7	4.7-2	Regarding Figure 4.7-1 , please remove Fiber Optic Cable Route 3 from the figure for the reasons described in SCE's accompanying cover letter and expand the view to include the location of Alessandro Substation.	Please revise Figure 4.7-1
217.	Chapter 4.7	4.7-2	Regarding Figure 4.7-2 , please remove Fiber-Optic Cable Route 3 from figure and legend for the reasons described in SCE's accompanying cover letter and expand the view to include the location of Alessandro Substation.	Please revise Figure 4.7-2 Geologic Map

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
218.	Chapter 4.7	4.7-3	Under the heading Soils , the names of the soils beneath the Project site are not included in the text and should be for consistency with the detail provided in other sections.	Please revise as follows: “The <u>soils</u> at the proposed Lakeview Substation site consist mostly of the Hanford coarse sandy loam unit with minor components of the Pachappa fine sandy loam and the Exeter sandy loam. These <u>units</u> range from coarse to fine sandy loam ⁵ , which is <u>are</u> well-drained soils, and has have low liquid limits ⁶ .”
219.	Chapter 4.7	4.7-3	Under the heading Soils , regarding the following sentence: “While Figure 4.7-2 does not show the fiber-optic line route, the soils underlying the length of the route are the same or similar as the Hanford coarse sandy loam (NRCS, 2008).” Portions of the fiber optic cable routes are seen on Figure 4.7-2.	Please revise as follows: “ While Figure 4.7.2 does not show the fiber-optic line route; <u>The soils underlying the length of the fiber-optic cable routes route consist of sandy loams with soil properties, are the same or similar as</u> the Hanford coarse sandy loam (NRCS, 2008).”
220.	Chapter 4.7	4.7-3	Under the heading Accelerated Erosion , the following sentence should be clarified: “Areas along the subtransmission source line underlain by the Domino silt loam and the Willows silty clay may have a higher potential for soil loss from erosion relative to other soils in the Project area due to their high erosion factor and/or runoff potential.” The document states that the Domino silt loam may have a higher potential for soils loss from erosion. The Domino silt loam is classified in hydrologic group C in Table 4.7-1, but there is no discussion on the erosion potential for this hydrologic group like there is for group D.	Please revise as follows: “Areas along the subtransmission source line and the fiber-optic cable Route 1 are underlain by the Domino silt loam and the Willows silty clay may have a higher potential for soil loss from erosion relative to other soils in the Project area due to their high erosion factor and/or runoff potential.”
221.	Chapter 4.7	4.7-3	Under the heading Soils , please clarify both subtransmission line segments are within the silty loam to course sandy loam areas.	Please revise as follows: “Soil types along the subtransmission line routes range from silty loam to course sandy loam. In the areas where the subtransmission source line routes crosses the San Jacinto River, soils range from silty clay to Riverwash.”
222.	Chapter 4.7	4.7-3	Under the heading Accelerated Erosion , please clarify both subtransmission line segments are underlain by the Domino silt loam.	Please revise as follows: “Areas along the subtransmission source line routes underlain by the Domino silt loam.....”

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
223.	Chapter 4.7	4.7-4	Regarding Figure 4.7-2 , remove Fiber Optic Cable Route 3 from the figure for the reasons described in SCE's accompanying cover letter.	
224.	Chapter 4.7	4.7-5, Table 4.7-1	Regarding Table 4.7-1 , please clarify there are multiple Subtransmission Source Line Routes.	Please revise as follows: "Subtransmission Source Line Routes"
225.	Chapter 4.7	4.7-5	Regarding Table 4.7-1 Soil Types Underlying the Project Area , the table lists the soil types at the proposed Lakeview Substation Site and along the Subtransmission Source Line Route. Based on the PEA and Figure 4.7-2 of the DEIR, a small portion of soil unit "Exeter sandy loam" is present in the northern west corner of the Site.	Please revise as follows: In Table 4.7-1, include physical properties for the Exeter sandy loam under the "Proposed Lakeview Substation Site" heading. Text describing the soil should be revised as noted in the comment above (Section 4.7.1, Page 4.7-3).
226.	Chapter 4.7	4.7-6	Under the heading Expansive Soils , the following sentence should be revised: "While no soils were identified as having the highest shrink/swell category ("very high"), the Willows silty clay, which underlies portions of the subtransmission source line route, is estimated to have a high shrink/swell potential (see Figure 4.7-2)." There are additional project features located within the soil units with high potential for shrinking and swelling.	Please revise as follows: "While no soils were identified as having the highest shrink/swell category ("very high"), the Willows silty clay, which underlies portions of the subtransmission source line route and the fiber-optic cable Route J, is estimated to have a high shrink/swell potential (see Figure 4.7-2)."
227.	Chapter 4.7	4.7-7	Under the heading Ground Subsidence and Fissure , please clarify Perris Plain should be Perris Block.	Please revise as follows: "Ground subsidence and associated fissures have been documented in basin fill sediments of the San Jacinto Valley and the Perris Plain Block."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
228.	Chapter 4.7	4.7-8	Under the heading Faults and Seismicity , please clarify reference to section should be segment.	Please revise as follows: “No active fault zones are present within 1 mile of the substation site. The San Jacinto Valley segment of the San Jacinto fault zone, located approximately 4 miles to the northeast of the proposed Lakeview Substation site, has the greatest ground acceleration potential (0.401 g) in the vicinity of the Project. The San Jacinto Valley segment includes the Casa Loma, Claremont, Hot Springs, and Park Hill faults. In addition, the San Jacinto Valley segment has a 31 percent probability of experiencing an earthquake greater than a 6.7 in magnitude over the next 30 years (USGS, 2008). Studies suggest that the San Jacinto Valley segment has a slip rate of greater than 5 millimeters per year, with a recurrence interval for large earthquakes of 65 to 98 years (USGS, 2010). The maximum historical earthquake magnitude on the Claremont segment was a 6.9 magnitude in 1918 (USGS, 2010).”
229.	Chapter 4.7	4.7-10	Under the heading Landslides , revisions to the following sentence are necessary for reasons explained in SCE’s accompanying cover letter, “Since the telecommunications line route would be attached above the ground surface to the existing Valley-Moval Subtransmission Line and the existing line is also in a topographically flat area with no mapped landslides...”	Please revise as follows: “Based on this information, the proposed Lakeview Substation site, and the subtransmission source line route, and the Alessandro Substation site are not located in an area susceptible to earthquake-induced landslides. These areas are flat and relatively distant from nearby slopes. Since the telecommunications line route would be attached above the ground surface to the existing Valley-Moval Subtransmission Line and the existing line is also in a topographically flat area with no mapped landslides, therefore, the potential for earthquake-induced landslides to affect these telecommunication facilities is considered low.
230.	Chapter 4.7	4.7-12	Under the heading Riverside County Department of Building and Safety Requirements , a footnote should be added to the following sentence to clarify that per GO 131-D only ministerial permits are secured from local jurisdictions, as applicable: “The Riverside County Grading Code requires a grading permit for earth-moving activities exceeding 50 cubic yards of material.”	Please insert the following footnote related to this sentence: “ <u>Local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. As such, a grading permit would only be obtained if it was ministerial.</u> ”

