

Attachment A – CPUC CEQA Findings of Fact

Regarding the Supplemental Final Environmental Impact Report for the
El Casco System Project
State Clearinghouse No. 2007071076

I. Certification

The California Public Utilities Commission (CPUC or Commission) hereby certifies the El Casco System Project (Project) Supplemental Final Environmental Impact Report (EIR) (State Clearinghouse No. 2007071076). In accordance with CEQA Guidelines §15090, the CPUC, as California Lead Agency for the Project, certifies that:

- (1) The Supplemental Final EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
- (2) The Supplemental Final EIR was presented to the Commission, and the Commission has received, reviewed, and considered the information contained in the Supplemental Final EIR and hearing documents prior to approving the Project;
- (3) The Supplemental Final EIR reflects the CPUC's independent judgment and analysis.

The CPUC has exercised independent judgment in accordance with Public Resources Code, Section 21082.1(c) in retaining its own environmental consultant and directing the consultant in preparation of the EIR as well as reviewing, analyzing, and revising material prepared by the consultant.

In accordance with Public Resources Code §21081 and CEQA Guidelines §15091, the Commission has made one or more specific written findings regarding significant impacts associated with the Project. Per CEQA Guidelines §15163(e), the findings under §15091 are made for each significant effect shown in the previous EIR as revised. Those findings are presented below, along with the rationale behind each of the findings.

The documents and other materials that constitute the record of proceedings on which the Project findings are based are located at the California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102. The custodian for these documents is the Energy Division, CEQA Unit. This information is provided in compliance with Public Resources Code §21081.6(a)(2) and 14 California Code of Regulations §15091(e).

II. Project Background

II.1 Project Description Summary

Southern California Edison (SCE) filed an application (Application Number A.07 02 022) for a Permit to Construct (PTC) Electrical Facilities with Voltages between 50 kV and 200 kV with the California Public Utilities Commission (CPUC) on February 16, 2007 for the El Casco System Project (Project). The Final EIR for the El Casco System Project was certified and the Project approved by the CPUC on December 18, 2008 in Decision 08-12-031. The Project, as approved, includes the construction of the new El Casco Substation, upgrades to the existing Zanja and Banning Substations and SCE's Mill Creek Communications Site, upgrades to a total of 15.4 miles of 115 kV subtransmission line and associated structures, and

installation of fiber optic communication cables within existing conduits in public streets and on existing SCE structures between the Cities of Redlands and Banning. The entire Project is located within Riverside and San Bernardino Counties, California.

Specifically, the Project as approved by the CPUC includes the following elements:

- Construct the new El Casco 220/115/12 kV Substation within the Norton Younglove Reserve in the County of Riverside, associated 220 kV and 115 kV interconnections, and new 12 kV line getaways (i.e., distribution line connections out of the substation).
- Replace approximately 13 miles of existing single-circuit 115 kV subtransmission lines with new, higher capacity double-circuit 115 kV subtransmission lines and replace support structures within existing SCE rights-of-way (ROWS) in the Cities of Banning and Beaumont and unincorporated areas of Riverside County.¹
- Replace approximately 1.9 miles of existing single-circuit 115 kV subtransmission lines with new, higher capacity single-circuit 115 kV subtransmission lines and replace support structures within existing SCE ROWs in the City of Beaumont and unincorporated Riverside County.
- Replace approximately 0.5 mile of existing single-circuit 115 kV subtransmission lines with new, higher capacity single-circuit 115 kV subtransmission lines on existing support structures within existing SCE ROWs in the City of Beaumont and unincorporated Riverside County.
- Rebuild 115 kV switchracks within Zanja and Banning Substations in the Cities of Yucaipa and Banning, respectively.
- Install telecommunications equipment at the proposed El Casco Substation and at SCE's existing Mill Creek Communications Site.
- Install fiber optic cables within public streets and on existing SCE structures between the Cities of Redlands and Banning.

