



SOUTHERN CALIFORNIA
EDISON

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June 14, 2011

VIA EMAIL

Mr. Iain Fisher
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

SUBJECT: Southern California Edison's Lockhart Substation Project (CPUC A.11-05-006)
Draft Initial Study / Mitigated Negative Declaration

Dear Mr. Fisher:

Enclosed please find Southern California Edison's (SCE) comments on the Draft Initial Study / Mitigated Negative Declaration (Draft IS/MND) for the Lockhart Substation Project. SCE's comments are provided in table format that lists the section number, page number, text reference and suggested revisions.

SCE appreciates your time and attention in addressing its comments on the Draft IS/MND. If there are any questions, please don't hesitate to give me a call at (626) 302-3613.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Stevenson'.

Ryan Stevenson
Regulatory Affairs

Enclosure

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No.	Section	Page	Draft MND Text Reference	Comments
1.	ES.6	ES-6	<ul style="list-style-type: none"> • Generation Tie Line Connections:Mojave Solar-owned tower(\$). 	There will be one double-circuit tower.
2.	ES.6	ES-6	<ul style="list-style-type: none"> • Transmission Lines: Loop the...3,000 feet of new transmission line segments (parallel lines; each approximately 1,500 feet) 	The loop-in lines are not parallel.
3.	ES.8, Table ES-1; 3.4.4; Appendix B, Table B-3	ES-8,9; 3.4-24,25; B-63,64	Mitigation Measure CPUC-BIO-1:	It seems that the requirements within this mitigation measure are stated differently in the Executive Summary and in the MMRCF than what's included in the Biological Resources Section. Please confirm the appropriate mitigation measure requirements.
4.	ES.8, Table ES-1	ES-8	Mitigation Measure CPUC-BIO-1: Floristic surveys shall be conducted along downstream SPS upgrades in accordance with CDFG Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFG, 2009).	The introduction for this mitigation measure is the same throughout the document. Please change "downstream" to "SPS" for clarification purposes.
5.	3.4.4	3.4-24	Mitigation Measure CPUC-BIO-1: b. The Designated Biologist shall establish Environmentally Sensitive Areas around rare plant occurrences at a minimum of 20 feet from the uphill side of a rare plant occurrence and 10 feet from the downhill side where practicable. Equipment and vehicle maintenance areas, and wash areas, shall be located 100 feet from any occurrences.	Add "where practicable" at the end of the first sentence within part b of this mitigation measure as stated in the Biological Resources Section (3.4.4).
6.	2.7.1.2	2-14the installation of a temporary chain-link fence surrounding the substation construction site.	SCE responsibility clarified.

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7.	3.9.4.c	3.9-7	The existing transmission line spans the Mojave River and there would be no construction activities or that would cause additional impacts within the floodplain associated with the telecommunication system.	There will be construction in the Mojave River. A pole will be walked to and climbed that is in the river.
8.	2.4.1	2-6	There would be one back-up generator.	There will not be a backup generator so this reference can be removed.
9.	2.7.1.3	2-16,17	EQUIPMENT AND WORKFORCE ESTIMATES FOR LOCKHART AND TORTILLA SUBSTATIONS CONSTRUCTION	Refine Table 2.7-4 title for accuracy
10.	3.5.1	3.5-1	The cultural and paleontological resources setting is described in Section	The paragraph identifies cultural and paleontological discussions in other environmental documents.
11.	3.5.1	3.5-2	A Phase I archaeological study was and built-environment survey were conducted for the Project in <u>2006</u> and <u>updated</u> in <u>2009</u> and <u>2010</u> . The built environment survey was conducted in <u>2009</u> and <u>2010</u> .	Per the DOE EA and the draft cultural resources report by AECOM (Wilson 2010 et al), the original records search was done in 2006 with an update in 2009 and 2010 for the telecom upgrades. The archaeological surveys were in 2009 and 2010 as were the built environment surveys.
12.	3.5.1	3.5-2	Two Three responses were received: one from the Kern Valley Indian Council, one from the San Manuel Band of Mission Indians and one the other from a representative affiliated with the Tebatulabal, Kawaiisu, Koso, and Yokut tribes. However, the results of these efforts did not identify any sacred resources or areas of concern (CEC SA, p.5.3-15; CEC Commission Decision, p. 405, and <u>DOE EA 3.9-5</u>).	Per the DOE EA, a second round of consultation letters was sent out to tribal members in Sept 2010. San Manuel responded and consulted with BLM at that time.
13.	3.5.1	3.5-2	As a result of archival research and pedestrian surveys, 88 <u>87</u> cultural resources were recorded within the Project area.	Per the AECOM cultural resources report, Table 10 (Wilson et al 2010), the numbers are slightly different. Please verify.
14.	3.5.1	3.5-2	An additional 125-127 isolated artifacts were recorded during survey...	Per the AECOM cultural resources report, table 10 (Wilson et al 2010), the numbers are slightly