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
231.	Chapter 4.7	4.7-14	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not present a hazard to life or off-site property; therefore, the proposed telecommunication work within and adjacent to Alessandro Substation would have a less-than-significant impact with respect to strong seismic ground shaking and earthquake-induced ground failure.</p>	
232.	Chapter 4.7	4.7-15	<p>Under the heading Impact 4.7-1, for clarification, geotechnical investigation would not be required for all wood poles and TSPs.</p>	<p>Please revise as follows: "A geotechnical investigation of Alternative 2 would <u>may</u> be required prior to final design and construction, and would involve site soil characterization and testing, determination of seismic design coefficients, and recommendations for installation wood poles and TSPs, consistent with the CBC and CPUC General Order 95."</p>
233.	Chapter 4.7	4.7-16	<p>Under the heading Impact 4.7-2, the following sentence should be revised: "As discussed in the setting (see Table 4.7-1), these include portions of the subtransmission source line route underlain by the Domino silt loam and the Willows silty clay." Additional project features are located within the soil units with a high potential for shrinking and swelling.</p>	<p>Please revise as follows: "As discussed in the setting (see Table 4.7-1), these include portions of the subtransmission source line route <u>and</u> the fiber-optic cable Route <u>1</u> are underlain by the Domino silt loam and the Willows silty clay."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
234.	Chapter 4.7	4.7-16	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Result in substantial soil erosion or the loss of topsoil construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation is not expected to create or worsen issues related to soil erosion. The impact would be less than significant.</p>	
235.	Chapter 4.7	4.7-17	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off site landslides, lateral spreading, subsidence, liquefaction, or collapse, the potential risk from on- or off-site landslides at the work areas within and adjacent to Alessandro Substation is negligible because the topography of is relatively flat. The impact would be less than significant.</p>	
236.	Chapter 4.7	4.7-18	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) Be located on expansive soil, creating substantial risks to life or property expansive soils are not anticipated to be encountered during construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation. The impact would be less than significant.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
237.	Chapter 4.7	4.7-18	<p>Under the heading Impact 4.7-3, d, "As discussed in the setting, expansive soils were not encountered during the initial geotechnical investigation conducted for the proposed Lakeview Substation site; however, based on the regional soil survey, there are soils along the subtransmission source line route that could be subject to shrink/swell behavior (TDBU, 2009). Expansive soils along the source line route are unlikely to pose a geotechnical problem because subtransmission source line poles would be direct buried to depths of 9 to 40 feet (depending on pole type and location) using augured holes."</p> <p>Additional project features are located within the soil units with a high potential for shrinking and swelling.</p>	<p>Please revise as follows: "As discussed in the setting, expansive soils were not encountered during the initial geotechnical investigation conducted for the proposed Lakeview Substation site; however, based on the regional soil survey, there are soils along the subtransmission source line route and the fiber-optic cable Route 1 that could be subject to shrink/swell behavior (TDBU, 2009). Expansive soils along the source line route and the fiber-optic cable Route 1 are unlikely to pose a geotechnical problem because subtransmission source line/fiber-optic cable poles would be direct buried to depths of 9 to 40 feet (depending on pole type and location) using augured holes."</p>
238.	Chapter 4.7	4.7-18	<p>Under the heading Alternative 1: Phased Construction Alternative, the construction period would be extended by 12 months not 10 months. Please revise to reflect the accurate construction duration.</p>	<p>Please revise to: "While Alternative 1 would extend the period of construction by 10 12 months, it would not change the location and type of facilities to be constructed."</p>
239.	Chapter 4.7	4.7.18	<p>Under the heading Alternative 2: Relocated Substation Alternative, the text explains that the Proposed Lakeview Substation would be 0.25 mile to the northwest, however the distance should be changed to .125 mile.</p>	<p>Please revise to: "Alternative 2 would relocate the proposed Lakeview Station site approximately 0.25 0.125 mile to the northwest, closer to the San Jacinto corridor, resulting in a shorter subtransmission source line compared to the Project."</p>
240.	Chapter 4.7	4.7-19	<p>Under the heading Alternative 2: Relocated Substation Alternative, for clarification, geotechnical investigation would not be required for all wood poles and TSPs.</p>	<p>Please revise as follows: "A geotechnical investigation of Alternative 2 would may be required prior to final design and construction, and would involve site soil characterization and testing, determination of seismic design coefficients, and recommendations for installation of wood poles and TSPs, consistent with the CBC and CPUC General Order 95."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
241.	Chapter 4.8	4.8-6	<p>Under the heading Approach to Analysis, the text states that “the SCAQMD has adopted an operational significance threshold of 10,000 metric tons CO₂e per year for stationary/industrial sources.” This threshold is considered Draft and Interim Guidance and it is recommended that this is clarified in the text.</p>	<p>This analysis uses an approach for the determination of significance of GHG emissions based on the tiered decision tree approach recommended in the <i>South Coast Air Quality Management District (SCAQMD) Interim CEQA GHG Significance Threshold Draft Guidance Document</i>, which was adopted on December 5, 2008. GHG significance thresholds adopted by the South Coast Air Quality Management District (SCAQMD). The SCAQMD has proposed adopted an operational <u>screening</u> significance threshold of 10,000 metric tons CO₂e 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.</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
242.	Chapter 4.8	4.8.7	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would reduce annual GHG emissions due to reduced truck trip distance previously associated with Fiber-Optic Cable Route 3. The impact is less than significant.</p> <p>Under the heading Impact 4.8-1, update annual GHG emissions to account for reduced duration of the underground and aboveground fiber-optic cable installation associated with Alessandro Substation, and revised activity duration related to subtransmission construction, as presented in Table 2-9. In addition, please correct the number of proposed new circuit breakers and total capacity of SF6.</p>	<p>Please revise as follows: “however, indirect emissions related to energy consumption associated with the daily use of approximately 32,000 <u>62,000</u> gallons of water would also be generated during construction of the Project. The estimated total emission of GHGs that would be generated by Project construction activities is 1,713 <u>1,733</u> metric tons CO₂e.</p> <p>Regarding SF₆ circuit breaker leakage that would occur at the proposed Lakeview Substation, SCE estimates that the proposed two <u>six</u> new circuit breakers would have a total capacity of approximately 378 <u>384</u> pounds of SF₆.</p> <p>As indicated above, total GHG construction emissions in the form of CO₂e would be approximately 1,713 <u>1,733</u> metric tons. These emissions amortized over a 30-year project lifetime equal approximately 57 <u>58</u> metric tons per year. Adding 57 <u>58</u> metric tons CO₂e to the operational emissions of 42 metric tons CO₂e per year gives the total Project annual GHG emissions amount of approximately 99 <u>100</u> metric tons CO₂e per year, which would be substantially less than the SCAQMD’s significance threshold of 10,000 metric tons CO₂e per year for industrial sources.”</p>
243.	Chapter 4.8	4.8-8	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, the potential for GHG emissions generated during construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation to conflict with compliance of AB32 goals would be negligible and associated impacts would be less than significant.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
244.	Chapter 4.9	4.9-2	<p>Regarding the discussion related to Potential Presence of Hazardous Materials in Soil and Groundwater, the following statement is made, a review of regulatory agency database search report prepared by EDR (2012) to identify potential hazardous materials sites located within the vicinity of Alessandro Substation concluded that there was no evidence of such potential.</p>	<p>Please revise as follows: “As part of the Phase I investigation, Rubicon reviewed information regarding site history, performed a site reconnaissance to observe existing site conditions, and reviewed a regulatory agency database search report prepared by Environmental Data Resources (EDR) to identify hazardous materials sites located within the vicinity of the proposed Lakeview Substation site. Historical research indicated that the proposed Lakeview Substation site has been used for farming since at least 1938 and was currently used for growing potatoes. According to the property owner, use of an existing water well had been discontinued due to high selenium concentrations in groundwater throughout the valley that were not acceptable for agricultural purposes. This assessment revealed no evidence of recognized environmental conditions² at the proposed Lakeview Substation site (Rubicon, 2009) <u>or at the Alessandro Substation site (AECOM, 2012).</u>”</p> <p>“The database search of hazardous materials sites was updated and supplemented for this EIR to include a review of areas within 0.25 mile of all Project facilities using the online SWRCB GeoTracker (SWRCB, 2011 <u>and 2012</u>) and DTSC EnviroStor (DTSC, 2011 <u>and 2012</u>) databases.”</p>
245.	Chapter 4.9	4.9-3	<p>Under the heading Potential Presence of Hazardous Building Materials, please remove reference to lead as it is not typically contained in transformer oil.</p>	<p>Please revise as follows: “Although substation transformers now almost exclusively use mineral oil as an insulating agent, transformer oil historically used at substations contained several constituents of concern, including lead, petroleum hydrocarbons and polychlorinated biphenyls (PCBs).”</p>
246.	Chapter 4.9	4.9-3	<p>Under the heading Potential Presence of Hazardous Building Materials, for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE’s PEA.</p>	<p>Please revise to: “The Nuevo Substation and temporary Model Pole Top Substations include transformers, circuit breakers, wood poles, and associated equipment...”</p>
247.	Chapter 4.9	4.9-4	<p>Under the heading Wood Treatment Products, for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE’s PEA.</p>	<p>Please revise to: “The Project would remove 18 existing wood poles from the Nuevo Substation and temporary Model Pole Top Substations.”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
248.	Chapter 4.9	4.9-4	Under the heading Airports , please correct the reference distance and direction from the project to Hemet-Ryan Airport as well as the direction and name of the nearest Medical Center.	Please revise as follows: "The closest public airports to the Project are the Hemet-Ryan Airport, located 6.5 <u>8.4</u> miles south west <u>east</u> , and the Ontario International airport....", "There is also a helipad located 1.2 miles east west at the Riverside County Hospital <u>Regional Medical Center</u> (SCE, 2010)."