Construction of the El Casco System Project began in late February 2009 and is expected to continue through 2012. As of October 2011, construction of the El Casco Substation is essentially complete, upgrades at Banning and Zanja Substations are complete, fiber optic cable installation is complete, and Segment 3 of the 115 kV subtransmission line is complete (see Figure B-1 for segment definitions). Construction of Segments 6, 7, and 8 of the 115 kV subtransmission line are nearing completion and construction of Segment 5 is expected to start in late January 2012. Construction of Segment 1 is planned to commence in 2012, following issuance of a NTP.

Construction of Segments 2 and 4 has not started because when SCE completed final engineering for the 115 kV subtransmission line it was determined that the design within these segments had changed substantially from the project approved by the CPUC.

II.2 Modifications to the Approved Project

As described in the Draft EIR (December 2007), the approved 115 kV subtransmission line work would include the installation of approximately 225 new steel poles, ranging from 65 to 85 feet tall.

¹ Various segments of the existing 115 kV subtransmission lines also have distribution lines on the same structures. Where there are existing distribution lines on the structures, they would be transferred to the new structures.

Approximately 25 percent of these steel poles would be bolted-base tubular steel poles (TSP), and the remaining 75 percent would be direct-buried lightweight steel (LWS) poles. Except for the steel poles installed within the substation site, these structures would be placed within existing 115 kV ROWs or along public street ROWs. Any steel poles that are replacing existing wood pole structures in existing ROWs would be primarily installed at the same locations (i.e., within approximately 10 feet of the existing structures).

As part of final engineering, SCE determined that additional poles will be required along portions of the 115 kV subtransmission line alignment. This determination was made based on a topographical/profile survey, detailed property rights check, individual structure strength ratings, conductor sizes, span lengths, number of conductors/cables to be attached, and wind loading. Conductor sag calculations were used to determine the proper final pole heights along the line route. In designing the 115 kV subtransmission line, SCE attempted to determine the optimal combination of LWS poles and TSPs; where possible, LWS poles were the preferred choice, as they are less costly to purchase and construct. However, in certain areas the terrain mandated the use of TSPs, such as at highway, waterway, and canyon crossings to accommodate longer spans and higher conductor tensions. All of these factors were considered in determining the final design for Segments 2 and 4.

The revised Project would approximately double the number of 115 kV structures originally proposed along Segment 2 (33 vs. 61 structures), which begins just west of South Highland Home Road and continues east to a point just west of South San Gorgonio Avenue/Highway 243 (approximately 2.85 miles), and along Segment 4 (30 vs. 57 structures), which begins just east of Bolo Court/Westward Avenue and continues east to just west of Highland Springs Avenue (approximately 2.75 miles). As noted above, the original design assumed generally one-for-one replacement of the existing wood pole structures which exist along Segments 2 and 4. Additionally, the structure heights within Segments 2 and 4 have increased substantially from the original design (65 to 85 feet tall) and would instead range from 75 to 120 feet.

II.3 Project Objectives/Purpose and Need

The Project objectives are:

- Serve long-term projected electrical load requirements in the Electrical Needs Area;
- Provide enhanced system reliability by constructing a project in a suitable location to serve the Electrical Needs Area;
- Provide greater operational flexibility to transfer load between lines and substations;
- Provide substations with more than one 28 mega volt ampere (MVA) transformer with service from two 115 kV lines;
- Provide safe and reliable electrical service consistent with SCE's planning guidelines and Subtransmission Guidelines;
- Meet project need while minimizing environmental impacts; and
- Meet project need in a cost-effective manner.

III. Environmental Review Process and the Supplemental EIR

The CEQA environmental review process for the El Casco System Project started on July 16, 2007, with the CPUC's issuance of a Notice of Preparation of an EIR. As noted above, the Final EIR for the El Casco System Project was certified and the Project approved by the CPUC on December 18, 2008 in Decision 08-12-031. On August 29, 2011, SCE filed a *Petition for Modification of Decision No. 08-12-031* detailing the

Project modifications within Segments 2 and 4. The CPUC determined that preparation of a supplemental EIR was required per CEQA Guidelines §15163(a). As required by CEQA Guidelines §15163(c), the supplemental EIR was given the same kind of notice and public review as is given to a draft EIR under §15087. The public involvement milestones associated with the environmental review process for the Supplemental Draft and Final EIRs are described below.

