<table>
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<tr>
<th>Comment Set</th>
<th>Agency/Affiliation</th>
<th>Name / Title of Commenter</th>
<th>Date of Comment</th>
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<tbody>
<tr>
<td>A.1</td>
<td>Antelope Valley Air Quality Management District</td>
<td>Alan J. De Salvio, Supervising Air Quality Engineer</td>
<td>02/25/09</td>
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<td>A.2</td>
<td>City of Palmdale</td>
<td>Asoka Herath, Director of Planning</td>
<td>03/06/09</td>
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<td>A.3</td>
<td>John A. Rowland High School</td>
<td>Robert S. Withers, Assistant Principal</td>
<td>03/11/09</td>
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<tr>
<td>A.4</td>
<td>South Coast Air Quality Management District</td>
<td>Steve Smith, Program Supervisor CEQA Section, Planning, Rule Development and Area Sources</td>
<td>03/18/09</td>
</tr>
<tr>
<td>A.5</td>
<td>Department of Transportation, Division of Transportation Planning, MS-32</td>
<td>Gary S. Arnold, Statewide Local Development-Intergovernmental Review Coordinator, Office of Community Planning</td>
<td>03/16/09</td>
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<td>A.6</td>
<td>City of Brea</td>
<td>Charles View, Development Services Director</td>
<td>03/17/09</td>
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<tr>
<td>A.7</td>
<td>City of San Marino, Planning &amp; Building Department</td>
<td>Amanda Thorson, Planning &amp; Building Assistant</td>
<td>03/19/09</td>
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<tr>
<td>A.8</td>
<td>County of Los Angeles, Department of Public Works</td>
<td>Gail Farber, Director of Public Works, for Dennis Hunter, Assistant Deputy Director, Land Development Division</td>
<td>03/25/09</td>
</tr>
<tr>
<td>A.9</td>
<td>California Regional Water Quality Control Board, Santa Ana Region</td>
<td>Mark G. Adelson, Chief, Regional Planning Programs Section</td>
<td>04/01/09</td>
</tr>
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<td>A.10</td>
<td>City of Chino Hills Planning Commission</td>
<td>Karen S. Bristow</td>
<td>03/19/09</td>
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<td>A.11</td>
<td>City of Chino</td>
<td>Charles E. Coe, Director of Community Development</td>
<td>04/02/09</td>
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<td>A.12</td>
<td>City of Chino</td>
<td>Brent Arnold, City Planner</td>
<td>04/03/09</td>
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<td>A.13</td>
<td>CA Department of Parks and Recreation, Inland Empire District</td>
<td>Ron Krueper, District Superintendent</td>
<td>04/03/09</td>
</tr>
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<td>A.14</td>
<td>CA Department of Fish and Game, South Coast Region</td>
<td>Edmund J. Pert, Regional Manager</td>
<td>04/06/09</td>
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<td>A.15</td>
<td>County of Los Angeles, Chief Executive Office</td>
<td>William T. Fujioka, Chief Executive Officer</td>
<td>04/06/09</td>
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<td>A.16</td>
<td>Acton Town Council</td>
<td>Jacqueline Ayer</td>
<td>04/06/09</td>
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<td>A.17</td>
<td>Watershed Conservation Authority</td>
<td>Belinda V. Faustinos, Executive Officer</td>
<td>04/02/09</td>
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<tr>
<td>A.18</td>
<td>Puente Hills Landfill Native Habitat Preservation Authority</td>
<td>Bob Henderson, Chairman</td>
<td>04/02/09</td>
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<td>A.19</td>
<td>City of El Monte</td>
<td>Minh Thai, Planning Services Manager</td>
<td>04/06/09</td>
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<tr>
<td>A.20</td>
<td>City of La Habra Heights</td>
<td>Brian Bergman and Stan Carroll, Council Members</td>
<td>04/06/09</td>
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<td>A.21</td>
<td>City of Irwindale</td>
<td>Ray Hamada, Director of Planning &amp; Community Development</td>
<td>04/02/09</td>
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<tr>
<td>A.22</td>
<td>County Sanitation Districts of Los Angeles County</td>
<td>Debra Bogdanoff, Senior Engineer, Facilities Planning Department</td>
<td>04/06/09</td>
</tr>
<tr>
<td>A.23</td>
<td>City of Chino Hills</td>
<td>Jeanne B. Armstrong, Goodin, MacBride, Squeri, Day &amp; Lamprey, LLP (Attorneys for the City of Chino Hills)</td>
<td>04/06/09</td>
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<td>A.24</td>
<td>County of Los Angeles, Department of Public Works</td>
<td>Gail Farber, Director of Public Works, for Dennis Hunter, Assistant Deputy Director, Land Development Division</td>
<td>04/02/09</td>
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<td>A.25</td>
<td>California Regional Water Quality Control Board, Santa Ana Region</td>
<td>Glenn Robertson, Engineering Geologist / CEQA Coordinator</td>
<td>04/06/09</td>
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<tr>
<td>A.26</td>
<td>City of Ontario</td>
<td>Jerry L. Blum, Planning Director</td>
<td>04/06/09</td>
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<tr>
<td>A.27</td>
<td>U.S. Department of the Interior, Office of the Secretary, Office of Environmental Policy and Compliance, Pacific Southwest Region</td>
<td>Patricia Sanderson Port, Regional Environmental Officer</td>
<td>04/06/09</td>
</tr>
<tr>
<td>A.28</td>
<td>U.S. Environmental Protection Agency, Region IX</td>
<td>Kathleen M. Goforth, Manager, Environmental Review Office</td>
<td>04/06/09</td>
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</tbody>
</table>
Comment Set A.1: Antelope Valley Air Quality Management District

February 25, 2009

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
50423 Canwood Street, Suite 215
Agoura Hills, CA 91301


Dear Mr. Boccio and Mr. Seastrand:

The Mojave Desert Air Quality Management District (District) has received the Notice of Availability for the Draft Environmental Impact Report/Environmental Impact Statement for the Tehachapi Renewable Transmission Project. The proposed project would involve the construction, operation, and maintenance of new and upgraded transmission infrastructure along approximately 173 miles of new and existing rights-of-way in southern Kern County, portions of Los Angeles County, including the Angeles National Forest and U.S. Army Corps of Engineers lands, and southwestern San Bernardino County, California.

We have reviewed the project and, based on the information available to us at this time, we have no comments.

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122.

Sincerely,

Alan J. De Salvio
Supervising Air Quality Engineer

Tehachapi RTP Draft EIR EIS
Response to Comment Set A.1: Antelope Valley Air Quality Management District

A.1-1 Thank you for your review.
Comment Set A.2: City of Palmdale

March 6, 2009

Messrs. John Boccio and Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

RE: Draft Environmental Impact Report for Tehachapi Renewable Transmission Project

Dear Messrs. Boccio and Seastrand:

Thank you for the opportunity to review this project. It is our understanding that within the City limits of Palmdale, construction of Segment 5 would consist of the replacement of two 220 kV transmission lines with a new 500 kV line, all within existing right-of-way. As the proposed construction will not require the expansion of existing easements, meaning existing developments including the City Ranch and Ritter Ranch Specific Plan areas will not be impacted, the City is in support of the proposed project.

The City has only minor revisions to note on the Draft EIR:

Table 3.9-7. Land Uses: North Region shall be revised to note that both Ritter Ranch and City Ranch (Anaverde) are approved Specific Plans and are not Planned Developments.

Table 3.9-8. Summary of Large Development and Specific Plans Crossed By or Within ½ Miles of the Proposed Project shall remove mention of Quail Valley Annexation and Development Plan since this project was withdrawn in December 2008. Again, the title of Ritter Ranch and City Ranch shall be revised to Specific Plan from Planned Development.
APPENDIX F. DRAFT EIR/EIS COMMENTS AND RESPONSES
Tehachapi Renewable Transmission Project

Comment Set A.2, continued: City of Palmdale

Letter to Messrs. Boccio and Seastrand
Tehachapi Renewable Transmission Project DEIR
March 6, 2009
Page 2

If you have any questions regarding the comments provided, please contact Susan Koleda or me at (661) 276-5200.

Sincerely

[Signature]

Asoka Herath
Director of Planning

AH:sk

cc: Laurie Lile
Response to Comment Set A.2: City of Palmdale

A.2-1 Thank you for your review of the proposed Project.

A.2-2 Thank you for your review. Table 3.9-7 was corrected in the Final EIR; however, the table is not reproduced in this Final EIS. The Forest Service is aware of the corrections.

A.2-3 Thank you for your review and edits. Table 3.9-8 was corrected in the Final EIR; however, the table is not reproduced in this Final EIS. The Forest Service is aware of the corrections.
Comment Set A.3: John A. Rowland High School

John A. Rowland High School
2000 S. Otterbein Ave., Rowland Heights, CA 91748
(626) 965-3448
(626) 810-4859 Fax
http://rhs.rowland.k12.ca.us
Principal: Robbie Robinson

March 11, 2009

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Gentleman,

As Assistant Principal in charge of facilities at Rowland High School, there are many challenges I face in providing the students of Rowland with a safe, and productive educational environment. Students must be provided with an environment where they can learn to develop the skills so they can successfully compete in the world economy. Within the classroom, technology is used by teachers, computers, LCD projectors and smart boards which provide powerful learning to students. All of this technology is powered by electricity, so as our desire to increase the use of technology in the classroom, our use of electricity also increases.

We all read in the papers about electricity and renewable energy. We teach the uses of renewable energy in our classes, but all our technology is powered by an electric utility system that is second rate and increases our dependence on oil and coal. We must make stand. Our students must see that our leaders are committed to providing a first rate electrical system, using renewable energy sources, delivered reliably. Our society cannot continue to operate the same way. We are giving our students the skills to change the world and the ideas to move our society ahead in the 21st century, but they are using 20th century energy.

The United States is being challenged today. How can the graduating class of Rowland High School in 2009 go out in the world and be successful? The answer is that Rowland High School will produce students with the moral character and skills necessary to be productive citizens. We as parents, citizens and leaders of the United States, must give our children the hope for a brighter future by showing students by making a commitment to deliver renewable, reliable energy to power their dreams.

If you have any questions, please call.

 Regards,

Robert S. Withers
Assistant Principal
Rowland High School
Response to Comment Set A.3: John A. Rowland High School

A.3-1 Thank you for your comments.
Comment Set A.4: South Coast Air Quality Management District

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

E-MAILED: MARCH 18, 2009

Mr. John Buecio and Mr. Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

March 18, 2009

Draft Environmental Impact Report/Environmental Statement (Draft EIR/EIS) for the
Proposed Tehachapi Renewable Transmission Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to
comment on the above-mentioned document. SCAQMD staff reviewed the above document and
has the following comment.

In Volume I Section 3.3 on page 3.3-26, the lead agency discusses Federal General Conformity
Significance Criteria but does not include the general conformity document in the Draft EIR/EIS.
SCAQMD staff contacted the lead agency and was told that the preferred alternative had not yet
been selected by the lead agency. Therefore, the general conformity document was not prepared.
Since this document was not available for review in the Draft EIR/EIS, the SCAQMD staff is
unable to determine the adequacy of the general conformity document. Upon completion, please
forward the general conformity document to the SCAQMD for review.

The SCAQMD staff would be happy to work with the Lead Agency, if necessary, to address this
issue and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist
– CEQA Section, at (909) 396-3302, if you have any questions regarding review of the Draft
EIR/EIS. With regard to the general conformity, please contact Mr. Joe Cassmassi, Planning and
Rules Manager, at (909) 396-3155 or Ms. Kathy Hsiao, Program Supervisor, at (909) 396-3056.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

SS:GM

ODP090219-07
Control Number
Response to Comment Set A.4: South Coast Air Quality Management District

The Forest Service appreciates South Coast Air Quality Management District’s (SCAQMD’s) review of the Draft EIR/EIS. The Draft EIR/EIS provides a range of potential project emissions in comparison with General Conformity applicability thresholds and identified two potential paths for a positive conformity determination. The Draft General Conformity analysis was sent to SCAQMD for review and the Final General Conformity Analysis was finalized on June 2, 2010.
Comment Set A.5: Department of Transportation

March 16, 2009

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Draft Environmental Impact Report/Statement – Tehachapi Renewable Transmission Project (SCH No. 2007081156)

Gentlemen:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the subject Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS).

The project applicant, Southern California Edison (SCE), proposes the construction, operation and maintenance of new and upgraded transmission infrastructure along approximately 173 miles of new and existing rights of way (ROW) Tehachapi Wind Resource Area (TWRA) in southern Kern County, south through Los Angeles County and the Angeles National Forest (ANF), and east to the Mira Loma Substation in Ontario, San Bernardino County. The California Public Utilities Commission (CPUC) is the lead agency for purposes of the California Environmental Quality Act (CEQA), and the U.S. Department of Agriculture Forest Service (USDA-FS) is the lead agency for purposes of the National Environmental Policy Act (NEPA).

The Caltrans Local Development-Intergovernmental Review (LD-IGR) Program is your partner in stewardship of the public interest, our part of which entails the State Highway System (SHS). On October 7, 2008, we provided written comments (Attachment 1) on the Notice of Preparation for the current project. We also provided comments (Attachments 2 through 6) to the project applicant as well as to the CPUC, USDA-FS and the Bureau of Land Management (BLM) in previous years as part of the review process for associated projects/phases.

In consideration of our responsibilities under CEQA and identified in 40 CFR 1508.15 and 40 CFR 1508.26 for NEPA purposes, we have the following specific comments on the DEIR/EIS and the applicant’s proposal:

1. Section 7 of the DEIR/EIS provides a discussion on the scoping process, identifies numerous commenting agencies and parties who submitted comments during the NOP/NOI comment period, and summarizes environmental concerns that were expressed. As noted above, Caltrans submitted a letter on the scope of your DEIR/EIS on October 1, 2007, expressing that encroachment permits would be required for any nonstandard use of State highway facilities, and that transportation permits may be required for heavy or oversized loads. Caltrans is not listed among the commenting entities Section 7 of your document identifies in its summary of the scoping process, nor does this...
Comment Set A.5, continued: Department of Transportation

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
Tehachapi Renewable Transmission Project (SCH No. 2007081156)
March 13, 2009
Page 2

acknowledge the substance of our comments. While this section correctly states that a scoping report is not required, we expect that such a report, if prepared, should be all-inclusive rather than arbitrarily inclusive.

We appreciate your acknowledgement of our encroachment permit requirements beginning in Section 3.13.3 of the DEIR/EIS. As noted above, our October 2007 comment letter on the NOP/NOI also states that heavy or oversized loads may be subject to transportation permit requirements. While your document refers to the need to obtain “other permits,” we prefer the record to show specificity in this regard where the SIHS is concerned. It is important to be aware that Permits engineers may require certain conditions be met prior to issuing encroachment or transportation permits, based on the level of information provided at the time of the application but unavailable at the current level of review. Please avoid unnecessary delays as your project goes to implementation by consulting our Permits offices as early as possible, such as prior to the release of your Final EIR/EIS.

You identify our District 7 office as your point of contact in your discussion on Hazardous Waste Transport (Section 3.13.3.2). This is true for relevant activities in Los Angeles and Ventura Counties. We add that your point of contact for nonstandard uses of State highway facilities in Kern County is our District 6 office, while such uses in San Bernardino County would be reviewed by Permits staff in our District 8 office. For more information on permits and contact information, you may access our Encroachment Permits website: http://dot.ca.gov/hq/traffops/developsrv/permits/.

2. We reiterate concerns related to transportation corridor preservation expressed in the following correspondence: our January 14, 2005 response to Applicant’s Notice of Application for Segment 1 of the Antelope Transmission Project (Attachment 2), our January 20, 2005 response to Applicant’s Notice of Application for Segments 2 and 3 of the Antelope Transmission Project (Attachment 3), our July 21, 2005 response to the NOP (addressed to CPUC and ANF) for the Antelope-Pardee Transmission Project (SCH No. 2005061161)(Attachment 4), our November 1, 2005 response to the Application for Certificate (addressed to Applicant’s Regional Manager for Public Affairs)(Attachment 5), and our April 30, 2008 correspondence regarding the NOP for the Barren Ridge Renewable Transmission Project (SCH No. 20080401038)(Attachment 6), an associated project over which the USDA-FS and BLM share Federal lead agency roles. We appreciate your acknowledgement of existing land uses for transportation facilities in Section 3.9. As we consider the preservation of transportation corridors to accommodate future transportation needs of our growing communities, we also anticipate that in the future we will need to acquire ROW for expansion of and connections between existing SIHS facilities. Siting of your project’s features both as proposed and in future phases should not conflict with future expansion needs of SIHS facilities. We request that you consult with our Planning offices in District 7 and District 8 prior to the release of your Final EIR/EIS to ensure such conflicts do not arise in the long term.

3. Section 3.13 discusses significance criteria related to traffic and transportation impacts. Criterion TRA2 is defined as “[a]n increase in vehicle trips associated with construction workers or equipment would result in an unacceptable reduction in level of service on the roadways in the Project vicinity.” Please note that we consider the term “level of service (LOS)” to be a qualitative description of
traffic flow based on several underlying operational factors. Significance of impacts to the SHS should not be measured in terms of reductions in LOS, but the underlying measures of effectiveness.

Where traffic standards have been provided by local and regional agencies is certainly applicable to jurisdictions owning roadways to which these criteria pertain. Where the SHS is concerned, Caltrans is a responsible agency under CEQA, owner-operator of the SHS under the California Streets and Highways Code, thus having jurisdiction by statute over the SHS as provided for in 40 CFR 1508.15. Therefore, the goals identified in regional Congestion Management Plans (CMPs) do not necessarily reflect the needs of the SHS.

Section 3.13 of the DEIR/EIS considers Average Daily Trip (ADT) volumes on local and State transportation facilities. The operational factors underlying any given LOS are dynamic and can change several times a day, considering peak trip generation hours for land uses associated with a particular transportation network. For example, vehicle throughput on a given segment could be characterized as operating at LOS "C" during non-peak hours, while peak hour generations could load that same segment to operate at LOS "F." Under these conditions, even a minor addition of vehicle trips to the system could be significant. Therefore, we feel it is also important to consider peak hour volumes on a roadway network to accurately describe traffic and transportation impacts resulting from trips generated through construction activities. Your document seems to be in concurrence, where it states on Page 3.13.11 that "[d]elivery activities requiring major street use would be scheduled to occur during off-peak traffic hours."

Page 3.13.22 states that haul trips associated with Alternative 5 would occur all day long and would not increase the total number of peak-hour trips, concluding that "the peak number of daily worker commute trips and equipment deliveries for this alternative would be approximately the same as those for the proposed Project." First, even with an evenly distributed trip generation by construction of the proposed project, the surrounding roadway network would nonetheless experience peak hour volumes. This means that the vehicle trips associated with the proposed project could pose less than significant impacts when surrounding roadway network’s average daily trips are considered, while posing significant impacts to networks under peak hour volumes. Second, the number of peak hour trips generated by the proposed project and incorporated by reference into the analysis of Alternative 5 has not been determined in that the existing roadway network’s traffic volumes are expressed in terms of ADT, as discussed in the paragraph above.

4. We encourage ongoing consultation with local jurisdictions regarding transportation impacts on collector/frontage roads and arterials as described in Section 3.13. Our particular concern is that stoppages on these roadways could result in unacceptable safety hazards associated with traffic queues at off ramps backing up into through lanes on SHS facilities. The likelihood for these conditions is exacerbated during peak hours. We note that certain peak hour assumptions are made where mitigation measures are discussed, but urge that the analysis of existing conditions and project impacts include peak hour volumes to ensure the efficacy of these mitigation measures.

5. This letter also reiterates the concern regarding wildlife corridor management addressed in Attachment 6. We appreciate your analysis of wildlife/biological corridors in Section 3.4 and "Caltrans improves mobility across California"
Comment Set A.5, continued: Department of Transportation

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
Tehachapi Renewable Transmission Project (SCH No. 2007081156)
March 13, 2009
Page 4

Section 3.15. The ANF Land Management Plan (2005) identifies the I-5 Corridor Place as an important wildlife linkage between the Angeles and Los Padres National Forests (53); in this light it should be noted that Caltrans programs related to wildlife corridor management may be impacted by potential effects to wildlife movement within portions of the project area. We request that you consult with our District 7 office prior to the release of your Final EIR/EIS to determine whether such impacts occur, and if so, to establish fair and proper means to mitigate them.

Please let us know if we can be of assistance. My telephone number is 916.651.8201, and I can be reached via e-mail at: gary.arnold@dot.ca.gov.

Sincerely,

Gary S. Arnold
Statewide Local Development-Intergovernmental Review Coordinator
Office of Community Planning

c: State Clearinghouse
M. Navarro, Caltrans District 6 Planning
E. Alvarez, Caltrans District 7 Planning
D. Kopulsky, Caltrans District 8 Planning
Dina El Nakhal, Caltrans HQ Encroachment Permits
Kelly Dunlap, HQ Division of Environmental Analysis

"Caltrans improves mobility across California"
Comment Set A.5, continued: Department of Transportation

October 1, 2007

John Boccio/George Farra
California Public Utilities Commission/Angeles National Forest
C/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

SCH 2007081156, Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement, Tehachapi Renewable Transmission Project, Southern California Edison Company

Dear Messrs. Boccio and Farra:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Notice of Preparation for a Joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Tehachapi Renewable Transmission Project (Project).

Caltrans is a Responsible agency pursuant to the California Environmental Quality Act (CEQA) for the Project. While the exact locations of planned transmission line encroachment to the State Highway System (SHS) is unclear, potential impacts are indicated within three Caltrans Districts: District 7, Los Angeles County; District 8, San Bernardino County; and District 9 for the eastern portion of Kern County.

Our specific comments regarding preparation of the EIR/EIS:

- Identify the locations where the transmission lines will cross the SHS in the alternatives considered.
- Determine if access to and placement of new and existing transmission towers or poles, pull and splice locations and other transmission line infrastructure, via temporary spur roads and construction easements, will be through the Caltrans Right of Way (R/W).
- An Encroachment Permit is required for any encroachment onto the SHS R/W. The web link directly below connects to the Caltrans Encroachment Permits Homepage, which in turn links to the Standard Encroachment Permit Application.

http://dot.ca.gov/hq/traffic/developserv/permits/

For questions about the Encroachment Permit process and requirements, please telephone:

District 7: 213-897-3631
100 South Main Street, Suite 100
Los Angeles, CA 90012

"Caltrans improves mobility across California"
Comment Set A.5, continued: Department of Transportation

ATTACHMENT 1 (2 of 2)

John Boccio/George Farra
California Public Utilities Commission/Angeles National Forest
Page 2

District 8: 909-383-4526
464 W. 4th Street, MS 619
San Bernardino, CA  92401-1400

District 9: 760-872-0674
500 South Main Street
Bishop, CA  93514

- A Transportation Permit is required for the movement of vehicles/loads exceeding statutory limitations on the size, weight, and loading of vehicles contained in Division 15 of the California Vehicle Code. The link below is to the Transportation Permits Homepage.
  http://dot.ca.gov/hq/traffic/permits/

For questions about the Transportation Permit process and requirements, please telephone the South Region office at 909-383-4637. The South Region office is located at 655 West 2nd Street, MS-618, San Bernardino, CA  92404-1400.

If you have questions about our comments, please contact Cheryl J. Powell in District 7 via telephone at 213-897-3747 or e-mail: Cheryl_j_powell@dot.ca.gov; Dan Kopulsky in District 8 via telephone at 909-383-4557 or e-mail: dan_kopulsky@dot.ca.gov; or Gayle Rosander in District 9 via telephone at 760-872-0785 or e-mail: gayle_rosander@dot.ca.gov.

Again, we thank you for the opportunity to contribute to the preparation of the Project’s environmental review.

Sincerely,

Betty Miller
Statewide Local Development-Intergovernmental Review Coordinator
Office of Community Planning

c: D. Kopulsky, Chief, Special Studies/IGR-CEQA, District 8
S. Fong, IGR Coordinator, District 8
C. Powell, IGR Program Manager, District 7
G. Rosander, IGR Coordinator, District 9
S. Windenread, Permit Writer, District 9
S. Morgan, Senior Planner, State Clearinghouse

“Caltrans improves mobility across California”
Comment Set A.5, continued: Department of Transportation

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 MAIN STREET, SUITE 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0362
FAX (213) 897-0360
TTY (213) 897-4937

ATTACHMENT 2 (1 of 2)

January 14, 2005

Mr. Charles Adamson
Project Manager
Southern California Edison
1321 State College Blvd.
Fullerton, CA 92831-5338

IGR/CEQA No. 050115  Vic. LA-138
Antelope Transmission Project
Southern California Edison Company
CA P.U.C. Application No. A.04-12-XXX

Dear Mr. Adamson:

This letter is in response to your letter to Department of Transportation Director Will Kempton dated December 16, 2004 and the attached two-page “Notice of Application” to the California Public Utilities Commission. The California Department of Transportation (Department) has the following comments.

With regard to the proposed Antelope-Pardee 500 KV Transmission Line (Segment 1 of the Antelope Transmission Project), we would like to bring to your attention the potential for encroachment upon the State right-of-way for either existing or future transportation facilities. We are not as concerned about the Phase 1 Antelope-Pardee line, as we are about the potential for the development of transmission lines in later phases that may cross major transportation facilities. We wish to preserve to the extent possible, the locations for additional transportation facilities that may be needed due to continued growth in the Antelope Valley area.

According to the map in Appendix D of the application, the Antelope facility would be southwest of any new freeway through the western Antelope Valley and the Pardee facility would be northeast of Interstate 5. The line would cross over the Santa Clarita Cross-Valley Connector. We recommend that no large transmission towers or other large constructed facilities be situated in locations that could block further widening or development of the Connector or other major roads in the Santa Clarita Valley. For future segments, we ask that consideration be given to a major east-west route south of the current Route 138 and west of State Route 14, when planning placement of additional transmission facilities.

We note that there is consideration of siting wind-energy facilities in the general area of the Tehachapi Mountains, in the vicinity of southern Kern County. Any large transmission lines from that location southward would cross the location of the current State Route 138 highway that connects Interstate 5 and State Route 14. With large-scale potential developments planned for the western Antelope Valley, transportation facilities are likely to be expanded along that route.

*Calmness improves mobility across California*
Comment Set A.5, continued: Department of Transportation

Mr. Charles Adamson
Southern California Edison
January 14, 2005
Page 2

ATTACHMENT 2 (2 of 2)

Again, we ask that consideration be given to allowing passage of a wide transportation facility between any large transmission line facilities.

As a reminder, changes in utility line crossings over any State Highway would require an Encroachment Permit from the Department. Any kind of effect into, on, over or under State right-of-way, permanent or temporary, needs such a Permit. We recommend allowing adequate time for obtaining such permits, particularly when there has not been prior discussion with the Department.

Please note that the transport of heavy construction equipment and/or materials, or other special equipment, which requires the use of oversized transport vehicles on State highways would require a transportation permit from the Department.

We welcome the opportunity to meet with you to discuss these matters further.

If you have any questions, please contact the Intergovernmental Review Program Manager, Cheryl Powell, of my staff at (213) 897-3747. For further inquiries, please refer to IGR/CEQA Number 050115/09.

Sincerely,

Rose A. Casey
Deputy District Director
Division of Planning, Public Transportation & Local Assistance
Comment Set A.5, continued: Department of Transportation

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 MAIN STREET, SUITE 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0362
FAX (213) 897-0360
TTY (213) 897-4977

ATTACHMENT 3 (1 of 2)

January 20, 2005

Mr. Charles Adamson
Project Manager
Southern California Edison
1321 State College Blvd.
Fullerton, CA 92831-5338

IGR/CEQA No. 050115
Vic. LA-138
Antelope Transmission Project --
Segments Two and Three
Southern California Edison Company
CA P.U.C. Application No. A.04-12-XXX

Dear Mr. Adamson:

This letter is in response to your letter to Director Will Kempton dated December 16, 2004 and the accompanying two-page “Notice of Application” to the California Public Utilities Commission. For the California Department of Transportation (Department), we have the following comments.

In this letter we discuss the proposed Antelope-Vincent 500 kV Transmission Line (Segment 2 of the Antelope Transmission Project), and also the proposed Antelope-Substation One 500 kV Line together with the proposed Substation One - Substation Two 220 kV Line (Project Segment 3). We would like to bring to your attention the potential for encroachment upon transportation facilities right-of-ways. When the proposed transmission lines are built, we hope they would not inhibit the future development or expansion of the transportation facilities they would cross. To the extent possible, we wish to preserve conditions to facilitate development of very large additional transportation facilities that would be needed due to future urban development in the western Antelope Valley area.

According to the text description in the “Notice of Application”, the lines developed in the two segments would extend south of wind-energy generators located in the general area of the town of Tehachapi in southern Kern County. These lines would connect with the Antelope substation west of the State Route (SR) freeway SR-14 and just north of the San Gabriel Mountains crest. They would cross over the current SR-138 highway that connects the freeways Interstate 5 and SR-14. According to recent major studies, and also with large-scale potential developments proposed for the western Antelope Valley, transportation facilities are likely to be expanded along the SR-138 corridor, to include a multi-lane freeway and possibly more. We ask that consideration be given to location and spacing of any large transmission-line facility structures to allow passage of very wide transportation facilities between them.

"Corrises improves mobility across California"
Besides the existing SR-138, there could be other major developments of transportation facilities in the vicinity of the proposed transmission-line improvements. For example, there has been past consideration of a major additional southeast-northeast road west of SR-14 and south of the current SR-138, which might connect an expanded east-west facility in eastern Palmdale with the Quail Lake Road section of existing SR-138 (leading to interstate 5). We ask that the planning and placement of transmission-line facilities take into consideration these possibilities.

As a reminder, a change in utility line crossings over any State Highway would require an Encroachment Permit from the Department. Any kind of effect into, on, over or under State right-of-way, permanent or temporary, needs such a Permit. We suggest allowing adequate time for obtaining such permits, particularly if there has not been prior discussion with the Department.

Please note that transport of heavy construction equipment and/or materials, or other special equipment, which requires the use of oversized-transport vehicles on State highways, would require a Transportation Permit from the Department.

We would welcome the opportunity to meet with you to discuss these matters further.

If you have any questions, you may contact the Intergovernmental Review Program Manager, Cheryl Powell, of my staff at (213) 897-3747. For further inquiries, please refer to IGR/CEQA Number 050115/EIR.

Sincerely,

[Signature]

Rose A. Casey
Deputy District Director
Division of Planning, Public Transportation & Local Assistance
Comment Set A.5, continued: Department of Transportation

July 21, 2005

Mr. John Boccio and Ms. Marian Kadota – CPUC/ANF
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Dear Mr. Boccio and Ms. Kadota:

This letter is in response to our receiving the Notice of Preparation (NOP) for the project referenced above. A new 25.6-mile 500-kV transmission line for electrical power is to be built between the Antelope and Pardee substations of Southern California Edison Company. The California Public Utilities Commission is identified as the Lead Agency in the Document Details Report of the State Clearinghouse. For the California State Department of Transportation (Department), we have the following comments.

Regarding the proposed Antelope-Pardee 500 kV Transmission, we wish to bring to your attention the potential for encroachment upon any either existing or future right-of-way of a transportation facility that would be used by the State or affect operation of State facilities. Also, we are not as concerned about this new line, as we are about potentially needed other transmission lines that may later be developed and cross major transportation facilities. The new line would accommodate delivery of power through those other lines, as noted in our letter of January 20, 2005 to Mr. Charles Adamson of the Southern California Edison Company, concerning an application to the California Public Utilities Commission (CPUC). To the extent possible, we wish to preserve locations for additional large transportation facilities that may be needed due to continued large growth in land development in the Antelope Valley or the Santa Clara River Valley areas.

According to the accompanying General Location Map, all of the proposed Antelope-Pardee line would be southwest of any new freeway through the western Antelope Valley and northeast of Interstate-5 (I-5). Appearance on the map, however, is that the line might cross over the Santa Clarita Cross-Valley Connector. That new Connector route is intended to reduce travel demand in the upper Santa Clara Valley area on freeways I-5 and State Route 14 (SR-14). We recommend that no large transmission towers or other large constructed facilities be situated in locations that could block further widening or development of the Connector. We also strongly recommend continuing consultation with advance planning staff of local agencies such as those within subdivisions of Los Angeles County government, regarding crossings of potential sites of other major roads that might be built in the upper Santa Clara valley.

"Caltrans improves mobility across California"
ATTACHMENT 4 (2 of 3)

Mr. Boccio and Ms. Kadota
July 21, 2005
Page 2 of 3

We note that there has been consideration of siting large amounts of wind-energy facilities in the
general area of the Tehachapi Mountains, in the vicinity of southern Kern County. Any large
transmission-lines from that area southward would cross over the current State Route (SR) 138
highway that connects the freeways I-5 and SR-14. According to recent major studies, and also
with large-scale potential developments proposed for the western Antelope Valley, transportation
facilities are likely to be expanded along the SR-138 corridor, to include a multi-lane freeway and
possibly more. We ask that consideration be given to location and spacing of any large
transmission-line facility structures in or near this corridor, to allow passage of very wide
transportation facilities between or among them.

Further, we ask for consideration of possible new major east-west routes in the western Antelope
Valley, as appropriate, for planning future development of transmission line segments besides
those mentioned in this NOP. For example, there has been consideration of a major additional road
route running northwest-southeast that would connect with the existing SR-138 in the Quail Lake
area (leading to I-5). This new road would run to a connection with the SR-14 freeway near
Soledad Pass south of Palmdale or with an expanded east-west highway running through eastern
Palmdale. Such a route is shown on the currently-existing District 7 System Plan for SR-138. The
North Los Angeles County Combined Corridor study coordinated by the County Metropolitan
Transportation Authority and completed in May 2004 dealt with some proposed new road route
locations, but these new locations are east of SR-14. We recommend checking with other local
agencies for locations of routes west of SR-14 that might have been considered at various times for
major expansion of transportation facilities as long-run system improvements. Agencies dealing
with western Antelope Valley in Kern County might also be consulted on possible new routes,
although considering extensive urban development in that area would be speculative.

For this and related projects, we are concerned possible about effects on wildlife movement. We
note that a substantial constructed facility might at least lead to substantial behavior modification,
such as an animal moving along an electrical transmission line to find a gap. The project location
cuts across the San Gabriel Mountains range, an obvious wildlife corridor. The western Antelope
Valley area is possibly in the vicinity of wildlife corridors between the main Tehachapi Mountains
and the San Gabriel Mountains to the south. Corridor linkage has been identified as important for
the dispersal of wildlife and plants, important in maintaining biological diversity. The Department
occasionally has made provisions for wildlife crossings of State facilities that run across such
corridors. Generally the protection of wildlife corridors could facilitate and enhance the
effectiveness of Department efforts. Therefore we ask for consideration and mitigation of
cumulative impacts of proposed projects on any potentially significant wildlife corridors. We
request that important environmental organizations potentially interested in wildlife corridors be
contacted and kept informed on the projects mentioned in this letter. You may contact our office
for some information on environmental organization contacts.

"Culverts improve mobility across California"
ATTACHMENT 4 (3 of 3)

Mr. Boccio and Ms. Kadota
July 21, 2005
Page 3 of 3

As a reminder, we note that a change in utility line crossings over any State Highway would require an Encroachment Permit from the Department. Any kind of effect into, on, over or under State right-of-way, permanent or temporary, needs such a Permit. We suggest allowing adequate time for obtaining such permits, particularly if there has not been prior discussion with the Department.

We would welcome the opportunity to meet with you to discuss these matters further.

If you have any questions, you may contact me at (213) 897-3747. For further inquiries, please refer to IGR/CEQA Number 050657/EK.

Sincerely,

Original signed by --

CHERYL J. POWELL
IGR/CEQA Program Manager, Caltrans District 7

cc: Mr. Scott Morgan, State Clearinghouse

bcc: Ms. Rose Casey, Deputy District Director,
Division of Planning, Public Transportation & Local Assistance
Ms. Betty Miller, HQ Transportation Planning Office, IGR/CEQA

"Caltrans improves mobility across California"
Comment Set A.5, continued: Department of Transportation

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET
LOS ANGELES, CA 90012-3606
PHONE (213) 897-3747
FAX (213) 897-1337

ATTACHMENT 5 (1 of 1)

November 1, 2005

Mr. Alis Clausen
Regional Manager for Public Affairs
SCE Antelope Service Center
42060 10th Street West
Lancaster, CA 93534

Antelope Transmission Project
Application for Certificate – CPUC NO. A.04-12-008
Vicinity LOS/14/54-55 IGR/CEQA # 051009/EK

Dear Mr. Clausen:

We have received the Application for Certificate for the project referenced above right. The proposed project is for improvement of electrical transmission lines between the Antelope and Vincent substations and between the Antelope substation and a new substation to be located near Cal Cement. For the California State Department of Transportation (Department), we have the following comments on the application.

We reiterate concerns that we have mentioned in letters of January 14 and 20 and of July 21 of this year. We wish to avoid unnecessary future problems for expansion of the transportation facilities. We ask for consultation with our Department on details of design and location where the transmission lines would cross State highways. We also ask consideration of plans of other transportation agencies for major highways to carry traffic in the large and rapidly developing western Antelope valley area.

We note that the Antelope-Vincent line would cross the freeway State Route 14 near Soledad Pass. This route is currently the main commute route south from the Antelope valley, and there is some possibility of its later expansion. We therefore ask for care in the design and development of transmission facilities crossing this route.

If you have any questions regarding our comments, please refer to our internal IGR/CEQA Record Number 051009/EK; and please do not hesitate to contact our review coordinator Edwin Kampmann at (213) 897-1346 or to contact me at (213) 897-3747.

Sincerely,

Original signed by – –

CHERYL J. POWELL
IGR/CEQA Program Manager

“Caltrans improves mobility across California”
Comment Set A.5, continued: Department of Transportation

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 MAIN STREET, SUITE 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0362
FAX (213) 897-0360
TTY (213) 897-4937

ATTACHMENT 6 (1 of 2)

April 30, 2008

Mr. Charles C. Holloway
c/o Forest Service/BLM/Power Engineers, Inc.
731 E. Ball Road, Suite 100
Anaheim, CA 92805

IGR/CEQA No. 080433  Vic. LA-138
Barren Ridge Renewable Transmission Project
of Los Angeles City Dept. Power and Water
SCH No. 2008041038

Dear Mr. Holloway:

We received the Notice of Preparation (NOP) for the project referenced at above right. Electrical power transmission capacity would be increased, between the Tehachapi Mountains Barren Ridge station and facilities in the upper Santa Clara River and upper San Fernando valleys. For the California State Department of Transportation (Department), we have the following comments.

We ask for consideration of potential for encroachment upon any either existing or future right-of-way of a transportation facility that would be used by the State or affect operation of State facilities. To the extent possible, we wish to preserve locations for additional large transportation facilities that may be needed due to continued large growth in land development.

According to the accompanying very large-scale map of the USDI Bureau of Land Management and the USDA Forest Service, all of a proposed new line of towers would be west of the Antelope Valley freeway State Route 14 (SR-14). Map appearance is also that the line would not cross over the Santa Clarita Cross-Valley Connector road, which is expected to reduce travel demand in the vicinity on freeways 1-5 and SR-14. However, we strongly recommend continuing consultation with advance planning staff of local agencies, including those within divisions of Los Angeles County, regarding crossings of potential sites of other major roads that might be built in the upper Santa Clara valley. We hope that no large transmission towers or other large constructed facilities would be situated in ways that could block widening or development of such roads.

We note that any transmission-lines from the Tehachapi Mountains southward would cross over the current State Route (SR) 138 highway that connects freeways I-5 and SR-14. According to recent major studies, and regarding potential for large-scale development in the western Antelope Valley, transportation facilities are likely to be expanded along the SR-138 corridor, to include a multi-lane freeway and possibly more. We ask that consideration be given to location and spacing of any large transmission-line facility structures in or near this corridor, to allow passage of very wide transportation facilities between or among them.

"Caltrans improves mobility across California"
Comment Set A.5, continued: Department of Transportation

ATTACHMENT 6 (2 of 2)

Mr. Charles C. Holloway  
April 30, 2008  
Page 2 of 2

Further, we recommend checking with local agencies that would handle development permissions for the large amounts of land that could accommodate extensive urban development in the western Antelope Valley. They might have word of other locations west of SR-14 that might be considered for major long run expansion of transportation facilities.

For this and related projects, we are concerned about possible effects on wildlife movement. Might a substantial constructed facility lead to significant behavior modification, such as animals moving along an electrical transmission line to find a gap? The project location runs across the San Gabriel Mountains range, an obvious wildlife corridor. Could the western Antelope Valley also contain wildlife corridors between the Tehachapi and San Gabriel Mountains? Corridor linkage has been identified as important for the dispersal of wildlife and plants, maintaining biological diversity. The Department occasionally has made provisions for wildlife crossings of State facilities. Protection of wildlife corridors elsewhere could facilitate and enhance effectiveness of such Department efforts. Therefore we ask for consideration and mitigation of cumulative impacts of proposed projects on any potentially significant wildlife corridors. We request that important environmental organizations potentially interested in wildlife corridors be contacted and kept informed on projects mentioned in this letter. You may contact our office for some information on environmental organization contacts.

As a reminder, we note that a change in utility line crossings over any State Highway would require an Encroachment Permit from the Department. Any kind of effect into, on, over or under State right-of-way, permanent or temporary, needs such a Permit. We suggest allowing adequate time for obtaining such permits, particularly if there has not been prior discussion with the Department.

We would welcome the opportunity to meet with you to discuss these matters further.

If you have any questions, you may contact me at (213) 897-6696. For further inquiries, please refer to IGR/CEQA Number 080433/EK.

Sincerely,

Original signed by --

ELMER ALVAREZ  
IGR/CEQA Program Manager, Caltrans District 7

cc: Mr. Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"
Response to Comment Set A.5: Department of Transportation

A.5-1 Thank you for your comments in response to the Notice of Preparation and for providing copies of previous letters. Your comment letter and attachments are included in the Scoping Report prepared for the proposed Project and were considered in preparation of the Final EIR prepared by the CPUC and this Final EIS.

A.5-2 Commenting entities are not listed in Section 7 of the Draft EIR/EIS nor does that section attempt to present all the scoping comments received. All comments received in response to the Notice of Preparation, as well as all other comments received during the scoping process, are presented in a separate Scoping Report prepared by the Lead Agencies (CPUC and Forest Service), which thoroughly documents the scoping process and all comments. The Scoping Report is all inclusive. NEPA (CFR 1501.7) explains that the scoping process shall be used to determine the scope of issues to be addressed and identify the significant issues related to the proposed action. CFR 1502.12 also states that the Summary shall include issues raised by agencies and the public. Relevant issues and concerns identified during the scoping process that are addressed in the Draft EIR/EIS are summarized at the beginning of each resource/issue area section in Chapter 3.

A.5-3 Thank you. Table 1-1 (Required Federal and State Permits and Approvals) in the Final EIS has been revised to indicate the need for encroachment permits for any nonstandard use of State highway facilities as well as the need for permits for heavy or oversized loads. This information will be passed on to SCE, which will be responsible for obtaining all necessary permits for the Project.

A.5-4 Thank you. The Final EIR was revised and the Final EIS has been revised to reflect that District 6 is the point of contact for permits in Kern County and District 8 is the point of contact for San Bernardino County. This information will be passed on to SCE, which will be responsible for obtaining all necessary permits for the Project.

A.5-5 The Final EIR was revised and the Final EIS has been revised to include a requirement for SCE to coordinate with all affected Caltrans District offices prior to final design to avoid conflicts with any planned future expansion of State Highway Facilities.

A.5-6 This comment is in response to a CEQA requirement to evaluate the significance of impacts; however, significance conclusions based on defined criteria are not necessary in an EIS. Therefore, a response to this comment is not included in this EIS, but was provided in the Final EIR prepared by the CPUC.

A.5-7 The discussion related to the proposed Project’s consistency with Congestion Management Plans states that construction should not be inconsistent with regional and local transportation plans. Review and consideration of the Congestion Management Plans was not meant to imply that they are applicable to the State highway system.

A.5-8 This information does not result in changes to the proposed action, alternatives, analysis, or recommended mitigation measures. A full response to this comment is provided in Section 3.13.2.2 of the Final EIR, but is not included in this Final EIS.

A.5-9 A response to this comment was provided in the Final EIR and considered by the CPUC in its Decision on the Project. The concerns raised in the comment relate to the non-federal portion
of the Project and do not affect decisions to be made by the Forest Service or the USACE; however, federal decision makers are aware of the City’s concerns. The comment does not necessitate any changes to the Final EIS. A more detailed response to this comment is provided in the Final EIR, but is not discussed further in this Final EIS.

A.5-10 Thank you for your comment. This comment does not result in changes to the proposed action, alternatives, analysis, or proposed mitigation measures. A full response to this comment is provided in the Final EIR, but is not included in this Final EIS.

A.5-11 Thank you for your comment. The Interstate-5 corridor is located at least 10 miles west of the proposed Project and would not be affected by the proposed Project. Effects of this Project on wildlife movement corridors are addressed in Section 3.4, Biological Resources. Analysis shows that transmission lines have little effect on terrestrial wildlife movement since disturbance is not continuous. Impact B-40 discusses specific impacts on bird and bat migration corridors.
Comment Set A.6: City of Brea

March 17, 2009

John Boccio
Justin Seastrand
CPUC/USDA Forest Group
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Dear Messrs. Boccio and Seastrand:

I am writing in response to the Draft Environmental Impact Report (DEIR) for the proposed Tehachapi Renewable Transmission Project. The City of Brea appreciates the opportunity to provide comments on this document.

Our comments are limited at this time to addressing “Project Alternative 4: Chino Hills Alternative(s)” since this is the fundamental aspect of the project which has the potential to directly impact the City of Brea. Additionally, I wanted to take this opportunity to thank you for the tele-conference between John Boccio and our City Planner, David Crabtree, to further clarify some of the details regarding this alternative. The proposed transmission line, which crosses through the City of Brea depicted in Alternative 4, is limited to an easement corridor which today also contains towers and transmission lines. However, we understand that to accommodate the new power lines from the Tehachapi generating facility, additional towers and power lines would need to be added within the Brea corridor. This work would likely involve establishing new construction and service access roads as well as associated grading and related activities for tower siting.

Last year, the City of Brea Planning Commission approved a development application (Canyon Crest project - 165 single-family homes) for a portion of the land where the Alternative 4 transmission line would cross through our City. Additionally, the Olinda Village residential community is near the proposed Alternative 4 transmission line.
Comment Set A.6, continued: City of Brea

John Boccio
Justin Seastrand
March 17, 2009
Page 2

corridor. As such, the City of Brea would appreciate the ability to provide further review
and comment upon tower siting, road design and related grading and construction
details should Alternative 4 be selected for implementation. Our concerns would be
specific to aesthetic impacts to the Brea community with a goal to reduce any such
impacts to the greatest extent possible.

I hope this information is of benefit. Please feel free to reach me at (714) 990-7690 if
you should have any questions.

Sincerely,

Charles View
Development Services Director

CC   Tim O’Donnell, City Manager
     David Crabtree, City Planner
     Bill Shopoff, The Shopoff Group
Response to Comment Set A.6: City of Brea

A.6-1 As discussed in the Draft EIR/EIS, Alternative 4 would place a new double-circuit 500-kV transmission line adjacent to the existing transmission line corridor. The ROW would need to be expanded by approximately 150 feet to accommodate the new 500-kV line. As described, new land disturbance would result from upgrades to existing access roads and the addition of new permanent access and spur roads. Please refer to Tables 2.4-2 (Alt 4A), 2.4-5 (Alt 4B), 2.4-8 (Alt 4C), and 2.4-11 (Alt 4D) for preliminary estimates of land disturbance associated with Alternative 4. Alternative 4 is located outside the jurisdiction of the Forest Service or USACE. A response to this comment was provided in the Final EIR and considered by the CPUC in its Decision.

A.6-2 SCE will coordinate with affected property owners, as well as local agencies, prior to construction of the Project. Visual (aesthetic) impacts associated with Alternative 4 have been addressed in the Draft EIR/EIS in Section 3.14.8. A representative Key Observation Point near the City of Brea is referenced as “South-21” and the existing conditions are shown in Figure 3.14-57a with simulations of Alternatives 4A and 4C shown in Figure 3.14-57b and Alternatives 4B and 4D shown in Figure 3.14-57c. Alternative 4 is located outside the jurisdiction of the Forest Service or USACE. A response to this comment was provided in the Final EIR and considered by the CPUC in its Decision.
Comment Set A.7: City of San Marino, Planning & Building Department

City of San Marino
Planning & Building Department

March 19, 2009

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

SUBJECT: RESPONSE TO TEHACHAPI RENEWABLE TRANSMISSION PROJECT

Dear Mr. Boccio and Mr. Seastrand:

Thank you for the opportunity to review and comment on the Tehachapi Renewable Transmission Project. The City of San Marino has no comments regarding the project at this time.

Should you have any questions or need additional information, please feel free to contact me by phone at 626-300-0711 or by email at a thorson@cityofsanmarino.org.

Sincerely,

AMANDA THORSON
Planning & Building Assistant

2200 Huntington Drive, San Marino, CA 91108-2691 • Phone: (626) 300-0711 Fax: (626)282-3587
Response to Comment Set A.7: City of San Marino, Planning & Building Department

A.7-1 Thank you for reviewing the Draft EIR/EIS. Currently, the City of San Marino has no comments to be addressed in the Final EIS.
Comment Set A.8: County of Los Angeles, Department of Public Works

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
"To Enrich Lives Through Effective and Caring Service"

GAIL FARBER, Director

March 25 2009

Mr. John Boccio, CPUC, EIR Project Manager
Mr. Justin Seastrand, USDA Forest Service, Special Uses Coordinator

c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Dear Mr. Boccio and Mr. Seastrand:

DRAFT ENVIRONMENTAL IMPACT REPORT FOR
TEHACHAPI RENEWABLE TRANSMISSION PROJECT

As requested, we reviewed the Draft Environmental Impact Report (DEIR) for the subject project. The proposed project includes construction, operation, and maintenance of 173 miles of new and upgraded transmission infrastructure within new and existing right of ways. The transmission alignment extends southerly from Kern County through north and central Los Angeles County and easterly along the Puente/Chino Hills to San Bernardino County.

The following comments are for your consideration:

Hydrology/Water Quality

1. Alternative 2, the Southern California Edison (SCE) proposed project alternative includes two proposals for the double-circuit 66-kV transmission towers in Segment 7, either relocation of 45 existing towers to the edge of the SCE right of way between Mile Post 4.4 and 15.8 or undergrounding of the transmission lines of these same towers for the same 11.4 miles. Since this stretch of Segment 7 runs immediately parallel to the San Gabriel River from the City of Irwindale southerly through the Whittier Narrows Dam Recreation Area and because the relocation of the towers to the edge of the right of way could increase the area with restricted use around the SCE right of way, we recommend that the transmission lines be placed underground rather than the towers relocated. This would minimize impacts to proposed and ongoing San Gabriel River Corridor Master Plan projects in the area.
Comment Set A.8, continued: County of Los Angeles, Department of Public Works

Mr. John Boccio
Mr. Justin Seastrand
March 25, 2009
Page 2

2. If project transmission lines are not placed underground, we recommend that SCE develop joint projects with Public Works to enhance adjacent SCE and Los Angeles County Flood Control District right of ways with water quality and/or passive recreation amenities in order to mitigate the aesthetic impact of the project on the San Gabriel River Bicycle Trail and the San Gabriel River Corridor Master Plan projects as well as the reduced useable area surrounding the larger and/or increased number of towers.

3. Substations and/or towers should be kept out of natural drainage pathways.

4. The proposed project may affect several Los Angeles County Flood Control District facilities. Some of the facilities include: Eaton Wash, San Gabriel River, and the Santa Fe Spreading Grounds. At this time, we cannot comment on the degree of impact this project would have until more specific information such as construction plans at a standard scale are available. SCE should obtain permits through Public Works’ Construction Division for any work within the Los Angeles County Flood Control District easements and/or right of ways.

5. Prior to construction, grading permits must be obtained for all access roads within the County of Los Angeles jurisdiction. Grading permits can be obtained through Public Works’ Building and Safety Division.

Traffic/Access

Any proposed public road closure and detour, towers and/or transmission lines within public road right of way, or any USFS permitted locations, will require a construction permit from Public Works’ Construction Division.

Geology/Soils

1. All or portion of the site is located within potentially liquefiable and earthquake-induced landslide areas per the State of California Seismic Hazard Zones Map—Del Sur, Sleepy Valley, Lancaster West, Ritter Ridge, Pacifico Mountain, Acton, Pasadena, Azusa, Mt. Wilson, El Monte, Baldwin Park, Whittier, La Habra, and Yorba Linda Quadrangles. Site-specific geotechnical reports addressing the proposed development and recommending mitigation measures for geotechnical hazards should be included as part of the EIR.
Comment Set A.8, continued: County of Los Angeles, Department of Public Works

Mr. John Boccio
Mr. Justin Seastrand
March 25, 2009
Page 3

2. On page 4.7-29, a discussion is made of the impacts of fault rupture on the project. Under APMs GEO 1 and 2 the towers will undergo geotechnical and geological analysis, and will implement design and construction features that will reduce the impact due to fault rupture. However, the mitigation measure does not include ensuring that the towers are not built upon any active fault traces. SCE should ensure that the substations and/or towers be kept a safe distance away from an active fault.

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921.

Very truly yours,

GAIL FARBER
Director of Public Works

DENNIS HUNTER, PLS PE
Assistant Deputy Director
Land Development Division

cc: Chief Executive Office (Lari Sheehan)
Regional Planning (Hsiao-Ching Chen, Paul McCarthy)
Response to Comment Set A.8: County of Los Angeles, Department of Public Works

A.8-1 Thank you for expressing your opinions regarding the 66-kV tower relocations described in Alternative 2. Alternative 7 identifies underground routes for the Rio Hondo-Jose-Mesa 66-kV subtransmission line along Segment 7, through the River Commons and Whittier Narrows Recreation area (See Draft EIR/EIS, Section 2.7 and Figure 2.7-1). Please see the response to Comment A.17-10 and Appendix H, Section H.2, General Response GR-7 in the Final EIR approved by the CPUC for further discussion. Your comments will be shared with the federal decision-makers who are reviewing the Project.

A.8-2 As described in the Draft EIR/EIS and the Alternatives Screening Report (Appendix A, Section 3.2.11), there are limitations to placing transmission lines underground, especially high voltage lines, such as 500-kV transmission lines. (See also, Appendix H, Section H.2, General Response GR-7: Undergrounding of Transmission Lines.) The Draft EIR/EIS analyzes two alternatives involving underground lines – Alternative 5 is a concept for placing 500-kV lines underground in a tunnel for a portion of Segment 8A and Alternative 7 includes placement of 66-kV lines underground by direct burial along the San Gabriel River in Segment 7 (See Draft EIR/EIS, Section 2.7 and Figure 2.7-1). Your suggestion for joint projects will be passed on to SCE. Please note that any use or development of transmission ROWs will need to be implemented in a manner that is consistent with the ROW’s primary purpose as a transmission corridor, which places necessary restrictions on any joint-use projects. In addition, the comment includes no evidence that enhancement of rights-of-way with water quality and/or passive recreation amenities would minimize the aesthetic impacts of the proposed Project, or that a reduction in the useable area surrounding the proposed towers is an environmental impact under NEPA.

A.8-3 Potential impacts related to hydrology and water quality are addressed in Section 3.8 of the Draft EIR/EIS, the Final EIR, and this Final EIS. The commenter notes that project infrastructure should be kept out of “natural drainage pathways.” To clarify the terminology used, a “natural drainage pathway” could refer to a dry wash or ephemeral waterway (flows only in direct response to precipitation), an intermittent waterway (flows most of the year but is dry for weeks or months at a time), and/or a perennial waterway (flows continuously throughout the year). The Project does not include placement of any infrastructure within a perennial waterway. However, some Project features may be placed within dry washes and/or ephemeral waterways, and it may be necessary to locate some towers within intermittent waterway(s). In addition, some transmission towers would be placed in areas subject to periodic overland flow and flooding, such as the Whittier Narrows Flood Control Basin, and some broad, ephemeral washes in southern Kern County. However, as required by Applicant-Proposed Measure (APM) HYD-7 (Flood and Erosion Structure Damage Protection), which is part of the Project design, aboveground Project features including transmission line towers and substation facilities would be designed and engineered to withstand potential flooding and erosion hazards. Therefore, although the Project may include placement of some above ground features within a “natural drainage pathway,” such as a dry wash or an ephemeral or intermittent waterway, all infrastructure associated with the Project would be designed and engineered to withstand potential flooding and erosion hazards.
Flood control facilities including Eaton Wash, the San Gabriel River, and the Santa Fe Flood Control Basin are discussed in Section 3.8 of the Draft EIR/EIS, the Final EIR, and this Final EIS. Design-level construction plans for the Project are not available at this time, as such plans are would typically developed during the final engineering process, after the environmental review process is complete and the federal decision-makers have made a decision on the Project.

Section 3.8 of the Draft EIR/EIS, the Final EIR, and this Final EIS further describes that the Project proponent (SCE) would obtain all required water quality permits and demonstrate compliance with such permits, including floodplain management ordinances required by FEMA, as additionally specified by Mitigation Measure H-1a (Implement an Erosion Control Plan and demonstrate compliance with water quality permits).

As described in Section 1.3 of the Draft EIR/EIS, the Final EIR, and this Final EIS, no local discretionary approvals (e.g., use permits) are required of SCE for non-federal lands because the CPUC has preemptive jurisdiction over the construction, design, and operation of SCE facilities in California. CPUC’s General Order 131-D requires SCE to consult with local agencies to minimize Project conflicts with local conditions. As such, the CPUC encourages SCE to obtain encroachment permit(s) as necessary for work within the Los Angeles County Flood Control District easements and/or right of ways. On federal lands, encroachment permits from local jurisdictions would be required where applicable.

A.8-5 As noted in the Draft EIR/EIS, the Final EIR, and this Final EIS Section 1.3 under “Other Approvals Required,” “the County of Los Angeles Public Works Department would likely require that SCE obtain permits for road use, excavation activities (for the cutting of public roadways), encroachment (of the public ROW), and construction activities.” For work authorized on federal lands, SCE would be required to coordinate with the Los Angeles County Public Works Department to obtain any applicable grading permits.

A.8-6 Thank you for the information. The Forest Service understands and acknowledges the need for permits from the Department of Public Works for public road closures, detours, and/or any work with a public ROW. Section 1.3 of the Draft EIR/EIS, the Final EIR, and this Final EIS describes the need for ministerial permits from local agencies for construction activities, including permits from the Department of Public Works. As discussed in Section 3.13.3.3 of the Draft EIR/EIS, construction of the proposed Project could potentially affect transportation ROWs, access, traffic flow, and parking on public streets and highways. Therefore, it would be necessary for SCE and/or the construction contractor to obtain encroachment permits or similar legal agreements from the public agencies responsible for each affected roadway or other transportation ROW. Such permits are needed for ROWs that would be crossed by the transmission line as well as for where transmission line construction activities would require the use of a public ROW for a parallel installation. These encroachment permits would be issued by Caltrans, the counties of Kern, Los Angeles, and San Bernardino, as well as the numerous cities through which the proposed transmission route traverses.

A.8-7 Site-specific geotechnical reports for the Project are not available at this time. The high cost of such studies means that utilities are typically unwilling to undertake them until there is some degree of certainty regarding decisions to be made by the Lead Agencies. Site-specific geotechnical investigations would typically be conducted during the final engineering process,
after the environmental review process is complete and federal decision-makers have made a decision on the Project.

As discussed in the Final EIS Section 3.7 (Geology, Soils, and Paleontology), APM GEO-2 states that prior to final design of substation facilities and T/L tower foundations, a geotechnical study would be performed to identify site-specific geologic conditions and potential geologic hazards in enough detail to support good engineering practice. The geotechnical study would be performed by professional civil or geotechnical engineers and engineering geologists licensed in the State of California and would provide design and construction recommendations, as appropriate, to reduce potential impacts from geologic hazards or soil conditions. However, this measure does not identify items to be completed as part of the geotechnical study to identify areas of unstable slopes. Implementation of Mitigation Measure G-3 (Conduct geological surveys for landslides and protect against slope instability) adds specific requirements to the planned geotechnical investigations to be completed prior to final Project design.