249.	Chapter 4.9	4.9-4	Under the heading Schools , Armada Elementary School located to the west of Alessandro Substation should be presented in the bulleted list, and based on proximity the first sentence should be revised to state "there are schools within the Project area...."	Please revise as follows: "There are no <u>is one</u> schools located within the Project area. Four existing schools and one proposed school are located within 0.25 mile of the Project: <ul style="list-style-type: none"> • <u>Armada Elementary School, located at 25201 John F Kennedy Drive, Moreno Valley, approximately 0.15 miles west of the Project.</u>
250.	Chapter 4.9	4.9-5	Under the heading Schools , please remove the fifth bullet point related to Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter.	Please revise as follows: " The proposed Wilmet Elementary School, located at Wilmet Avenue and Cactus Avenue, Moreno, approximately 0.3 mile south of the northern portion of the Fiber Optic Cable Route 3. "
251.	Chapter 4.9	4.9-11	Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows: Under CEQA criteria a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials , any hazardous materials needed for construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would be stored and used in accordance with the product specifications and applicable regulations. Impacts would be less than significant.	
252.	Chapter 4.9	4.9-12	Under the heading Impact 4.9-11 (Construction) , for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE's PEAs.	Please revise as follows: "Decommissioning of Nuevo Substation and temporary Model Pole Top Substations would require the removal of transformers and equipment containing mineral oil."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
253.	Chapter 4.9	4.9-13	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, any potential spills or leaks resulting from use of hazardous materials (fuels, lubricants, solvents) during construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would be reduced and controlled through implementation of BMPs established in the site specific SWPPP. Impacts would be less than significant.</p>	
254.	Chapter 4.9	4.9-15	<p>Under the heading Impact 4.9-3 (Construction), please clarify the SWPPP is not required for approval by the RWQCB.</p>	<p>Please revise as follows: "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."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
255.	Chapter 4.9	4.9-15	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Produce hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school, based on the proximity of Alessandro Substation to Armada Elementary School (<0.15 miles), the discussion should be revised accordingly. Although construction, operation, and maintenance activities within and adjacent to Alessandro Substation could result in the inadvertent release of small quantities of hazardous materials, a spill or release at a construction site would not result in an emission with the potential to result in exposures to individuals at nearby schools. Impacts would be less than significant.</p>	<p>Please revise as follows: “There are five existing or proposed schools located within 0.25 mile of the Project: one school within 0.15 mile of the fiber-optic cable installation work within and adjacent to Alessandro Substation; two schools within 0.25 mile of the Subtransmission Source Line Segment 2; two schools within 0.25 mile of the proposed Lakeview Substation site; and one proposed school located 0.3 mile from the construction, operation, and maintenance of northern portion of the Fiber Optic Cable Route 3.”</p>
256.	Chapter 4.9	4.9-15	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) 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, the work area within and adjacent to Alessandro Substation is not included on any lists of hazardous materials sites compiled pursuant to Government Code §65962.5, and therefore, would not create a significant hazard to the public or the environment. Impacts would be less than significant.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
257.	Chapter 4.9	4.9-16	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area, impact evaluation is deferred to criteria f. Impacts would be less than significant.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
258.	Chapter 4.9	4.9-16	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area, the impact evaluation has been revised to reflect additional underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation, and removal of Fiber-Optic Cable Route 3. Impacts would be less than significant.</p>	<p>Please revise as follows: "There are no public airports, public use airports, or private airstrips within 2 miles of the Project areas with aboveground construction. <u>The March Air Base is located within 2 miles of the underground fiber-optic cable and conduit installation work within and adjacent to Alessandro Substation, which would not result in a new safety hazards related to aviation due to nature of activity.</u> Therefore, there would be no safety hazards for substitution personnel during construction, operation or maintenance of the Project, and no impact to people residing or working in the Project area from airports or airstrips.</p> <p>Riverside County Regional Medical Center operates a helipad approximately 1.2 miles west of Fiber-Optic Cable Route 3 along the northern portion of the Valley Meval 115 kV Subtransmission Line and 1.4 miles southwest of the existing Moyal Substation. Similar to the existing transmission line, the proposed fiber-optic cable would be underground along Moreno Beach Drive, and above ground to the east along Broadiaea Avenue. Thus, the addition of the fiber-optic cable to the transmission line poles would not result in a new safety hazard. Personnel would only be present intermittently along the route during construction and operation for installation and routine maintenance and emergency repair, respectively.</p> <p>Therefore, safety hazards resulting from the construction, operation, and maintenance of proximity of this helipad to personnel associated with underground fiber-optic cable installation within and adjacent to Alessandro Substation Fiber-Optic Cable Route 3 during construction, operation, and maintenance would be less than significant.</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
259.	Chapter 4.9	4.9-17	<p>Under the heading Impact 4.9-5, to be consistent with Measure 4.17-4, please clarify any coordination with emergency service providers applies to the Project, and not only the subtransmission source line route.</p>	<p>Please revise as follows: "Measure 4.17-4 requires SCE and/or its contractors to coordinate all construction activities with emergency service providers for the Project in and along the subtransmission source line route to minimize disruption to emergency vehicle access (see Section 4.17, Transportation and Traffic)."</p>
260.	Chapter 4.9	4.9-16	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows: Under CEQA criteria g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?, construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would have temporary effects on traffic flow, and in places where trench work spans a road or requires a lane closure, construction activities would need to be coordinated with the local jurisdiction to avoid the closure of any emergency access route. Impacts would be less than significant. No additional impacts would result due to operation and maintenance.</p>	
261.	Chapter 4.9	4.9-17	<p>Regarding Impact 4.9-6, please remove the impact analysis discussions associated with this section as it relates solely to Fiber Optic Cable Route 3. The removal of Fiber Optic Cable Route 3 would eliminate the potentially significant impact as discussed; therefore, Mitigation Measure 4.9-6 would not be warranted.</p>	<p>Please remove the impact analysis for Impact 4.9-6 and Mitigation Measure 4.9-6.</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
262.	Chapter 4.9	4.9-16	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?, this impact no longer applies to the project with the removal of Fiber-Optic Cable Route 3. No impacts would result.</p>	
263.	Chapter 4.9	4.9-18	<p>Additionally, regarding Mitigation Measure 4.9-6, the language included in the measure would be problematic as the bullet points provide such specificity regarding fire prevention measures, such that construction workers shall receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire, which does not seem as the most beneficial way to mitigate. Coordination with Cal Fire and the local fire departments would provide better suited as a means to mitigate, as such discussions would provide SCE with specific requirements such as water amounts, proper equipment to be located on site (e.g. shovel, fire extinguisher, etc).</p>	
264.	Chapter 4.9	4.9-18	<p>Under the heading Alternative 1: Phased Construction Activities, as previously explained the construction duration would be extended by 12 months not 10 months.</p>	Please revise as follows: "Alternative 1 would extend the period of construction by <u>12</u> months, but would not change the location..."
265.	Chapter 4.9	4.9-18	<p>Under the heading Alternative 2: Relocated Substation Alternative, the text explains that the Proposed Lakeview Substation would be 0.25 mile to the northwest, however the distance should be changed to .125 mile.</p>	Please revise to: "Alternative 2 would relocate the proposed Lakeview Station site approximately <u>0.25</u> <u>0.125</u> mile to the northwest, closer to the San Jacinto corridor, resulting in a shorter subtransmission source line compared to the Project."
266.	Chapter 4.10	4.10-2	<p>Regarding Figure 4.10-1, please remove Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
267.	Chapter 4.10	4.10-4	Regarding Table 4.10-1 , please correct the typo with the spelling of Lake Elsinore.	Please revise as follows: "Lake Elsinore"
268.	Chapter 4.10	4.10-8	Under the heading: Regulatory Framework, Federal and State Water Quality Policies, Construction Stormwater NPDES Permit , in the second paragraph, last sentence, the Construction General Permit has been amended and the text should be updated to reflect the amendment.	Please revise as follows: "2009-0009-DWQ as amended by <u>2010-0014-DWQ</u> "
269.	Chapter 4.10	4.10-8	Under the heading Construction Stormwater NPDES Permit , please revise the text to reflect the fact that 2010-0014-DWQ prohibits contractors from filing the permit registration documents.	Please revise as follows: "The Construction General Permit requires the landowner and/or contractor project owner file ..."
270.	Chapter 4.10	4.10-8 through remaining section	Under the heading Construction Stormwater NPDES Permit , Order 2009-0009 is commonly known as Construction General Permit, not General Construction Permit.	Please search and replace "General Construction Permit" with "Construction General Permit"
271.	Chapter 4.10	4.10-8	Under the heading Construction Stormwater NPDES Permit , in the third paragraph, second sentence, the Construction General Permit requires that the online application package, called "Permit Registration Documents" (PRDs) be submitted via the SWRCB database, known as "Storm Water Multiple Application and Report Tracking System" (SMARTS). Please update subsequent references to NOI to PRDs throughout the section.	Please revise as follows: " These documents <u>The Permit Registration Documents (PRDs)</u> , include a Notice of Intent (NOI) , risk assessment, site map, and SWPPP , <u>and signed certification statement</u> and are submitted via the <u>SWRCB's database</u> , known as " <u>Storm Water Multiple Application and Report Tracking System</u> " (<u>SMARTS</u>) in order to obtain coverage under the <u>Construction General Permit.</u> "
272.	Chapter 4.10	4.10-8	Under the heading Porter-Cologne Water Quality Control Act , it should be clarified that only part of Riverside County is in the Santa Ana Regional Water Quality Control Board jurisdiction – much of the County is within the Colorado River Basin RWQCB jurisdiction.	Please revise as follows: " <u>The western-most area Riverside County, where the Project is planned, is under the jurisdiction of the SARWQCB.</u> "