- **Supplemental Draft EIR Public Review Process.** The CPUC published the Supplemental Draft EIR for the El Casco System Project on November 30, 2011 commencing the 45-day public review period, which initially ended on January 13, 2012. The review period was extended to January 17, 2012 to meet State Clearinghouse requirements. The public was invited to submit written comment on those portion of the document that were revised and included in the Supplemental Draft EIR; i.e. the new Executive Summary, Introduction (Section A), Modifications to the Project (Section B), revised Visual Resources Analysis (Section C.1), Issue Areas Where Modifications Result In No Substantial Change (Section C.2), and Other CEQA Considerations (Section D) (CEQA Guidelines §15088.5(f)(2)).
- **Supplemental Final EIR.** The Supplemental Final EIR was published on February 17, 2012. Per the requirements of California Public Resources Code §21092.5 and CEQA Guidelines §15088, the CPUC provided a response to each public agency, organization, and individual that commented on the Supplemental Draft EIR during the comment period (November 30, 2011 through January 17, 2012); and documented text changes resulting from comments submitted during the Supplemental Draft EIR comment period.

III. New/Revised Environmental Impacts and Findings

Public Resources Code §21081 states that no public agency shall approve or carry out a project for which an EIR has been completed which identifies one or more significant effects on the environment unless the public agency makes one or more of the following findings:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Pursuant to Public Resources Code §21081 and CEQA Guidelines §§15091 and 15163(e), the Commission has made one or more of these specific written findings regarding significant impacts associated with the modifications to the originally approved Project.² Such findings are made in Sections V.2 and V.3 below.

The Supplemental EIR evaluates the change in impacts resulting from the proposed modifications detailed in SCE's *Petition for Modification of Decision No. 08-12-031* (August 29, 2011). As discussed

² The CPUC previously adopted CEQA Findings on all impacts of the originally approved Project. (Decision 08-12-031, Attachment A.)

in Supplemental EIR Section C.2, the proposed modifications result in no substantial change in the previous impact determinations for the majority of environmental disciplines. However, as discussed in Section C.1, the proposed modifications result in changes to Visual Resources impacts, specifically Impacts V-1 and V-2 (from the Final EIR) and three new impacts, Impacts V-19, V-20, and V-21. The Supplemental EIR discloses the environmental impacts expected to result from the construction and operation of the modified El Casco System Project. Where feasible, mitigation measures were identified to avoid or minimize significant environmental effects.

III.1 Environmental Impacts Found to be Less Than Significant

The Commission finds that the modifications to the originally approved Project would not result in any new significant impacts or substantial increases in the severity of impacts in the following environmental disciplines, for the reasons set forth in Supplemental EIR Section C.2: Air Quality, Land Use, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Public Services and Utilities, and Transportation. Impacts related to Mineral Resources and Population and Housing would not be significant (No Impact).

Based on the issue area assessment for Visual Resources in the Supplemental EIR (Section C.1), the Commission determines that the Project will have a less than significant impact for Impact V-1 and Impact V-21, as described below.

V-1: Short-term visibility of construction activities, equipment, and night lighting

(subtransmission line)

Construction activities along Segments 2 and 4 of the subtransmission line will be transient and of short duration as construction progresses along the route. As a result, affected viewers would be aware of the temporary nature of Project construction impacts, which would decrease their sensitivity to the impact. The resulting visual impacts would be adverse but less than significant. (Supplemental EIR p. C.1-14)

Impact V-21: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 3 on southbound SR-79

The proposed LWS poles would have a more simple structural design compared to the H-frame structures they would replace, but the LWS poles would be taller, there would be approximately twice as many structure locations, and there would be twice as many conductors. Also, the LWS poles would have a more industrial, metallic gray appearance compared to the more natural, rough-hewn wood poles to be replaced. The new structures and additional conductors would also result in a noticeable net increase in view blockage of background mountains and sky (depending on view direction). However, because the existing subtransmission line towers and conductors have established a structural precedence with respect to form and line, and an additional lower voltage wood-pole line would remain adjacent to the new line, the existing structural context would lessen the visual contrast of the replacement structures. The resulting visual contrast would be moderate when viewed from either southbound or northbound State Route 79. In the context of the existing landscape's moderate-to-high visual sensitivity, the resulting visual impact would be adverse but less than significant. (Supplemental EIR pp. C.1-17 to 18)