A.8-8 Mitigation Measure G-4, in Section 3.7.6.1 of the Final EIS and formerly identified as Mitigation Measure G-4a in the Draft EIR/EIS, requires fault evaluation studies within active fault zones to accurately locate fault traces and prevent location of towers or other structures on the fault. The title of Mitigation Measure G-4 has been changed to match the specific language contained in the measure. This measure would not allow SCE to place any Project structures on the traces of active faults. The revised title of Mitigation Measure G-4 is below.

G-4 Avoid placement of Project structures within active fault zones. Prior to final Project design SCE shall perform a fault evaluation study to confirm the location of mapped traces of active and potentially active faults crossed by the Project route or other Project structures. For crossings of active faults, the Project design shall be planned so as not to locate towers or other Project structures on the traces of active faults; and, in addition, Project components shall be placed as far as feasible outside the areas of mapped fault traces. Compliance with this measure shall be documented to the CPUC and FS in a report submitted for review at least 60 days prior to the start of construction.
Comment Set A.9: California Regional Water Quality Control Board

California Regional Water Quality Control Board
Santa Ana Region

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 • FAX (951) 781-6288 • TDD (951) 782-3221
www.waterboards.ca.gov/santaana

April 1, 2009

John Boccio/Justin Seastrand
California Public Utilities Commission and U.S. Forest Service
C/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

DRAFT ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL IMPACT STATEMENT, CALIFORNIA PUBLIC UTILITIES COMMISSION AND U.S. DEPARTMENT OF AGRICULTURE, FOREST SERVICE -- TEHACHAPI RENEWABLE TRANSMISSION PROJECT, PORTION FROM PUENTE-CHINO HILLS TO MIRA LOMA, SAN BERNARDINO AND ORANGE COUNTIES, SCH# 2007081156

Dear Messers. Boccio and Seastrand:

Staff of the California Regional Water Quality Control Board, Santa Ana Region-8 (Regional Board) have reviewed the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) for the above-referenced proposed upgrade of the Southern California Edison (SCE) electrical transmission lines and new infrastructure (Project). The Project will be constructed in rights-of-way (ROW) along a 173-mile route between the Tehachapi Wind Resource Area in southern Kern County, National Forest lands in the San Gabriel Mountains, and the Mira Loma Substation in eastern Ontario, located immediately within San Bernardino County at the border with Riverside County. Our comments pertain to the distal portion of the route between the City of Chino Hills and the Mira Loma Substation, with its four route Alternatives across Chino Hills State Park and a small portion of Orange County (Carbon Canyon).

We believe that the MND should incorporate the following comments in order for the project to best protect water quality standards (water quality objectives and beneficial uses) contained in the Water Quality Control Plan for the Santa Ana River Basin (Region 8 Basin Plan):

1. Much of the work involves the replacement or augmentation of existing lattice-structure towers with taller modern towers and tubular poles. The DEIR/DEIS is thorough about citing likely named/unnamed streams that would receive fill for stream crossing, construction, and future maintenance in Section 3.4, Biological Resources (DEIR/DEIS Vol.1) and Section 3.8, Hydrology and Water Quality (Vol.2). Riparian Conservation Areas (3.4-126) are designated by criteria from the U.S. Department of Agriculture. We stress avoidance of natural drainages to the greatest extent possible, and where impacts to beneficial uses cannot be avoided, mitigation for the loss of beneficial uses may be required and should be planned for.

California Environmental Protection Agency
Likewise, hydromodification (including erosion) of natural drainages must be prevented by the Project.

2. The DEIR/DEIS recognizes, but does not delineate, jurisdictional waters subject to the California Department of Fish and Game and the U.S. Army Corps of Engineers (USACE). The Executive Summary and Table 1-1 (Required Permits) should reiterate what is stated on 3.8-20, that a Clean Water Act (CWA) Section 401 Water Quality Standards Certification (Certification) from the Regional Board is a prerequisite for USACE issuance of a CWA Section 404 permit. Certifications1 require appropriate mitigation measures, which the final EIR/EIS could already begin to discuss.

Where the Project’s jurisdictional study (and subsequent USACE staff determination) may find that wetlands or other surface waters are isolated from waters of the U.S. and therefore outside of federal jurisdiction, these so-called “isolated waters” are nevertheless waters of the state. Consequently, a project that impacts them may be subject to individual waste discharge requirements (WDRs) from the Regional Board, pursuant to the California Water Code.

3. Executive Summary Table ES-3, listing Project effects and mitigation measures (ES-18), states that losses of certain wetlands and riparian habitat for special-status species (Santa Ana sucker; least Bell’s vireo, etc.) would be cumulatively significant and unavoidable. We respond that according to the Clean Water Act, there must be no net loss of wetlands. Mitigation Measure B1-a should be more specific about how mitigation for impacts to water bodies will occur, for example, through several projects restoring the equivalent full ecological function of the impacted water bodies.

4. The State Water Resources Control Board is mentioned in Executive Summary Table 1-1, with regard to the General Permit for Storm Water Discharges Associated with Construction Activities (SWRCB Order No. 99-08-DWQ) and the need for Storm Water Pollution Prevention Plans. However, the EIR/EIS should also reflect that County/City staff will regulate the Project through the requirements of Order No. R8-2002-0012, the Regional Board’s “Waste Discharge Requirements for the San Bernardino County Flood Control District, the County of San Bernardino, and the Incorporated Cities of San Bernardino County within the Santa Ana Region Wide Urban Storm Water Runoff (NPDES Permit No.

1 The issuance of a 401 Certification represents a determination by the Executive Officer that discharges of waste to waters of the U.S. that are associated with the referenced project will comply with the applicable provisions of Sections 301 (Effluent Limitations), 302 (Water Quality Related Effluent Limitations), 303 (Water Quality Standards and Implementation Plans), 306 (National Standards of Performance), and 307 (Toxic and Pretreatment Effluent Standards) of the Clean Water Act, and with other applicable requirements of State law. In order for such a determination to be meaningful, projects subject to Certification are evaluated for their direct, indirect, and cumulative impacts to waters of the U.S., specifically, impacts to water quality standards. Such impacts must be mitigated to receive a Certification. Information concerning Section 401 certification can be found at www.swrcb.ca.gov/wqcb8/html/401.html.
Comment Set A.9, continued: California Regional Water Quality Control Board

Messers Boccio and Seastrand

CAS618036),” also known as the San Bernardino County municipal separate storm sewer system, or “San Bernardino County MS4” permit. Order No. R8-2002-0012 is currently being revised; the DEIR/DEIS and the Project should reflect the most recent iteration of the San Bernardino County MS4 permit.

For Orange County sites, the following applies: the Regional Board's Waste Discharge Requirements for Orange County (NPDES Permit No. CAS618030, Order No. R8-2002-0010, Areawide Urban Storm Water Runoff Permit for the County of Orange, Orange County Flood Control District, and Incorporated Cities of Orange County within the Santa Ana Region), also known as the Orange County municipal separate storm sewer system, or “Orange County MS4” permit. All development must conform to the Water Quality Management Plan (WQMP) requirements of the two respective MS4s, by implementing a variety of structural and non-structural BMPs controlling pollutants from both point sources and non-point sources (NPS). The EIR/DEIS should specify, much as possible, what those BMPs will be for these permits and for the Project's Erosion Plan.

5. Aside from the above-referenced stormwater runoff permits, another National Pollutant Discharge Elimination System (NPDES) permit is issued by the Regional Board for projects that will have dewatering or other wastewater discharges to surface waters of the state. Regional Board Order No. R8-2009-0003, NPDES No. CAG998001, is a newly revised regional general *de minimus* permit applicable to most of these discharges. WDRs may also be required for discharge of wastes to land. Further information can be obtained by contacting the Regional Board’s Regulations Section staff at (951) 782-4130.

If you have any questions, please contact Glenn Robertson at (951) 782-3259, grobertson@waterboards.ca.gov, or me at (951) 782-3234, or madelson@waterboards.ca.gov

Sincerely,

Mark G. Adelson, Chief
Regional Planning Programs Section

cc:  State Clearinghouse
      U.S. Army Corps of Engineers, Los Angeles – Jason Lambert
      U.S. Fish and Wildlife Service, San Bernardino Co. – Nancy Ferguson
      California Department of Fish and Game, Ontario – Michael Flores/Anna Milloy
      SWRCB, Water Quality Standards Certification – Bill Orme

X:Groberts on Magnolia/Data/CEQA/CEQA Responses/DEIR-Southern Calif Edison-Transmission Line Replacement Project.doc

California Environmental Protection Agency
Response to Comment Set A.9: California Regional Water Quality Control Board

A.9-1 Thank you for your comment regarding impacts to natural drainages, including the potential for erosion and loss of beneficial uses. Section 3.8 (Hydrology and Water Quality) requires mitigation measures where the implementation of specified actions would minimize, reduce, or avoid such impacts to the maximum extent feasible. The Project does not include placement of any infrastructure within a perennial waterway. However, some Project features may be placed within dry washes and/or ephemeral waterways, and it may be necessary to locate some towers within intermittent waterway(s). In addition, some transmission towers would be placed in areas subject to periodic overland flow and flooding, such as the Whittier Narrows Flood Control Basin, and some broad, ephemeral washes in southern Kern County. However, as required by Applicant-Proposed Measure (APM) HYD-7 (Flood and Erosion Structure Damage Protection), which is part of the Project design, aboveground Project features including transmission line towers and substation facilities would be designed and engineered to withstand potential flooding and erosion hazards. Therefore, although the Project may include placement of some aboveground features within a “natural drainage pathway”, such as a dry wash or an ephemeral or intermittent waterway, all infrastructure associated with the Project would be designed and engineered to withstand potential flooding and erosion hazards.

A.9-2 The suggested revisions have been incorporated into Table 1-1 (Required Federal and State Permits and Approvals), indicating that a CWA Section 401 Water Quality Standards Certification from the Regional Board would be obtained as a prerequisite for USACE issuance of a CWA Section 404 permit. Section 3.4.3.1.1 (Regulated Habitats) of the Final EIR, incorporated by reference in this Final EIS in Section 3.4, addresses jurisdictional waters of the California Department of Fish and Game and the USACE. As described in Section 3.4.6.1, any Project activities that would involve modification of the bed or bank of a State- or US-jurisdictional waterway would be regulated by the CDFG, Regional Water Quality Control Board (RWQCB), and USACE. Additionally, Project impacts relevant to waste discharge requirements are assessed under Significance Criterion HYD1 (Violate any water quality standards or waste discharge requirements, create any substantial new sources of polluted runoff, or otherwise degrade water quality) of the Hydrology and Water Quality analysis presented in Section 3.8 of the Final EIS.

A.9-3 Section 3.4 of the Final EIS indicates that implementation of the proposed Project could result in direct loss of wetland and riparian habitat that supports sensitive wildlife including least Bell’s vireo. In addition, cumulative impacts to wetland and riparian habitat, should they occur, would be considered cumulatively significant and unavoidable based on the extensive historical loss of this type of habitat throughout southern California. Implementation of Mitigation Measure B-1a requires SCE to fully mitigate for temporary and permanent impacts to wetland and riparian habitats. This measure contains proposed mitigation ratios, methods to ensure compliance with restoration goals, and performance criteria to meet regulatory requirements. Although not stated in the text of Mitigation Measure B-1a, SCE will also have to comply with the provisions of regulatory permits including the CDFG Streambed Alteration Agreement, State 401 Water Quality Certification, and U.S. Army Corps of Engineers 404 permits. However, in order to further clarify that wetlands would be subject to no net loss the text of the Final EIS has been revised.
As described in Section 1.3 (Agency Use of this Document) of the Final EIS, SCE would be required to obtain all ministerial building and encroachment permits from local jurisdictions. As part of this requirement, SCE would be responsible for ensuring that the appropriate jurisdictional bodies are contacted. Your comment will be shared with them to assist in this regard.

Applicable permits would include those required for compliance with waste discharge requirements and storm water runoff regulations. Section 3.8.3.1 (Hydrology and Water Quality) of the Draft EIR/EIS was revised to reflect expected revisions to NPDES construction guidelines and permits and the State Board’s adoption of the new Construction General Permit.
Comment Set A.10: Karen Bristow, City of Chino Hills Planning Commission

CALIFORNIA PUBLIC UTILITIES COMMISSION
USDA FOREST SERVICE
Draft EIR/EIS Comments
Proposed Tehachapi Renewable Transmission Project

Date: March 19, 2009
Name*: Karen S. Bristow
Affiliation (if any):* City of Chino Hills Planning Comm.
Address*: 15225 Rolling Ridge Dr.
City, State, Zip Code: * Chino Hills, CA 91710
Telephone Number: * 909 597-2051
Email:*

I have lived in Chino Hills for forty years and have been involved in the direction and growth of Chino Hills, every one of these years. This beautiful city evolved through the efforts of people who love it here, the celebrate being a healthy city every year, and look for ways to make it better. We are a planned city, unusual for its large amount of open space. This beautiful open space is where butterflies are taking advantage of us. You simply start in the town, but the paths lead into densely populated areas. Your intuition best is to hike and learn at once a danger to human &

February 2009

Submit comments by mail using this comment sheet (fold, stamp, and mail); insert additional sheets if needed. Comments may also be submitted to the project hotline at (888) 331-9897 or emailed to TRTP@aspeneg.com. Comments must be postmarked by April 6, 2009.
Response to Comment Set A.10: Karen Bristow, City of Chino Hills Planning Commission

A.10-1 Thank you for your comment. Your comment will be shared with the federal decision-makers who are reviewing the Project.

A.10-2 Thank you for your comments. Air emissions and earthquake risks are discussed in Sections 3.3 and 3.7 of the Final EIS, respectively.

A.10-3 Thank you for expressing your concerns and opinions. Your comment will be shared with the federal decision-makers who are reviewing the Project.
Comment Set A.11: City of Chino

April 2, 2009

Mr. John Boccio/Mr. Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

RE: Draft Environmental Impact Statement/Environmental Impact Report for
the Proposed Tehachapi Renewable Transmission Project

Dear Mr. Boccio/Mr. Seastrand:

Thank you for providing the City of Chino an opportunity to review and comment
on the Draft Environmental Impact Statement/Environmental Impact Report
(EIS/EIR) for the Proposed Tehachapi Renewable Transmission Project.

The City of Chino believes that the Draft EIS/EIR is inadequate. It fails to
adequately address the environmental impacts of the project in the following
areas:

Noise Impacts

Existing ambient noise levels (Leq) were measured at various points in Segment
8. These ambient noise levels are assumed by the City to include existing
corona noise from the 220 kV transmission lines. The study models the corona
noise for the proposed 500 kV transmission line. The report asserts that
because the new corona noise is below 55 dBA, it would comply with the City's
noise ordinance. We are concerned with this assumption because future
ambient noise levels were not modeled based on the corona noise produced
from the 500 kV transmission lines. We are not able to determine if future
ambient noise levels, including the corona noise from the 500 kV, would exceed
the City's current standards. Additionally, during wet-weather conditions, the
corona noise from the 500 kV lines could exceed the City's nighttime noise
threshold of 50 dBA. The California Environmental Quality Act requires the
Comment Set A.11, continued: City of Chino

Mr. John Boccio/Mr. Justin Seastrand  
CPUC/USDA Forest Service  
Re: Draft EIS/EIR for the Proposed Tehachapi Renewable Transmission Project  
April 2, 2009  
Page 2

The author of environmental documents to provide substantial evidence describing an impact or discussing its non-impact. The City believes that the future ambient noise level, including the corona noise from 500 kV lines, has a potential to exceed the day and nighttime noise levels, creating a substantial adverse impact to residents. The future ambient noise levels, including the estimated corona noise generated from the proposed transmission lines – both 500 and 220 kV – must be modeled for an accurate assessment of the noise impacts on adjacent properties, both residential and non-residential.

Proposed construction noise is a substantial adverse impact, as the estimated construction noise of 83 dBA 50 feet from the easement would exceed the City's maximum 65-70 dBA standard for residential land uses. Construction of the proposed project will also involve the use of heavy equipment, including helicopters to remove the existing 220-kV towers. The helicopters would operate anywhere from 6 to 8 hours per day, generating substantial noise and dust that will affect residents in East Chino and Yellowstone Circle. More information is needed about the timing of construction, the removal of existing towers, and the construction of the proposed towers. Furthermore, the DEIS/EIR should address the duration of time that residents will be exposed to this type of construction noise and what mitigation measures will be taken to protect residents from the health and safety risks.

Earth-borne oscillation (vibration) caused by the operation of construction equipment was not studied for the proposed project in the DEIS/EIR. This type of vibration has the potential to cause property damage to adjacent properties during construction. The DEIS/EIR should evaluate this impact.

Safety/Hazards

The electromagnetic field (EMF) generated by the proposed transmission lines will increase to approximately 30mG at the southern edge of the easement, which the report states is no stronger than what is generated by many common household appliances. However, what type of impact will this have on Chino residents being exposed to this type of magnetic field 24 hours a day? The DEIS/EIR only cites a few conflicting studies concerning the long-term health impacts of EMF on humans. The DEIS/EIR should further evaluate potential health impacts, considering the proposed close proximity of the proposed 500 kV transmission lines to existing residences.

The safety of people living and working in areas adjacent to the easements is a major concern. In the event of a structural failure of a pole or tower, conductor breakage, a construction accident, or natural disasters such as wind storms and
Comment Set A.11, continued: City of Chino

Mr. John Boccio/Mr. Justin Seastrand
CPUC/USDA Forest Service
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earthquakes, the width of the existing easement and proposed placement of the poles would allow these structures to fall onto adjacent private property, causing severe property damage as well as human casualties. There are many documented instances of structural failure and conductor breakage due to high intensity winds in the United States and other developed countries; there are also documented lattice tower failures resulting from the 1992 Northridge earthquake.

The DEIS/EIR only states that structural failure is highly unlikely due to wind loads and earthquakes. The document should describe in detail the design specifications and safety standards for the proposed single-pole and lattice tower designs, including maximum wind speed and maximum ground acceleration design standards; it should also include statistics on the incidence of both structural failure and conductor breakage, in order to quantify the probability of this type of event occurring. In addition, construction safety should also be discussed, including the probability of an accident based on past records, especially involving heavy equipment and aerial operations.

The City has been concerned about the safety of the Edison Avenue substation for many years. The amount of conduit and transformer devices in close proximity to Edison Avenue is significant, especially given the fact that there is little or no barrier to prohibit a vehicle or truck from creating a significant hazard. With the addition of the 500 kV lines the hazard seems even more dangerous. To help mitigate the added risks associated with the project, the City believes a decorative block wall, or equivalent, must be constructed as a protective barrier around the facility. In addition, the City requests that such improvements be coordinated with the City to ensure a high aesthetic character.

Land Use

The existing easement that is proposed to be utilized for the new 500 kV transmission lines and towers runs across many properties within the City of Chino. These properties represent many different land uses, including:

- 12 single-family residences on Yellowstone Circle, including a lot maintained by the homeowner's association for recreational vehicle storage;
- Ayala Park, which contains areas for both passive and active recreation, parking facilities, and walking/bicycle trails;
- The YMCA recreational facility at Ayala Park;
- Rancho del Chino Shopping Center located at the southeast corner of Eucalyptus and Ramona Avenues, which contains parking and drive aisles;
Comment Set A.11, continued: City of Chino

Mr. John Boccio/Mr. Justin Seastrand
CPUC/USDA Forest Service
Re: Draft EIS/EIR for the Proposed Tehachapi Renewable Transmission Project
April 2, 2009
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- Inland Hills Church located at 14670 Ramona Avenue where parking and ball fields exist within the easement area;
- Several industrial properties between Ramona and Central Avenues that currently utilize the easement area for vehicle/truck parking and outdoor storage;
- A plant nursery near Edison Avenue that uses the easement area for plant storage; and
- A plant nursery, proposed equestrian park, single family residential property with horse keeping, and required parking for CrossPoint Church.

Will the construction of the 500 kV line place any new limits on any of the aforementioned uses? Will the rights of the property owners to utilize the easement area be diminished with the larger 500 kV lines? Will there be restrictions on existing and future recreational uses, or restrictions on landscaping in Ayala Park? There is no discussion about the impacts associated with any potential increased restrictions on the use of the easement resulting from the project. The DEIS/EIR must analyze these impacts.

In the Rancho del Chino shopping center, the project proposes to remove the existing 220-kV tower and place a new 500-kV tubular steel pole approximately 125' east of the existing tower. The DEIS/EIR should discuss the resulting modifications to the easement area, including the parties responsible for modifications to the parking lot and drive aisles.

Additionally, the City owns two water well sites in the City of Ontario. One is located at the southeast corner of Schaefer and Campus Avenues, and the second site is located at the northeast corner of Schaefer and Bon View Avenues. These two sites are bisected by the SCE easement being considered for the proposed alignment; therefore, an analysis should be conducted to assess potential impacts on the well sites, including their appurtenances and any limitations regarding the use of the property, resulting from the project.

Aesthetics

The DEIS/EIR includes photo-simulations (Figures 3.14-52a and 3.14-52b) of Edison Avenue looking east from Central Avenue. It appears that one result of the Tehachapi Project will include the removal of the multiple existing overhead transmission and distribution lines at Ayala Park, as well as other areas between Central and Mountain Avenues. These smaller lines would be replaced by one double-circuit 500-kV line on tubular steel poles. Does the project include relocation or undergrounding of all of these existing lines? The DEIS/EIR should
Comment Set A.11, continued:  City of Chino

Mr. John Boccio/Mr. Justin Seastrand  
CPUC/USDA Forest Service  
Re: Draft EIS/EIR for the Proposed Tehachapi Renewable Transmission Project  
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include a thorough description of the proposed work in this area, including diagrams showing all existing lines and their proposed disposition (relocated, removed, underground) as a result of the project.

The City of Chino also has the following concerns with the project in general:

We are concerned with the overall proposed configuration of the transmission lines running through East Chino (Mountain to Euclid Avenues), especially the proposed 500-kV line along the southern boundary of the easement. In order to lessen the visual, noise, and EMF exposure to East Chino residents, especially the residential units closest to the 500 kV transmission lines and towers, the City recommends that the proposed 220 kV and 500 kV transmission lines and towers be moved to the center of the easement. This could be accommodated, especially with the removal of the idle 220 kV line on the north side of the easement. The City believes that this would be a more preferred plan that would result in less significant impacts.

If the northernmost 220 kV transmission line, though idle, is required to remain, this would indicate that it will be utilized in the future. The DEIS/EIR should address the environmental impacts of this line as if it were energized.

The location of structure M68-T1 (198-foot tall lattice tower), located along the proposed 500-kV transmission line in East Chino west of Fern Avenue, is particularly problematic. Based upon the aerial photos provided by SCE, an existing 220-kV contemporary tower approximately 150 feet tall will be removed and replaced with a proposed double circuit 500-kV lattice tower approximately 198 feet tall. This proposed tower would be located approximately 60 feet from the edge of the right-of-way. Existing homes are located approximately 80 feet from the center of the proposed tower. This could result in the base of the tower being only 40 feet from existing residences, resulting in the conductors being within 20 feet (measured horizontally). In addition, the drip-line for the power lines on the lattice tower structure will be significantly closer than existing. The City believes that the visual, noise, and safety impacts at this location are unacceptable. We have similar concerns about the proposed 500 kV tubular steel tower located west of San Antonio Avenue. As stated above, with the ample width of the existing easement in these areas, these impacts could be reduced if the proposed location of the lines were moved farther away from the homes.

In the Yellowstone Circle neighborhood, the center of structure M63-T3 is 75 feet from the edge of the easement, and will be 185 feet tall, more than twice the height of the existing 220 kV tower. Additionally, the conductors on the proposed
Comment Set A.11, continued: City of Chino

Mr. John Boccio/Mr. Justin Seastrand
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500 kv line would be approximately 60 feet from the edge of the easement. Many of the existing homes in this area are within ten feet of the edge of the easement, with rear yards that extend into the easement. This condition will have a severe negative visual impact on the existing residential neighborhood, and poses noise and safety impacts to the residents that are not sufficiently mitigated.

Though the project potentially impacts more residential properties in the City of Chino Hills, the City of Chino is similarly impacted, especially with regard to the proposed location of the 500 kv transmission line and its adjacency to existing residential and public land uses. The City of Chino believes that the project alternatives proposed by the City of Chino Hills are feasible, and would greatly reduce the impact of the project on the citizens of Chino.

Thank you again for providing the City of Chino the opportunity to review the Draft EIS/EIR for the Tehachapi Renewable Transmission Project. Should you have any questions, please feel free to contact me at (909) 591-9811.

Sincerely,

Charles E. Coe, AICP
Director of Community Development

cc: Community Development Department File
Patrick J. Glover, City Manager
Brent Arnold, City Planner
Response to Comment Set A.11: City of Chino

A.11-1 The information provided in the comment resulted in a correction that was previously presented in the Final EIR published by the California Public Utilities Commission (CPUC) in October 2009. This correction does not have a substantial effect on the analysis or conclusions presented in the Draft EIR/EIS. This change only affects non-federal jurisdiction and has already been considered by the CPUC in its Decision.

As future ambient noise conditions at any one point source are unpredictable and would be generated by a number of mobile and stationary noise sources at receptor locations, Draft EIR/EIS Section 3.10 presents the modeled future corona noise associated with the proposed Project (Alternative 2) to demonstrate the impact it would have on future ambient noise conditions.

Table 3.10-10 of the Final EIR was revised by the CPUC to reflect that the modeled operational noise impacts of the proposed Project would not comply with City of Chino Municipal Code Noise Ordinance. Specifically, under future wet weather conditions, the range of future corona noise along the portion of Segment 8 located in the City of Chino would be between 56 and 58 dBA at the edge of the ROW. The City’s 30-minute exposure threshold for noise states that noise levels should not exceed 55 dBA from 7 am to 10 pm and 50 dBA from 10 pm to 7 am.

A.11-2 Table 3.10-9 in the Draft EIR/EIS identifies the City of Chino Municipal Code Noise Ordinance pertaining to construction noise. As noted, the City of Chino Municipal Code Noise Ordinance does not contain regulations specifying construction noise level thresholds. As noted on Draft EIR/EIS page 3.10-23, despite the implementation of APMs NOI-1, NOI-3 and NOI-4 and Mitigation Measures N-1a and N-1b, maximum construction noise levels would substantially exceed ambient noise conditions along the proposed Project (Alternative 2) route, and would affect sensitive noise receptors.

Helicopters would only be utilized in Chino to run sock line as part of the conductor stringing process after transmission structures have been constructed. Helicopters would operate for very short periods at any single location because running sock line is a relatively quick operation.

In response to concerns concerning construction timing, as presented, APM NOI-1 would ensure that construction activities would either comply with local noise ordinances pertaining to daily construction activity timing, or SCE would obtain a variance from each affected jurisdiction, if there is a need to work outside of normal daytime, weekday hours (Draft EIR/EIS, Table 3.10-8). In addition, Draft EIR/EIS Section 2.2.12 (Description of Alternatives) provides information on construction hours, use of construction equipment, and proposed construction activities.

A.11-3 As a result of this comment, minor modifications were made to the description of Impact N-1 in the Final EIR, but did not result in a change in the impact analysis or conclusions. These modifications were considered by the CPUC in its Decision on the Project.

Potential vibration impacts during construction were addressed in the Draft EIR/EIS on Page 3.10-22. The analysis presented in the Draft EIR/EIS (based on Federal Transit Authority data) concludes that vibration issues are usually confined to short distances (i.e., 500 feet or
less) from the source but no ground-borne vibration would affect sensitive noise receptors. Where applicable, policies pertaining to vibration thresholds were evaluated for each jurisdiction in Draft EIR/EIS Table 3.10-9.

A.11-4 As noted in the Draft EIR/EIS, many studies have been conducted related to potential health effects of EMF from power lines. The power flow levels and calculated EMF are used to identify potential field strengths in the vicinity of the line and how certain field mitigation techniques may be used to result in lower field strengths. The calculated field strength is not intended to predict the actual field strength in the vicinity of the transmission line since these will be highly variable over the life of the transmission line. The field strength will vary significantly over time, including variation on a daily, seasonal and year-to-year basis and the use of electricity changes in the region. There is no consensus in the scientific community regarding the health risks associated with EMF exposure. Therefore, conclusions regarding this concern are not analyzed in the Draft EIR/EIS or in this Final EIS. In addition, there are no federal or state standards limiting human exposure to EMF from transmission lines or substation facilities. Please see Draft EIR/EIS Section 5.3.1. Please see GR-2 for further discussion of this issue.

A.11-5 Transmission structure failures are extremely rare. Mitigation Measures G-3, G-4a, G-5a, G-5b, and G-6 will be implemented to further reduce the potential for a structure failure. Please see General Response GR-10.

A.11-6 The proposed Project does not include any improvements to the substation located on Edison Avenue (Chino Substation) and, therefore, would not affect any existing traffic safety issues that may exist along roadways adjacent to this facility. As a result, construction of a decorative barrier at this location would not mitigate any of the Project’s impacts and is therefore not required.

A.11-7 Thank you for this information. These existing land uses were considered as part of both the description of existing conditions and the analysis of impacts in the Draft EIR/EIS.

A.11-8 The concerns raised in this comment were addressed in the Final EIR and considered by the CPUC in its Decision on the Project. The Forest Service does not have jurisdiction for the portion of the Project that traversed the City of Chino; however, federal decision makers are aware of the City’s concerns. Please note that no new ROW or easement would be required within Segment 8 through the City of Chino as a result of the proposed Project.

Under SCE’s Easement Policy (Rev. 1, July 7, 2008), it is stated that “Buildings and other permanent structures, both above ground and underground are prohibited within SCE’s ROWs. Examples of permanent structures are pipelines, concrete slabs [i.e., parking lot], foundations, vaults, decks, detention basins, pools, and anything else that is not portable and easily moveable.” In SCE’s Secondary Land Use Policy, it states that SCE “will permit secondary uses of its transmission rights-of-way only when these secondary land uses do not conflict with current or projected first priority use, as determined by the company’s Transmission and Distribution Business Unit (TDBU). Such uses will be low intensity in nature. Other possible low-intensity projects include short-term or overflow parking lots or equestrian stables. Since these are not the preferred uses, SCE will not actively pursue these uses but will consider them on a case-by-case basis.” Previously existing land uses, such as parking lots, that may conflict with SCE’s Secondary Land Use Policy and Transmission Line
Right of Way Requirements will be reviewed by SCE on a case-by-case basis. It should be noted that SCE is currently working towards a system-wide policy regarding land uses under 500-kV T/Ls; however, this policy is not yet in place.

A.11-9 Please see the response to Comment A.11-8 above.

A.11-10 The Cities of Chino and Ontario are underlain by the Chino Subbasin of the Upper Santa Ana Valley Groundwater Basin. The wells noted in the comment are part of the Chino Subbasin and are included in the Draft EIR/EIS’ analysis of the Chino Subbasin. Section 2.2 (Regional Setting: Southern Region) of the Hydrology and Water Quality Specialist Report, which is incorporated by reference to the Draft EIR/EIS, provides a detailed description of the Chino Subbasin. As described in this Specialist Report, total storage within the Chino Subbasin is approximately 18,300,000 acre-feet, with approximately 5,300,000 acre-feet currently in storage. Depth to groundwater in proximity of the Project route is approximately 75 feet or greater bgs (below ground surface) (Draft EIR/EIS, page 3.8-12.). As discussed in Section 3.8 of the EIR/EIS, the maximum construction-related excavation depth is approximately 40 feet bgs and, therefore, no contact with groundwater would occur during construction of the proposed Project and no need for dewatering is expected. (Draft EIR/EIS, page 3.8-33.) No depletion of groundwater supplies or substantial interference with groundwater recharge would result from operation and maintenance of the Project. Other potential impacts to groundwater resources are discussed in Section 3.8 of the Draft EIR/EIS.

A.11-11 The relocation of existing 66-kV overhead lines in the vicinity of Chino Substation is described in Section 2.2.9 of the Draft EIR/EIS Multiple 66-kV lines in the vicinity of the Chino Substation beginning approximately 500 feet west of Central Avenue to Magnolia Avenue would be placed underground. Additional details of these relocations and undergrounding are provided under the sub-heading “220-kV Transmission and 66-kV Subtransmission Relocation.” These components of the Project are not located on federal lands and have already been addressed by the CPUC in its Decision on the Project. They do not affect decisions to be made by the Forest Service or the USACE and the comment does not necessitate any changes to the Final EIS.

A.11-12 As shown on Draft EIR/EIS Figure 2.2-1y, SCE’s existing ROW splits into two separate ROWs at approximately (S8A MP 29.2). The area between these ROWs is not part of SCE’s ROW and, therefore, SCE did not propose to place structures in this area. As shown in Figures 2.2-47 and 2.2-48, the new transmission structures would in fact be placed within the center of the existing ROWs. These components of the Project are not located on federal lands and have already been addressed by the CPUC in its Decision on the Project. They do not affect decisions to be made by the Forest Service or the USACE and the comment does not necessitate any changes to the Final EIS.

A.11-13 The other existing lines in the easements are considered part of baseline conditions and the Draft EIR/EIS assumed their continued existence because the proposed Project does not involve any modifications to those lines. SCE has not indicated any intent to re-energize any idle lines in the transmission easements. The EIS is only required to analyze future actions that are reasonably foreseeable consequences of a proposed project. Also, please note that the subject line is not located on federal lands and its future disposition does affect decisions to be made by the Forest Service or the USACE.
As shown in the cross-section Figures 2.2-45 to 2.2-47, the new double-circuit 500-kV structures would be located in the same location within the ROW as the structures they are replacing. As shown in Figure 2.2-46, the edge of the ROW would be between 40 and 165 feet from the centerline of the new TSPs. Tower placement within the ROW is determined based on SCE and industry design practices and would be designed to meet all such requirements to ensure the safety of all homes/buildings located adjacent/near the ROW.

Noise and visual impacts of the TRTP are discussed in Sections 3.10 and 3.14, respectively, of the Draft EIR/EIS. Corona noise generated by operation of the proposed Project along Segment 8 would result in significant and unavoidable permanent increases to existing ambient noise levels (Draft EIR/EIS, page 3.10-34). No feasible mitigation measures were identified in the Draft EIR/EIS to reduce this impact. The comment’s suggestion to move the lines farther away from the existing homes in order to reduce noise impacts is infeasible due to clearance requirements within the ROW between structures and their associated conductors.

Because of the height of the proposed new structures, moving them further inside the existing ROW would not reduce or eliminate the visual impacts, which would remain adverse and unavoidable as described in the Draft EIR/EIS in Section 3.14.6.1.

With respect to safety issues, please see General Response GR-8 regarding use of narrow ROWs and General Response GR-10 regarding potential failure of transmission structures. Please see General Response GR-2 regarding Electric and Magnetic Fields for further discussion of this issue.

Please see the response to Comment A.11-14. All impacts have been mitigated to the extent feasible. The EIR/EIS concludes that visual impacts in the South Area, including Segment 8, would be adverse and unavoidable (Draft EIR/EIS, pages 3.14-104 through 3.12-109). All adverse and unavoidable impacts have been indentified and will be considered by federal decision-makers.

Thank you for expressing your opinion regarding Alternative 4. Alternative 4 is not located on federal lands and has already been addressed by the CPUC in its Decision on the Project. The Forest Service and the USACE do not have jurisdiction over Alternative 4 as it is not located on National Forest System lands or lands owned by the USACE. The comment does not necessitate any changes to the Final EIS.
Comment Set A.12: City of Chino

April 3, 2009

Mr. John Boccio/Mr. Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

RE: Draft Environmental Impact Statement/Environmental Impact Report for the proposed Tehachapi Renewable Transmission Project – Additional Comments

Dear Mr. John Boccio and Mr. Justin Seastrand:

This is a follow up to our previous letter dated April 2nd. We felt that it was important to communicate that the City is considering an equestrian park within the SCE easement area located at the northeast corner of Mountain and Edison Avenues. While the park is in the planning stages, we would have serious concerns if the upgrade of the power lines from 220-kV to 500-kV limits the availability of the property for this use. Please consider this comment as part of the City’s concerns regarding land use, noted in the City’s April 2nd correspondence regarding the DEIS/EIR.

Please contact me at Chino City Hall should you have any questions at (909) 591-9890.

Sincerely,

Brent Arnold,
City Planner

cc: Community Development Department File
Chuck Coe, Director of Community Development
Tina Sray, Community Services Department
Response to Comment Set A.12: City of Chino

A.12-1 Thank you for communicating the City of Chino’s consideration of developing shared recreational use(s) in the SCE utility corridor. Any shared uses of the SCE utility corridor, such as for equestrian purposes, would be subject to existing easement restrictions. Discussion of existing shared uses of SCE’s utility corridor for recreational purposes is provided in Section 3.15 (Wilderness and Recreation) of the Final EIR. Please note that any use or development of transmission ROWs will need to be implemented in a manner that is consistent with the ROW’s primary purpose as a transmission corridor, which places necessary restrictions on any joint-use projects. Your comment was considered by the CPUC in its Decision. The areas noted are not subject to federal jurisdiction and the comment is not addressed further in this Final EIS.
April 3, 2009

John Boccio
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

SCH # 2007081156

Dear Mr. Boccio:

The Inland Empire District of the Department of Parks and Recreation (State Parks) appreciates the opportunity to comment on the DEIR/EIS for the TRTP. State Parks is a Trustee Agency as defined by the California Environmental Quality Act (CEQA).

State Parks’ mission in part is to provide for the health, inspiration, and education of the people of California by preserving the state’s extraordinary biodiversity and creating opportunities for high quality outdoor recreation. As the stewards responsible for Chino Hills State Park (Chino Hills SP) and Antelope Valley California Poppy State Natural Reserve (California Poppy SNR), we have an interest and concern about contemplated alterations of land use adjacent or within the park. The long-term health of Chino Hills SP and California Poppy SNR is also dependent on the health of the regional ecosystems because the biotic boundaries of the park extend beyond its jurisdictional boundaries.

State Parks fully supports Governor Schwarzenegger’s renewable energy movement to increase procurement from eligible renewable energy resources and address climate change. Already, State Parks has adopted a Strategic Initiative to address global warming. “Cool Parks”, one of the five Strategic Initiatives, identifies climate change as a threat to all that we value and protect in the world.

Under CEQA, any alternative route through Chino Hills SP creates one additional Trustee Agency, which is State Parks, and two additional Responsible Agencies, which are State Parks and the California State Park and Recreation Commission (State Park Commission). As Responsible Agencies, State Parks and the State Park Commission are required to independently consider the environmental effects of the project as shown in the DEIR/EIS and may approve or deny the Lead Agency’s findings.
Comment Set A.13, continued: Department of Parks and Recreation, Inland Empire District

Mr. John Bocchio
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In general, as noted below, we request additional evaluation of Land Use, Natural and Cultural Resources and Visual Resources. The conclusion of the evaluation should provide measures to minimize all potential and definite temporary and permanent impacts to the evaluation’s purpose.

A. Environmentally Superior Alternative

State Parks concurs with the Lead Agency that the Environmentally Superior Alternative within Segment 8A and Segment 4 would be Alternative 2 Southern California Edison’s Proposed Project (Proposed Project) relative only to those portions of Segment 8A involving Chino Hills SP and Segment 4 involving the California Poppy SNR.

B. Other Alternatives

Overall, we find that the Chino Hills Alternative Routes 4A, 4B, 4C, and 4D in Segment 8A are unfeasible for reasons discussed below. We also provide comments on the DEIR/EIS and requests for the final EIR/EIS.

C. Feasibility

1. Pursuant to CEQA Guideline 15126.6(a), an EIR shall describe a range of reasonable alternatives that would feasibly obtain most of the basic objectives of the project, but avoid or substantially lessen significant effects of the project. An EIR is not required to consider alternatives that are infeasible. “Feasibility” means capable of being accomplished in a successful manner, within a reasonable amount of time, taking into account economic, environmental, legal, social and technological factors.

2. The Chino Hills Alternative Routes 4A through 4D in Segment 8A (Chino Hills Alternative) suffers serious issues with legal infeasibility that could prevent accomplishment of the TRTP within a reasonable amount of time. On July 21, 1982, the Public Utilities Commission (PUC) issued D.82-09-093, Order Dismissing Application for Rehearing, Vacating Stay and Granting Application for Modification, addressing the Mira Loma-Serrano transmission line through Chino Hills SP that had been earlier approved in D.82-01-050. In issuing D.82-09-093 the PUC implemented a settlement agreement dated April 7, 1982 between Southern California Edison (SCE) and a local advocacy group precluding the use of double circuit transmission infrastructure within Chino Hills SP and requiring the removal of approximately 5.2 miles of O-line transmission towers and 2.4 miles of 220kv single circuit T/L northern extension within the park.

3. At least three of the four variations of the Chino Hills Alternative, Routes A, B and D, call for double circuit transmission infrastructure. This would put SCE in violation of its settlement agreement. Because the PUC acknowledged that it adopted D.82-09-093 in order to implement the settlement agreement, the Chino Hills Alternative also places the PUC itself in a legally problematic situation. At
Comment Set A.13, continued: Department of Parks and Recreation, Inland Empire District

Mr. John Boccio
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the very least, this issue creates a substantial amount of legal uncertainty and potentially delays successful implementation of the project within a reasonable amount of time.

D. Land Use

1. Adding to this issue of legal and regulatory feasibility is the issue of the Chino Hills SP General Plan. The project, as proposed, is not consistent with the existing General Plan. A General Plan Amendment would need to occur, as the DEIR/EIS correctly concluded, before the Chino Hills alternative could be constructed. (See e.g., pages ES-1, ES-11, 1-1, 1-12, 1-13, 4-47, and 5-6) In testimony before the PUC with respect to the Sunrise Powerlink Project, State Parks estimated that it would generally take about 13 to 15 months to prepare major revisions to a state park general plan for consideration by the State Park Commission, the body responsible for amending those plans. This estimate presumes reliance on a PUC-certified DEIR/EIS to meet the requirements of CEQA. The time frame could be truncated, but it would still result in a delay in the TRTP of a minimum of at least eight months. (Decision 08-12-058, Decision Granting a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project, at p.207.) Even then, there is no requirement that the State Park Commission approve any outside proposal to amend a State Parks General Plan. State Parks generally does General Plans to allow development in line with its mandates and duties and does not have a process to allow outside interests to amend a Parks General Plan. This uncertainty has an effect on the viability and feasibility of the alternative.

2. If the response to the infeasibility is to switch to single circuit infrastructure, then there will be additional land disturbance and right-of-way requirements with associated impacts that will need to be analyzed.

3. The current schedule also does not account for delay that would result from the need to seek amendments to the Chino Hills SP General Plan. The discussion of each of the variations of the Chino Hills Alternative 4 notes that "construction of the new switching station [necessary for the alternative's would take approximately one year to complete; however, depending on the civil improvements required, approximately two years would be required for engineering, permitting and construction. It is assumed that this schedule would be accommodated within the 52 months currently allotted for Segment 8." (See, e.g., Table 4.1-5.) This, however, does not account for the delay and uncertainty necessitated by having to seek approval of amendments from the State Park Commission to the Chino Hills SP General Plan. A 13 to 15 month delay puts this outside the timeframe currently allotted for the segment. That delay could be even greater, depending on issues that arise from any need to access the Chino Hills Alternative route through the Aerojet property.

4. DPR Permit / Approval / Consultation - Right of Entry permit and grant of easement for Alternative 4 across Chino Hills SP. Permits are only issued for projects that comply with the State Park general plans.
Comment Set A.13, continued: Department of Parks and Recreation, Inland Empire District

5. Lands along the northern boundary of Chino Hills SP where several Alternative 4 routes are identified contain significant natural resource value, as well as aesthetic value and act as a buffer to the inner core habitat areas in the interior of the park. These lands have also been identified as key future acquisitions to be included into Chino Hills SP and which guidelines are given in the Chino Hills SP General Plan (p. 71). These lands are significant and important since they include ridgelines and watersheds that currently lead into Chino Hills SP. The DEIR/EIS does not adequately analyze the natural and aesthetic resources of these adjacent lands as it relates to these Chino Hills SP General Plan guidelines. State Parks request further analysis to be completed in order to fully assess the impacts of all Alternative 4 routes in this area.

6. In regards to section 3.9-82 -86 and Table 3.9-21 we concur with DEIR/EIS conclusion that implementation of the Chino Hills Alternative 4 is not consistent with the Chino Hills SP General Plan and would be considered significant and an unavoidable impact (Class I). However, State Parks requests that the final EIR/EIS specifically list the following Chino Hills SP General Plan goals in relation to the Chino Hills Alternative 4A-4D routes:

   a. Natural Resources/Buffers:
      Land uses outside park boundaries can cause significant impacts on parklands. Possible impacts include exotic plant infestations, chemical pollution, predation and competition from domestic pets, wildfire, artificial light and noise, and loss of foraging or nesting habitat. Buffers, such as dedicated open space and agricultural lands, are low-intensive-use areas between the park's boundary and adjacent developments that help to separate conflicting land uses and protect natural habitats from destructive impacts. Goal: Establish, maintain, and protect buffers adjacent to Chino Hills SP (p.58).

   b. Aesthetic Resources
      Visitors to Chino Hills SP enjoy many aesthetic qualities inherent to the park's natural conditions. Some of these include open space, sounds of nature, and scenic views. Impacts to aesthetic qualities are, at times, created by developments, activities, or land uses, within or outside the park, that are incompatible with these qualities. Goal: Protect scenic features from man-made intrusions and preserve the visitor's experience of the natural landscape by minimizing adverse impacts to aesthetic resources (p. 65).

7. Additionally, a number of implementing guidelines for the Aesthetic Resources Goal are directly implicated by Alternative 4 routes and should be listed in the final EIR/EIS:

   a. State Parks will work to reduce the negative impacts of utility easements in the park. All utility companies will be encouraged to reduce the impacts by consolidating easements into fewer or smaller corridors, or by placing...
Comment Set A.13, continued: Department of Parks and Recreation, Inland Empire District

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the equipment underground. State Parks will work with utility companies to remove unnecessary utility roads and reduce road widths, and will discourage any new easements within the park unless mitigated to benefit park resources.

b. Ridgeline and knoll developments outside the park that adversely affect significant views will be discouraged. State Parks will work with park neighbors and local government to review and plan adjacent developments in a manner that protects views.

c. Tranquility and the sounds associated with the park's natural resources will be preserved. Unnatural sounds that adversely affect park resources, values, or visitors' enjoyment will be prevented or minimized (p. 65).

8. The DEIR/EIS does not consider or evaluate the possibility of “under-grounding” the proposed power lines as an alternative within Chino Hills SP. Under-grounding of utility equipment is encouraged and listed as a guideline in the Chino Hills General Plan (p.65). State Parks requests this type of power line placement be identified and evaluated as a possible alternative in the final EIR/EIS.

9. In addition, it should be further identified in the DEIR/EIS that a portion of the Alternative 4C route after the proposed switching station would cross through a designated “Core Habitat Zone” not specifically identified in the DEIR/EIS. This “Core Habitat Zone” is located north of the existing power line easement in the upper Aliso Canyon watershed and is an area of highest biological resource sensitivity in the park. As identified in the Chino Hills SP General Plan (p. 49, 54 & 55):

The primary goal of the Core Habitat Zone is to preserve and protect sensitive plant and animal species and their supporting habitats, as well as to protect the movement of plants and animals within the park and throughout the region. Resource protection will be the foremost consideration for all land use and management decisions.

State Parks requests the final EIR/EIS to identify on all maps the “Core Habitat Zones” within Chino Hills SP and as they relate to Alternative 4 routes. We further request this management goal be specifically listed in the report and that the construction and placement of power lines in the “Core Habitat Zone” would be inconsistent with this primary goal listed in the Chino Hills General Plan.

10. Additionally, State Parks requests the final EIR/EIS to identify on all maps the “Natural Open Zones” within Chino Hills SP and as they relate to Alternative 4 routes. We further request that the management goal be listed and included in the evaluation process. As identified in the Chino Hills General SP Plan (p. 51, 54 & 55):
Comment Set A.13, continued: Department of Parks and Recreation, Inland Empire District

The primary goal of the Natural Open Space Zone is to preserve and protect the resources and at the same time to provide quality recreational opportunities.

11. The DEIR/EIS does not adequately identify and evaluate additional supporting infrastructure associated with the switching stations in Alternative 4 (section 2-73-2-86). The DER/EIS only mentions “telecommunications infrastructure” is needed with no further description, analysis or evaluation within the report. As we understand, the switching stations will require some form of reliable communication lines as a requirement. This could include fiber optic overhead lines on wooden poles, undergrounding in communication ducts or by microwave paths. State Parks requests the final EIR/EIS include further information, analysis and complete evaluation of this topic and address the potential impacts related to Chino Hills SP.

Additionally, the DEIR/EIS does not discuss or evaluate anywhere whether the switching stations will need external power brought to their locations in Alternative 4. As we understand, the switching stations will require two independent power sources and is usually delivered by a separate 12kV power line and an on-site emergency generator. This would include stringing 12kV power lines overhead possibly on wooden poles to the switching station. State Parks requests the final EIR/EIS include further information, analysis and a complete evaluation of this topic and address several additional impacts as they relate to Chino Hills SP. Some of which would be aesthetics, resources and additional wild fire ignition danger.

12. Overall, State Parks further requests that the final EIR/EIS provide a detailed analysis of the exact placement of all power line structures, access and spur roads, temporary construction sites and lay down areas for Alternative 4A-D routes within and around Chino Hills SP. The information provided so far is incomplete and State Parks cannot completely evaluate at this time.

E. Biological Resources

1. In Figures 2.4-1 and 2.4-3 the maps show “all-weather” access roads within the interior of Chino Hills SP. “All weather roads” are not consistent with maintaining Chino Hills SP open space management objectives and policies. New roads will fragment an already heavily fragmented area which is critical to the Regional Wildlife Corridor. Any new roads, “all-weather” or otherwise, will add cumulative impacts to healthy ecosystems. Chino Hills SP is virtually devoid of any paved roads. The only exception is near the lower campground area. We request alternatives be developed to exclude paved roads.

2. We request that a study be conducted on the effect(s) Alternatives 4 A-D have on the relatively natural Soquel Canyon watershed north of Chino Hills SP. The Soquel Canyon watershed contributes to the viability of the Puente-Chino Hills Wildlife Movement Corridor. Also, additional power lines and maintenance roads have the potential to cause significant impacts.
3. We request a change to Table 3.4-6 “Special Status Plants with the Potential to occur in the Project Area.” The Table makes a reference to the following plants having “potential to occur” within Chino Hills SP. However, we have survey records that have recorded them within the Park: Coulter’s matilija poppy, *Romneya coulteri*, Intermediate mariposa lily, *Calochortus weeldii* var. *intermedius*, and Plummer’s mariposa lily, *Calochortus plumeriae*.

4. We request modifying Table 3.4-7 Special Status Animals with the Potential to Occur in the TRTP area:
   a. Coast Range Newt, *Taricha torosa torosa* – add Soquel Creek within Chino Hills SP as “possible suitable habitat”
   d. Two Stripped Garter Snake, *Thamnophis hammondii* - add Soquel Creek within Chino Hills SP as “possible suitable habitat”
   e. Coastal Cactus Wren, *Campylorhynchus brunneicapillus*, a California Species of Special Concern – has been known to occur near the Rolling M Ranch and in Aliso Canyon within Chino Hills SP. It is not mentioned in the table or anywhere else in the document and needs to be considered. Chino Hills SP contains some of the last known pairs of Coastal Cactus Wrens in the Puente/Chino Hills.

5. We request a study with further analysis to address golden eagles, *Aquila chrysaetos*, a fully protected species known within Chino Hills SP and just outside of the Park to the northwest of Upper Aliso Canyon. Alternative 4D will impact the historic nesting territory to the northwest of Upper Aliso Canyon. Even if it is not in use now, progeny of the original pair may return and attempt to use this site or other sites in or adjacent to Chino Hills SP for nesting or foraging. Golden eagles are highly susceptible to disturbance. In order for golden eagles to continue to use a territory, at least a half-mile buffer should be used in attempt to reduce disturbance not just the nest site for successful reproduction behavior to occur during the nesting season. The document’s conclusion and summary of impacts to sensitive species should include this information and use it in the final determination. Additionally, any new infrastructure within the Park will impact the eagles foraging habitat adding to cumulative impacts on the few eagles that remain in the region. Progeny from the known pair will also continue to try to use that historic site even if one or both of the pair is deceased.
Comment Set A.13, continued: Department of Parks and Recreation, Inland Empire District

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The observation of an adult eagle recently made (March 11, 2009) above the Park Entrance station and northern Aliso Canyon supports the theory that they are still active in this identified nesting territory.

6. Overall, the DEIR/EIS does not sufficiently identify biological resources found along the Alternative 4 routes within the park. We request additional wildlife and plant survey’s be conducted and listed in the final EIR/EIS.

F. Cultural Resources

1. SCE’s archaeological survey did not include proposed access roads, despite identifying four previously recorded sites that will be directly impacted by the project. Three of these sites are located within Chino Hills SP. According to park records, CA-SBr-5283 is described as a prehistoric artifact scatter. CA-SBr-5097 is an extensive, multi-component resource processing and habitation site located on the bank of Aliso Creek. The prehistoric component of the site is one of only a handful of this type of site in all of the Chino Hills; SBr-3690, the only other site of this type within the park, is located directly beneath the proposed transmission line.

2. CA-SBr-6021, identified by SCE as being located within the park, has apparently been misidentified. According to the San Bernardino County Archaeological Information Center, site SBr-6021 is located in Yermo, California. The site in Telegraph Canyon they are likely referring to is SBr-12278 a prehistoric camp site consisting of a small hearth and artifact scatter. The extent to which this resource will be impacted by the proposed project is not provided in the DEIR/EIS. If the proposed access roads are to follow Telegraph and Bane Canyons, additional resources within these canyons will potentially be impacted, including CA-Ora-1650, a prehistoric use area, “the homestead,” a newly-recorded historic site, and numerous historic ranching and oil extraction features.

3. The historic component of SBr-5097 is the central feature of the park’s historic zone, the Rolling M Ranch. The DEIR/EIS does not adequately address direct impacts to this unique resource; the route of the access road is not given. Nor does it address indirect impacts to cultural resources as a result of the change in viewshed from the Rolling M Ranch. Any of the four routes proposed in Alternative 4 will be visible from the park’s historic zone and will compromise the integrity of the historic ranching landscape.

G. Geology, Soils

We agree with the DEIR/EIS assessment that lands within Chino Hills SP are highly susceptible to landslides. Since the park has been established, there have been numerous incidents of landslides, subsidence and “calving” of the unstable hillsides. Alternative 4 would introduce the potential to result in Geology, Soils, and Paleontology impacts in these areas which would not be affected by the Proposed Project. The major factors considered are soil instability, the need for
Comment Set A.13, continued: Department of Parks and Recreation, Inland Empire District

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access/spur roads in Chino Hills SP, the switching station, and earthquake-induced landslides.

H. Circulation

Implementation of Mitigation Measure T-6 (Ensure pedestrian and bicycle circulation and safety) would render impacts of the proposed Project to less than cumulatively considerable by requiring establishment of alternative pedestrian and bicycle routes around the proposed Project construction zone for safe passage as well as temporary detours for trail users (Class III). We request a Circulation Plan that would include, but not be limited to, potential detour routes, ground disturbance measurement, and impact assessment.

I. Visual Resources

As a Responsible Agency, we request additional Key Observation Points (KOP) to comprehensively analyze visual impacts on the visitor experience. Existing Conditions and Visual Simulations from KOP-South-23 (Near the intersection of Telegraph Canyon Trail and Raptor Ridge Trail) and 24 (Horse Camp) provide a valuable starting point. Additional KOPs, such as North Ridge Trail, South Ridge Trail, Rolling M Ranch, and Bane Canyon, may provide beneficial perspectives. We welcome the opportunity to participate in site selection.

J. Wildfire Prevention and Suppression

We agree with the assessment in Section 3.16 of Wildfire Prevention and Suppression. Installation and maintenance of any power line in or around Chino Hills SP will increase the chances of starting a wildfire which has the potential to approach and/or destroy residential communities and other urban uses, directly impact natural resources, park facilities, and recreation.

K. Mitigation Section 5.3.4

1. We concur with the Lead Agency’s determination that the 21st Century Green Partnership Proposal is not part of any of the alternatives analyzed in the DEIR/EIS nor was is it considered mitigation for impacts identified in the DEIR/EIS. One unknown is the uncertainty that such a mitigation funding proposal could occur. As stated, funding for this mitigation strategy would come from an increase in user rates. Already, the TRTP will be funded by an increase in user rates.

2. Section 3.4.8.1 Direct and Indirect Effects Analysis, discusses implementing a variety of mitigation measures including Measure B-1a, provide restoration/compensation for impacts to native vegetation communities and B-3a, prepare and implement a Weed Control Plan. This mitigation should be funded as part of the project.
Comment Set A.13, continued: Department of Parks and Recreation, Inland Empire District

3. We request analysis of the correlation between Alternative 4 routes and the Shell/Metropolitan HCP or the NCCP covering Chino Hills SP as shown on page 3.4-269, in the section titled - Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Communities Conservation Plan (NCCP), or other approved local, regional, or state HCP (Criterion BIO7).

4. In section 3.4.8.2 Cumulative Effects Analysis on page 3.4-269 – the final line states "However, given that a substantial portion occurs in areas that have not been disturbed or developed, this alternative's (Alt. 4) contribution to cumulative impacts would be greater than that of the proposed project." However, in the same section page 3.4-270 Cumulative Impact Analysis the final sentence states, "The minor re-route of the proposed Project transmission line associated with Alternative 4 would not differ from the proposed Project's contribution to cumulative impacts and therefore, cumulative impacts of Alternative 4 would be exactly the same a cumulative impacts for the proposed Project." Please clarify what appear to be conflicting statements.

Thank you again for the opportunity to comment. We remain committed to working with you to develop mutually acceptable solutions. For further discussion, please contact me at (951) 443-2423.

Sincerely,

Ron Krueper
District Superintendent

cc: Rick Rayburn, California State Parks
    John Rowe, California State Parks
    Judi Tamasi, WCCA
    The Resources Agency
    State Clearinghouse
Response to Comment Set A.13: Department of Parks and Recreation, Inland Empire District

A.13-1 Thank you for your comment and the description of the State Park’s mission. Your comments will be shared with the federal decision makers who are reviewing the Project.

A.13-2 Thank you for your comment.

A.13-3 Thank you for your comments. The roles of the Department of Parks and Recreation and the Park and Recreation Commission as Responsible Agencies are described in Section 1.3 of the Draft EIR/EIS.

A.13-4 The Draft EIR/EIS provides adequate information to characterize the Project’s impacts, identify appropriate mitigation measures to reduce impacts to the extent feasible, and reach conclusions as required per NEPA. Please see specific responses below for Land Use, Cultural Resources, and Visual Resources.

A.13-5 Thank you for your comment. It is noted that the Department of Parks and Recreation concurs with the CPUC’s determination that Alternative 2 is the CEQA Environmentally Superior Alternative relative only to those portions involving Chino Hills SP. Your comment will be forwarded to the federal decision-makers who are reviewing the Project.

A.13-6 Thank you for expressing your concerns and opinions. Your comments will be shared with the federal decision-makers who are reviewing the Project. The CPUC was responsible for providing you with a copy of the Final EIR.

A.13-7 This comment expresses concern regarding CEQA that are not relevant to the EIS. However, the CPUC prepared a response to this comment in the Final EIR that is reproduced below.

“The EIR/EIS has described a reasonable range of potentially feasible alternatives pursuant to State CEQA Guidelines § 15126.6(a). Please see Chapter 2 of the EIR/EIS for a description of alternatives, Chapter 3 for a discussion of impacts from the alternatives, and Chapter 4 for a discussion on the comparison of alternatives. In addition, please see the Alternatives Screening Report in Appendix A.”

A.13-8 This comment expresses concern regarding the CPUC that the Forest Service cannot address. However, the CPUC prepared a response to this comment in the Final EIR that is reproduced below with updates.