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15.	3.5.1	3.5-3	<p>This study included a records search at the San Bernardino County Museum; <u>and</u> a review of literature and geologic maps; <u>and a pedestrian paleontological survey</u> of the Project area.</p>	<p>different. Please verify.</p> <p>Although the DOE EA states on page 3.6-1 that “The assessments were based on a comprehensive literature review, museum records search, and fieldwork for the AMSP/Lockhart Substation and telecommunication system.”, the paleontological report cited actually states that “the scope of services for the current study included a comprehensive museum records search and literature review and preparation of this technical report of findings that includes recommended mitigation measures” (SWCA 2010:i).</p>
16.	3.5.1	3.5-3	<p>Eighteen previously recorded vertebrate fossil localities were identified within the Lockhart Substation site <u>Project area</u>.</p>	<p>Although the DOE EA states on page 3.6-5, “A review of the Regional Paleontologic Locality Inventory maintained by the San Bernardino County Museum revealed that 18 vertebrate localities have been previously recorded and collected during a prior mitigation project within the AMSP/Lockhart Substation area.” This is incorrect. According to the paleontological study in Appendix L of the DOE EA, “A review of the Regional Paleontologic Locality Inventory maintained by the San Bernardino County Museum revealed that 18 vertebrate localities have been previously recorded and collected during a prior mitigation project within the project area”. Figures 6 & 7 of the same report show that the localities are along the Kramer-Victor telecom line. Additionally in the CEC’s Commission Decision page 424 states, “There are no known paleontological resources on the project site.”</p>

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17.	3.5.4	3.5-7	Two paleontologically sensitive geologic formations (older Quaternary Alluvium and younger Quaternary Alluvium at depth) underlie portions of the Lockhart Substation project area. Eighteen possible vertebrate fossil localities have been identified within the AMSP site, in the vicinity of the Lockhart Substation site, at depths of 3-14 feet below ground surface.	i.e. the Lockhart Substation. The Paleontological study (SWCA 2010) does not identify these soils as being under the substation, gentle and distribution. See Figures 2-4. This sentence should be removed and the paragraphs that also state this should be edited in light of this.
18.	3.5.4	3.5-9	Two One paleontologically sensitive geologic formations (older Quaternary Alluvium and younger Quaternary Alluvium at depth) underlies portions of the Project area transmission line. No fossils were found within the transmission line and related structures project areas. Eighteen possible vertebrate fossil localities have been identified within the AMSP site at depths of 3-14 feet below ground surface (DOE EA, p.3.6-5). Paleontological resources could be impacted as a result of excavation related to the construction of the transmission lines and related structures (at depth).	The Paleontological study (SWCA 2010) only identifies one sensitive paleontological formation as being under the transmission line and related structures. See Figure 2 of the SWCA 2010 report.
19.	3.5.4	3.5-11	Two One paleontologically sensitive geologic formations (older Quaternary Alluvium and younger Quaternary Alluvium at depth) underlies portions of the Lockhart-to-Kramer fiber optic corridor (DOE EA, p. 3.6-6).	The Paleontological study (SWCA 2010) only identifies one sensitive paleontological formation as being under the Lockhart-Kramer fiber optic corridor See Figures 2-4 of the SCA 2010 report.
20.	3.5.4	3.5-13	Two paleontologically sensitive geologic formations (older Quaternary Alluvium and younger Quaternary Alluvium at depth) underlie portions of the AMSP boundary. Eighteen possible vertebrate fossil localities have been identified within the AMSP site at depths of 3-14 feet below ground surface (CEC Commission Decision, p. 3.6-5).	The Paleontological study (SWCA 2010) does not identify these soils as being under the telecommunications route from Lockhart to the Alpha and Beta Switchyards. See Figure 2-4 of the SWCA 2010 report. This sentence should be removed and the paragraphs that also state this should be edited in light of this.