III.2 Significant Environmental Impacts That Have Been Reduced to a Less-than-Significant Level

The Commission hereby finds, pursuant to Public Resources Code §21081, that the following environmental impacts can and will be mitigated to below a level of significance based upon the

implementation of the mitigation measures in the Supplemental EIR. These findings are based on the discussion of Visual Resources impacts in the Supplemental Final EIR (Section C.1). An explanation of the rationale for each finding is presented below.

To assess impacts to Visual Resources the Visual Sensitivity–Visual Change Methodology was used. The specific study area for the visual resources analysis was limited to the Segments 2 and 4 of the Project, where SCE has proposed changes in the design of the approved Project, and is defined by the viewpoints from which these segments would be seen. The viewshed is substantial given the relative openness of much of the landscape, the height of the proposed structures, and the availability of viewing opportunities from travel routes and nearby residential areas.

Impact V-1: Short-term visibility of construction activities, equipment, and night lighting

(staging areas)

As discussed in Section C.1 of the Supplemental Final EIR, construction impacts on visual resources would result from the presence and visual intrusion of construction vehicles, equipment, materials, and work force at staging areas. Construction equipment and activities would be seen by various viewers in close proximity to the staging areas including nearby rural and suburban residents as well as travelers on highways and local roads. View durations from these vantage points would vary from moderate to extended. Construction impacts on visual resources would also result from the temporary use of night lighting, if night lighting is not appropriately controlled at the construction sites.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project which mitigate significant effects on the environment from Impact V-1 to a less-than-significant level. These mitigation measures, identified as V-1a and V-1b, have already been adopted by the CPUC as conditions of approval for the approved Project (Decision 08-12-031) and remain applicable to the modified Project. These measures are provided below for reference.

V-1a Reduce Visibility of Construction Activities and Equipment. Substation construction sites and all staging and material and equipment storage areas including storage sites for excavated materials shall be appropriately located away from areas of high public visibility. If visible from nearby roads; residences; public gathering areas; recreational areas, facilities, or trails; construction sites and staging areas shall be visually screened using temporary screening fencing. Fencing will be of an appropriate design and color for each specific location. Additionally, avoid construction in areas visible from recreation facilities and areas during holidays and periods of heavy recreational use. SCE shall submit final construction plans demonstrating compliance with this measure to the CPUC for review and approval at least 60 days prior to the start of construction.

V-1b Reduce Construction Night Lighting Impacts. SCE shall design and install all lighting at construction sites, storage yards, and staging areas such that light bulbs and reflectors are not visible from public viewing areas and private residences; lighting does not cause reflected glare; and illumination of the Project facilities, vicinity, and nighttime sky are minimized. SCE shall submit a Construction Lighting Mitigation Plan to the CPUC for review and approval at least 90 days prior to the start of construction or the ordering of any exterior lighting fixtures or components, whichever comes first. SCE shall not order any exterior lighting fixtures or components until the Construction Lighting Mitigation Plan is approved by the CPUC. The Plan shall include but is not limited to the following:

- Lighting shall be designed so exterior light fixtures are hooded, with lights directed downward or toward the area to be illuminated and so that backscatter to the nighttime sky is minimized. The design of the lighting shall be such that the luminescence or light sources are shielded to prevent light trespass outside the Project boundary

- All lighting shall be of minimum necessary brightness consistent with worker safety
- High illumination areas not occupied on a continuous basis shall have switches or motion detectors to light the area only when occupied.

Rationale for Finding. Implementation of Mitigation Measures V-1a and V-1b will ensure that staging areas are located away from areas of high visibility and are appropriately screened, and that a Construction Lighting Mitigation Plan is developed and implemented. Together these measures will reduce impacts related to visibility of construction activities, equipment, and night lighting to less than significant.

Reference. Section C.1 (Visual Resources) of the Supplemental Final EIR provides a complete assessment of the impacts from the modified Project related to visual resources.