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
273.	Chapter 4.10	4.10-9	<p>Under the heading Waste Discharge Requirements, in the first paragraph, fourth sentence, the DEIR description of this regulation does not take into consideration the definition of a waste to qualify the conditions under which soils excavated at the site would require a WDR.</p> <p>Soils could be considered a waste if they were impacted by hazardous materials.</p> <p>The text should be updated to clarify the condition under which excavated soils would require issuance or waiver of a WDR.</p>	<p>Please revise as follows: "For discharges directly to surface water (waters of the United States) an NPDES permit is required, which is issued under both state and federal law; for other types of discharges, such as waste discharges to land (e.g., spots disposal and storage soils found to be impacted with hazardous materials or meeting the definition of a waste), erosion from soil disturbance, or discharges to waters of the state (such as isolated wetlands), Waste Discharge Requirements (WDRs) are required and are issued exclusively under state law. <u>If needed</u>, SCE would contact the SARWQCB and file a Report of Waste Discharge; the SARWQCB then would determine whether an issuance or a waiver of WDRs is required."</p>
274.	Chapter 4.10	4.10-12	<p>Under the heading Riverside County Drainage Area Management Plan (DAMP)/ Santa Ana Watershed Protection Program (SAWPP), please correct the typo that references the order associated with the new NPDES permit.</p>	<p>Please revise as follows: "The new NPDES Permit (Order R2-RB8-2010-0033 ...)."</p>
275.	Chapter 4.10	4.10-12	<p>Under the heading Riverside County Drainage Area Management Plan (DAMP)/ Santa Ana Watershed Protection Program (SAWPP), the 1st paragraph on this page should introduce the idea that parts of the project may be considered as an LUP -- but that doesn't mean that the whole project is an LUP (at the time the Risk Analysis is completed, the Qualified SWPPP Developer may decide the best way to obtain permit coverage is for part of the site to be consider LUP and another part of the site as traditional).</p>	<p>Please revise as follows: "The Project has linear components and, therefore the LUP provisions would apply, the Qualified SWPPP Developer may decide, at the time that permit coverage is obtained, that portions of the Project should be covered under Attachment A of the Construction General Permit. Attachment A specifically applies to linear underground/overhead projects (LUPs)."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
276.	Chapter 4.10	4.10-15	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under the heading Impact Analysis and question a) Violate any water quality standards or waste discharge requirements?, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation results in less land disturbance compared to previously described Fiber-Optic Cable 3; impacts would be less than significant.</p>	
277.	Chapter 4.10	4.10-15	<p>Under the heading Impact 4.10-1 (Construction), the total number of acres disturbed, as seen in the following sentence should be updated based on the revisions provided by SCE in the project description.</p> <p>“The total disturbance area associated with Project implementation would be approximately 80 acres.”</p>	
278.	Chapter 4.10	4.10-17	<p>Under the heading Impact 4.10-1 (Construction), the RWQCBs do not make determination that a project is a particular risk type. Such a determination is done by the Qualified SWPPP Developer. However, the RWQCB may reject a QSD’s determination. The final determination cannot be made until permit coverage is obtained, because factors in the Risk Assessment can change over time (for example, the 303(d) list may be updated before permit coverage is obtained for the Project), therefore the text should be revised.</p>	<p>Please revise as follows: “Portions of The the Project is may be considered a LUP by the SARWCB and has been evaluated as ...”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
279.	Chapter 4.10	4.10-17	<p>Under the heading Impact 4.10-1 (Construction), in the fifth paragraph, the DEIR description of the WDR regulation does not take into consideration the definition of a waste to qualify the conditions under which excavated soils or imported fill would require a WDR.</p> <p>Soils or imported soil could be considered a waste if they were impacted by hazardous materials.</p> <p>The text should be updated to clarify the condition under which excavated soils would require issuance or waiver of a WDR.</p>	<p>Please revise as follows: “The temporary storage Discharge to land of excavation material and imported fill that are found to meet the State of California’s definition of a waste would likely require issuance of WDRs or a waiver thereof issued by the SARWQCB. SCE and/or its contractors would be required to comply with the WDRs should they apply to the Project, and any storage or excavation materials and fill that are found to be impacted with hazardous materials or meet the definition of a waste would be required to be consistent with the water quality objectives defined in the Basin Plan (SARWQCB, 2010). Prior to discharges of waste to the land surface, the Applicant would contact the SARWQCB and file a ROWD; the SARWQCB would then determine whether an issuance or a waiver of WDRs would be required. SCE and/or its contractors would be required to comply with all provisions of the WDRs.”</p>
280.	Chapter 4.10	4.10-18	<p>Under the heading Impact 4.10-1 (Construction), in the last paragraph, the DEIR analysis of this impact states that the implementation of the WDR as an existing measure, that is required of the Applicant that will make the impact less than significant.</p> <p>The WDR permit would be required if the excavated soils or imported fill meet the definition of wastes Based on the Phase 1 and other preliminary environmental studies conducted the excavated soils are not expected to be wastes, and therefore this permit should not be required for the project. In addition imported fill would similarly be reviewed before shipment to the site and would not be considered a waste.</p> <p>Further if SCE was to encounter soil that was impacted with hazardous materials or suspected of being impacted with a hazardous material, SCE would analyze and dispose of it accordingly (as discussed per Section 4.9 Hazards and Hazardous Materials)</p>	<p>Please revise as follows: “The existing measures required of the Applicant (e.g., the General Construction Permit/SWPPP implementation, WDRs (if required), and LUP standards) are sufficient to reduce construction-related water quality impacts to a less-than-significant level.”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
281.	Chapter 4.10	4.10-19	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?, groundwater is not likely to be encountered during construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation, and dewatering would not be required. Therefore, construction and operational impacts to groundwater supplies would be less than significant.</p>	
282.	Chapter 4.10	4.10-20	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Substantially alter the existing drainage pattern of a site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or sedimentation on- or off-site; impact evaluation is deferred to criteria e.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
283.	Chapter 4.10	4.10-20	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?, impact evaluation is deferred to criteria e.</p>	
284.	Chapter 4.10	4.10-20	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?, the telecommunication system within and adjacent to Alessandro Substation would not add any new aboveground structures. Therefore, there would not be any significant changes to the existing drainage patterns of the area or to any stream or watercourse due to the telecommunication system. Impact would be less than significant.</p>	
285.	Chapter 4.10	4.10-21	<p>Under the heading Impact 4.10-3, sub-bullet Subtransmission Lines, Wood Poles, and TSPs, please revise TSP footing diameter to be consistent with Table 2-1, page 2-13. Also, TSP spacing will be based on final engineering.</p>	<p>Please revise as follows: "Each TSP would have a footprint concrete foundation of up to 4ft in between 5 to 8 feet in diameter and would be spaced approximately every 200 feet."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
286.	Chapter 4.10	4.10-22	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows, the telecommunication system within and adjacent to Alessandro Substation would not be placed within a 100-year flood hazard area. Impacts would be less than significant.</p>	
287.	Chapter 4.10	4.10-22	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, because dam failure is unlikely, and because the effects to the telecommunication system installation within and adjacent to Alessandro Substation under a worstcase scenario would be minor, the impact would be less than significant impact with respect to flooding from failure of a dam.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
288.	Chapter 4.10	4.10-22	<p>Under the heading Impact 4.10-5, in the summary sentence for the impact, the DEIR has incorrectly rated the impact as <i>Less than Significant with Mitigation (Class II)</i>".</p> <p>The Executive Summary in the DEIR (Table ES-1, page ES-18) states that all Hydrology and Water Quality Impacts were determined to be <i>Less than Significant (Class III)</i>.</p> <p>The DEIR analysis presented as backup for Impact 4.10-5 concludes that impacts from the Project would be <i>Less than Significant</i>. This detailed analysis does not discuss any mitigation measures. At the end of this section, the analysis states that there are no mitigation measures required.</p>	<p>Please revise Impact 4.10-5 as follows: "Project operation could expose people or structures to impacts resulting from flooding as a result of a failure of a levee or dam. <i>Less than Significant ### Mitigation# (Class H-III)</i>."</p>
289.	Chapter 4.10	4.10-23	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria j) Inundation by seiche, tsunami, or mudflow, the telecommunication system within and adjacent to Alessandro Substation would not be subject to any risks different than that already discussed in the analysis within the DEIR for the Project.</p>	
290.	Chapter 4.10	4.10-23	<p>Under the heading Alternative 1: Phased Construction Alternative, the construction duration would be extended by 12 months, not 10 months.</p>	<p>Please revise as follows: "Alternative 1 would extend the period of construction by 40 12 months, but would not change the location and type of facilities to be constructed."</p>
291.	Chapter 4.10	4-10-24	<p>Under the heading Alternative 2: Relocated Substation Alternative, the text explains that the Proposed Lakeview Substation would be 0.25 mile to the northwest, however the distance should be changed to .125 mile.</p>	<p>Please revise as follows: "Alternative 2 would relocate the proposed Lakeview Station site approximately 0.25 0.125 mile to the northwest, closer to the San Jacinto corridor, resulting in a shorter subtransmission source line compared to the Project."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
292.	Chapter 4.10	4.10-24	<p>Under the heading Alternative 2: Relocated Substation Alternative, The DEIR determined that there was Less than Significant Impact for all CEQA criterion regarding hydrology and water quality for the Relocated Substation Alternative except for criteria h) and j). For these criteria the DEIR determined that the impact from the Relocated Alternative Substation construction would be Less than Significant with implementation of a mitigation measure. The DEIR added Mitigation Measure Alternative 2-HYD-1 requiring design to conform to County and FEMA requirements.</p> <p>The location of the Relocated Alternative Substation is not shown on Figure 4-10.1 nor Figure 2-1 in the DEIR, so it is not possible to adequately review the impact analysis. The DEIR only verbally describes a general location for the Relocated Alternative Substation.</p> <p>Under the heading Environmental Setting, Model Pole Top should be referenced as a "temporary Model Pole Top Substation."</p>	<p>Please revise Figure 4-10.1 and Figure 2-1 to show the location of the Relocated Alternative Substation relative to the 100-year flood plain.</p>
293.	Chapter 4.11	4.11-1	<p>Under the heading Environmental Setting, Model Pole Top should be referenced as a "temporary Model Pole Top Substation."</p>	<p>Please revise as follows: "The Applicant's existing 33/12kv Nuevo Substation; and temporary Model Pole Top Substations, and ancillary power poles,..."</p>
294.	Chapter 4.11	4.11-2	<p>Under the heading Local regarding the Riverside County General Plan, per SCE's accompanying letter, please revise the number of fiber-optic cable routes. In addition, for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE's PEA.</p>	<p>Please revise as follows: "The Project's two <u>three</u> fiber-optic cable routes..." "The Nuevo Substation and temporary Model Pole Top Substations site is <u>are designated...</u>"</p>
295.	Chapter 4.11	4.11-3	<p>Regarding Figure 4.11-1, please correct the color coding of the Fiber-Optic Routes to be consistent. Additionally, please remove Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter.</p>	<p>Please revise Fiber-Optic Route 1 to be orange and Fiber-Optic Route 2 to be brown.</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
296.	Chapter 4.11	4.11-5	Under heading Moreno Valley General Plan , make appropriate updates to setting based on removal of Fiber Optic Line Route 3 from Project Description.	Please revise text as follows: "The proposed telecommunications route traverses north into the City of Moreno Valley. Therefore, the Moreno Valley General Plan was reviewed for applicable land use goals and policies. As portrayed in Figure 4.11-2, City of Moreno Valley General Plan Land Use Designations, the Project would traverse parcels with designated land uses of Rural Residential (RR) , Open Space (OS) , and Low Density Residential-Residential-Maximum 2 du/ae (R2) , Residential-Maximum 3 du/ae (R3) , Residential-Maximum 5 du/ae (R5) , Residential-Maximum 10 du/ae (R10) , and Commercial (C) (City of Moreno Valley, 2006)."
297.	Chapter 4.11	4.11-7	Under the heading a) Physical division of an established community , per SCE's accompanying letter, please remove references to Fiber Optic Route 3. Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:	Please revise to: "Although a portion of the Fiber Optic Route 3 would traverse a community, it would be an addition to existing infrastructure."
298.	Chapter 4.11	4.11-7	Under CEQA criteria a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials , any hazardous materials needed for construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would be stored and used in accordance with the product specifications and applicable regulations. Impacts would be less than significant.	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
299.	Chapter 4.11	4.11-7	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, any potential spills or leaks resulting from use of hazardous materials (fuels, lubricants, solvents) during construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would be reduced and controlled through implementation of BMPs established in the site specific SWPPP. Impacts would be less than significant.</p>	
300.	Chapter 4.11	4.11-8	<p>Under the heading Moreno Valley General Plan, please update text to reference the telecommunications work associated with Alessandro Substation.</p>	<p>Please revise as follows” “Construction, operation, and maintenance of the Project would be <u>mostly</u> inconsistent with Policy 7.7.2, which requires new electrical and communication lines to be placed underground because all electrical and a majority of the telecommunication lines are proposed above ground. <u>However, the fiber-optic cable installation at the Alessandro Substation would be placed underground.</u>”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
301.	Chapter 4.11	4.11-9	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under the heading c) Conflict with any applicable habitat conservation plan or natural community conservation plan, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in any new or additional impacts to habitat or natural communities. No impacts would result.</p>	
302.	Chapter 4.11	4.11-9	<p>Under the heading Impact 4.11-1, as explained in Resource Section 4.4 Biological Resources, SCE would participate in the MSHCP to mitigate any impacts to species covered under the plan. As such, there would be a less than significant impact with regard to CEQA Significance Criterion c). Additionally, Mitigation Measure 4.11-1 would not be warranted.</p>	Please revise the Impact Analysis for this section and delete Mitigation Measure 4.11-1.
303.	Chapter 4.11	4.11-10	<p>Under the heading Alternative 2: Relocated Substation Alternative, for the reasons previously described in Comment #302, please remove the reference to implementation of mitigation measure 4.11-1.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
304.	Chapter 4.12	4.12-2	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under the heading b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in impacts to a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impacts would result.</p>	
305.	Chapter 4.12	4.12-3	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under the heading a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in impacts to the availability of known mineral resources. No impacts would result.</p>	
306.	Chapter 4.12	4.12-3	<p>Under the heading Alternative 1: Phased Construction Alternative, the construction duration would be extended by 12 months, not 10 months. Please revise to reflect the accurate construction duration.</p>	<p>Please revise as follows: "Alternative 1 would extend the construction period by 10 <u>12</u> months; however the location and type of facilities proposed would remain the same."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
307.	Chapter 4.13	4.13-4	Under the heading Existing Ambient Noise Environment , please remove references to Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter.	Please revise as follows: "The main contributor to the existing noise environment in the study area is vehicle traffic on major roadways in the study area, including Lakeview Avenue, 10th Street, and Ramona Expressway, and Moreno Beach Drive. To a lesser extent, aircraft overflights also contribute to the ambient noise environment. March Air Reserve Base is approximately 4 miles west-southwest of Fiber-Optic Cable Route 3, and Perris Valley Airport is approximately 7 miles southwest of the proposed Lakeview Substation site. "
308.	Chapter 4.13	4.13-5	Regarding Figure 4.13-1 Ambient Noise Monitoring Location , please remove Fiber Optic Cable Route 3 for the reasons explained in SCE's accompanying cover letter.	
309.	Chapter 4.13	4.13-6	Under the heading Fiber-Optic Cable Routes , please revise description of sensitive receptors to account for removal of Fiber Optic Cable Route 3 from Project Description and replacement with new telecommunications work at Alessandro Substation.	Please revise as follows: The overhead portion of Fiber-Optic Cable Route 3 would be within approximately 500 feet of at least one residence along Alessandro Boulevard, approximately 50 to 100 feet of 28 residences along Broadmead Avenue, and approximately 150 feet and 200 feet from a residential trailer park and a horse ranch along Davis Road, respectively. In addition, the overhead portion of Fiber-Optic Cable Route 3 would be constructed either on or immediately adjacent to Lake Perris State Recreation Area from the Moreno Valley City limit to the existing Bunker Nelson fiber-optic cable line. The fiber-optic cable installation at Alessandro Substation would be within approximately 150 feet of the backyards of at least three residences along Rencher Court, approximately 160 feet of the backyards of at least two residences along Josephine Court, within approximately 25 feet of four backyards residences along Kitching Street, and within approximately 840 feet of the Armada Elementary school to the west. "