“The Lead Agencies are aware of and have reviewed Order 0.82-09-093. This order applies to the Mira Loma-Serrano transmission line and it has yet to be determined whether this order is also applicable to the proposed TRTP. Therefore, a final determination on the legal infeasibility of Alternative 4 was made by the CPUC and Alternative 4 is appropriately analyzed in the Draft EIR/EIS as a potentially feasible alternative.”

A.13-9 Please see the response to Comment A.13-8.

A.13-10 Comment noted. The land use impact analysis for Alternative 4 (Draft EIR/EIS Section 3.9.8.1) concludes that conflicts with the Chino Hills State Park General Plan would be significant and unavoidable.

A.13-11 Single-circuit transmission lines for Segment 8A are not under consideration at this time.
Thank you for your comments. Alternative 4 was not approved by the CPUC. However, text has been added to the description of the construction schedule for Alternative 4 in the Final EIR Chapter 2 to indicate that the schedule for each of these alternative routes would potentially be delayed as a result of the need to obtain approval from the California State Park Commission to amend the Chino Hills State Park General Plan (Alternative 4, Route A through D) and/or be delayed as a result of Department of Toxic Substance Control (DTSC) approval and access restrictions to the Aerojet property (Alternative 4, Routes C and D).

This is consistent with the description of agency approvals provided in Section 1.3 of the Draft EIR/EIS. The land use analysis concludes that the routing options under Alternative 4 would conflict with the Chino Hills State Park General Plan and that such conflicts would result in an unavoidable adverse impact. Additionally, Draft EIR/EIS Section ES.2 (Areas of Controversy, Issues Raised, and Issues to be Resolved) acknowledges that the California Department of Parks and Recreation has indicated that any transmission improvements within Chino Hills State Park would be inconsistent with the Park’s General Plan and, therefore, would not be permitted absent amendments to the General Plan.

Comment noted. The Chino Hills State Park General Plan (General Plan) addresses the potential for future land acquisitions for the purposes of long range planning, and past land acquisitions have emphasized the inclusion of ridgelines, watersheds, and buffer areas. However, the General Plan also states that “additional guidelines are needed to help [the California Department of Parks and Recreation] staff evaluate the desirability of proposed land acquisitions at Chino Hills State Park,” and no specific areas targeted for land acquisition could be found within the document. However, it is assumed that the area being referenced in Comment A.13-14 relates to the lands surrounding (north and west of) the Upper Aliso Canyon Core Habitat Zone (located southwest of the Park’s north entrance). Alternatives 4C, 4C Modified and 4D traverse these lands. The land use analysis for Alternatives 4C, 4C Modified and 4D (Section 3.9.8.1) has been revised to note the California Department of Parks and Recreation’s possible interest in acquiring at least a portion of these lands; however, due to the lack of any known and property-specific acquisition plans, no conclusions regarding impact significance can be made. Additionally, NEPA requires that the EIS shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration (40 CFR 1502.15). NEPA has no direct guidance regarding the establishment of a baseline for determining the significance of an impact when preparing an EIS. However, in a 2005 CEQ memorandum regarding emergency actions and NEPA it was pointed out that “You may contrast the impacts of the proposed action and alternatives with the current condition and expected future condition in the absence of the project. This constitutes consideration of a no-action alternative as well as demonstrating the need for the project.” Therefore, the Forest Service has taken a conservative approach and adopted the CEQA NOP date as the existing environment baseline. The resource-specific impact analyses of the Draft EIR/EIS address the Alternative 4 routes, including cumulative impacts.

Comment noted. The commenter is directed to Table 3.9-23, located at the end of the land use analysis. The table contains the full language requested for insertion in Comment A.13-15, and the text of Impact Criterion LU2 (Conflict with any applicable federal, State or local land use plans, goals or policies) for Alternative 4 directs the reader to Table 3.9-23.
A.13-16 The Aesthetic Resources Goal and all five Guidelines are listed in Appendix C of the Visual Resources Specialist Report of the Draft EIR/EIS, and all of these guidelines were considered in the analysis of the proposed Project and alternatives. As a result of this comment, minor modifications were made to the description of Impact V-7 in the Final EIR, but did not result in a change in the impact analysis or conclusions. These modifications were considered by the CPUC in its Decision on the Project. A more detailed response to this comment is provided in the Final EIR (reproduced below), but is not discussed further in this Final EIS.

For improved specificity, the Final EIR text for Alternative 4, Impact V-7, was changed by the CPUC. It now reads: Alternative 4 would conflict with the Management Plan of Chino Hills State Park, including Parkwide Management Goals and Guidelines for Aesthetic Resources.

A.13-17 An underground alternative within Segment 8A has already been analyzed as part of the Draft EIR/EIS (see Alternative 5, Partial Underground Alternative). Analysis of alternatives is appropriate when they avoid or substantially lessen any of the significant effects associated with the proposed Project. It is not necessary to investigate alternatives that address the adverse effects of other alternatives. As described in General Response GR-1, a reasonable range of alternatives has been analyzed in the Draft EIR/EIS.

A.13-18 The Final EIR included a new figure to portray the proximity of proposed Alternative 4 alignments in relation to the Chino Hills State Park (CHSP) management zones, including the Core Habitat Zones and Natural Open Zones, as specified in the CHSP General Plan. Discussion of these CHSP management zones has also been incorporated into Chapter 3 of the Final EIR/EIS, as appropriate. Inclusion of this information did not result in identification of any new significant impacts and no recirculation of the EIR was required. Thank you for your input.

A.13-19 Please see the response to Comment A.13-18.

A.13-20 Reliable communications lines are a requirement for the proposed switching station. While the specific design details are not described in the Draft EIR/EIS, these are standard features associated with these types of facilities and, as such, were assumed as part of the alternative in this analysis. The description of Alternative 4 in the Final EIR was updated to clearly identify the need for communications lines to the new switching station.

Adequate information was provided in the Draft EIR/EIS to accurately characterize impacts, identify appropriate mitigation measures to reduce impacts to the extent feasible, and reach significance conclusions. The additional detail being requested would have been developed as part of the final engineering for Alternative 4, if this alternative had been approved by the CPUC, but would not change the results of this analysis.

A.13-21 The proposed switching station will need AC power to operate pumps, fans, compressors, lights, battery chargers, and other equipment. As noted, at least two independent sources of power are required for a 500-kV switching station and are usually delivered at 12 kV and there would be an additional on-site emergency generator. While the specific design details regarding power/power sources for the new switching station were not described in the Draft EIR/EIS, these are standard features associated with these types of facilities, and as such,
Adequate information was provided in the Draft EIR/EIS to accurately characterize impacts, identify appropriate mitigation measures, and reach significance conclusions. The additional detail being requested would be developed as part of the final engineering for Alternative 4, if this alternative had been approved by the CPUC, but would not change the results of this analysis.

Please see the response to Comment A.18-6.

Per SCE, a paved all-weather access road to the proposed switching station is required for each of the Alternative 4 routes. As shown in Figures 2.4-1 though 2.4-4 of the Draft EIR/EIS, only Alternative 4A would require an all-weather access road through CHSP. If the proposed route through the Aerojet property were utilized under Alternative 4C, then the need for an all-weather access road through CHSP could be avoided. The options for access roads to the proposed switching station will be considered by the decision-makers at the CPUC and Forest Service as part of their decision on Alternative 4.

It is noted that under any of the Alternative 4 routing options, construction of an all-weather road either through the Park (Alternative 4A) or its surrounding areas (Alternatives 4B through 4C) could conflict with a Guideline related to the Chino Hills State Park General Plan Goal for Natural Resources, Biocorridors; the Guideline states: “The Department will actively work with local jurisdictions, transportation agencies, and regulatory agencies in the planning of future transportation projects. The Department will discourage the fragmentation and isolation of habitat by such projects and ensure that adequate mitigation measures are incorporated into all road improvement and construction projects. The Department will advocate measures that consider known information on wildlife use of biocorridors, principles of conservation biology, and other professionally accepted design criteria. An emphasis should be placed on the maintenance of habitat linkages and construction of under-crossings and bridges that allow full wildlife movement between the affected areas.” Additionally, Alternative 4A could conflict with the following Guideline for the General Plan’s Goal related to Development: “Road maintenance standards will be developed and implemented in cooperation with utility companies. These standards will be designed to maintain natural drainage patterns, reduce erosion and stream siltation, and minimize road widths and impacts to aquatic habitats.” The all-weather road proposed under Alternative 4A would also conflict with the Chino Hills State Park General Plan Goals contained in Tables 3.9-21 (Consistency with Applicable Land Use Plans and Policies – Alternative 4) and 3.9-23(Applicable Policies, Goals and Objectives). The land use analysis for Alternative 4 has been revised to reflect the above.

Thank you for your comment. Adequate information was provided in the Draft EIR/EIS regarding the effects to biological resources that occur within the Chino Hills State Park.
However, in response to your comment, additional specificity regarding biological resources was incorporated into the Final EIR prepared by the CPUC.

A.13-25 Thank you for your comment. Table 3.4-6 of the Final EIR was updated by the CPUC with the information you have provided. The analysis and mitigation provided under Impact B-23 (The Project could result in the loss of candidate, Forest Service Sensitive, or special-status plant species) adequately address impacts to these and other special-status species.

A.13-26 Thank you for your comment. Table 3.4-7 of the Final EIR was updated by the CPUC with the information you have provided. However, it should be noted that the CDFG recognizes only a subspecies of coastal cactus wren (*Camphlorhynchus brunnecapillus sandiegensis*) as a Species of Special Concern, and that status applies only to the subspecies in San Diego and Orange Counties.

A.13-27 Thank you for the information regarding this species. Table 3.4-7 of the Draft EIR/EIS does indicate the species is considered present in the Chino Hills State Park. While not specifically discussed, effects to this species are addressed under Impact B-5. Construction activities conducted during the breeding season would result in the loss of nesting birds or raptors. To provide further clarification for this species and ensure adequate buffers are included, the text of Mitigation Measure B-5 in the Final EIR was revised to include a 660-foot no activity buffer consistent with USFWS Guidelines for Bald Eagle Management (2007).

A.13-28 Thank you for your comment. Focused surveys for rare plants and wildlife were conducted along each of the Alternative 4 routes within the Chino Hills State Park to support preparation of the Draft EIR/EIS. Additional information regarding surveys conducted for Alternative 4 has been included in the Final EIR.

A.13-29 Comment noted. Field survey of the proposed all-weather access road would have been completed if this alternative had been approved by the CPUC. Of the sites referenced in the comment, CA-SBR-5283 would not have been affected, while CA-SBR-5097/H and CA-SBR-3690 may have been affected by existing access roads (see Table 3.5-9 of the Final EIR).

A.13-30 Thank you for pointing out that CA-SBR-6021 was misidentified. The resource number should read P36-060021. This has been corrected in Table 3.5.3 of the Final EIS. Because the resource is an isolated artifact and is not considered a significant property, CA-SBR-6021 (P36-060021) has been removed from Table 3.5.9 of the Final EIS.

P36-060021 is not CA-SBR-12278, as suggested by State Parks. CA-SBR-12278 is located along the proposed access road in Telegraph Canyon and will likely be impacted if that access road is selected. This site has been added to Table 3.5.3 and Table 3.5.9 of the Final EIS. Applied EarthWorks did not survey the proposed all-weather access roads and this site has not been field checked. Additionally, Applied Earthworks did not include the proposed all-weather access roads in their records search because they were not identified as part of the Project at the time. Thus, it is not known if additional sites (such as CA-ORA-1650) would be impacted by the proposed access roads.

A.13-31 Thank you for providing previously unavailable information on the proposed Rolling M Ranch Historic District. State Parks has recently identified this district, which is located primarily in the northeastern section of Chino Hills State Park around the ranch headquarters.
complex, and extending south and east along the drainage of Aliso Creek between Upper Aliso Canyon and the junction of Aliso and Bane Canyons. In August 2008, State Parks submitted a request to the California State Historic Preservation Officer to place the Rolling M Ranch Historic District on the California Register of Historical Resources; that request is pending review by the State Historic Resources Commission (Carver personal communication 2009).

Significant elements of the proposed historic district would have been impacted if Alternative 4 had been approved by the CPUC. The proposed all-weather access route along Bane Canyon and Telegraph Canyon could affect CA-SBR-5097/H or other resources that contribute to the significance of the district, depending on the nature, extent, and location of upgrades needed to improve the road. However, these details are not presently available. Field survey of the proposed all-weather access road has not been completed, but will be done if this alternative is selected.

Viewshed impacts were examined in Section 3.14 of the Draft EIR/EIS (Visual Resources). Significant historical viewsheds from the ranch headquarters itself are not likely to be adversely affected because the amount of landscape visible from the headquarters itself is quite limited. The headquarters complex is located in the lowland zone along Aliso Creek and the landscape beyond the first adjacent ridgeline is not visible. (For that reason, the headquarters was not selected as a Key Observation Point [KOP] for visual resource impacts). Figure 3.14-60a shows existing conditions from KOP-South-24, located at the equestrian center on a hilltop at the southern end of Bane Canyon Road. In this view, part of the headquarters area can be seen in the mid-ground lowland terrain, with the existing transmission line along the ridge in the background.

As illustrated by Figures 3.14-60b, 3.14-60c, and 3.14-60d, however, when viewed from a greater distance, the broader visual landscape of which the headquarters is part will be adversely impacted if Alternative 4 is selected. As described in Section 3.14.8.1 of the DEIR/S (Visual Resources, Alternative 4: Chino Hills Route Alternatives, Direct and Indirect Effects Analysis), the presence of new transmission line structures, conductors, switching station, access and spur roads, all-weather road to the switching station, and new rights-of-way in landscapes that currently have no transmission line facilities would result in significant visual impacts. Application of mitigation measures would reduce the impacts somewhat, but they would remain significant and unavoidable (Class I).

A.13-32 Thank you for your comment. The information regarding slope stability in the Chino Hills State Park area in regard to Alternative 4 is consistent with information presented in Section 3.7 of the Draft and Final EIR/EIS. Your comments will be shared with federal decision-makers who are reviewing the Project.

A.13-33 Mitigation Measure T-6 has been revised in the Final EIS to clarify that a circulation plan identifying detour routes for pedestrians and bicyclists would be included in the traffic control plans (TCPs) required under Mitigation Measure T-1. All detours and signage used to ensure safe passage for pedestrians and bicyclists shall be consistent with the standard guidelines outlined in the US Department of Transportation Manual on Uniform Traffic Control Devices (MUTCD). Copies of the TCPs shall be sent to the planning/or traffic departments of the affected local jurisdictions at least 30 days prior to the start of construction. Therefore, per
your request, the California Department of Parks and Recreation would have an opportunity to review a circulation plans that identify detour routes for pedestrians and bicyclists.

A.13-34 Appropriate locations and an adequate number of KOPs were analyzed to allow the characterization of impacts, the determination of impact significance, and the need for mitigation. NEPA does not require an EIS to analyze KOPs for individual properties or for each jurisdiction adjacent to or traversed by the proposed Project.

A.13-35 Thank you for your comment. Although, the proposed Project would increase the possibility of wildfire ignition, compliance with mitigation measures identified in Section 3.16 of the Draft EIR/EIS would reduce potential significant impacts to a less-than-significant level.

A.13-36 Thank you for your comment. Please see the response to Comment A.23-15 and General Response GR-9.

A.13-37 Thank you for your comment. The Forest Service and USACE only have authority to require implementation of feasible mitigation measures within each agency’s jurisdiction. The CPUC is responsible for ensuring implementation of mitigation measures on non-federal lands and would require SCE to provide funding as needed to implement mitigation measures.

A.13-38 Thank you for your comment. The HCP and NCCP described by the commenter address management guidelines specific to those entities who prepared the documents. The Draft EIR/EIS has adequately analyzed potential effects of the proposed Project in compliance with NEPA.

A.13-39 Thank you for your comment. The quoted sentence from page 3.4-270 appears on page 3.4-296 in the hard copy version of the Draft EIR/EIS. This sentence and the following ones read: “The minor re-route of the proposed Project transmission line associated with Alternative 4 would not differ significantly from the proposed Project’s contribution to cumulative impacts. However, as a greater portion of the Project would be located in undeveloped areas under Alternative 4, this alternative’s contribution to cumulative biological impacts would be marginally greater than the proposed Project. This difference would not be substantial, and the significance of cumulative impacts under Alternative 4 would be the same as the significance of cumulative impacts for the proposed Project.” This means that, although Alternative 4 would have marginally greater cumulative impacts to biological resources owing to the greater disturbance to undeveloped areas, this difference was not considered substantial enough by the CPUC to warrant a different significance conclusion (i.e. Class I, II, or III) from those determined for the proposed Project. Most cumulative impacts to biological resources were determined to be significant and unavoidable for both the proposed Project and Alternative 4.
Comment Set A.14: California Department of Fish and Game

California Natural Resources Agency  
DEPARTMENT OF FISH AND GAME  
South Coast Region  
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April 6, 2009

Mr. John Buccio/Mr. Justin Seastrand  
CPUC/USDA Forest Service  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301  
Fax #: (818) 597-6001


Dear Mr. John Buccio/Mr. Justin Seastrand:

The Department of Fish and Game (Department) has reviewed the Draft Joint Environmental Impact Report (DEIR)/Environmental Impact Statement (DEIS) relative to impacts to biological resources. The DEIR/DEIS considers Southern California Edison Company’s (SCE) application to build and operate the proposed Tehachapi Renewable Transmission Project (TRTP). The TRTP would involve new and upgraded transmission infrastructure along approximately 173 miles of new and existing rights-of-way (ROW) in southern Kern County, portions of Los Angeles County, including the Angeles National Forest (ANF), and the southwestern portion of San Bernardino County, California. SCE’s stated objectives for the proposed Project are to provide the electrical facilities necessary to integrate levels of new wind generation in excess of 700 MW and up to approximately 4,500 MW in the Tehachapi Wind Resource Area (TWRA). The proposed project will impact approximately 1,536 acres of vegetation communities of which 277 acres will be permanently impacted as a result of construction activities and access road construction.

The following statements and comments have been prepared pursuant to the Department’s authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under the California Environmental Quality Act (CEQA), Section 15381 over those aspects of the proposed project that come under the purview of Fish and Game Code Section 1600 et seq. regarding impacts to streams and lakes.

The California Wildlife Action Plan, a recent Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the California Public Utilities Commission and Southern California Edison (SCE) to minimize impacts to fish and wildlife resources with a focus on these stressors.

Conserving California’s Wildlife Since 1870
Comment Set A.14, continued: California Department of Fish and Game

The Department has the following specific concerns and recommendations with regard to the DEIR/DEIS:

1. Project Alternatives: Alternative 4A-D describes transmission routes that traverse Chino Hills State Park which would be an incompitable use of State Park lands. The biological and visual impacts cannot be easily mitigated with proposed Mitigation Measure B-1.

2. Preservation of off-site habitat for Mohave ground squirrel (MGS): The Department concurs with Mitigation B-22c, outlining options to preserve off-site habitat for MGS. Department Staff will work with SCE staff to identify appropriate occupied MGS habitat, as needed, during project implementation. The Department also recommends the same approach for desert tortoise habitat.

3. Table 3.4-17, Pg. 3.4-110: The permanent impact mitigation ratios do not conform to the associated off-site mitigation acreages in several instances. The Department concurs with the off-site mitigation acreage totals with the following exceptions: riparian mitigation ratios may be subject to greater ratios as determined in Department issued streambed alteration agreement/s for the project; impacts to ruderal grasslands warrant no less than a 0.5:1 mitigation ratio due to their value for foraging raptors.

4. Mitigation Measures for Impact B-1, Pg. 3.4-119: The DEIR states that mitigation for restoration/compensation for native vegetative communities on non-federal lands will be consistent with applicable local jurisdiction requirements. Such local jurisdiction requirements often only require the conservation of individual trees of specific species, and do not require the preservation, creation and/or the restoration of native vegetative communities. This often results in the planting of trees such as oaks or Joshua trees within landscaped artificial environments resulting in incremental losses to the associated biological diversity of these communities. Mitigation standards for vegetative communities should not necessarily adopt local jurisdictional requirements without assertions of specific measures to ensure success on the habitat community level. Acquisition and protection of habitat of equal or greater biological function should be required to adequately mitigate for unavoidable project related losses of native vegetative communities.

5. Impact B-7, 3.4-147: The DEIR describes direct impacts to threatened or endangered or proposed candidate plant species or their habitat. The direct impact discussion should include a discussion on whether fuel modification or other ongoing vegetative management will take place along the transmission routes, and impact acreages from these activities.

6. Impact B-10, Pg. 3.4-168: The DEIR describes capture and relocation of desert tortoise away from the project site work areas. Handling desert tortoise will require further consultation with and authorization by the Department and U.S. Fish and Wildlife Service under the state and federal Endangered Species Acts.

7. Mitigation Measure B-12, Pg. 3.4-172: The DEIR describes protection methods to be employed to avoid and lessen impacts to Santa Ana sucker and other aquatic organisms on USFS lands. The DEIR implies but does not make clear that a streambed alteration agreement may be required from the Department on alterations to drainages on USFS lands. Please clarify further.

8. Mitigation Measure B-18b, Pg. 3.4-185: The FEIR/FEIS should identify State incidental take permit requirements and measures which fully mitigate the impact to Swainson’s hawk. The DEIR/DEIS identifies the potential for nest tree removal and occupied nest abandonment. This may result in chick mortality, which would be considered take. The mitigation measure should identify the nest tree replacement...
Comment Set A.14, continued: California Department of Fish and Game

Mr. John Bucio/Mr. Justin Seastrand
April 6, 2009
Page 3 of 4

methods, success criteria, and monitoring plan to demonstrate that the mitigation would in fact mitigate the permanent loss of nesting sites, rather than deferring the development of these measures to Department consultation after project approval. The impact analysis and mitigation should consider the potential temporal effects which may occur as a result of reduced nesting opportunities between the time nest trees are removed and replacement nest trees attain a structure conducive to nesting.

9. Impact B-21, Pg. 3.4-188: The DEIR states that it is difficult to predict bird mortality without extensive information on bird species and movement within the proposed project area. Since the project does not propose extensive survey effort to gather the information needed to estimate bird mortality from collisions with overhead wires, the Department recommends a monitoring and adaptive management program for this project to attempt to reduce bird mortality. As an example, the Antelope Valley is an important wintering area for listed raptor species and other special status raptors. This area also experiences very high winds and already supports several large transmission lines. Construction of additional transmission lines creates a direct and cumulative gauntlet of increased mortality potential through this area.

10. Mitigation Measure B-7, Pg. 3.4-196: The DEIR states that preconstruction surveys will be conducted for state and federally threatened, endangered, proposed, petitioned and candidate plants. Surveys for 1B plants listed by the California Native Plant Society should also be included in the survey efforts since impacts to 1B plants are CEQA significant. All botanical surveys should follow the Departments Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Plant Communities.

11. Impact B-24, Pg. 3.4-199: The DEIR describes survey methods for detecting southwestern pond turtle. The Department recommends live trapping of suitable aquatic habitat as strictly visual surveys can miss detection of southwestern pond turtles, especially in areas of low populations. Live trapping may be conditioned within any streambed alteration agreement issued by the Department for this project.

12. Impact B-27, Pg. 3.4-206: The DEIR states that coordination with wildlife agencies shall be implemented to reduce impacts to reptile and amphibian species. The Department recommends that Department approval of the survey, relocation and mitigation measures be a condition of project approval.

13. Mitigation Measure B-29, Pg. 3.4-209: The DEIR states that the project will follow the Department’s protocol for burrowing owl. The Department concurs with the DEIR regarding habitat acquisition and protection as outlined in the burrowing owl survey protocol and mitigation guidelines. The Department recommends the permanent loss of non-native vegetative communities, as well as occupied native vegetative communities supporting burrowing owl should be mitigated for, because burrowing owls can and often do occupy non-native vegetative communities.

14. Impact B-36, Pg. 3.4-220: The DEIR states that preconstruction surveys for San Diego desert woodrat (woodrat) shall be conducted in Chino Hills and Puente Hills as this subspecies is known to inhabit these areas. The DEIR should describe the range and habitat preferences for the woodrat to justify focused surveys only in two areas out of the entire project footprint. Focused surveys should be conducted or presence assumed within this subspecies’ range and appropriate habitat.

The DEIR/DEIS thoroughly outlines the impacts and potential impacts to numerous plant and animal species. Many impacts associated with this project will be long-term. The Department proposes an annual mitigation assessment based on the miles of transmission line constructed for the estimated life of the transmission line. The annual assessment will be used to fund A.14-8, cont.

A.14-9

A.14-10

A.14-11

A.14-12

A.14-13

A.14-14

A.14-15
APPENDIX F. DRAFT EIR/EIS COMMENTS AND RESPONSES
Tehachapi Renewable Transmission Project

Comment Set A.14, continued: California Department of Fish and Game

Mr. John Buccio/Mr. Justin Seastrand
April 6, 2009
Page 4 of 4

projects within the general project environs for adaptive management and monitoring of impacts from the transmission line, habitat restoration, and conservation land acquisition. This proposal also includes developing a mitigation assessment fee for the 232,198 acre Tehachapi Wind Resource Area to help ensure future adaptive management and monitoring of impacts associated with wind energy generation.

Thank you for this opportunity to provide comment. Please contact Mr. Dan Blankenship, Staff Environmental Scientist, at (661) 259-3750 if you should have any questions and for further coordination on the proposed project.

Sincerely,

Edmund J. Pert
Regional Manager
South Coast Region

cc: Department of Fish and Game
Helen Birss, Los Alamitos
Dan Blankenship, Newhall
Scott Harris, Pasadena
David Hacker, Region 4
Scott Dawson, Region 6
Betty Courtney, Newhall
Chron file, San Diego
State Clearinghouse, Sacramento
Response to Comment Set A.14: California Department of Fish and Game

A.14-1 Thank you for your comment. The Draft EIR/EIS indicated that the alternative route through Chino Hills is not compatible with the Chino Hills State Park General Plan and that the placement of a line through this area would require an amendment to the General Plan. Mitigation for impacts to biological resources would not be limited to a single measure. Section 3.4.8, Alternative 4: Chino Hills Route Alternatives, provides a detailed description of the effects and provides numerous mitigation measures to reduce impacts to biological resources. In addition, Section 3.14.8, Alternative 4: Chino Hills Route Alternatives, provides a detailed discussion of impacts to visual resources and mitigation proposed to reduce those effects.

A.14-2 Thank you for your comment. Desert tortoise was recently identified in the project area. As a result, the preservation of tortoise habitat was included in the Final EIR prepared by the CPUC and is also reflected in the Final EIS. Mitigation Measure B-10 has been edited to include the following:

To mitigate potential permanent impacts to occupied desert tortoise habitat from Project construction, SCE will acquire habitat occupied by desert tortoises. Disturbance occurring along Segment 10 and along Segment 4 between the Cottonwind and Whirlwind substations shall be mitigated through acquisition of occupied habitat at a ratio of 3:1 (acres of habitat acquired:acres of land permanently disturbed). Mitigation acquisition shall occur at a FWS- and CDFG-approved location and shall be coordinated through a FWS- and CDFG-approved entity. SCE shall enter into a binding legal agreement regarding the preservation of off-site lands describing the terms of the acquisition, enhancement, and management of those lands. Fee title acquisition of habitat lands or a conservation easement over these lands will be transferred to an entity approved by FWS and CDFG, along with funding for enhancement of the land and an endowment for permanent management of the lands. SCE will provide verification to the CPUC that FWS- and CDFG-approved lands have been acquired.

A.14-3 Thank you for your comment. The Forest Service is aware that some of the permanent impact mitigation ratios do not conform to the off-site mitigation acreages reported in Table 3.4-17. This was a typographical error and has been corrected in the Final EIS. We also agree that higher mitigation ratios may be required for riparian vegetation through the context of the Streambed Alteration Agreement that will be obtained for the TRTP.

A.14-4 Thank you for your comment. The commenter is correct that Mitigation Measure B-1a (Provide restoration/compensation for impacts to native vegetation communities) states that all protection and replacement measures on non-NFS lands shall be consistent with applicable local jurisdiction requirements. This means that measures will not conflict with local requirements; however, it is not meant to imply that local requirements will be the only standard for mitigation. Instead, a Restoration and Revegetation Plan, to be approved by the CPUC and the USFWS on non-federal lands, shall be prepared that outlines the goals, standards, and implementation measures to be achieved by SCE subsequent to project construction. The measures contained within the Plan will likely exceed, but shall not conflict with, local requirements. In addition, compensation for permanent impacts is required under this mitigation measure. Compensation may be in the form of funding for land acquisition, preservation and/or restoration of off-site comparable areas, and mitigation banking. Because
Mitigation Measure B-1a already identifies the mitigation ratios and methods for compensation for temporary and permanent impacts, no changes have been made to the measure.

A.14-5 Operations and maintenance activities associated with the Project, which includes vegetation management, would be governed by both CPUC regulations, such as General Order No. 95, and per the terms specified in the Special Use authorization which would need to be issued by the Forest Service as part of Project approval. One of the standard terms for Forest Service transmission line permits is development of an Operations and Maintenance Plan. Operations and maintenance activities associated with the Project, as proposed by SCE, are detailed in Draft EIR/EIS Section 2.2.13. These activities routinely involve removal of vegetation per SCE Transmission Operations and Maintenance Policies and Procedures. While the Forest Service generally does not complete any further NEPA review for activities within the scope of an approved Operations and Maintenance Plan, all operations and maintenance activities are reviewed to ensure that impacts are avoided or minimized. Operations and maintenance activities would not cause any new disturbance on NFS lands, as all new transmission lines would be replacing existing ones. Furthermore, should any federally listed, proposed, or candidate species be found during the operation and maintenance activities and it is determined that operation and maintenance may affect that species, then further coordination or consultation with the USFWS will be required. Currently, there is no proposed or designated critical habitat for any federally listed plant species within the Project area. Should that change in the future, then re-initiation of consultation with the USFWS would be required.

A.14-6 Thank you for your comment. The commenter is correct in stating that handling of desert tortoises will require further consultation and coordination with the USFWS. It should also be noted that the Forest Service has completed consultation with the USFWS on the desert tortoise and 16 other federally listed or candidate species under Section 7 of the federal Endangered Species Act. The handling of desert tortoises will comply with the Biological Opinion issued by the USFWS in July 2010.

A.14-7 Thank you for your comment. As required by law SCE would be required to obtain a CDFG Lake and Streambed Alteration Agreement if they modify the bed and banks of any State Jurisdictional waterway. SCE is currently preparing a draft Streambed Alteration Agreement to submit to CDFG for review. In addition, the text of Mitigation Measure B-12 in the Final EIS has been modified to reflect CDFG’s comment regarding the requirement for a Streambed Alteration Agreement from CDFG. Furthermore, Impact B-2 of the Draft EIR/EIS contains the following text regarding the acquisition of regulatory permits. “A formal delineation of each riparian area would be conducted and SCE would apply for permits from the USACE, RWQCB, and CDFG for activities in riparian habitat. In addition, no activities would be allowed within any RCA without the concurrence of the Forest.”

A.14-8 Thank you for your comment. The text of the Final EIS has been modified to reflect CDFG’s comment regarding take.

A.14-9 Thank you for your comment. In order to evaluate potential impacts to birds from collisions with electrical transmission line components, numerous surveys of the Project area were completed. This included the preparation of an Avian Risk Assessment for the proposed...
Project, focused and reconnaissance surveys of the transmission line corridor, and protocol surveys for listed species in both riparian and upland areas. The Draft EIR/EIS recognizes and discloses that transmission lines and structures pose a risk to birds from collision and indicated areas where literature suggests collision risks are higher such as reservoirs, lakes, mountain passes, and known migratory movement corridors. In addition, the document indicates that the addition of new lines would result in significant and unavoidable cumulative impacts from collision. However, a monitoring and adaptive management program, even in the Antelope Valley portion of the Project, would require a substantial effort for the collection of scientifically meaningful data. The lead agencies concluded that, given the potential for impact to birds resulting from collision with the proposed transmission lines, it would not be feasible or proportional to the impacts related to collision to obtain useful, scientifically meaningful information regarding collision rates consider the labor intensiveness of data collection.

A.14-10 Thank you for your comment. Please see Section 3.4.6.1, Direct and Indirect Effects Analysis of the Draft EIR/EIS. Mitigation Measure B-23 (Preserve off-site habitat/management of existing populations of special-status plants) requires surveys for rare plants, including all CNPS List 1B plants that have the potential to occur in the Project area. These surveys will be conducted within 100 feet of all surface-disturbing activities during the appropriate floristic period for each species and will follow established and accepted protocol such as the Department’s Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Plant Communities.

A.14-11 Thank you for your comment. The Forest Service understands that the use of trapping provides a more thorough method to identify if this species occupies a Project area. However, most Project activities occur in adjacent upland habitat and would not result in substantial effects to riparian areas. This may be an appropriate mechanism for inclusion with the required Streambed Alteration Agreement.

A.14-12 Thank you for your comment. The CPUC has preemptive jurisdiction over the Project and is the Lead Agency under CEQA. The USDA Forest Service is the NEPA Lead Agency with exclusive jurisdiction over National Forest System Lands. Both agencies recognize the jurisdictional role of CDFG regarding wildlife of the State of California, and are firmly committed to involving CDFG in all aspects of project implementation, including specific aspects of mitigation measures. As demonstrated on recent SCE projects, CDFG will be consulted throughout field implementation of the mitigation measures. The Lead Agencies do, however, reserve their exclusive decision making authority regarding the selection of mitigation measures to be implemented, and any other conditions of approval.

A.14-13 Thank you for your comment. The text of the Mitigation Measure B-29 has been modified to reflect this change (please see Section 3.4.6.1, Direct and Indirect Effects Analysis of the Final EIS).

A.14-14 Thank you for your comment. This species is not considered sensitive on National Forest System lands and the federal Lead Agency has not required mitigation for this species.

A.14-15 Please refer to General Response GR-9 for a discussion of fee-based mitigation programs. Requiring a project applicant to pay an unspecified amount of money at an unspecified time to fund an unspecified plan is inadequate mitigation under NEPA. Mitigation, as defined by
NEPA, is intended to avoid, minimize, rectify, reduce, or compensate for the adverse effects of a project. In accordance with Supreme Court rulings (Nollan v. California Coastal Commission (1987) 483 U.S. 825), there must be an essential nexus between an impact and the measures proposed to mitigate the impact. Therefore, before mitigation can be formulated, an adverse impact requiring mitigation must be identified. After a specific adverse impact has been identified that would be caused by the proposed project, mitigation measures addressing that impact can be developed. There must be a direct nexus between the impact and the mitigation, and the mitigation requirements must be roughly proportional to the magnitude of the impact (Dolan v. City of Tigard (1994) 512 U.S. 374; Ehrlich v. City of Culver City (1996) 12 Cal.4th 854). The concept behind this is that a project should only be responsible for mitigating the impacts it generates and can only be required to mitigate its fair share of those impacts.
Comment Set A.15: County of Los Angeles, Chief Executive Office

County of Los Angeles
CHIEF EXECUTIVE OFFICE
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 674-1101
http://ceo.lacounty.gov

April 6, 2009

John Boccio
CPUC, EIR Project Manager
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Dear Mr. Boccio:

NOTICE OF AVAILABILITY OF
DRAFT ENVIRONMENTAL IMPACT REPORT/
ENVIRONMENTAL IMPACT STATEMENT
THE TEHACHAPI RENEWABLE TRANSMISSION PROJECT
(CALIFORNIA STATE CLEARINGHOUSE NO. 2007081156)

On February 12, 2009, your Commission and the US Department of Agriculture jointly released the Draft Environmental Impact Report (DEIR)/Environmental Impact Statement (EIS) for the Tehachapi Renewable Transmission Project ("Project") proposed by the Southern California Edison (SCE). The County of Los Angeles ("County") appreciates the opportunity to provide input. County staff reviewed the document and commented on issues within its jurisdiction; the comments are summarized in Attachment I and our analysis on the alternatives in the DEIR/EIS are listed below:

On Alternatives in the Draft EIR/EIS

- The County strongly supports Alternative 3: West Lancaster Area, which would traverse an undeveloped area and avoid impacts to existing single family residences in the west Lancaster area. (See Attachment II: Regional Planning (DRP)).

- The County strongly supports Alternative 6: Maximum Helicopter Construction in Angeles National Forest Alternative, which would utilize helicopter construction and eliminate the need for the construction of a new 14-mile roadway within the Angeles National Forest. However, the County does not support helicopter construction in close proximity to the residential neighborhoods such as Agua Dulce and the "cabins" along San Francisquito Canyon at the foot of the Angeles National Forest. (See Attachment II: DRP).

"To Enrich Lives Through Effective And Caring Service"

Please Conserve Paper – This Document and Copies are Two-Sided
The County strongly supports Alternative 7: 66-kV Alternative, which would provide re-routing and undergrounding of the existing 66-kV transmission line within the Whittier Narrows Recreation and Natural Areas and the vicinity of the former Duck Farm. (See Attachment II: DRP, Parks and Recreation, and Public Works).

The County recognizes the importance of having adequate infrastructure in place to support a vibrant economy. However, it is critical that the Project be sensitive to existing and planned uses and minimizes its impacts to the extent reasonable and possible. In addition, good coordination and partnership between SCE and the County is crucial to ensure the success of this project.

Should you have any questions, please contact Dorothea Park at (213) 974-4283 or via e-mail at dpark@ceo.lacounty.gov. If you need clarification regarding specific comments in the attachments, please contact the respective County department staff identified in the departmental letters.

Sincerely,

WILLIAM T FUJIoka
Chief Executive Officer

WTF:LS: DSP:JO:ib

Attachments (2)

c: Supervisor Gloria Molina, First District
   Supervisor Don Knabe, Fourth District
   Supervisor Michael D. Antonovich, Fifth District
   P. Michael Freeman, Fire Chief
   Russ Guiney, Director, Parks and Recreation
   Jonathan E. Fielding, M.D., M.P.H., Director and Health Officer, Public Health
   Gail Farber, Director, Public Works
   Jon Sanabria, Acting Director, Regional Planning
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

ATTACHMENT I
<table>
<thead>
<tr>
<th>Los Angeles County Department</th>
<th>Department Comments (See County Department letters in Attachment II for complete comments.)</th>
</tr>
</thead>
</table>
| Fire Department             | • The Draft EIR/EIS should address development within close proximity of the power lines and need to obtain appropriate clearances per Los Angeles County Fire Department Regulation #27.  
|                              | • The Draft EIR/EIS needs to update fire protection services information. |
| Parks and Recreation        | • Project construction and maintenance should avoid peak season and high visitation days that could impact County trails, parks, and recreational areas. Directional signs and public notices alerting the public need to be properly placed in the vicinity of project construction to ensure public awareness and safety. |
| Air Quality                 | • The Draft EIR/EIS does not contain sufficient information to allow the County to evaluate the Project’s impacts to the County’s park facilities including a planned community building near Pathfinder Park. The Draft EIR/EIS must clearly identify specific mitigation measures for each and every park facility impacted by the Project.  
|                              | • Based on County noise standards, the Draft EIR/EIS does not provide sufficient mitigation measures related to transmission towers adjacent to County recreational facilities. |
| Wilderness and Recreation   | • The Draft EIR/EIS should provide additional information and mitigation measures in the biological resource impact analysis as it relates to loss of wildlife, woodland and riparian habitats, and disturbance to nesting birds and sensitive plant species. |
| Biological Resources        | • The Draft EIR/EIS needs to address the Project’s visual impacts and provide effective mitigation measures, particularly in the Antelope Valley and in the Whittier Narrows Recreation and Natural Areas. |
**Comment Set A.15, continued: County of Los Angeles, Chief Executive Office**

<table>
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<tr>
<th>Los Angeles County Department Comments (See County Department letters in Attachment II for complete comments.)</th>
<th>Public Health</th>
<th>Hydrology/Water Quality</th>
<th>Traffic/Access</th>
<th>Geology and Soils</th>
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<tr>
<td>• The Draft EIR/EIS must implement all mitigation measures as stated in Section 3.10. Additional noise mitigation measures need to be formulated to ensure the Project’s compliance with the Los Angeles County Noise Ordinance. Maintenance of transmission lines and facilities should not occur on Sundays and legal holidays and between 7:00 p.m. and 7:00 a.m. during weekdays.</td>
<td>Francis Pierce (213) 430-5435 <a href="mailto:f.pierce@ph.lacounty.gov">f.pierce@ph.lacounty.gov</a></td>
<td>Lani Alonso (213) 430-7185 <a href="mailto:l.alonso@dpw.lacounty.gov">l.alonso@dpw.lacounty.gov</a></td>
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<tr>
<td>• The Draft EIR/EIS does not contain sufficient information to allow the County to evaluate the Project’s impacts to the County’s Flood Control District (FCD) facilities. Note that construction within the FCD easements and right-of-ways require permits from the County’s Department of Public Works (DPW).</td>
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<td>• The Draft EIR/EIS needs to specify that grading permits must be obtained from the Los Angeles County DPW for all grading activities related to access roads under the County’s jurisdiction.</td>
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<td>• The Draft EIR/EIS needs to specify that construction permits from the County must be obtained for any road closures and detours or activities within public right-of-ways addressing the proposed development and recommendation of mitigation measure for geotechnical hazards.</td>
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<td>• SCE should ensure that the substations and/or towers be kept a safe distance away from an active fault.</td>
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<td>• SCE should develop joint projects with DPW to minimize impacts to the San Gabriel River projects by undergrounding the transmission lines.</td>
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<td>• SCE should develop joint projects with DPW to minimize impacts to the San Gabriel River projects by undergrounding the transmission lines.</td>
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## Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

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<th>County Planning Department (See County Department letters in Attachment II for complete comments.)</th>
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<tbody>
<tr>
<td></td>
<td>Dept. supports Alternatives 3, 6 and 7 as described in the Draft EIR/ES.</td>
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<td>The Draft EIR/ES needs to include additional mitigation measures related to biological and visual impacts.</td>
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<td>The Department supports Alternative 7 which includes underground placement of transmission lines in the “Duck Farm” project area.</td>
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<td>DRP recommends strengthening Mitigation Measures L-1 and L-2 with regards to construction-related activities.</td>
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<td></td>
<td>The Draft EIR/ES needs to strengthen the discussions of geological and seismic hazards and provide adequate mitigation measures.</td>
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</table>

Paul McCarthy (472) 784-4627
pmccarthy@planning.lacounty.gov
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

ATTACHMENT II
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

COUNTY OF LOS ANGELES
FIRE DEPARTMENT
1328 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90033-3294
(323) 890-4339

P. MICHAEL FREEMAN
FIRE CHIEF
FORISTER & FIRE WARDEN

March 25, 2009

William T Fujioka, Chief Executive Officer
Chief Executive Office
713 Kenneth Hahn Hall of Administration
Los Angeles, CA 90012

Dear Mr. Fujioka:

NOTICE OF PREPARATION SOUTHERN CALIFORNIA EDISON'S TEHACHAPI RENEWABLE TRANSMISSION PROJECT, LACO (FFER #200900056)

The has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION: 3.11.2.1 Alternative 2: SCE’s Proposed Project

Public Services: Fire Protection — Angeles National Forest

1. Paragraph 2, sentences 2, 3 and 4, have been revised to update the LACoFD’s (Los Angeles County Fire Department’s) most recent statistical information as follows: “The LACoFD consists of more than 4,700 sworn and civilian personnel and is divided into three Regional Emergency Operations Bureaus, consisting of: North Operations Bureau, Central Operations Bureau, and the East Operations Bureau. The proposed Project is located within all three regions. The LACoFD operates 9 divisions, 21 battalions 170 Fire Stations, and 10 fire suppression camps in the 2,305-square mile service area, and answers over 250,000 emergency calls annually.”
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

William T Fujioka, Chief Executive Officer  
March 25, 2009  
Page 2

2. Table 3.11.2 – The table has been updated as follows:

**Los Angeles County Fire Department**

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<td>1-Collapse</td>
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<tr>
<td>Battalion 4, Station 19</td>
<td>La Canada</td>
<td>11</td>
<td>1-Engine</td>
<td>5 per shift/3 shifts</td>
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<td></td>
<td>Flintridge</td>
<td></td>
<td>1-Squad</td>
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<td>Battalion 4, Station 82</td>
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<td>11</td>
<td>2 Engines</td>
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<td></td>
<td></td>
<td></td>
<td>1-Patrol</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1-Utility</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1-Reserve Engine</td>
<td>Battalion Chief</td>
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<td></td>
<td></td>
<td></td>
<td>1-BC Vehicle</td>
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<td>1-Reserve Engine</td>
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<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>12 Total</td>
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APPENDIX F. DRAFT EIR/EIS COMMENTS AND RESPONSES  
Tehachapi Renewable Transmission Project

**Comment Set A.15, continued: County of Los Angeles, Chief Executive Office**

<table>
<thead>
<tr>
<th>Battalion, Station</th>
<th>Type</th>
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<td>Battalion 16, Station 44 Duarte</td>
<td>7</td>
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<td>Battalion 16, Station 32 Azusa</td>
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<td>1-Quint/Truck, 1-USAR Cache, 1-Utility, 1-Arson Unit, 1-Nurse Practitioner</td>
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*A.15-3, cont.*
## Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

William T Fujioka, Chief Executive Officer  
March 25, 2009  
Page 4

<table>
<thead>
<tr>
<th>Battalion</th>
<th>Station</th>
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<th>Engine Type</th>
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<td>Battalion 10, Station 167</td>
<td>El Monte</td>
<td>7</td>
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<td>El Monte</td>
<td>7</td>
<td>1-Engine</td>
<td>3 per</td>
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<td>Battalion 10, Station 169</td>
<td>El Monte</td>
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<td>Battalion 12, Station 87 Industry</td>
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<td>1-Engine 1-Deluge 1-Swift Water Unit 1-Helitender 1-Reserve Engine</td>
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<td>Battalion 12, Station 26 La Puente</td>
<td>7, 8A</td>
<td>1-Engine 1-Squad 1-Reserve Squad</td>
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Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

William T Fujioka, Chief Executive Officer
March 25, 2009
Page 5

<table>
<thead>
<tr>
<th>Battalion, Station</th>
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<tr>
<td>Batt 8, Stat 103 Pico Rivera</td>
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<td>1-Engine, 1-USAR Unit, 1-Rescue Tender, 1-Swift Water, 1-Heavy Rescue, 1-USR</td>
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<td>Batt 8, Stat 26 Whittier</td>
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<td>1-Engine, 1-Truck, 1-Squad, 1-Mobile Aid, 1-Utility, 1-Reserve Engine, 1-BC Vehicle, 1 Battalion Chief</td>
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<td>Batt 8, Stat 59 Whittier</td>
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<td>1-Engine, 1-Emergency Support Team, 1-Reserve Engine</td>
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<tr>
<td>Batt 8, Stat 96 Whittier</td>
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<td>1-Engine</td>
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<tr>
<td>Batt 12, Stat 91 Hacienda</td>
<td>7,8A</td>
<td>1-Engine, 1-Patrol</td>
<td>4 per shift/3 shifts, 12 Total</td>
</tr>
</tbody>
</table>

**LAND DEVELOPMENT UNIT:**

1. We have no comments at this time.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

William T Fujicka, Chief Executive Officer
March 25, 2009

Page 6

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. We have no comments at this time.

If you have any additional questions, please contact this office at (323) 690-4330.

Very truly yours,

FRANK VIDALAS, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

Fv.Jj
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
“Creating Community Through People, Parks and Programs”

Russ Guiney, Director

April 6, 2009

TO: William T Fujioka
Chief Executive Officer

FROM: Russ Guiney
Director

SUBJECT: NOTICE OF AVAILABILITY FOR A JOINT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT SOUTHERN CALIFORNIA EDISON TEHACHAPI RENEWABLE TRANSMISSION PROJECT

The document referenced above has been reviewed for potential impacts on County facilities operated by this Department. Comments on the Notice of Availability are attached.

If I can be of further assistance, please contact me at 213-738-2953 or your staff may contact Joan Rupert at 213-351-5126 or at jrupert@parks.lacounty.gov.

RG: JF/DF/ Edison-Tehachapi transmission project

Attachments

c: Phil Serpa, US Army Corps of Engineers
   Lani Alfonso, Public Works
   Mr. Bruce and Mrs. Billie Barsotti
   Parks and Recreation (N.E. Garcia and L. Hensley)
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

COMMENTS ON THE
NOTICE OF AVAILABILITY FOR A JOINT
ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT
SOUTHERN CALIFORNIA EDISON (SCE)
TEHACHAPI RENEWABLE TRANSMISSION PROJECT

3.3 Air Quality

Air quality impact AQ-3: “Construction of the Proposed Project would expose sensitive receptors to substantial pollutant concentrations.” This impact applies to all County park facilities and recreation areas. Mitigation measures should also include scheduling construction during off-peak times of park use, to avoid the effects of air pollutants on park patrons.

A.15-5

3.4 Biological Resources

Whittier Narrows Recreation Area

Most of the existing towers in the Recreation Area currently support active nesting by red-tailed hawks. Provisions must be made so that the new towers can accommodate such nesting.

A.15-6

Whittier Narrows Natural Area

- The tower footprints, especially through the Natural Area and Mitigation Lakes Area (Segment 6A), are in or immediately adjacent to confirmed Least Bell’s Vireo nesting sites. The Protocol Surveys and Preconstruction Surveys and measures taken to avoid nesting season impacts are critical and must be carried out in this area.

A.15-7

- The base of the tower along Segment 7, at Milepost 12, is exactly adjacent to the last known location of the rare Parish’s gooseberry (Ribes divisorium ssp. parishii), and a protocol survey should be done, at least there, for the plant (last seen in 1980, M. Long).

A.15-8

- To mitigate impacts to wildlife and riparian habitat, construction and maintenance of the new towers must be limited to the existing roads in the Southern California Edison (SCE) easement. Any new or widened roads in the Natural Area, even in the Right of Way (ROW), will impact riparian habitats.

A.15-9

- Coordination must occur with Department staff, if there is an increase to road and tower maintenance in the Natural Area.

A.15-10

- To avoid impacts to wildlife and vegetation, no staging areas should be located inside the Natural Area.

A.15-11
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

3.14 Visual Resources

Whittier Narrows Recreation Area and Whittier Narrows Natural Area

The project will substantially degrade the visual quality within the Recreation Area and Natural Area since there are numerous towers located within these facilities. The much taller transmission towers and the increased number of transmission lines are unavoidable visual impacts. However, the visual impact related to the towers themselves can and should be mitigated by including vegetative or other screening 10 to 12 feet in height at the base of the towers.

3.15 Wilderness and Recreation

Although the document is clear that the existing easements with the park facilities will not be increased, the document should identify the project’s access points, staging areas and specific location of the new transmission towers. Until such time, it is not feasible to adequately determine all the potential impacts to park facilities.

Additionally, to minimize the impact to the public’s use of County park facilities, advance notice of project construction is needed. This is necessary since some of the park facilities can be reserved a year in advance for major special events and regional and state tournaments. Reservations can be made for park facilities beginning January 1st each year, therefore, it is imperative that the construction schedule be transmitted to this Department no later than September 1st of the year preceding construction. Adequate time is also needed to allow for the temporary removal of items such as concrete picnic tables and many barbeque biair. Walkways may also need to be temporarily relocated. A four month notice is needed for the temporary removal/re-routing of these facilities. Mitigation measures should include that, once a tentative schedule is developed, it will be shared with this Department and that SCE will apprise the Department of any subsequent schedule revisions as they occur. Also, the duration of construction is expressed in hours but it needs to be identified in terms of days as well, so impacts can be further identified.

The Mitigation Measure for Impact R-1a should be revised to include: “SCE will locate the staging areas for project-related equipment, materials and vehicles, in areas to the satisfaction of the affected agency and with least possible effect on recreational activities and opportunities.”

Pathfinder Park

- Although all SCE towers are located just outside of the Park, crackling and hissing noise from the existing towers can currently be heard in the Park. The noise impact on the Park may be greater with the larger towers. Please specify appropriate noise minimization measures for insulator noise, such as new polymer insulators installed on the towers regardless of tower height.
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

- The County is considering the development of a community building at the Park just outside the SCE easement. Please specify the distance of the wires from the ground for the new transmission lines within the Park. Please provide the location and distance of the lowest line sag within the Park.

- No helicopter staging will be allowed on the ball fields.

- No wiring spools will be allowed to go through the park’s turf area north of the SCE easement.

- To minimize the impact to park use when restringing the lines crossing the Park, public access to the existing Community Center must be maintained.

**Whittier Narrows Recreation Area (WNRA)**

- The non-peak season for WNRA is from November to February which would provide the best time for the proposed project to take place in this park, which has an estimated attendance of more than 2 million visitors annually.

- For the towers closest to Legg Lake, the bridge between the Center Lake and North Lake will not be able to bear the use of trucks greater than one ton. We recommend that to access the towers at the west side of the bridge, enter from Rosemead Boulevard and to access the towers east of the bridge, enter from Santa Anita Avenue. Until the location of the new towers is identified, the placement of new towers may permanently restrict public access to this walkway between the two lakes. To avoid this impact, the location of the new towers should allow continued use of the existing walkway between the lakes.

- The Disc Golf Area is south of Lexington Gallatin Road, east of Santa Anita Avenue, and north of Durfee Avenue. Tower demolition and construction in this area may close the Disc Golf Area completely to the public. Again, the location of the new towers must be identified so impacts can be adequately analyzed.

- The Model Boat Area is southwest of Legg Lake, east of the agricultural fields known as the “Strawberry Patch”. The Model Boat patrons currently use the path between the lake and the Strawberry Patch to access the lake for the model boat activities. Further coordination is needed to minimize the impact on the parking access.

- The Archery Range is west of Rosemead Boulevard, east of Rio Hondo River Channel, between proposed transmission lines Segment 7 and Segment 8A. The towers of segment 7 are located within the demised premises of the concessionaire who is under contract with the County. The concessionaire is Mr. Bruce and Mrs. Billie Barsotti, 831 North Rosemead Boulevard, South El Monte, CA 91733. However, all coordination for the proposed project will continue to be handled by this Department.
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

- If the Sporting Dog Area is intended to be used as an access point to the SCE easement, further coordination is needed to minimize the impact to park patrons.

Santa Fe Dam Recreation Area

The project will impact the Model Plane Area and the Walking Path to the south of the Model Plane Area. The Model Plane Area is west of I-605 and south of Duarte Road, at the northwest corner of the Santa Fe Dam Recreation Area. The project will impact the Model Plane Area users and hikers, joggers and bikers during construction.

Alternative 7. 66-kv Subtransmission

The Department supports Alternative 7 which re-routes two lines outside of Whittier Narrows Natural Area. One of the lines is near the Nature Center and the other is within the Mitigation Lakes area close to habitat for the Least Bell’s Vireo. It is especially critical that the rerouting of this second line is done outside of the nesting season for this federally listed endangered species. The Department also supports this alternative to underground a segment of the transmission lines as they occur within the recreation resource known as the “Duck Farm”.

Trails

The following comments pertain to all County trails within the transmission line easement.

SCE will need to post public notices within the project vicinity two months in advance regarding trail closures/trail re-routes. Trail closure signs should read:

"TRAIL WILL TEMPORARILY BE CLOSED MONDAY-FRIDAY, DURING CONSTRUCTION FOR THE PUBLIC'S SAFETY, FROM 7 a.m. – 5 p.m. STARTING (Date and Year)"

To minimize recreation impacts to the public during construction, trails need to remain open Saturdays, Sundays and holidays. SCE should also provide, install and maintain regulatory information signs stating the following information: "CAUTION CONSTRUCTION AHEAD", "YIELD". During construction, a security fence needs to be installed to separate and protect trail users from construction areas and construction hazards. The document should also state that there will be no permanent alterations to the County's Multi-Use/Equestrian trails and that the impacted trails will remain open and unobstructed after construction.
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

March 25, 2009

Hsiao-Ching Chen, AICP
Unincorporated Area Services Liaison
Department of Regional Planning
320 West Temple Street, Room 1390
Los Angeles, CA 90012

Dear Ms. Chen,

This is in response to the Draft Environmental Impact Report/Statement (DEIR/DEIS) for the Tehachapi Renewable Transmission Project (TRTP) that was forwarded to this Department for review and comment. Environmental Health has reviewed the Noise Section 3.10 of the DEIR/DEIS and offers the following comments:

- The applicant shall follow through with all the Applicant-Proposed Measures (APMs) listed in section 3.10.4.2, Table 3.10.0 regarding construction noise.
- The applicant shall implement mitigation measures N-1a and N-1b listed on pages 3.10-22 through 3.10-23 in regards to implementing best management practices for construction noise and avoiding sensitive receptors during mobile construction equipment use.
- Routine maintenance of the Tehachapi Renewable Transmission Project should be prohibited on any Sunday or legal holidays, or at any other time between weekday hours of 7pm and 7am.
APPENDIX F. DRAFT EIR/EIS COMMENTS AND RESPONSES

Tehachapi Renewable Transmission Project

Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

- The applicant should strive to preserve the public health and environment by complying with all applicable noise and vibration standards/ordinances of the surrounding jurisdictions where sensitive receptors exist in proximity to the project. The applicant is responsible for adhering to such standards and ordinances during the construction and operational phases of the project.

- It is stated in the DEIR that corona noise generated by operation of the proposed project would result in permanent and substantial increases to existing ambient noise levels. It is also stated that the project will not be in compliance with the Los Angeles County Noise Ordinance, Title 12, Chapter 12.08. The applicant is hereby directed to take effective measures to bring this project into compliance with the Los Angeles County Noise Ordinance.

We appreciate the opportunity to be of service on this project and look forward to working with you in the future. If you have any questions, please contact myself or Francis J. Pierce at (626) 430-5436.

Sincerely,

Cole Landowski, MPH CIH
Head, Environmental Hygiene Program

C: Julia F. Orozco
   Mika Yamamoto
   Phil Doudna
   Alfonso Medina
   Aura Wong
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS  
"To Enrich Lives Through Effective and Caring Service"  
900 SOUTH FRIDAMENT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1351  
Telephone: (323) 474-1100  
http://www.lacounty.gov  

March 25 2009

Mr. John Boccio, CPUC, EIR Project Manager  
Mr. Justin Seastrand, USDA Forest Service, Special Uses Coordinator  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301

Dear Mr. Boccio and Mr. Seastrand:

DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
TEHACHAPI RENEWABLE TRANSMISSION PROJECT

As requested, we reviewed the Draft Environmental Impact Report (DEIR) for the subject project. The proposed project includes construction, operation, and maintenance of 173 miles of new and upgraded transmission infrastructure within new and existing right of ways. The transmission alignment extends southerly from Kern County through north and central Los Angeles County and easterly along the Puente/Chino Hills to San Bernardino County.

The following comments are for your consideration:

Hydrology/Water Quality

1. Alternative 2, the Southern California Edison (SCE) proposed project alternative includes two proposals for the double-circuit 66-kV transmission towers in Segment 7, either relocation of 45 existing towers to the edge of the SCE right of way between Mile Post 4.4 and 15.8 or undergrounding of the transmission lines of those same towers for the same 11.4 miles. Since this stretch of Segment 7 runs immediately parallel to the San Gabriel River from the City of Irwindale southerly through the Whittier Narrows Dam Recreation Area and because the relocation of the towers to the edge of the right of way could increase the area with restricted use around the SCE right of way, we recommend that the transmission lines be placed underground rather than the towers relocated. This would minimize impacts to proposed and ongoing San Gabriel River Corridor Master Plan projects in the area.
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

Mr. John Bocco
Mr. Justin Seastrand
March 25, 2009
Page 2

2. If project transmission lines are not placed underground, we recommend that SCE develop joint projects with Public Works to enhance adjacent SCE and Los Angeles County Flood Control District right of ways with water quality and/or passive recreation amenities in order to mitigate the aesthetic impact of the project on the San Gabriel River Bicycle Trail and the San Gabriel River Corridor Master Plan projects as well as the reduced useable area surrounding the larger and/or increased number of towers.

3. Substations and/or towers should be kept out of natural drainage pathways.

4. The proposed project may affect several Los Angeles County Flood Control District facilities. Some of the facilities include: Eaton Wash, San Gabriel River, and the Santa Fe Spreading Grounds. At this time, we cannot comment on the degree of impact this project would have until more specific information such as construction plans at a standard scale are available. SCE should obtain permits through Public Works’ Construction Division for any work within the Los Angeles County Flood Control District easements and/or right of ways.