Impact V-2: Long-term visibility of land scars and vegetation clearance in arid and semi-arid landscapes

As discussed in Section C.1 of the Supplemental Final EIR, land scarring from use of staging areas, construction of new access and spur roads, and activities along the ROW can be long-lasting in arid and semi-arid environments where vegetation recruitment and growth is slow. In-line views of linear land scars or newly bladed roads are particularly problematic and introduce adverse visual change and contrast by causing unnatural vegetative lines and soil color contrast from newly exposed soils.

Finding. The CPUC finds that changes or alterations have been incorporated into the Project that mitigate significant effects on the environment from Impact V-2. Specifically, the CPUC finds that by requiring Mitigation Measures V-2a and V-2b, which have already been adopted by the CPUC as conditions of approval for the approved Project (Decision 08-12-031) and remain applicable to the modified Project, scarring impacts that affect visual resources will be reduced to a less-than-significant level. These measures are provided below for reference

V-2a Reduce In-Line Views of Land Scars. Construct access or spur roads at appropriate angles from the originating, primary travel facilities to minimize extended, in-line views of newly graded terrain. Contour grading should be used where possible to better blend graded surfaces with existing terrain. SCE shall submit final construction plans demonstrating compliance with this measure to the CPUC for review and approval at least 60 days prior to the start of construction. Construction plans will include sufficient photo-documentation to document pre-construction conditions.

V-2b Reduce Visual Contrast from Unnatural Vegetation Lines. In those areas where views of land scars are unavoidable, the boundaries of disturbed areas shall be aggressively revegetated to create a less distinct and more natural-appearing line to reduce visual contrast. If necessary to ensure vegetative success, plantings will be watered. If Measure V-2b is not successful within two years following the completion of construction, a new plant palette will be developed in consultation with an approved restoration ecologist. Furthermore, all graded roads and areas not required for on-going operation, maintenance, or access shall be returned to pre-construction conditions. SCE shall submit final construction and restoration plans demonstrating compliance with this measure to the CPUC for review and approval at least 60 days prior to the start of construction. Construction plans will include sufficient photo-documentation to document pre-construction conditions.

Rationale for Finding. Mitigation Measures V-2a and V-2b require actions to reduce in-line view of scars and the visual contrast associated with scarring. These measures will reduce the visibility of construction scars and limit the activities that contribute to scarring, and will therefore reduce the visual impacts associated with construction to a less-than-significant level.

Reference. Section C.1 (Visual Resources) of the Supplemental Final EIR provides a complete assessment of the impacts from the modified Project related to visual resources.

III.3 Significant Environmental Impacts That Cannot Be Avoided or Reduced to a Less-than-Significant Level

Based on the resource/issue area assessment in the Supplemental Final EIR, the Commission has determined that the Project will have new significant impacts to Visual Resources as discussed below, and that these impacts cannot be avoided or reduced to a level that is less than significant. These findings are based on the discussion of Visual Resources impacts in the Supplemental Final EIR (Section C.1). For each significant and unavoidable impact identified below, the Commission has made a finding(s) pursuant to Public Resources Code §21081. An explanation of the rationale for each finding is also presented below.

Impact V-19: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 1 on South Sunset Avenue

As discussed in Section C.1 (Visual Resources) of the Supplemental Final EIR, the proposed LWS poles will have a simpler structural design compared to the H-frame wood-pole structures they are replacing, but the LWS poles will be taller, and there will be approximately twice as many structure locations, and twice as many conductors compared to existing conditions. Also, the LWS poles will have a more industrial, metallic gray appearance compared to the more natural, rough-hewn existing wood poles. The new LWS pole structures and additional conductors will also result in a substantial net increase in view blockage of background hills, mountains, and sky. The larger number of distinct structures with short separation (span) distances will cause a “picket fence” visual effect that would visually partition the landscape and eliminate the larger gaps and less-obstructed sightlines between structures that are more apparent with the existing condition. As a result, the revised Project will be more visually intrusive and result in a moderate-to-high degree of visual contrast. In the context of the existing landscape’s moderate-to-high visual sensitivity, the resulting visual impact would be significant.