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
310.	Chapter 4.13	4.13-6	Under the heading Fiber Optic Cable Routes , please remove references to Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter and please replace with the mention of the new telecommunications work at Alessandro Substation.	Please revise as follows: "The underground portion of Fiber-Optic-Cable Route 3 would be within approximately 50 feet of the backyards of at least three residences along Swaps Street and would be within approximately 200 feet of the Riverside County Fire Department Moreno Beach Fire Station that is located on Bay Avenue. The overhead portion of Fiber-Optic-Cable Route 3 would be within approximately 500 feet of at least one residence along Alessandro Boulevard, approximately 50 to 100 feet of 28 residences along Broadface Avenue, and approximately 150 feet and 200 feet from a residential trailer park and a horse ranch along Davis Road, respectively. In addition, the overhead portion of Fiber-Optic-Cable Route 3 would be constructed either on or immediately adjacent to Lake Perris State Recreation Area from the Moreno Valley City limit to the existing Bunker Nelson fiber-optic cable line. The fiber-optic cable installation at Alessandro Substation would be within approximately 150 feet of the backyards of at least three residences along Rencher Court, approximately 160 feet of the backyards of at least two residences along Josephine Court, within approximately 25 feet of the backyards of at least four residences along Kitching Street, and within approximately 840 feet of Armada Elementary school to the west."
311.	Chapter 4.13	4.13-7	Under the heading Relocated Substation Alternative , the text explains "the relocated substation site and subtransmission source line segment 2 would be as close as approximately 0.5 mile northwest, and 0.4 mile west-northwest of Nuvview Elementary School and Nuvview Special School, respectively." However, the distances from the alternative to the school is closer and should be revised.	Please revise as follows: "The relocated substation site and subtransmission source line segment 2 would be as close as approximately 0.5 0.375 mile northwest, and 0.4 0.314 mile west-northwest of Nuvview Elementary School and Nuvview Special School, respectively."
312.	Chapter 4.13	4.13-7	Under the heading Riverside County General Plan , please clarify the policies identified in the General Plan Noise Element (Riverside County, 2008) are for informational purposes only.	Please revise as follows: "However, for informational purposes only, CPUC staff considered the following policies identified in the General Plan Noise Element (Riverside County, 2008) to inform the determination of significance thresholds for the study area:"

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
313.	Chapter 4.13	4.13-8	Under the heading Riverside County Code , the text references the noise criteria from the county code being consistent with the standards presented in the General Plan. However, based on Table 4.13-2, these two criteria do not appear consistent.	Please revise as follows: “These criteria are consistent with the standards presented in the County’s General Plan.”
314.	Chapter 4.13	4.13-9	Under the heading City of Moreno Valley Municipal Code , please remove references to Fiber Optic Cable Route 3 for the reasons described in SCE’s accompanying cover letter. Please replace with the mention of the telecommunications work at Alessandro Substation.	Please revise as follows: “... would be applicable to construction of the underground , and a portion of the overhead , Fiber-Optic-Cable Route-3 would be applicable to construction of <u>underground fiber optic cable installation at Alessandro Substation.</u> ”
315.	Chapter 4.13	4.13-11	Regarding the analysis for Impact 4.13-1 , the text incorrectly references Section 2.7.2 Marshalling Yards it is actually Section 2.8.2. Additionally, as explained in SCE’s PEA, construction is anticipated to comply with the applicable noise ordinances and if not possible, SCE would seek a variance from the applicable agency. Based on this information, SCE would not violate either municipality’s applicable noise ordinance, as such no mitigation would be required.	Please revise as follows: “Chapter 2, <i>Project Description</i> , does not identify a daily construction schedule for the Project; however, Section 2.7.2 <u>2.8.2</u> , <i>Marshalling Yards</i> ,...” Please remove Mitigation Measure 4.13-1.