5. Prior to construction, grading permits must be obtained for all access roads within the County of Los Angeles jurisdiction. Grading permits can be obtained through Public Works’ Building and Safety Division.

Traffic/Access

Any proposed public road closure and detour, towers and/or transmission lines within public road right of way, or any USFS permitted locations, will require a construction permit from Public Works’ Construction Division.

Geology/Soils

1. All or portion of the site is located within potentially liquefiable and earthquake-induced landslide areas per the State of California Seismic Hazard Zones Map—Del Sur, Sleepy Valley, Lancaster West, Ritter Ridge, Pacifico Mountain, Acton, Pasadena, Azusa, Mt. Wilson, El Monte, Baldwin Park, Whittier, La Habra, and Yorba Linda Quadrangles. Site-specific geotechnical reports addressing the proposed development and recommending mitigation measures for geotechnical hazards should be included as part of the EIR.
2. On page 4.7-29, a discussion is made of the impacts of fault rupture on the project. Under APMs GEO 1 and 2 the towers will undergo geotechnical and geological analysis, and will implement design and construction features that will reduce the impact due to fault rupture. However, the mitigation measure does not include ensuring that the towers are not built upon any active fault traces. SCE should ensure that the substations and/or towers be kept a safe distance away from an active fault.

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921.

Very truly yours,

GAIL FARBER
Director of Public Works

DENNIS HUNTER, PLS PE
Assistant Deputy Director
Land Development Division

cc: Chief Executive Office (Lari Sheehan)
    Regional Planning (Hsiao-Ching Chen, Paul McCarthy)
April 6, 2009

TO: William T Fujioka
Chief Executive Officer

FROM: Jon Sanabria, Acting Director
Department of Regional Planning

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT
SOUTHERN CALIFORNIA EDISON
TEHACHAPI RENEWABLE TRANSMISSION PROJECT

While the Department of Regional Planning (DRP) supports the development of renewable energy projects, the Department has reviewed the Draft Environmental Impact Report (EIR) prepared by Southern California Edison (SCE) regarding its proposed development of the Tehachapi Renewable Transmission Project with regard to its completeness in addressing the environmental impacts of the project on properties located within the unincorporated portions of Los Angeles County. The EIR has been prepared for review by the California Public Utilities Commission (CPUC) which is the Lead Agency.

The DRP has concluded that adoption of Alternative 3 will provide for a less environmentally impactful project than the development of Alternative 2 (the proposed project). Alternative 3 is also known as the West Lancaster Alternative. This alternative would reroute the proposed 500-kV Segment 4 transmission line from 110th Street West to 115th Street West. The Alternative 3 alignment would be located approximately one-half mile further west of the proposed Alternative 2 alignment. The Alternative 3 alignment would traverse an undeveloped area while the Alternative 2 alignment would traverse an area developed with single-family residences.

The DRP has concluded that adoption of Alternative 6 could provide for a less environmentally impactful project than the development of Alternative 2 (the proposed project) within the boundaries of the Angeles National Forest. However, care must be taken to avoid the use of helicopters in proximity to communities such as Agua Dulce and "the cabins" along San Francisquito Canyon.
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

TEHACHAPI RENEWABLE TRANSMISSION PROJECT EIR
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Alternative 6 is also supported by the United States Forest Service. It has the potential to reduce ground disturbance by eliminating the need to construct 14 miles of new roadway that would be necessary to accommodate conventional construction methods. Alternative 6 would utilize helicopter construction within the Angeles National Forest "to the maximum extent feasible." The DRP believes that where conflicts with residential communities exist that the use of helicopters should be determined to be infeasible.

Ten temporary helicopter staging areas are proposed to be constructed under Alternative 6. The DRP urges SCE and the CPUC to consider the advisability of making the ten new helipads permanently available for use by the Los Angeles County Fire Department following completion of the project.

The DRP concurs with the Board of Supervisors in concluding that the adoption of Alternative 7 will provide for a less environmentally impactful project than the development of Alternative 2 (the proposed project) within the River Commons Project area, the site of the former Duck Farm adjacent to the 605 Freeway. Implementation of Alternative 7 will also provide for re-routing and undergrounding of the existing 66-kV subtransmission line around the Whittier Narrows Recreation area along the project’s Segments 7 and 8A and will protect the habitat of the Least Bell’s Vireo and reduce visual impacts.

Volume 2, Page 3.9-60 of the EIR discusses proposed Mitigation Measures which are designed to reduce construction-related impacts. Mitigation Measure L-1a will require that SCE provide the name and contact information for a public liaison to all property owners located within 300 feet of construction-related activities. The SCE liaison will be required to respond to citizen concerns within 72 hours. DRP also recommends that affected County Departments such as Sheriff, Public Works, Fire, Regional Planning and Board Offices be provided the contact information with regard to the SCE liaison. DRP further recommends that the Mitigation Measure be amended to ensure that responses will be forthcoming on weekends and in particular during 3-day holiday weekends, if included within the 72 hour period.

Volume 2, Page 3.9-61 of the EIR discusses Impact L-2. It notes that, "Construction-related activities would also temporarily restrict or preclude access to, and potentially the use of, lands adjacent to construction-related work areas." Page 3.9-65 of the document describes Mitigation Measure L-2. It states that "SCE shall ensure that all affected non-residential property owners within 300 feet of the ROW are always provided with at least one point of vehicular (passenger car and truck) and pedestrian access to their respective properties throughout all phases of construction." DRP recommends that Mitigation Measure L-2 be amended to provide the same protections to single and multi-family residences.
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office

The EIR addresses the potential geologic and seismic hazards that confront the proposed project. However, the document did not include within its analysis the results of the recent Great Southern California Shakeout drill conducted by the United States Geologic Survey. The drill was conducted in cooperation with numerous Southern California local governments, public utilities, emergency response agencies, hospitals and schools, including Los Angeles County. It was widely reported in the press that Southern California utility companies had concluded, as a result of the exercise, that their earthquake response contingency plans were seriously flawed. It was reported that said utility companies had not factored into their response plans the extensive damage to major roadways that is anticipated in the vicinity of the San Andreas Fault and the challenges those disruptions would present with regard to the deployment of men, equipment and replacement parts to damaged transmission facilities within proximity to the ruptured fault. The Final EIR should address the lessons which may have been learned by SCE as a result of the exercise.

In conclusion, the DRP supports Alternatives 3, 6 (with limitations discussed) and 7 as described in the EIR. The Department recommends strengthening of Mitigation Measures L-1a and L-2 with regard to construction-related activities. The Department is requesting additional evaluation and comments regarding seismic safety and is requesting an additional mitigation measure related to the use of helicopter staging areas following completion of the project.

Should you have any questions or concerns, please contact myself of Paul McCarthy of my staff at (213) 974-6461 or pmccarthy@planning.lacounty.gov.
Comment Set A.15, continued: County of Los Angeles, Chief Executive Office
Response to Comment Set A.15: County of Los Angeles, Chief Executive Office

A.15-1 Thank you for your comments. The Forest Service acknowledges the County’s support for Alternatives 3, 6, and 7; however, please be aware that the Forest Service and USACE only have jurisdiction related to Alternatives 2, 6, and 7 as those are the only alternatives that involve federal lands. It is also noted that the County does not support helicopter construction in close proximity to the residential neighborhoods such as Agua Dulce and the “cabins” along San Francisquito Canyon. However, for clarification, Agua Dulce and the “cabins” along San Francisquito Canyon are located many miles from the proposed Project.

A.15-2 Comment noted. The CPUC revised Final EIR Section 3.11.2.1 (Public Services and Utilities) to reflect Comment A.15-2. This section has not been included in the Final EIS as the changes did not change the analysis or conclusions of the Draft EIR/EIS.

A.15-3 Comment noted. The CPUC revised Table 3.11.2 (Potentially Affected Fire Protection Services) in the Final EIR in response to Comment A.15-3. This section has not been included in the Final EIS as the changes did not change the analysis or conclusions of the Draft EIR/EIS.

A.15-4 Thank you for this information.

A.15-5 Park patrons are not considered sensitive receptors because, unlike residents, park patrons would generally not be exposed to increased air emissions for long periods of time. For example, on bike paths a cyclist would go through the construction equipment downwind exhaust plume within a few seconds. Also, unlike more fixed locations such as schools, hospitals, or residences, exposures in recreational areas can often be avoided by moving to another area of the park. Therefore, the mitigation measures already in place to mitigate impacts to residents and other sensitive receptors are sufficient to reduce impacts to park patrons (Draft EIR/EIS, page 3.3-35). Please see the response to Comment A.17-6 for further discussion of this issue.

A.15-6 Thank you for your comment. The proposed towers have been designed to comply with APLIC guidelines to minimize electrocution potential for bird species.

A.15-7 Thank you for your comment. The requirements of Mitigation Measure B-15 (Conduct protocol or focused surveys for listed riparian birds and avoid occupied habitat) include protocol surveys for this species within the Project area and adjacent areas within 500 feet in all habitat capable of supporting the least Bell’s vireo. In habitat that is known to be occupied by this species, focused surveys will be conducted. No construction will occur within 300 feet of a confirmed nest or territory. These measures apply to all known and potential habitat for this species, including the Natural Area and Mitigation Lakes Area. It should be noted that Mitigation Measure B-15 has been edited to state that the construction-free buffer may be adjusted provided noise levels do not exceed 60 dB(A) hourly Leq at the edge of a nest site.

A.15-8 Thank you for your comment. Parish’s gooseberry is presumed extinct in California by the California Native Plant Society (CNPS). According to CNPS, recent surveys for this species have been negative. Nonetheless, SCE is required to conduct surveys for rare plants within the Project ROW and within 100 feet of all ground-disturbing activities (Mitigation Measure B-23: Preserve offsite habitat/management of existing populations of special-status plants). Should this species be detected during surveys, SCE would mark and avoid it to the extent
feasible. If not feasible, SCE would consult with the CPUC and USACE (if applicable) to determine appropriate action, including transplanting or reseeding.

A.15-9 Thank you for your comment. Construction activities associated with the proposed Project may impact riparian areas. However, SCE is required to restore and mitigate for all Project effects.

A.15-10 Thank you for your comment. The Forest Service encourages SCE to coordinate with affected local jurisdictions on construction and maintenance activities.

A.15-11 Thank you for your comment. Staging areas for each tower are required for construction of the Project. However, SCE would be required to mitigate losses to vegetation communities should they occur by implementing mitigation measures for Impact B-4, i.e., Mitigation Measures B-1a, B-1b, B-2, B-3a, AW-1a and H-1a. These measures would reduce impacts to vegetation communities to the extent feasible. Construction related impacts to wildlife would be reduced by replacing lost functional values and avoiding construction during the breeding season.

A.15-12 Draft EIR/EIS Section 3.14 (Visual Resources) concludes that the proposed Project would result in unavoidable adverse impacts. Specifically, the impact analysis at the end of the discussion of Impact V-3 (For a landscape with an existing transmission line, increased structure size and new materials would result in adverse visual effects) states: “While the mitigation measures described above would reduce the effects of Impact V-3 along portions of the Project route, visual impacts … from increased tower heights in the South Area, would remain adverse and unavoidable.” Including vegetative or other screening (walls, fences, or lattice) that are 10 to 12 feet tall at the base of new transmission line structures would not effectively screen structures that would be approximately 113 to 262 feet tall in this area and, therefore, this suggestion has not been incorporated as a new mitigation measure. Additionally, CPUC General Order 95 specifies vegetation management practices and clearances between energized conductors and surrounding vegetation. Section 2.2.13 of the Draft EIR/EIS (Operations and Maintenance) describes vegetation management around each tower footprint.

Thank you for expressing your concerns regarding the visual impacts of the Project. Your comments will be shared with the federal decision-makers and considered in rendering a decision on the Project.

A.15-13 Information regarding construction access points, staging areas, and individual transmission tower locations are preliminary at this time and subject to change. This information will be developed in more detail and finalizes as part of SCE’s final engineering process, which would occur after Project approval. Adequate detail regarding construction activities is included in the Draft EIR/EIS to characterize the impacts, make impact conclusions, and determine the need for mitigation. As described in the Draft EIR/EIS, construction activities would occur within existing roadways and utility easements to the maximum extent feasible. Analysis of impacts to recreational resources and opportunities, including park facilities within Los Angeles County, was provided in Section 3.15 (Wilderness and Recreation) of the Draft EIR/EIS. This impact analysis takes into consideration potential impacts that could occur as a result of construction-related access restrictions (Impact R-1), and mitigation measures are presented to reduce construction impacts to the extent feasible.
A.15-14 Analysis of the Project’s Wilderness and Recreation impacts, including as related to Los Angeles County park facilities, is provided in Section 3.15 of the Draft EIR/EIS. This analysis also identified mitigation measures where applicable to reduce impacts. Mitigation Measure R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas) is required for recreation resources that would be affected by Impact R-1 (Construction activities would restrict access to or disrupt activities within established recreational areas) and Impact R-2 (Operation and maintenance activities would restrict access to or disrupt activities within established recreational areas). This mitigation measure would include advance noticing of Project construction activities, as well as identification of construction duration and coordination with all affected agencies responsible for management of recreational areas, including within Los Angeles County.

A.15-15 The location of staging areas for Project equipment, materials, and vehicles will be identified during SCE’s Final Engineering process; this information is not currently available. However, the mitigation measure noted by the commenter (MM R-1a: Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas) requires the Project Proponent (SCE) to coordinate with agencies responsible for the management of recreational areas that would be affected by Project activities. Through implementation of this mitigation measure, as required by Section 3.15 (Wilderness and Recreation) of the Draft EIR/EIS, Final Engineering details including the identification of staging areas shall be developed to result in the least possible effect on recreational activities and opportunities.

A.15-16 Noise-related concerns that are relevant to recreation, including the potential for Project-related noise to affect recreational experiences, are addressed in Section 3.15 (Wilderness and Recreation) of the Draft EIR/EIS.

Pathfinder Community Regional Park is located in the community of Rowland Heights, along Segment 8 of the proposed Project (Alternative 2). As stated on Draft EIR/EIS page 3.10-32, operational noise impacts of the proposed Project within Segment 8 would substantially increase existing ambient noise conditions. Conductor and insulator specifications used to determine Project operational noise levels within Segment 8 were provided on Draft EIR/EIS pages 2-23 and 2-24. No feasible mitigation measures are available to reduce or eliminate the permanent operational corona noise that would be generated by the proposed Project. (Draft EIR/EIS 3.10-32 through 3.10-34.)

A.15-17 Thank you for communicating the County of Los Angeles’ consideration of the development of a community building at Pathfinder Park. Table 3.15-17 (South Region Recreational Resources within One-Half Mile of Alternative 2), as presented in Section 3.15 (Wilderness and Recreation) of the EIR/EIS, describes that the proposed Project would traverse the northern portion of Pathfinder Park along Segment 8A, at approximately Mile 13.7. The exact distance between the proposed transmission lines and the ground surface at this location would be determined during the final engineering process. SCE has standards in place to ensure minimum distances between the active transmission lines and the ground. During final engineering, factors such as topography and surrounding infrastructure will be considered to determine the tower height and spacing necessary to maintain consistency of the Project with SCE’s standards for minimum distance between transmission lines and the ground.
With respect to how a new community building within Pathfinder Park would be compatible with Project infrastructure, it is noted that if the new building is placed under the new transmission lines, it would also be within SCE’s utility corridor, and thus would be considered a shared use of the corridor. Any shared uses of the SCE utility corridor would be subject to existing easement restrictions. Please note that any use or development of transmission ROWs will need to be implemented in a manner that is consistent the ROW’s primary purpose as a transmission corridor, which places necessary restrictions on any joint-use projects.

A.15-18 Section 2.2.12.2 (Staging and Support Areas) describe helicopter staging areas that would be required during construction of the Project; as described, no helicopter staging areas have been identified along Segment 8A of the proposed Project, including in the vicinity of Pathfinder Park. Construction activities would be coordinated with all agencies responsible for managing recreation areas affected by the Project, including the County of Los Angeles, as required by Mitigation Measure R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas). Thank you for your comments and suggestions regarding Project impacts on County of Los Angeles Department of Parks and Recreation’s recreational facilities, including Pathfinder Park; they will be shared with and considered by decision makers.

A.15-19 Thank you for your comment and suggestion regarding construction scheduling in the vicinity of the Whittier Narrows Recreation Area. Construction of the proposed Project would be scheduled to occur during periods of lower recreational use. Mitigation Measure R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas) stipulates that construction activities would be coordinated with all agencies responsible for managing recreation areas affected by the Project. It also specifies: “... that through coordination efforts...and at the discretion of the authorized officer(s) responsible for management of the affected resource(s), SCE shall ensure the following occurs unless otherwise approved by the affected agencies: Construction and maintenance activities are scheduled to avoid heavy recreational use periods (including major holidays); Staging areas for Project-related equipment, materials, and vehicles are located in areas with least possible effect on recreational activities and opportunities; and Timetables for the required period of usage of each staging area are developed and adhered to in coordination with all affected resource agencies...” (Draft EIR/EIS, page 3.15-81.)

A.15-20 Thank you for your input regarding facilities within the Whittier Narrows Recreation Area.

A.15-21 As previously noted the location of individual transmission towers will be identified during SCE’s Final Engineering process. The Draft EIR/EIS analysis was performed based on preliminary engineering, including tower locations, provided by SCE. For the most up to date information on proposed tower locations, the Forest Service recommends that the County contact SCE directly. Construction activities, including staging areas to be used for tower demolition, would be coordinated with affected agencies responsible for managing recreation areas affected by the Project, including the County of Los Angeles, as required by Mitigation Measure R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas). Mitigation Measure R-1a would also require staging areas for project-related equipment to be located in areas with the least possible effect on recreational activities and opportunities (Draft EIR/EIS, page 3.15-81). In addition, operation
and maintenance of the project would not have a significant impact on access to activities within recreational areas (Draft EIR/EIS, pages 3.15-83 through 3.15-86). Thank you for your input regarding the Disc Golf Area; your comments will be shared with and considered by decision makers.

A.15-22 Thank you for your input regarding the Model Boat Area/Strawberry Patch access to Legg Lake. As described, coordination of construction activities is required by Mitigation Measure R-1a, which includes a requirement that staging areas for project-related equipment be located in areas with the least possible effect on recreational activities and opportunities (Draft EIR/EIS, page 3.15-81).

A.15-23 Thank you for your input regarding the Archery Range. Coordination of construction activities will be conducted according to Mitigation Measure R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas).

A.15-24 Coordination of construction activities in the area surrounding the SCE utility corridor that may affect the Sporting Dog Area would be conducted in accordance with Mitigation Measure R-1a. Such coordination would minimize impacts to recreational activities and opportunities in that area.

A.15-25 Construction and operation and maintenance of the proposed Project could impact the Santa Fe Dam Recreational Area in places where the transmission line directly crosses the Recreational Area. These potential impacts are discussed in Section 3.15 of the Draft EIR/EIS on pages 3.15-76 through 3.15-86. Several mitigation measures are identified that would reduce the impact to the Santa Fe Recreational Area. (Draft EIR/EIS pages 3.15-80 through 3-15.82.)

A.15-26 Thank you for your comment. Your support of Alternative 7 is noted. Construction activities associated with this alternative would be conducted outside of the breeding season for the least Bell’s vireo to the extent feasible. If construction must occur during the breeding season, a qualified biologist would conduct pre-construction protocol surveys in suitable habitat or focused surveys in habitat known to be occupied by this species. If vireos are detected, a 300-foot buffer would be established within which no construction activities would occur during the breeding season (Mitigation Measure B-15: Conduct protocol or focused surveys for listed riparian birds and avoid occupied habitat, Draft EIR/EIS, page 3.4-180.)

A.15-27 Implementation of the proposed Project does not include plans to permanently close or obstruct existing recreational trails, including the County of Los Angeles’s multi-use and equestrian trails. The analysis presented in Section 3.15 (Wilderness and Recreation) of the Draft EIR/EIS includes mitigation measures to minimize the Project’s impacts to recreational trails. In accordance with Mitigation Measure R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas) SCE will coordinate with the Los Angeles County Department of Parks and Recreation in the scheduling of construction activities and posting of public notices to minimize Project impacts to the recreational resources. Implementation of Mitigation Measures R-1b (Identify and provide noticing of alternative recreation areas) and R-1c (Notification of temporary closure of OHV routes) would also minimize Project impacts to recreational and multi-use trails, including those managed by the County of Los Angeles.
The commenter’s request to keep trails open on weekends and holidays has been noted and will be shared with decision makers. However, due to public safety concerns associated with construction equipments and activities located in proximity to recreation activities, construction of the proposed Project may require that some trails be temporarily restricted on weekends, and possibly on holidays. As described in Mitigation Measure R-1a, SCE will coordinate with managing recreation officer(s) to schedule construction activities to avoid heavy recreational use periods, including major holidays, to the maximum extent feasible. Any trail restrictions or closures that occur during Project construction would be temporary in nature, and would be sign-posted at least 30 days prior to the onset of construction activities, in accordance with the mitigation measures identified above and described in Section 3.15 of the Draft EIR/EIS. Thirty days prior notice of temporary trail closures is adequate to mitigate impacts; providing notice two months in advance of temporary trail closures would not further reduce Project impacts on recreational trails.

It should also be noted that any shared uses of the SCE utility corridor, including for recreational trail use, would be subject to existing easement restrictions; any use or development of transmission ROWs will need to be implemented in a manner that is consistent the ROW’s primary purpose as a transmission corridor, which places necessary restrictions on any joint-use projects.

A.15-28 Certification of the Final EIR and selection of the preferred project by the CPUC has bound SCE to all APMs and Mitigation Measures required for that alternative. APMs are considered a part of the proposed alternative and have been incorporated as such. The Final EIR mitigation monitoring plan contains details on how all mitigation measures would be monitored including all proof of completion requirements.

A.15-29 Section 3.10.6.1 of the Final EIR has been revised to specify that routine maintenance activities would not occur on weekday between the hours of 7 p.m. and 7 a.m. or on Sunday or legal holidays. On federal lands considered in the Final EIS, no specific restriction on maintenance activities is applied as mitigation; however, the Forest Service will consider ways to reduce impacts on Forest visitors through its ongoing administration of SCE’s permits.

A.15-30 Applicant-Proposed Measure (APM) NOI-1 indicates that SCE will comply with all applicable noise ordinances regarding construction hour limitations or obtain variances where necessary. (Draft EIR/EIS, page 3.10-20.) APM NOI-2 requires the applicant to minimize substation noise by conducting noise studies to determine appropriate design measures to ensure compliance with applicable noise ordinance limitations. (Draft EIR/EIS, page 3.10-20.) In addition, Mitigation Measure MM-N-1a requires the applicant to implement a variety of noise suppression techniques, which are listed on pages 3.10-22 through 3.10-23 of the Draft EIR/EIS, to ensure compliance with applicable noise standards and ordinances to the extent possible. (Draft EIR/EIS, page 3.10-22.) Adoption of mitigation measures in the Final EIR as conditions of approval has bound SCE to all APMs and Mitigation Measures required for that alternative. APMs are considered a part of the proposed alternative and would be incorporated as such. The Final EIR mitigation monitoring plan contains details on how all mitigation measures would be monitored including all proof of completion requirements. Implementation of the APMs and noise mitigation measures would ensure compliance with most applicable noise ordinances. However, noise levels during construction would violate
several noise ordinances for sensitive receptors. Please see Table 3.10-9 and the discussion of Impact N-2 in Draft EIR/EIS Section 3.10.6.1 for an analysis of the proposed Project’s compliance with each applicable noise ordinance. Because mitigation measures would not prevent all noise ordinances from being violated, noise impacts would be adverse and unavoidable.

A.15-31 Draft EIR/EIS Chapter 2 (Description of Alternatives) and Draft EIR/EIS Table 3.10-5 identify the parameters considered during corona noise modeling, which includes conductor size and other engineering specifications to minimize corona noise to the maximum extent feasible. In addition, all feasible mitigation measures to reduce noise levels would be implemented, as described in Draft EIR/EIS section 3.10.6. All project alternatives described in Draft EIR/EIS Chapter 2 and evaluated in Section 3.10 would result in adverse unavoidable operational noise impacts. Please note that on federal lands considered in the Final EIS, no mitigation for corona noise is recommended. The Los Angeles County Noise Ordinance would not apply on federal lands.

A.15-32 Please see the responses to Comments A.17-10 and A.8-1. Please note that the letter from the County of Los Angeles, Department of Public Works was submitted separately and is identified above as Comment Set A.8. Please see Comment Set A.8 for responses to those comments.

A.15-33 Please see the response to Comment A.8-2.
A.15-34 Please see the response to Comment A.8-3.
A.15-35 Please see the response to Comment A.8-4.
A.15-36 Please see the response to Comment A.8-5.
A.15-37 Please see the response to Comment A.8-6.
A.15-38 Please see the response to Comment A.8-7.
A.15-39 Please see the response to Comment A.8-8.
A.15-40 Thank you for your review and comment. Your recommendation was shared with decision-makers at the CPUC and will be shared with federal decision-makers.
A.15-41 Thank you for your comment. The Forest Service acknowledges LA County’s concerns over the use of helicopters near residential areas. The Angeles National Forest will experience a majority of the helicopter use under Alternative 6. The Forest Service respectfully disagrees with the County’s assessment, and has determined that helicopter use on National Forest lands, which would impact nearby communities, is feasible. Impacts to communities adjacent to the National Forest are described in Section 3.10.2.6, Noise Impacts of Alternative 6, and will be considered by federal decision makers.

It should also be noted that the use of helicopters during construction would reduce the visual impacts on the Angeles National Forest because it would reduce the number of new access and spur roads that would otherwise be needed (See Draft EIR/EIS, Section 3.14). These considerations will need to be weighed by federal decision-makers.

Greater short-term disruption to residential areas presented by Alternative 6 was a factor in the Lead Agency’s selection of a preferred alternative that combines ground construction
favored by Alternative 2 and helicopter access maximized by Alternative 6 (See Section 4.3). While this preferred alternative was not specifically defined to avoid the residential areas within and near the ANF, adoption of the Agency Preferred Alternative would lessen the overall extent of helicopter use compared to Alternative 6, and reduce disruptions for residents.

A.15-42 The helicopter staging areas are generally located on National Forest System (NFS) lands within the Angeles National Forest. As part of the Project, these staging areas would be temporary and would be restored following completion of construction activities. As discussed in the Supplemental Draft EIS and incorporated into the Final EIS (see Section 2.2.13, Operations and Maintenance), SCE has requested that small helicopter landing areas (50 foot by 50 foot) at each of the identified helicopter staging areas not be restored after construction and remain as a permanent features of the Project to support operations and maintenance activities. The specific operation and maintenance needs for these areas will be included in the overall Operations and Maintenance Plan (to be approved by the Forest Service) for the transmission line easement. The only routine maintenance activity for these landing areas would be brush clearance. A request to make these permanently available for use by the Los Angeles County Fire Department is outside the scope of this EIS. The Forest Service has a separate process to permit/approve such uses and would be willing to coordinate further with LA County Fire in this regard. Please note that all wildfire impacts associated with the Project (with the exception of Alternative 4 within Chino Hills where there are no helicopter staging areas identified) have been mitigated to the extent feasible and analyzed in detail in Section 3.16.

A.15-43 Thank you for your comment regarding Alternative 7.

A.15-44 Comment noted. The Forest Service agrees that affected local agencies should be provided with the liaison contact information provided to local property owners for the proposed Project’s construction phase (Mitigation Measure L-1a [Construction liaison – Property owners]). However, since the purpose of Mitigation Measure L-1a is to provide property owners with a mechanism for efficiently resolving property-specific concerns by contacting SCE (or its contractor) directly, it is considered more appropriate to require SCE to provide local agencies with this contact information through Mitigation Measure L-4 (Consult with federal, State and local agencies). Mitigation Measure L-4 has been revised to reflect this requirement.

As addressed in Draft EIR/EIS Section 2.2.12.1 (Transmission Line Construction), construction-related activities would typically occur Monday through Friday during daylight hours (7:00 a.m. to 5:00 p.m.). However, as noted in Section 2.2.12.1 (APM NOI-1), when different hours or days are necessary, SCE has indicated that it would obtain variances, as needed, from the jurisdiction within which the work would take place. As such, the Lead Agencies acknowledge that construction-related activities could occur over weekends and holiday weekends that extend for more than 72 hours (three or more days). However, since the construction liaison must be available at all times that construction is active (including weekends and holiday weekends), it is highly unlikely that the construction liaison would not be available to respond to property owner comments or concerns during these weekend and holiday weekend periods. Therefore, revision to Mitigation Measure L-1a in response to Comment A.15-44 is not considered necessary; it is noted, though, that Mitigation Measure
A.15-45 Comment noted. Impacts for land use were developed to distinguish between residential (Impacts L-1 and L-3) and non-residential (Impacts L-2 and L-4) uses because their related activities and functions are distinct from each other, and thus the proposed Project’s effects on them are different. Although residential effects due to construction would include impacts such as the temporary curtailment of outdoor activities (such as gardening and play time) and short-term access restrictions within a neighborhood, the overall function of a residential home would not be substantially impaired. Mitigation Measures L-1a through L-1c have been recommended to provide residents with the time needed to prepare for (and respond to, if needed) temporary construction-related impacts. With implementation of these measures, in conjunction with Mitigation Measures T-1a (Prepare Traffic Control Plans), T-1b (Restrict lane closures), T-6 (Ensure pedestrian and bicycle circulation and safety) and T-11 (Provide continuous access to properties) impacts to residential land uses would be reduced to the extent feasible. In contrast, construction-related activities could substantially impair the entire function of a non-residential use due to impacts such as blocked and restricted access or the possible need to temporarily shut-down all or some operations (for those uses that occur directly within right-of-way, such as nurseries). Direct impairment to the function of these non-residential land uses could also result in indirect impacts, at both local and regional scales, such as disruptions in the ability to provide goods and services. Consequently, Mitigation Measure L-2a (Construction plan provisions – Non-residential property owners) has been recommended specifically for non-residential land uses to minimize the potential for construction to completely obstruct their respective functions. The Forest Service has no jurisdiction over private lands where single-family homes are located; therefore, the Forest Service would be practically unable to implement this mitigation.

A.15-46 Thank you for your comment. Regional emergency planning issues are not within the scope of analyses of a geology section of an EIS document.

Your concerns regarding flaws revealed in utility company emergency response plans by the Great California Shakeout have been forwarded to SCE, which would be responsible for updating their Event Response and Recovery Protocol manual to include the new transmission facilities. SCE’s Event Response and Recovery Protocol manual includes protocols to be implemented in response to catastrophic events including fault rupture to allow for quick implementation of operations to repair transmission structures in the event an earthquake does cause damage to structures.
Comment Set A.16: Acton Town Council

April 6, 2009

John Boccio/Justin Seastrand
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[Submitted electronically & via fax (17 pages)]


Reference: Southern California Edison’s Proposed Tehachapi Renewables Transmission Project.

Dear Messrs. Boccio and Seastrand:

The Acton Town Council respectfully submits the attached comments prepared in response to the Draft Environmental Impact Report/Environmental Impact Statement (“Draft EIR/EIS”) that was released February, 2009 pursuant to the Tehachapi Renewables Transmission Project (“TRTP”) proposed by Southern California Edison (“SCE”). The Acton Town Council notes that these comments have been timely filed in accordance with February 18, 2009 revised Notice of Availability issued jointly by the U.S. Forest Service (“USFS”) and the California Public Utilities Commission (“Commission”).

Sincerely

/s/ Jacqueline Ayer
Jacqueline Ayer
On behalf of the Acton Town Council
As the Commission and the USFS are aware, half of the eight segments that comprise SCE's proposed TRTP project are located within the community of Acton. The Acton Town Council is therefore keenly aware of the potentially significant impacts that this project will have on our community. We have reviewed the Draft EIR/EIS that was prepared pursuant to the proposed TRTP project, and identified several issues that are particularly troublesome. Of primary concern to the Acton Town Council is the fact that most of the infrastructure proposed by SCE for inclusion in the TRTP project is not actually necessary to meet the stated project objectives. Thus the underlying project purpose and need seems fundamentally unsupportable under both the California Environmental Quality Act (CEQA) and the National Environmental Protection Act (NEPA). These and other deficiencies noted by the Acton Town Council are described sequentially in the following pages.

1.0 THE DRAFT EIR/EIS DOES NOT PROPERLY ESTABLISH THE PROJECT NEED OR OBJECTIVES

According to Page 1-6 of the Draft EIR, the following objectives for the TRTP project were developed based on statements contained in the Proponent's Environmental Assessment (PEA) which SCE submitted to the Commission with the TRTP application:

1) Provide the electrical facilities necessary to reliably interconnect and integrate up to approximately 4,500 MW of new wind generation in the Tehachapi Wind Resource Area (TWRA) currently being planned or expected in the future,

2) Address the reliability needs of the CAISO-controlled grid due to projected load growth in the Antelope Valley; and

3) Address existing transmission constraints located South of the Lugo substation which have long been an ongoing source of concern for the Los Angeles Basin.

The Acton Town Council understands that the Lead Agencies hired a consultant to conduct an “independent analysis” of the project to ensure that these project objectives adequately represent the underlying Project Purpose and Need in accordance with CEQA and NEPA. Based on this “independent analysis”, the Lead Agencies determined “there is ample support to justify the need for the TRTP” (page ES-17 of the Draft EIR/EIS). The Acton Town Council further understands that this “independent analysis” is not (and will never be) publicly available, despite the fact that it constitutes the fundamental basis for justifying the TRTP project purpose and need. Apparently, the public is expected to accept (without question or proof) the consultant’s independent determination that the Project Objectives will not be met if the entire TRTP project as proposed SCE is not approved.

Out of idle curiosity, the Acton Town Council asked for (and received) a list of the documents that were relied upon by the consultant in their “independent analysis” of the TRTP project. These documents were identified as:
APPENDIX F. DRAFT EIR/EIS COMMENTS AND RESPONSES

Tehachapi Renewable Transmission Project

Comment Set A.16, continued: Acton Town Council

- CAISO’s South Regional Transmission Plan for 2006 (CSRTP 2006)
- CAISO’s January 18, 2007, Memorandum to the Board of Governors.
- CAISO’s Large Generator Interconnection Procedures (LGIP).
- CAISO’s Controlled Grid Generation Queue as of January 25, 2008 (Generation Queue)
- FERC’s March 20, 2007, Order Approving CAISO’s Request for Tariff Waiver
- FERC’s August 22, 2007, Order Granting Clarification on the Approved Tariff Waiver.

Because we were unable to review the consultant’s “independent analysis”, the Acton Town Council reviewed these documents separately to confirm whether they supported the Draft EIR/EIS’s conclusion that the TRTP project as proposed by SCE is both necessary and justified. Some of the documents (such as the two FERC’s documents, the CEC’s REP document, the CAISO LGIP and Generation Queue) provide no useful information in that they do not address the TRTP project in any detail, nor do they provide information substantiating the consultant’s conclusions. However, the CSRTP 2006 report, the CAISO Board of Governors Memorandum, and the CEC IEPR provide substantial data which bluntly contradicts the “independent analysis” results reported by the Lead Agencies’ consultant. These documents clearly demonstrate that the infrastructure proposed by SCE for inclusion in the TRTP project is NOT necessary to achieve the stated project objectives.

--The FERC Order dated March 20, 2007 pertains to the CAISO’s request for a one-time waiver of the Open Access Transmission Tariff (OATT). While this Order does refer to the CSRTP 2006 report and the CEC’s findings that the TRTP has the undeveloped capacity to provide up to 4500 MW of wind energy, it offers no additional data or studies beyond those to support the Draft EIR/EIS contention that the proposed TRTP is necessary to meet the stated project objectives.

--The FERC’s August 22, 2007 Order pertains to Calpine’s request for clarification regarding the FERC’s March 20, 2007 Order. It offers no data or studies which support the DEIR/DEIS contention that the proposed TRTP is necessary to meet the stated project objectives.

--CEC’s Renewable Energy Program 2007 Annual Report summarizes the activities and funding status of the California Renewable Energy Program covering the period of July 1, 2006 through June 30, 2007. It provides no information that is useful for justifying the purpose of SCE’s proposed TRTP project.

--CAISO’s Large Generator Interconnection Procedures (LGIP) is the CAISO protocol for >20 MW generation sources to interconnect to the CAISO controlled grid. It provides no information that is useful for justifying the purpose of SCE’s proposed TRTP project.

--The CAISO’s Controlled Grid Generation Queue merely identifies the power generation facilities that have requested to be interconnected to the California electrical grid in the future. It indicates only that substantial quantities of renewable generation that can be accessed by the TRTP.
The CAISO reports clarify that the project objectives can be met without most of the TRTP infrastructure. CAISO’s analysis of the TRTP provided in the CSRTTP 2006 and summarized in the Board of Governor’s Memorandum affirms that the project objectives enumerated in the Draft EIR/EIS will be met without most of the infrastructure proposed by SCE for inclusion in the TRTP project. Specifically, these documents refer to the following infrastructure into and out of Vincent as being necessary to accommodate 4,500 MW of power through Vincent in addition to the “South of Lugo” constraints:

- New 230 kV from Vincent to Mesa (Segment 11)
- New 500 kV from Vincent to Mira Loma (Segments 6, 7, and 8)
- New 230 kV line from Antelope to Pardoe (Now under construction as Segment 1 @ 500 kV)
- New 230 kV line from Vincent to Antelope (Segment 2)
- 230 kV Replacement of existing Vincent-Rio Hondo #2 line
- Additional 230 kV line from Vincent to Antelope (Segment 5)

A comparison of this infrastructure (which represents the elements which CAISO has deemed necessary to achieve the stated project objectives) with the infrastructure proposed by SCE for inclusion in the TRTP project reveals that most of the proposed TRTP segments are not necessary to meet the stated project objectives.

The IEPR clarifies that the proposed TRTP project is intended to accommodate 8,000 MW of energy: Pages 132-133 of the IEPR state quite clearly that the TRTP project will “capture much of the estimated economic potential for renewable energy development in that region”. It goes on to cite a California Energy Commission report that specifically identifies the renewable energy development in that region to be 8,000 MW. Thus it affirms that SCE’s proposed TRTP project is substantially over-designed, because the TRTP infrastructure is specifically capable of accommodating far more power than the 4,500 MW identified in the Draft EIR/EIS project objective statement. In other words, most of the infrastructure that SCE proposes to include in the proposed TRTP project is not needed to accommodate 4500 MW of TWRA wind energy and address the “South of Lugo” situation.

From these reports, the Acton Town Council concludes that most of the proposed TRTP project is simply NOT justified for the purposes of the project. Apparently (and surprisingly) SCE agrees with the Acton Town Council on this issue, since their 2007 “Conceptual Transmission Requirements And Costs For Integrating Renewable Resources Report” clearly specifies that much of the proposed TRTP infrastructure into and out of Vincent is not needed until the Tehachapi area exports MORE than 4,500 MW through Vincent. Even more surprising, SCE’s own testimony provided to the Commission in the TRTP proceeding raises concerns that 4,500 MW of wind energy may not even be constructed to justify the proposed project?

\[\text{Page 2 @ 6 and Page 6 @ 12 in Southern California Edison Company's June 27 2007 Testimony}\]
Comment Set A.16, continued: Acton Town Council

Finally, the Acton Town Council notes that, even if 4,000 MW or more of new solar generation sources are constructed in the vicinity of the 4,500 MW of wind generation already identified in the TWRA, it is likely that the TRTP project as proposed by SCE would still not be necessary. Why? Because the CAISO has determined that wind and solar generation sources operate in a complementary manner which could eliminates the need to construct transmission capacity to accommodate both sources simultaneously. CAISO notes:\(^8\):

“Based on historical performance, there is an advantage to having the wind generation more available at off-peak hours and the solar generation available primarily at on-peak hours using the same transmission facilities for delivery”.

The bottom line: if the underlying purpose of the proposed project is to accommodate 4500 MW of TWRA wind power and address the “South of Lugo” constraints, then the proposed TRTP project is not needed for this purpose. This statement holds true even if 4,000 MW of solar energy is co-located with the 4,500 MW of wind energy in the vicinity of the TWRA.

2.0 MOST OF THE PROPOSED TRTP SEGMENTS ARE UNNECESSARY TO ACHIEVE THE PROJECT OBJECTIVES

While it is true that the proposed TRTP project will successfully meet the project objectives, it is also true that most of the transmission infrastructure proposed for the project is not actually necessary to meet the project objectives. As indicated above, the TRTP infrastructure proposed by SCE will accommodate far more than 4,500 MW of wind power. To analogize, SCE is proposing to construct an aqueduct when a small water main will suffice. This analogy is appropriate because, if approved, the TRTP project will be grossly overbuilt for the purpose it is intended to serve. Unfortunately, the Draft EIR/EIS fails to discuss or even disclose this fact even though it becomes self-evident after a careful review of the project components. For example, the three proposed 500 kV transmission lines south of Vincent which replace three existing 230 kV transmission lines will actually terminate in 230 kV substations, and can therefore never be operated at the proposed 500 kV voltage without additional upgrades (which of course, are omitted from the proposed project). In fact, CAISO’s analysis of what is “electrically necessary” to interconnect 4500 MW under N-0, N-2 and N-3 conditions assumes that all the Rio Hondo-Vincent and Mesa-Vincent lines are operated at 230kV\(^8\). This constitutes half of Segments 6 & 7 and all of Segment 11!

Even more astonishing (and as described in more detail below), what the TRTP identifies as the Mira Loma-Vincent 500 kV line (Segments 6, 7 and 8) is actually two separate transmission lines (Mesa-Vincent and Mesa-Mira Loma) that seem to be constrained to 230 kV operation due to the absence of 500 kV equipment at the Mesa substation!!

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\(^8\) Pg 5 of the CAISO’s August 2008 Report on Preliminary Renewable Transmission Plans (also see pg 15)
\(^h\) CSRTTP 2006
Comment Set A.16, continued: Acton Town Council

The fact remains that it is not necessary to construct OR operate Segments 5, 7, 8, 11 and half of Segment 6 at 500 kV to interconnect 4,500 MW of power from the TWRA. In fact, more than 4,500 kV of Tehachapi power can be accommodated with only existing transmission lines if the idle circuits south of Vincent are properly reconfigured and perhaps even reconducted (as discussed below).

The Acton Town Council presumes that SCE (and perhaps the Commission) will argue that the excessive and unnecessary infrastructure proposed for the TRTP projects will be useful in the future to accommodate additional TWRA power (up to 8,000 MW) sometime in the future. However, CEQA renders this argument invalid because the project objectives articulated for the TRTP do not include the interconnection of 8,000 MW of power. CEQA specifically obligates the Commission to consider TRTP alternatives that minimize project impacts while meeting most (but not necessarily all) of the STATED project objectives. It certainly does not authorize the Commission to approve (or even contemplate) a project which generates many significant environmental impacts merely for the purpose of exceeding the stated project objectives.

If SCE's actual goal in proposing nearly 200 miles of 500 kV circuits is to accommodate 8,000 MW of power, then that fact should have been incorporated in their PEA and properly reflected in the Draft EIR/EIS Project Objective Statement. But it is not included in the Draft EIR/EIS, and the Commission cannot simply pretend that it is. Ultimately, CEQA will not permit the Commission to approve TRTP project proposed by SCE because it is NOT necessary to meet the stated Project Objectives, to wit:

1. As evidenced by CAISO's documents, Objective 1 can be met without most (if not all) of the 500 kV infrastructure proposed by Segments 5, 6, 7, 8, and 11.

2. According to SCE's TRTP PEA (page 1-6), the previously approved projects known as Segments 1 and 2 of the Antelope Transmission Project (ATP) are adequate for the purpose of providing "sufficient transmission capacity to reliably serve the forecast load growth beyond the 10 year planning window in the Antelope Valley". So, as evidenced by their own PEA, SCE demonstrates that TRTP is not necessary to meet Objective 2.

3. As proposed, the Mira Loma-Vincent 500 kV line will be routed through the Mesa substation and will therefore be constrained to operate at 230 kV (since the Mesa station has no 500 kV capability). Upgrading the Mesa station to 500 kV standards is specifically NOT included in the proposed TRTP project. It therefore follows that, since the new Mira Loma-Vincent line described in the Draft EIR/EIS as operating at 230 kV will in fact achieve Project Objective 3, then it need not be constructed to 500 kV standards.

4. Although not specifically stated, it appears that the Mesa-Vincent 500 kV line proposed as Segment 11 is may be considered a necessary component to meet Project Objective 3. If so, the Acton Town Council notes that Segment 11 cannot be operated at 500 kV until the Mesa and Gould substations are upgraded to accommodate 500 kV circuits, and these upgrades are specifically NOT included in the proposed TRTP project. Thus we conclude that constructing Segment 11 to 500 kV standards is not necessary to achieve Project Objective 3 since it cannot be operated at 500 kV anyway. In fact, (as discussed below) reconstruction of any lines included in Segment 11 is not needed to meet the stated Project Objectives.
Comment Set A.16, continued: Acton Town Council

The record definitively establishes that none of the 500 kV infrastructure proposed for the TRTP project “south of Vincent” can be operated at 500 kV without further (and substantial) infrastructure expansions. The record also clearly shows that most (if not all) of the 500 kV infrastructure proposed for the TRTP project is not necessary to transmit 4,500 MW of power from the TWRA or address the “South of Lugo” constraints or to increase reliability in the Antelope Valley Area. So it is inappropriate for the Commission to approve those segments of the TRTP which are unnecessary to achieve those stated project objectives.

3.0 THE DRAFT EIR/EIS FAILS TO DISCLOSE THAT THE TRTP PROJECT CREATES UNNECESSARY IMPACTS BY INCLUDING INFRASTRUCTURE THAT IS NOT NEEDED TO MEET THE PROJECT OBJECTIVES

As discussed above, the TRTP project as proposed by SCE creates transmission lines and 500 kV circuit opportunities which 1) Are functionally unnecessary to achieve any of the project objectives; 2) Unnecessarily increase the associated project impacts; 3) Unnecessarily increase the project cost; and 4) Were never included in the project that CAISO approved. This extraneous transmission infrastructure is attributed to SCE’s baffling plan to terminate the new Mira Loma 500 kV line at the Mesa substation rather than at the Mira Loma station. Even more mystifying is SCE’s proposal to construct an additional double circuit 500 kV line between Mesa and Mira Loma that seems to serve no project-related purpose. Indeed, it is likely that this extraneous routing hinders achievement of the project objectives by increasing project impacts and cost. The Acton Town Council also notes that route proposed for the Mira Loma-Vincent 500 kV line through Vincent was never even considered by CAISO in their review of Segments 1-111. So there is no evidence in the record that SCE’s proposed “detour” through the Mesa substation is even electrically “acceptable” from a transmission grid management perspective.

The PEA submitted by SCE with their TRTP application provides no reason for routing the proposed Mira Loma-Vincent line through the Mesa Substation despite the fact that it effectively creates superfluous Rio Hondo-Mesa and Mesa-Mira Loma transmission lines and unnecessary 500 kV circuit opportunities. This deficiency is perpetuated and even amplified by the Draft EIR/EIS, which fails to identify these transmission lines by name or portray them in any operational context. The reasons for omitting any discussion of these superfluous transmission lines in either the PEA or the Draft EIR/EIS are not clear, although the Acton Town Council suspects SCE intends to use them to create a second Vincent-Mira Loma 500 kV connection. Whatever the reason, they are certainly not necessary to achieve the project objectives, and should therefore be excised from the TRTP project. This is easily accomplished by routing the Mira Loma-Vincent 500 kV line east (toward Mira Loma) from the “San Gabriel Junction.”

Better yet, further cost reductions would be achieved by re-routing the Mira Loma-Vincent 500 kV line into an existing adjacent ROW at MP 10.5 located at the northeast corner of the 605/60 junction and directing it from there down along the eastern edge of the Pico Rivera Bicentennial Park where it will meet up with the proposed segment 8 configuration in the existing Chino-Mesa 220 kV ROW. This configuration will eliminate nearly 10 miles of unnecessary and physically imposing double-circuit, high voltage transmission lines.

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See page 5 of CAISO’s January 18, 2007 Memorandum to the Board of Governors.
Comment Set A.16, continued: Acton Town Council

4.0 THE ALTERNATIVE ANALYSIS FAILS TO CONSIDER OPTIONS WHICH MEET ALL THE PROJECT OBJECTIVES AND HAVE NO OR LOW ASSOCIATED ENVIRONMENTAL IMPACTS

The Acton Town Council contends that the alternatives analysis presented in the Draft EIR/EIS contains serious and substantial flaws:

- The alternatives analysis is predicated on the erroneous assumption that most of the proposed segments must be constructed to 300 kV standards in order to meet all the project objectives.
- The Draft EIR/EIS refuses to acknowledge the "inconvenient truth" that, as proposed, Segments 6, 7, 8 and 9 are specifically designed to operate at 230 kV because they all terminate at 220 kV substations and cannot therefore be operated at 500 kV. Thus it is obvious that they need not be constructed at 500 kV to accommodate 4,500 MW of Tehachapi power or address the "South of Lugo" constraints. This important factor is ignored by the Draft EIR/EIS, which rejects many alternatives simply because they are not constructed at 500 kV specifications.

- Other than Segment 6, the Draft EIR/EIS alternatives analysis fails to individually consider each transmission line within the context of a proper alternative analysis. The Draft EIR/EIS improperly adopts an "all or nothing" approach to the alternatives analysis and thereby rejects perfectly reasonable alternatives. For instance, on page ES-33, the "Minimize 500 kV Upgrades" alternative failed to consider each individual transmission line that comprises Segments 6 and 11 in the determination of whether or not they could be constructed as 220 kV circuits. As indicated previously, both SCE and CAISO acknowledge that 4500 MW of Tehachapi power can be accommodated by the proposed TRTP project if the Rio Hondo-Vincent portion of Segment 6 and all of Segment 11 are operated at 230 kV. But this "inconvenient truth" is ignored in the Draft EIR/EIS alternatives analysis, which improperly considers only 230 kV operation of the COMBINED Segment 6 and 11 transmission lines rather than considering each line individually.

- The Draft EIR/EIS rejects reasonable project alternatives on the basis that they do not "adequately provide for future transmission needs." The Acton Town Council is baffled by this statement. What "future transmission needs" are contemplated by the Draft EIR/EIS? If these unidentified "future transmission needs" form the basis for rejecting alternatives, why are they not included in the Statement of Project Objectives? CEQA does not permit the Commission to fabricate ancillary project objectives which are not supported by the underlying project purpose, and then turn around and randomly apply these counterfeit objectives to reject perfectly reasonable and appropriate alternatives.

- The Draft EIR/EIS fails to individually consider each segment and therefore ignores reasonable alternatives. The Draft EIR/EIS does not independently analyze each segment proposed by SCE, and thus fails to identify alternatives that achieve the project objectives and substantially reduce the environmental impacts. Consider for example, Segment 11. According to the routing description provided by the Draft EIR/EIS, SCE proposes to construct the Segment 11 Vincent - Gould connection by a) connecting the existing Pardee-Vincent #1 to the northern portion of the idle Pardee-Vincent #2 line to maintain the connection into Vincent as a complete Pardee-Vincent circuit; b) connecting the northern portion of the existing Pardee-Eagle Rock line to a currently idle Eagle Rock-Vincent line to maintain the connection into Vincent and create a second Pardee-Vincent circuit; c) replacing the north 4 miles of the existing Pardee-Vincent #1
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and the south 15 miles of the Eagle Rock-Pardee line with 500 kV infrastructure to create Segment 11. These modifications will create 2 Pardee-Vincent transmission lines and one Vincent-Gould transmission line. Since SCE does not propose to remove any structures other than those that will be replaced, it is assumed that SCE plans to leave the unattached and unattractive transmission structures from the western portion of the Pardee-Vincent #2 line and the southern portion of the Eagle Rock-Gould-Vincent line corridor.

Assuming that this Segment 11 description is accurate, the “before” and “after” Segment 11 transmission line configurations are:

**BEFORE**
- Pardee-Vincent #1
- Pardee-Vincent #2
- Gould-Eagle Rock-Vincent
- Pardee-Eagle Rock-Gould

**AFTER**
- Pardee-Vincent #1
- Gould-Eagle Rock-Vincent (Segment 11)

It is not clear to the Acton Town Council why SCE would propose to spend substantial amounts of time and money on Segment 11 just to end up with fewer circuits. Obviously, our understanding that the TRTP project is intended to expand transmission capabilities is incorrect. Even more perplexing is SCE’s proposal to create a “new” Gould-Vincent transmission line when there is already an existing Gould-Vincent transmission line that currently sits idle. At a minimum, the alternatives analysis should have considered energizing the existing Gould-Eagle Rock-Vincent line rather than constructing an entirely new transmission line for Segment 11. Since CAISO’s analysis of the TRTP project assumes that Segment 11 is operated at 230 kV anyway, this alternative is electrically identical to the proposed project, but it introduces NO new environmental impacts.

Another example is found in the Draft EIR/EIS’s consideration of Segment 6. SCE proposes to create two 500 kV lines with Segment 6 but will operate only one of them at 500 kV, thereby creating unnecessary impacts. The Draft EIR/EIS considered the alternative (Section 3.2.5) where the existing Rio Hondo-Vincent #2 230 kV line is cut over to the existing Antelope-Mesa #230 structures and the new Mira Loma-Vincent line is constructed using the existing 500 kV infrastructure of the Rio Hondo-Vincent #2 line. This alternative will eliminate nearly all of the impacts associated with Segment 6. But the Draft EIR/EIS rejects this alternative because “the Antelope-Mesa 220 kV line remains in place” as a choke point. What the Draft EIR/EIS fails to consider in the rejection of this alternative is that 500 kV Rio Hondo-Vincent line which will replace the Antelope-Mesa line will still be a choke point because it cannot operate at 500 kV (for reasons stated above). SO this rejection of an alternative for reasons that will exist even if the proposed project is fully constructed in ridiculous.

Another example is found in the Draft EIR/EIS’s consideration of Segments 7 and 8: The purpose of the Mira Loma-Vincent line is to connect Vincent with Mira Loma (presumably). Yet (and inexplicably), SCE proposes to terminate the Vincent-Mira Loma line at the Mesa substation rather than the Mira Loma station. One alternative that will successfully avoid ALL the impacts associated with the two double circuit 500 kV lines into the Mesa substation is to merely route the Mira Loma-Vincent line into Mira Loma rather than Mesa. This can be easily accomplished by transferring the Mira Loma-Vincent line into the Chino-Mira Loma ROW at the “San Gabriel Junction”. This is electrically identical to the project approved by CAISO (in fact,
IT IS the project approved by CAISO) and it also provides the opportunity to remove all the unnecessary Antelope-Mesa and Mesa-Mira Loma structures between the "San Gabriel Junction" and the Mesa substation.

The Draft EIR/EIS Rejects The Reconductoring Alternative Without Basis: The Draft EIR/EIS offers only a cursory review of the reconductoring alternative, which was largely taken directly from SCE’s PEA and therefore rejected out of some unsupported notion that reconductoring with composite core conductors provides only a 50% increase in transmission capacity. The Draft EIR/EIS cites no documents to support this 50% capacity limitation, and the Acton Town Council notes that this assumption directly contradicts EPRI and PG&E studies that were recently presented to the Commission. These studies demonstrate that high temperature low sag (HTLS) conductors can actually double the transmission capacity without changing the system operating voltage.

Based on the flawed assumption that reconductoring will only achieve a 50% capacity increase, the Draft EIR/EIS improperly concludes that the reconductoring alternative would necessitate reconstructing the lines to 500 kV standards anyway. The Acton Town Council is particularly offended by this sloppy and superficial evaluation; we note that the Draft EIR/EIS does not even bother to establish the existing capacity of all the lines into and out of Vincent (including the Rio Hondo #2 line and the Antelope-Vincent line) before determining that the 50% increase of these existing capacities at 220 kV is insufficient. Had the Draft EIR/EIS conducted a proper engineering analysis (even based on a 50% capacity increase assumption), the results could have been reconciled with a more accurate capacity factor to demonstrate conclusively that reconductoring is the ideal alternative for meeting all the project objectives and avoiding virtually all environmental impacts.

The Acton Town Council postulates that reconductoring the Antelope-Mesa line with an HTLS system that increased the capacity by a factor of two and properly routing this line to Mira Loma will provide a transmission capacity into Mira Loma that exceeds the capacity that will be achieved by the Mira Loma-Vincent portion of Segments 6, 7, and 8 proposed by SCE for the TRTP. It will enable the transmission of 4,500 MW of TWRP power and address the "South of Lugo" constraints with few ancillary impacts. In fact, reconductoring all the lines identified in Segments 6, 7, 8 and 11 with an appropriate HTLS conductor will accommodate far more than the 4,500 MW of TWRP power while simultaneously eliminating any need for the proposed 500 kV upgrades of the Vincent substation AND avoiding most of the significant impacts of the proposed project.

We further note with some irony that a primary reasons for rejecting the reconductoring alternative in the Draft EIR/EIS also serves as a basis for rejecting most of SCE's proposed TRTP project. The Draft EIR/EIS asserts that this alternative is infeasible because "the amount of increased system transmission capability on a 220 kV voltage level would be limited by other existing 220 kV transmission elements between the Vincent and Pardee Substations and the L.A. Basin". What the Draft EIR/EIS fails to point out that the TRTP project itself is burdened with precisely the same limitation since all of the proposed 500 kV lines from Vincent are directed into substations that have no 500 kV capability and are therefore also "limited by other existing 220 kV transmission elements".

See presentations given at the January 23, 2009 Technology Workshop hosted by the CPUC
Comment Set A.16, continued: Acton Town Council

5.0 THE NOISE STUDY CONDUCTED FOR THE VINCENT SUBSTATION AREA SUBSTANTIALLY UNDERREPORTS THE NOISE IMPACTS OF THE PROPOSED TRTP PROJECT.

The Acton Town Council understands that the noise impact analysis provided in the Draft EIR/EIS was prepared by SCE’s consultant, and it includes no assessment of the completeness or accuracy of SCE’s information. We further note (with some concern) that the noise analysis results (Table 3.10-5) reported for the area in Acton identified as “South of Vincent” do not reflect actual conditions that will be created by the proposed project. The “Future Audible Corona Noise” that was modeled for the “South of Vincent” locations assumes that there are six 220 kV lines, one 500 kV line and one 500 kV line operated at 220 kV. Certainly this analysis does not suggest that the Draft EIR/EIS assumes only one of the three 500 kV lines proposed for the TRTP project “South of Vincent” will be operated at 500 kV. That would not make sense, nor would it support the Draft EIR/EIS’s fundamental assumption that all segments and voltages identified for the proposed project are necessary to meet the project objectives. We therefore conclude that the noise analysis developed for the “South of Vincent” location is deficient. A proper analysis would have considered three 500 kV lines and five 220 kV lines at this location.

Similarly, the modeled results for existing conditions at the “South of Vincent” location should have considered only six 220 kV lines rather than eight because that two of the exiting lines at this location (Vincent-Pardoe #2 and Vincent-Eagle Rock) are idle and therefore do not contribute to the existing noise profile. The Acton Town Council is certain that these deficiencies would have been identified if the project noise impacts had been given the serious attention that is merited. But instead, the SCE noise study was incorporated verbatim into the Draft EIR/EIS, without independent review and in violation of CEQA.

The Acton Town Council also finds it quite remarkable that the “South of Vincent” location has at least twice as many conductors as any other location that was analyzed, yet it has the lowest associated audible noise level at the edge of the ROW. Certainly the Draft EIR/EIS does not suggest that increasing the number of conductors will decrease the noise level?