Finding. The CPUC finds that specific economic, legal, social, technological, and other considerations make it infeasible to reduce Impact V-19 to a less than significant level. There are no feasible mitigation measures or Project alternatives to reduce Impact V-19 to a less-than-significant level.

Rationale for Finding. The modifications to Segments 2 and 4 result in a “picket fence” visual effect that would visually partition the landscape resulting in a significant impact. There are no feasible mitigation measures or alternatives available to reduce the significant visual impact to a level that will be less than significant.

Reference. Section C.1 (Visual Resources) of the Supplemental Final EIR provides a complete assessment of the impacts from the modified Project related to visual resources.

Impact V-20: Increased structure contrast, industrial character, view blockage, and skylining when viewed from Key Viewpoint 2 on Faircliff Street

The proposed LWS poles will have a simpler structural design compared to the H-frame wood-pole structures they are replacing, but the LWS poles will be taller, and there will be more than twice as many structure locations, and twice as many conductors compared to existing conditions. Also, the LWS poles will have a more industrial, metallic gray appearance compared to the more natural, rough-hewn existing wood poles. The new structures and additional conductors will also result in a substantial net increase in view blockage of background hills and sky. The larger number of distinct structures with short separation

(span) distances will cause a “picket fence” visual effect that will visually partition the landscape and eliminate the larger gaps and less-obstructed sightlines between structures that are more apparent with the existing condition. As a result, instead of only one or possibly two structures being typically visible from a given residence, two or three structures may now be visible from that same residence. Therefore, the Project with implementation of the proposed changes will be more visually intrusive and result in a moderate-to-high degree of visual contrast. In the context of the existing landscape’s moderate-to-high visual sensitivity, the resulting visual impact would be significant.

Finding. The CPUC finds that specific economic, legal, social, technological, and other considerations make it infeasible to reduce Impact V-20 to a less than significant level. There are no feasible mitigation measures or Project alternatives to reduce Impact V-20 to a less-than-significant level.

Rationale for Finding. The modifications to Segments 2 and 4 result in a “picket fence” visual effect that would visually partition the landscape and substantially increase the number of visible structures from any given residence resulting in a significant impact. There are no feasible mitigation measures or alternatives available to reduce the significant visual impact to a level that will be less than significant.

Reference. Section C.1 (Visual Resources) of the Supplemental Final EIR provides a complete assessment of the impacts from the modified Project related to visual resources.

Cumulative Visual Resources Impacts: Cumulative impacts to a perceived increase in structure contrast, industrialization of the landscape, view blockage, and skylining of transmission line, tower infrastructure, and substations (V-3 through V-8, V-10 through V-12, and V-19 through V-21)

There are six residential cumulative projects that, when constructed, would be visible within the same field of view as the Project (See original Draft EIR, December 2007, Table F-2, Map Nos. F1, F10, F11, F19, F23, and F25). All six of these residential development projects would (a) be consistent with other residential uses in the immediate area and region; (b) not appreciably change the character of the existing, rapidly developing suburban/urban landscape; and (c) not share the same or similar industrial character as the Project. In all six cases, however, substantial view blockage of background hills and sky would occur when seen from viewpoints north of the developments. On its own, view blockage impacts caused by Segment 2 and portions of Segment 4 of the Project would be significant and unavoidable. In conjunction with the substantial view blockage that would occur in combination with the residential projects, the Project would result in a cumulatively considerable contribution to a significant cumulative impact.

There are also two energy infrastructure projects that would share many of the same characteristics of the Project, and would either be within the same field of view as or in the vicinity of the Project once constructed. These projects would exhibit similar complex structural form and industrial character as the Project. The two projects include:

- Devers-Palo Verde No. 2 (DPV2) Transmission Line Project (No. A2)
- Sunset Substation and Transmission and Distribution Project (No. E2)

The Project’s visual impacts will combine with the highly industrial character of the DPV2 500 kV Project structures that will be placed in the nearby Devers-Valley corridor to the south, and the combined increase in industrial character and view blockage would result in a cumulatively considerable contribution to a significant cumulative impact.