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
316.	Chapter 4.13	4.13-11	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, please revise discussion of construction activities within City of Moreno Valley based on removal of Fiber-Optic Cable Route 3 and replacement with fiber-optic cable installation within and adjacent to Alessandro Substation. Although work within and adjacent to Alessandro Substation would be conducted in close proximity to residences and a school, levels would not exceed the City of Moreno Valley's maximum continuous noise level limits.</p>	<p>Please revise as follows: The majority of Fiber-Optic Cable Route-3 installation within and adjacent to Alessandro Substation, including the underground cable and most of the overhead cable, would be constructed within the City of Moreno Valley. As stated in Table 4.13-3, the City of Moreno Valley has adopted municipal code maximum continuous sound level limits, including 90 dBA for sounds that occur continuously for 8 hours. Construction activities related to installation of the underground fiber-optic cable within the east side of Moreno Beach Drive-Kitching Street would be the closest activities to occur near existing sensitive receptors. Underground construction activities along Moreno Beach Drive-Kitching Street would occur approximately 50-25 feet from the construction, operation, and maintenance of rear yards of residences along Swaps Street-fronting San Lope Avenue.</p> <p>Heavy construction equipment that would be required for underground fiber-optic cable installation would include one backhoe and one concrete mixer. In addition to this equipment, fiber-optic cable installation in Kitching Street would require removal of pavement, which would require the use of a mounted, or handheld, jackhammer. Backhoes and concrete mixers can be expected to generate maximum sound levels of approximately 80 dBA and 85 dBA, respectively (FTA, 2006). Pavement breaking can generate noise levels of up to 90 dBA. In the unlikely event that two pieces of equipment a backhoe and concrete mixer would operate at one location continuously for 8 hours, the maximum combined continuous sound level at 50-25 feet would be approximately 86-92 dBA, which would not exceed the City's maximum continuous sound level limits. However, construction activities such as trenching and paving are linear and allow for equipment movement within an 8-hr period. Therefore, it is unlikely that Project construction activities would result in noise levels that would exceed City of Moreno Valley maximum continuous sound level limits; therefore, no impact related to a violation of the City of Moreno Valley's maximum noise level limits would occur (No Impact).</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
317.	Chapter 4.13	4.13-12	Under the heading Construction , please revise the text to include the new telecommunications scope at Alessandro Substation and remove references to Fiber Optic Cable Route 3.	<p>Please revise as follows: “The majority of Fiber-Optic Cable Route-3, installation at Alessandro Substation including the underground-cable-and-most-of-the-overhead-cable, would be constructed within the City of Moreno Valley. As stated in Table 4.13-3, the City of Moreno Valley has adopted municipal code maximum continuous sound level limits, including 90 dBA for sounds that occur continuously for 8 hours. Construction activities related to installation of the underground fiber-optic cable within the east-side of Moreno-Beach-Drive Kitching Street would be the closest activities to occur near existing sensitive receptors. Underground construction activities along Moreno-Beach-Drive-Kitching Street would occur approximately 50 25feet from the rear yards of residences along Swaps-Street fronting San Lupe Avenue.</p> <p>Heavy construction equipment that would be required for underground fiber-optic cable installation would include one backhoe and one concrete mixer. <u>In addition to this equipment, fiber optic cable installation in Kitching Street would require removal of pavement requiring the use of a mounted or handheld jackhammer</u> Backhoes and concrete mixers can be expected to generate maximum sound levels of approximately 80 dBA and 85 dBA, respectively (FTA, 2006). Pavement breaking can generate noise levels up to 90 dBA. <u>In the unlikely event that two pieces of equipment a backhoe and concrete mixer would operate at one location continuously for 8 hours, the maximum combined continuous sound level at 50 25feet would be approximately 86 92 dBA, which would not exceed the City’s maximum continuous sound level limits, however, linear projects such as trenching and paving do not include equipment operation in the same location for 8 hours. Therefore, it is unlikely that Project construction activities would result in noise levels that would exceed City of Moreno Valley maximum continuous sound level limits; therefore, no impact related to a violation of the City of Moreno Valley’s maximum noise level limits would occur (No Impact).”</u></p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
318.	Chapter 4.13	4.13-12	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Expose people to or generate excessive groundborne vibration or groundborne noise levels construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not exceed noise levels; revised discussion presented to account for noise and vibration within and adjacent to Alessandro Substation.</p> <p>Under the heading Impact 4.13-2 (Construction), please revise the text to reflect the new telecommunication scope at Alessandro Substation.</p>	<p>Please revise as follows: "These pieces of equipment can generate vibration levels of up to 0.09 PPV in/sec at a distance of 25 feet. However, vibration levels attenuate rapidly from the source. At a distance of 50 feet, which is the approximate distance that the closest residences to the Subtransmission Source Line Segment 2, Fiber-Optic Cable Routes 1 and 2, and the Alessandro Substation would be to active heavy construction equipment, vibration would be up to <u>0.07 PPV in./sec.</u></p> <p>The PPV threshold of 0.20 in/sec identified by Caltrans (2004) is used in this analysis to determine the significance of vibration impacts related to adverse human reaction, and the Federal Transit Administration (FTA) PPV threshold of 0.12 PPV in/sec for buildings extremely susceptible to vibration damage is used to determine the significance of vibration impacts related to risk of architectural damage to buildings (FTA, 2006).</p> <p><u>With the exception of boring under the storm drain adjacent to Kitching Street, typical construction activities associated with the subtransmission source line and fiber-optic cable installation would not be concentrated at the same location for an extended period; rather, they would progress in a linear fashion along the proposed corridors. The boring under the storm drain would be stationary, the duration of the actual boring activity would be less than a full day and, as indicated would not exceed 0.7 PPV in./sec."</u></p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
319.	Chapter 4.13	4.13-14	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, operation and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would result in negligible amounts of noise and would not be expected to conflict with applicable noise ordinances and plans. Impacts would be less than significant.</p>	
320.	Chapter 4.13	4.13-15	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) Cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, Existing residents near construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation elements would experience a temporary increase in noise levels above those existing without the activity. Therefore, construction-related noise levels may be considered to be a nuisance to the closest sensitive receptors. Although the loudest noise levels at the nearest residences would be greater than 90 dBA, the level established by the FAA where adverse community reaction occurs, the short-term, linear nature of the trench work would not be expected to cause a substantial nuisance to nearby residences. Impacts would be less than significant.</p>	
321.	Chapter 4.13	4.13-16	<p>Under the heading Impact 4.13-4, for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE's PEA.</p>	<p>Please revise as follows: ".....and existing Nuevo Substation and temporary Model Pole Top Substations."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
322.	Chapter 4.13	4.13-16	<p>Under the heading Impact 4.13-4, as previously explained, construction is anticipated to comply with the applicable noise ordinances and if not possible, SCE would seek a variance from the applicable agency. Based on this information, SCE would not violate either municipality's noise ordinance, as such no mitigation would be required.</p> <p>In addition, the standard used in this impact discussion is whether a substantial temporary or periodic increase in noise levels would occur. It is not whether a nuisance would be created.</p>	<p>Please revise as follows: "In addition, implementation of Mitigation Measure 4.13-1 would ensure that construction activities would be limited to daytime hours pursuant to Riverside County Code and City of Moreno Valley municipal code restrictions (see Impact 4.13-1), when the construction related increase in noise levels would be less of a nuisance to nearby sensitive receptors. Therefore, impacts would be mitigated to a less than significant level."</p> <p>Remove Mitigation Measure 4.13-4.</p>
323.	Chapter 4.13	4.13-17	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels, the underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not be located within an airport land use plan area nor would it be located within 2 miles of any public airport. The March Air Force Base is within 2 miles of Alessandro Substation; however it is an airstrip and is not open to public use. Therefore, no impact would occur (No Impact).</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
324.	Chapter 4.13	4.13-17	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under the CEQA criteria f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels, the underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would be located within 2 miles of the March Air Force Base; temporary noise impacts during construction would not contribute significantly to the existing noise generated from planes utilizing the Base.</p> <p>Based on the proximity of Alessandro Substation to the March Air Force Base, the impact conclusion has been revised from no impact to less than significant.</p>	<p>Please revise as follows: <u>“Underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would be located within 2 miles of the March Air Force Base, which is a private airstrip. Although noise impacts during construction would contribute to existing noise levels, the short-term, temporary duration and linear nature of activities would not result in significant noise impacts. Therefore, the impact would be less than significant. (Less than significant). The Project would not be located in the vicinity of a private airstrip; therefore, no impact would occur (No Impact).”</u></p>
325.	Chapter 4.13	4.13-17	<p>Under the heading Alternative 1: Phased Construction Alternative, the text should be clarified that noise impacts are assessed based on the distance of a project-related noise source (construction and operation) to nearby receptors. The use of the phrase “at the local level” does not aid the reader in determining how impacts would be the same.</p>	<p>Please revise as follows: <u>“From a noise impact perspective, which is assessed at the local level for each component of the Project based on the distance from Project-related activities and facilities to nearby receptors, Alternative 1 would involve construction and operation in the same locations as that of the Project, and therefore, impacts under this alternative would be the same as the Project.”</u></p>
326.	Chapter 4.14	4.14-1	<p>Under the heading 4.14 Population and Housing, please revise the description related to the proposed telecommunications route for the reasons described in SCE’s accompanying cover letter.</p>	<p>Please revise as follows: <u>“A portion of the proposed telecommunication route would traverse north. The fiber optic cable installation at Alessandro Substation would occur into the within the City of Moreno Valley.”</u></p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
327.	Chapter 4.14	4.14-5	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Induce substantial population growth in an area, either directly or indirectly, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in indirect or direct population growth. Therefore, no impact would occur.</p>	
328.	Chapter 4.14	4.14-5	<p>Under the heading Impact 4.14-1, please clarify the following sentence:</p> <p>“The proposed subtransmission source line segments and telecommunication routes would include installation of subtransmission poles, subtransmission conductor cables, and fiber optic telecommunication cables in new and existing utility ROW’s.....”</p>	<p>Please revise as follows: “The proposed subtransmission source line segments and telecommunication routes would include installation of subtransmission poles, subtransmission conductors cables, and fiber optic telecommunication cables in new and existing utility ROW’s.....”</p>
329.	Chapter 4.14	4.14-6	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Displacement of existing housing units, necessitating the construction of replacement housing elsewhere, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in displacement of existing housing units. Therefore, no impact would occur.</p>	
330.	Chapter 4.14	4.14-6	<p>Under the heading b) Displacement of existing housing units, necessitating the construction of replacement housing elsewhere, please revise the description related to the proposed telecommunications route for the reasons described in SCE’s accompanying cover letter.</p>	<p>Please revise as follows: “The telecommunication system would traverse open-space, wilderness areas, commercial areas in the City of Moreno Valley, and residential areas in the community of Lakeview, but would not displace existing housing units.”</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
331.	Chapter 4.14	4.14-6	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Displacement of people, necessitating the construction of replacement housing elsewhere, the construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not eliminate housing or any other structures that are currently used by people. Therefore, it would have no impact with regard to the displacement of people, and would not necessitate the construction of replacement housing elsewhere (No Impact).</p>	
332.	Chapter 4.14	4.14-6	<p>Under the heading Alternative 1: Phased Construction Alternative, the text indicates that construction would be extended by 10 months, however it would actually be extended by 12 months, as previously communicated to the CPUC.</p>	<p>Please revise as follows: "Alternative 1 would extend the construction period by 10 12 months."</p>
333.	Chapter 4.15	4.15-2	<p>Under the heading Moreno Valley Fire Department, please update the description of the fire station located closest to the telecommunication line route to reflect change in project description due to underground fiber-optic cable installation at Alessandro Substation.</p>	<p>Please revise as follows: The fire station closest to the telecommunication line route <u>installation</u> would be <u>Station 91 College Park</u>, located at <u>16110 Lasselle Street approximately 1 mile southeast of Alessandro Substation, 8 Moreno Beach, 28040 Eucalyptus Avenue and which serves the eastern-southern end of the city</u> (MVFD, 2011).</p>
334.	Chapter 4.15	4.15-3	<p>Under the heading Schools, please include Armada Elementary School based on the new telecommunications work associated with Alessandro Substation.</p>	<p>Please add the following under the last bullet for schools located near the project site.</p> <ul style="list-style-type: none"> • <u>Armada Elementary School, 25201 John F. Kennedy Drive, Moreno Valley (MVUSD)</u>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
335.	Chapter 4.15	4.15-4	Under the heading Other Public Facilities , please remove the description related to the telecommunications route (Fiber Optic Cable Route 3) for the reasons described in SCE’s accompanying cover letter.	Please revise as follows: “The closest hospital facility to the Project is Kaiser Moreno Valley Community Hospital, at 27300 Iris Avenue, Moreno Valley, located south west of the existing Alessandro Substation and west of the proposed telecommunications route (Kaiser Permanente, 2011).”
336.	Chapter 4.15	4.15-4	Under the heading Moreno Valley General Plan , a general description of policies that may be relevant to the project are provided. Similar to the information provided in the preceding section, it should be noted that this information is provided for informational purposes only and that the local land use regulations do not apply to the Project, per CPUC General Order 131-D.	Please revise the paragraph under the heading Moreno Valley General Plan to read as follows: CPUC General Order No. 131-D explains that local land use regulations would not apply to the Project. For information purposes, the following policies identified in the Moreno Valley General Plan would otherwise be relevant to the Project. The Moreno Valley General Plan includes the following policies that may be relevant to the Project.
337.	Chapter 4.15	4.15-5	Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows: Under CEQA criteria a.i) Fire Protection the construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in substantial population increases typically associated with long-term demand for fire protection services. No impacts would occur.	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
338.	Chapter 4.15	4.15-6	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a.ii) Police Protection, the construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in substantial population increases typically associated with long-term demand for police protection services. No impacts would occur.</p>	
339.	Chapter 4.15	4.15-7	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a.iii) Schools the construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in substantial population increases typically associated with demand for public school services. No impacts would occur.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
340.	Chapter 4.15	4.15-7	<p>Under the section a.iii) Schools, estimates are provided that describe the temporary increase in the number of students that could, under a conservative approach, be enrolled in the local school systems during the duration of the project.</p> <p>These estimates seem to greatly over-estimate the realistic number of children that could be temporarily be enrolled in local schools by assuming that every crewmember would be representative of the average household with children in Riverside County. In addition, the approach assumes that all children would be enrolled in either the NUSD or the MVUSD, when under more realistic circumstances, the enrollment would be distributed between the two school districts.</p>	<p>Please revise the approach to estimating the number of children that could temporarily enter the local school system by estimating the most-likely scenario. Specifically, SCE would like to suggest that each crewmember be considered representative of the average household in Riverside County and not the average household with children.</p> <p>Based on this approach, footnote "2" would be rewritten to read as follows:</p> <p>In Riverside County in 2010, <u>there were 800,707 individual 257,077 households had children under the age of 18</u>, and the total county population of children under the age of 18 was 620,108 (U.S. Census Bureau, 2010). This gives a rough average of 0.8 2-4 children per household with children present. Assuming each of the 40 temporary construction workers represented one average household in Riverside County with children, this could result in an increase of <u>31 96</u> children in the service areas of either <u>both the NUSD or MVUSD combined</u>.</p> <p>For basis of the CEQA analysis, this approach would provide the public with a more realistic potential impact to the local school system, rather than an outcome with a very low potential of representing the true project impact.</p> <p>SCE would also request that the information presenting in the revised footnote "2" be incorporated into the supporting text described under section a.iii) Schools.</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
341.	Chapter 4.15	4.15-7	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a.iv) Parks, the construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in substantial population increases and would not result in increased usage impacts on recreational facilities. No impacts would occur.</p>	
342.	Chapter 4.15	4.15-7	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a.v) Other Public Facilities, the construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in substantial population increases and would not result in increased public facility usage. No impacts would occur.</p>	
343.	Chapter 4.15	4.15-8	<p>Under the heading Alternative 1: Phased Construction Alternative, as previously explained by SCE, the phased construction alternative would extend the construction period by 12 months.</p>	<p>Please revise as follows: "The effects of Alternative 1 on utilities and service systems would be the same as for the Project because although it would increase the construction period by 10 <u>12</u> months, ..."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
344.	Chapter 4.16	4.16-1	<p>Under the heading 4.16.I Environmental Setting, the following sentence does not accurately reflect the scope of the project that would be constructed within the City of Moreno Valley:</p> <p>“The portion of the Project that would be located in the City of Moreno Valley would be constructed inside the existing substation fence/line on land currently used by SCE for industrial purposes.”</p>	<p>Please revise as follows: “The portion of the Project that would be located in the City of Moreno Valley would be constructed inside the existing substation fence/line and on roadways en-lane currently used by SCE for industrial purposes.”</p>
345.	Chapter 4.16	4.16-2	<p>Regarding Figure 4.16-1 Parks and Recreation Areas in the Project Vicinity, please remove Fiber Optic Cable Route 3 from the figure for the reasons explained in SCE’s accompanying cover letter.</p>	
346.	Chapter 4.16	4.16-3	<p>Under the heading Trails, please remove the reference to Fiber Optic Route 3 for the reasons explained in SCE’s accompanying cover letter.</p>	<p>Please revise as follows: “The proposed Fiber Optic Cable Route 3 would cross the historic corridor of the Juan Bautista de Anza National Trail; however, the portion of this trail that is within the Project vicinity is not currently maintained as a formal recreational trail.”</p>
347.	Chapter 4.16	4.16-4	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that accelerated, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in demand for recreational facilities, typically associated with population increases. No impacts would occur.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
348.	Chapter 4.16	4.16-5	Under the heading Impact 4.16-1 , please remove references to the work associated with Fiber Optic Cable 3 for the reasons explained in SCE's accompanying cover letter.	Please revise as follows: "The Project could contribute to or accelerate the substantial physical deterioration of existing facilities by constructing within and adjacent to these facilities. The proposed Fiber Optic Cable Route 3 would traverse SIWA and the Juan Bautista de Anza National Trail. The fiber optic cable would be strung along existing poles, and access roads at the base of the poles may need rehabilitation. Because these access roads are already present, and construction would be temporary, Project construction would not cause substantial deterioration of this facility and this impact would be less than significant."
349.	Chapter 4.16	4.16-5	Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows: Under CEQA criteria b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment , construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation does not include plans for additional recreational facilities and therefore would not result in adverse physical effects on the environment due to such development. No impacts would occur.	
350.	Chapter 4.16	4.16-5	Under the heading Impact 4.16-1 , please clarify the trail would only be closed intermittently and not during the entire duration of construction.	Please revise as follows: "At least six pull and tension sites would be located in proximity to the San Jacinto River (see Figure 2-2), which would require the trail to be closed intermittently during the construction activities (up to 12 months) ."
351.	Chapter 4.16	4.16-6	Under the heading Alternative 1: Phased Construction Alternative , please clarify the trail would only be closed intermittently and not during the entire duration of construction.	Please revise to: Alternative 1 could result in a longer-term (i.e., an additional 40 12 months) <u>intermittent</u> closure of the informal trail along the San Jacinto River than the Project.