6.0 THE INCLUSION OF TRTP INFRASTRUCTURE THAT IS NOT NECESSARY TO MEET THE PROJECT OBJECTIVES SIMPLY CANNOT BE JUSTIFIED

The Acton Town Council anticipates that SCE and others may try to justify inclusion of the unnecessary infrastructure identified above in the TRTP project by resorting to that worn-out argument that it will accommodate future generation beyond 4,500 MW while maximizing the capability of limited transmission corridors and minimizing environmental impacts. However this argument is completely without merit. First of all, we have successfully demonstrated that there is already more than enough existing infrastructure available to construct Segments 5, 11, and half of Segment 6 with little or no “tear-down”. Repurposing this existing infrastructure in the manner described in Section 4.0 will still achieve the project objectives while eliminating nearly all of the associated environmental impacts. It also retains the current configuration of transmission lines into and out of Vincent (for the most part), so it implicitly maximizes corridor capability to achieve the project purpose while minimizing environmental impacts.
Comment Set A.16, continued: Acton Town Council

Secondly, the Acton Town Council notes that there is a tremendous uncertainty in the renewable generation profile of the TWRA and the Antelope Valley. We do not agree with the fundamental assumption that 4,500 MW of transmission capacity may be required to accommodate TWRA wind generation sources, and we have demonstrated that this can be accommodated without most of the TRTP infrastructure proposed by SCE. We have also shown that there is a distinct possibility that no additional infrastructure will be required to accommodate up to 4,000 MW of solar energy in addition to the 4,500 MW of TWRA wind energy. In the face of such evidence, and given the uncertainties of the TWRA renewable generation profile, the Acton Town Council suggests that it is fiscally imprudent for SCE to commit their ratepayers to the expense and burden of the proposed TRTP project (with all the associated and unnecessary infrastructure). We further suggest that concerns that SCE may have regarding transmission capacity in excess of 4,500 could perhaps be addressed by reevaluating option to accommodate increased renewable generation capacity with little infrastructure risk and virtually NO environmental impacts.

Finally, the Acton Town Council notes that both CEQA and NEPA demand that the project purpose be clearly articulated as the fundamental basis for all the project objectives that are established. This is crucial to the development of an appropriate spectrum of project alternatives. Correspondingly, the random application of a project objective which goes far beyond what is needed to satisfy the fundamental project purpose is unsupportable if it is attended by additional significant environmental impacts. Thus giving preference to a project alternative that contributes significant environmental impacts in order to accommodate renewable generation that exceeds 4,500 MW is not justified under CEQA or NEPA if the actual project purpose is to accommodate up to 4,500 MW.

7.0 THE DISCUSSION OF LAND USES IN ACTON IS INACCURATE AND THE CONSIDERATION OF PROJECT IMPACTS ON ACTON LAND USES IS INCOMPLETE

The Draft EIR/EIS asserts that the proposed TRTP project is located “near” Acton, and that the predominant land use in this area is undeveloped “open space”. The Acton Town Council notes that this description was lifted entirely from the SCE PEA without further thought or analysis. It appears that the Commission is unaware that HALF of the Segments proposed for the TRTP project are actually located IN the community of Acton and not “near” the community of Acton. In fact, if all the Segments are approved as proposed by SCE, the TRTP project will visually dominate the entire eastern portion of the community of Acton. The purpose of this intentionally inaccurate description the TRTP project is apparently to minimize the readers understanding of the significant deleterious impact that this project will have on our community. It also clearly ignores scoping comments that were submitted to the Commission nearly two years ago. The Acton Town Council vigorously protests this intentionally inaccurate description of the TRTP project location.

The Acton Town Council is also offended by the Draft EIR/EIS’s inaccurate assumption that the predominant land use in the vicinity of the proposed project located in Acton is “open space” because it improperly implies that the project will not affect any residential- or commercial-
Comment Set A.16, continued: Acton Town Council

zoned properties. As the drafters of the Draft EIR/EIS are presumably aware, the term “open space” as it is contemplated in “land use” discussions generally refers to areas that have been permanently set aside for the purpose of environmental conservation, historical and cultural resource preservation, and providing recreational opportunities. The Commission is advised that virtually none of the TRTP Segments located within the community of Acton are in areas designated as “open space”. In fact the portions of Acton which are impacted by the TRTP project are predominantly zoned for residential and agricultural use. Simply put, the Acton Town Council considers that the Land Use discussion in the Draft EIR/EIS to be at best inaccurate, and at worst, intentionally disingenuous.

Finally, the Acton Town Council notes that the Draft EIR/EIS fails to address the fact that the Draft Los Angeles County General Plan has designated the mile-wide corridors surrounding existing Metrolink stations as potential “Transit Oriented District” (TOD) study areas. This includes the Acton Metrolink station that is located near the Vincent substation and which is bisected by the proposed TRTP project. As the Commission is perhaps aware, TOD districts are characterized by high density residential uses accompanied by high intensity commercial uses and are therefore generally designated as high density “mixed uses”. The Draft EIR/EIS improperly fails to consider the impacts of the proposed TRTP project on this potential land use.

8.0 THE DRAFT EIR/EIS DOES NOT PROVIDE AN INDEPENDENT OR IMPARTIAL ASSESSMENT OF THE PROPOSED PROJECT

The Acton Town Council is concerned that the Draft EIR/EIS does not present a solidly independent analysis of the TRTP project. Our concerns stem from the fact that the Draft EIR/EIS fails to justify the need for all the project components with the underlying project purpose. It also fails to disclose fundamental project deficiencies or identify viable alternatives which meet all the stated Project Objectives and eliminate substantial impacts. The Acton Town Council finds it just too incredible that those responsible for drafting the Draft EIR/EIS were simply unaware that

- SCE’s proposed TRTP project includes substantially more infrastructure than what the CAISO considered in their review and approval of the project;
- The TRTP project as proposed by SCE involves substantially more capital investments than is required to meet the project objectives;
- There is no point to constructing any of the proposed segments “South of Vincent” at 500 kV because the project as proposed precludes their operation at the constructed voltage;
- The CPUC, EPRI, and other IOU’s are all aware that the increased transmission capacity that can be achieved by new reconductoring alternatives is substantially higher than the level stated by the Draft EIR.

For these and other equally compelling reasons (which were not included simply due to a lack of time), the Acton Town Council concludes that, with the possible exception of the Section 8 alternatives analysis, much of the Draft EIR/EIS is merely a mind-numbing restatement (sometimes verbatim) of the SCE PEA. It lacks any sort of penetrating analysis of the individual segments that are proposed and whether or not each segment has been reasonably and
Comment Set A.16, continued: Acton Town Council

appropriately considered. For many of the segments, no alternatives are considered whatsoever. It dismisses (almost without thought) the “no project” alternative despite compelling evidence (provided below) that distributed generation via residential solar systems is less expensive than the proposed project combined with the new renewable generation projects slated for the TWRA.

The Acton Town Council notes that CEQA imposes a substantial burden that the EIR properly reflect the Commission’s independent judgment and analysis of the project [Pub. Res. Code § 21082.1(c)(3) and CEQA Guidelines § 15090]. The Acton Town Council contends that the Draft EIR/EIS does not constitute a reasonably thorough and independent analysis of SCE’s proposed TRTP project, and so it does not satisfy the Commission’s obligation under CEQA.

9.0 THE SUBSTANTIAL COSTS OF THE PROPOSED TRANSMISSION PROJECT AND THE RENEWABLE GENERATION SOURCES THAT IT PURPORTS TO SERVE ARE NOT JUSTIFIED.

SCE has stated\(^k\) that the combined ATP and TRTP projects approved by the CAISO will cost $1.8 billion, and that this investment will permit SCE to access up to 4,500 MW of renewable generation resources in the TWRA. [For the purpose of this analysis, the Acton Town Council will ignore the fact that this cost is much less than the actual projected cost because it excludes much of the infrastructure proposed by SCE for the TRTP]. We will also ignore the fact that the actual cost of completing Segments 1-3 is three times more than SCE originally presented in the ATP proceedings\(^l\). Considering just the initial $1.8 billion construction costs associated with the ATP/ TRTP to accommodate 4500 MW, a “lower bound” $400/kW transmission cost is derived. Combining this cost with the $4,500/kW capital cost of new renewable solar resources\(^m\) planned for the TWRA (before tax credits or other incentives are applied) yields a combined capital cost of nearly $5,000/kW for generating and transmitting solar energy from the TWRA. Conversely, the capital cost for a roof mounted residential PV solar kit is less than $4,900/kW\(^n\) (before tax credits or incentives are applied). This simple analysis clearly demonstrates that the ratepayers will not benefit from either the proposed expansion of SCE’s transmission facilities through the TRTP project or the installation of additional solar-based renewable projects which will be accessed by the excessive infrastructure proposed by the TRTP. Incidentally, a more detailed “levelized cost” analysis which considers O&M costs further illustrates the economic non-viability of these projects.

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\(^k\) Page 5-9 of SCE’s Conceptual Transmission Requirements and Cost for Integrating Renewable Resources dated November 8, 2006
\(^l\) Ibid. Pg 2-3
\(^m\) See the Administrative Law Judge’s Scoping Memo and Ruling issued March 17, 2009 in the TRTP proceeding
\(^n\) See NREL Report “Economic, Energy, and Environmental Benefits of Concentrated Solar Power in California” Dated April 2006. This is consistent with the $2 Billion estimated to construct the 553 MW Soleil system proposed for construction in the Mojave Desert.
Comment Set A.16, continued: Acton Town Council

10.0 THE DISCUSSION OF ENVIRONMENTAL IMPACTS ASSOCIATED WITH A POTENTIAL TERRORIST ATTACK IS INSUFFICIENT FOR THE PURPOSES OF NEPA.

The ATC finds the following statements addressing this issue in the Draft EIR/EIS:

"A terrorist attack on the proposed TRTP would likely result in reduced or disrupted electricity transmission to the regional electric grid (i.e., to the substations that distribute electricity to customers). As is common practice when a line is down, the utility would have to re-route power around the affected substation or transmission line to serve the southern California load, and an outage could occur for some period of time while the system was modified to provide service from other substations. Therefore, the regional transmission system is interconnected in such a way that it is not possible to say that a single line outage would cause an outage at a specific sensitive facility, such as a hospital, airport, security facility, etc. In addition, although most facilities of this type may receive electric power from substations supplied by the proposed TRTP, major facilities would also have back up power generators to prevent electricity interruptions in the event of an outage, such as would occur with a terrorist attack on a transmission line."

AND

"Full-time operational staff at the substations associated with the TRTP would range from zero to five, and work crews of one to five persons would periodically visit the station to perform routine maintenance and inspection activities. Therefore, an attack on one or all of the Project substations is unlikely to result in a high incidence of human injury or mortality."

AND

"A terrorist attack on the transmission line could also result in downed towers. Transmission line towers would range in height from 65 to 255 feet. Portions of the proposed transmission line route would be located in residential areas with residential structures as close as 75 feet from the transmission line towers. It is possible that transmission line towers could fall and strike a residential structure as a result of a terrorist attack, resulting in property damage and potential injury or mortality to residents."

The Acton Town Council notes with some concern that these statements address only line outage impacts (which are mitigated by rerouting), impacts to substation employees (which are considered negligible) and the impacts of collapsed towers on residential neighborhoods. Nowhere does the Draft EIR/EIS address or even consider how the proposed TRTP substantially increases the vulnerability of the CAISO controlled grid, SCE's customers, and the community of Acton to both environmental and service impacts that would be caused by a serious attack on the Vincent substation.

CAISO has designated Vincent as one of five key "bulk power substations" through which SCE imports power to support their customer load. To the Town Council's understanding, ALL OF
Comment Set A.16, continued: Acton Town Council

the power currently flowing south from the TWRA to SCE's customers is routed through the Vincent substation, and this situation will change only slightly with the completion of the Antelope-Pardee line since it will not operate at 500 kV until the Pardee substation is equipped for 500 kV service. The proposed TRTP project will substantially expand the size of the Vincent substation as well as SCE's reliance on Vincent to adequately supply power to their customer load. This will a) Render the Vincent substation a more attractive terrorist target; b) Increase the impact of a terrorist attack to the surrounding community of Acton; and c) Substantially increase the vulnerability of SCE's customers to the significant and long term impacts of a serious terrorist attack on the Vincent substation. There is an absolute proximate and causal link between the approval of the TRTP project and an altered risk of terrorist attack.

The Draft EIR/EIS does acknowledge that “While the possibility of a terrorist attack on the proposed TRTP exists, the proposed Project is not considered to be a high level or likely target for attack, because consequences of a potential attack while serious and adverse would not result in catastrophic consequences to the regional electric grid. Any human injury or death resulting from a terrorist attack would be serious, tragic, and difficult to prevent, however, the overall risk of an attack on the proposed TRTP is not considered likely”

The Acton Town Council respectfully disagrees, and asserts that this analysis is so general and superficial that it is insufficient for the purposes of NEPA. We do not raise this issue with the intention of delaying or otherwise thwarting SCE’s CPCN application for the TRTP. Rather, we merely seek to ensure that the scope and extent of the site-specific impacts on the community of Acton and SCE ratepayers that would be created by a terrorist attack on the Vincent substation be clearly articulated in the environmental document that is prepared pursuant to the TRTP project. This is necessary to achieve NEPA’s purpose of insuring a fully informed and well-considered decision.

11.0 THE DRAFT EIR/EIS ERRONEOUSLY CONCLUDES THAT THE PROJECT WILL HAVE AN INSIGNIFICANT IMPACT ON AERIAL FIREFIGHTING EFFECTIVENESS.

The EIR states (page 3.16-25) that the portion of the proposed project located in the Tehachapi fireline will “present only a marginal increase in the required altitude of aerial vehicles working through the shared ROW” because there are already existing transmission lines in these ROWs and because the height increase would only be 50 feet on average. While this statement may apply to most areas affected by the project, it does NOT apply to Acton. The TRTP will result in the placement of THREE 200 ft tall transmission lines (see figures 2.2-56-58 and 2.2-10 to 11) in two ADJACENT corridors and in close proximity to Acton residents. Thus, it presents a SUBSTANTIAL increase in the required altitudes of aerial vehicles fighting fires in the portion of Acton located south of the Vincent Substation. According to the discussion of firefighting tactics provided on pages 3.16-13 and 14, the project will prevent firefighters from protecting the

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*2007 CAISO transmission plan (pg118).
*SCE Conceptual Transmission Requirements And Costs For Integrating Renewable Resources
Comment Set A.16, continued: Acton Town Council

residences in Acton that are located south of the Vincent substation (especially those located between the Segment 6 corridor and the segment 11 corridor). It is simply appalling that the Draft EIR/EIS deems this likely loss of Acton residences to be a minor (Class III) impact.

The Acton Town Council does not agree with the Draft EIR/EIS's offhanded conclusion regarding this matter, and expects that the EIR/EIS be revised to acknowledge the very real and very substantial impact that the proposed project will have on wildfire prevention and suppression in Acton. The Acton Town Council notes with further irritation that all of the project objectives can easily be fully met without the 500 kV infrastructure proposed for Segments 6 or 11 through the reconductoring alternative. In short, the Acton Town Council asserts that the community of Acton should not be forced to endure the unnecessary and completely avoidable Class I fire suppression and control impacts that the proposed projects will create.

The Acton Town Council concurs with the Draft EIR/EIS conclusion that the proposed project will have significant cumulative impacts on:

- Reducing the effectiveness of firefighting efforts.
- The incidence of wildfires attributed to construction and maintenance activities.
- The devastation and risk of wildfire ignitions.
- Firefighter safety.
- The introduction of non-native plant species contributing to rate of fire spread.

We further note that these cumulative impacts need not be endured by the community of Acton, because (as we have previously demonstrated) all of the project objectives can be fully met WITHOUT the reconstructed 500 kV transmission lines into and out of the Vincent substation.
Response to Comment Set A.16: Acton Town Council

A.16-1 Regarding the commenter’s concern that the proposed infrastructure is not necessary to meet the Project objectives, there are no requirements under NEPA that all infrastructure proposed as part of a project be necessary to meet project objectives (See 40 CFR §1502.13). Please see Draft EIR/EIS Section 1.2 for discussion of the Project’s objectives and the purpose and need. These project objectives/purpose and need were appropriately used in screening for potentially feasible alternatives which accomplish most of the project objectives (see Draft EIR/EIS Appendix A). For additional information on the alternative screening methodology, please see General Response GR-1 of the Final EIS.

The independent analysis of purpose and need conducted for the proposed Project was designed to review the findings of SCE, the California ISO, the Federal Energy Regulatory Commission, the California Energy Commission, and the Tehachapi Collaborative Study Group regarding the need for the Project. The CPUC is required to independently evaluate the need for a project prior to approving the project. The memorandum referenced in the comment contains information protected by the Critical Energy Infrastructure Information Act, and, therefore, is not publicly available. A written request for a redacted version of the memorandum may be made to the CPUC. NEPA does not require that this information be included in the EIR/EIS.

A redacted version of the requested memorandum, removing information that is protected by the Critical Energy Infrastructure Information Act, was provided to the commenter by the Forest Service on May 20, 2009. Note that no formal written request for the document was ever directly submitted to the CPUC.

A.16-2 Please see response to Comment A.16-1 regarding the proposed infrastructure and how it relates to the Project objectives, purpose and need.

As discussed in Data Request Set TRTP ACTON-01 (Question #3), the design of the TRTP considered serving forecasted load growth and providing the necessary transmission to meet the generation interconnection needs in the area. As part of the CAISO’s South Regional Transmission Plan for 2006 (CSRTP 2006), multiple conceptual arrangements were evaluated and eliminated because they did not consider both load-serving needs and generation interconnection needs. The conceptual plans that were eliminated would result in designs that would not address both needs.

Also, as discussed in Data Request Set TRTP ACTON-06 (Question #1, Part 2), based on the numerous alternatives examined to interconnect up to 4,500 MW in the Tehachapi Area as part of the CSRTP 2006 planning process, the project scope associated with the TRTP was determined to be the least-cost alternative needed to interconnect up to 4,500 MW in a manner that meets applicable North American Electric Reliability Corporation (NERC), Western Electricity Coordination Council (WECC), and CAISO criteria. Without these additional transmission line and substation upgrades, interconnection of new generation resources up to 4,500 MW cannot be accommodated.

Furthermore, as discussed in Data Request Set TRTP ACTON-12 (Question #2, Part B) the CAISO-approved project would not be and is not identical in all aspects to the proposed TRTP. The reason is because the CAISO’s role in transmission planning is limited to
determining the need for a proposed transmission project. The CAISO specifically does not have any involvement in developing the final design for the transmission line routes and/or completing substation siting to support the proposed plans. The CSRTP 2006 is a conceptual planning document and does not include the details required to actually implement such plans.

A.16-3 In reviewing the 2007 SCE Conceptual Transmission Requirements and Costs for Integrating Renewable Resources, no statement could be found indicating that the proposed TRTP infrastructure into and out of Vincent is not needed until the Tehachapi area exports more than 4,500 MW through Vincent, as the commenter suggests. Nor were any references to concerns that the 4,500 MW of wind energy may not be constructed to justify the TRTP. Furthermore, the pages referenced in the footnote (Page 2-6 and Page 6-12) do not exist.

Section 5 of the 2007 SCE Conceptual Transmission Requirements and Costs for Integrating Renewable Resources report addresses SCE’s conceptual transmission requirements for integrating wind resources in Los Angeles and Kern Counties. Table 5-1 shows a total of 4,060 MW of renewable resources in Kern County and 415 MW in Los Angeles County identified by the California Energy Commission (CEC) as of December 1, 2003. It is stated that “Currently, there are a total of twenty-six wind generation projects totaling 5,789 MW, two solar generation projects totaling 712 MW and four non-renewable gas-fired projects totaling 1,502 MW in the CAISO and SCE interconnection queue which require transmission upgrades in this area. These interconnection applications indicate that more wind generation development is likely earlier in the process than was forecast by the CEC.” SCE states that “[a]ll of these resources impact flow South of Antelope.” As such, there does not appear to be any concerns that 4,500 MW of wind energy may not be constructed, as purported by the commenter.

While it is stated under the study methodology in Section 5.3 that “[m]odifications to the previous Transmission Ranking Cost Report were extensive due to the additional upgrades required to interconnect and deliver generation levels in excess of the 4,500 MW that the TRTP provides”, these additional upgrades are described separately from the components of the TRTP. The transmission and substation upgrades described in the first part of Section 5-4 (before Figure 5-1) are specifically described as being necessary “[i]n order to integrate the initial 4500 MW of resources in this area” and are generally limited to those upgrades associated with TRTP. The additional upgrades needed for interconnection requests beyond the initial 4,500 MW are detailed separately under “Facilities for Wind Generation Identified in Response to SCE’s Request for Information” and detailed in Figure 5-2.

Please see the above response to Comment A.16-2 regarding the project infrastructure and how it relates to the project objectives, purpose and need.

A.16-4 The Project is being proposed to accommodate wind energy projects, although it may not be limited to wind energy, as SCE must interconnect and integrate power generation facilities into its electrical system as required under Sections 210 and 212 of the Federal Power Act (16 U.S.C. § 824 [i] and [k]) and Sections 3.2 and 5.7 of the CAISO’s Tariff. Serving an additional 4,000 MW of solar energy is not part of the stated purpose and need. The ISO interconnection queue supports this, as shown in Draft EIR/EIS Table 6.2-2, incorporated by reference into the Final EIS, which lists the wind projects in Kern County in the CAISO
Constructing the TRTP to 220-kV standards would not allow for the full integration of the 4,500 MW or adequately address South of Lugo transmission constraints. If built at 220-kV, new infrastructure would be required in the future, which may mean rebuilding the transmission lines to 500 kV as load increases; however, the CAISO may not allow the 220-kV transmission lines to be taken out of service at a later date due to system loading, which would then require that future upgrades be built in parallel, requiring additional ROW width, or built elsewhere, requiring entirely new ROW. These additional upgrades to the system would result in additional environmental impacts, which would exceed those associated with the Project as currently proposed. Furthermore, upgrading the system to 220-kV standards would not necessarily reduce the environmental impacts associated with construction, as the structures in Segments 6 and 11 (for example), would still need to be removed and replaced with new structures due to design limitations (mechanical strength, conductor clearances, etc.) of the existing structures. Therefore, the Lead Agencies eliminated alternatives that would result in the installation of a system that would only meet some initial need for additional capacity, but would not adequately provide for the estimated future transmission needs (up to 4,500 MW) or adequately address the South of Lugo transmission constraints.

As discussed in Data Request Set TRTP ACTON-05 (Question #1, Part H) for Segment 5 (but applies to all segments where 220-kV T/Ls are replaced by 500-kV T/Ls operated at 220 kV), replacing the existing lines would result in new tower infrastructure capable of supporting much larger conductors than are currently supported by the existing transmission tower infrastructure. As designed, all TRTP lines south of Antelope would be constructed with two-bundles of 2156 ACSR line conductor. As such, these new lines, regardless of the operating voltage (220 kV or 500 kV), would not have the same capacity limitations as today’s Antelope-Mesa 220-kV transmission line.

As discussed in Data Request Set TRTP ACTON-01 (Question #4, Part B), as part of TRTP, there is not a Mesa-Vincent T/L. The double-circuit design from Rio Hondo to Mesa and from Mesa to Mira Loma would be operated as a single Mira Loma-Vincent (box-loop
configuration) 500-kV T/L. As a point of clarification, within Segment 11 there is a 220-kV circuit which travels from Vincent to Mesa Substation denoted as the Mesa-Vincent T/L; however, construction of this T/L would not occur in Segment 7, which is the focus of this comment.

A.16-6 The TRTP upgrades proposed by SCE are required to interconnect 4,500 MW of power from the TWRA and to address the South of Lugo transmission constraints. As discussed in Data Request Set TRTP ACTON-06 (Question #1, Part 2), as part of the CAISO’s South Regional Transmission Plan for 2006 Planning Process, numerous alternatives were examined to interconnect up to 4,500 MW in the Tehachapi Area. The project scope associated with TRTP was determined to be the least-cost alternative needed to interconnect up to 4,500 MW in a manner that meets applicable NERC, WECC, and CAISO criteria. Without these additional transmission line and substation upgrades, interconnection of new generation resources up to 4,500 MW cannot be accommodated. Please see response to Comment A.16-5 regarding the transmission planning decisions considered in determining not to build the TRTP to 220-kV standards.

Idle lines exist south of Vincent. However, they will be connected and begin transmitting power as part of the proposed Project. The current lines are only 220-kv and alone are not capable to meet the purpose and need of the proposed Project.

A.16-7 The TRTP upgrades proposed by SCE are required to interconnect 4,500 MW of power from the TWRA, to address the South of Lugo transmission constraints, and address the reliability needs of the CAISO-controlled grid due to projected load growth in the Antelope Valley. It is not designed to accommodate additional TWRA power of up to 8,000 MW as suggested.

There is no requirement under NEPA to limit the description/design of a proposed Project to the stated project’s objectives or that an EIR/EIS may only describe strictly what is necessary to meet those objectives. The function of the EIR/EIS is to evaluate the proposed project and alternatives to that project that meet most of the project objectives and reduce any of the significant impacts of that project. The EIR/EIS fulfills this requirement.

A.16-8 With respect to Item #1, please see the response to Comment A.16-1 and A.16-2 regarding discussion of project objectives and the purpose and need of the Project.

With respect to Item #2, SCE has stated in Data Request Set TRTP ACTON-01 (Question #3) that absent generation interconnections beyond 700 MW in the Antelope Valley area, Segments 1 and 2 would provide sufficient transmission capacity to reliably serve the forecast load growth in the Antelope Valley for more than 10 years. As a follow-up to this, SCE stated in Data Request Set TRTP ACTON-05 (Question #1) that the Antelope Valley load demand is physically served by an extensive subtransmission (66-kV) system and the source for this subtransmission system is the 220 kV to 66 kV transformer banks (“A banks”) at the Antelope Substation. Segments 1 and 2 are not directly related to this subtransmission system but are related to the adequacy of the transmission system (220 kV and above) that delivers the power to the Antelope Substation. Specifically, the completion of Segments 1 and 2 will provide for sufficient transmission system capacity to deliver power to the Antelope Substation A-banks in a manner that meets applicable NERC, WECC, and CAISO transmission system reliability criteria. Furthermore, Segments 1 and 2 will provide reliable service to Antelope Valley load regardless of the status of generation interconnections in the
Tehachapi area but enables interconnection of up to only 700 MW of new generation. TRTP would further address the reliability needs of the CAISO-controlled grid due to projected load growth in the Antelope Valley. The description of the project objectives and purpose and need in Section 1.2 of the Final EIS has been updated to clarify that one of the objectives for TRTP is to further improve reliability given the expected increase in renewable power generation beyond the initial 700 MW.

The design for TRTP considered serving forecasted load growth and providing the necessary transmission to meet the generation interconnection needs of the area. As part of the CAISO’s 2006 CSRTP, multiple different arrangements were evaluated and eliminated from further analysis because they did not consider BOTH load serving needs and generation interconnection needs. Segments 4-11 was designed in a manner that continues to provide reliable service to the Antelope Valley load and enables interconnection of additional generation (levels beyond 700 MW and up to 4,500 MW).

With respect to Items #3 and #4, please see the response to Comment A.16-5 regarding the transmission planning decisions considered in determining not to build the TRTP to 220-kV standards and the design for the Mira Loma-Vincent 500-kV T/L.

With respect to the 500-kV infrastructure proposed south of Vincent, the Mira Loma-Vincent 500-kV T/L would be operated at 500-kV. Please see response to Comments A.16-2 and A.16-5 regarding the objectives and infrastructure determined to meet these objectives.

A.16-9 Please see the responses to Comments A.16-1, A.16-2, A.16-5, and A.16-6 regarding the objectives and infrastructure determined to meet the Project objectives/purpose and need for the TRTP.

As discussed in Data Request Set TRTP ACTON-01 (Question #4, Part B), as part of TRTP, there is not a Mesa-Vincent T/L. The double-circuit design from Rio Hondo to Mesa and from Mesa to Mira Loma would be operated as a single Mira Loma-Vincent (box-loop configuration) 500-kV T/L.

As discussed in Chapter 1, Section 1.2 of SCE’s PEA, SCE does envision a possible future Mesa 500-kV Substation, which can only be accomplished with minimal impacts if 500-kV design specification for the new transmission construction is implemented as part of this Project; however, since the executed Power Purchase Agreements (PPAs) are less than the TRTP 4,500 MW capability and not all projects in the CAISO’s interconnection queue are expected to materialize (i.e., speculative), justification of the additional 500 kV T/Ls and Mesa 500-kV Substation is not appropriate at this time. Therefore, SCE has not included these additional facility upgrades as part of this Project.

There are several potential triggers that may create a need for a future Mesa 500-kV substation. For example, interconnecting generation beyond the 4,500 MW of total TRTP capability and delivery of these future resources south towards the Los Angeles Basin or San Diego service territory may require additional north-to-south transmission capability. The need for such interconnections could also be driven by a State increase in the RPS requirements. Other possible triggers for a potential Mesa 500-kV substation could be the retirement of Los Angeles Basin thermal generating units requiring increased imports or continued load growth beyond the 10-year planning window. As stated above, these triggers
and the possible future need for upgrading the Mesa Substation to 500 kV are speculative at this time.

Please see the response to Comment B.5-4 regarding the proposal to re-route the Mira Loma-Vincent 500-kV T/L into an existing ROW at MP 10.5 and south to Segment 8.

The TRTP upgrades proposed by SCE are required to interconnect 4,500 MW of power from the TWRA and to address the South of Lugo transmission constraints. Please see the response to Comment A.16-5 regarding the transmission planning decisions considered in determining not to build the TRTP to 220-kV standards.

A reasonable range of alternatives were considered as part of the TRTP, as discussed in General Response GR-1 of the Final EIS and the response to Comment A.16-7. Please also see Draft EIR/EIS Appendix A for the Alternatives Screening Report and the rationale contained therein for eliminating alternatives. These alternatives considered limiting upgrades to 220-kV, such as the Minimize 500 kV Upgrades Alternatives, as well as other possible configurations to reduce the total upgrades required for TRTP. Through discussions with SCE it was clear that the system had to be looked at as a whole and not each individual segment, as the overall system capability is determined by the collective performance of all the segments and will be less than the sum of the individual segment capabilities. This methodology of addressing alternatives is appropriate for use in a NEPA document, has not changed since the Draft EIR/EIS, and is incorporated by reference into the Final EIS. As discussed in the Alternatives Screening Report (Draft EIR/EIS Appendix A, incorporated by reference into the Final EIS), many of the alternatives considered which reduced upgrades were eliminated as they would not meet the project objectives of reliably interconnecting the full 4,500 MW or address the South of Lugo transmission constraints. Additionally, the Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations (CEQ, 1981), states that Section 1502.14(b) does not dictate an amount of information to be provided, but rather, prescribes a level of treatment, which may in turn require varying amounts of information to enable a reviewer to evaluate and compare alternatives.

It is acknowledged that 4,500 MW of Tehachapi power could be accommodated by the proposed TRTP if the existing portion of Rio Hondo-Vincent No. 2 (Segment 6) and all of Segment 11 are constructed with 220-kV design standards. However, these structures would need to be rebuilt since the existing structures cannot support conductor (of either conventional or high capacity type) large enough to carry the 4,500 MW. Since the structures must be rebuilt, and the impact of constructing new 220-kV structures is essentially the same as constructing 500 kV structures (except for visual), it is prudent to rebuild them to 500-kV standards. Please see response to Comment A.16-5.

The phrase “future transmission needs” is only used in the Draft EIR/EIS with respect to the “Minimize 500-kV Upgrades Alternative” and refers to future need beyond the initial 4,500 MW. As described in the Alternatives Screening Report (revised) provided in Appendix A of the Draft EIR/EIS and summarized in Section 2.8 of the Final EIR, the “Minimize 500-kV Upgrades Alternative” would not accommodate all planned or expected projects (up to 4,500 MW) or allow for future increases in voltage operation from 220 kV to 500 kV. In other words, this alternative may meet initial needs for additional capacity and reliability, but does not adequately provide for future potential transmission needs that have not been considered.
as part of TRTP. Building a system that only meets initial needs would result in tear down and rebuild to meet future transmission requirements. Prudent planning of transmission upgrades should be based on logical, cost-effective transmission expansions rather than upgrades that are limited to the needs of specific projects. As such, additional future upgrades to the system would cancel out any positive reduction in environmental impacts that this alternative may offer compared to the proposed Project. While the current project does not provide for the use of the all conductors designed at 500-kV to be operated at 500 kV without substation upgrades, TRTP would limit the scope of future upgrades that would be required when and if such upgrades are required.

A.16-12 A reasonable range of alternatives were considered as part of the TRTP, as discussed in General Response GR-1. These alternatives considered limiting upgrades to 220 kV, such as the Minimize 500-kV Upgrades Alternatives, as well as other possible configurations to reduce the total upgrades required for TRTP. Through discussions with SCE it was clear that the system had to be looked at as a whole and not each individual segment, as the overall system capability is determined by the collective performance of all the segments and will be less than the sum of the individual segment capabilities. As such, many of the alternatives considered with reduced upgrades in particular segments were eliminated as they would not meet the project objectives of reliably interconnecting the full 4,500 MW or address the South of Lugo transmission constraints. This methodology of addressing Alternatives is appropriate for use in a NEPA document, has not changed since the Draft EIR/EIS, and is incorporated by reference into the Final EIS. The Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations (CEQ 1981)states that Section 1502.14(b) does not dictate an amount of information to be provided, but rather, prescribes a level of treatment, which may in turn require varying amounts of information to enable a reviewer to evaluate and compare alternatives.

Please see the response to Comment A.16-5 regarding the transmission planning decisions considered in determining not to build the TRTP to 220-kV standards.

When considering existing transmission lines that are near Vincent and relevant to TRTP Segment 11, there is one existing Pardee-Vincent 220-kV line today. There is also one Eagle Rock-Pardee 220-kV line today which runs approximately 4 miles south of Vincent Substation and passes very close to, but does not connect to, the existing Gould Substation. In addition, there are two existing sections of idle (non-energized) 220-kV towers south of Vincent. Each idle section of line is approximately 4 miles in length and does not connect to any substation.

The scope of TRTP Segment 11 involves the separation of the existing Eagle Rock-Pardee 220-kV line into three portions: (a) The northern portion, geographically between the Pardee Substation and a point 4 miles south of the Vincent Substation, would connect to the Vincent Substation via one of the two existing idle 4 mile section of 220-kV towers to form a new Pardee-Vincent No. 2 220-kV line. It should be pointed out that the existing Pardee-Vincent 220-kV line would then be renamed the Pardee-Vincent No. 1 220-kV line. (b) The southern portion, geographically between the Eagle Rock Substation and a point just outside of the Gould Substation, would be connected to the Gould Substation to form a new Eagle Rock-Gould 220-kV line. (c) The central portion, geographically between the northern portion (connected to Vincent Substation as described in (a)) and the southern portion (connected to Gould as described in (b)), would be as described below.
The TRTP Segment 11 would also involve the separation of the existing Pardee-Vincent No. 1 220-kV line into two parts. (a) The western portion, geographically between Pardee and a point 4 miles south of Vincent, would be disconnected from (b) the northern portion, geographically the last 4 miles into Vincent Substation. This will temporarily remove the existing Pardee-Vincent No. 1 220-kV line from operation. The western portion would then be connected to the other 4-mile wide section of existing idle 220-kV towers south of Vincent Substation. This would re-establish the Pardee-Vincent No. 1 220-kV line using today’s idle towers, not today’s energized towers, to complete the last 4 miles into Vincent Substation. Note that at this time both existing idle line sections south of Vincent Substation would be used (one to help re-establish Pardee-Vincent No. 1 and one to help establish a new Pardee-Vincent No. 2). Note also that at this point a “new” 4-mile idle section of line would result; this is what is currently energized as the last 4 miles of today’s Pardee-Vincent No. 1 220-kV line, but completion of construction as outlined below would not leave this piece of line permanently idle.

All of the above scope was, in essence, to create the ability to construct the new Mesa-Vincent No.2 T/L in Segment 11. The new Mesa-Vincent No.2 T/L would ultimately be formed in three sections. (a) The northern section, geographically between Vincent Substation and a point 4 miles south of Vincent Substation, would be formed by a tear-down-and-rebuild of the “new” 4-mile idle section of what was Pardee-Vincent No. 1 (described immediately above). (b) The central section, geographically between a point 4 miles south of Vincent Substation and a point just outside of Gould Substation, would be formed by a tear-down-and-rebuild of the central section of today’s Eagle Rock-Pardee 220-kV line (mentioned in item (c) above. (c) The southern section, geographically between Mesa Substation and a point just outside of Gould Substation, would be formed by stringing new conductor on a vacant position on existing 220-kV towers. The connection of all three sections would form a new Mesa-Vincent No. 2 T/L, energized at 220 kV, from Vincent Substation to Mesa Substation and routed by - but not connecting to - the existing Gould Substation.

Therefore, the correct characterization of TRTP Segment 11 should be as follows:

BEFORE:
Pardee-Vincent 220 kV
Eagle Rock-Pardee 220 kV
Two idle sections of 220 kV south of Vincent (4 miles in length each)

AFTER:
Pardee-Vincent No. 1 220 kV
Pardee-Vincent No. 2 220 kV
Mesa-Vincent No. 2 220 kV
Eagle Rock-Gould 220 kV

As such, the construction of TRTP Segment 11 would not “end up with fewer circuits” as stated. At Vincent Substation, Segment 11 would take one energized and two idle sections (4 miles each) of 220-kV circuits that are not connected on either end and result in three complete and energized 220-kV circuits (two to Pardee and one to Mesa). At Gould Substation, a new connection to the Eagle Rock Substation would be created increasing the
number of lines connecting to Gould Substation. As a point of clarification, there is no Gould-Eagle Rock-Vincent 220 kV T/L (either energized or idle).

Please see the response to Comment A.16-9 regarding the routing and design of the Mira Loma-Vincent 500-kV T/L.

A.16-13 As discussed by SCE in Data Request Set TRTP ACTON-01 (Question #2), the baseline capacity of the existing 220-kV transmission lines south of Vincent Substation are as follows:

<table>
<thead>
<tr>
<th>Existing Transmission Line</th>
<th>Current Rating (MVA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antelope-Mesa</td>
<td>353</td>
</tr>
<tr>
<td>Mesa-Vincent</td>
<td>988</td>
</tr>
<tr>
<td>Rio Hondo-Vincent No. 1</td>
<td>988</td>
</tr>
<tr>
<td>Rio Hondo-Vincent No. 2</td>
<td>988</td>
</tr>
<tr>
<td>Limiting Conductor</td>
<td>353</td>
</tr>
</tbody>
</table>

The capacity of the individual 220-kV transmission lines south of Vincent Substation with a 50 percent increase would be as follows:

<table>
<thead>
<tr>
<th>Existing Transmission Line</th>
<th>50% Increase (MVA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antelope-Mesa</td>
<td>530</td>
</tr>
<tr>
<td>Mesa-Vincent</td>
<td>1482</td>
</tr>
<tr>
<td>Rio Hondo-Vincent No. 1</td>
<td>1482</td>
</tr>
<tr>
<td>Rio Hondo-Vincent No. 2</td>
<td>1482</td>
</tr>
<tr>
<td>Limiting Conductor</td>
<td>530</td>
</tr>
</tbody>
</table>

As shown here and as discussed in the Alternatives Screening Report located in Appendix A of the Draft EIR/EIS, the system is currently limited by the Antelope-Mesa 220-kV transmission line. Reconductoring all existing 220-kV transmission lines south of Vincent to achieve a 50 percent increase (or more) on each line would not eliminate the existing Antelope-Mesa as the limiting conductor.

In evaluating how the use of HTLS conductors can address transmission system loads there are two main considerations. First is what capacity a given transmission line has and second is what is the impedance of the line. The capacity is conductor specific and represents the amount of power that a conductor can carry without excessive sag or damage to the conductor. The impedance is specific for each transmission line and is dependent not only on the resistance of the conductor but also on the length of the line, with the overall line impedance being a function of these two elements (resistance, length) combined.

When multiple transmission lines are in an interconnected grid the amount of power that flows over each individual line is a factor of its impedance, not its capacity. Replacing a conventional conductor with a corresponding HTLS conductor, with similar sag and weight, will substantially increase the capacity of the line, as has been indicated, but will not substantially decrease the impedance. To install an HTLS conductor with sufficiently low impedance in order to substantially increase power flow over a given line, as part of an interconnected grid, is anticipated to require using an HTLS conductor which would have a larger diameter and weight than the existing conductor which would result in tower overloads. As such, the limit of a 50 percent increase between standard and non-standard
conductors, which was provided by SCE in their PEA (Chapter 2, Section 2.4.2.2.1, Page 2-52), took into account only conductors with similar mechanical properties, as use of heavier conductors or conductors with substantially different mechanical properties would necessitate the rebuild of the transmission towers because the existing tower strength would be insufficient to support additional mechanical stress.

As stated in the Alternatives Screening Report (Appendix A), Section 3.2.12 (Partial Composite Core Conductor Alternative), the existing structures south of the Vincent Substation within the ANF (Segments 6 and 11) and between the Mesa and Chino Substations (Segments 7 and 8) would not be able to support the weight of the composite core conductor that would be needed to provide the required capacity increase to meet the objectives of the TRTP. Consequently, the existing structures within Segments 6, 7, 8, and 11 would need to be replaced to provide sufficient mechanical strength and adequate clearances for ultimate operation at 500 kV. Therefore, the environmental advantages of using composite core conductor associated with the use of existing structures would be eliminated (see Appendix A, Section 3.2.12, for additional details). Therefore, this alternative was eliminated from further consideration in the Draft EIR/EIS.

As described by SCE in Data Request Set TRTP CPUC-ED-07 (Question #19), reconductoring the Antelope-Mesa 220-kV T/L with a HTLS system and continued operation at 220 kV could not realistically increase the capacity by a factor of two as postulated by the Acton Town Council because the existing tower structures cannot support conductor large enough to allow for such an increase (see discussion in the PEA, Section 2.4.2.2, page 2-52). Consequently, a complete tear-down and rebuild would be required to allow for increases of capacity to the levels postulated by the Acton Town Council.

It is important to recognize that the discussion about “how much” specific nameplate capacity increase can be achieved on a reconducted transmission line (a 50% increase, a “factor of two” increase, consideration of the capabilities of existing structures, etc.) does not properly address how much actual increase can be achieved in total system capacity to accommodate up to 4,500 MW of new generation. As discussed above, regardless of the nameplate capacity increase that can be achieved on any individual transmission line with a 220-kV reconductor, such an upgrade would not intrinsically result in greater utilization of the nameplate capacity of that line and therefore would not result in a substantial increase in the “total” transmission system capability. Therefore, the statement that “reconductoring all the line identified in Segments 5, 6, 7, 8 and 11 with an appropriate HTLS conductor will accommodate far more than the 4500 MW” is factually incorrect. Assuming such an upgrade could be implemented to increase individual line nameplate capacity, and assuming such a reconductor would not require widespread replacement of existing transmission structures, this hypothetical upgrade would not “force” 4,500 MW of new generation to flow on these reconducted 220-kV lines for the reasons stated above. In essence, without changing the distribution of power flows, the TRTP project objectives, including increasing system reliability and address South of Lugo transmission constraints would not be met.

As discussed in Data Request Set TRTP ACTON-05 (Question #1, Part H) for Segment 5 (but applies to all segments where 220-kV T/Ls are replaced by 500-kV T/Ls operated at 220 kV), replacing the existing lines would result in new tower infrastructure capable of supporting much larger conductors than are currently supported by the existing transmission
tower infrastructure. As designed, all TRTP lines south of Antelope would be constructed with two-bundles of 2156 ACSR line conductor. As such, these new lines, regardless of the operating voltage (220 kV or 500 kV), would not have the same capacity limitations as today’s Antelope-Mesa 220 kV transmission line.

Furthermore, as presented by SCE in Data Request Set TRTP CPUC-ED-07 (Question #20), the new TRTP 500 kV T/Ls, even though operated at 220 kV, would not be limited by other existing 220-kV transmission elements in a manner that limits the ability of the system as a whole to accommodate up to 4,500 MW of new generation and meet the TRTP Project objectives. As discussed above, increasing the nameplate capacity of any line (in MW) will not by itself result in greater utilization of that line unless there is a resulting decrease in line electrical impedance as well. This is why when reconductoring a line with conductor that has similar mechanical properties to existing conductor in place, electrical impedances will not be significantly reduced, actual power flow utilization of that facility will not significantly increase, and constraints caused by other 220-kV lines in the system will still limit total system capability. In the case of TRTP, however, all 500 kV T/Ls (even those with initial operation at 220 kV) would be constructed with larger conductors in a bundled configuration (2B-2156 ACSR) which would both increase the capacity of these lines and decrease the electrical impedance of these lines relative to the impedances of other existing 220-kV lines in the system. This combination would result in greater utilization of these new transmission lines, less stress on other 220-kV lines in the system, and greater overall total system capability. This allows TRTP, as proposed, to accommodate up to 4,500 MW of new generation even with Rio Hondo-Vincent No. 2 (partial Segment 6) and Mesa-Vincent No. 2 (Segment 11) initially energized at 220 kV.

Generation interconnection studies have determined that with up to 4,500 MW of new generation, the system with TRTP as proposed meets applicable NERC, WECC and CAISO reliability criteria under base case and line outage conditions. Note that the TRTP as proposed involves the operation of the Mira Loma-Vincent T/L (Segments 6, 7 and 8) at 500 kV and the operation of the Rio Hondo-Vincent No. 2 (partial Segment 6) and the Mesa-Vincent No. 2 (Segment 11) at 220 kV. Operation of the Rio Hondo-Vincent No. 2 T/L and the Mesa-Vincent No. 2 T/L at 500 kV is anticipated to be required to accommodate generation interconnection requests beyond 4,500 MW.

The Noise Technical Report was reviewed by Aspen Environmental Group for the CPUC for completeness and adequacy. The data provided in the Noise Technical Report was then independently evaluated and incorporated by reference into the Draft EIR/EIS for analysis of Alternative 2.

The existing ambient corona noise conditions within the City of Acton are based on Draft EIR/EIS Noise Location 5 (South of Vincent), with the existing Scenario modeled with seven 220kV single-circuit LSTs and one 500kV single-circuit LST; six of the lines are energized and two of the lines are idle (de-energized).

Corona noise modeling inputs included 40 total conductors, of which 18 are energized phases, 6 are non-energized (idle) phases, and 16 are ground wires. An elevation of 3,225 feet above msl was used for Location 5 South of Vincent. Draft EIR/EIS Table 3.10-3, has been updated to clarify the number of non-energized lines.
Existing Corona noise for Location 5 (South of Vincent) was modeled from left to right (see Draft EIR/EIS Figure 2.2-56), with the following eight transmission lines:

- Segment 6: First Structure – 220 kV SC LST - energized
- Segment 6: Second Structure – 220 kV SC LST - energized
- Segment 6: Third Structure - 220 kV SC LST - energized
- Segment 11: First Structure – 220 kV SC LST - idle
- Segment 11: Second Structure – 220 kV SC LST - energized
- Segment 11: Third Structure – 220 kV SC LST - idle
- Segment 11: Fourth Structure – 220 kV SC LST - energized
- Segment 11: Fifth Structure - 500 kV SC LST – operated at 220 kV – energized

Draft EIR/EIS Table 3.10-5, shows that operational corona noise for Location 5 of the proposed Project was based on operation of the following eight transmission lines:

- Six 220-kV single-circuit lines on LSTs
- One single-circuit line on tubular steel poles (TSPs), to be built to 500-kV specifications and operated at 220 kV
- One 500-kV single-circuit line on TSPs

The corona modeling inputs included 38 total conductors, of which 24 are energized phases and 14 are ground wires.

Based on the noise model output using these assumptions, it was determined that the increase in operational corona noise generated by the proposed Project along this segment would represent a substantial increase in noise over existing ambient noise conditions. This increase was determined to represent a significant and unavoidable operational noise impact of the proposed Project at Location 5.

For a further explanation of how existing and future corona noise was determined for Alternative 2 Location 5, the City of Acton is referred to SCE Data Request Set TRTP ACTON-01.


Please also see the response to Comment A.16-1 and Draft EIR/EIS Section 1.2, which discusses the project objectives and purpose and need. As discussed in Section 1.2, the Tehachapi Generation queue had a total of 19 projects equaling 4,350 MW as of April 2006. As further discussed in Section 2.9.3, “as energy projects are proposed, completed, or withdrawn, the CAISO queue is constantly changing and regularly updated.” Therefore, the queue has been tracked throughout the course of the EIR/EIS analysis. As of July 25, 2008, the total wind energy proposed for Kern County was 5,973.1 MW. The total has since changed to 4,791.1 MW, as listed in the January 9, 2009, CAISO queue.”

The TRTP upgrades proposed by SCE are required to interconnect 4,500 MW of power from the TWRA, address the reliability needs of the CAISO-controlled grid due to projected load growth in the Antelope Valley, and address the South of Lugo transmission constraints. The purpose and need for TRTP are clearly articulated in Section 1.2. Please also see the
responses to Comments A.16-1 and A.16-2 for discussion of project objectives, purpose and need, and Comment A.16-5 regarding the project infrastructure.

A.16-16 The land use study area for the proposed Project includes lands that fall within one-half mile of both its proposed Right-of-Way and its proposed (new and expanded) substation sites, as identified in Section 3.9.2 (Land Use, Affected Environment). The same one-half mile “buffer” was used to establish the land use study area for the proposed Project’s alternatives. The community of Acton, from Highway 14’s crossing of Crown Valley Road, is an estimated 4.4 miles away from the Vincent Substation and approximately 4.0 miles away from Segment 5. Therefore, the community of Acton does not fall within the Land Use Study Area. Comment A.16-16’s reference to the proposed Project’s location “near” the community of Acton cannot be found within Section 3.9 (Land Use) of the Draft EIR/EIS; the community of Acton is not mentioned in the land use analysis. It is noted, however, that identified existing land uses within one-half mile of Segment 5 from Mile Post 12 to the Vincent Substation include Open Space/Undeveloped, Residential, Agriculture, Industrial, Commercial and Services, and Transportation, Communication and other Utilities (please refer to Figures 3.9-3d and 3.9-3e of the Map and Figure Series Volume and Table 3.9-7 of Draft EIR/EIS Section 3.9 [Land Use]). This portion of Segment 5 and the Vincent Substation are the closest locations of the proposed Project (and its alternatives) to the community of Acton. For a discussion of the impacts associated with the proposed Project and its alternatives please refer to Sections 3.1 through 3.17. The visual simulations for KOP-North-12, and -13 (Figures 3.14-14b, and 3.14-15b, respectively, of the Map and Figure Series Volume) provide renderings of the proposed Project in the vicinity of Segment 5 and the Vincent Substation, the closest locations to Acton. The Visual Resources analysis concludes that impacts in this area would be adverse but can be reduced with mitigation.

A.16-17 Various local (city and county) jurisdictions define “Open Space” or “Open Space/Undeveloped” differently. Existing land uses identified in Section 3.9 (Land Use) were based on the Southern California Association of Government’s (SCAG’s) existing land use mapping and classification scheme to ensure consistency between all jurisdictions crossed by the proposed Project Right-Of-Way. Table 3.9.2 (Existing Land Use Classification Scheme) defines “Open Space/Undeveloped” as lands that are “vacant/undifferentiated, abandon orchards and vineyards, vacant land with limited improvements, and beaches (vacant).” The definition does not state or imply that Open Space/Undeveloped lands are lands that are to be permanently set aside for environmental conservation, historical and cultural resource preservation, or recreation. As discussed in Final EIR Section 3.9.3.2 (Applicable Laws, Regulations, and Standards: State [Land Use]), under the CPUC’s General Order Number 131-D, Section XIVB, the CPUC has preemptive jurisdiction over the construction, design, and operation of public utilities within the State, and no local land use permits or local land use plan or zoning consistency evaluations are required for the proposed Project and its alternatives. However, a Policy Consistency and Plan Amendments Report has been prepared for the proposed Project and its alternatives, and no inconsistencies with the Los Angeles General Plan were identified. The General Plan land use designations along Segment 5 from Mile Post 12 to the Vincent Substation include Open Not Developable, Agriculture and Transportation (as provided in Figures 3.9-4d and 3.9-4e of the Map and Figure Series Volume and Table 3.9-7 of Draft EIR/EIS Section 3.9 (Land Use). The community of
Acton’s concerns related to zoning will be shared with, and considered by, decision makers. Please refer to Sections 3.1 through 3.17 for discussions of the resource-specific impacts associated with the proposed Project and its alternatives.

A.16-18 As discussed in Chaparral Greens v. City of Chula Vista (1996) 50 Cal.App.4th 1134, CEQA does not require discussion of consistency with draft plans. Nevertheless, Mitigation Measure T-8 has been revised in the Final EIS to include a requirement for the Project Applicant to coordinate with the California Department of Transportation (District 6, District 7, and District 8), the Los Angeles County Metropolitan Transit Authority, and the traffic departments or public works departments of the counties of Kern, Los Angeles, and San Bernardino and the numerous cities through which the proposed transmission route traverses to ensure that Project structures are appropriately placed to avoid conflict with any planned transportation projects. Therefore, the proposed Project would be designed to avoid any conflicts with any potential transportation land uses along the proposed Project route.

A.16-19 As discussed in the response to Comment A.16-1, the Draft EIR/EIS discloses the project objectives and the purpose and need in Section 1.2. The TRTP upgrades proposed by SCE are required to interconnect 4,500 MW of power from the TWRA, address the reliability needs of the CAISO-controlled grid due to projected load growth in the Antelope Valley, and address the South of Lugo transmission constraints. As discussed in Section 1.2 (Purpose and Need) of the Draft EIR/EIS, the Lead Agencies completed an independent assessment of the purpose and need for the TRTP. Based upon the information reviewed, it was determined that there was ample support to justify the need for the TRTP and that sufficient generation will be sited in the TWRA to justify the network upgrades proposed.

The project objectives were appropriately used in screening for potential alternatives. This screening methodology is discussed in General Response GR-1 and analyzed in Appendix A of the Draft EIR/EIS. A total of 31 potential alternatives to SCE’s proposed Project were initially considered for evaluation in the Draft EIR/EIS, of which seven were carried forward for detailed analysis in the Draft EIR/EIS, including the No Project/Action Alternative. These alternatives provide a reasonable range of alternatives and permit the decision makers to make a reasoned choice (See Village Laguna of Laguna Beach, Inc. v. Board of Supervisors of Orange County (1982) 134 Cal.App.3d 1022). Furthermore, the Draft EIR/EIS analyzes impacts of the proposed Project and the alternatives as required by NEPA.

A.16-20 The Draft EIR/EIS contains certain information taken directly from the PEA, including information describing the proposed Project. However, the Draft EIR/EIS contains substantial additional information about existing conditions and environmental impacts, and proposes a substantial amount of additional mitigation. The Draft EIR/EIS also reaches many differing impact conclusions than the PEA, including conclusions that the Project would have more significant effects than identified in the PEA. The Draft EIR/EIS represents the independent judgment of the Lead Agencies.

Commenter suggests that alternatives should have been provided for every segment of the Project. As discussed in response to Comment A.16-12, analysis of alternatives for every segment of the Project is not required. (See Big Rock Mesas Prop. Owners Ass’n v. Board of Supervisors (1977) 73 Cal.App.3d 218, 277; see also No Oil, Inc. v. City of Los Angeles (1987) 196 Cal.App.3d 223, 235) and the Forty Most Asked Questions Concerning CEQ’s
National Environmental Policy Act Regulations (CEQ 1981). What is required is the analysis of a reasonable range of alternatives, which has been provided in the Draft EIR/EIS.

The No Project/No Action Alternative (Alternative 1) has been analyzed throughout the Draft EIR/EIS. The decision to approve, approve with modifications, or disapprove the proposed Project or one of the alternatives will be made by the federal decision makers at the Forest Service. The Final EIR was approved by the CPUC.

The installation of residential solar systems does not accomplish the objective to transmit wind energy from the Tehachapi Wind Resource Area, which is the largest wind resource area in the State. The addition of residential solar systems also does not accomplish either of the Project’s other two stated objectives. Residential solar systems may or may not be less expensive than the proposed Project, but that is not an appropriate subject for the Draft EIR/EIS, but rather is a subject for decision-makers to consider. The Draft EIR/EIS document presents environmental information about a project and alternatives, but does not provide cost-benefit analysis or make policy recommendations.

Regarding the Commission’s obligation under CEQA to complete an independent analysis of SCE’s proposed TRTP project, please see response to Comment A.16-19.

A.16-21 Socioeconomic effects are discussed in Section 3.12. NEPA does not require an EIS to perform a monetary cost-benefit analysis (See Draft EIR/EIS Section 3.12.3 and 40 CFR §1502.23 and 1508.14). Project costs and determinations as to whether such costs are warranted is matter that will be considered by the federal decision-makers in their review of the Project.

A.16-22 The risk of terrorist attacks is not considered likely with or without the Project. As discussed in Section 5.3.2 of the Draft EIR/EIS:

“By nature the purpose of terrorism is to create and promote fear among populations, as well as (and through) death, destruction, and disruption of a targeted population’s or facility’s ability to effectively carry out its intended function and/or to eliminate or limit peaceful living and commerce. While the possibility of a terrorist attack on the proposed TRTP exists, the proposed Project is not considered to be a high level or likely target for attack, because consequences of a potential attack while serious and adverse would not result in catastrophic consequences to the regional electric grid. Any human injury or death resulting from a terrorist attack would be serious, tragic, and difficult to prevent; however, the overall risk of an attack on the proposed TRTP is not considered likely.”

Furthermore, electric transmission and substation systems are planned to address potential contingencies such as loss of a transmission line or a substation. In planning for facilities and operation of the electric system, this is identified as an N-1 condition, whereby the power system will continue to operate and serve load even though one element has been lost due to a contingency occurring. The contingency could be due to any number of reasons such as equipment failure, taking a facility out of service for maintenance, or damage due to terrorism.

As stated in Section 1.2, the objectives of the Project include addressing the reliability needs of the CAISO-controlled grid and addressing the South of Lugo transmission constraints. As
such, the Project would increase overall system reliability and consequently decrease the risk of an electrical outage resulting from a terrorist attack. Based on the reasons discussed in Section 5.3.2, the overall risk of an attack on the proposed TRTP is not considered likely.

Power generated in the TWRA would flow to the areas of electrical demand. Between the TWRA and Vincent Substation, power distribution could occur at the Windhub, Cottonwind, Whirlwind, and Antelope Substations (including use of the new Antelope-Pardee T/L being built as part of Segment 1) prior to reaching the Vincent Substation. Much of the power would likely flow through the Vincent Substation and then south to the load centers in Los Angeles. However, the change in the capacity of electricity flowing through Vincent Substation does not change the conclusions of the Final EIS, as the system is designed to allow for alternate electrical paths (see N-1 condition discussion above).

A.16-23 Please see the response to Comment A.16-22, above.

A.16-24 Please see Final EIR Section 3.16.6.26.1, Impact F-2. As discussed under Impact F-2 “because there are existing transmission lines in the shared ROW, aerial firefighting crews avoid making drops near the ROW under existing conditions, and the addition of the proposed Project would present only a marginal increase in the required altitude of aerial vehicles working through the shared ROW.” Segment 11 in the community of Acton would increase the maximum height of structures in the existing shared ROW by approximately 50 to 100 feet (see Figure 2.2-56). Segments 5 and 6 through the community of Acton would not increase the maximum height of structures in the shared ROW (see Figures 2.2-9 and 2.2-18). Aerial firefighters are required to maintain at least 150 feet of clearance from transmission structures, and aerial crews routinely avoid making drops of water and retardant in existing transmission ROWs due to the twin risks of electrocution and causing damage to the transmission infrastructure. Therefore, due to the presence of the existing transmission structures, the proposed Project’s maximum height increase of 50 to 100 feet through the community of Acton will not significantly change the existing baseline conditions Segment 11. The baseline conditions with respect to the maximum height of transmission structures for Segments 5 and 6 through the community of Acton would be unchanged. No change to the analysis of Impact F-2 has been made. The community of Acton does not contain federal lands, and is therefore not under the jurisdiction of the Forest Service. The CPUC has already made a decision on the project in this area.