Finding. The CPUC finds that specific economic, legal, social, technological, or other considerations make infeasible additional mitigation measures or Project alternatives to reduce cumulatively considerable contribution of the Project on impacts V-3 through V-8, V-10 through V-12, and V-19 through V-21 to less than significant/not cumulatively considerable. Implementation of mitigation

measures identified for the Project, and which have already been adopted by the CPUC as conditions of approval for the approved Project (Decision 08-12-031), will remain applicable (Mitigation Measures V-3a and V-3b) and will reduce the Project's contribution to these impacts to the greatest extent feasible.

Rationale for Finding. There is the possibility that a variety of projects will occur in the same viewsheds as the Project. Visual impacts from operation of these projects would result in an increase in visual impacts to adjacent land uses that will overlap with those of the Project. Construction of the cumulative projects could further exacerbate the significant Project-related visual impacts. The CPUC finds that no mitigation measures are available to reduce this impact. As no mitigation is available to reduce this impact, the Project's contribution to significant cumulative operational visual impacts would remain cumulatively considerable.

Reference. Section C.1.3.6 (Visual Resources – Cumulative Impact Analysis) of the Supplemental Final EIR provides a complete assessment of the cumulative impact on visual resources.

IV. Alternatives to the Modified Project Design

IV.1 Approved Project Design

The environmental impacts of Segments 2 and 4, as previously approved by the CPUC on December 18, 2008 in Decision 08-12-031, were analyzed in the Final EIR for the El Casco System Project, which was certified in that same decision. The approved design included a total of approximately 225 new steel poles (versus the 248 steel poles included in the proposed modifications). The approved design included approximately half the number of 115 kV structures than the proposed modifications along Segment 2 (33 vs. 61 structures) and along Segment 4 (30 vs. 57 structures). The approved design assumed generally one-for-one replacement of the existing wood pole structures which exist along Segments 2 and 4. Additionally, the structure heights within Segments 2 and 4 as approved were 65 to 85 feet tall, compared to the proposed modifications, which range from 75 to 120 feet.

The CPUC finds that specific economic, legal, social, technological, and other considerations make the approved design of Segments 2 and 4 infeasible. The originally approved Project was based on a conceptual design for the 115 kV subtransmission line, which was subsequently refined during the final engineering process, resulting in the need for 23 more poles (overall) than initially anticipated, with a different mix of TSP and LWS poles than originally expected. This determination was made based on a topographical/profile survey (terrain), detailed property rights check, individual structure strength ratings, conductor sizes, span lengths, number of conductors/cables to be attached, wind loading, and crossing (e.g., highways, waterways, railroads, power lines, other utilities, etc.). Conductor sag calculations were then used to determine the proper final pole heights along the line route. In addition, the design must comply with CPUC General Order 95 requirements and SCE design standards.

In designing the 115 kV subtransmission line, SCE attempted to determine the optimal combination of LWS poles and TSPs taking into consideration all of the factors noted above. Specifically, Segments 2 and 4 consist of slightly rolling hills, which means that LWS poles are possible and preferred because they allow for short line spans, which facilitates the use of shorter structures. While TSPs support longer spans, LWSs are generally shorter and require less ground disturbance. In certain areas, however, the terrain mandates the use of TSPs, such as at highway, waterway, and canyon crossings to accommodate longer spans and higher conductor tensions. During final engineering, SCE determined that constructing the 115 kV subtransmission line with 225 structures per the original conceptual design would require installation of substantially more TSPs through Segments 2 and 4. To avoid this, SCE modified the design to include 23 additional poles (overall). The modified design will have 20 percent TSPs in Segment 2 and 16 percent TSPs

in Segment 4, which is less than the original design, which was stated in the Final EIR as having approximately 25 percent TSPs. In light of these engineering considerations, the CPUC rejects the previously approved conceptual design in favor of the modified design based on final engineering.

IV.2 Alternatives/Mitigation Measures Suggested in Comments on the Supplemental Draft EIR

One commenter suggested that the 115 kV subtransmission line be placed underground through the residential districts demarcated within the Beaumont boundaries (Segments 4-1 and 4-2) to reduce the negative visual impact in the residential areas.