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
352.	Chapter 4.17	4.17-2	Under the heading Reservoir Avenue, 10th Street, and 11th Street , it should be noted that portions of each of the abovementioned roadways are undeveloped; as currently drafted the section gives the impressions that these are existing roadways.	Please revise as follows: “Reservoir Avenue, 10 th Street and 11 th Street are two-lane Riverside County roads in the community of Lakeview. Portions of these roadways are currently undeveloped, however their future ultimate widths and expansions can be seen in the Riverside County General Plan.”
353.	Chapter 4.17	4.17-2	Under the heading Reservoir Avenue, 10th Street, and 11th Street , please clarify this access point will also be used to access the Subtransmission Source Line Segment One.	Please revise as follows: “The intersection of Lakeview Avenue and 10 th Street would be the primary access point for construction traffic that would access the proposed Lakeview Substation site <u>and the Subtransmission Source Line Segment One</u> . At that intersection, both streets are two-lane, undivided paved roads. Access to Subtransmission Source Line Segment Two and corresponding access roads would be achieved via <u>11th Street or Lakeview Avenue or Reservoir and 10th Street.</u> ”

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
354.	Chapter 4.17	4.17-2	Under the heading Moreno Beach Drive , please remove the references related to Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter, and replace with description of John F Kennedy Drive, the roadway adjacent to the underground fiber-optic cable installation at Alessandro Substation.	<p>Please revise as follows: <u>Moreno Beach Drive</u> Moreno Beach Drive is a north-south road that extends from Leeust Avenue to Via Del Lago in the City of Moreno Valley. It would be used to access the Fiber-Optic Cable Route 3. Between Via Del Lago and Brodiaea Avenue, Moreno Beach Drive is a six-lane divided road with bicycle lanes and sidewalks on both sides of the road. Between Brodiaea Avenue and Alessandro Boulevard, the road narrows to two lanes with no sidewalks. The east side of this portion of the road has a narrow shoulder and in some places a soft-shoulder only. Fiber-Optic Cable Route Three would be installed within the east side of Moreno Beach Drive from a location near the existing Movat Substation to a location approximately 200 feet south of Alessandro Boulevard. In 2006, Moreno Beach Drive south of Alessandro Boulevard had an ADT level of 14,000 vehicles (City of Moreno Valley, 2006b).</p> <p><u>John F. Kennedy Drive</u> John F. Kennedy Drive is a north-south road that extends from Heacock Street to Lasselle Street in the City of Moreno Valley. It would be used to access the underground fiber-optic cable installation within and adjacent to Alessandro Substation. The proposed work at Alessandro Substation is adjacent to the intersection of John F. Kennedy Drive and Kitching Street. The primary access point for construction traffic would be John F. Kennedy Drive. Traffic counts for the section of John F. Kennedy Drive are not available (City of Moreno Valley, 2006b).</p>
355.	Chapter 4.17	4.17-3	Regarding the discussion of Davis Road and Brodiaea Avenue , please remove the section as it is related to Davis Road and Brodiaea Avenue as they are no longer roadways within the Project Study Area due to the removal of Fiber-Optic Route 3.	<p>Please revise as follows: <u>Davis Road and Brodiaea Avenue</u> Davis Road and Brodiaea Avenue would also be used to access the Fiber-Optic Cable Route Three construction sites within Moreno Valley. In 2006, Davis Road had an ADT level of 200 vehicles south of Alessandro Boulevard. Traffic counts for the section of Brodiaea Avenue in the vicinity of Moreno Beach Drive are not available (City of Moreno Valley, 2006b)."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
356.	Chapter 4.17	4.17-3	Under the heading Airports , the discussion should be revised to reflect the proximity of March AFB related to fiber-optic cable installation at Alessandro Substation.	Please revise as follows: "No airports are in the immediate vicinity of the Project area. Perris Valley Airport, a commercial airstrip, is located approximately 6 miles southwest of the proposed Lakeview Substation site and March AFB is approximately 7.5 miles southwest of the underground fiber-optic cable installation at Alessandro Substation Fiber-Optic Cable Route Three in Moreno Valley."
357.	Chapter 4.17	4.17-3	Regarding Figure 4.16-1 , please indicate the correct designation of the trail along the San Jacinto River.	Revise to: "...however, there is an <u>Class I Bike Path</u> and informal trail along the San Jacinto River....."
358.	Chapter 4.17	4.17-4	Under the heading River County Ordinance No. 499 , please clarify that SCE is only required to obtain ministerial permits from local agencies.	Please revise as follows: "Ordinance No. 499 gives the County of Riverside Transportation Department the authority to require ministerial permits to be obtained for any type of work conducted within a County road ROW..."
359.	Chapter 4.17	4.17-6	Under the heading Construction Easement Requirements , please clarify easement rights would also be required from private property owners. Additionally, please remove the references related to work associated with Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter, and replace with a description of roadways in proximity to fiber-optic cable installation within and adjacent to Alessandro Substation.	Please revise as follows: "The portions of the proposed subtransmission source line segments along 10th and 11th streets would be constructed within planned or existing unpaired County road ROWs and would require easement rights from private property owners and encroachment permits from the county. Portions of the fiber-optic cable routes would be installed underground within 10th Street, Kitching Street, and John F. Kennedy Drive and Moreno Beach Drive , which are county and City of Moreno Valley paved roadways respectively. The overhead portions of the fiber-optic cable routes would be strung on existing poles along Lakeview Avenue, Davis Road, Brodiea Avenue, and Moreno Beach Drive "

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
360.	Chapter 4.17	4.17-7	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Conflict 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 including mass transit and non motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in significant increases in vehicle miles traveled. Impacts would be less than significant.</p>	
361.	Chapter 4.17	4.17-8	Under the heading Impact 4.17-1 (Construction) , please note the portion of 11 th Street west of Lakeview is not paved.	Please revise as follows: "Construction personnel could use additional local paved roads, such as 11 th Street to access the Subtransmission Source Line Segment Two."
362.	Chapter 4.17	4.17-8	Under the heading Impact 4.17-1 (Construction) , please clarify the trail would only be closed intermittently.	Please revise as follows: "At least six pull and tension sites would be located in proximity to the San Jacinto River (see Figure 2-2), which could require the informal trail to be closed intermittently during construction activities, resulting in a potential significant impact to trail users lasting approximately 1 week."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
363.	Chapter 4.17	4.17-8	Under the heading Impact 4.17-1 (Construction) , please remove the references related to work associated with Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter, and replace with relevant roadways within proximity of the underground fiber-optic cable installation at Alessandro Substation.	Please revise as follows: "During installation of the duct banks for the fiber-optic cable in 10 th Street from the Lakeview Substation site to Lakeview Avenue, and in Kitching Street between Margaret Avenue and Delphenium Avenue and in Moreno Beach Drive between Brediaa Avenue and Meval Substation , travel corridors would be restricted..." "Additionally, during line stringing for aboveground portions of the fiber-optic routes, the Project may result in similar temporary traffic delays along Brediaa Avenue, Davis Road, Lakeview Avenue, 9th Street, and Reservoir Avenue. "
364.	Chapter 4.17	4.17-9	Under the heading Impact 4.17-2 (Operation) , please clarify that either aerial or ground observation may be done on alternate years.	Please revise as follows: "SCE maintains an inspection frequency of its overhead energized subtransmission lines of a minimum of once per year via ground and/or aerial observation <u>on alternate years.</u> "

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
365.	Chapter 4.17	4.17-9	<p>Regarding Mitigation Measure 4.17-1, the fourth bullet point requires SCE to provide local residences with notification related to construction schedules, duration of activities with specifics related to street name, date of closure, etc. Such notification could be problematic as field conditions and contractor availability could require shifts in the construction schedule that would not be captured by the notifications sent to property owners. The requirement to notice in an effort to minimize potential temporary impacts related to construction are not warranted as the remaining bullet points would sufficiently mitigate the potential impacts.</p> <p>Additionally, SCE commonly provides courtesy notifications to local property owners in the vicinity of construction activities which do not include the specificity being required by bullet point number 4 but would alert residents of the activities and what to generally expect during SCE's construction efforts.</p>	<p>Please revise as follows: "Mitigation Measure 4.17-1: SCE shall prepare and implement a Traffic Management Plan subject to approval of the appropriate state agency and/or local government(s). The approved Traffic Management Plan and documentation of agency approvals shall be submitted to the CPUC prior to the commencement of construction activities. The plan shall:</p> <ul style="list-style-type: none"> □ Include a discussion of work hours, haul routes, work area delineation, traffic control and flagging; □ Identify all access and parking restriction and signage requirements; □ Require workers to park personal vehicles at the approved staging area and take only necessary Project vehicles to the work sites; □ Lay out plans for notifications and a process for communication with affected residents and landowners prior to the start of construction. Advance public notification shall include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which road/lanes and access point/driveways would be blocked on which days and for how long), and a toll free telephone number for receiving questions or complaints; □ Include plans to coordinate all construction activities with emergency service providers in the area. Emergency service providers would be notified of the timing, location, and duration of construction activities. All roads would remain passable to emergency service vehicles at all times; and □ Identify all roadway locations where special construction techniques (e.g., night construction) would be used to minimize impacts to traffic flow."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
366.	Chapter 4.17	4.17-10	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would temporarily increase traffic congestion by reducing the number of traffic lanes through construction sites, which would limit passage to controlled escort, or imposing detours around construction areas. It is estimated that short-term construction impacts would add 100 vehicle ADTs, which would not cause levels of service on local roadways to decline below acceptable thresholds. Therefore, impacts related to construction would be less than significant.</p>	
367.	Chapter 4.17	4.17-10	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that would result in substantial safety risks, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not change air traffic patterns and would not require the use of helicopters or other aircraft. Air traffic patterns would not be impacted based on the underground nature of fiber-optic cable installation at Alessandro Substation.</p> <p>Therefore, no impacts would occur related to air traffic patterns (No Impact).</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
368.	Chapter 4.17	4.17-11	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation do not include design features that would increase hazards or create incompatible use with transportation and traffic. Therefore, no impacts would occur related to increased hazards (No Impact).</p>	
369.	Chapter 4.17	4.17-11	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) Result in inadequate emergency access, construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would have temporary impacts on traffic flow during roadway trench work. However, implementation of Mitigation Measure 4.17-4 will ensure that impacts are reduced and avoided through consultation with local emergency service providers.</p> <p>Impacts would be less than significant with mitigation. No additional traffic flow impacts would result from limited VMT resulting from worker trips for operation and maintenance. No impact.</p>	
370.	Chapter 4.17	4.17-11	<p>Under the heading Impact 4.17-4, please remove the references related to work associated with Fiber Optic Cable Route 3 for the reasons described in SCE's accompanying cover letter and update the text to reference the work associated with Alessandro Substation.</p>	<p>Please revise as follows: "In Moreno Valley, Moreno Beach Drive and Bredia Avenue-John F. Kennedy Drive and Kitching Street serve as access routes to residences located along both roads."</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT

SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
371.	Chapter 4.17	4.17-11	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under the CEQA criteria, f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, construction, operation, and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in a substantial increase in VMT; therefore, the proposed components would not conflict with policies, plans or programs. No impact would occur.</p>	
372.	Chapter 4.17	4.17-12	<p>Under the heading Alternative 1: Phased Construction Alternative, as previously explained to the CPUC the construction duration for phased construction would actually be extended to 12 months not 10 months.</p>	<p>Please revise as follows: "Alternative 1 would extend the construction period by 40 <u>12</u> months."</p>
373.	Chapter 4.17	4.17-12	<p>Under the heading Alternative 2: Relocated Substation Alternatives, please revise Avenue A to A Avenue.</p>	<p>Please revise as follows: "...would instead occur along <u>A Avenue-A</u>..."</p>
374.	Chapter 4.18	4.18-4	<p>Under the heading Riverside Countywide Integrated Waste Management Plan, there is a reference to Riverside County, 2008, which is missing from the reference section on page 4.18-10.</p>	<p>Please add the reference for Riverside County, 2008 under the heading References – Utilities and Service Systems (p.4.18-10).</p>