A.16-25 Thank you for your comments. They will be considered by the federal decision-makers in their review of the Project. Please see the responses to Comments A.16-1 through A.16-9 regarding the Project objectives and the proposed Project design. The assessment of wildfire impact to the community of Acton is not discussed further here, as Acton does not contain federal lands, and is therefore not under the jurisdiction of the Forest Service. The CPUC has already made a decision on the project in this area.
Comment Set A.17: Watershed Conservation Authority

Watershed Conservation Authority

April 6, 2009

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Re: Comments on Draft Environmental Impact Report (DEIR)/Impact Statement (IS): Tehachapi Renewable Transmission Project

Dear Mr. Boccio and Mr. Seastrand:

The Watershed Conservation Authority (WCA) appreciates the opportunity to comment on the Draft Environmental Impact Report/Impact Statement (DEIR/IS) for the Tehachapi Renewable Transmission Project. Please include in its entirety our letter dated September 28, 2007, that was previously submitted and is attached as part of the WCA comments on the DEIR/IS. As indicated in the September 28, 2007, letter the WCA is a joint powers agency of the San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy and the Los Angeles County Flood Control District. The WCA undertakes projects to preserve urban open space and habitats in order to provide for low-impact recreation and educational uses, wildlife and habitat restoration and protection and watershed improvements.

The jurisdiction of the WCA includes the San Gabriel River and its tributaries, the lower Los Angeles River and its tributaries, and the San Gabriel Mountains, Puente Hills, and San Jose Hills. The proposed Tehachapi Renewable Transmission Project (TRTP) transects a significant portion of WCA's jurisdiction and will impact our mission of protecting resources, and providing opportunities for the enjoyment of open space and trails for community use. Therefore, the comments in this letter address both the broad interests of the WCA in addressing the impacts of the TRTP to our
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general mission and the specific impacts to the Duck Farm project site owned by the WCA.

Therefore, while the WCA supports the need to develop renewable energy opportunities we take seriously the mandate, as stipulated in Executive Order 13212, that it be done in such as manner to maintain environmental protections. While there are certainly alternatives and mitigation measures identified in the DEIR/EIS that address some of these issues there remain several areas specified below that must be addressed further. In general however, the WCA supports the proposed project only if Alternatives 6 and 7 are approved in the final EIR/EIS. We also appreciate the time taken by representatives of the CPUC, Aspen Environmental and Southern California Edison to address our concerns through both formal meetings and telephone conversations.

Project Description & Alternatives

The TRTP proposed project (Alternative 2) would involve the construction, operation and maintenance of new and upgraded transmission infrastructure along 173 miles of new and existing rights-of-way in southern Kern County, portions of Los Angeles County and San Bernardino County.

In section 2.7.3 Alternative 7 Operations and Maintenance "...underground components prohibit the placement of permanent structures above or below the underground ducts and vaults. Permanent structures include, but not limited to, trees, water ponds, buildings, beautification and decorative hills, rocks and etc." Ongoing coordination between the Watershed Conservation Authority (WCA) and SCE will be required for the detailed coordination of the design for the TRTP within the Duck Farm.

Project Construction

For the planning purpose of the proposed Duck Farm project, an advance notice of one year for project construction schedule is needed for coordination with the proposed Duck Farm project construction.

Identification of staging, pulling and/or access locations were not clearly identified in relation to Segment 7, and specifically, the Duck Farm. These locations could have a potentially significant impact.

Environmental Analysis

3.2 Agricultural Resources

See comments regarding local agricultural uses in Section 3.9 Land Use comments.
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3.3 Air Quality

Air quality impact AQ-3: “Construction of the Proposed Project would expose sensitive receptors to substantial pollutant concentrations.” This impact applies to all park and recreational areas such as the San Gabriel River and LARIO Bike trails both of which are in close proximity to Segments 7 and 11 of the Project. Mitigation measures should also include scheduling construction during off-peak times of park use, to avoid the effects of air pollutants on park and trail users. The following specific mitigation measure should be enhanced as follows:

AQ1c: Construction worker carpooling will be incentivized ....

AQ1g: Restrict idling for all vehicles to five minutes.

AQ1h: Obtain from the Angeles National Forest, Los Angeles County Parks information on peak recreational use and/or conduct a survey to fix specific as appropriate off peak hours for deliveries to either 6:00 – 9:30 am OR 3:30 to 6:30 pm to reduce impacts to sensitive receptors.

AQ-6 Offset Mitigation: If emission reduction credits are obtained for this project it is highly recommended that one of credits should be a specific study of the impacts of air pollution on sensitive species of the Project area.

3.5 Cultural Resources

The designated as the National Park Service’s recreational historic route of Juan Bautista De Anza should be considered an important historic and cultural resource for the area. The potential impacts to this trail were not considered in the DEIR, despite the fact that construction activities along this road will impact the trail significantly and the permanent visual impact of the additional power lines along this trail will diminish its overall value. Another specific language change is as follows:

C-1b: ...Results of these inventories shall also be filed with all affected local governments, landowners and the ..... Site specific field surveys will be coordinated with landowners and undertaken....

Alternative 7: For the record the Watershed Conservation Authority had adopted a mitigated negative declaration for the Duck Farm which included the following:

Mitigation Measure CUL-1. The exterior rehabilitation of the Farm House shall adhere to the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring
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and Reconstructing Historic Buildings. The exterior rehabilitation shall be conducted under the general direction of a qualified historic architect. In addition, the Farm House Visitor and Interpretive Center shall include interpretive displays describing the historic use of the site as a duck farm.

3.6 Environmental Contamination Hazards

3.6.11 Soil/Groundwater contamination – refers back to Alternative 2: 3.6.6.1 – Impact E-2 Excavation or grading could result in mobilization of existing soil or groundwater contamination from know sites.

The stated Phase 1 ESA under APM HAZ-1 should include examination of records for the Duck Farm.

Impact E-4: Unanticipated preexisting soil and/or groundwater contamination could be encountered during excavation or grading. This measure states it does not include requirements for documentation and reporting of encountered contaminants. For the Duck Farm, such reporting should be added to this measure and to the SCE Soil Management Plan under APM-HAZ-3. Reporting shall be submitted to the Watershed Conservation Authority.

3.8 Hydrology & Water Quality

Alternative 2 (proposed project) includes two proposals for the double-circuit 66-KV transmission towers in Segment 7, either relocation of 45 existing towers to the edge of the SCE right of way between Mile Post 4.4 and 15.8 or under grounding of the transmission lines of these same towers for the same 11.4 miles. Since this stretch of Segment 7 runs immediately parallel to the San Gabriel River from the City of Irwindale southerly through the Whittier Narrows Dam Recreation Area and because the relocation of the towers to the edge of the right of way would increase the area with restricted use around the SCE ROW, we recommend that the transmission lines be placed underground rather than the towers relocated. This would minimize impacts to the proposed and ongoing San Gabriel River Master Plan projects in this area.

3.9 Land Use

Land use designations shown in the document maps are SCAG only. This section refers to Section 3.2.2 for Agricultural Land Use details. Zoning by local agencies (i.e., County, cities) need to be incorporated and considered.

Section 3.2.2 Agricultural Land Use: Some parts of the Duck Farm are locally zoned either heavy or light agricultural use with such uses in existence, including land uses designated
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Agricultural in Table 3.9-2 on page 3.9-5. Table 3.9-12 does identify agricultural land use in the segment at the Duck Farm. Agricultural uses identified in this table includes Nurseries – Commercial and Retail. There is a commercial nursery at the Duck Farm within the locally zoned agricultural use. Impacts to these current agricultural uses by the TRTP will be potentially significant to the nursery, and need to be addressed and mitigated in Alternatives 2 and 7.

Table 3.9-15 Summary of staging/wire setup sites: Segment 7 – unable to find proposed locations of the ~16 wire setup sites and 1 staging area.

Alternative 2 Proposed Project:

Mitigation Measures for Impact L-1 (displace/preclude residential land uses)
L-1a & L-18 Construction Liaison with Property owners & Advance notice of construction for Property Owners: 14 days notice is unacceptable. 1 year notice requested. (WCA is a residential property owner).

Mitigation Measures for Impact L-2 (displace/preclude non-residential land uses)
L-2a Construction Plan Provisions – Non Residential Property owners: Planning and coordination with property owners should occur prior to finalization of the access routes and areas of construction. 1 year notice prior to actual construction is requested.

Mitigation Measures for Impact L-4 (O&M would cause long-term disruption of existing & planned non-residential land uses):
L-4 Consult with federal, State & local agencies: consult and coordination with all agencies, including the WCA is essential.

Mitigation Measures for Impact L-5 (Conflict with any applicable...local land use plans, goals or policies – according to Appendix G of CEQA Guidelines):
L-5 requires evaluation of relevant plans, goals, policies. Table 3.9-20 Consistency with Applicable Land Use Plans & Policies. This table states that Segment 7 is consistent. Consideration of agricultural zoning and mitigation of impacts should be included, as it was not considered in the DEIR.

3.9 Alternative 7: see above comments for Alternative 2 Proposed Project

3.10 Noise

The project may have a substantial adverse impact on the proposed Duck Farm's facilities and recreation services. The corona noise created by transmission towers operations may
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disturb not only the Duck Farm users, but also wildlife. It will negatively impact the proposed Duck Farm which offers the public opportunities for bird watching, picnicking, and other recreational activities. Wildlife, including nesting birds, may be disturbed by the corona noise. On page 3.10-32, it is stated that the increase in operational corona noise generated by the proposed project along Segment 7 would substantially increase existing ambient noise conditions from range 22 dBA to 25 dBA to range 51 dBA to 54 dBA. Also on page 3.10-56, Alternative 7 would result in no permanent operational corona noise impacts along the 66-kV sub-transmission routes. Therefore, it is recommended that SCE implements Alternative 7 to reduce the noise impact on the Duck Farm project area.

3.11 Public Services and Utilities

No comment

3.12 Socioeconomics (proposed project Alternative 2 and Alternative 7)

Impact S-2 Construction activities would cause a temporary decrease in revenues for agricultural land owners; AND Impact S-3 Project activities would affect public agency revenue (beneficially)

Because the Duck Farm is owned by a public agency, the WCA, and because activities within the Duck Farm include the agricultural use of a commercial nursery, both of these items would adversely impact the Duck Farm, cumulatively. The mitigation measures for these impacts must include the Duck Farm. The Duck Farm is not addressed in this section. Only the North Region is addressed for agricultural impacts.

3.13 Traffic and Transportation

Coordination of the route in Segment 7 should consider local and regional bikeway and multiuse trail plans to ensure compatibility with plans in place for future trails. This would include City of Baldwin Park, the Emerald Necklace, Duck Farm and Whittier Narrows.

3.14 Visual Resources

The project will substantially degrade visual quality throughout the project area. This section does not recognize the efforts being made by various public and private non-profit agencies to develop the Emerald Necklace (including the SG River Corridor Master Plan area) which will provide visual enhancements in addition to recreational, habitat and watershed improvements. The Duck Farm project area is one of the many jewels along the river parkway. The much taller transmission towers and the increased number of transmission lines are unavoidable visual impacts. The visual impacts can be
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substantially decreased with the implementation of Alternative 7, undergounding the transmission lines and towers within the proposed Duck Farm project site and at Whittier Narrows,

It is strongly recommended that this action is also taken in Section 7 from mile post 4.4 to 15.8. Since this stretch of Segment 7 runs immediately parallel to the San Gabriel River from the City of Irwindale southerly through the Whittier Narrows Dam Recreation Area and because the relocation of the towers to the edge of the right of way could increase the area with restricted use around the SCE right of way, we recommend that the transmission lines be placed underground rather than the towers relocated. This would minimize impacts to proposed and ongoing Emerald Necklace and San Gabriel River Corridor Master Plan projects in the area.

3.15 Wilderness and Recreation

Baseline Data Collection Methodology for the Southern Region should include the proposed San Gabriel Watershed and Mountains Special Resource Study, the National Park Services is developing a range of preliminary approaches/management concepts for consideration in the San Gabriel Watershed and Mountains SRS that would protect significant resources and open space and provide additional recreational opportunities for the region. Designations from this study would significantly affect any special use permits SCE obtains from the FS.

“For the purposes of this analysis, the wilderness and recreation Study Area has been defined as the area within one-half mile of the proposed Project route and alternatives, as well as the area within one-half mile of all new and expanded substation sites and other Project components, including helicopter staging areas and construction access roads. Additional wilderness and recreation resources which are outside of the one-mile radius but which have national, regional, or local significance are also included in this analysis. This is an appropriate Study Area for wilderness and recreation because it captures all resources that contribute to baseline conditions and could potentially be affected by Project activities.”

Figure 3.15-4 is not inclusive of all the recreational resources within the Wilderness Study Area several parks are missing visit the Green Visions GIS Planning Tools for information on documenting all the parks within the study area http://gv-server.usc.edu/GVWebTools_public_v2/viewer4.16/signIn.asp.

Section 6 Development of the Tehachapi Wind Resource Area is not sufficiently developed, further the specialist studies are incomplete therefore at this time the RMC cannot fully analyze the impacts of this project on the RMC territory.

The Mitigation Measures and Monitoring Program for all sections do not include funding or an implementation program. Funding for this program is required to successfully implement the Mitigation Measures and Monitoring Program.
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Thank you for the opportunity to review this document and provide comments. Please feel free to contact our staff biologist, Luz Torres or Valorie Shatynski, Duck Farm project manager for further information. We are available to meet with staff and/or your consultant to review our recommendations further.

Sincerely,

[Signature]
Belinda V. Faustinos
Executive Officer

cc: WCA Board Members
Response to Comment Set A.17: Watershed Conservation Authority

A.17-1 Thank you for reviewing the Draft EIR/EIS and for your comments. Your September 2007 letter is already included in the record. A copy is included in the Scoping Report for the Draft EIR/EIS.

A.17-2 Thank you for the explanation of your agency’s jurisdiction and mission.

A.17-3 Thank you for expressing your agency’s preference for alternatives. Your comments will be shared with federal decision-makers who are reviewing the Project.

A.17-4 The Forest Service supports coordination between the WCA and SCE regarding the Duck Farm project. The WCA and SCE should coordinate directly on design and construction issues.

A.17-5 As indicated above, the Forest Service supports coordination between the WCA and SCE. Your request for advance notice of the TRTP construction schedule will be provided to SCE. Preliminary locations for staging areas, wire setup sites, and access roads have been identified by SCE and were considered in the impact analysis in the Draft EIR/EIS. These types of project design details are subject to change and will be finalized as part of the final engineering process.

A.17-6 SCAQMD’s recommended application of localized significance thresholds does include parks as receptors, but park users are not equivalent to other sensitive receptors like hospitals. In general, exposures would generally not occur for long periods of time, such as on bike paths where a cyclist would go through the construction equipment downwind exhaust plume within a few seconds. Also, unlike more fixed locations such as schools, hospitals, or even residences, exposures in recreational areas can often be avoided by moving to another area of the park.

Edits to the air quality impact AQ-3 have been made in the Final EIS to note that receptors in parks and recreation areas within certain distances from construction work areas may have adverse impacts. However, no additional air quality mitigation, for recreational areas, beyond that recommended for the Project as a whole is considered necessary. Specifically:

a) For AQ-1c, the word incentivized is not considered a major improvement over the word encouraged.

b) For AQ-1g, it is not practical to restrict vehicle idling for vehicles not directly under the control of the project (i.e., personal vehicles), and gasoline engine idling would be less frequent and has much lower health impacts than diesel engine idling.

c) For AQ-1h, the measure restricts trips from 6:00 to 9:30 a.m. and 3:30 to 6:30 p.m. as these are peak traffic times, changing this measure would have an overall negative impact to air quality.

d) For AQ-6, the offset mitigation is in the form of banked emission credits as necessary to meet federal General Conformity requirements. Other mitigation does not apply to meeting this federal statutory requirement.

A.17-7 The Schabarum trail or “Juan Bautista De Anza National Historic Trail Recreation Route” is a bicycle trail and recreation route that roughly parallels Segment 8. According to mapping provided by the National Park Service (http://www.nps.gov/juba/), the recreation route is only related to the historic route by name and is not the actual Juan Bautista de Anza trail.
which is located between 3 and 8 miles to the south. Thus, the Schabarum Trail is not considered an important historical or cultural resource.

In the TRTP area, NPS depicts the Anza Trail as a corridor slightly more than one mile wide. The corridor intersects the TRTP in two locations: it crosses Segment 7 between M33-T4 and M35-T1 and Segment 11 between M38-T1 and M39-T3. However, there is no data to indicate where the actual trail was located, and since the area currently has intensive urban development the integrity of historical context, feeling, and association has been lost.

A.17-8 Thank you for your comment. The Lead Agencies acknowledge the mitigation measure adopted by the Watershed Conservation Authority. As noted in Table 3.5-11, the Duck Farm is located along the proposed 66-kV Underground Element of Alternative 7. It is not anticipated that significant qualities of the Farm House will be affected adversely if this alternative is selected for implementation.

A.17-9 The Duck Farm was not identified in the environmental database search by EDR and does not appear to be a known contaminated site with agency oversight for monitoring or cleanup. Review of the Duck Farm Project Final IS/MND (July 2007) does not reveal that this site is currently under the oversight of an environmental agency. Further, the IS/MND indicates that very low levels of soil contamination detected in soil gas samples were not confirmed by soil testing, and that site development for the Duck Farm is unlikely to encounter contaminated soil to depths of 11 feet. [Underground construction for subtransmission lines will be less than 11 feet]. In addition, minor hydrocarbon/diesel contamination of soil at the above ground storage tank and diesel drum storage area was removed. Due to these site conditions and lack of database assignment, a Phase I ESA for the proposed Project in this area is not required.

Regarding notification of the Watershed Conservation Authority in the event of encountering unanticipated pre-existing contamination, APM-Haz 3 does require notification of the local CUPA agency in such a case; WCA should be able to coordinate notification through the CUPA agency. Further, WCA could develop these requirements with SCE as part of right of entry agreements prior to construction. These arrangements are outside the scope of the EIS.

A.17-10 To clarify, the undergrounding of 66-kV subtransmission lines is proposed under Alternative 7. As summarized in Table 2.2-1 (Summary of Alternative 2 Components), Alternative 2 (proposed Project) would include the relocation of several existing 66-kV subtransmission lines between the existing Rio Hondo Substation and the existing Mesa Substation, within the existing utility corridor, as well as erecting approximately 150 new double-circuit 66-kV subtransmission Light Weight Steel Poles (LWSPs) and TSPs. In comparison, as described in Section 2.7, Alternative 7 is comprised of three 66-kV subtransmission line elements, including the following: (1) Undergrounding the existing 66-kV subtransmission line in Segment 7 between Valley Boulevard (S7 MP 8.9) and S7 MP 9.9; (2) Re-routing and undergrounding the existing 66-kV subtransmission line around the Whittier Narrows Recreation area in Segment 7 (S7 MP 11.4 to 12.025); and (3) Re-routing the existing 66-kV subtransmission line around the Whittier Narrows Recreation Area in Segment 8A between the San Gabriel Junction (S8A MP 2.2) and S8A MP 3.8.

Thank you for your concerns and suggestions regarding placing the subtransmission lines underground along Segment 7 to minimize impacts to the San Gabriel River Master Plan projects. Your comments will be shared with the federal Lead Agency and may be considered in making a decision on the Project.
As addressed in Draft EIR/EIS Section 3.9.1 (Land Use, Affected Environment), due to the geographic breadth of the proposed Project, the consolidated General Plan land use designations of the Southern California Association of Governments (SCAG) was used to ensure a consistent classification scheme across all of the various jurisdictions affected by its implementation. Under the CPUC’s General Order Number 131-D, Section XIVB, the CPUC has preemptive jurisdiction over the construction, maintenance and operation of public utilities within the State and, as such, approvals from local agencies are not required. Please note, however, that a Policy Consistency and Plan Amendments Report has been prepared for the proposed Project and its alternatives and no inconsistencies with any local land use plans were identified. Additionally, Mitigation Measure L-4 (Consult with federal, State, and local agencies) would require SCE to consult with local agencies to ensure that, to the extent feasible, any conflicts with local zoning and General Plan land use designations are minimized.

Impacts to the commercial nursery at the Duck Farm are addressed in the Draft EIR/EIS. As outlined in Draft EIR/EIS Section 3.2.4.2 (Agricultural Resources, through Applicant-Proposed Measures [APMs]), in addition to the mitigation measures recommended in the Draft EIR/EIS, SCE has committed to:

1. APM AG-1 (Coordinate with Landowner - Prior to construction and as a part of acquisition of new easements on agricultural lands, SCE would coordinate with agricultural landowners and identify feasible site-specific measures to minimize impacts to ongoing agricultural operations, including, but not limited to, financial consideration for crop loss. General measures that would be implemented to the extent feasible are detailed below [in APM AG-2 and AG-3]);
2. APM AG-2 (Locate Project Activities to Minimize Impacts to Active Agricultural Operations - For example, to the extent practical, SCE would: [a] locate new towers adjacent to existing towers in order to consolidate obstructions to the movement of agricultural machinery; [b] locate access roads, spur roads, staging areas, and pulling/splicing locations in areas that minimize impacts to agricultural operation; and, [c] minimize removal of perennial crops); and,
3. APM AG-3 (Avoid Harvest Season - To the extent feasible, construction in agricultural fields would be scheduled after the end of harvest season. With implementation of the APMs listed above, and in conjunction with Draft EIR/EIS Mitigation Measures AG-1 (Coordinate construction activities with agricultural landowners) and L-2a (Construction plan provisions – Non-residential property owners), impacts to local agricultural uses, including nurseries within and adjacent to the proposed Project right-of-way or one of its routing alternatives would be minimized.

Overall descriptions of the proposed Project’s marshalling yards and pulling/splicing areas are provided in Draft EIR/EIS Sections 2.2.12.2 (Staging and Support Areas) and 2.2.12.7 (Pulling and Splicing Locations) and their supporting tables. Although the precise locations of these project components were not detailed in the Draft EIR/EIS, preliminary locations of these types of construction areas were provided in SCE’s “Road Stories,” and acknowledged and used for the Draft EIR/EIS impact analyses.

The timing and mechanisms for noticing as required by Mitigation Measures L-1a, L-1b and L-2a is considered appropriate for the nature of pre-construction and construction-phase activities, as addressed in the response to Comment A.23-100.

The effects of noise on wildlife are addressed in Draft EIR/EIS Section 3.4 (Biological Resources), Impacts B-4, B-5 B-6, B-9, B-10, B-14, B-15, B-16, B-18, B-29, B-30, B-31, B-33, B-36, B-37, B-38, B-41. As indicated in Section 3.10 (Noise), operational corona noise
impacts associated with Alternative 2 will result in significant unavoidable impacts to the ambient noise levels in Segment 7 (including the Duck Farm). This significant unavoidable impact required a statement of overriding considerations by the CPUC in selecting Alternative 2. Your support of Alternative 7 was noted and shared with decision-makers at the CPUC.

For the purposes of the Final EIS and by reference, the Final EIR, “agricultural land/resources” are defined in Section 3.2 (Agricultural Resources) in accordance with the California Department of Conservation’s (DOC) Farmland Mapping and Monitoring Program (FMMP), which applies the Natural Resources Conservation Service’s (NRCS) soil classifications to ten-acre mapping units in order to identify lands under the following categories: Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Grazing Land, and agricultural land under Williamson Act Contract. To clarify, the discussion of agricultural lands/resources presented in Section 3.2 is not limited to the North Region, but rather to the NRCS classification system mentioned above; this classification system is described in further detail in Section 3.2 of the Final EIR. The nursery area planned to be included as part of the Duck Farm Project is not considered “agricultural lands/resources”, and is therefore not subject to the impact discussion provided in Section 3.12 (Socioeconomics), with regards to Impact S-2 (Construction activities would cause a temporary decrease in revenues for agricultural land owners).

With regard to Impact S-3 (Project activities would affect public agency revenue), presented in Section 3.12, potential effects of the proposed TRTP on public agency revenue are assessed with consideration of fee- and tax-based revenues, including Adventure Pass sales for visitation of the Angeles National Forest, and property tax payments made to local agencies. At the time of this analysis, construction of the Duck Farm Project was not underway, and a Conceptual Site Plan had only been developed for Phase 1 of the overall Duck Farm Project. As such, it was not possible to characterize potential revenues to the WCA that may result from full development of the Duck Farm Project and that may also have the potential to be affected by the proposed TRTP.

Potential impacts of the proposed TRTP on the Duck Farm Project are addressed in Section 3.5 (Wilderness and Recreation), and relevant mitigation measures have been introduced to reduce significance of potential impacts, as applicable. As indicated in Table 3.15-31 (Wilderness and Recreation Impacts Applicable to Resources in the South Region) it has been determined that the following impacts would be applicable to the planned Duck Farm Project: Impact R-1 (Construction activities would restrict access to or disrupt activities within established recreational areas); and Impact R-2 (Operation and maintenance activities would restrict access to or disrupt activities within established recreational areas). Mitigation Measure R-1a (Coordinate construction schedule with managing officer’s for affected recreation areas), which is also identified in Section 3.15, would require SCE to coordinate with WCA in order to avoid and/or minimize impacts to the Duck Farm Project area.

The compatibility of the route in Segment 7 was considered in Draft EIR/EIS Section 3.9, Land Use. Proposed infrastructure for Segment 7 would be constructed within SCE’s existing right-of-way (ROW). Any entity planning improvements within the existing ROW would need to coordinate with SCE to ensure such improvements would not conflict with use of the ROW for electrical transmission.

Section 3.14.11 of the Draft EIR/EIS acknowledges the beneficial visual effects of placing certain portions of Segments 7 and 8A underground or re-routed overhead. In fact, for Alternative 7, the text for Impact V-3 (For a landscape with an existing transmission line,
increased structure size and new materials would result in adverse visual effects) states: “Additionally, removal of existing overhead subtransmission lines in Alternative 7 would improve the visual environment and viewsheds of the Duck Farm and Whittier Narrows and would create a beneficial effect.”

The Draft EIS/EIR considered a reasonable range of alternatives that best accomplish the project objectives while minimizing the impacts to the environment. It is not feasible to consider every possible permutation of each alternative and NEPA does not require this. (CEQ Forty Questions, No. 1b). Placing Segment 7 underground from MP 4.4 to 15.8 was not considered in the alternative analysis. Please the Alternatives Screening Report in Appendix A of the Draft EIR/EIS.

A.17-16 Thank you for your comments regarding the Baseline Data Collection Methodology utilized for the Wilderness and Recreation analysis presented in Section 3.15 of the Draft EIR/EIS. A complete list of recreational resources within the Project Study Area is provided collectively in the following tables, which are presented in Section 3.15.2.2 for the proposed Project: Table 3.15-11 (North Region Recreational Resources within One-Half Mile of Alternative 2); Table 3.15-14a (Developed Recreation Resources within One-Half Mile of Alternative 2 in the Central Region); Table 3.15-14b (Dispersed Recreation Opportunities within One-Half Mile of Alternative 2 in the Central Region); and Table 3.15-17 (South Region Recreational Resources within One-Half Mile of Alternative 2). In addition, the following tables identify recreational resources within the study area for the Alternative 4 routing options in the South Region: Table 3.15-18 (Recreational Resources within One-Half Mile of Alternative 4, Route A); Table 3.15-19 (Recreational Resources within One-Half Mile of Alternative 4, Route B); Table 3.15-20 (Recreational Resources within One-Half Mile of Alternative 4, Route C); and Table 3.15-21 (Recreational Resources within One-Half Mile of Alternative 4, Route D). The aforementioned tables and associated discussions included in Section 3.15 of the Draft EIR/EIS are inclusive of all recreational resources within the Study Area, with reference to the Final EIR for those areas outside federal lands.

The Specialist Reports noted by the commenter are technical documents prepared for specific environmental issue areas which required more technical analysis than others. As described in Section 1.5.1 (Incorporation by Reference) of the Draft EIR/EIS, the Specialist Reports include detailed technical environmental analyses; due to the nature of certain resource/issue areas that are less technical than others, Specialist Reports were not required for all sections. As such, Specialist Reports were prepared for the following resource/issue areas: Air Quality; Biological Resources (including noxious weed and avian risk analyses); Cultural Resources; Geology, Soils, and Paleontology; Hydrology and Water Quality; Visual Resources. These Specialist Reports are available for review upon request, as well as at the following locations: Project repository sites; on the Project website (ftp://ftp.cpuc.ca.gov/gopher-data/environ/tehachapi_renewables/TRTP.htm); and through the Lead Agencies.

The San Gabriel Watershed and Mountains Special Resource Study will not change the Forest Service’s exclusive jurisdiction over approving special uses on National Forest System lands. Portions of TRTP on National Forest System lands are subject to the 2005 Angeles National Forest Land Management Plan, which will also be unaffected by results of the Park Service study.

The information on TWRA, incorporated herein by reference to the Final EIR, is not meant to provide project-specific analysis, but to give a clear picture of cumulative impacts from
TWRA development. Please see the first page of the Executive Summary for further clarification.

A.17-17 A Mitigation Monitoring and Reporting Program was not developed as part of the Draft EIR/EIS, but was presented in Appendix G of the Final EIR. All costs associated with implementation of the mitigation measures would be borne by SCE as part of the construction, operation, and maintenance of the TRTP.
Comment Set A.18: Puente Hills Landfill, Native Habitat Preservation Authority

Puente Hills Landfill
Native Habitat Preservation Authority

April 2, 2009

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Re: Comments on Draft Environmental Impact Report (DEIR)/Impact Statement (IS):
Tehachapi Renewable Transmission Project

Dear Mr. Boccio:

The Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) is a joint powers authority established pursuant to California Government Code Section 6500 et seq. with a Board of Directors consisting of the City of Whittier, County of Los Angeles, Sanitation Districts of Los Angeles County, and the Hacienda Heights Improvement Association. According to our mission, the Habitat Authority is dedicated to the acquisition, restoration, and management of open space in the Puente Hills for preservation of the land in perpetuity, with the primary purpose to protect the biological diversity. Additionally, the agency will endeavor to provide opportunities for outdoor education and low-impact recreation. The Habitat Authority’s jurisdiction extends within eastern Los Angeles County approximately from the intersection of the 605 and 60 Freeways in the west to Harbor Boulevard in the east.

The Habitat Authority appreciates the opportunity to comment on the draft Environmental Impact Report/Impact Statement (DEIR/IS) for the Tehachapi Renewable Transmission Project. Please include in its entirety our letters dated July 26, 2007 and September 27, 2007, that were previously submitted and are now attached hereto as a part of the Habitat Authority’s comments on the DEIR/IS.

The Habitat Authority is a major land owner and land manager within Segment 8 of the proposed project. The Habitat Authority is a government agency and, as such, should be provided the authority and consideration as has been extended to other agencies involved with this project, including Chino Hills State Park, Angeles National Forest, U.S. Army Corps of Engineers, and the Los Angeles County Sanitation Districts, as well as other cities and local agencies. All public agencies including park or preservation agencies should

A Joint Powers Agency created pursuant to California Government Code §6500 et seq.
7702 Washington Avenue, Suite C, Whittier, California 90602 • Phone: 562 / 945 - 9003 • Fax: 562 / 945 - 0303
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have the same authority to review and approve restoration plans and other plans and agreements related to project mitigation on lands they own or manage.

The Habitat Authority has had correspondence with Southern California Edison and their EIR consultant, Aspen Environmental Group, since 2007 regarding this project. We have made good faith efforts to be an active and cooperative agency in the review process. In a previous letter by the Habitat Authority dated July 26, 2007, it was encouraged that all possible alternatives be explored that avoid any impacts to the Habitat Authority properties. Given these points, and the numerous concerns expressed in previous letters regarding project impacts to biological resources and recreation on our lands, it is not understood why no project alternatives have been proposed within the portion of Segment 8A involving Habitat Authority lands. Not only were no alternatives proposed to avoid impacts to our lands, but a section of new alignment is proposed within this segment that would create additional impacts beyond the existing alignment. On the other hand, numerous alternatives have been proposed within the Chino Hills area. Although potential alternatives were evaluated in the Alternatives Screening Report, including tunneling and use of an alternate route further to the north, these were dismissed and not ultimately analyzed in the DEIR. We insist that project alternatives for the portion of the route traversing Preserve lands be fully analyzed in the DEIR as required by CEQA in an effort to reduce significant impacts through this area.

The Habitat Authority lands were set aside for preservation and management due to their unique value to local biodiversity and the fact that they represent some of the last remaining fragments of natural habitat in the area. Given that these lands are surrounded by existing development, the plants and animals on the Preserve already struggle with edge effects such as increased noise, pollution, and exotic species. New development projects continue to be proposed along the edge of the Preserve which cumulatively contribute to these edge effects, threatening the health of the preserved habitats and the many species that depend on them. The proposed powerline upgrade project will significantly contribute to these effects, as the project runs through a large portion of the Preserve, and will result in permanent impacts to the preserve in the form of new permanent structures, degraded and fragmented habitats, and increased noise. Although mitigation measures are proposed to reduce some of these impacts, the end result of the project will be large-scale, Preserve-wide impacts that permanently degrade the value of the lands for habitat and recreation. These impacts are significant and ultimately unavoidable despite proposed mitigation.

Proposed Project

The project maps do not include the Habitat Authority boundaries, making it difficult to adequately assess impacts from the project to the Preserve. The final DEIR/EIS needs to include the boundary of the Habitat Authority on the maps.

The location of the new roads as well as temporary staging and associated impact areas should all be shown on the project maps in the DEIR/EIS and specific impacts from each of these areas within each segment should be analyzed and quantified for full disclosure.
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reviewing information provided by DEIR consultant Aspen Environmental Group, it appears that many of the staging areas will be located within the ROW; however, in some cases, alternative nearby locations may be more appropriate outside of the ROW that would reduce impacts to habitats. The Habitat Authority is available to coordinate the relocation of some of these temporary impact areas on the Preserve.

The proposed construction schedule for Segment 8 is nearly three years. Does this mean that construction activities will be constant during this time period throughout the entire segment? If not, please describe the anticipated number and duration of construction events for each tower, new road, or other associated project features. This level of detail is necessary to fully understand and evaluate the potential impacts that this disturbance will have on wildlife and recreation in the area.

It is unclear what type of long-term maintenance activities will be necessary for the towers, roads, and right-of-ways (ROWs). Will tree trimming/topping be required within the entire length and width of the ROW? How frequently will maintenance activities occur?

The document needs to explain why new alignments are proposed between Mileposts 6 and 7 of Segment 8A and near Fullerton Road. These additional routes would result in impacts to sensitive resources on Habitat Authority lands. No proposed project alignments or alternatives have been developed in an effort to reduce any impacts to Habitat Authority lands or resources. This document must analyze alternatives in an effort to address significant environmental impacts along the portion of the route through the Preserve.

The Habitat Authority recommends using the existing towers wherever possible along the portion of Segment 8A within the Preserve instead of replacing or creating new towers. This would reduce the amount and duration of construction-related impacts to our native wildlife and plants. The project proposes to utilize existing towers and to keep the existing ROW width through Chino Hills, even though this will overburden the line. Why can't this also be done for the lines through Habitat Authority lands instead of constructing new towers and widening the ROW by 100 feet?

In reviewing information provided by DEIR consultant Aspen Environmental Group, a pulling staging area near the Roland Water District facility is proposed, however, it is within the Preserve (in Powder Canyon) outside of SCE's ROW. This location is completely unacceptable and needs to be eliminated. While reviewing this same information provided by Aspen, a new tower location, Structure 25 M45-T3 is proposed immediately adjacent to lands owned by the Sanitation Districts of Los Angeles County that are managed as a part of the Preserve by the Habitat Authority. The reasoning for rerouting the ROW away from the adjacent cemetery property onto the Preserve is not explained in the DEIR/IS. This new route is not acceptable and needs to be eliminated.

Also, a new tower, referred to as Structure 39 M49-T1, is proposed at a known narrow wildlife linkage point at Hacienda Boulevard. This tower is located adjacent to the Preserve properties at a point in the Puente-Chino Hills Wildlife Corridor where passage is
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particularly narrow. Construction activities, the permanent tower and operational access will generate new impacts to wildlife movement in this area. Mitigation measures need to be explored that minimize, reduce or avoid impacts to wildlife movement. Additionally, according to Aspen there are several temporary/permanent roads outside of the ROW that are proposed but are vaguely mentioned in the DEIR/IS. These areas need to be addressed in the DEIR/IS and adequately mitigated for impacts to habitat fragmentation, visual resources, recreational resources, and habitat loss.

Also, the Habitat Authority has provided a conservation easement to the California Department of Fish and Game for coastal sage scrub over specific parcels in the Turnbull Canyon portion of the Preserve. Proposed new towers, pulling sites or roads for this area will need to avoid this conservation easement.

Furthermore, any access by SCE over Habitat Authority properties will require indemnification and releasing the Habitat Authority from all associated liabilities through an agreement to be negotiated at a later date.

Biological Resources

As noted in this section, a Biological Assessment is being prepared and will be an appendix to the FEIR. However, as the project has the potential to adversely affect listed species on Habitat Authority lands, we would appreciate the opportunity to review this document prior to the FEIR and submission to the U.S. Fish and Wildlife Service.

Under the State portion of the Applicable Laws, Regulations, and Standards section, it should be noted that in addition to Section 3503.5 of the Fish and Game Code, which protects birds of prey, Section 3503 also protects the eggs and nests of all birds.

Regarding Applicant Proposed Measure (APM) BIO-1, please specify whether special-status plants and wildlife encountered during pre-construction clearance surveys would be relocated outside of the impact zone, and if so that they would be placed in suitable habitat beyond the limits of disturbance such that they are unlikely to return to the impact area. Also please note that relocation of wildlife species will require authorization from the California Department of Fish and Game.

Please describe how the comprehensive list of related projects for the cumulative impacts analysis was created. It does not appear that the Pacific Heights project (Tentative Tract Map No. 51153), one of the larger proposed residential development projects adjacent to the Habitat Authority’s Powder Canyon property in Hacienda Heights (Los Angeles County), is one of the listed related projects. That project will result in considerable impacts to biological resources, many of which will be similar to those resulting from the proposed project.

Vegetation Communities
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In Table 3.4-17, regarding impacts to vegetation communities, it appears that the acres of off-site mitigation for permanent impacts are incorrect based on the impacted acres and the mitigation ratios shown. For example, for California walnut woodland, it states that 1.4 acres would be permanently impacted, and at the off-site mitigation would be 4.2 acres; given this, the mitigation ratio should be 3:1, not 1.5:1 as given in the table. In addition, mitigation for temporary impacts to sensitive vegetation communities such as California walnut woodland and coastal sage scrub should be implemented at a 2:1 ratio, as opposed to the stated 1:1 ratio, to compensate for the temporal loss of these sensitive communities.

The DEIR states that coast live oak woodland habitat is locally and regionally abundant. However, within the Puente Hills area, oak woodlands are limited. In fact, the Powder Canyon Significant Ecological Area (SEA) was established by the County in large part due to the presence of oak woodlands in this area and the relative rarity of this habitat in the area. On lands owned or managed by the Habitat Authority, oak woodlands comprise only approximately seven percent of the habitat. Continued development of the remaining private lands within the Puente Hills, such as the Pacific Heights project (Tentative Tract Map No. 51153) which will impact over five acres of oak woodland habitat, also threatens the remaining oak woodland habitat in the region.

Mitigation Measure B-1a requires restoration of impacted native vegetation communities. This measure needs to clearly state what is proposed for National Forest Service (NSF) lands and what is proposed for other lands, as it is generally unclear. In addition, the Habitat Authority should be given the authority to approve the restoration plan for restoration that will occur on land owned or managed by the Habitat Authority. This measure calls for using only native, locally collected seed for restoration and that the use of commercially purchased seed will only be allowed by the Forest Service on NSF lands; this same provision should apply to the Habitat Authority and its lands. Regarding replacement ratios for oaks, we agree that the ratio of replacement to impacted oaks should be at least 3:1, and up to 10:1 for large oaks; however, this is only required for oaks on NSF lands. On non-NSF lands, only the minimum required by the local jurisdiction’s ordinance (i.e. the Los Angeles County Oak Ordinance) is proposed. Why are oaks more valuable on NSF lands? This is especially perplexing given the limited amount of oak woodland in the Puente Hills, as mentioned previously. On a related note, why are the mitigation ratios for vegetation communities higher on NSF lands than non-NSF lands? By having different ratios, it indicates that the vegetation communities on non-NSF lands are of lower value; however, for the Puente Hills area, many of our vegetation communities represent the remaining fragments of habitat in an otherwise heavily developed area, which makes them highly valuable for wildlife and regional biodiversity. As previously stated, all public park/preservation agencies should have the same standards applied for value assessment and mitigation. In addition, the standard mitigation ratios for sensitive vegetation communities is generally at least 2:1; this ratio was recommended in our letter dated July 26, 2007, along with the suggestion to remove eucalyptus trees on Authority lands as part of habitat restoration and mitigation obligations. Finally, this mitigation measure states that the mitigation ratios on non-NSF lands can be adjusted with CPUC approval, and that they could range from 0.5 to the maximum noted. Any future adjustments that would reduce the
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Mitigation ratio would warrant full analysis and disclosure to ensure that the ratio adequately compensates for the impact; therefore, the ratios proposed in this mitigation measure should be considered the minimum, and any future adjustments allowed for these ratios should only be for increases.

Mitigation Measure B-3a and B-3b seem to focus exclusively on mitigating for noxious weed impacts on NFS lands. The only mention of non-NFS lands states that “ROW easements located on private lands shall include adaptive provisions for the implementation of the Weed Control Plan.” The impact analysis discussion regarding noxious weeds is also unclear; as it states that “general weed management practices such as vehicle cleaning would reduce the spread of noxious weeds on non-NFS lands.” The intent of these statements in controlling weeds on non-NFS lands is vague and unclear, and it sounds as if the development of such weed control efforts would be deferred until a later date. This is unacceptable, considering that the introduction and spread of noxious weeds on Habitat Authority lands could have serious adverse impacts on our native and restored habitats and on our wildlife and plant species, including sensitive species. As such, the implementation of Mitigation Measures B-3a and B-3b will not reduce impacts from noxious weeds on non-NFS lands to less-than-significant levels. As discussed above, it is also unclear why mitigation for noxious weeds on NFS is treated separately and with much more detail than for non-NFS lands. As stated above, this disparity seems to indicate that the vegetation communities on non-NFS lands are of lower value and not as threatened by noxious weeds; however, many of our vegetation communities represent the remaining fragments of habitat in an otherwise heavily developed area, which makes them highly valuable for wildlife and regional biodiversity. Once again, all park/preservation agency lands warrant the same standards.

Comments Regarding Sensitive Species

The DEIR notes that California androsace (Androsace elongate ssp. acuta) and fragrant pitcher sage (Lepechinia fragrans), both California Native Plant Society (CNPS) List 4.2 plant species, are unlikely to occur along Segment 8 as it is outside of the known range of the species. However, according to the California Native Plant Society’s Online Inventory, these species are reported to occur in Los Angeles County.

The DEIR notes that Catalina mariposa lily (Calochortus catalinae), a CNPS List 4.2 plant species, and Plummer’s mariposa lily (C. plummerae), a CNPS List 1B.2 plant species, are likely to occur along Segment 8. This should be changed to present, as both species have been observed on Habitat Authority lands in close proximity to the proposed alignment; one occurrence of Plummer’s mariposa lily may actually be mapped within or directly adjacent to the alignment between Mileposts 11 and 12.

The DEIR notes that San Diego horned lizard (Phrynosoma coronatum blainvillii), a California Department of Fish and Game (CDFG) species of special concern, is considered unlikely to occur along Segment 8 as it is outside the range of the species. However, many occurrences of this species have been documented throughout Los Angeles County. This
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The DEIR notes that orange-throated whiptail (Aspidoscelis hyperythrus beldingi), a CDFG species of special concern, is unlikely to occur in Segment 8 due to the fact that habitat in the vicinity is highly degraded. Please elaborate on the habitat quality that makes this species unlikely to occur, as opposed to the conditions that would make it likely to occur. Also, why was the coastal western whiptail (Aspidoscelis tigris stejnegeri), which has a State sensitivity ranking of S2-S3, not evaluated for presence? Many occurrences of this species have been documented in Los Angeles and Orange Counties. It is known to occur in semi-arid areas with sparse vegetation, but it can also occur in woodland and riparian habitats.

As stated in our previous letter dated September 27, 2007, the spadefoot occurs at a small area of vernal pools directly adjacent to the access road for the towers within the right-of-way in Hacienda Heights, and would be expected to make heavy use of roads for dispersing, and road ruts and verges for breeding. Thus, it would be vulnerable to crushing and disturbance by trucks and equipment. This would be a significant adverse impact that should be addressed in the DEIR/EIS.

Mitigation Measure B-16 for surveys and avoidance of federally threatened coastal California gnatcatchers during construction seems to be contradictory. The second paragraph states that no project activities will occur within 300 feet of a territory or nest. However, the last paragraph says that a biologist will monitor all construction activities within 300 feet of occupied habitat. Also, the measure states that the biologist will have the authority to stop all construction activities “until appropriate corrective measures have been completed.” However, it is unclear what type of activity or gnatcatcher response would trigger the biologist to stop construction activities, and what the corrective measures might be. This measure should require the biologist to contact USFWS regarding construction stoppage triggers, such as any activity within the protected buffer zone or observations of gnatcatcher disturbance behavior, and corrective measures, such as creation of additional buffer.

Mitigation Measure B-17 requires acquisition and/or restoration of coastal sage scrub habitat at a 3:1 ratio as mitigation for impacts to coastal California gnatcatcher critical habitat. This ratio should apply to permanent as well as temporary impacts to this habitat. The Habitat Authority’s Preserve is within this critical habitat designation.

Regarding the potential impacts to sensitive amphibian species, the DEIR accurately notes that the western spadefoot toad (Spea hammondii), a CDFG species of special concern, occurs in Habitat Authority lands. It should be noted, however, that the seasonal wetland habitat where this species was found occurs directly adjacent to the existing access road between Mileposts 8 and 9 along Segment 8. Therefore, Mitigation Measure B-27 should specify that the monitoring biologist will be present not only during ground-disturbing activities, but also will monitor the access road adjacent to the spadefoot toad habitat,
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particularly during the breeding season when they are more likely to be above-ground (generally January through May, or any rainy period). The biologist must also monitor road conditions to ensure that erosion or runoff from the road due to increased use during construction does not result in adverse water quality impacts to the seasonal wetland where the spadefoot toads may breed.

Mitigation Measures B-33a and B-33b for impacts to roosting bats should include the methodology that will be used to survey for roosting bats, and the width of the buffer zone around construction areas that will be surveyed. A minimum buffer zone of 200 feet is recommended. In addition, substitute roosting habitat for impacted maternity colonies should be designed to be appropriate for the particular bat species that will be impacted, and the design should be developed in coordination with CDFG.

As stated in our previous letter dated September 27, 2007, aerily-foraging animals (incl. all three sensitive bats) would be at greatest risk of collision with wires that are placed in "new" areas, since they have presumably developed avoidance mechanisms around existing lines. The discussion of impacts to bats from transmission line strikes admits that there is very limited information on bat strikes with transmission lines, yet the DEIR concludes that such impacts to bats will be less than significant. In addition, a recent study has shown that electromagnetic fields (EMF) can have an effect on bats, causing them to avoid areas of high EMF. Given the fact that EMF will increase along the powerline alignments due to the project, the potentially adverse impacts to bats should be discussed, including a potential reduction in their potential habitat due to their increased avoidance of the powerline areas. Appropriate mitigation to avoid or minimize impacts should be developed in consultation with the Habitat Authority and CDFG.

Mitigation Measure B-38 requires focused surveys and passive relocation for American badgers. This measure requires that if an occupied badger den is found that ground-disturbing activities shall be avoided within 50 feet. This buffer does not seem adequate, especially considering the potentially high levels of noise and vibration that may be associated with construction activities. A more appropriate buffer should be at least 200 feet. The den survey distance from construction areas should also be the same as the non-disturbance buffer around occupied dens.

General Wildlife and Birds

Mitigation Measure B-5, requiring pre-construction surveys for breeding birds, should be revised to account for raptors which can begin breeding as early as January 1, and to include the standard avoidance buffer for raptors which is 500 feet. These changes will make the measure consistent with standard CDFG recommendations.

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APPENDIX F. DRAFT EIR/EIS COMMENTS AND RESPONSES
Tehachapi Renewable Transmission Project

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Regarding impacts to birds from electrocution, the DEIR states that “raptor safety protection in the form of swan wrap will be required on towers/conductors (lines) on NFS lands”. Why are such measures only proposed on NFS lands? The Puente Hills supports numerous raptors and such protection measures should be implemented in this area as well. Once again, all park / preservation agency lands warrant the same standards.

The analysis of potential impacts to birds resulting from collisions with overhead wires and towers is surprisingly sparse considering this is currently one of the primary issues of biological concern regarding powerline and other related tower projects. Numerous studies have documented the high bird mortality rates associated with towers and wires, with one such study estimating that approximately 130 million birds are killed annually due to transmission line collisions in the United States\(^2\). And studies have shown that bird mortality increases with tower height\(^3\). The DEIR states that passerines have a lower potential for collisions than larger birds, such as raptors, and that passerines tend to fly under powerlines. However, during migration, passerines fly at greater heights. In addition, because most passerines migrate at night, they have been found to be highly susceptible to lights placed on tall towers, particularly red and steady-burning lights\(^4,5\). The birds are attracted to these lights, especially in poor visibility conditions, and become disoriented, causing them to collide with the towers, wires, or other birds. Given that some of the towers proposed within Segment 8 may be taller than 200 feet, these towers would be required to comply with Federal Aviation Administration (FAA) lighting requirements, which may include a combination of red and/or steady burning lights. This impact was not analyzed in the DEIR. Also, given that the Puente Hills are one of the few remaining open space areas in the region, and that it lies at the western end of the Puente-Chino Hills Corridor, this area is a part of the Pacific Flyover and serves as an important migratory stopover point for birds migrating through southern California twice a year. The addition of new towers and powerlines (particularly between mileposts 11.2 and 13.3 which will consist of three separate lines), some of which are considerably taller than the existing features, is likely to result in a permanent increase in annual bird mortality due to collisions, especially during migration. It is disappointing that the impact analysis did not include more detailed information regarding baseline studies of avian mortality from the existing towers and powerlines, nor did it discuss the potential increase in impacts from increased tower heights and number of powerlines, nor did it discuss potential differences in impacts between lattice vs. tubular steel pole tower designs. Unfortunately, no mitigation is proposed for any of these impacts to birds from collisions. Implementation of APM BIO-9 does not mitigate for any of these impacts, as the Suggested Practices for Raptor Protection on Power Lines only addresses recommendations for tower designs to


\(^4\) See previous footnote.

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prevent large bird electrocutions (i.e. when landing on lines or conductors). In the absence of appropriate and feasible mitigation negotiated with the Habitat Authority, this impact should be considered significant and unavoidable.

The DEIR discusses potential impacts to wildlife from the additional corona noise from the powerlines. As noted in the discussion, the corona noise increases with the voltage of the line, and would be much more audable in areas away from other ambient noise, such as freeways. Given that the proposed project would result in an the permanent addition of higher voltage powerlines running directly through the Habitat Authority lands, which are quieter than surrounding developed areas, it is highly likely that wildlife will be negatively affected by the substantial increase in corona noise. The DEIR notes that such noise would only occur in the immediate vicinity of the ROW and would attenuate away from the powerlines; however, there is no discussion of how much the noise decreases from a given distance. Given the increased number of powerlines, increased voltage, and in some places increased width of the ROW, it is unknown how much habitat adjacent to the ROW will be affected by this increased noise. The impact discussion states that this is not significant because there is enough available habitat for wildlife in the area that they can merely move away from the noise. However, habitat is limited within the Puente Hills, and is especially narrow at the choke-points of the Puente-Chino Hills Wildlife Corridor (such as along Harbor and Hacienda Boulevards). The proposed alignment runs directly through or adjacent to these choke points, and if this additional noise causes avoidance of these areas by wildlife this may have a permanent adverse impact on the wildlife and their movement in the area. It is not necessarily appropriate to presume that wildlife is already acclimated to the existing corona noise such that additional noise will not have an adverse effect. In the Noise section of the DEIR, the impact from operational corona noise was considered a significant and unavoidable measure. Since nature and wildlife preserves and parks were identified as sensitive noise receptors, which include associated wildlife species, it is unclear how an impact conclusion of less than significant was determined for this impact in the Biological Resources section of the DEIR. Considering the permanence of this impact, the value of the Habitat Authority lands as one of the last remaining refuges and movement corridors for wildlife in the area, the relative lack of information known about this issue, this impact should be considered significant and unavoidable. Mitigation should be explored and included to reduce this impact, such as larger-diameter powerlines and insulated conductors; such measures should also be applied to existing powerlines along the alignment.

Finally, as stated previously, the Habitat Authority lands were set aside, in part, because they represent some of the last remaining fragments of natural habitat in the area. The proposed construction of new permanent structures, and especially the widening of the ROW by 100 feet within Powder Canyon, will continue to fragment these habitats by creating additional physical disturbance, loss of habitat, and increased noise. This will negatively affect resident wildlife by causing them to avoid these areas, further confining them to the reduced available habitat and constraining resources for all species. It has been well established that habitat fragmentation can lead to disruptions in wildlife movement and the eventual demise of populations. The widening of the ROW within Powder
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Canyon, which is currently a relatively undisturbed area of high quality habitat, will significantly and permanently alter the land use and compromise its value for resident species, for which there is no feasible mitigation. Additionally, the creation of a new ROW in Powder Canyon will bisect this already constricted area, compounding the fragmentation of this area. As previously mentioned, this canyon is currently identified as a Los Angeles County Significant Ecological Area, and the entire Preserve is proposed to hold this designation under the current draft Los Angeles County General Plan. Fragmentation to these areas needs to be addressed in the document and mitigated. Funding for additional acquisition to offset the impacts or for new habitat restoration are possible mitigation measures that will help reduce these adverse impacts.

Visual Resources

Many of the visual resource issues raised in this section of the DEIR address impacts related to scenic integrity, visual scarring, and long-term loss of the scenic quality of viewsheds; however, these are only mentioned for the Angeles National Forest. As stated in the DEIR, “scenic integrity” is defined as the state of naturalness, and the project will reduce the state of naturalness throughout the Preserve, as the powerline route is highly visible throughout the Preserve from nearly all 25-miles of its trails and roads.

As stated in our previous letter dated July 26, 2007, the project will significantly impact the aesthetic quality of the Puente Hills from a recreationist perspective. The existing towers are already visible throughout the hills and visible from many miles of public trails, and the installation of new and bigger than existing towers will permanently change the character of the landscape and the experience of the hiker, biker, equestrian, or bird watcher in the hills. The 21-mile backbone trail for this area, the Los Angeles County Schabarum Trail – also designated as the National Park Service’s recreational historic route of Juan Bautista De Anza – runs underneath or directly near the transmission line throughout the Habitat Authority’s jurisdiction. Key observation points should have been analyzed in the DEIR for the trails along Segment 8A on Habitat Authority lands from a recreationist’s perspective, as the change from the existing high quality and value of the view from the trails will change significantly following installation of the additional alignment. From this perspective, the viewer exposure, viewer concern, visual quality, and overall visual sensitivity would be rated as high. In fact, during a trail user survey on the Preserve, 56 percent of those surveyed cited enjoyment of scenic beauty as a reason for their visit, and 60 percent cited experiencing nature as a reason for their visit6. Visual analysis was conducted for a view from a hiking/equestrian trail within Chino Hills State Park, and all of these visual issues were ranked as high in that analysis. It is unclear why the same analysis was not conducted on the Preserve given the high use of our trail system. The proposed project will have a significant, unavoidable and adverse impact on the visual resources of the Preserve and needs to be fully mitigated.

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Comment Set A.18, continued: Puente Hills Landfill, Native Habitat Preservation Authority

As stated in our previous letter dated July 26, 2007, the installation of a new line within the eastern portion of Powder Canyon will bisect a currently undisturbed vista area, negatively impacting the area aesthetics. This new bisecting line is directly visible to all visitors within the first minute of entering the Preserve and before reaching the designated public parking area. The first experience for visitors will be permanently changed with this new proposed tower. The presence of existing powerlines adjacent to this area does not diminish the visual impression as implied by the DEIR. As noted in the Wilderness and Recreation section of the DEIR, the new alignment in this area would “contrast substantially with the goals of open space and natural resource protection for which the Puente Hills Habitat Area is managed by the Habitat Authority. The proposed project...would contribute to the degradation of the backcountry experience for public recreationists.” Despite the implementation of mitigation measures to reduce this impact, such as matching existing adjacent towers and using appropriate finishes on the towers, this impact cannot feasibly be reduced to a less-than-significant impact.

The proposed re-routing of the alignment on the Rose Hills Cemetery property adjacent to Sanitation District lands (the Puente Hills Landfill) would result in the relocation of the lines from the west-facing slope to the ridge top. This, coupled with the additional line and the increased heights of the towers, would result in adverse significant visual impacts to residents and trail users to the east in Hacienda Heights. Currently, residents in this area cannot see this portion of the alignment, but the proposed project would introduce a new disruption in this public viewed for the entire area. Visual simulations must be prepared for this substantial change to the visual conditions in Hacienda Heights, and if mitigation measures cannot be developed to reduce this impact to less than significant levels, then this re-alignment should be abandoned and the existing alignment should be utilized.

Regarding Mitigation Measure V-4b which recommends slope-rounding and re-contouring, any such proposals on Habitat Authority lands shall be approved by the Authority prior to implementation. In addition, the Authority shall review and approve the plans for such grading and associated habitat restoration.

Regarding Mitigation Measure V-4d for disposal of excavated materials, the Habitat Authority shall be consulted as to the appropriate location (on the Preserve or off-site) for the disposal of such material to ensure that material is not placed on sensitive habitat. Such material shall be revegetated with native plants to the satisfaction of the Habitat Authority. In addition, similar to the requirement for NFS lands, any existing footings designated for removal shall be disposed of off-site.

The DEIR states that the visual impacts associated with access and spur roads would be significant and adverse for Segments 6, 10 and 11. Why would the visual impacts associated with the new spur roads for the new ROW along Segment 8A at Rose Hills Memorial Park not also be considered significant and adverse? The impact analysis for the South Area notes that the existing landscape character and visual quality of two viewsheds would be greatly affected by the presence of the new access and spur roads that are...
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proposed on Preserve lands for this new ROW. In addition, it is unclear how many new roads will be required to access this new portion of the ROW.

Impact V-6 discusses long-term loss or degradation of a scenic highway viewshed or a scenic trail viewshed. However, there is no mention of the permanent impact the project will have on the numerous miles of trails within the Preserve, some of which are almost directly underneath the proposed alignment. Mitigation is proposed for such impacts on NFS lands, but nothing is proposed for the Preserve. The impacts discussion for areas with existing powerlines notes that the project would “lead to an increased industrial landscape character and a decrease in visual quality throughout the South Area.” As discussed above, many visitors to the Preserve cite natural beauty as a main reason for their visit, and the Wilderness and Recreation section noted that the project will contribute to the degradation of the recreational experience. Therefore, we do not agree that the long-term impact of the proposed project would be less-than-significant. Mitigation for this impact is necessary.

We would like to note that the DEIR acknowledges that the proposed project’s conflict with the Habitat Authority’s RMP Goal VISUAL-1 and Objective VISUAL-1.2 is considered a significant and unavoidable impact. This analysis underscores the significant, permanent change this project will have on the overall visual character of the Puente Hills for recreational users.

In addition to the suggested mitigation measures outlined in the DEIR/IS, further mitigation is absolutely necessary to offset the impacts to the Preserve including its 25 miles of trails as detailed above. This additional mitigation should strive to increase the visual experience of the Preserve visitor such as with habitat restoration. Restoring habitat will create a visually pleasing landscape and should be implemented through the Habitat Authority’s in-lieu fee program described at our website http://www.habitatauthority.org/deviledmit.shtml.

Historic/Cultural

As stated in our previous letter dated July 26, 2007, the Los Angeles County Schabarum Trail runs underneath or directly near the transmission line throughout the Habitat Authority’s jurisdiction. This trail has also been designated as the National Park Service’s recreational historic route of Juan Bautista De Anza and should be considered an important historic and cultural resource for the area. The potential impacts to this trail were not considered in the DEIR, despite the fact that construction activities along this road will impact the trail significantly and the permanent visual impact of the additional powerlines along this trail will diminish its overall value.