The CPUC finds that specific economic, legal, social, technological, and other considerations make undergrounding the subtransmission line through the residential districts demarcated within the Beaumont boundaries (Segments 4-1 and 4-2) infeasible. Specifically, the Recirculated Draft EIR (July 2008) for the original Proposed Project evaluated undergrounding a portion of the transmission line and determined that undergrounding the line would result in substantially more severe impacts to air quality, biological resources, cultural resources, geology and soils, hazardous materials, hydrology and water quality, noise, and traffic than construction of the line aboveground. Similarly, while undergrounding of the 115 kV subtransmission line Segments 4-1 and 4-2 would reduce visual impacts in those areas, it would have the following environmental impacts:

- Underground construction would result in greater nitrogen oxide (NO_x) and particulate matter (PM₁₀) emissions and the highest localized impacts to sensitive receptors (residences) due to trenching and the extended construction period that would be required.
- The extended duration for construction would increase wildlife disruption.
- The increase ground disturbance during construction would result in greater possibility of encountering undiscovered buried cultural or paleontological resources.
- The extensive trenching required would increase the amount of soil disturbed and the associated risk of erosion during construction.
- Underground construction would increase the possibility of impacts to groundwater.
- The greater construction equipment requirements for underground construction would increase the use of hazardous materials and associated risks for spills and contamination.
- Noise associated with underground construction would affect the same sensitive receptors, but the intensity and duration of the impacts would increase substantially.
- The extended construction duration would result in increased road delay.

Additionally, undergrounding the 115 kV subtransmission line west of Highland Springs Avenue would not result in significant benefits since cinder block walls separate the Four Seasons' residential development from the ROW, which would partially block views of the transmission line, and the residential structures are sited such that the back of the houses are adjacent to the ROW. In addition, the ROW immediately west of Highland Springs Avenue is dedicated to the 115 kV subtransmission line. (See Recirculated Draft EIR, July 2008, Section E.2.1.2.)

Further, the previous Commission decision approving the originally Proposed Project (D. 08-12-031) considered underground construction in the Sun Lakes area. The Commission determined that undergrounding to benefit one community at the expense of all of SCE's ratepayers raised a "serious question of reasonableness" in light of the considerable expenses and far greater environmental impacts of

undergrounding during construction. The Commission determined it would be “prohibitively expensive” to require underground construction every time a transmission line posed a visual impact to a community. Thus, undergrounding to reduce visual impacts to the Four Seasons community, which is already adjacent to an existing right-of-way with an existing single-circuit subtransmission line, would be inconsistent with the Commission’s policies. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001-1003 [agency may reject alternative on policy considerations].)

Considering the increase in severity of construction impacts related to underground construction, the additional cost of underground construction, and the precedence that would be set for undergrounding subtransmission lines for the benefit of one community at the expense of all of SCE’s ratepayers, undergrounding of the 115 kV subtransmission line within the Beaumont boundaries is not feasible as an alternative or mitigation measure to reduce the visual impacts of the El Casco System Project.

V. Responses to Comments on the Supplemental Draft EIR and Revisions to the Supplemental Final EIR

The Supplemental Final EIR (February 2012) includes the comments received on the Supplemental Draft EIR and responses to those comments, as well as any text changes resulting from the comments submitted during the Supplemental Draft EIR review period (November 30, 2011 to January 17, 2012). The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines §15088(b).

Finding/Rationale. Responses to comments made on the Supplemental Draft EIR and revisions made in the Supplemental Final EIR merely clarify and amplify the already adequate analysis presented in the Supplemental Draft EIR and do not trigger recirculation per CEQA Guidelines §15088.5.

VI. Adoption of a Monitoring and Reporting Program for the CEQA Mitigation Measures

The modifications to the Project detailed in the Supplemental Final EIR do not result in the need for additional mitigation measures or changes to existing mitigation measures previously adopted by the CPUC. The Mitigation Monitoring and Reporting Program adopted by the CPUC is not affected by the Project modifications and all previously adopted mitigation measures are applicable to the modified Project.

(End of Attachment A)