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
375.	Chapter 4.18	4.18-5	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would include use of a portable toilet, consistent with other construction activities. The use of portable toilets during construction would not result in wastewater discharge on-site, and their maintenance would not exceed applicable wastewater treatment requirements of the SARWQCB. No impacts would result. No additional impacts would result during operation and maintenance.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
376.	Chapter 4.18	4.18-6	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, water use during construction associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not exceed the existing capacities of water treatment plants serving the Project area. In addition, construction, operation and maintenance would not discharge large volumes of wastewater that would exceed the existing capacities of wastewater treatment plants serving the Project area. Therefore, proposed construction, operation and maintenance of the installed telecommunication system within and adjacent to Alessandro Substation would not require the expansion or construction of water or wastewater treatment facilities. This impact would be less than significant.</p>	
377.	Chapter 4.18	4.18-6	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria c) Require or result in the construction of new storm water drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects, construction, operation and maintenance associated with underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not introduce new impervious surfaces. No impacts would result.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
378.	Chapter 4.18	4.18-6	Under the heading Impact 4.18-1 , SCE has reviewed the context in which the CPUC has referenced the 32,000 gallons of water estimate and revised the number to be encompassing of all construction related components.	Please revise as follows: "During construction, dust suppression, site clean-up, drinking, and hand washing would require <u>approximately 32,000- 62,000</u> gallons of water per day."
379.	Chapter 4.18	4.18-7	Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows: Under CEQA criteria d) Require new or expanded water supply resources or entitlements , water use associated with construction, operation and maintenance underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in a need for new or expanded water entitlements or resources and would have a less than significant impact on the water supply in the area.	
380.	Chapter 4.18	4.18-7	Under the heading Impact 4.18-2 , SCE has reviewed the context in which the CPUC has referenced the 32,000 gallons of water estimate and revised the number to be encompassing of all construction related components.	Please revise as follows: "Project construction would use approximately 32,000 <u>62,000</u> gallons of water per day for dust suppression, site clean-up, drinking, and hand washing. This water would be delivered to the site by water trucks approximately eight <u>20</u> times per day (SCE, 2011a)."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
381.	Chapter 4.18	4.18-7	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria e) Result in a determination by the wastewater treatment provider that would serve the project that it does not have adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments, construction, operation, and maintenance of underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not result in discharges of wastewater to a wastewater treatment facility that would exceed its capacity. No impacts would result.</p>	
382.	Chapter 4.18	4.18-8	<p>Under the heading Impact 4.18-3, please clarify that collection and separation of waste may also be done at the proposed marshalling yards.</p>	<p>Please revise as follows: “Construction crews would collect and separate waste items and materials into roll-off boxes at the materials staging area and/or marshalling yards. Many of these materials could be recycled or salvaged for reuse.”</p>
383.	Chapter 4.18	4.18-8	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria f) Be served by a landfill without sufficient permitted capacity to accommodate the project’s solid waste disposal needs, construction, operation, and maintenance of underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not generate sufficient waste to exceed the permitted capacity of the landfills in the area. No impacts would result.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
384.	Chapter 4.18	4.18-8	<p>Analysis for Telecommunications work associated with the new scope of work at Alessandro Substation (in lieu of Fiber Optic Cable Route 3) is as follows:</p> <p>Under CEQA criteria g) Comply with federal, state, and local statutes and regulations related to solid waste, construction, operation, and maintenance of underground fiber-optic cable and conduit installation within and adjacent to Alessandro Substation would not generate sufficient solid wastes subject to federal, state or local statutes or regulations. No impacts would result.</p>	
385.	Chapter 4.18	4.18-9	<p>Under the heading Alternative 1: Phased Construction Alternative, as previously explained by SCE, the phased construction alternative would extend the construction period by 12 months.</p>	<p>Please revise as follows: "The effects of Alternative 1 on utilities and service systems would be the same as for the Project because although it would increase the construction period by 10 <u>12</u> months, ..."</p>
386.	Chapter 4.18	4.18-9	<p>Under the heading Alternative 2: Relocated Substation Alternative, please correct the length of the subtransmission source line.</p>	<p>Please revise as follows: "Because it would result in several thousand fewer <u>1,320</u> fewer feet of subtransmission source line construction and road work..."</p>
387.	Chapter 5	5-4	<p>Under the heading 5.3 Environmentally Superior Alternative, as explained in SCE's accompanying cover letter, the 12 kV distribution line from Nuevo Substation to Bunker Substation is no longer needed. Additionally, as explained in SCE's accompanying cover letter, Alternative 1: Phased Construction, would pose practical and economic constraints that do not meet the CEQA guidelines feasibility criteria. Based on the information in SCE's accompanying cover letter it is suggested that the rationale for the Environmentally Superior Alternative be updated and conclude that SCE's proposed project is still preferred to Alternative 1.</p>	

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
388.	Chapter 5	5-7	Regarding Table 5-2 Proposed Project vs. Alternatives , the discussion for Alternative 1 as it relates to Geology, Soils, Seismicity and Mineral Resources, is inconsistent with the information provide in Chapter 4.7.	Please revise as follows: "The potential for construction related impacts from erosion and soil loss would be slightly reduced increased, but remain less than significant. All other impacts would be the same as the project" "Slightly Preferred Less Preferable "
389.	Chapter 6	6-5	Regarding Figure 6-1 Cumulative Projects , for the reasons described in SCE's accompanying cover letter, please remove Fiber Optic Cable Route 3 from the figure.	
390.	Chapter 6	6-9	Under the heading 6.2.2 Agriculture and Forestry Resources , the text references the project would be converting approximately 9.9 acres of Farmland which is inconsistent with the conversion acreage represented in Chapter 4.2. Agriculture and Forestry Resources. As previously commented in the resource sections, please verify the conversion figures provided in the table and the text are accurate.	
391.	Chapter 6	6-10	Under the heading 6.2.4 Biological Resources , for the reasons described in SCE's accompanying cover letter, please remove references to Fiber Optic Cable Route 3.	Please revise as follows: "The Project has the potential to permanently impact special-status plants and animals through habitat loss or the direct loss of known populations/individuals along Fiber Optic Cable Route 3 and the Subtransmission Source Line Segments 1.
392.	Chapter 6	6-11	Under the heading 6.2.4 Biological Resources , for consistency with the edits previously provided for APM Bio-6 please update the text to reference SCE would participate in the MSHCP.	Please revise as follows: "SCE would avoid or participate in the MSHCP prepare a mitigation plan to be reviewed by appropriate agencies for native or special status vegetation and special status plant populations (APM-BIO-6); avoidance would be likely"
393.	Chapter 6	6-15	Under the heading 6.2.9 Hazards and Hazardous Materials , for the reasons described in SCE's accompanying cover letter, please remove references to Fiber Optic Cable Route 3.	Please revise as follows: "Mitigation measures would reduce impacts related to wildland fires in the high fire areas located along Fiber Optic Cable Route 3."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
394.	Chapter 6	6-19	Under the heading 6.2.17 Transportation and Traffic , for the reasons described in SCE's accompanying cover letter, please remove references associated with Fiber Optic Cable Route 3.	Please revise as follows: "...increased congestion or lane closure (e.g. 10 th street, 11 th street, Lakeview Avenue, Reservoir Avenue, Merete Beach Drive)"
395.	Chapter 9	9-4	Under the heading California Public Utilities Commission – MMRCP Authority , the reference to the transmission line is should be corrected to subtransmission line.	Please revise as follows: "Though other state and local agencies would have permit and approval authority over construction of the subtransmission line, the CPUC would continue to act as the lead agency for monitoring compliance with all mitigation measures required by the EJR."
396.	Chapter 9	9-4	Under the heading California Public Utilities Commission – MMRCP Authority , for consistency purposes, please clarify Model Pole Top is a temporary substation, as stated in SCE's PEA.	Please revise to: "The activities considered include the construction and operation of the new Lakeview Substations, subtransmission source line segments, distribution getaways, telecommunications facilities, and the decommissioning of the existing Nuevo Substation and <u>temporary Model Pole Top Substations.</u> "
397.	Chapter 9	9-9	Under the heading Mitigation Monitoring, Reporting and Compliance Program regarding APM-Bio-3: Stephen's Kangaroo Rat, please revise the APM to accurately reflect the habitat assessment work conducted for Stephen's kangaroo rat surveys for the Proposed Project.	Please revise as follows: "A habitat assessment for Stephens' kangaroo rat shall be <u>was</u> conducted by a biologist qualified to conduct Stephen's kangaroo rat surveys along Segment 1, 2 and 3 and the Proposed Telecommunications Route for the entire Proposed Project. Protocol level trapping was conducted along <u>Subtransmission Segments One and Two</u> . Stephens' kangaroo rat was detected along <u>Segment One</u> . The Proposed Project is in a Stephens' kangaroo rat fee area; therefore, to mitigate for potential impacts to this species, SCE will pay a fee in coordination with the <u>Regional Habitat Conservation Authority</u> . If <u>no potential occupied habitat is found during this assessment, then no further action is necessary</u> . If potential for occupied habitat is found, <u>protocol trapping surveys shall be conducted</u> . The Proposed Telecommunications Route is within a Stephens' kangaroo rat fee area; therefore, if suitable habitat for this species is found, a fee shall be paid in lieu of further surveys (County of Riverside, 1996)."

LAKEVIEW DRAFT ENVIRONMENTAL IMPACT REPORT
SCE COMMENTS & SUGGESTED REVISIONS

Comment	Section	Page	Comment	Suggested Revision
398.	Chapter 9	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 MMRCF and anywhere else in the DEIR that the mitigation measures appear.	

Table 52
Fugitive Dust Emission Factors
Soil Dropping During Excavation

Emission Factor [lb/cu. yd] = $0.0011 \times (\text{mean wind speed [mi/hr]} / 5)^{1.3} / (\text{moisture [\%]} / 2)^{1.4} \times (\text{number drops per ton}) \times (\text{density [ton/cu. yd]})$
 Reference: AP-42, Equation (1), Section 13.2.4, November 2006

Parameter	Value	Basis
Mean Wind Speed	12	SCAQMD CEQA Air Quality Handbook (1993), Table 9-9-G, default
Moisture	10.6	Preliminary geotechnical investigation of substation site
Number Drops	4	Assumption
Soil Density	1.215	Table 2.46, Handbook of Solid Waste Management

PM10 Emission Factor (Uncontrolled) 1.62E-03 lb/cu. yd
 Reduction from Watering Twice/Day^b 0%
 Controlled PM10 Emission Factor 1.62E-03 lb/cu. yd
 Controlled PM2.5 Emission Factor^a 3.36E-04 lb/cu. yd

^a PM2.5 emission factor [lb/hr] = PM10 emission factor [lb/hr] x PM2.5 fraction of PM10
 PM2.5 Fraction of PM10 in Construction Dust = 0.208 from Appendix A, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, SCAQMD, October 2006

^b Watering is assumed to be used to maintain moist conditions, so no further reduction from watering is included.

Emissions [pounds per day] = Controlled emission factor [pounds per cubic yard] x Volume soil handled [cubic yards per day]

Storage Pile Wind Erosion

Emission Factor [lb/day-acre] = $0.85 \times (\text{silt content [\%]} / 1.5) \times (365 / 235) \times (\text{percentage of time unobstructed wind exceeds 12 mph} / 15)$
 Reference: SCAQMD CEQA Air Quality Handbook (1993), Table 9-9-E

Parameter	Value	Basis
Silt Content	26.7	Preliminary geotechnical investigation of substation site
Pct. time wind > 12 mph	100	Worst-case assumption

PM10 Emission Factor (Uncontrolled) 156.7 lb/day-acre
 Reduction from Watering Twice/Day 90% Control efficiency from watering storage pile by hand at a rate of 1.4 gallons/hour-yard², Table XI-B, Mitigation Measure Examples, Fugitive Dust from Materials Handling, http://www.aqmd.gov/ceqa/handbook/mitigation/fugitive/MM_fugitive.html
 Controlled PM10 Emission Factor 15.7 lb/day-acre
 Controlled PM2.5 Emission Factor^a 3.3 lb/day-acre

^a PM2.5 emission factor [lb/hr] = PM10 emission factor [lb/hr] x PM2.5 fraction of PM10
 PM2.5 Fraction of PM10 in Construction Dust = 0.208 from Appendix A, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, SCAQMD, October 2006

Emissions [pounds per day] = Controlled emission factor [pounds per acre-day] x Storage pile surface area [acres]

Bulldozing, Scraping and Grading

Emission Factor [lb/hr] = $0.75 \times (\text{silt content [\%]} / 1.5) / (\text{moisture [\%]} / 2)^{1.4}$
 Reference: AP-42, Table 11.9-1, July 1998

Parameter	Value	Basis
Silt Content	26.7	Preliminary geotechnical investigation of substation site
Moisture	10.6	Preliminary geotechnical investigation of substation site

PM10 Emission Factor (Uncontrolled) 3.797 lb/hr
 Reduction from Watering Twice/Day 61% Control efficiency from watering three times per day, Table XI-A, Mitigation Measure Examples, Fugitive Dust from Construction & Demolition, http://www.aqmd.gov/ceqa/handbook/mitigation/fugitive/MM_fugitive.html
 Controlled PM10 Emission Factor 1.481 lb/hr
 Controlled PM2.5 Emission Factor^a 0.308 lb/hr

^a PM2.5 emission factor [lb/hr] = PM10 emission factor [lb/hr] x PM2.5 fraction of PM10
 PM2.5 Fraction of PM10 in Construction Dust = 0.208 from Appendix A, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, SCAQMD, October 2006

^b Watering is assumed to be used to maintain moist conditions, so no further reduction from watering is included.

Emissions [pounds per day] = Controlled emission factor [pounds per hour] x Bulldozing, scraping or grading time [hours/day]