Wilderness and Recreation

The Skyline and Schabarum Trail is incorrectly referred to throughout the section as the Portola Trail. It should be referred to as the Juan Bautista De Anza Trail, which is a National Historic Trail Recreation Route.
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This section only acknowledges the Powder Canyon portion of the Habitat Authority lands along Segment 8A; however, there are many other parcels owned or managed by the Authority within one-half mile of the alignment such as in Hacienda Heights at the top of the ridge where the Schabarum Trail intersects with the Abwinga and Coyote Trails.

The discussion of construction-related impacts to the recreational use of trails must include a description of the anticipated length of time necessary for construction activities per tower and/or section in order to more accurately quantify the length of time that trails will need to be closed. In order to avoid complete closure of trails during construction, we recommend additional measures that would allow for safe use of the trails during construction activities, including the use of flagmen and signage. In addition, any signage on Preserve trails should be approved by the Habitat Authority and installed through a coordinated effort with our rangers as least two weeks prior to any construction activities that will impact recreational use of the trail(s).

Please describe what types of activities are required for maintenance as noted in the impacts discussion, and the length of time and frequency that each type of maintenance activity would be expected to disrupt recreation activities for trails along tower access roads or near towers.

There is no impact discussion that adequately addresses the short-term or long-term degradation of recreational uses within the Preserve. One of the significance thresholds for recreation requires an evaluation of whether the project will “substantially contribute to the long-term loss or degradation of the factors that contribute to the value of federal, State, local, or private recreational facilities or wilderness areas.” The only facilities or areas that are analyzed for long-term impacts are designated wilderness areas, the Pacific Crest National Scenic Trail, Off-Highway Vehicle trails or Open Riding Area, or areas where the project would facilitate unmanaged recreational uses. The Preserve is considered a local recreational facility and yet long-term impacts to the use of the Preserve are not analyzed. Yet in the discussion of impacts to recreation from the operation and maintenance of the project it notes that the project would “contrast substantially with the goals of open space and natural resource protection for which the Puente Hills Habitat Area is managed by the Habitat Authority. The proposed project...would contribute to the degradation of the backcountry experience for public recreationists.” In addition, in the visual resources section, it notes that in areas with existing powerlines, the project would “lead to an increased industrial landscape character and a decrease in visual quality throughout the South Area.” As stated previously, a majority of the visitors cite “enjoyment of scenic beauty” and “experiencing nature” as reasons for visiting the Preserve. Given the fact that the Preserve represents one of the last remaining intact habitat areas in the region, and its proximity to dense residential areas, its recreational value as a place of natural escape and rejuvenation is high. The addition of new and taller powerlines will add additional visual disruption and noise to nearly all Preserve trails, permanently degrading the overall recreational experience. This impact must be fully analyzed in the DEIR for full disclosure, and should be considered significant and unavoidable, as feasible and adequate mitigation measures are unlikely.
Comment Set A.18, continued: Puente Hills Landfill, Native Habitat Preservation Authority

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Fire Management

We appreciate the incorporation of our previous comment in our letter dated July 26, 2007 requesting the prohibition of smoking on Habitat Authority properties. In addition, SCE shall agree to the safety precautions which are required as part of our standard access agreement (attached as Exhibit A), which includes additional precautions including carrying a fire extinguisher and shovel in each vehicle.

Land Use

The Land Use section of the DEIR only addressed potential conflicts with one of the Habitat Authority’s Management Resource Management Plan (RMP) Goals — “USF-2: Enforce protection of the varied resources and promote an enjoyable and safe environment for visitors.” The DEIR states that the project will not conflict with this goal because tubular steel poles would be used between Mileposts 9 and 11.5, safety set-backs, and habitat restoration. However, the substantial increase in the number of towers and powerlines would impair the view from most of the trails throughout the Preserve trail system, not just between Mileposts 9 and 11.5. Also, construction related noise and trail closures, as well as long-term permanent corona noise, would reduce the enjoyment of the trails. In addition, this section of the DEIR did not analyze potential impacts to several other applicable goals from the RMP; however the Visual Resources section noted that the project would be inconsistent with Goal VISUAL-1 and Objective VISUAL-1.2. As stated in our previous letter dated July 26, 2007, the proposed project has the potential to be inconsistent with the following RMP goals:

Goal BIO-3 Maintain all populations of native plants and wildlife with special emphasis on management of locally uncommon, sensitive, federally-threatened or endangered species and other sensitive resources.

Objective BIO-3.6 Protect and maintain all native vegetation communities paying special attention to sensitive vegetation types such as walnut woodland, oak woodland, coastal sage scrubs, riparian communities, and native grassland.

Objective BIO-3.7 Encourage new development adjacent to the Preserve to provide an appropriate buffer zone on the development site to minimize edge effects. Promote additional methods to minimize potential edge effects with new and existing urbanization.

Goal VISUAL-1: Protect and enhance views and distinctive landscape features that contribute to the setting, character and visitor experience of the Preserve.

Objective VISUAL-1.2 Protect views from within the Preserve to outlying properties. Evaluate proposed projects surrounding the Preserve with a priority to retain the visual quality of the Preserve’s undeveloped landscape.
Comment Set A.18, continued: Puente Hills Landfill, Native Habitat Preservation Authority

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Objective VISUAL-1.3 Protect visitor experience of the Preserve from noise impacts.

Thank you for your consideration, and please include me on the mailing list associated with the proceedings for this project. Please do not hesitate to contact me or Andrea Gullo, Executive Director, for discussion at (562) 945-9003 or agullo@habitatauthority.org.

Sincerely,

Bob Henderson
Chairman

C: Board of Directors and Advisory Committee
Response to Comment Set A.18: Puente Hills Landfill, Native Habitat Preservation Authority

A.18-1 Thank you for your participation and review of the Draft EIR/EIS. Your letters from 2007 are included in the Project record and were previously incorporated into the Scoping Report for the proposed Project.

A.18-2 Thank you for your comment. The CPUC and Forest Service have consulted with responsible agencies, trustee agencies, and any other public agency with jurisdiction by law with respect to the project (Pub. Res. Code, § 21104). Under CEQA, responsible agencies are public agencies other than the lead agency with responsibility for carrying out or approving the project (Pub. Res. Code, §21069). Trustee agencies are state agencies with jurisdiction over natural resources affected by a project that are held in trust for the people of the state of California (Pub. Res. Code, § 21070). The CPUC is the Lead Agency under CEQA and the USDA Forest Service is the Lead Agency under NEPA for this project. The U.S. Army Corps of Engineers is a NEPA cooperating agency. The California Park and Recreation Commission and the California Department of Parks and Recreation have been identified as responsible agencies under Alternative 4, as they would need to issue approvals if that alternative is approved by the CPUC. The Department of Toxic Substances Control is also a responsible agency under Alternative 4. In addition, there are various other Federal and State agencies that would need to issue permits if the proposed Project or an alternative is approved. These agencies are listed in Table 1-1 of the Draft EIR/EIS. No local government agencies have approval authority over the proposed Project.

A.18-3 Thank you for your efforts in reviewing the proposed Project and providing input to the EIR/EIS process. An EIR/EIS is required to analyze a reasonable range of alternatives that would feasibly attain most of the project objectives and would address significant environmental issues associated with the project (CEQA Guidelines § 15126.6; 40 CFR §1502.14; CEQ, NEPA’s Forty Most Asked Questions, No. 1). An EIR/EIS is not required to consider infeasible alternatives. (Id.) Nor is an EIR/EIS required to consider alternatives to a component or segment of a project (Big Rock Mesas Prop. Owners Ass’n v. Board of Supervisors (1977) 73 Cal. App. 3d 218, 227). The requirement that an EIR/EIS describe alternatives to the project applies to the project as a whole and not to the various facets thereof. (Id.) While the Habitat Authority made a general request that alternative routes be analyzed, it did not propose or identify any alternative routes for analysis. There was no request to analyze any specific alternative route and no feasible alternative routes have been identified for Segment 8A. An investigation was conducted to see if it was possible to identify alternative routes for Segment 8A between the San Gabriel Junction (the western end of Segment 8A) and Mesa Substation (the eastern end of Segment 8A). In accordance with comments made during Scoping, the investigation looked at existing utility, flood control, and transportation corridors in the San Gabriel Valley to see whether there was available space within or adjacent to any of these corridors to accommodate a new 500-kV transmission line. The investigation did not identify any existing corridor or combination of corridors that would come close to providing a connection to the western and eastern ends of Segment 8A. The existing corridors are either already occupied by other facilities or did not provide adequate width to accommodate a 500-kV transmission line. Widening of existing corridors to accommodate a new transmission line would have required acquisition and relocation of numerous homes and businesses. Therefore, it was not possible to identify a suitable alternative corridor for Alternative 8A for analysis. Further, establishment of such a corridor
would result in a much longer length for Segment 8A and a much greater degree of impact to existing homes and businesses than the proposed Project. As stated above, infeasible alternatives need not be analyzed in the Draft EIR/EIS, nor do alternatives that would not avoid or substantially lessen the adverse effects of the project. The screening process used in the Draft EIR/EIS is described in the Alternatives Screening Report (Appendix A) and indicates that investigations did not identify a feasible alternative route that could even be evaluated in the screening process.

The process for identification and evaluation of alternatives was much different in Chino Hills. Early in the Draft EIR/EIS process, the City of Chino Hills proposed an alternative for analysis. The City also verified with SCE that the alternative was feasible from an electrical standpoint and would meet the Project objectives. In response to criticisms of the City’s original alternative, the City went on to formulate three other variations of its alternative. This alternative and its variations are analyzed in the Draft EIR/EIS.

A.18-4 Thank you for your comment. The Draft EIR/EIS discusses the importance of Habitat Authority lands in the regional landscape and considers the increasing number of urban development projects near the Preserve which encroach upon remaining open space (Draft EIR/EIS, page 3.15-80). The Draft EIR/EIS concludes that the effects of the proposed Project on recreation would be less than significant with implementation of Mitigation Measures R-1a, R-1b, R-1c, R-1d, and R-1e (Draft EIR/EIS, pages 3.15-80 through 3.15-86). The Draft EIR/EIS also concludes that impacts of the proposed Project on biological resources, including loss of native vegetation and disturbance to wildlife in and around the Puente Hills Habitat Area, would be less than significant with the implementation of mitigation measures (Draft EIR/EIS, Section 3.4 and pages 3.4-124; 3.4-143). The mitigation would include a series of measures to restore vegetation, control dust and noise, and avoid or minimize effects to wildlife (Mitigation Measures B-1a, B-1b, B-1c, AQ-1a, and H-1a; Draft EIR/EIS, pages 3.4-119 through 3.4-123). As presented in the analysis, the effects of the project and the proposed measures would mitigate the project to acceptable levels.

A.18-5 Habitat Authority boundaries have been added to Figures 2.2-1v and 2.2-1w (Project Location Strip Maps), as well as Figure 3.15-4 (Recreational Resources in the South Region), using GIS data provided by the Habitat Authority. Additionally, impacts of the proposed Project that would affect the Preserve are discussed in detail throughout Section 3.15 of the Draft EIR/EIS.

A.18-6 An EIR/EIS is required to evaluate environmental impacts only to the extent that it is reasonably feasible to do so and is adequate as long as it is prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences (40 CFR §1502.15). The scope of this project covers approximately 173 miles. Given the standards of adequacy and the scope of this project, individual project components, like staging areas, do not need to be discussed individually as long as their impacts are accounted for in the EIR/EIS analysis of the project as a whole. Consistent with CEQA and NEPA, the EIR/EIS needs to collectively analyze the impacts to the project as whole not the impacts of hundreds of small individual project components.

There are also practical issues that must be taken into consideration in determining the appropriate level of detail to present in the EIR/EIS (CEQA Guidelines §§15144, 15145). There are thousands of individual land parcels directly affected by the proposed Project. It is impractical and unnecessary for the EIR/EIS to provide separate impact analyses for
individual property owners. Similarly, there are thousands of individual project features, such as structures, staging areas, wire setup sites, and roads, and it is not practical or necessary to assess the impacts of these project features individually or by property owner because impacts that would occur from these project features are accounted for in the analysis of each project segment. For instance, land disturbance estimates are presented in the Draft EIR/EIS for the entire Project and for each project segment, and these are based on estimates of disturbance associated with each project feature, but estimates of land disturbance per property are not provided and are not needed to assess impacts associated with land disturbance.

Further, in order to present maps at a scale that would show small individual project features, such as wire setup sites and crane pads, the EIR/EIS preparers estimate that close to 500 additional 11x17 map pages would need to be added to the EIR/EIS. Not only is this problematic from a practical standpoint, it would also be inaccurate and misleading. The sizes and locations of all project components are preliminary and subject to change. Exact sizes and locations of individual project components won’t be known until after final engineering design for the project has been completed. Therefore, presentation of preliminary design information would have been incorrect as the locations of individual project components can and will shift between preliminary and final engineering. This would have caused the public to focus on details that are inaccurate and will undoubtedly change when and if the project moves into the engineering design phase.

While the exact sizes and locations of all project components are not known at this time, the preliminary design information provided by SCE provided a good basis for the impact analysis in the Draft EIR/EIS. Some latitude was included in the analysis to reflect the fact that the sizes and locations of all project features are not finalized. Further, an EIR/EIS is not required to consider alternatives to each individual component of a project (See Big Rock Mesas Prop. Owners Ass’n v. Board of Supervisors (1977) 73 Cal. App. 3d 218, 227). The requirement that an EIR/EIS describe alternatives to the project applies to the project as a whole and not to the various facets thereof. (Id.) Therefore, the EIR/EIS need not consider alternative locations for each staging area.

A.18-7 Construction activities are described in Section 2.2.12 (Proposed Project Construction) of the Draft EIR/EIS. While exact durations of each activity are not presented, it is expected that construction at any one location along the Project route would only occur for a limited amount of time before moving to another location along the ROW. Duration of construction activities at any one location would range from a few minutes to a few days, depending on the activity. Per Mitigation Measure R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas), SCE would coordinate construction with the authorized officer(s) or the agencies of all recreational areas affected by Project construction.

Adequate detail regarding construction activities is included in the Draft EIR/EIS to characterize the impacts and the need for mitigation as required under NEPA. Please see the response to Comment A.18-6 for additional discussion on the adequacy of the level of detail presented in the Draft EIR/EIS.

A.18-8 Operations and maintenance activities are described in Section 2.2.13 (Operations and Maintenance) of the Draft EIR/EIS. As described, inspections would occur approximately once per year via helicopter and/or truck and recurring maintenance identified in the inspection process would include vegetation management, invasive plant survey and control, wood pole management, insulator washing, insulator replacement, repair of ground wires,
tightening/repair of hardware, tighten/replacement of guy wires, and adjustments to switch mechanisms. Per Mitigation Measure R-1a (Coordinate construction schedule and maintenance activities with managing officer(s) for affected recreation areas), SCE would coordinate activities beyond the periodic visual inspections with the authorized officer(s) or the agencies of all recreational areas affected by Project construction.

A.18-9 The relocation of the ROW through the Rose Hills Memorial Park was proposed by SCE based on a request from the property owner to move the ROW to the eastern boundary of the property to allow for future development within their property. This coordination occurred prior to the PEA submittal to the CPUC and therefore is reflected in the design of SCE’s proposed Project (Alternative 2). With respect to the new alignment near Fullerton Road, between approximately S8A MP 11.2 and 13.6 there is an additional set of double-circuit 220-kV towers within the existing ROW limiting the available ROW width for accommodating the proposed double-circuit 500-kV structures. Between approximately S8A MP 11.2 and 13.3 the new structures would be accommodated by expanding the existing ROW by 100 feet to the south (see Figure 2.2-1w); however, due to existing permanent structures located in close proximity to the ROW at Fullerton Road (water tanks, church, private residences), the ROW cannot be similarly expanded as the ROW continues to the east. Therefore, SCE has proposed a re-route of the existing 220-kV transmission lines into a new ROW thereby avoiding this constrained area near Fullerton Road.

Please see the response to Comment A.18-3 regarding the NEPA requirements for the analysis of alternatives. As explained in that comment, the Draft EIR/EIS has adequately considered a reasonable range of alternatives under NEPA. Alternatives to reduce impacts to Habitat Authority lands were considered as discussed in Section 2.1.4 of the Alternatives Screening Report located in Appendix A of the Draft EIR/EIS. No specific re-route was identified that could avoid Habitat Authority properties without displacing numerous existing homes and businesses (see bullet “Avoid Impacts to Habitat Authority Properties”). Another option considered included use of tubular steel poles (TSPs) for the new double-circuit 500-kV structures as well as replacing the existing 220-kV structures with TSPs, with the intent that this would enable the upgrades to remain in the existing ROW and avoid the need for new ROW in the area of Fullerton Road (see bullet “Rowland Heights Water District Detour”). The feasibility of this suggestion was reviewed and it was determined that replacing all the structures within the ROW with TSPs would not avoid the need for new ROW. Consequently, after consideration of both alternate corridors and consolidation of and use of TSPs within the existing ROW through the Preserve, no other alternative specifically for reducing impacts to the Preserve was identified and carried forward for full analysis in the Draft EIR/EIS. Impacts to the Preserve would be minimized to the extent feasible through implementation of the mitigation measures presented in the Draft EIR/EIS.

A.18-10 The existing towers are not suitable for 500-kV circuits. The existing towers were designed for a 220-kV circuit and would not accommodate two 500-kV circuits for several reasons. First, the spacing between the wires on the existing towers is designed so that at 220 kV the individual phases have sufficient spacing to avoid electrical flashover (short circuit) between the phases, for 500-kV circuits a larger spacing is necessary, thereby requiring replacement with towers designed to support 500 kV. In addition, for 500-kV circuits a greater amount of vertical clearance, between the ground and the conductors, is required than for 220-kV circuits and, as a result, 500-kV towers need to be taller than 220-kV towers. Further, the Project proposes the installation of two 500-kV circuits in Segment 8A, which requires even
taller towers (or the installation of a second set of new parallel towers to carry the second circuit). For 500-kV circuits the conductors are larger and heavier than 220-kV conductors. The existing towers do not have adequate structural strength to carry these larger conductors.

Also, the statement that the Project “proposes to utilize existing towers” in Chino Hills is incorrect. The Project proposes to replace the existing single-circuit 220-kV structures in Chino Hills with new double-circuit 500-kV structures. The statement that this “will overburden the line” in Chino Hills is also incorrect. The proposed conductors have been sized to accommodate projected power flows and the structures have been designed to safely carry the weight of those conductors. Neither the conductors nor the structures will be overburdened. Alternative 4 in Chino Hills would connect with existing 500-kV lines to carry power to the Mira Loma Substation. These lines have the necessary excess capacity to carry the additional power to Mira Loma. These conductors and structures also would not be overburdened.

A.18-11 Your concerns regarding the pulling area and the referenced re-routing of the transmission corridor have been shared with decision-makers at the CPUC. The transmission line was routed along the perimeter of the cemetery at the request of Rose Hills Memorial Park in order to minimize effects on existing grave sites, as well as on future expansion of burial areas on Rose Hills’ property. This re-route largely keeps the transmission lines on Rose Hills’ property, but does result in the placement of transmission structures closer to the property owned by the Sanitation Districts. There are various adverse effects resulting from the proposed re-routing of the transmission corridor in this area that are discussed in the Draft EIR/EIS, including adverse visual impacts (see Section 3.14) and adverse effects on recreational trails (see Section 3.15). Adverse biological impacts on habitat in the western Puente Hills, including lands owned and managed by the Habitat Preservation Authority are discussed in Section 3.4 of the Draft EIR/EIS.

If the proposed Project is approved, the information regarding the pulling area will be shared with SCE for consideration when they undertake final design and engineering to determine if workable alternate locations can be identified.

A.18-12 Thank you for your comment. The Draft EIR/EIS analyzes the proposed Project’s impact to wildlife movement in Section 3.4 In particular, Impact B-4 analyzes the impact of construction activities on wildlife and concludes the impact would be less-than-significant after the implementation of mitigation measures B-1a, B-1b, B-2, B-3a, AQ-1a, and H-1a (Draft EIR/EIS, page 3.4-143). Impact B-6 analyzes whether the project would cause the loss of foraging habitat for wildlife and concludes that the impact would be less-than-significant after the implementation of mitigation measures B-1a, B-1b, B-2, B-3a, AQ-1a, and H-1a (Draft EIR/EIS, page 3.4-147). Impact B-40 analyzes whether the project would interfere with established bird and bat migratory corridors and concludes that the project would have a less-than-significant impact without mitigation (Draft EIR/EIS, page 3.4-230). The Draft EIR/EIS analyzes numerous other impacts to specific special-status species and concludes that no significant and unavoidable impacts would occur. See Table 3.4-27 in the Draft EIR/EIS for a summary of all the impacts and mitigation measures applicable to biological resources. Impacts and mitigation to reduce and avoid impacts to wildlife movement have been adequately analyzed in the Draft EIR/EIS. The Draft EIR/EIS explains, in detail, the access and spur roads that would be needed as part of the proposed Project (Draft EIR/EIS Section 2.2.12.3). The impacts associated with these roads are analyzed in Draft EIR/EIS Sections
3.3 (Air Quality), 3.4 (Biological Resources), 3.13 (Traffic & Transportation), 3.14 (Visual Resources) and 3.15 (Wilderness & Recreation).

A.18-13 Thank you for your comment. As described in Section 2.2 Overview of Alternative 2 the Project would occur primarily within existing SCE easements. In some areas this right of way would be expanded by 100 feet to accommodate the larger towers to comply with safety requirements. Impacts to CDFG lands are not expected to occur as a result of the proposed Project.

A.18-14 Access agreements would be between the utility, as easement holder, and the property owner. If the Project is approved, SCE will negotiate an access agreement with the Habitat Preservation Authority for access to lands owned by the Habitat Preservation Authority as required in connection with the Project. SCE already has certain access rights associated with its existing easement. Your comment will be shared with SCE.

A.18-15 Thank you for your interest in reviewing the Biological Assessment. The Biological Assessment was prepared in accordance with the requirements of the Endangered Species Act (16 U.S.C. §1531 et seq.) and is separate from both NEPA and CEQA requirements. The USDA Forest Service (federal lead agency), the US Army Corps of Engineers (federal cooperating agency), and the CPUC (CEQA lead agency) prepared the Biological Assessment with input from SCE as they hold Applicant Status. The Endangered Species Act does not require public participation on the preparation of the Biological Assessment and, as such, the Forest Service did not distribute the Biological Assessment for public review prior to submittal to the USFWS for formal review. The EIS/EIR contains information sufficient to analyze the potential impacts the project would have on special-status species that may occur in the Project area independent of the Biological Assessment’s conclusions regarding whether the Project is likely to adversely affect species or critical habitat (See Draft EIR/EIS Section 3.4 and Tables 3.4-6 and 3.4-7).

A.18-16 Thank you for your comment. The text has been updated to include the Fish and Game Code Section 3503.

A.18-17 Thank you for your comment regarding APM BIO-1. SCE has proposed a series of APMs to reduce or avoid impacts to sensitive species. These include APMs BIO-1 through BIO-7, described in Table 3.4-16 of the Draft EIR/EIS. Because the Draft EIR/EIS determined that impacts to listed plants would be significant even with implementation of the APMs, Mitigation Measures B-7 (Conduct preconstruction surveys for State and federally Threatened, Endangered, Proposed, Petitioned, and Candidate plants and avoid any located occurrences of listed plants) and B-23 (Preserve off-site habitat/management of existing populations of special-status plants) was included to reduce or avoid impacts to sensitive plant species. Mitigation Measure B-7 requires buffer zones to be placed around any populations of listed plant species identified during preconstruction surveys. (Draft EIR/EIS pages 3.4-152 through 3.4-153.) The California Department of Fish and Game will be involved in the implementation of this mitigation measure, as stated in the Draft EIR/EIS. Mitigation Measure B-23 requires populations of rare plants to be avoided during construction, if feasible. This measure also requires an off-site mitigation ratio of 2:1 for sensitive or special status species if project activities would result in a loss of 10% or more of the known individuals within the population. (Draft EIR/EIS page 3.4-196.) Please see the full text of these mitigation measures in the Draft EIR/EIS on pages 3.4-152 through 3.4-153 and 3.4-196 for more detailed information regarding the protection of sensitive plant species in the
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Project area. Any special status species relocated from the project area would be in compliance with both State and federal law.

A.18-18 The list was generated by making requests to each local jurisdiction for lists of pending or approved projects. The Pacific Heights project was not included in the County of Los Angeles’ response to this request. Therefore, the referenced project was not included in the cumulative projects list. It has been added to the cumulative projects list in the Final EIR. The addition of this Project doesn’t change any of the conclusions in the Draft EIR/EIS regarding cumulative impacts.

A.18-19 Thank you for your comment. The acres for off-site mitigation that were reported in Table 3.4-17 contained typographical errors which have been corrected in the Final EIR, and this Final EIS. A 1:1 ratio for coastal sage scrub has been recommended for areas that do support federally listed species. In areas supporting coastal California gnatcatcher the mitigation ratio has been raised to 3:1.

A.18-20 Thank you for your comment. As described in the Draft EIR/EIS “This habitat is restricted to southern portions of the proposed Project and along the southern border of the ANF. Loss of approximately 14 acres of coast live oak woodland habitat would occur as a result of the proposed Project. This habitat is locally and regionally abundant and only two percent of the approximately 584 acres of coast live oak woodlands mapped within the proposed Project area will be affected. Data compiled from CNDDB lists 289,608 acres of coast live oak woodland habitat as occurring within the State of California (CDFG 1995). Table B (Existing Vegetation Communities within the Preserve) of the Puente Hills Resource Management Plan identifies 211.83 acres of coast live oak woodland within the preserve area. The document recognizes the importance of this habitat and provides mitigation to offset effects to this community at a project level. Cumulative impacts to coast live oak woodland habitat and other native vegetation species are analyzed in Draft EIR/EIS section 3.4.6.2. When combined with past, present, and reasonably foreseeable future project in the area, losses to these plant communities are considered significant and unavoidable. Mitigation measures would be implemented to reduce the impacts to coast live oak woodland habitat, but the impact to this habitat would remain cumulatively significant and unavoidable. (Draft EIR/EIS page 3.4-243.)

A.18-21 Thank you for your comment. Approval of the restoration plan is limited to the Lead Agencies under CEQA and NEPA. Please see response to Comment A.18-2 for further discussion of this issue. Mitigation Measure B-1a requires the FS to prepare a Habitat Restoration and Revegetation Plan for NFS lands and for SCE to prepare a Habitat Restoration and Revegetation Plan for non-Federal lands. Both plans must include seed cutting and collecting guidelines. Mitigation Measure B-1a also specifies that the seed mix for each plan must be approved by the agencies with control over the lands. The seed mix for both plans must consist of native, locally occurring species collected for local seed sources. Mitigation ratios and restoration guidelines have also been specified for public and private lands within the context of Mitigation Measure B-1a. These ratios reflect a number of factors including direction from the Forest Service for mitigating effects to National Forest System lands and complying with land management guidelines identified by the Forest Plan. The measure does provide some flexibility in adjusting mitigation ratios to reflect actual site conditions consistent with requirements that mitigation be proportional to the impact.

A.18-22 The specific weed management mitigation measures identified in the Draft EIR/EIS that are required on National Forest System lands have been requested by the Forest Service in order
to comply with management guidelines identified in the Forest Land Management Plan. While these measures are more stringent on National Forest System lands the Draft EIR/EIS does include best management practices to reduce the spread and colonization of weeds on private lands. These include vehicle washing prior to use in the region and weed monitoring of restoration sites.

A.18-23 Thank you for your comment. Records for California androsace (Androsace elongate ssp. acuta) in Los Angeles County are primarily located within the San Gabriel Mountains, although one record exists approximately 7 miles north of Segment 8. For this reason, Table 3.4-6 has been revised to remove the statement that Segment 8 is outside of the known range of androsace. However, qualified botanists have evaluated the potential for this species to occur along Segment 8 and have determined that likelihood for occurrence is low. Fragrant pitcher sage (Lepechinia fragrans) is known from the San Gabriel and Santa Monica Mountains within Los Angeles County, thus Segment 8 is outside of the known range for this species and no changes to the document have been made for this species.

A.18-24 Thank you for your comment. Table 3.4-6 has been updated with the information you have provided for Catalina mariposa lily (Calochortus catalinae) and Plummer’s mariposa lily (C. plummerae).

A.18-25 Thank you for your comment. The Final EIR and this Final EIS have been updated with this information regarding the occurrence, and potential occurrence of San Diego horned lizard (Phyrmosoma coronatum blainvilli) in Los Angeles County and within Habitat Authority lands. Please see Table 3.4-7.

A.18-26 Thank you for your comment. Table 3.4-7 has been updated to reflect that suitable habitat exists for orange-throated whiptail (Aspidoscelis hyperythrus beldingi) within Segment 8. The presence of coastal western whiptail (Aspidoscelis tigris stejnegeri) within the project area is acknowledged. The Draft EIR/EIS evaluated impacts on federally or State-listed or proposed threatened, endangered, or candidate species as well as Forest Service Sensitive and California Species of Special Concern. Numerous additional watch list and special animals, such as the coastal western whiptail, are likely present within the proposed Project area. Mitigation proposed for special status herpetofauna, which is described under Impact B-27 and includes construction monitoring and the relocation of individuals found within the construction areas, would protect these species, including the coastal western whiptail, if present.

A.18-27 Thank you for your comment. Impacts to the western spadefoot toad (Spea hammondii) and other terrestrial special-status herpetofauna are discussed under Impact B-27 (The Project would result in injury or mortality of, and loss of habitat for, terrestrial California Species of Special Concern and Forest Service Sensitive amphibian and reptile species; pages 3.4-205 through 3.4-207). The analysis of impacts to these species, including western spadefoot, discloses the potential for crushing on access roads and during ground-disturbing activities, as well as general disturbance due to increased human presence. In addition, Impact B-4 (Construction activities, including the use of access roads and helicopter construction, would result in disturbance to wildlife and may result in wildlife mortality) discusses impacts to wildlife related to use of access and spur roads. Mitigation measures would reduce impacts B-4 and B-27 to less than significant (Class II). These impacts are adequately addressed in the Draft EIR/EIS, therefore no changes have been made.
A.18-28 Thank you for your comment. Mitigation Measure B-16 provides protection regarding the detection and avoidance of occupied habitat for coastal California gnatcatcher (Polioptila californica californica). The 300-foot buffer described in the measures is the minimum distance that SCE may approach a nest without concurrence from the USFWS. Please see response to comment A.23-72. In addition, Mitigation Measure B-16 contains the following language regarding the detection of birds “If a territory or nest is confirmed, the FWS shall be notified immediately. In coordination with the FWS a 300-foot disturbance-free buffer shall be established and demarcated by fencing or flagging. This buffer may be adjusted provided noise levels do not exceed 60 dB(A)hourly Leq at the edge of the nest site as determined by a qualified biologist in coordination with a qualified acoustician. If the noise meets or exceeds the 60 dB(A) Leq threshold, or if the biologist determines that the construction activities are disturbing nesting activities, the biologist shall have the authority to halt the construction and shall devise methods to reduce the noise and/or disturbance in the vicinity. This may include methods such as, but not limited to, turning off vehicle engines and other equipment whenever possible to reduce noise, installing a protective noise barrier between the nest site and the construction activities, and working in other areas until the young have fledged. If noise levels still exceed 60 dB(A) Leq hourly at the edge of nesting territories and/or a no-construction buffer cannot be maintained, construction shall be deferred in that area until the nestlings have fledged. All active nests shall be monitored on a weekly basis until the nestlings fledge. No Project activities may occur in these areas unless otherwise authorized by FWS.” To that effect, the Forest Service prepared a Biological Assessment to comply with provisions of the ESA.

A.18-29 Thank you for your comment. The Draft EIR/EIS does indicate the project area is located in critical habitat for this species within the preserve area. The mitigation ratios for permanent loss are inclusive of all critical habitat and not limited to occupied coastal sage scrub. Therefore, direct loss of critical habitat would adequately conserve lands for this species. Temporary habitat loss for this species would be addressed under Mitigation Measure B-1a and include a minimum of 0.5:1 depending on the type of habitat disturbed.

A.18-30 Thank you for your comment. Mitigation Measure B-27 provides specific measures to reduce or avoid effects to sensitive amphibians, such as the western spadefoot toad (Spea hammondii). For example B-27, includes the following language: “The authorized biologist will be present during ground-disturbing activities immediately adjacent to or within habitat that supports populations of the special-status terrestrial herpetofauna. Any special-status terrestrial herpetofauna found within a Project impact area shall be salvaged by the authorized biologist and relocated to suitable habitat outside the impact area. If the installation of exclusion fencing is deemed necessary by the authorized biologist, the authorized biologist will direct the installation of the fence. Clearance surveys for special-status herpetofauna shall be conducted by the authorized biologist prior to the initiation of construction each day.” Therefore, the Draft EIR/EIS provides appropriate mitigation to reduce or avoid effects of the proposed project on sensitive amphibians and reptiles.

A.18-31 Thank you for your comment. The text of Mitigation Measure B-33a and B-33b has been revised to reflect the requested changes.

A.18-32 Thank you for your comment. The Draft EIR/EIS has adequately presented potential effects to bats that occur in the project area. As described in Impact B-34 of the Draft EIR/EIS bats are expected to avoid strikes with transmission lines given that most bat species can use echolocation to discriminate objects as small as 0.4 to 0.004 inch in size (Vaughan and
VAUGHAN, 1986), and the size of guard lines and 500-kV or 220-kV transmission lines are typically equal to or greater than 0.5 inch in diameter (SCE 2007), the frequency of transmission line strikes is expected to be extremely low. Therefore, the number of fatal strikes is still expected to be quite low and insufficient to substantially reduce the number of these species. To date there is little conclusive information pertaining to the effects of EMF on bats. The analysis of these potential effects is too speculative to evaluate (14 Cal. Code Reg. § 15064(d)(3)).

A.18-33 Thank you for your comment regarding the protection of American badger. Existing buffers for this species are adequate to ensure active badger dens are not disturbed during construction. In addition, a 200 foot buffer is required for any maternal dens identified in the project area. Please see Mitigation Measure B-38 for specific language regarding the buffers.

A.18-34 Thank you for your input regarding breeding dates. Currently, CDFG indicates February 1st as the current date to commence nesting bird surveys. Although some birds may nest year round or commence breeding prior to this date the mitigation is considered reasonable and prudent in avoiding or reducing effects to nesting birds. The use of a 500 foot buffer is a guideline only and may not be applicable in the NAF where topographical features may warrant a reduced buffer.

A.18-35 Thank you for your comment. Current guidelines for constructing transmission lines have been developed to minimize the potential effects from bird electrocution. To reduce the effects of the proposed Project, SCE shall implement APMs that require the transmission facilities to be designed to be raptor-safe in accordance with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2006 (APLIC, 2006). Swan wrap, a form of bird flight diverter, if used would occur in limited areas to reduce potential effects to California condor.

A.18-36 Thank you for your comment. The Draft EIR/EIS provides an adequate analysis of potential effects to birds from both collisions and electrocution. These effects are addressed in Impacts B-14, B-20, and B-21. Additional information on bird mortality is included in Appendix B of the Biological Specialist Report [Aspen, 2008], Avian Risk Assessment. Additional studies of avian mortality are not required. Please see responses to Comments A.18-6 and A.18-40. The Draft EIR/EIS acknowledged that birds will collide with the structures; however, mitigation identified under APM BIO-9 would reduce potential effects to birds. Impacts to birds from electrocution and collision would be less than significant; therefore, no additional mitigation is required. In addition, aerial lighting has not been proposed for these structures.

A.18-37 Thank you for your comment. Scientific data regarding the effects of corona noise are extremely limited and the Draft EIR/EIS provided relevant information to address potential effects to wildlife from corona noise. While not presented in the Draft EIR/EIS sensitive wildlife have been observed at many locations along the proposed right of way within the area subject to existing corona noise (Please see section 3.4 Biological Resources of the Final EIS). In the absence of further data the Draft EIR/EIS provides an evaluation of potential effects in compliance with NEPA and CEQA. Please see response to A.18-6. As discussed in Impact B-41, corona noise impacts to wildlife would not be significant; therefore, no additional mitigation is required.

A.18-38 Thank you for your comment. As described in the Draft EIR/EIS, the Project is not expected to result in permanent long term disruption to wildlife movement in the Project area. Right of way expansion does not involve a disruption of habitat. The right of way is obtained to
comply with easement and engineering requirements for the transmission line. Wildlife would still be able to utilize the Powder Canyon area for movement and dispersal. In addition, the Draft EIR/EIS discloses that the project occurs in an SEA. Please see section 3.4.3.3.4, beginning at page 3.4-95. As discussed in Impact B-4, construction related impacts to wildlife movement would not significant. During Project operation, the widely spaced towers would not physically obstruct wildlife movement in the Powder Canyon area. Please see response to comment A.18-37 regarding corona noise. Because impacts would be less than significant, no additional mitigation is required.

A.18-39 Thank you for expressing your concerns regarding the visual impacts of the Project. The Visual Resources section (Section 3.14) of the Draft EIR/EIS analyzes visual effects across the entire Project. The analysis divides the Project into three areas, North, Center, and South, in order to assess the visual impacts the Project would have on the unique landscape of each area. As described in Section 3.14.6, new taller structures in existing ROWs and new tall structures in new or expanded ROWs would create adverse visual effects. These effects are simulated and illustrated in the Draft EIR/EIS Map and Figure Series Volume. For the South Area, visual simulations of the proposed Project and alternatives are found at Figures 3.14-36ab through 3.14-55ab and 3.14-57ab through 3.14-63ab. The Draft EIR/EIS concludes that both the introduction of new transmission lines and the increase in size of existing transmission lines would have a significant and unavoidable impact on visual resources (Section 3.14.6.1.) Your comments have been shared with the CPUC and will be shared with federal decision-makers who are reviewing the Project.

A.18-40 Lead Agencies have the discretion to determine the appropriate way to analyze the project’s environmental impacts (See Laurel Heights Improvement Ass’n v. Regents of Univ. of Cal. (1988) 47 Cal. 3d 376, 409; Association of Irritated Residents v. County of Madera (2003) 107 Cal. App. 4th 1383, 1396). As long as the EIR/EIS is prepared with a sufficient degree of analysis to provide decision-makers with the information needed to make an informed decision concerning the project’s environmental impacts, additional studies, though they may be helpful, are not required (Association of Irritated Residents v. County of Madera (2003) 107 Cal. App. 4th 1383, 1396; CEQA Guidelines §15204 (a); 40 CFR §1502.1). Appropriate locations and an adequate number of KOPs were analyzed to allow the characterization of impacts, the determination of impact significance, and the need for mitigation. Analysis of additional KOPs is not necessary because an adequate number of KOPs have been analyzed to satisfy the requirements of NEPA and CEQA. It is not required or necessary to analyze KOPs for individual properties or for each jurisdiction adjacent to or traversed by the proposed Project, as the selected KOPs provide sufficient information to fully analyze visual impacts of the proposed Project. The Draft EIR/EIS identifies visual Impacts V-1, V-2, V-3, V-4, and V-7 as significant and unavoidable. Visual Impacts V-5 and V-6 are identified as less-than-significant after mitigation. All feasible visual resource mitigation measures have been described in the Draft EIR/EIS.

A.18-41 As noted in Section 3.14-6 of the Draft EIR/EIS (Alternative 2: SCE’s Proposed Project) for Impact V-7 (The Project would conflict with established visual resource management plans or landscape management plans): “Where it is situated along Powder Canyon, the proposed Project would require that the existing ROW be expanded by 100 feet to the south, towards the canyon. In requiring this ROW expansion within the jurisdiction of the PHLHPA, the proposed Project would be subject to the management goals and objectives identified in the PHLHPA RMP. The proposed Project would conflict with Goal Visual-1 and Objective
Visual-1.2 of the Puente Hills Landfill Native Habitat Preservation Authority Resource Management Plan.” The Lead Agencies have determined that “The Project would also conflict with Goal Visual-1 and Objective Visual-1.2 of the Puente Hills Landfill Native Habitat Preservation Authority Resource Management Plan. As such, Impact V-7 would be significant and unavoidable.” No feasible mitigation measures have been identified that would lessen the visual effects of the proposed Project as it relates to Powder Canyon or the Puente Hills Habitat Area.

A.18-42 The Draft EIR/EIS concludes that the proposed taller towers and ridgetop re-location would result in a significant adverse impact on views (see Section 3.14.6.1). As noted in the comment, the proposed realignment would make new towers more visible than the existing towers that they would replace in Segment 8A. Because they are taller, the proposed towers would be visible from locations where the existing towers are currently not visible. Appropriate locations and an adequate number of KOPs were analyzed to allow the characterization of impacts, the determination of impact significance, and the need for mitigation. Analysis of any additional KOPs is unnecessary and an adequate number of KOPs have been analyzed to satisfy the requirements of NEPA and CEQA. Please see the response to Comment A.18-40 for further discussion of this issue.

A.18-43 Thank you for expressing your concerns regarding the visual resource mitigation measures for the Project. SCE will coordinate with all property owners, including PHLNHPA, prior to construction of the Project. The Forest Service encourages SCE and the PHLNHPA to coordinate grading and restoration activities, but the CPUC cannot cede approval authority to the PHLNHPA. Your comments were shared with the CPUC and will be shared with the federal decision-makers who are reviewing the Project.

A.18-44 SCE will coordinate with all property owners, including PHLNHPA, prior to construction of the Project. The Forest Service encourages SCE and the PHLNHPA to coordinate disposal activities, but the CPUC cannot cede approval authority to the PHLNHPA. Your comments were shared with the CPUC and will be shared with the federal decision-makers who are reviewing the Project.

A.18-45 Segment 10 is a new ROW in the Mojave Desert, with an alignment where there are no existing access/spur roads and, therefore, the Draft EIR/EIS finds construction and operation of access and spur roads would have a significant adverse visual effect. Segments 6 and 11 are existing ROWs in the Angeles National Forest, where landforms have steep side-slopes in many areas. Widening existing access roads in these steep slopes can have significant adverse visual effects, and the same is true for re-opening old spur roads or constructing new spur roads to new structures. Landforms along Segment 8A at Rose Hills Memorial Park have more gentle side-slopes, and the new ROW would be located on a relatively flat ridgetop. Therefore, new access and spur roads at this location were determined to be less visually intrusive, as noted in the Draft EIR/EIS, as follows: “Because the landforms are relatively gentle in this location, and because vegetation is generally grasses and low growing shrubs, very little visual contrast would be created.” (Draft EIR/EIS page 3.14-110.)

As shown on the Road Story provided by SCE, preliminary plans indicate that there would be five new spur roads constructed to new structure locations, all from existing access roads along the realigned Segment 8A near Rose Hills Memorial Park, from Str 19 (M44-T2) to Str 26 (M45-T4).
A.18-46 Section 3.14.6 describes the visual effects of the proposed Project. The analysis of Impact V-3 (For a landscape with an existing transmission line, increased structure size and new materials would result in adverse visual effects) states: “Potential visual impacts resulting from the proposed Project’s construction and operation in the South Area (which includes the preserve) would be experienced by thousands of people from a multitude of vantage points, including freeways, highways, collector streets, local streets, county roads, parks, trails, greenways, schools, hospitals, memorial parks, shopping centers, commercial areas, manufacturing areas, and numerous residential neighborhoods. Existing high-voltage transmission line structures are some of the tallest structures in the South Area, and many times these structures are visible against the horizon, towering over rooftops and treetops, or situated along skyline ridges where they are even more visible” (Draft EIR/EIS p. 3.14-104).

Mitigation Measures V-2a, V-2b, V-3a, and V-3b would be implemented to reduce this impact. However, the Draft EIR/EIS concludes that “[w]hile the mitigation measures described above would reduce the effects of Impact V-3 along portions of the Project route, visual impacts to 110th Street West, a Priority 2 Los Angeles County Scenic Highway, as well as the impacts from increased tower heights in the South Area, would remain significant and unavoidable (Class I)” (Draft EIR/EIS p. 3.14-109, emphasis added). As noted in the comment, visual impacts of the Project in this regard would not be less-than-significant, rather, they would be significant and unavoidable.

A.18-47 Thank you for expressing your concerns regarding the visual impacts of the Project as it relates to the PHLNHPA’s RMP Goals and Objectives. Your comments will be shared with federal decision-makers who are reviewing the Project.

A.18-48 Please refer to General Response GR-9 for a discussion of fee-based mitigation programs. In order for fee-based programs to be adequate mitigation, there must be evidence that mitigation will actually result and a connection between the mitigation and the project (Anderson First Coalition v. City of Anderson (2005) 130 Cal. App. 4th 1173). The comment does not provide any evidence that the Habitat Authority’s in-lieu fee program will mitigate significant visual impacts created by the proposed Project. Requiring a project applicant to pay an unspecified amount of money at an unspecified time to fund an unspecified plan is inadequate mitigation under CEQA (See San Franciscans for Reasonable Growth v. City & County of San Francisco (1984) 151 Cal.App.3d 61, 79). Further, the nexus and proportionality between the proposed mitigation and the impacts of the proposed Project is unclear. Therefore, the proposed in-lieu fee program would not be sufficient mitigation and has not been analyzed or incorporated in the Final EIS.

A.18-49 The Schabarum trail or “Juan Bautista De Anza National Historic Trail Recreation Route” is a bicycle trail and recreation route that roughly parallels Segment 8. According to mapping provided by the National Park Service (http://www.nps.gov/juba/), the recreation route is only related to the historic route by name and is not the actual Juan Bautista de Anza trail, which is located between 3 and 8 miles to the south. Thus, the Schabarum Trail is not considered an important historical or cultural resource.

In the TRTP area, NPS depicts the Anza Trail as a corridor slightly more than one mile wide. The corridor intersects the TRTP in two locations: it crosses Segment 7 between M33-T4 and M35-T1 and Segment 11 between M38-T1 and M39-T3. However, there is no data to indicate where the actual trail was located, and since the area currently has intensive urban development the integrity of historical context, feeling, and association has been lost.
Thank you for your review and corrections. Appropriate edits have been made to Section 3.15 (Wilderness and Recreation) of the Final EIS.

Section 3.15.2.1 (Regional Setting) of the Wilderness and Recreation analysis of the Draft EIR/EIS describes that the Puente Hills Landfill Native Habitat Preservation Authority (Habitat Authority) manages a 3,860-acre area designated as the Puente Hills Habitat Area. This section also describes that the Habitat Authority currently owns 1,878 acres of the 3,860-acre Puente Hills Habitat Area, which extends from the intersection of the 605 and 60 Freeways in the west to Harbor Boulevard in the east, including portions of the following, from west to east: Hacienda Hills (City of Hacienda Heights); Turnbull Canyon, Hellman Park, and Arroyo Pescadero (City of Whittier); Sycamore Canyon (Los Angeles County); Powder Canyon (La Habra Heights). Section 3.15.2.2 further describes proximity of the proposed Project to other areas managed by the Habitat Authority, including within Hacienda Heights and as related to the Ahwingna and Coyote Trails.

Section 3.15 (Wilderness and Recreation) of the Draft EIR/EIS provides analysis and discussion of Project impacts that would affect recreational resources, including trails in the Puente Hills Landfill Native Habitat Preservation Authority (PHLNHPA) area. As described in the impact analysis presented in Section 3.15, passive recreation and outdoor enjoyment opportunities in the PHLNHPA, including as related to use of trails along tower access roads and near towers, would be temporarily disrupted during construction activities (Impact R-1), as well as during site-specific maintenance activities (Impact R-2). The exact length of time anticipated for construction activities is currently unknown. Additionally, due to public safety concerns, it is not possible to entirely avoid the need to temporarily close portions of trails during the construction period and, therefore, mitigation to avoid trail closures would be infeasible. However, as part of mitigation measure R-1a, SCE would develop and adhere to construction timetables developed in coordination with all affected resource agencies (Draft EIR/EIS, page 3.15-81). Mitigation Measures R-1a, R-1b, R-1c, and R-1d would reduce impacts to recreation during construction to a less-than-significant level. In the event that a recreational area falls within one-half mile of a construction staging area and must be temporarily closed during construction, SCE will identify alternative recreational areas and post public notices informing recreationists of closures and alternatives. (Draft EIR/EIS, Mitigation Measure R-1b, page 3.15-81.) This documentation will be submitted to the CPUC and FS at least 30 days prior to the start construction activities in that area to ensure the public receives sufficient notice.

Operational and maintenance activities associated with the proposed Project are described in the Draft EIR/EIS in Section 2.2.13 (Operations and Maintenance). The duration of each type of maintenance activity is variable, lasting from minutes (routine inspection) to days or weeks depending on the level of maintenance required. The specific duration and frequency of
operational and maintenance activities at any particular location along the Project route cannot be predicted by SCE with accuracy. As described in Draft EIR/EIS Section 2.2.13, maintenance activities would include periodic inspection of Project infrastructure, as well as repair activities, as needed.

A.18-54 The commenter is correct in noting that Significance Criterion REC2 (identified in Section 3.15 of the EIR/EIS) states that an impact would be considered significant and would require mitigation if it would “Substantially contribute to the long-term loss or degradation of the factors that contribute to the value of federal, State, local, or private recreational facilities or wilderness areas,” and that impacts identified under this significance criterion include effects to federally designated Wilderness Areas, the Pacific Crest National Scenic Trail, OHV trails/Open Riding Areas, and unmanaged recreational uses. The Puente Hills Habitat Area was specifically addressed under Significance Criterion REC1, which states that an impact would be considered significant and would require mitigation if it would “[d]irectly or indirectly disrupt or preclude activities in established federal, State, or local recreation areas or wilderness areas.” The discussion provided under Criterion REC1 acknowledged that the Habitat Preservation Area is a highly valuable and unique recreational resource. It states under Impact R-1, that “the Puente Hills Habitat Area is considered to be particularly sensitive because it encompasses multiple different properties which, as a collective unit, provide extensive open space (3,860 acres) for passive recreation and outdoor enjoyment in an area of Los Angeles County where expanding urban development is encroaching upon remaining open space areas” (Draft EIR/EIS, p. 3.15-80).

In addition, the analysis provided in Section 3.15 addresses both short- and long-term Project impacts to recreational resources and opportunities within the Puente Hills Habitat Area under Impact R-1 (Construction activities would restrict access to or disrupt activities within established recreational areas) and Impact R-2 (Operation and maintenance activities would restrict access to or disrupt activities within established recreational areas), respectively. These impact discussions acknowledge that Project infrastructure would contribute to degradation of the backcountry experience for recreationists within the vicinity of the transmission line route. Mitigation measures have been introduced where implementation of specified actions would reduce the significance of identified impacts. Impacts to visual resources and associated mitigation measures are presented in Section 3.14 of the Draft EIR/EIS, and impacts to noise and associated mitigation measures are presented in Section 3.10 of the Draft EIR/EIS. The analysis presented in Section 3.14 acknowledges that visual impacts related to landscape character and visual quality would significant and unavoidable.

Thank you for submitting your comments and concerns regarding impacts of the Project to recreational resources and opportunities in the Puente Hills Landfill Native Habitat Area. Your comments will be shared with the decision-makers and will be considered when rendering a decision on the Project.

A.18-55 Access agreements would be between the utility, as easement holder, and the property owner. SCE already has certain access rights associated with its existing easement. SCE will negotiate an access agreement with the Habitat Authority, should access to lands owned by the Habitat Authority be required in connection with the project. Your comment will be shared with SCE.

A.18-56 A Policy Consistency Report for the proposed Project and its alternatives was prepared. Please see response to Comment A.23-102 for details on the preparation of this report. With the exception of Objective BIO-3.7, all of the Goals and Objectives referenced in Comment
A.18-56 are analyzed in the Policy Consistency and Plan Amendments Report. The Report concluded that the proposed Project would be consistent with Goal Bio-3, Objective Bio-3.6, and Objective VISUAL 1.3. As stated in the Draft EIR/EIS, the proposed Project would be inconsistent with Goal VISUAL-1 and Objective VISUAL 1.2 (Draft EIR/EIS, page 3.14-117). The proposed Project would be consistent with Objective BIO-3.7. Draft EIR/EIS Section 3.14 (Visual Resources) provides a detailed analysis of the proposed Project’s impacts, including those associated with the Puente Hills Landfill Native Habitat Preservation, and has recommended mitigation measures to reduce all impacts to the maximum extent feasible. Under Criterion VIS-1, the proposed Project would have a significant impact if it would “have a substantial adverse effect on the existing landscape character and visual quality of the site and its surroundings” (Draft EIR/EIS, page 3.14-89). Objective BIO-3.7, which is to minimize potential edge effects of urban development, falls under the analysis of Criterion VIS-1. As discussed in the Draft EIR/EIS, all feasible mitigation measures would be implemented to reduce the project’s impact on the existing landscape character and visual site quality. Though Impact V-3 would remain significant and unavoidable in the South Area, all feasible steps would be taken to mitigate adverse changes to the landscape (Draft EIR/EIS, pages 3.14-94 through 3.14-109). As such, the proposed Project would be consistent with this Objective. However, please note that while the Habitat Authority’s Management Resource Management Plan was considered in the Draft EIR/EIS analysis, the Plan is not legally applicable to the proposed Project as only the CPUC has regulatory authority over the Project on non-federal lands unless those lands are administered by other State agencies with authority similar to the CPUC.
Comment Set A.19: City of El Monte

April 6, 2009

John Boccio/Justin Seastrand  
CPUC/USDA Forest Service  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, Ca 91301


Dear Mr. Boccio and/or Mr. Seastrand:

Thank you for the opportunity to comment on the above referenced project. The City of El Monte is submitting comments specific to the portion of Segment 7 that is located between mile posts 6 and 11.

El Monte Residential Neighborhoods: At approximately 260 feet tall, it is anticipated that the new towers will become prominently visible at the street level to more areas of the City along the City’s eastern limits and will significantly degrade the community’s eastern views. Within this segment of the alignment, the existing SCE right-of-way (ROW) is located about 1000 to 1400 feet to the east paralleling the City of El Monte’s eastern border across the San Gabriel River and traverses in a north-south direction. According to Figure 2.2-23a and 2.2-23b of the Draft EIR/S, the transmission lines are currently supported by 3 parallel rows of towers within the ROW. The towers are of varying heights with the maximum being about 150 feet from grade and are generally grouped within 24 clusters along the City’s eastern border at approximately 1,000 feet intervals. The proposal will replace the two lower towers within each cluster with a new tower which will reach approximately 260 high. Land uses within the City along the eastern City limits consist primarily of single-story low density and medium density residential homes as well as public and institutional uses. City Staff conducted a visual line-of-sight evaluation along the City’s eastern border and concluded that residential neighborhoods within 3,000 feet of the ROW currently have limited visibility of the existing towers; the visibility of the structures become more prominent for properties approaching the western riverbank. At various locations that have an open view to the river, the line of sight is even further west. The proposed height will increase the visibility and the prominence of the utility towers for the eastern El Monte viewed.

Envision El Monte General Plan Update and The Emerald Necklace Vision Plan: Directly abutting the SCE ROW alignment, users of the Emerald Necklace will be directly impacted by the proposal. The proposed project will increase the visibility and the prominence of man-made utility structures and will compete with efforts to restore and protect native habitat and landscaping that sustains plants and wildlife species along the banks of the San Gabriel River. The City of El Monte has taken a leadership role in creating a comprehensive plan for the creation of the Emerald Necklace, and is now in the first phases of implementing the policies and programs necessary to bring this plan to fruition. Working
Comment Set A.19, continued: City of El Monte

with a consortium of adjacent municipalities, state and federal agencies, and non-profit organizations, El Monte has put together a team of dedicated stakeholders and member agencies that are committed to increasing access to the Emerald Necklace. The vision is to create a 17-mile loop of parks and greenways connecting 16 cities and more than 500,000 residents along the Rio Hondo and San Gabriel Rivers and their tributaries. This Plan proposes a world-class parks network that will create parks, recreational opportunities, natural habitat, and multiuse trails, and seeks to restore and protect native habitat and landscaping that sustains plants and wildlife species along the banks of rivers, lakes, and washes within the Emerald Necklace. The City has championed this effort by preparing and signing the Emerald Necklace Vision Plan for other cities to adopt in order to work in a collective manner toward the goals of the plan and has also prominently integrated the vision for the Emerald Necklace into the Land Use, Circulation, Park and Open Space, and other various elements of the draft updated General Plan soon to be completed. Goal 3 of the Draft Parks and Open Space Element of the El Monte General Plan articulates as follows: An Emerald Necklace that encircles the community with parks and multiuse biking, walking, and equestrian trails, restores open space and habitat, protects the watershed, and provides multiple recreational and health benefits.

The City of El Monte believes that the proposed project has the potential to create significant adverse impacts to the local eastern viewshed, and is also not consistent with the efforts to restore the San Gabriel River as articulated in the Emerald Necklace Vision Plan and with the various draft elements of the update to the El Monte General Plan. Additional mitigation measures are necessary and need to be incorporated into the project proposal to specifically address the visual and aesthetic impacts to the community and the goals of restoring open space and habitats along the San Gabriel River and implementing the Emerald Necklace Vision Plan.

If I can be of any further assistance, or if you have any questions regarding this matter, please feel free to call me at (626) 256-8626.

Best regards,

Minh Thai
Planning Services Manager

xc: James Mussenden, City Manager
Kev Tcharkhoutian, Deputy City Manager for Community Development/City Engineer
David Gondel, Senior Deputy City Attorney

Sent Via USPS to the above address, via fax at (888) 331-9897, and via Email at trtp@aspeneg.com.
Response to Comment Set A.19: City of El Monte

A.19-1 and A.19-2

The Forest Service does not have jurisdiction for the portion of the Project that traversed the City of El Monte; however, federal decision makers are aware of the City’s concerns. A more detailed response to these comments are provided in the Final EIR, but are not discussed further in this Final EIS.
Comment Set A.20: City of La Habra Heights

CITY OF LA HABRA HEIGHTS
1245 N. Hacienda Road
La Habra Heights, CA 90631
(562) 694-6302
www.lhbcity.org

April 6, 2009

SENT VIA U.S. MAIL
SENT VIA E-MAIL TO TRTP@aspeneg.com
SENT VIA FAX TO (888) 331-5897

Mr. John Boccio
California Public Utilities Commission/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Dear Mr. Boccio:

The City of La Habra Heights (City) submits this letter in response to the Draft Environmental Impact Report and Environmental Impact Statement (Draft EIR/EIS) for Southern California Edison’s (SCE) proposed Tehachapi Transmission Line Project (Proposed Project), which borders the City’s northern boundary. The City is extremely concerned about the inadequacy of the Draft EIR/EIS document. Inadequacies include lack of photo simulations of towers impacting La Habra Heights; documentation errors related to towers located in the City; unmitigated health and safety risks to abutting residential lots; and disregard for the City’s environmental resources. The City opposes the Proposed Project. The City urges the California Public Utility Commission (CPUC) to incorporate mitigation measures that are acceptable to the City within the Final EIR/EIS prior to the project being scheduled for a public hearing. Concerns are as follows:

I. Draft EIR/EIS Errors

The Draft EIR/EIS Site Maps for Segment 8A Mile Posts (MP) 9 to 11.2 are incorrect on Figure 2.2-34 and Figure 2.2-35 in the Draft EIR/EIS Volume 1 of 4. Figure 2.2-34 shows two parallel transmission towers that run from MP 9-9.5. Field observations indicate that these two parallel towers actually run to approximately MP 10.5. Figure 2.2-35 needs to be amended to reflect the parallel towers from MP 9.5-10.5. It is critical that SCE correct these errors and provide the City with an accurate representation of the Proposed Project.
Comment Set A.20, continued: City of La Habra Heights

City of La Habra Heights
SCE Tehachapi Project – Draft EIR/EIS Comments
April 6, 2009
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II. Health and Safety Impacts

The Proposed Project will negatively impact the health and safety of the City’s residents, particularly on Casalero Drive. An existing transmission tower at approximately MP 10.5 sits less than 50 feet from the single family residence, and less than 500 feet from an additional four homes in the surrounding neighborhood. Construction and operation of the towers will significantly impact the quality of life of these residences, due to noise and dust. La Habra Heights is a rural canyon community with two-way, 20-foot wide streets and steep grade. There are no discussions as to how SCE will mitigate these construction and operation impacts. The City urges SCE to bypass improvement of this particular tower at MP 10.5.

Additionally, the City is within a Very High Fire Hazard Severity Zone. With its high winds and canyon topography, fires within the City could have a devastating impact on the entire region. While the Draft EIR/EIS discusses reductions in fire hazards through increased height of the proposed transmission lines, staff could not find a discussion on the potential catastrophic impact of the higher voltage these new lines will carry. It is critical that the final EIR/EIS discuss and address the impacts of higher voltage.

III. Environmental Impacts

The Tehachapi Project will change the face of the City’s largest recreation and open space area, Powder Canyon, which provides outdoor recreation opportunities to the entire Puente Hills region. The City echoes comments made by the Puente Hills Landfill Native Habitat Preservation Authority and urges CPUC to require SCE to maintain the existing towers along Segment 8A through La Habra Heights, or propose mitigation measures that are acceptable to the City and the Habitat Authority.

Throughout the open space area, SCE’s proposed design adds an additional tower, increasing the footprint of the existing utility footprint by 100 feet and potentially harming many flora and fauna species. Further, tower heights will more than double throughout the open space area, increasing the risk of avian mortality due to wire collisions. The Habitat Authority predicts a permanent increase in the annual bird mortality rate due to collisions, especially during migrations.

The plan also creates a new right-of-way through Powder Canyon, disturbing a presently untouched vista.

The plan creates environmental impacts that are inconsistent with the following policies of the City’s General Plan Environmental Resource Management Element:
Comment Set A.20, continued: City of La Habra Heights

City of La Habra Heights
SCE Tehachapi Project – Draft EIR/EIS Comments
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Policy 11. Protect existing wildlife habitats through the preservation of open space.

Policy 12. Future development should have minimal adverse impacts on the environment and natural topography, and should not affect natural surroundings, including ridgelines, more than necessary to allow an economically viable use of privately held land.

Policy 14. Establish and enforce mitigation measures for projects that have the potential for significant or irreversible adverse environmental effects.

The plan will significantly and irreversibly impact the City’s environment and the quality of life of residents throughout the region who frequent Powder Canyon. Staff could not identify a discussion in the Draft EIR/EIS regarding impacts to Powder Canyon trail usage and preservation of this native habitat.

IV. Noise Impacts

Noise during construction and the ongoing operation of much larger towers will significantly impact the City, especially homes on Casadere Drive at approximately MP 10.5. These impacts must be mitigated. Also, noise within Powder Canyon will further disrupt many species that traverse the hills along the transmission line corridor. The Draft EIR/EIS must address and identify these impacts more adequately.

V. Aesthetics/Visual Impacts

The Proposed Project will create significant visual impacts throughout the City, with new and replacement lattice towers rising twice as high as existing towers. Plans include the addition of a third tower in cases where two exist, as well as 100-feet of new right-of-way through the City. Transmission line construction is proposed along a significant stretch of open space area in the City (Powder Canyon). Powder Canyon is an important recreational and natural resource for La Habra Heights and the entire Puente Hills region.

The visual impacts of the Proposed Project are inconsistent with the following goals of the City’s General Plan Environmental Resource Management Element:

Goal 2. Minimize alteration to the natural terrain.

Goal 3. Preserve scenic views.
Comment Set A.20, continued: City of La Habra Heights

City of La Habra Heights
SCE Tehachapi Project – Draft EIR/EIS Comments
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Page 4

Additionally, the Draft EIR/EIS provides no photo simulations of transmission tower impacts on La Habra Heights. The City urges CPUC to provide these to the City and give the City the same courtesies that have been provided to other jurisdictions impacted by the Proposed Project.

The City of La Habra Heights urges further mitigation be proposed and presented to City staff for review and acceptance prior to the Final EIR/EIS being schedule for a public hearing. The City appreciates your consideration. If you have any questions, please contact Kenneth Phung, City Planner, at 562-694-6302.

Sincerely,

Brian Bergman
Council Member

Stan Carroll
Council Member
Response to Comment Set A.20: City of La Habra Heights

A.20-1 The cross-section figures provided in the Draft EIR/EIS are intended to be representative of the general structure configurations along portions of the proposed Project alignment. These figures, provided by SCE, do not account for every structure variation along the 173 miles of the proposed Project alignment. Furthermore, as discussed in Chapter 2 of the Draft EIR/EIS, all mileages are approximate due to differences between engineering miles, which take into account topography, and map miles, which assume no variation in topography. The level of detailed provided in the Draft EIR/EIS is sufficient to determine the impacts of the proposed Project and the alternatives. Furthermore, the requested changes would not result in a change in impacts identified within the EIR/EIS. Please see the response to Comment A.18-6 for information on the level of detail presented in the EIR/EIS.

A.20-2 Draft EIR/EIS Section 3.9 (Land Use) addresses the proposed Project’s impacts on residential uses during both construction and operation (Impact L-1 and L-3, respectively). Mitigation measures have been recommended to reduce identified impacts to a level that is less than significant. Additionally, Draft EIR/EIS Section 3.12 (Socioeconomics) addresses impacts related to quality of life. The proposed Project’s impacts related to traffic and transportation (Draft EIR/EIS Section 3.13) can be minimized through mitigation, although construction-related impacts to air quality (Draft EIR/EIS Section 3.3) and noise (Draft EIR/EIS Section 3.10) would still exceed regional thresholds. With regard to traffic, operation of the proposed Project would require periodic inspection and maintenance, which would involve one or two vehicles traveling the project ROW once per year, which is not expected to result in adverse traffic-related impacts (road closures, roadway congestions, etc.). Section 3.10 of the EIR/EIS identifies operation of the Project would result in unavoidable adverse noise impacts for which no feasible mitigation measures are available. As provided in Draft EIR/EIS Section 3.16 (Wildfire Prevention and Suppression), at a Project-specific level Impact F-3 (Construction and/or maintenance activities would increase the risk of wildfire) and Impact F-5 (Presence of the overhead transmission line would increase the risk of wildfire and compromise firefighter safety) would be adverse (although not significant under CEQA); however, cumulative fire risk impacts would be adverse and unavoidable. As addressed in Draft EIR/EIS Section 3.17( Electrical Interference and Hazards), impacts related to the proposed Project’s ability to cause induced currents and shock hazards in joint use corridors (Impact EIH-2) would be adverse but can be minimized through mitigation. The City of La Habra Heights’ concerns related to the proposed Project’s direct, indirect and cumulative adverse effects on public health and safety, and its request to bypass improvements in the vicinity of the tower located at Segment 8A, Mile Post 10.5 will be shared with decision-makers.

A.20-3 The voltage of the line has no bearing on the risk of wildfire ignitions except insofar as the ground and vegetation clearance requirements and structural integrity of tower and conductor design are more stringent as voltage increases. Such factors are discussed in greater detail in the Draft EIR/EIS Section 3.16 pages 3.16-9, 3.16-10, 3.16-18, and 3.16-19.

A.20-4 Comment letter references “Powder Canyon” which is located in Draft EIR/EIS “Map and Figure Series Volume” Figure 2.2-1w approximate to Segment 8A Mileposts (MP) 11 to 14. Draft EIR/EIS Figure 2.2-35 through 39 display the existing 220-kV structures and associated
transmission lines in the approximate vicinity of Powder Canyon along with the proposed Project structures. Section 3.15.2.1 (Regional Setting) of the Wilderness and Recreation analysis of the EIR/EIS describes the Puente Hills Landfill Native Habitat Preservation Area, including as specifically relevant to Powder Canyon in La Habra Heights. Table 3.15-17 (South Region Recreational Resources within One-Half Mile of Alternative 2) identifies the proximity of Project components to Powder Canyon, including recreational trails in the Powder Canyon area, and the associated discussion provided in Section 3.15.2.2 of the EIR/EIS discusses recreational resources and opportunities available in the Powder Canyon area. Additionally, Table 3.15-31 (Wilderness and Recreation Impacts Applicable to Resources in the South Region) identifies Project impacts that would affect recreational resources and opportunities in Powder Canyon, and the impact analysis provided in Section 3.15.6.1 (Direct and Indirect Effects Analysis) discusses how Wilderness and Recreation impacts of the Project would affect Powder Canyon during construction (Impact R-1: Construction activities would restrict access to or disrupt activities within established recreational areas) and during operations and maintenance activities (Impact R-2: Operation and maintenance activities would restrict access to or disrupt activities within established recreational areas). Mitigation measures are also presented in Section 3.15.6.1 to reduce Project impacts, including as relevant to Powder Canyon.

Impacts to Biological Resources are addressed in Draft EIR/EIS Section 3.4. Regarding bird mortality, the Draft EIR/EIS provides an adequate analysis of potential effects to birds from both collisions and electrocution. These effects are addressed in Impacts B-14, B-20 and B-21. Additional information on bird mortality is included in Appendix B of the Biological Specialist Report [Aspen, 2008], Avian Risk Assessment. Additional studies of avian mortality are not required. Please see the responses to Comments A.18-6 and A.18-40. The Draft EIR/EIS acknowledges that birds will collide with the structures; however, mitigation identified under APM BIO-9 would reduce potential effects to birds. Mitigation measures are not needed to reduce impacts to birds from electrocution and collision. In addition, aerial lighting has not been proposed, nor would it be required for these structures.

Impacts to Visual Resources are addressed in Draft EIR/EIS Section 3.14. To clarify ROW improvements in the vicinity of Powder Canyon: the proposed Project would require a 100-foot-wide expansion of the existing utility corridor in this area. Where it is situated along Powder Canyon, the proposed Project would require that the existing ROW be expanded by 100 feet to the south, towards the canyon. In requiring this ROW expansion within the jurisdiction of the Puente Hills Landfill Native Habitat Preservation Authority (PHLNHPA), the proposed Project would be subject to the management goals and objectives identified in the PHLNHPA Resource Management Plan (RMP). As discussed under Impact V-7 (The Project would conflict with established visual resource management plans or landscape conservation plans), presented in Section 3.14 (Visual Resources) of the EIR/EIS, the proposed Project would conflict with Goal Visual-1 and Objective Visual-1.2 of the PHLNHPA RMP, resulting in a significant and unavoidable (Class I) impact to visual resources. As described in Section 3.14.6, new taller structures in existing ROWs and new tall structures in new or expanded ROWs would create adverse visual effects, which are simulated and illustrated in the Draft EIR/EIS Map and Figure Series Volume. The visual resources analysis presented in the EIR/EIS concludes that both the introduction of new
transmission lines and the increase in size of existing transmission lines would have an unavoidable adverse impact on visual resources (Section 3.14.6.1).

As discussed in Section 3.9.3.2 of the Draft EIR/EIS, under the CPUC’s General Order Number 131-D, Section XIV(B), the CPUC has preemptive jurisdiction over the construction, design, and operation of public utilities within the State, and no local discretionary permits are required for the proposed Project or its alternatives. Existing land uses and General Plan Land Use Designations are displayed in Draft EIR/EIS “Map and Figures Series Volume” Figures 3.9-3h and 3.9-4h, respectively. Land use consistency with the City of Chino Hills General Plan and the Puente Hills Landfill Native Habitat Preservation Authority Resource Management Plan are discussed in greater detail in Section 3.9 of the Draft EIR/EIS. Table 3.9-20 (Consistency with Applicable Land Use Plans and Policies – Proposed Project) describes that the proposed Project would be consistent with the City of Chino Hills General Plan (adopted September 1994), as well as the Puente Hills Landfill Native Habitat Preservation Authority Resource Management Plan (June 2007). The Draft EIR/EIS was been prepared consistent with NEPA which requires mitigation measures to minimize impacts when feasible (See 40 CFR §§ 1502.14 and 1502.16).” All concerns regarding General Plan policy consistency will be shared with and considered by decision makers. Please note that the Forest Service does not have jurisdiction over those portions of the Project that are not located on National Forest System lands.

Draft EIR/EIS Table 3.10-9 indicates that construction activities associated with the proposed Project (Alternative 2) would not be in compliance with City of La Habra Heights Municipal Code Noise Ordinance pertaining to the 65 dBA threshold between the hours of 7 a.m. and 7 p.m. As discussed in Draft EIR/EIS Section 3.10 (Noise), Impact N-1 and N-2 for Alternative 2, construction noise to residential receptors (including those near the Alternative 2 ROW in the City of La Habra Heights) would be adversely affected by temporary construction noise. As indicated in Draft EIR/EIS Section 3.10 (Noise), SCE will implement APMs to reduce the effects of construction noise on sensitive receptors during construction: NOI-1 (Limit Hours and Days for Construction), NOI-3 (Advance Notification), and NOI-4 (Establish Toll Free Number). To further reduce noise impacts from stationary construction equipment, Mitigation Measure N-1a (Implement Best Management Practices for construction noise) and Mitigation Measure N-1b (Avoid sensitive receptors during mobile construction equipment use) is also required in order to reduce construction noise impacts to sensitive receptors to the maximum extent feasible. Although construction noise would be temporary and would be reduced by implementation of APMs NOI-1, NOI-3, and NOI-4, and Mitigation Measures N-1a (Implement Best Management Practices for construction noise) and N-1b (Avoid sensitive receptors during mobile construction equipment use), the level of construction noise would be substantially higher than ambient noise and would disturb sensitive receptors.

The effects of noise on wildlife (including those in Powder Canyon) are addressed in Draft EIR/EIS Section 3.4, Biological Resources, Impacts B-4, B-5 B-6, B-9, B-10, B-14, B-15, B-16, B-18, B-29, B-30, B-31, B-33, B-36, B-37, B-38, and B-41.

Visual impacts are addressed in Draft EIR/EIS Section 3.14. As described in the Draft EIR/EIS in Section 3.14.6.1, for Impact V-7 (The Project would conflict with established visual resource management plans or landscape conservation goals), “The proposed Project
would cross through lands managed by the PHLHPA along Segment 8A and would run along the northern border of Powder Canyon, which falls under the authority of the PHLHPA. Where it is situated along Powder Canyon, the proposed Project would require that the existing ROW be expanded by 100 feet to the south, towards the canyon. The proposed Project would conflict with Goal Visual-1 and Objective Visual-1.2 of the Puente Hills Landfill Native Habitat Preservation Authority Resource Management Plan.” “Goal 3: Preserve scenic views” from the City of La Habra Heights’ General Plan is listed in the Visual Resources Specialist Report (Table C-3, Local Laws, Regulations, and Standards – Visual Resources) along with ”Goal 4. Preserve existing water courses, scenic beauty, mature trees, and vegetation.” In addition, Policies 31, 33, and 34 are listed and quoted in this Table. Section 3.14 of the Draft EIR/EIS was prepared based on the information provided in this Visual Resources Specialist Report. As such, the City of La Habra Heights’ General Plan was taken into account for the Draft EIR/EIS. Furthermore, the Draft EIR/EIS has been prepared consistent with NEPA, which requires mitigation measures to minimize impacts when feasible (40 CFR §§ 1502.14 and 1502.16).

The City has not indicated what further mitigation is needed. Feasible mitigation measures have been proposed for adverse impacts identified in the Draft EIR/EIS. In some cases, feasible mitigation is not available to fully avoid impacts. If the City has recommendations for additional feasible mitigation measures, the City present should present those measures.
Comment Set A.21: City of Irwindale

April 2, 2009

John Boccio/Justin Seastrand
CPUC/USDA Forest Service
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA  91301


Dear Mssrs. Boccio and Seastrand:

On behalf of the City of Irwindale, I would like to again express our appreciations to the California Public Utilities Commission and the USDA Forest Service for providing the opportunity to submit comments on the subject matter. The City of Irwindale is most particularly interested in the planned Segment 7 portion of the TRTP. Further appreciations are extended for permitting input and further discussion of the TRTP and the scope of impacts to our City at the past State and Local Government meeting in Downtown Los Angeles, the Public Scoping meeting in Duarte, the NOP Process, the March Webcast, and the Public Meeting in Pasadena.

The City recognizes that power needs are great throughout the State and the use of renewable sources to fulfill said needs is for the furtherance of desirable environmental quality and to serve the booming customer base. In providing such service to a growing San Gabriel Valley in Los Angeles County, there exists a need for balancing future transmission of power with local economies and standards for environmental quality.

As mentioned in the past noted opportunities identified above, I have raised comments related to quality of life, environmental sensitivity and economic development issues that the City of Irwindale would like maintain discussion with the governing agencies and Southern California Edison. In response to the Draft EIR/EIS documents, the following comments are provided:
Comment Set A.21, continued: City of Irwindale

John Boccio/Justin Seastrand
April 2, 2009
Page 2 of 2

1. Cumulative Projects - Irwindale projects contained in Tables 2.9-4 and 2.9-12 need updating. Please contact City Planning staff at (626) 430-2208. The U.S. Army Corp of Engineers should provide current information regarding the proposed Kare Youth League Sports Park in the Santa Fe Basin within the City of Irwindale, as identified in Table 2.9-6.

2. The options for greater use of undergrounding lines should be further explored for another Section 7 and there should be further analysis for site perimeter locations of smaller lines to potentially create viable and developable landscapes that are more aesthetically pleasing;

3. The effects of the long-term maintenance of intensified transmission lines on potential redevelopment of local sites that could promote the achievement of the community’s long-term economic development and quality of life goals should be discussed in the document, pursuant to Section 15131 of the California Environmental Quality Act (CEQA);

4. The effects of the long-term maintenance of intensified transmission lines on the establishment of quality interim land uses within proximate large Edison-owned sites that could promote the achievement of incidental community short-term economic development and quality of life goals should be discussed in the document, pursuant to Section 15131 of CEQA;

5. In an effort to create win-win opportunities, the City of Irwindale and Edison must continue to maintain land use/land development discussions on potential options of land swapping, relocation, and operations consolidation in order to maximize development potential.

Please continue to keep the City of Irwindale apprized on any other updates on the TRTP. If you have any questions, I can be reached at (626) 430-2207.

Sincerely,

Ray Hamada
Director of Planning & Community Development

C: Robert Griego, City Manager
   Elisa Clifford, SCE Region Manager
Response to Comment Set A.21: City of Irwindale

A.21-1 Staff of the City of Irwindale’s Planning Department was contacted in response to this comment on April 21, 2009. The information needed to update the tables referenced in Comment A.21-1 has been received, and Tables 2.9-4, 2.9-6 and 2.9-12 of the Draft EIR/EIS have been updated accordingly. Thank you for your assistance.

A.21-2 “A reasonable range of alternatives to SCE’s proposed Project (Alternative 2) have been developed and analyzed as part of the EIR/EIS process. As described in the Alternatives Screening Report, located in Appendix A of the EIR/EIS, alternatives were evaluated using the NEPA and CEQA criteria defined in Section 2.3 of the Alternatives Screening Report. One of these criteria is to consider alternatives capable of addressing significant environmental issues. The undergrounding and/or relocation of smaller lines to “site perimeter locations” in Segment 7 would not reduce or eliminate any of the impacts related to the Project, and in fact would result in greater environmental impacts due to the additional construction activities involved to remove and relocate additional lines that otherwise would be unaffected under SCE’s proposed Project. Therefore, this potential alternative will not be further developed and has been eliminated from further consideration in the EIR/EIS.

It is recommended that the City of Irwindale work directly with SCE to ensure your requests for changes to SCE’s existing system are considered.

A.21-3 Under NEPA, an EIS is required to evaluate the social and economic effects of a project if they are related to effects on the natural or physical environment. Section 3.12.3 discusses five “Issues of Concern” were identified for evaluation, including: population and housing; quality of life; employment; private property value; local business revenue; and, public revenue. Although the socioeconomic impact analysis does not explicitly address redevelopment or the possibility of interim land uses that could foster a community’s short- or long-term economic development, it does address the proposed Project’s potential to: affect property values along the Project alignment (Impact S-1); decrease revenues for agricultural landowners (Impact S-2); and, affect public agency revenues. The socioeconomic analysis appropriately addresses economic and quality of life impacts of the proposed Project.

A.21-4 Thank you for your review and comment. Your concerns regarding continued coordination will be given to the federal decision makers.
Comment Set A.22: County Sanitation Districts of Los Angeles County

The Puente Hills Landfill (PHLF) has been owned and operated by the County Sanitation Districts of Los Angeles County (Districts) since 1970. The 1,365-acre site is located immediately southeast of the intersection of the San Gabriel Valley (I-605) Freeway and the Pomona (SR-60) Freeway in unincorporated Los Angeles County. This site is adjacent to Segment 8A of the proposed Project.

The staff of the County Sanitation Districts of Los Angeles County (Districts) appreciates the opportunity to comment on the Draft EIR/EIS for the Tehachapi Renewable Transmission Project (Project). Please include the following comments, along with associated responses, in the Final EIR/EIS.

PHLF Impacts/Concerns

Geotechnical Concerns

The existing alignment from Workman Mill Road to the Nike Hill upper reclaimed water storage tank overlies an area that is believed to be within or near an ancient landslide. Installation of new towers along this alignment (Structures 16 through 20) may cause additional instability in these areas although it may not directly impact landfill property.

The proposed alignment calls for the installation of new towers for the 500kV lines on the ridge south of the upper water tank (Structure 20). The Project also includes the proposed construction of an access road across the face of this slope. The slope in this area is eroding and unstable; the Districts have immediate plans for repair. The additional active and passive soil loads from the new towers were not included in the design of the slope repair, nor was any consideration given to the construction of an access road. Therefore, SCE will need to submit the proposed design and construction schedule associated with this location to the Districts for review and approval and mitigate any impacts to Districts' facilities.

The proposed Project calls for the construction of new turnkey towers within close proximity to the PHLF boundary (Structure 21). This location is adjacent to composite lined slopes and refuse fill areas that were approved subject to regulatory oversight from the Los Angeles Regional Water Quality
Comment Set A.22, continued: County Sanitation Districts of Los Angeles County

Control Board and state regulations, including the conditions for the stability of these slopes. The location of towers in this area appear to impose additional unanticipated active and passive soil loads on the composite lined slope, and therefore may impact the liner system and slope stability for this portion of the landfill. Therefore, SCE will need to submit the proposed design and construction schedule associated with this location to the Districts for review and approval and mitigate any impacts to Districts constructed facilities.

**Site Access**

SCE may require access to portions of PHLF in order to construct new towers and pull the new power lines; namely, in the vicinity of Structure 21. SCE will need to coordinate access along existing easements and obtain temporary construction easements on PHLF property where needed to minimize the impacts to Districts operations. SCE will also need to protect the aboveground environmental control systems in these areas. Methods of protection should be submitted to the Districts for review and approval.

Construction will likely interfere with public use of Skyline Trail. SCE will need to minimize closures of the trail to reduce impacts to recreational use. Adequate public notice and consultation with the Los Angeles County Department of Public Works should be conducted. Districts utilities (e.g., reclaimed water, power and communications), including those on Rose Hills’ property and those that lie beneath the access road/horse trail must be protected from damage during construction.

**Habitat Authority: Impacts/Concerns**

The Districts own a portion of the land within the Habitat Authority’s jurisdiction, and serve on the Board of Directors for the Habitat Authority. Therefore, the Districts share the Habitat Authority’s concerns regarding the Project. (Please refer to the Habitat Authority’s letters dated July 26, 2007, September 27, 2007, and April 2, 2009.) These concerns include the following:

- No project alternatives have been presented in the Habitat Authority area, as opposed to other sensitive locations, such as Chino Hills.
- Mitigation measures on Habitat Authority lands should be same as the mitigation measures on National Forest Service lands.
- The project will cause significant visual impacts for which no mitigation has been proposed.
- County Schabarum Trail (Skyline Trail) runs underneath or directly near the project throughout Habitat Authority land.
- Tubular steel poles are desired throughout the Project area, rather than lattice towers.
- Potential loss and/or fragmentation of habitat due to creation of new service roads and installation of new towers.
- There are concerns regarding differing assessments of multiple species of plants and wildlife in the Project area.

**Other Concerns**

After the PHLF scheduled closure date of October 31, 2013, the site will be ultimately dedicated for park and recreational use, the specifics of which will be the subject of future planning between the surrounding community and the Los Angeles County Department of Parks and Recreation. The proposed Project will have aesthetic impacts on the recreational use of the landfill after closure; these impacts should be mitigated.
Comment Set A.22, continued: County Sanitation Districts of Los Angeles County

CPUC / USDA

Proposed new 500kV towers near the upper reclaimed water storage tank (Structure 20) may block communications towers and a repeater tower located on Nike Hill. Owners of concern include: LA County, Verizon Wireless, SCE, Southern California Rapid Transit District, and Trillion Partners. SCE should coordinate proposed design and construction with the affected owners so that it does not impact the existing communications systems.

If you have additional questions or concerns, please contact the undersigned at (562) 908-4288, extension 2734.

Very truly yours,

Stephen R. Maguin

Debra Bogdanoff
Senior Engineer
Facilities Planning Department

DB:mh

cc: Andrea Gullo, Puente Hills Landfill Native Habitat Preservation Authority
Response to Comment Set A.22: County Sanitation Districts of Los Angeles County

A.22-1 Thank you for your comments. The Forest Service understands your concern related to slope stability issues adjacent to and along the PHLF property. Text has been added to Mitigation Measure G-3 that requires coordination with the County Sanitation Districts of Los Angeles County regarding known slope stability issues at and adjacent to the PHLF, and also requires submission of the slope stability and landslide surveys, including recommendations for support and protection measures to the County Sanitation Districts for review prior to final project design. The Puente Hills Landfill is in proximity to the proposed Project in Segment 8A. Please see Draft EIR/EIS “Map and Figure Series Volume” Figure 2.2-1v Segment 8A Mileposts (MP) 4.5 to 7. Please note that the Forest Service does not have jurisdiction for those portions of the Project that are not located on National Forest System lands.

A.22-2 Thank you for this information. The Forest Service agrees that SCE should coordinate construction access with the County Sanitation Districts of LA County and obtain temporary easement as necessary, as well as protect the aboveground environmental control systems in these areas.

A.22-3 Project construction activities and construction-related access restrictions that would affect public use of Skyline Trail are assessed under Impact R-1 (Construction activities would restrict access to or disrupt activities within established recreational areas), and mitigation measures are introduced in Section 3.15.6.1 to minimize such impacts, including as applicable to Skyline Trail. Section 3.11 (Public Services and Utilities) assesses how Project activities would have the potential to affect utilities and utility infrastructure, and includes mitigation measures to reduce such impacts.

A.22-4 Consistent with NEPA and CEQA, the Draft EIR/EIS analyzes a range of reasonable alternatives. A total of 31 potential alternatives to SCE’s proposed Project were initially considered for evaluation in the EIR/EIS, of which seven were carried forward for detailed analysis in the EIR/EIS. Suggestions for alternatives were provided by public agencies and the public during the scoping period for the EIR/EIS (August-October 2007). While some of these requests were detailed enough to generate viable alternatives, others lacked specificity and instead only suggested that some other alternative must be possible. It was also determined that some suggestions were better suited for consideration as mitigation measures within the EIR/EIS. For various reasons, these suggestions did not lead to the development of viable alternatives and, therefore, could not be included in the screening process. Furthermore, the Draft EIR/EIS is not required to address an alternative for every segment of the route. Below is a list of concepts for alternatives brought up during the scoping period that did not result in the formulation of potential alternatives. For a complete description of these concepts, please see Appendix A of this EIR/EIS.

- Avoid Impacts to Habitat Authority Properties
- Avoid Parklands, Public Open Space, and Recreation Areas
- Reduce New ROW Width West of Mira Loma Substation
- Use Existing Corridors
- Rowland Heights Water District Detour
- Chino Hills 500-kV Split
• Use Tubular Steel Poles
• Match Existing Structure Heights
• Solar Power

A.22-5 Thank you for your comment. Mitigation ratios on National Forest System lands were developed and proposed by the Forest Service to comply with Forest Plan Objectives. Your comments will be shared with federal decision-makers who are reviewing the Project. Please note that the Forest Service does not have jurisdiction for those portions of the Project that are not located on National Forest System lands.

A.22-6 Visual impacts of the proposed Project have been analyzed and appropriate mitigation measures for adverse impacts have been included in the EIR/EIS. Temporary construction impacts to visual resources can be minimized, but cannot be completely avoided. Mitigation Measure V-1 is included and addresses construction-related impacts. Visual impacts from operation of the Project are addressed in Impacts V-2 through V-7. Impacts V-5 and V-6 would be reduced with the implementation of proposed mitigation measures. Impacts V-2, V-3, V-4, and V-7 would remain adverse and unavoidable, even with mitigation. Mitigation Measures V-2a, V-2b, V-2c, V-3a, V-3b, V-4a, V-4b, V-4c, and V-4d have been included to address operational visual impacts. Please see Section 3.14 of the Final EIR/EIS for greater detail.

A.22-7 Section 3.15 (Wilderness and Recreation) of the EIR/EIS describes that within the Puente Hills Habitat Area, most of the Schabarum Trail is currently situated within and adjacent to the existing utility ROW and, as such, the proposed Project route would traverse Schabarum Trail multiple times along Segment 8, between approximately Mile 3.3 and Mile 13.58 (within the Puente Hills Habitat Area). Section 3.15 also describes Project impacts that would affect Schabarum Trail, such as temporary access restrictions during the construction period, and identifies mitigation measures that would minimize Project impacts.

A.22-8 Thank you for indicating your preference for tubular steel poles. Your comment will be shared with federal decision-makers who are reviewing the Project.

A.22-9 The effects of tower and road construction on species and their habitats are discussed throughout Draft EIR/EIS Section 3.4.6 (see discussions of Impacts B-1 through B-42). Detailed discussion on impacts of roads is discussed in this same section under Impact B-4 under the subheading “Access and Spur Roads.”

A.22-10 Thank you for your comment. The comment provided does not indicate what concerns are present or how differing assessments do not accurately assess Project impacts. No change to the EIR/EIS has been made.

A.22-11 NEPA require analysis of impacts to existing conditions, which were addressed in the Draft EIR/EIS (40 CFR §§ 1508.14, 1502.15). Cumulative impacts are analyzed in Chapter 3 of the EIR/EIS, including cumulative impacts associated with Wilderness/Recreation and Visual Resources impacts that would have the potential to affect future projects of the County Sanitation Districts of Los Angeles County and the Los Angeles County Department of Parks and Recreation. Mitigation measures for cumulative impacts are introduced where the implementation of such measures would reduce the Project’s contribution to cumulative impacts. Please see Sections 3.14 (Visual Resources) and 3.15 (Wilderness and Recreation)
for discussions of cumulative impacts relevant to those environmental issue areas. Furthermore, Mitigation Measure L-4 (Consult with federal, State, and local agencies) would require SCE to consult with all federal, State, and local agencies to address and reconcile any future potential conflicts with land management practices.

A.22-12 Thank you for this information. Impacts associated with Electrical Interference are discussed in Section 3.17 of the Draft EIR/EIS. As discussed in the EIR/EIS (Section 3.17.6.1), transmission lines can sometimes cause interference with communications equipment, but such impacts can be avoided or corrected. Mitigation Measures E1H-1a (Limit the conductor surface gradient) and Mitigation Measure E1H-1b (Document and resolve electronic interference complaints) have been included in the Draft EIR/EIS.

The Forest Service agrees that SCE should coordinate with the owners of communication facilities to ensure that the proposed Project does not interfere with these facilities. This information will be shared with SCE.
Comment Set A.23: Goodin, MacBride, Squeri, Day & Lamprey, LLP

GOODIN, MACBRIE,
SQUERI, DAY & LAMPREY, LLP
Attorneys at Law

April 6, 2009

Jeanne B. Armstrong

John Boccio / Justin Seastrand
CPUC / USDA Forest Service
C/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

Re: Comments on the Draft Environmental Impact Report

Dear Mssrs. Boccio and Seastrand:

In accord with the February 13, 2009, Notice of Availability of Draft Environmental Impact Report/Statement ("DEIR/EIS") on Southern California Edison Company’s (SCE) Tehachapi Renewable Transmission Project ("TRTP" or the "Project"), the City of Chino Hills (the "City" or "Chino Hills") submits the following comments.

Chino Hill’s significant interest in Segment 8A of the Project has been made known from the commencement of SCE’s regulatory process to achieve approval of the Project. As proposed (and as now selected in the DEIR/EIS as the environmentally superior route), Segment 8A will follow an existing 150 foot SCE right-of-way through the City for approximately five miles, three miles of which is densely populated residential neighborhoods. Specifically, there are over 1000 homes which would be within 500 feet of the proposed transmission lines. The City has attempted to work, at considerable cost, for over eighteen months with all relevant stakeholders in this process—e.g., SCE, the Commission, State Parks and Recreation—to fashion viable alternatives which would allow the Project to go forward in a timely manner, while protecting the health, safety and welfare of the residents of Chino Hills.

Unfortunately the DEIR/EIS fails to reflect such efforts. To the contrary, the DEIR/EIS chooses SCE’s proposed route (including that for Segment 8A), rejecting the alternatives which the City proffered for Segment 8A by failing to assess all relevant information, erroneously dismissing other significant data, or by simply failing to account for the true impacts of the Project. As will be demonstrated by these comments the pervasive errors in the DEIR/EIS, as such pertain to the assessment of Segment 8A of the project and the alternatives thereto, have resulted in an incorrect overall finding of environmental superiority.
Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

John Boccio/Justin Seastrand
CPUC / USDA Forest Service
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Page 2.

Since the issuance of the DEIR/EIS, the City has continued its efforts to reach out to impacted stakeholders in an effort to come to a solution that works for everyone. This effort has resulted in obtaining the endorsement of Hills For Everyone - a non-profit organization dedicated to preserving open space in the Puente – Chino Hills region of southern California--for Alternative 4C (with slight modifications as described in these comments) as the preferred environmental alternative. Given that the creation, expansion, and preservation of the Chino Hills State Park (“CHSP” or “Park”) is viewed as one of the most important goals the organization, its support for Alternative 4C should be given significant weight in the Commission’s assessment of this Alternative.

For purposes of organization, these comments will be divided into two sections. The first section, with accompanying attachments, will address Alternative 4C, with the modifications, proffered by Hills for Everyone. This section will illustrate that these modifications do not present environmental impacts which have not already been studied and addressed in the DEIR/EIS. At the same time, these modifications meet or exceed the environmental benefits provided by Alternative 4C as presented in the DEIR/EIS. As such the modifications do not rise to the level of significance which would necessitate a recirculation of the DEIR/EIS under the California Environmental Quality Act (CEQA) Guidelines.

The second section will provide a detailed analysis of the DEIR/EIS. Through the comments in this section, Chino Hills will illustrate that the DEIR/EIS is rife with deficiencies and inaccuracies, which renders it noncompliant with CEQA and results in the erroneous selection of the SCE’s Proposed Route for Segment 8A of the Project as the “environmentally superior” route. In concert with such, Chino Hills will illustrate that proper analysis would have lead to the selection of Alternative 4C.

Correcting the deficiencies in the DEIR/EIS’ analysis of the Project and correcting the errors in the analysis of Alternative 4C results in the selection of Alternative 4C as environmentally superior.
Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

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Finally, Chino Hills notes that, as referenced above, it is continuing to engage in ongoing discussions with stakeholders regarding the appropriate solution for the Project route as such transverses Chino Hills. In this regard, Chino Hills reserves the right to submit supplemental comments on the DEIR/EIS to reflect the status and results of such ongoing discussions.

Very truly yours,

GOODIN, MACBRIDE,  
SQUERI, DAY & LAMPREY, LLP

By 
Counsel for the City of Chino Hills

cc: Carol Brown (advisor to Commissioner Peevey)  
Matthew Deal (advisor to Commissioner Peevey)  
Lindsey Brown (advisor to Commissioner Bohn)  
Traci Bone (advisor to Commissioner Grueneich)  
Pam Natoloni (advisor to Commissioner Chong)  
Paul Phillips (advisor to Commissioner Simon)  
Service List, A.07-06-031
Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

SECTION 1

COMMENTS ON ALTERNATIVE 4C (modified)
Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

COMMENTS ON ALTERNATIVE 4C (modified)

The City of Chino Hills has worked diligently for over eighteen months to devise an alternative to the proposed route for Southern California Edison Company’s Tehachapi Renewable Transmission Project as that Project traverses the City of Chino Hills. This alternative was important to the City because SCE’s proposed route would have 195 foot towers carrying 500 kV transmission lines running less than 75 feet from hundreds of residential properties in the City. Thus, the City presented what was designated in the DEIR/DEIS as Alternatives 4A through D. These various alternatives were provided to the California Public Utilities Commission (CPUC) and its environmental consultant by the City over a period of time as it continued its discussions with various stakeholders. The City’s primary proposal, however, rests with Alternative 4C. As will be addressed in the second section of these comments, if a proper analysis of this alternative would have occurred as part of the DEIR/DEIS process, it would have led to the selection of Alternative 4C as the environmentally superior alternative.

Since the issuance of the DEIR/DEIS on February 13, 2009, the City has continued its efforts to reach out to interested stakeholders to craft a solution which will work for all. This effort resulted in a recommendation by Hills for Everyone (HFE) to slightly modify City proposed Alternative 4C to further mitigate the environmental impact on the Chino Hills State Park (CHSP). The City agrees with HFE’s recommended modifications.

Alternative 4C (modified) is a feasible project alternative that further improves on Alternative 4C. Given the small degree of deviation from Alternative 4C, as described below, Alternative 4C (modified) falls within the area of potential impact analyzed in the DEIR/DEIS. The modifications are not significant new information that would necessitate a recirculation of the DEIR under the California Environmental Quality Act (CEQA) Guidelines.

Description of Alternative 4C (modified)

The main feature of the modified Alternative 4C compared to the original Chino Hills Alternative 4C is that the 500-kV gas-insulated switching station will be moved approximately 2500 feet NW from its proposed DEIR location (approximately 0.4 miles to the west and approximately 0.2 miles to the north). Relocation of the switching station will avoid impacting sensitive habitat areas that are within the Chino Hills State Park (CHSP) sphere of influence (the CHSP ecosystem). The transmission lines that interconnect into or come close to the switching station per original Alternative 4C will be reconfigured to some extent to (a) account for the relocation of the switching station, (b) make maximum use of the existing transmission corridors within the CHSP, and (c) further mitigate the impact of transmission re-route within the CHSP.

In brief, the transmission line reconfigurations from the original Alternative 4C fall into three categories. First, the Mira Loma-Vincent and Mira Loma-Walnut/Olinda transmission lines to the west of the switching station will be moved slightly to the north in a few places and

1 See Detailed Complete Description of Alternative 4C (modified) and associated map, appended hereto as Section 1, Attachment 1.
Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

made shorter to account for the new location of the switching station and to lessen the visual impacts in the CHSP. Second, the re-routed Serrano-Lugo/Mira Loma and Mira Loma-Walnut/Olinda transmission lines will be redirected on the east side of the switching station to travel south (rather than northeast) into the CHSP and then connect with the existing SCE transmission corridor south of the Raptor Ridge in the CHSP. Third, the re-routed Serrano-Lugo/Mira Loma 500-kV transmission lines will be built in double-circuit configuration (rather than a single circuit as was set forth in Alternative 4C) within the CHSP in order to reduce their right-of-way needs in the park.

Comments on Alternative 4C (modified)

Benefits of Alternative 4C (modified)

The benefits of Alternative 4C for the Chino Hills State Park have been presented by the City to CPUC previously. Such benefits include removing a significant stretch of 220 kV transmission lines from the CHSP to a location outside the park. It should be noted that Chino Hills State Park currently has 25 miles of transmission lines that cross its 13,800-acre area, including 10.5 miles of inactive transmission lines. Alternative 4C (modified) would add 3.5 miles of new lines within the CHSP, but as proposed by the City of Chino Hills, 15.8 of the existing active and inactive (5.3 miles of existing active and 10.5 miles of inactive) transmission lines would be removed, resulting in a net of 12.7 miles of transmission lines remaining in the Park – a significant reduction.

In addition to the net reduction in lines, Alternative 4C also relocates a portion of the existing 500 kV line within CHSP to a route on the sides of the hills within the park, instead of the ridge tops where the line runs today. This latter change will make the transmission lines less visible from many locations throughout the park, and will also remove all transmission facilities from the Water Canyon Natural Preserve, which is one of the most sensitive habitat zones within the CHSP.

Alternative 4C (modified) offers additional benefits from those associated with Alternative 4C as the relocation of the switching station allows it to avoid impacting sensitive habitat areas that are within the CHSP sphere of influence (ecosystem). Moreover, by moving certain of the lines to the west of the switching station slightly to the north, as called for Alternative 4C (modified), their visual impact is lessened. Finally, the reroute of the lines from the east side of the switching stations allows for the use of an existing SCE transmission corridor, in line with the CPUC’s policy of favoring the use of existing corridors.

No Amendment to Chino Hills State Park General Plan is Necessary

As set forth in detail in the second section of these comments, the City challenges the finding in the DEIR/EIS that implementation of proposed Alternative 4C would require an amendment to the Chino Hills State Park General Plan. To the contrary, Alternative 4C results in an incremental reduction of transmission facilities within the boundaries of the CHSP and further lessens the overall impact of utility infrastructure on the Park, by reducing the visibility of existing and new transmission lines, and removing towers and lines from some of the most
Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

sensitive habitat zones within the Park. As explained above the modifications to Alternative 4C, further add to the beneficial impacts of the Alternative. As a result, Alternative 4C (modified) is consistent with the goals and objectives of the General Plan of CIISP, and no amendment to the Plan will be necessary to effect its implementation.

Alternative 4C (modified) will have No Hazardous Materials Impacts

Out an abundance of caution, the City presented the Alternative C (modified) to its technical consultant, Parsons Engineering, to determine whether the slight modification to the route would alter its previous determination regard an absence of contamination resulting in potentially significant hazards and hazardous materials impacts. The result was a determination that “it is highly unlikely that there are any MEC [munitions and explosives of concern] items on the surface or in the subsurface of the corridor.”

Comparison of Alternative 4C (modified) with Proposed Project and Alternative 4C

Chino Hills has compared modified Alternative C with SCE’s Project and with Alternative 4C as presented in the DEIR/EIS with respect to new infrastructure required and potential environmental impacts. As illustrated in the chart below, with respect to the section of the project which traverses Chino Hills, Alternative 4C (modified) will result in approximately 11 less miles of transmission line, 70 less transmission structures, 55 less sub-transmission structures, and will result in a net 2 miles of transmission lines removed from the Park. Alternative 4C (modified) also will result in less environmental impacts than the Project, and slightly less than Alternative 4C, making Alternative 4C (modified) the Superior Alternative.

<table>
<thead>
<tr>
<th>Category</th>
<th>Alternative 2 (SCE Proposed)</th>
<th>Alternative 4C (per DEIR/EIS)</th>
<th>Alternative 4C* (modified)</th>
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<tbody>
<tr>
<td>Overall Project Impact:</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Total length of 500-kV and 220-kV T/L (miles)</td>
<td>172.9</td>
<td>163</td>
<td>158.5</td>
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<tr>
<td>Total Number of new transmission structures</td>
<td>853</td>
<td>802</td>
<td>794</td>
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<tr>
<td>Total disturbance during construction</td>
<td>1538 (+/-15%)</td>
<td>1567 (+/-15%)</td>
<td>1400 (+/-15%)*</td>
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</table>

2 See April 2, 2009 Letter from Michael Short of Parsons Engineering to Mark Hensley, Attorney for the City of Chino Hills, appended hereto as Section 1, Attachment 2.
### Comparison of Environmental Issues of Project (Alternative 2), Alternative 4C and Alternative 4D (modified)

<table>
<thead>
<tr>
<th>(acres)</th>
<th>Total permanent disturbance (acres)</th>
<th>277 (+/-15%)</th>
<th>287 (+/-15%)</th>
<th>270 (+/-15%)³</th>
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<tbody>
<tr>
<td><strong>Segment 8 Impact:</strong></td>
<td></td>
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<tr>
<td>Segment 8A/8C</td>
<td></td>
<td>33.0</td>
<td>22.7</td>
<td>22.0</td>
</tr>
<tr>
<td>(d-c 500-kV T/L) (miles)</td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Segment 8B</td>
<td></td>
<td>6.8</td>
<td>None</td>
<td>None</td>
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<tr>
<td>(d-c 500-kV T/L) (miles)</td>
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<tr>
<td>Distance of the new ROW (miles)</td>
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<td>4.4</td>
<td>13.25</td>
<td>9.9</td>
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<tr>
<td>Existing transmission line to be removed</td>
<td>Various 220-kV T/L structures</td>
<td>Various 220-kV T/L structures</td>
<td>Various 220-kV and 500-kV T/L structures</td>
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<tr>
<td>Number of new transmission structures</td>
<td></td>
<td>226</td>
<td>175</td>
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<tr>
<td>Number of new sub-transmission structures</td>
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<td>(d-c 66 kV LWSPs)</td>
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<td>Components within CHSP</td>
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<td></td>
<td>• 3.1-mile T/L;</td>
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</tr>
<tr>
<td></td>
<td>• 25 single-circuit 500-kV structures</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>• 5 to 7 double-circuit 220-kV structures;</td>
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</tr>
<tr>
<td></td>
<td>• Remove 25 existing 220/500-kV structures</td>
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<td></td>
</tr>
<tr>
<td></td>
<td>• Net 0.6 miles of 500-kV T/L removed from CHSP</td>
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<tr>
<td></td>
<td>• Net 1.2 miles of 220-kV T/L removed from CHSP</td>
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<td>• Net five (5) 500-kV structures added to CHSP</td>
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<tr>
<td></td>
<td>• Net three (3) 220-kV structures removed from CHSP</td>
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### Issue/Resource Area:

A.23-12, cont.
# Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

<table>
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<tr>
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<td><strong>Agricultural Resources</strong></td>
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<td><strong>Comparison to Project [1]</strong></td>
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<tr>
<td><strong>Comparison to Seg. 8A Alternatives [2]</strong></td>
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<td><strong>Air Quality</strong></td>
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<td><strong>Comparison to Project</strong></td>
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<tr>
<td><strong>Comparison to Seg. 8A Alternatives</strong></td>
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<tr>
<td><strong>Biological Resources</strong></td>
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<td><strong>Comparison to Project</strong></td>
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<tr>
<td><strong>Comparison to Seg. 8A Alternatives</strong></td>
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<td><strong>Cultural Resources</strong></td>
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<td><strong>Comparison to Project</strong></td>
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<tr>
<td><strong>Comparison to Seg. 8A</strong></td>
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**Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP**

<table>
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<tr>
<td></td>
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<tr>
<td><strong>Alternatives</strong></td>
</tr>
<tr>
<td><strong>Environmental Contamination &amp; Hazards</strong></td>
</tr>
<tr>
<td>Minors to moderate soil and ground water contamination</td>
</tr>
<tr>
<td>Superior to Project; less towers, transmission lines and EMF exposure to sensitive receptors</td>
</tr>
<tr>
<td>Same as Alternative 4C</td>
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<tr>
<td>Comparison to Project</td>
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<tr>
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<td>Comparison to Seg.8A Alternatives</td>
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<tr>
<td>Geology, Soils and Paleontology</td>
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<tr>
<td>Minor to moderate impacts due to seismic occurrence, erosion and slope instability</td>
</tr>
<tr>
<td>Similar to Project; potentially impacts can be mitigated.</td>
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<tr>
<td>Same as Alternative 4C</td>
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<tr>
<td>Comparison to Project</td>
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<tr>
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<tr>
<td>Comparison to Seg.8A Alternatives</td>
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<td>1</td>
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<tr>
<td>Hydrology and Water Quality</td>
</tr>
<tr>
<td>Streams crossed; minor to moderate impacts to water quality, ground water, erosion and flooding</td>
</tr>
<tr>
<td>Similar to Project, Less streams crossed</td>
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<tr>
<td>Same as Alternative 4C</td>
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<tr>
<td>Comparison to Project</td>
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<tr>
<td>Land Use</td>
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<tr>
<td>Disturb existing residential land uses along Segment 8; conflict with local general plan policies</td>
</tr>
<tr>
<td>Superior to Project, reduced conflicts with Segment 8A land uses and with local general plans</td>
</tr>
<tr>
<td>Same as Alternative 4C; no CHSP General Plan amendment required</td>
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<tr>
<td>Comparison to Project</td>
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</table>

A.23-12, cont.
### APPENDIX F. DRAFT EIR/EIS COMMENTS AND RESPONSES

Tehachapi Renewable Transmission Project

#### Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

| Comparison of Environmental Issues of Project (Alternative 2), Alternative 4C and Alternative 4C (modified) |
|-------------------------------------------------|-------------------------------------------------|-------------------------------------------------|
| Alternatives                                 | Noise                                           | Public Services and Utilities                     |
|                                                | Significant construction and operational noise  | Minor to moderate impacts; some                   |
|                                                | impacts to sensitive land uses                  | interference with emergency aircraft              |
|                                                | Superior to Project; reduced noise impacts to   | services and the flow of utility systems         |
|                                                | Segment 8A residents                            | Similar to Project; less interference with public |
|                                                |                                                 | service and utilities systems in Chino and         |
|                                                |                                                 | Ontario; interference with Chino Hills services   |
|                                                |                                                 | not substantiated                                 |
| Comparison to Project                         | +                                               | o                                                |
| Comparison to Seg. 8A Alternatives            | 1                                               | 1                                                |
| Socioeconomics                                | Significant disruption to existing residential  | Superior to Project; no socio-economic impacts    |
|                                                | and nonresidential properties within and        | expected                                          |
|                                                | adjacent to the ROW, resulting in significant   |                                                 |
|                                                | physical changes and socioeconomic changes      |                                                 |
|                                                | caused by fear of lower risks and EMF, and      |                                                 |
|                                                | loss of property value                          |                                                 |
| Comparison to Project                         | +                                               | +                                                |
| Comparison to Seg. 8A Alternatives            | 1                                               | 1                                                |
| Traffic and Transportation                    | Substantial construction traffic; with mitigation, | Similar to Project; fewer roads affected          |
|                                                | less than significant                           | Same as Alternative 4C                           |

A.23-12, cont.
## Comparison of Environmental Issues of Project (Alternative 2), Alternative 4C and Alternative 4D (modified)

<table>
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<tr>
<th></th>
<th>Comparison to Project</th>
<th>Comparison to Seg.8A Alternatives</th>
<th>Visual Resources</th>
<th>Comparison to Project</th>
<th>Comparison to Seg.8A Alternatives</th>
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<td><strong>Comparison to Project</strong></td>
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<td><strong>Comparison to Seg.8A Alternatives</strong></td>
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<td><strong>Wilderness and Recreation</strong></td>
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<td><strong>Wildfire Preservation and Suppression</strong></td>
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<td><strong>Comparison to Project</strong></td>
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<tr>
<td><strong>Comparison to Seg.8A Alternatives</strong></td>
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<td><strong>Electrical Interferences and Hazards</strong></td>
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</table>

Goodin, MacBride, Squeri, Day & Lamprey, LLP

Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP
Comment Set A.23, continued: Goodin, MacBride, Squeri, Day & Lamprey, LLP

| Comparison of Environmental Issues of Project (Alternative 2), Alternative 4C and Alternative 4C (modified) |
|-------------------------------------------------|----------|----------|
| Comparison to Project                          | +        | +        |
| Comparison to Seg.8A Alternatives              | 2        | 1        |
| TOTALS                                         | 18       | 14       |
| Number of +, indicating “Superior to the Project” | 9        | 9        |
| Ranking among Seg.* alternatives              | 2        | 1        |

Notes:

[1] Comparison to Project: “+” indicates superior to the project; “0” similar to the project; “−” inferior to the project.

[2] Comparison to Seg.8A Alternatives: Alternative 4C modified is ranked against Alternative 4C on a scale from “1” to “2”, “1” being the best. Where the alternatives are comparable, they are grouped together and assigned the same numerical ranking.

* Estimates and subject to further detailed engineering analysis
LSTs of the existing 500-kV single-circuit transmission lines will be permanently removed from the CHSP (approximately 3.4 miles of 500-kV single-circuit transmission lines).

A portion of the existing 220-kV transmission lines within CHSP will also be re-routed as part of this alternative. This will also take 7 of the existing 220-kV transmission lines from the CHSP, all from ridge tops. Beginning approximately 0.3 miles northwest of the CHSP boundary (outside of CHSP), the existing 220-kV double-circuit structures will be re-routed away from the CHSP to parallel the new Mira Loma-Vincent 500-kV transmission line (Segment 8A) structures north of the CHSP boundary for about 0.9 miles and then northeast for 0.2 miles to the new switching station (approximately 1.1 miles in total to the switching station). As noted earlier, the new ROW for the entire 1.1 miles will be approximately 300-feet wide to accommodate the 500-kV double-circuit and 220-kV double-circuit structures. The 220-kV transmission line will continue past the switching station (will not enter the station), and then turns southwest right after the switching station parallelizing the re-routed Serrano-Lugo/Mira Loma 500-kV double-circuit transmission lines for approximately 0.2 mile to the boundary of CHSP. At this point, the re-routed 220-kV transmission line will enter CHSP in a southern direction and travel for approximately 0.1 miles inside the CHSP before turning east. For these 0.3 miles, the 220-kV transmission line will be within the 500 ft ROW mentioned above. The eastward travel of the 220-kV transmission line is about 0.6 miles and makes the line reconnect with the existing 220-kV double-circuit structure within the CHSP just south of the Raptor Ridge. To complete the approximately 1.7-mile 220-kV re-route, approximately 10 new double-circuit 220-kV LSTs will be required (approximately 4 will be within CHSP. Approximately 7 existing 220-kV double-circuit LSTs will no longer be constructed within Segment 8. The undergrounding of 60-kV circuits in Chino will also be saved.

As a result of this alternative, no upgrades will occur in Segment 8A between S8A MP 19.2 and 35.2 (16 miles) through Chino Hills, Chino, and Ontario. Upgrades to the existing Chino-Mira Loma No. 1, 2, and 3 220-kV transmission lines in Segments 8B and 8C built with Segment 8A) as well potential expansion of the Mira Loma Substation will also not occur. Consequently, approximately 78 double-circuit 500-kV structures, 18 LSTs and 60 Tubular Steel Towers (TSTs) and approximately 40 double-circuit 220-kV structures (associated with the re-build of Chino-Mira Loma No. 3) will no longer be constructed within Segment 8. The undergrounding of 60-kV circuits in Chino will also be saved.

DETAIL DESCRIPTION OF ALTERNATIVE 4C (modified)\(^1\)

For Alternative 4C (modified), Segment 8A will deviate from the SCE proposed route beginning about two miles east of State Route 57 (approximately S8A MP 19.2), where the existing Mira Loma-Walnut/Olinda 220-kV double-circuit transmission line and the existing unenergized Chino-Mesa transmission line separate from one another. At that point, the new Mira Loma-Vincent 500-kV transmission line will turn southeast, and remain parallel and south of the existing Mira Loma-Walnut/Olinda 220-kV double-circuit transmission line up to 0.3 miles before the Chino Hill State Park (CHSP) boundary (approximately 3.9 miles). Along this portion of the alignment, approximately 150 feet of additional ROW will be required to accommodate the new 500-kV double-circuit structures. At this point, the alternative route will turn east along a new approximately 300 foot-wide ROW for approximately 0.9 miles, which will remain north of the CHSP boundary to a point where it will turn northeast and travel for about 0.2 miles into a new 500-kV gas-insulated switching station. Approximately 17 double-circuit 500-kV Lattice Steel Structures (LSTs) will be required for this approximately 5.0 mile re-route to the new switching station. The two existing Serrano-Lugo/Mira Loma 500-kV single-circuit transmission lines located within CHSP will be re-routed to allow them to loop into the new switching station, which will be a minimum of 4 to 5 acres in size, allowing for power to be transferred along the existing 500-kV transmission lines to Mira Loma Substation. As part of this reroute, the existing 500-kV single-circuit transmission lines and structures will be removed from the environmentally sensitive Water Canyon Natural Preserve and nine (9) 500-kV single-circuit structures will be permanently removed from the CHSP. The re-routed 500-kV transmission lines will be double-circuit and all its structures will be placed at lower elevations and away from the CHSP ridge tops wherever possible. For the gas-insulated switching station, the entire system will be enclosed in a sheet metal building, which will require an air conditioning system. The building would be approximately 42-feet high, and the dead-end structures on either side of the building would be approximately 65-feet high, and located next to an access road.

Approximately 3.2 miles of new ROW will be required to re-route the double-circuit 500-kV transmission lines in and out of the new switching station. The new north-south re-route into the switching station (1.7 miles, of which 1.5 miles will be within CHSP) will require an approximately 280-foot wide ROW to accommodate the one 500-kV double-circuit structures going north towards the switching station for the first 1.3 miles. The next 0.2 miles will also be south-north but within a 500 ft ROW within the CHSP. The last 0.2 miles of the line will travel northeast into the switching station outside the CHSP and will also be placed within a 500 ft ROW. The 500 ft ROW for the last 0.4 miles of this transmission line is to accommodate this as well as other rerouted transmission lines as will be explained below. The re-route of the 500-kV double-circuit transmission line will continue starting from the new switching station and will proceed southwest for about 0.2 miles (outside the CHSP) and then south into the CHSP for about 0.2 miles of the 500 ft ROW mentioned earlier. At this point the line will turn eastward and travels about 1.1 miles, within a 200 ft ROW, to reconnect to the existing two 500-kV single-circuit structures in the CHSP just south of the raptor ridge. To complete the two re-routes of the 500-kV transmission lines (approximately 3.2 miles in total) will require approximately 18 new 500-kV double-circuit LSTs (approximately 14 within CHSP and 4 outside CHSP). As noted earlier, approximately 9

\(^1\) This reflects a description of Alternative 4C with the changes necessitated by the movement of the switching station 2500 feet NW and the changes to the transmission line configuration to (a) account for the relocation of the switching station, (b) make maximum use of the existing transmission corridors within the CHSP, and (c) further mitigate the impact of transmission re-route within the CHSP.
Section 1, Attachment 2

Jenkins & Hogin, LLP
ATTN: Mr. Mark Hensley
Manhattan Towers
1230 Rosecrans Avenue, Suite 100
Manhattan Beach, CA 90266

Subject: Analysis of Alternative Route 4C (modified)

Mr. Hensley,

I have reviewed existing documents to determine if there is a potential hazard related to the installation of the subject switching station and transmission lines. The primary reference used in the review was the Geomatrix Consultants Inc. Conceptual Site Model (CSM) for Munitions and Explosives of Concern (MEC), for the Aerojet Chino Hills Property dated August 24, 2006. The proposed Alternative Route 4C (modified) is in a choice location for the virtual elimination of any ordnance related hazardous components.

The proposed Alternative Route 4C (modified) effecting the re-routed 220KV and new 500KV transmission lines (assuming a 250-foot corridor), as shown in Exhibit 1, which run from the switching station through the southern portion of the Aerojet property and adjoining leased areas, do not travel through any area that has been found to be contaminated with MEC. This includes the re-routed 500KV line that runs from the south, through the Chino Hills State Park, to the switching station. The lone exception is the path of the re-routed 220KV and re-routed 500KV transmission lines that run from the Bonnett property through the McDermont property connecting with the switching station. The McDermont property portion, which the transmission lines will travel through, was swept and cleared and a number of small items were encountered i.e., fragmentation and one 30mm Target Practice (TP) cartridge. Neither of the items contains any reactive components, therefore the area is not considered to be hazardous. Based on the fact that the area has been previously cleared and that the items encountered posed no hazard, there is no need to re-sweep the area.

Figures 3, 5, 7 and 9, and Plates 1 and 2 of the referenced report best illustrate the relationship of the MEC areas with the effected properties and the location of the Alternative Route 4C (revised) transmission line route.

Based on the above findings and remediation efforts and the distance from the two areas to the proposed transmission line corridor, it is highly unlikely that there are any MEC items on the surface or in the subsurface of the corridor. However, to ensure the construction crews safety, I highly recommend that an ordnance recognition course be given to all site personnel as a precaution. This is the only mitigation action I deem appropriate based on the current available information.

In the event the construction crews were to encounter MEC, at that point they would have to resort to construction support consisting of two UXO technicians on site to observe the excavation. The UXO team would identify any MEC items and either remove them, if it was appropriate to do so, or call the local bomb squad to respond and destroy the item(s).

If you have any questions please do not hesitate to contact me at (678) 969-2451 Office or (404) 387-0798 Cell.

Sincerely yours,

Michael E. Short
Technical Director

If you have any questions please do not hesitate to contact me at (678) 969-2451

Office or (404) 387-0798 Cell.

Sincerely yours,

Michael E. Short
Technical Director

EXHIBIT